

Old Oak Compulsory Purchase Order (CPO)

Equality Impact Assessment

Old Oak and Park Royal Development Corporation

September 2025

Quality information

Prepared by	Checked by	Verified by	Approved by
Lucy Jones Senior Social Impact Consultant	Laura Walker Equality Specialist	Dave Widger Technical Director	Dave Widger Technical Director

Revision History

Revision	Revision date	Details	Authorized	Name	Position
V1	20/01/25	Draft EqlA	NS	Nina Schuler	Technical Director
V2	01/07/25	Final Draft EqlA	DW	Dave Widger	Technical Director
V3	09/09/25	Final EqlA	DW	Dave Widger	Technical Director

Prepared for:

Old Oak and Park Royal Development Corporation

Prepared by:

AECOM Limited
Aldgate Tower
2 Leman Street
London E1 8FA
United Kingdom

T: +44 (0)20 7061 7000
aecom.com

Table of Contents

1.	Introduction	3
1.1	Purpose	3
1.2	Context	3
1.3	Report structure	7
2.	Methodology	8
2.1	Scoping Report	8
2.2	Primary research	8
2.3	Assessment of impacts	10
2.4	EqlA Action Plan	12
3.	Legislation, policy, and planning review	14
3.1	Legislation	14
3.2	National policy	16
3.3	Regional policy	17
3.4	Local planning and other policies	19
3.5	Wider Local Policy (i.e. housing, jobs and skills)	25
3.6	Summary of key priorities	25
4.	Evidence review	29
4.1	Introduction	29
4.2	Equalities baseline	29
4.3	Key evidence and issues: Regeneration and Equality	30
5.	Primary research findings	42
5.1	Introduction	42
5.2	Directly affected business interests	42
5.3	Directly affected residential interests	49
5.4	Wider residential interests	53
5.5	Views on regeneration	56
6.	Stakeholder consultation	61
6.1	Introduction	61
6.2	Overview of consultation	61
6.3	Stakeholder responses	61
7.	Assessment of impacts	63
7.1	Introduction	63
7.2	Housing	63
7.3	Employment, skills and training	69
7.4	Neighbourhood and community	72
7.5	Health and wellbeing	75
7.6	Transport and connectivity	79
7.7	Summary of potential equality impacts	80
7.8	Regeneration equality outcomes	88
8.	EqlA Action Plan	92
9.	Conclusions and next steps	96
9.1	Conclusions	96
9.2	Next steps	97
	Appendix A Old Oak Draft Compulsory Purchase Order area (July 2024)	98
	Appendix B Equality Survey Notification Letters	99
	B.1 Business notification letter	99
	B.2 Residential notification letter	101
	Appendix C Old Oak West: Equalities Impact Assessment Baseline Report (Arup) [double-click to open]	103

Figures

Figure 1-1: Old Oak study area.....	4
Figure 1-2: Order map for the Proposed Regeneration	7
Figure 4-1: Geographical area boundaries	29
Figure 4-2: PTAL key and map of the Old Oak area	41
Figure 5-1: Business types.....	44
Figure 5-2: Age groups of business owners/managers/respondents	45
Figure 5-3: Shared protected characteristics of customers	47
Figure 5-4: Views on the existing site	47
Figure 5-5: Age groups of residents	51
Figure 5-6: Age group of residents - Indirect residents	55

Tables

Table 2-1: Breakdown of direct and wider regeneration survey responses	10
Table 2-2: EqIA assessment framework.....	12
Table 3-1: Equality priorities	26
Table 4-1: Existing housing tenure split and housing waiting list in the three boroughs.....	31
Table 4-2: Demographic breakdown of social housing waitlist in the Borough of Brent	32
Table 4-3: Average waiting times for social housing for priority bands A-C in Brent.....	33
Table 4-4: Average waiting times for social housing for priority bands 1-3 in LBHF	34
Table 4-5: Socio-economic issues relating to age and ethnicity	35
Table 4-6: Health and wellbeing indicators in East Acton and the three boroughs	37
Table 4-7: Prevalence of common mental health disorder (% of population)	38
Table 4-8: Average public transport journey times (minutes) to different services	39
Table 4-9: Share of trips by travel mode and ethnic group in London, 2021	40
Table 5-1: Business position	42
Table 5-2: Leasehold status of business	43
Table 5-3: Business category	43
Table 5-4: Length of time in operation at current location	44
Table 5-5: Ethnic group of business owners/managers	45
Table 5-6: Religion of business owners/managers	46
Table 5-7: Number of people employed on the premises full-time.....	46
Table 5-8: Business relocation preferences	48
Table 5-9: Measures to enable businesses to continue operating	48
Table 5-10: Customer response to relocation	49
Table 5-11: Breakdown of housing tenure and landlord	50
Table 5-12: Breakdown of household numbers	50
Table 5-13: Residents time at current address	51
Table 5-14: Ethnic group of residents	52
Table 5-15: Religion of residents.....	52
Table 5-16: Resident relocation preferences	53
Table 5-17: Types of household ownership- Indirect residents	54
Table 5-18: Number of people who live at the address- Indirect residents	54
Table 5-19: Indirect residents time at current address	54
Table 5-20: Ethnic group - indirect residents.....	55
Table 5-21: Religion - indirect residents	56
Table 7-1: Summary of Potential Impacts	81
Table 8-1: EqIA Action Plan.....	92

Executive Summary

The Old Oak and Park Royal Development Corporation (OPDC) commissioned AECOM to provide an Equality Impact Assessment of the potential equality impacts on residents and businesses associated with a Compulsory Purchase Order (CPO) which may be required to facilitate the regeneration at Old Oak. OPDC is a Mayoral Development Corporation established to oversee the regeneration of the Old Oak opportunity area. OPDC is seeking to transform one of London's most inaccessible areas into a new well-connected urban centre and transport interchange through the delivery of new housing and commercial developments surrounded by sustainable neighbourhoods and open space. As a public authority, OPDC has a duty under the Equality Act 2010 (the Public Sector Equality Duty (PSED)) to ensure that when exercising its powers it has due regard to the need to eliminate unlawful discrimination, advance equality of opportunity and foster good relations between those with a protected characteristic and all others.

The purpose of this EqlA is to demonstrate how OPDC has discharged the PSED in the early stages of the comprehensive mixed-use regeneration of Old Oak (the Proposed Regeneration) and outline actions that may be taken to support compliance as it progresses with regeneration. To fulfil this purpose, this EqlA considers how the CPO would contribute to the realisation of equality effects of businesses and residents affected and aims to understand the needs and requirements of the local community in terms of regeneration outcomes through desk-based review and primary research.

A Draft EqlA was developed in January 2025 to provide OPDC with an early indication of potential direct, indirect and wider equality issues and actions to minimise any negative impacts or enhance any positive impacts identified. This EqlA reflects updates to land acquisition and progress towards further recommendations and the EqlA Action Plan as of September 2025. This EqlA will support the making of the CPO in September 2025.

A desk-based review of relevant policies and legislation, planning documents, and documents associated with the Old Oak regeneration outlined in **Chapter 3** (including the Old Oak equalities baseline produced by Arup in 2023 shown in **Chapter 4**), informed the scope of themes and issues for the assessment of potential equality impacts. AECOM's Primary Research Team then undertook in-person surveys with directly affected businesses and residents to identify key protected characteristic groups of residents and business owners/ managers and insight into the circumstance of these groups should the CPO currently under consideration be made. The primary research also captured the views, opinions and ideas with respect to the wider regeneration project for both directly affected interests, and those likely to be affected by the wider regeneration proposals (outlined in **Chapter 5**). Following updates to the land assembly summary and Order Land, further surveys with new residential and business interests were undertaken in June 2025.

The desk-based review and analysis of the primary research findings informed the assessment of potential equality impacts associated with the regeneration of Old Oak for protected characteristic groups outlined in **Chapter 7**. The direct impacts of a potential CPO on affected residential and commercial interests were considered across the EqlA themes and objectives (see **Table 2-2**) including housing; employment, jobs and skills; neighbourhood and community; and health and wellbeing. The potential direct impacts of the CPO have been identified as loss of homes for owners and tenants, and loss of business and employment for those who own businesses and work in the area. Such impacts could have differential or disproportionate effects on specific equality groups. The indirect impacts on residents and businesses as a result of land and property acquisition were also considered under these themes. As of August 2025, the loss of a community centre that serves the Muslim community is the focus of the indirect impacts. The wider regeneration impacts on existing local residents, businesses, employees and visitors that may apply in the longer-term as a result of the Proposed Regeneration were considered within these themes in addition to transport and connectivity. The wider regeneration impacts of both construction and operation were assessed.

Following this assessment, an EqlA Action Plan has been developed in collaboration with OPDC. This focuses on the development of Resident and Business Relocation Strategies that consider and outline appropriate support being provided to directly affected interests. Further actions for OPDC to consider throughout scheme development are also outlined, such as a Community Engagement/ Communications Plan, housing strategies and construction and environmental management.

Progress towards these actions as of September 2025 has been outlined. This includes a Land Assembly and Relocation Strategy, Regeneration Strategy and Illustrative Masterplan. Tailored mitigation measures for the direct, indirect and wider regeneration impacts have also been set out.

As OPDC is in the early stages of scheme development, this EqIA focuses on the potential direct impacts associated with the CPO and indirect impacts associated with land and property acquisition whilst also considering longer-term impacts of the scheme itself. As the regeneration proposals develop, the wider regeneration impacts of regeneration and regeneration equality outcomes, and associated actions within the EqIA Action Plan, will become more refined and focused. This EqIA and the EqIA Action Plan (see **Chapter 8**) contained within should be considered as live documents that are updated and monitored at key stages of development for the Proposed Regeneration.

1. Introduction

1.1 Purpose

AECOM has been commissioned by Old Oak and Park Royal Development Corporation (OPDC) to provide an Equality Impact Assessment (EqIA) of the potential equality impacts on residents and businesses associated with a Compulsory Purchase Order (CPO) which may be required to facilitate the Old Oak regeneration (the Proposed Regeneration).

As a public authority, OPDC has a duty under the Equality Act 2010 (the Public Sector Equality Duty (PSED)) to ensure that when exercising its powers it has due regard to the need to eliminate unlawful discrimination, to advance equality of opportunity and foster good relations between those with a protected characteristic¹ and all others. This EqIA recognises the early stage of the Proposed Regeneration and demonstrates how OPDC has discharged the PSED and the actions that may be taken to support compliance as it progresses with the Proposed Regeneration.

An EqIA is a systematic assessment of the effects of plans, policies, or proposals on groups with protected characteristics as defined by the Equality Act 2010 as well as socio-economic disadvantage. The purpose of this EqIA is two-fold:

- To consider how the CPO would contribute to the realisation of equality effects of businesses and residents affected; and
- To understand the needs and requirements of the local community in terms of regeneration outcomes.

The consideration of potential direct and indirect equality impacts associated with the CPO process and wider impacts of regeneration and regeneration equality outcomes on the Old Oak area are outlined in **Chapter 7**. This draws on evidence from secondary data sources as well as primary research undertaken for the purpose of the EqIA in August/September 2024 and in June 2025.

A Draft EqIA was developed in January 2025 to provide OPDC with an early indication of potential direct, indirect and wider equality issues and actions to minimise any negative impacts or enhance any positive impacts identified. This EqIA reflects updates to land acquisition and progress towards the EqIA Action Plan as of September 2025. This EqIA will support the making of the CPO in September 2025.

As OPDC is in the early stages of scheme development, this EqIA focuses on the potential direct impacts associated with the CPO and indirect impacts associated with land and property acquisition, whilst also considering longer-term impacts of the Proposed Regeneration itself. As the regeneration proposals develop, the wider impacts of regeneration and regeneration equality outcomes, and associated actions within the EqIA Action Plan, will become more refined and focused. Thereby, the EqIA and EqIA Action Plan should be considered as live documents that are updated and monitored at key stages of development for the Proposed Regeneration.

1.2 Context

1.2.1 The Proposed Regeneration

The Mayor of London established OPDC in 2015 as a 'Mayoral Development Corporation' under the powers of the Localism Act (2011) to oversee the regeneration of the Old Oak opportunity area. OPDC has a number of key aims, outlined in OPDC's Local Plan (2018 to 2038)², including:

- Transforming one of London's most inaccessible areas into a well-connected, world-class transport interchange;

¹ Protected characteristics are defined under the Equality Act 2010: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation and marriage/civil partnership.

² OPDC (2022) OPDC Local Plan 2018 to 2038. Available at: [opdc local plan 2022 june 2022 including appendix 0.pdf \(london.gov.uk\)](https://www.opdc.gov.uk/local-plan-2018-to-2038)

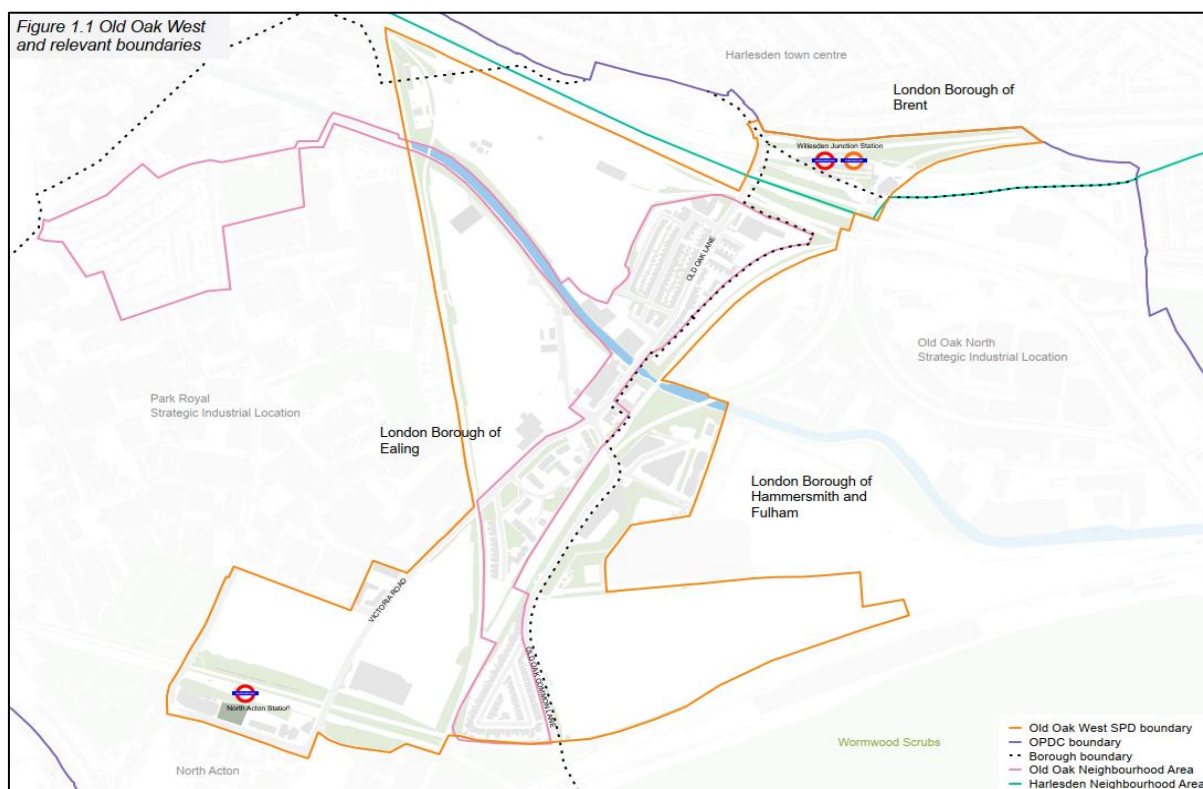
- Enabling delivery of new housing and commercial development, surrounded by sustainable and thriving neighbourhoods and valued open space;
- Protecting, strengthening and intensifying Park Royal and Old Oak; and
- Protecting and improving Wormwood Scrubs.

Within this, the Old Oak opportunity area spans over 155 hectares covering three local authorities: Ealing, Hammersmith & Fulham, and Brent, and broadly follows the length of Victoria Road and Old Oak Common Lane, between North Acton and Willesden Junction rail stations, and is bound by Wormwood Scrubs to the south-east and Scrubs Lane to the north-east. The specific Old Oak study area is shown in **Figure 1-1** below (outlined in orange).

Old Oak comprises around 75 acres of developable land owned by public sector stakeholders which includes those currently in use as HS2 construction sites for the new Old Oak Common station and Park Royal, which is one of the UK's largest industrial estates. There are also varied residential typologies including low density two storey Victorian, Edwardian and interwar housing, three-four storey apartment buildings along Shaftesbury Gardens and at Kildun Court and new high-density housing at The Collective, Oaklands Rise and 80 Goodhall Street.

The Grand Union Canal, railway lines, embankments, freight terminals and varied town centre uses including Fisherman's Arms Public House and Old Oak Café feature in the study area. Future development in Old Oak will be centred around the planned Old Oak Common Station as a key station on the High Speed 2 (HS2) rail project.

Figure 1-1: Old Oak study area



Source: Old Oak West Supplementary Planning Document³

³ London Assembly (2024). Old Oak West Supplementary Planning Document. Available at: [Old Oak West Supplementary Planning Document \(SPD\) | London City Hall](#)

In 2023, OPDC held engagement with local communities to gather feedback on the Old Oak area, informing the adopted Old Oak West supplementary planning document.⁴ Old Oak West is largely the same as the area now known as Old Oak and which is the subject of this EqlA. Building on this feedback and the supplementary planning document, OPDC developed a set of emerging principles for the area which formed the foundations of the future Regeneration Strategy and masterplanning. These include:

- **A new east-west bridge:** connecting the new Old Oak Common Station to North Acton and Park Royal to greatly improve connectivity, promoting active travel reducing pedestrian journey times.
- **A high street for every day:** connecting Harlesden to North Acton, lined with shops, services, amenities and workspaces, designed for pedestrians and cyclists, with trees and greening and space for the community.
- **Two new neighbourhoods:** building on and celebrating the distinctive characteristics of Old Oak, with a Canalside neighbourhood to the north, made up of shops, a new local park and amenities, servicing existing and new residential communities, and a mixed-use area to the south, a major new town centre with workspace and highstreets close to the new Old Oak Common station.

OPDC has since produced a Regeneration Strategy⁵, which was approved by its Board in February 2025. This Strategy outlines OPDC's vision for the comprehensive regeneration of Old Oak and will guide the regeneration of Old Oak over the next 25 years.

This Strategy outlines the six regeneration objectives that underpin the actions OPDC will take to deliver the Proposed Regeneration as follows:

- **Build a place to call home** - deliver a diverse mix of high-quality, genuinely affordable homes that support community cohesion and meet the needs of people at different life stages;
- **Make a place to be proud of** - create a distinctive and inclusive neighbourhood with vibrant public spaces, cultural venues, and community facilities that reflect local identity and heritage;
- **Drive inclusive economic growth** - generate local employment, supporting skills development, and fostering a dynamic business environment that benefits residents and attracts investment;
- **Create a thriving environment** - prioritise sustainability by enhancing green infrastructure, promoting active and public transport, and improving environmental quality and climate resilience;
- **Deliver at pace** - accelerate development through strong partnerships, efficient planning, and early delivery of key projects to build momentum; and
- **Ensure value** - maximise public benefit, ensuring transparency in decision-making, and securing long-term stewardship to maintain and reinvest in the area;

The Regeneration Strategy outlines the vision for the regeneration of Old Oak, including: enabling the construction of up to 9,000 new and affordable homes, approximately 150,000-200,000 sq. m of new commercial and employment space, 1km of canal enhancements, up to 20 acres of high-quality publicly accessible open space, 6 acres of parks and green space and new high streets with shops, cafes, restaurants and local services and amenities.

OPDC has published an Illustrative Masterplan to provide a spatial representation of how the Proposed Regeneration could be delivered. Stakeholder and public consultation on the Illustrative Masterplan was undertaken from 17th-22nd May 2025 in the form of local drop-in sessions and an online event.⁶ The Illustrative Masterplan was endorsed by the OPDC Board on 10 July 2025.

⁴ London Assembly (2024). Old Oak West Supplementary Planning Documents. Available at: [Old Oak West Supplementary Planning Document \(SPD\) | London City Hall](#)

⁵ OPDC (2025). OPDC Regeneration Strategy. Available at: [OPDC Regeneration Strategy | London City Hall](#) [accessed 20/05/25]

⁶ OPDC (2025). Old Oak: Illustrative Masterplan. Available at: [Old Oak | OPDC have your say](#) [accessed 20/05/25].

1.2.2 Land acquisition and Compulsory Purchase

In order to secure all the land and rights required to deliver the regeneration of Old Oak, OPDC has decided to use of its compulsory purchase powers to facilitate land assembly.

Since 2023, OPDC has been working with landowners and occupiers to acquire the required land by agreement. A Land Assembly and Relocation Strategy⁷ sets out principles that OPDC apply in engaging with existing owners and occupiers of land and property within the proposed Old Oak regeneration area.

The Old Oak study area includes land where the use of compulsory purchase powers will be required ('Order Land') which is identified in **Figure 1-2**. The Order Land includes publicly owned land, which comprises approximately 94% of the total area of Old Oak and the remaining 6% of land is privately held in disparate ownerships. There are also several private occupiers on the publicly owned land.

In **Figure 1-2**, the blue shaded areas indicate land in which new rights are to be permanently acquired to facilitate construction works and the Proposed Regeneration. The pink shaded areas indicate land to be acquired under the CPO, including approximately:

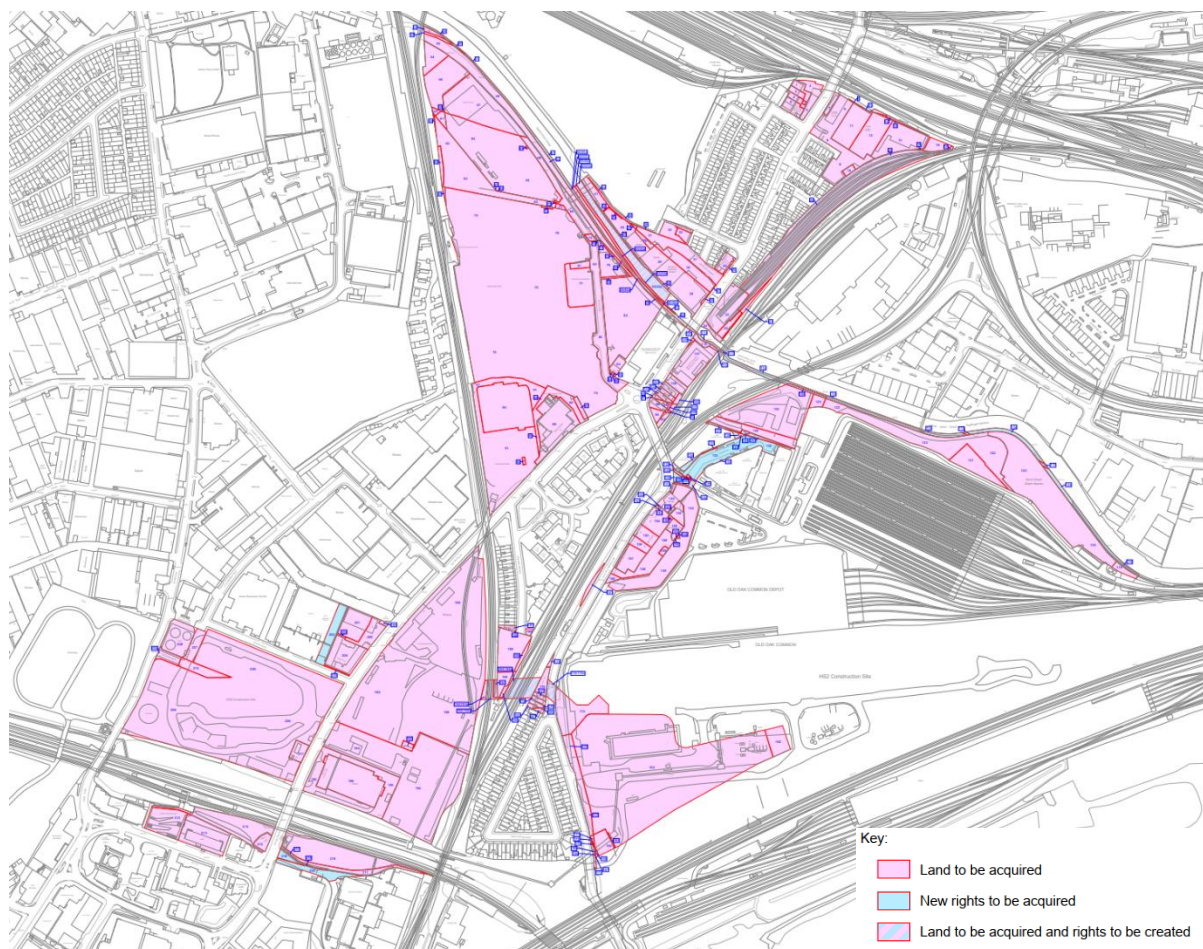
- 21 studio flats of temporary accommodation⁸;
- 25 residential properties;
- 35 businesses;
- 2 car parks; and
- Current HS2 work sites.

Pursuant to the approval of an Outline Business Case in March 2024, OPDC, Ministry of Housing, Communities and Local Government, Department for Transport, Network Rail and HS2 committed to enter into an agreement for the release of land to deliver the Proposed Regeneration. Advanced negotiations of this agreement are ongoing.

⁷ OPDC (2025). OPDC Board Meeting Minutes: Appendix 2 OPDC Land Assembly and Relocation Strategy. Available at: [\(Public Pack\)Agenda Document for OPDC Board, 05/02/2025 14:00](#) [accessed 20/05/25].

⁸ The temporary accommodation is let to the London Borough of Hammersmith and Fulham (LBHF) to provide temporary housing for residents at risk of homelessness whilst LBHF looks into other longer term housing options for these residents.

Figure 1-2: Order map for the Proposed Regeneration



1.3 Report structure

Following on from this introduction section, the remainder of the report is structured as follows:

- **Chapter 2:** Methodology - provides an overview of approach to and scope of desk-based review, primary research, assessment of impacts and the EqlA Action Plan;
- **Chapter 3:** Policy and legislation review - providing context through relevant national, regional and local policy and legislation associated with equalities and planning;
- **Chapter 4:** Evidence review - comprises a capture of key demographic and population data and key local themes and issues to form an understanding of the local and wider community;
- **Chapter 5:** Primary research findings - summary of findings from the direct business and resident and indirect business and resident surveys undertaken for the purpose of the EqlA;
- **Chapter 6:** Stakeholder consultation – summary of findings from the stakeholder consultation undertaken for the purpose of the EqlA;
- **Chapter 7:** Assessment of impacts - an assessment of impacts and equality effects informed by the evidence base and findings from primary research;
- **Chapter 8:** EqlA Action Plan - an outline action plan developed in collaboration with OPDC identifying actions to manage and mitigate equality impacts; and
- **Chapter 9:** Conclusions and next steps.

2. Methodology

2.1 Scoping Report

An EqIA Scoping Report for the Old Oak CPO was produced in October 2024⁹ with the purpose of outlining the scope of components to inform the full EqIA. The approach to undertaking the Scoping Report followed a three-stage process:

1. **Desk-based review** – including relevant national, regional, and local policies and legislation, planning documents, and documents associated with the Old Oak regeneration. This includes a review of the Old Oak equalities baseline produced by Arup in 2023. This desk-based review has directly informed Chapter 3 and 4 of this report.
2. **Site familiarisation visit** – a site visit was undertaken in May 2024, accompanied by the OPDC client team, to gain first-hand insight into the project area, local businesses, residences and key locations within the Old Oak site.
3. **Scope of EqIA and next steps** – the Scoping Report outlined a structure and scoping of themes and issues for the full EqIA, informed by the evidence gathered in the desk-based review. It also set out the planned approach for primary research.

2.2 Primary research

Further primary data collection was required to provide more detailed information on those potentially directly affected by the CPO as well as others living in the area. The research aimed to identify:

- Key protected characteristic groups of residents and business owners/ managers in the area;
- Insight into the circumstance of residents and businesses should the CPO currently under consideration be made, including preference in relocation; and
- Views, opinions and ideas with respect to the wider regeneration project for different groups.

2.2.1 Approach to surveys

The primary research took the form of in-person surveys with businesses and residents. These were carried out by AECOM's primary research team between **27th August - 20th September 2024**. The content of the surveys was developed in partnership with OPDC and all interests were approached up to three times to participate in the surveys. The research comprised the following:

- **Direct surveys:** These surveys were designed for those who will be potentially directly impacted by the CPO, including all affected residential, commercial and community interests located within the pink areas of the Order Land shown in **Appendix A**.¹⁰
- **Wider regeneration surveys:** These surveys were designed for those who are not likely to be subject to acquisition but currently live in the areas located within 50m of the Order Land in **Appendix A**. The primary research aimed to collect 50 surveys from a sample of 100 residential properties in a 50m buffer outside of the red line boundary. The purpose of these surveys was to get a better understanding of the demographic breakdown of those living in or near the Old Oak site, their views on the regeneration project and to identify priorities for regeneration across different groups.

The need to represent the views and opinions of protected characteristic groups was acknowledged when sampling interests for the wider regeneration surveys; for example, Bashley Road Travellers Site. A particular effort was made to undertake these surveys in a way that accommodated the needs of the group.

⁹ Scoping report was drafted in July 2024 and finalised in October 2024.

¹⁰ For the purpose of the surveys, we used the indicative boundary from July 2024. This was the most up to date Order Map as of 27th August 2024 and was subject to changes following primary research.

Prior to primary research taking place, OPDC sent a soft-landing letter to all residents within Old Oak in the week commencing 5th August 2024 outlining facts and upcoming events relating to the regeneration project, including AECOM's equality surveys. Following this communication, AECOM sent a notification letter to all directly affected businesses and residents and selected indirectly affected businesses and residents in the week commencing 12th August 2024. This explained the purpose of the research and timing of surveys and were aimed to encourage participation (see **Appendix B**).

2.2.2 Additional surveys

Since the initial surveys were carried out, changes have been made to the Order Land (shown in **Figure 1-2**). A further 6 additional business occupiers and 6 residential occupiers were identified as being directly impacted by the CPO.

AECOM's primary research team undertook in-person surveys with these additional business and residential interests in June 2025.

2.2.3 Stakeholder consultation

In addition, 15 key stakeholders were identified by OPDC and contacted via email for comment on the potential impact the regeneration could have on the organisations' activities, employees and/ or customers, especially those with protected characteristics. These stakeholders were:

- Canal & River Trust;
- The Secretary of State for Transport;
- Ealing Council;
- Brent Council;
- Hammersmith and Fulham Council;
- Transport For London;
- Network Rail Infrastructure Limited;
- Rail for London Limited;
- London Underground Limited;
- London Bus Services Limited;
- Arriva Rail London Limited;
- Places for London Limited;
- Southern Electric Power Distributions plc;
- SSE Services plc; and
- UK Power Networks

All participants of the primary research were informed that the data they provided would only be used for the purpose of the CPO EqlA and to help identify equitable regeneration outcomes.

2.2.4 Primary research analysis

Overall, 97 responses were received across the direct and wider regeneration surveys. **Table 2-1** below shows a breakdown of responses per survey.

Table 2-1: Breakdown of direct and wider regeneration survey responses

Survey	Completed Interviews
Direct Business	22
Direct Resident	19
Wider Businesses	2
Wider Residents	54

Primary research analysis was composed of three stages:

- **Quantitative Data Analysis:** Each interviewer's data was checked and cross-checked against other interviewers. Data was imported into Statistical Package for the Social Sciences (SPSS) where additional data cleaning and validation were completed.
- **Analysis and reporting:** Frequencies of all variables were run to check for cleaning requirements and/ or for analysis of outputs. The data was also cross analysed by demographical information such as age, gender, ethnicity to identify any significant differences.
- **Coding for analysis:** Coding based on survey responses was undertaken to analyse qualitative data. All codes were used to analyse key themes and insight from the survey responses.

Findings of the primary research are summarised within **Chapter 5** of this report. Data has been presented at an area/group level and not on an individual basis to comply with data protection and confidentiality requirements.

2.3 Assessment of impacts

An assessment of equality impacts was undertaken using information gathered through the desk-based review and primary research activities. The assessment considers the potential impacts on protected characteristic groups defined in the Equality Act 2010 as:

- **Age:** This refers to persons defined by either a particular age or a range of ages;
- **Disability:** A disabled person is someone who has a physical or mental impairment (lasting more than a year) that has a substantial adverse effect on their ability to carry out normal day-to-day activities;
- **Gender Reassignment:** This refers to a person who is proposing to undergo, is undergoing, or has undergone a process for the purpose of reassigning their gender identity;
- **Marriage and Civil Partnership:** Marriage can be between a man and a woman or between two people of the same sex. Civil partners must not be treated less favourably than married couples;
- **Pregnancy and Maternity:** Pregnancy is the condition of being pregnant and expecting a baby. Maternity refers to the period after the birth. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth; **Race:** Under the Equality Act 2010 race includes colour, nationality (including citizenship) and ethnic or national origins;
- **Race:** Under the Equality Act 2010 race includes colour, nationality (including citizenship) and ethnic or national origins;
- **Religion or Belief:** Religion means any religion and a reference to religion includes a reference to a lack of religion. Belief means any religious or philosophical belief and a reference to belief includes a reference to a lack of belief;
- **Sex:** This refers to a man or to a woman, or to a group of people of the same sex; and,

- **Sexual Orientation:** this means a person's sexual orientation towards persons of the same sex, persons of the opposite sex, or persons of either sex.

Although income is not classed as a protected characteristic under the Equality Act 2010, the assessment of impacts also considers the additional impact of disproportionate and differential effects on those groups with protected characteristics from low-income households.

The assessment considers:

- **Differential impacts** – i.e. an impact that affects members of a protected characteristic group differently from the rest of the general population because of specific needs, or a recognised vulnerability or sensitivity associated with their protected characteristic.
- **Disproportionate impacts** – i.e. an impact that has a proportionately greater effect on a protected characteristic group than on the general population overall within Old Oak due to a greater presence of that group. In some cases, protected characteristic groups may be subject to both differential and disproportionate equality effects.

In addition to assessing the equality impacts on those directly affected by the potential CPO and indirectly affected by land and property acquisition, the assessment also identifies the potential negative and positive wider regeneration impacts on other businesses, residents and visitors to the area. It also includes wider equality outcomes that may be a result of the regeneration proposals (which may be realised as a result of the CPO). Therefore, three types of impacts/ outcomes are considered in the assessment framework:

- **Direct Impacts:** These include potential direct impacts of the CPO on affected residential and commercial interests;
- **Indirect Impacts:** This includes where acquisition agreements have been made (as of September 2025) with affected residential and commercial interests, but identified residual impacts for protected characteristic groups remain as a result of the acquisition; and
- **Wider Regeneration impacts:** The wider impacts of the regeneration on existing local residents, businesses, employees and visitors (not subject to acquisition or CPO).

The equality impacts associated with the above have been assessed using a set of key equality themes and objectives. These have been aligned with principles set out in the Old Oak West Supplementary Planning Document (SPD) that should be considered in the development of regeneration proposals; further detail on the SPD is outlined in **Section 3.4**.¹¹ This assessment framework is set out in **Table 2-2**.

¹¹ OPDC (2024). Old Oak West Supplementary Planning Document. Available at: [Old Oak West Supplementary Planning Document \(SPD\) | London City Hall](#)

Table 2-2: EqlA assessment framework

EqlA theme and objective	Aligned SPD Principles
Housing Inclusive and accessible housing for all	HP1 Housing: contribute to the delivery of new homes across Old Oak ranging in tenure, type and size to meet diverse housing needs.
Employment, jobs and skills Deliver employment and training opportunities for all	EP1 Jobs and local access to training, employment and economic opportunities. SP5 A strong, resilient and diverse economy, which allows existing businesses to thrive and grow and supports the introduction of new businesses to the area: a fair economy across the OPDC area will provide opportunities for locals and Londoners to access a range of employment opportunities across a range of sectors and skill levels.
Neighbourhood and community Placemaking to provide safe, clean and accessible facilities for communities	TCCP1 Town centre uses and areas: deliver wide range of town centre and community uses that meet the needs of local people. TCCP2 Social infrastructure and sports facilities: deliver social infrastructure that is high quality, accessible, inclusive and collocated with publicly accessible open spaces to support social interaction.
Health and wellbeing Access to key services and facilities for improved community health and wellbeing	GGP1 Good Growth and Social Value: contribute to delivering Social Value by improving health and wellbeing, fairness and day-to-day quality of life. EUP2 Open spaces locations and design: deliver and/or positively contribute towards a well-designed open space network that provides for the needs of people living, working and visiting Old Oak.
Transport and connectivity Deliver equitable access to transport and enhanced connectivity for the local community	TP1-TP6 Transport: including <ul style="list-style-type: none"> • Contribute to safe, inclusive and accessible walking, cycling, bus and street network • New and enhanced connections within OPDC development area • Promote use of the Grand Union Canal for passengers, leisure and freight transport • Deliver Old Oak Common Station as an exceptionally designed 21st century station and transport interchange integrated into the wider movement network • Present Willesden Station, North Acton and the potential Old Oak Common Lane Station as improved high-quality stations

2.4 EqlA Action Plan

An EqlA Action Plan has been developed in collaboration with OPDC. The Action Plan identifies actions to manage and mitigate the potential negative equality effects identified through the impact assessment and identify opportunities to enhance positive impacts and equality of opportunity. This will support OPDC in meeting the equality objectives and inform future stages of proposed development.

Where possible, the Action Plan includes timescales and a responsible owner for each action. These timescales acknowledge that OPDC is currently in the early stages of scheme development and

thereby prioritises actions to address the direct impacts associated the CPO while also identifying further recommendations which will be refined as the regeneration proposals are developed.

The EqlA and EqlA Action Plan should be considered as live documents that are updated, refreshed and the actions within them monitored on a regular basis. This should include a monitoring update on the status of identified potential impacts and associated mitigation, which may require updates both to assessment of the impacts and recommendations relating to the proposed mitigation measures. In particular, as the regeneration proposals develop, the wider regeneration impacts and regeneration equality outcomes will become more focused and the accompanying further recommendations set out in the EqlA Action Plan will require updates.

A Draft EqlA and EqlA Action Plan were developed in January 2025 to provide OPDC with an early indication of potential equality effects and actions to minimise any negative impacts or enhance any positive impacts identified. In line with the above, this EqlA reflects updates to the Draft EqlA and EqlA Action Plan as of September 2025, including updates to land acquisition and progress towards further recommendations and actions within the Action Plan.

3. Legislation, policy, and planning review

3.1 Legislation

3.1.1 Equality Act 2010 and Public Sector Equality Duty (PSED)

The Equality Act 2010 is a major piece of UK legislation which provides the framework to protect the rights of individuals with the following nine protected characteristics (as outlined in **Section 2.3** of this report) against unlawful discrimination and to advance equal opportunities for all.

Section 149 of the Equality Act sets out the PSED to which OPDC, as a public authority, is subject in carrying out all its functions, including in the exercise of its CPO powers. Those subject to the PSED must, in the exercise of their functions, have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act;
- Advance equality of opportunity between people who share a protected characteristic and those who do not; and
- Foster good relations between people who share a protected characteristic and those who do not.

These are sometimes referred to as the three aims or arms of the PSED. The Act explains that having due regard for advancing equality involves:

- Removing or minimising disadvantages suffered by people due to their protected characteristics;
- Taking steps to meet the needs of people from protected groups where these are different from the needs of other people; and
- Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low.

The Act describes fostering good relations as tackling prejudice and promoting understanding between people from different groups. It states that compliance with the duty may involve treating some people more favourably than others.

Public authorities also need to have due regard to the need to eliminate unlawful discrimination against someone because of their marriage or civil partnership status. This means that the first arm of the duty applies to this characteristic, but that the other arms (advancing equality and fostering good relations) do not apply.

3.1.2 Human Rights Act 1998

The Human Rights Act 1998 incorporates the rights from the European Convention on Human Rights (the 'Convention') into UK law, allowing individuals in the UK to enforce their human rights in domestic courts and holding public bodies accountable for respecting and protecting human rights.

The Act includes 16 civil and political rights, and three additional rights from the First and Thirteenth Protocol, that must be followed by public authorities and public bodies when carrying out public functions. The following Articles are relevant to the Secretary of State's decision as to include powers of compulsory acquisition:

- **Article 1 of the First Protocol¹²: Protection of Property** – no one can be deprived of their possessions except in public interest and subject to the conditions provided for by law and by the general principles of internal law.

¹² The First Protocol to the European Convention on Human Rights (ECHR) is an additional legal instrument that supplements the original Convention. It was adopted in 1952 and adds three important rights that were not included in the original 1950 Convention.

- **Article 6 of the Convention: Right to a fair trial** – in the determination of his civil rights and obligations, everyone is entitled to a fair and public hearing within a reasonable time by an independent and impartial tribunal established by law
- **Article 8 of the Convention: Right to Respect for Private and Family Life** – protects private and family life, home and correspondence. No public authority can interfere with these rights except in accordance with the law, and so far, as is necessary in the interest of national security, public safety or the economic wellbeing of the country.

3.1.3 Compulsory Purchase Process Guidance 2025

The Ministry of Housing, Communities and Local Government has published guidance on the compulsory purchase process for England.¹³ Guidance outlines that compulsory purchase powers enable acquiring authorities to compulsorily purchase land where there is a compelling case in the public interest, as decided by the confirming authority.

The acquiring authority does not have the powers to compulsorily acquire land until the CPO is confirmed by the relevant confirming authority. However, they can acquire by agreement at any time and the general presumption is that they should endeavour to do so before acquiring by compulsion. Thereby, when preparing a CPO, the acquiring authority is expected to demonstrate that it has taken reasonable steps to understand the impact the CPO and acquisition of affected interests may have on owners and occupiers through direct engagement and attempt the acquisition by agreement of all the land and rights included in the CPO.

The acquiring authority should also demonstrate that it has considered how to mitigate any negative impacts arising from the use of compulsory purchase powers and the acquisition of land or property interests. These mitigations may be part of existing CPO and compensation frameworks, including financial compensation, or may involve specific measures tailored to address identified issues, such as relocation support or charters for affected residents and businesses. Identifying potential impacts early and planning appropriate mitigations can support constructive engagement with affected parties, potentially leading to voluntary agreements and reducing the number of objections to the CPO.

Guidance on the compulsory purchase process outlines that all public sector acquiring authorities must consider the PSED and pay due regard to the three aims of the Equality Act 2010 outlined above. For example, the guidance acknowledges that an important use of compulsory purchase powers is to help regenerate run-down areas. Although low income is not a protected characteristic in itself, it is common for people from ethnic minorities, the elderly or people with a disability to be over-represented in low-income groups. As part of the PSED, acquiring authorities must have due regard to the need to promote equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it. This means that the acquiring authority may need to develop a process which promotes equality of opportunity by addressing particular problems that people with certain protected characteristics might have (e.g. making sure that documents are accessible for people with sight problems or learning difficulties and that people have access to advocates or advice).

3.1.4 Localism Act (2011)

Local authorities have compulsory purchase powers under the Acquisition of Land Act 1981, the Town and Country Planning Act 1990 and other specific Acts of Parliament in order to promote development and regeneration. As a Mayoral Development Corporation, OPDC has specific compulsory purchase powers contained within S207 of the Localism Act 2011.

The Localism Act ('the Act') is aimed at redistributing decision-making from central government to local authorities and communities under four key areas:

- **New Freedoms for Local Government:** Local authorities gained more autonomy through the Act, including general power of competence, allowing them to respond to what local people want;

¹³ Ministry of Housing, Communities & Local Government (2025). Guidance on the compulsory purchase process. Available at: [Guidance on the Compulsory Purchase Process](#)

- **Community Rights:** the Act introduced new rights for community, such as the ability to bid for and run local services and assets;
- **Planning Reform:** the Act aimed to make the planning system more democratic and effective, giving local people more influence over housing and planning decisions; and
- **Housing Decisions:** the Act ensured that decisions about housing were taken locally, including reforms to social housing.

In particular, the Act specifically grants more authority over housing and regeneration to locally elected representatives in London. It enables the elected Mayor to take over housing investment activities from the Homes and Communities Agency and to continue the economic development efforts previously managed by the London Development Agency.

OPDC is a Mayoral Development Corporation (MDC) set up under Part 8, Chapter 2 of the Localism Act 2011 with the object, as set out in section 201(1), of securing the regeneration of its area.

Section 207(2) of the Localism Act 2011 provides OPDC with the ability to promote a CPO to compulsory acquire the land and rights necessary for the purpose of securing the regeneration of its area.

3.2 National policy

3.2.1 National Planning Policy Framework (2024)¹⁴

The National Planning Policy Framework (NPPF) was adopted in July 2018 and updated with minor revisions in February 2019, July 2021, September 2023, December 2023 and most recently, December 2024.

The NPPF (2024) consolidates the Government's economic, environmental and social planning policies for England into a single document and describes how it expects these to be applied. The NPPF supersedes the majority of National Planning Policy Guidance and Planning Policy Statements and provides overarching guidance on the Government's development aims.

While the NPPF does not contain specific guidance on equalities, it does emphasise the importance of sustainable development and the need to support a healthy and just society. This is reflected in the key dimensions of sustainable development which relate to the economic, social and environmental roles of the planning system:

- The economic role contributes to building “a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure”;
- The social role supports “strong, vibrant and healthy communities by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect the current and future needs and support communities’ health, social and cultural well-being”; and
- The environmental role contributes to protecting and enhancing the “natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy”.

The NPPF identifies a range of planning policies that local planning authorities should consider when carrying out its function. Those of relevance to the regeneration planned at Old Oak, include, but are not limited to:

¹⁴ Department for Communities and Local Government (2024). National Planning Policy Framework. Available at: [National Planning Policy Framework](#)

- **Delivering a sufficient supply of homes:** significantly boost the supply of homes by ensuring local plans proactively meet identified housing needs, including affordable and specialist housing, through a mix of deliverable and developable sites. NPPF also promotes the efficient use of land, prioritising brownfield development and supporting diverse housing options to meet the needs of all community groups.
- **Building a strong, competitive economy:** supporting sustainable economic growth by creating the conditions for businesses to invest, expand, and adapt, particularly in areas with potential for regeneration and innovation. NPPF encourages planning policies that are responsive to local business needs, promote infrastructure development, and foster a diverse and resilient economy across both urban and rural areas.
- **Ensuring the vitality of town centres:** support the long-term vitality and viability of town centres by promoting their adaptation and diversification in response to changing economic and social trends. It encourages planning policies that prioritise town centre uses, support mixed-use developments, and enhance accessibility, attractiveness, and resilience to ensure these areas remain vibrant community hubs.
- **Promoting health and safety communities:** nurture inclusive communities by encouraging mixed-use developments and vibrant public spaces that foster social interaction, ensure access to essential facilities, and provide high-quality open spaces for recreation and wellbeing
- **Promoting sustainable transport:** promote sustainable transport by encouraging development that reduces the need to travel, supports active travel and public transport, and integrates transport and land use planning. NPPF encourages planning policies that prioritise pedestrian and cycle movements, improve accessibility for all, and ensure transport infrastructure supports sustainable growth.

3.3 Regional policy

3.3.1 London Plan (2021)¹⁵

The London Plan was adopted with amendments in March 2021. The London Plan (2021) is currently undergoing its five year review process as part of the Greater London Authority's efforts 'Towards a New London Plan'. Consultation on a new London Plan is expected to take place in 2026.¹⁶

The Plan includes strategic and planning policies to encourage equal life chances for all, in recognition of social inequalities existing within the city. A number of policies outlined in the Plan are relevant to the Proposed Regeneration, including tackling deprivation, promoting equality and enabling different groups to share in the benefits of development, specifically:

- **Policy GG1:** Building Strong and Inclusive Communities which builds on the idea that "good growth is inclusive growth" and requires that planning and development involves community and stakeholder engagement, provides access to good quality community spaces, and supports the creation of a London for all Londoners, where all people including protected characteristic groups (PCGs) are able to move around and enjoy the city's opportunities with ease, creating a welcoming environment that everyone can use confidently, independently, and with choice and dignity, avoiding separation or segregation;
- **Policy SD 10:** Strategic and Local Regeneration which requires development and regeneration opportunities address inequality and deprivation across London, by allocating Strategic Areas of Regeneration and Local Areas of Regeneration. The policy also highlights the need to work collaboratively with local stakeholders and understand local community's needs so that regeneration can address the local area's most urgent issues;

¹⁵ Greater London Authority (2021). London Plan 2021: The Spatial Development Strategy for Greater London. Available at: london.gov.uk/sites/default/files/the_london_plan_2021.pdf

¹⁶ Mayor of London (no date). The next London Plan. Available at: [The next London Plan | London City Hall](https://www.london.gov.uk/what-we-do/what-we-are-doing/the-next-london-plan) [accessed 16/05/25].

- **Housing policies H1 – H16** concerning housing provision, affordable housing provision, mixed and balanced communities, housing choice and provision of associated play facilities, are all relevant to equal opportunities;
- **Design policies D6, D7 and D7**, which relate to accessible design and tall buildings, which are especially relevant here; and
- **Employment policy E11:** Skills and Opportunities for all requires that strategic development proposals should support local employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases, including through Section 106 obligations where appropriate. The Plan notes continuing large inequalities in access to jobs and levels of worklessness, and that low pay and gender and ethnicity pay gaps are critical issues.

The London Plan also identifies Old Oak and Park Royal as an Opportunity Area associated with the development of HS2. OPDC is responsible for driving forward regeneration in this area to optimise economic growth, create an attractive new town centre and embed the new Old Oak Common station connecting to HS2, the Elizabeth line and National Rail.

3.3.2 Inclusive London: Mayor's Equality, Diversity and Inclusion Strategy (2018)¹⁷

The Mayor's Equality, Diversity and Inclusion Strategy (EDIS) was published in May 2018. The strategy sets out how inequalities, barriers and discrimination experienced by groups protected by the Equality Act will be addressed by tackling issues such as poverty and socio-economic inequality, as well as the challenges and disadvantage facing London can be a fairer, more equal, integrated city where all people feel welcome and able to fulfil their potential. The strategy sets out 33 equality, diversity and inclusion objectives.

3.3.3 The Mayor's Equality, Diversity, and Inclusion Strategy Objectives (2022)¹⁸

In November 2022 the Mayor published a new set of equality objectives to replace those published in 'Inclusive London' in 2018. They include:

- To increase the provision of genuinely affordable homes for the benefit of those groups and communities that are most likely to live in overcrowded, poor quality or unaffordable housing. This objective includes a target of 50% affordability for all new homes across London.
- To increase the number of homes that meet Londoners' diverse housing needs including, year-on-year, the pace of provision of affordable specialist and supported housing.
- To ensure that investment in London's high streets is delivered in a way that can benefit the most deprived parts of London and can meet the expressed priorities of society's most marginalised or underrepresented groups.
- To address the specific barriers faced by those groups of Londoners most likely to experience financial hardship, helping them understand and access their entitlements and available support.
- To address the reasons for health inequalities that cause some groups to experience poorer physical and mental health outcomes.
- That Londoners from all walks of life feel heard and see themselves reflected in the public realm.

¹⁷ Greater London Authority (2018). Mayor's Equality, Diversity and Inclusion Strategy. Available at: [The Mayor's strategy for equality, diversity and inclusion | London City Hall](#)

¹⁸ Mayor of London (2022) The Mayor's Equality, Diversity, and Inclusion Strategy Objectives. Available at: [The Mayor's Equality, Diversity, and Inclusion Strategy Objectives \(2022\) | London City Hall](#)

3.4 Local planning and other policies

3.4.1 OPDC Local Plan 2018 to 2038¹⁹

The Old Oak and Park Royal Development Corporation (OPDC) was established by the Mayor of London in April 2015 as a Mayoral Development Corporation under the Localism Act 2011. It is the second of its kind in London. The primary aims of the OPDC is to transform one of London's most inaccessible areas into a well-connected, world-class transport interchange, enable new housing and commercial developments, protect and intensify Park Royal and Old Oak, and improve Wormwood Scrubs.

As the local planning authority for the Old Oak Park Royal Opportunity Area, OPDC is responsible for plan-making including the development of a Local Plan. The OPDC Local Plan contains several key themes, including:

- **Transport hub:** Old Oak will become a major transport hub, providing connections through the new Old Oak Common station, which will include High Speed 2 (HS2), Elizabeth Line, and Great Western services. This infrastructure will enhance connectivity and support the area's regeneration.
- **Housing:** The OPDC Local Plan aims to maximise housing supply, protect existing residential units, and promote conversions under strict conditions. Housing policies emphasise family housing, efficient use of vacant properties, and strategic regeneration, ensuring alignment with local and London-wide housing needs. OPDC will also safeguard the existing Bashley Road Gypsy and Travellers Site and work with Ealing Borough Council to enhance the site where required.
- **Employment:** The plan aims to create 56,250 jobs by 2048, protect and intensify industrial areas, and develop a major commercial centre around Old Oak Common Station. It supports local employment and training, ensuring new developments provide job opportunities and benefit local residents.
- **Environment and utilities:** The plan emphasises the need to create sustainable, resource-efficient developments to support high-quality living and biodiversity. Key policies focus on enhancing open spaces, urban greening, water management, air quality, noise reduction, waste management, and minimising carbon emissions. The chapter aligns with strategic goals for integrated utility provision, promoting a resilient natural and built environment.
- **Town centre and community uses:** The plan recognises the importance of high-quality town centres and community facilities, and providing convenient access to them, in creating lifetime neighbourhoods that reduce the need to travel and contribute to a layered city where social interaction is encouraged alongside leisure activities that improve health and wellbeing.

OPDC will work with its partners, including the Boroughs of Brent, Ealing and Hammersmith & Fulham, to implement regeneration projects that generate change and meet the aims of the Corporation.

OPDC plans to update the Local Plan once the Greater London Authority publishes an updated London Plan to maintain compliance with regional planning policy.

3.4.2 Old Oak West Supplementary Planning Document (SPD)²⁰

The Old Oak West Supplementary Planning Document (SPD) recognises the Old Oak West development area (which is largely the same as the Old Oak area) and outlines a comprehensive plan for regeneration. The document serves as a guide for stakeholders, including developers and local authorities, to ensure cohesive and sustainable growth in the region. The SPD is structured to reflect the themes of the OPDC's Local Plan and aims to foster better placemaking by integrating sustainable

¹⁹ OPDC (2022) OPDC Local Plan 2018 to 2038. Available at: [opdc_local_plan_2022_june_2022_including_appendix_0.pdf](https://www.opdc.org.uk/media/1000/opdc_local_plan_2022_june_2022_including_appendix_0.pdf) ([london.gov.uk](https://www.london.gov.uk))

²⁰ OPDC (2024). Old Oak West Supplementary Planning Document. Available at: [Old Oak West Supplementary Planning Document \(SPD\) | London City Hall](https://www.opdc.org.uk/media/1000/old_oak_west_supplementary_planning_document_spd_london_city_hall.pdf)

neighbourhood designs, improving connectivity, and potentially delivering more housing and job spaces than previously planned. The SPD is structured by the following themes principles:

- **Good growth:** focus on delivering socially, economically inclusive and environmentally sustainable growth contributing to Social Value;
- **Transport:** to deliver a safe, inclusive, accessible and efficient movement network comprising a diverse range of streets and walking/cycling routes to support sustainable public transport, active travel and sustainable freight transport;
- **Environment and utilities:** deliver a network of resilient, high quality and inclusive green streets and varied multi-functional green spaces that support nature recovery, access to nature, high levels of urban greening can adapt to climate change to benefit wildlife and residents and act as community focal points;
- **Housing:** deliver a variety of high-quality housing tenures, typologies, sizes and specialisms to meet the diverse range of housing needs and create sustainable lifetime inclusive neighbourhoods;
- **Employment:** delivery of new employment spaces in terms of size, typologies and costs across Old Oak to establish it as a new commercial destination; and
- **Town centre and community uses:** deliver a new major town centre for Old Oak and Park Royal serving existing and new residents, workers and visitors; and
- **Design:** building attractive, healthier, more inclusive, sustainable homes and neighbourhoods, which are vibrant, safe, comfortable, and resilient to climate change.

A key element of the SPD is its vision for coordinated and comprehensive development. This includes spatial guidance specific to Old Oak West, supporting the creation of publicly accessible open spaces and a major town centre that caters to local character and infrastructure needs. The SPD should be read alongside wider SPD's, including the draft Public Realm and Green Infrastructure (PRGI) SPD²¹ that sets out the street hierarchy. The planning document is also designed to align with multiple planning documents, including the Mayor's London Plan and local neighbourhood plans, ensuring consistency in development standards and objectives.

The SPD emphasises the importance of a mixed-use development approach to enhance employment opportunities and economic growth. It outlines principles and ambitions for delivering diverse employment spaces that cater to various sectors, leveraging excellent transport links to attract businesses and foster a vibrant commercial environment. Case studies such as Elephant Park and POP Brixton are referenced to illustrate successful models of mixed-use development that support local businesses and community interaction.

In terms of housing, the SPD advocates for a range of housing types and affordability levels to meet local and strategic needs, supported by high-quality social infrastructure. The focus on social value and inclusive economic growth is a recurring theme, aiming to provide training and employment opportunities for local residents and ensure that the benefits of development are widely shared.

The SPD also sets out the 'Place and Cluster visions' for the six places already defined in the Local Plan that are either fully or partially located within Old Oak West. This includes Willesden Junction, Old Oak Lane and Old Oak Common Lane, Channel Gate, Old Oak South, North Acton and Acton Wells.

3.4.3 Old Oak West Equity, Diversity and Inclusion (EDI) Statement 2023²²

OPDC's EDI Statement was produced alongside the SPD and provides a summary of how the SPD supports equity, diversity and inclusion. The Statement highlights that OPDC recognises the important role it has in supporting EDI, and sets out their vision "to be an organisation that identifies, prioritises, enables and champions equitable opportunities for everyone – both staff and our communities –

²¹ OPDC (2024). Draft Public Realm and Green Infrastructure SPD. Available at: [Draft Public Realm and Green Infrastructure SPD | OPDC have your say](#)

²² OPDC (2023) Old Oak West Supplementary Planning Document Equity, Diversity and Inclusion Statement. Available at: [Old Oak West Supplementary Planning Document \(SPD\) | London City Hall](#)

regardless of background, race, age, gender identity, gender expression, sexual orientation or ability and to ensure that the area's regeneration is accessible and inclusive which helps to create a more level playing field."

A key objective underpinning this vision is planning for a welcoming, accessible, and inclusive place. The Statement outlines OPDC's recognition that the built environment has a strong influence on everyday lives, and the way the built environment is shaped can affect how people experience the world.

The OPDC area is outlined as one of the most richly diverse areas in the UK, home to many different communities, ethnicities, identities and cultures, but also that areas in and around OPDC are some of the most deprived in the country. OPDC aspires to deliver high quality regeneration in the area by embedding diverse and inclusive experiences, opinions and voices into everything they do.

The EDI Statement provides a summary of how the SPD embeds content to support EDI. For example, in relation to spatial vision, the SPD focuses on sustainability and inclusion that recognises local identities and cultures to shape lifetime neighbourhoods to deliver benefits for existing and future communities. In relation to housing, the SPD provides guidance to deliver a variety of high-quality housing tenures, types, sizes and specialist housing, and to deliver at least 25% family sized homes.

3.4.4 Ealing's Draft Local Plan 2024 (Regulation 22)²³

Following a period of public consultation, Ealing Council have submitted a Draft Local Plan in November 2024 for an independent Inspector to hold an examination into the soundness of the Plan and associated Impact Assessment and evidence (known as a Regulation 22 submission).

The Draft Local Plan document provides a comprehensive guide to the future development and growth of the borough intended to supersede the Local Plan 2012-2026. To deliver on the strategic objectives (tackling the climate crisis, fighting inequality, and creating good jobs and growth) outlined in the Local Plan 2012-2026, the Draft Local Plan outlines a series of nine priorities, including:

- **Genuinely affordable homes:** The plan includes a significant increase in affordable and council housing, empowering tenants and ensuring community ownership. Addressing the severe housing shortage, the plan aims to enhance social diversity and prevent economic polarisation, guided by the Ealing Race Equality Commission's recommendations.
- **An inclusive economy:** Promoting economic development is a core focus. The plan supports the creation of new job opportunities and the development of employment spaces. There is a particular emphasis on making Ealing a hub for creativity and industry, building on its rich heritage. The plan includes strategies to foster collaboration between local businesses and residents to stimulate job growth and economic vitality.
- **Climate action:** Ealing's Local Plan includes robust measures to promote sustainability and environmental stewardship. This includes initiatives to reduce carbon emissions, improve air quality, and encourage active travel (e.g., walking and cycling). The plan aims to make Ealing a greener borough by protecting green spaces and promoting environmentally friendly practices in new developments.
- **Thriving communities:** Ealing aims to strengthen communities by empowering volunteers, fostering community activism, and enhancing civic engagement. The borough will improve public transport connectivity and promote walking and cycling. The Local Plan integrates health considerations, emphasizing the importance of planning in reducing health inequalities and fostering community cohesion and safety.
- **Infrastructure and Services:** The Local Plan outlines the need for improved infrastructure to support growth. This includes enhancements to transportation, healthcare, education, and other essential services. The council aims to ensure that the necessary infrastructure is in place to support the expected population growth and that developments are sustainable and beneficial for all residents.

²³Ealing Council (2024) Ealing's Local Plan Final Proposals (Regulation 19). Available at: [\(Public Pack\)Agenda Document for Ealing's Draft Local Plan \(Regulation 19 Consultation Documents\), 28/02/2024 00:00 \(moderngov.co.uk\)](#)

3.4.5 Ealing Council Equality Objectives 2020 – 2024²⁴

Ealing Council's Equality Objectives are supported by the actions and strategic objectives outlined in the Council Plan 2022 – 2026.²⁵ The Council's Equality Objectives are as follows:

- Access to our information, services and facilities is fair and equitable for everyone;
- High levels of community cohesion are maintained;
- Gaps in outcomes for citizens are narrowed;
- A positive, diverse and inclusive workforce is ensured and promoted;
- A robust accurate evidence base of equalities information relating to the community is available and up to date;
- Equality related evidence is embedded into the decision-making process and forms an integral part of the evidence base for strategy and project development and delivery.

The Ealing Council Plan 2022-2026 outlines a comprehensive strategy focused on three strategic objectives: creating good jobs, tackling the climate crisis, and fighting inequality. The plan emphasises inclusive economic growth by aiming to create quality jobs and build genuinely affordable homes. Ealing aims to address the climate crisis by maintaining high environmental standards, enhancing green spaces, and promoting sustainable practices. The fight against inequality involves tackling issues such as race inequality, reducing crime, and ensuring the safety and well-being of all residents.

The plan sets specific priorities to achieve these objectives. To tackle inequality and crime, initiatives include significant investment in combating antisocial behaviour and supporting vulnerable populations. For climate action, the council plans to create new parks, promote active travel, and expand the school streets program. Health and well-being initiatives focus on paying care workers the London Living Wage, providing supported accommodation, and addressing health inequalities exacerbated by COVID-19.

The council is committed to ensuring a fairer start for children and young people through investments in education and youth services. Economic initiatives aim to secure thousands of new jobs and apprenticeships, as well as provide training and community hubs. Ealing's strategy also includes fostering an inclusive economy by ensuring fair salaries and expanding support for those unable to pay council tax. Ealing Council has also declared that experience of care amongst young people will be made a 'protected characteristic' in the Borough.²⁶

Housing initiatives include ending the need for temporary accommodation for families facing eviction, significant investments in new housing, and the delivery of thousands of genuinely affordable homes. Good growth is ensured by integrating good design and heritage into urban development and fostering community-led regeneration.

The plan also focuses on building thriving communities through initiatives that encourage civic engagement, support for arts and culture, and the establishment of town forums to prioritize local needs. Organizational priorities highlight the importance of efficient service delivery, transparency, and collaboration with community partners.

Ealing Council set up a Race Equality Commission in 2021 composed of 12 independent commissioners from diverse backgrounds and broadly reflecting diversity in Ealing. The purpose of this Commission is to listen to the population of Ealing and develop proposals that aim to address inequality on wellbeing and life chances.

²⁴ Ealing Council (2020) Equalities objectives. Available at: [Equalities objectives | Public sector equality duty | Ealing Council](#)

²⁵ Ealing Council (2022) Ealing Council Plan 2022 – 2026. Available at: [Council Plan 2022 \(ealing.gov.uk\)](#)

²⁶ Around Ealing (2023). Young people in care to receive protected characteristic status. Available at: [Young people in care to receive protected characteristic status - Around Ealing](#)

3.4.6 Hammersmith & Fulham Local Plan 2018²⁷

The Hammersmith & Fulham Local Plan serves as the primary framework for guiding development in the borough through to 2035. It sets out a vision and strategic objectives to manage and promote sustainable development, addressing housing, economic growth, environmental sustainability, and community well-being. Key components of the Plan include:

- **Meeting housing needs and aspirations:** Addressing the housing crisis is a critical aspect of the plan. It emphasizes the delivery of affordable housing, setting a borough-wide target of 50% affordable housing on new developments. The plan also encourages the efficient use of land and supports innovative housing solutions to meet diverse needs, including family-sized homes and specialist housing for the elderly and disabled.
- **Local economy and employment:** The plan promotes mixed-use developments that integrate commercial, residential, and leisure uses. There is a strong emphasis on supporting small and medium enterprises (SMEs) and safeguarding existing employment spaces to create a balanced and resilient economy.
- **Environmental Sustainability:** The plan promotes sustainable design and construction practices, encourages the use of renewable energy, and supports green infrastructure projects. Specific policies aim to reduce carbon emissions, improve air quality, and manage flood risks effectively.
- **Community facilities, leisure and recreation:** The Local Plan prioritizes the creation of healthy, inclusive communities. It supports the provision of high-quality healthcare, education, and community facilities. Policies aim to enhance public open spaces, improve recreational facilities, and promote active lifestyles. The plan also addresses social inequalities by promoting equitable access to services and opportunities.
- **Transport and accessibility:** The plan supports the enhancement of public transport services, development of pedestrian and cycling networks, and measures to reduce traffic congestion and pollution. It also emphasizes the importance of integrating transport planning with land use to create accessible and connected neighbourhoods.

3.4.7 Hammersmith & Fulham Equalities Plan 2021 - 2025²⁸

The Hammersmith & Fulham Equalities Plan 2021-2025 sets out the council's commitment to creating an inclusive environment where all residents feel valued and have equal access to opportunities. The plan was developed through a comprehensive consultation process with residents and staff, resulting in five key priorities:

- Ensuring everyone feels valued and has a sense of belonging;
- Removing barriers to inclusion;
- Addressing the disproportionate impact on young people;
- Improving opportunities for all; and
- Becoming an employer of choice that fosters greater inclusion.

The plan outlines several strategic actions to promote inclusion and equality across various sectors, such as education, employment, and community services. For example, initiatives include targeted support for young people at risk of exploitation or gang involvement, enhancing access to services for individuals with disabilities, and promoting diversity within the council's workforce. The council also aims to engage with the local community through various forums and feedback mechanisms to ensure that its initiatives are responsive to the needs and concerns of all residents.

²⁷ Hammersmith & Fulham Council (2018) Hammersmith & Fulham Local Plan 2018. Available at: [local_plan_2018_web_version.pdf \(lbhf.gov.uk\)](#)

²⁸ Hammersmith & Fulham Council (2021) Our Equalities Plan means business 2021 – 2025. Available at: [Equalities Plan 2021-25 \(lbhf.gov.uk\)](#)

In addition to these priorities, the plan includes measures to track the impact of its initiatives and ensure accountability. Regular reviews and updates will be conducted to assess progress and make necessary adjustments. The council's overarching vision is to make Hammersmith & Fulham the most inclusive borough in the country, where every resident has the opportunity to thrive and contribute to the community.

3.4.8 Brent Local Plan 2019-2041²⁹

The Brent Local Plan aims to guide development in Brent up to 2041. It outlines the council's vision and strategic objectives to manage growth while addressing housing, economic development, and environmental sustainability. The plan is framed around several key themes, including:

- **Housing:** The plan aims to meet the borough's housing needs by delivering approximately 27,482 new homes by 2041. This includes affordable housing, ensuring a mix of tenures and sizes to accommodate various needs. Policies are in place to promote the efficient use of land, such as increasing density in suitable areas and redeveloping underused sites.
- **Economy & town centres:** Brent's economic strategy focuses on enhancing its town centres and industrial areas. The plan supports the creation of new jobs, particularly in growth sectors such as technology, media, and creative industries. It also aims to maintain a supply of employment land and improve local skills through partnerships with educational institutions.
- **Sustainable infrastructure:** The plan emphasises sustainability, aiming to reduce carbon emissions and promote green infrastructure. Policies include enhancing public transport, supporting active travel (walking and cycling), and improving energy efficiency in new developments. The plan also addresses flood risk management and the protection of green spaces and biodiversity.
- **Social infrastructure:** Ensuring adequate infrastructure to support growth is a priority. This includes investments in healthcare, education, and community facilities. The plan supports the creation of vibrant, inclusive communities with accessible amenities and public spaces.
- **Heritage and culture:** Promotes high-quality design that respects the borough's diverse character and heritage. It includes guidelines to ensure new developments enhance local distinctiveness and contribute positively to the public realm. Conservation of historic assets and their integration into new developments is also a key focus.
- **Transport:** The plan supports improvements to public transport, the development of cycling and walking routes, and measures to reduce car dependency whilst improving connectivity within the borough and to the wider London area. This includes collaborating with Transport for London (TfL) and other stakeholders to improve transport infrastructure.

3.4.9 Brent's Equality, Diversity and Inclusion Strategy 2024 - 2028³⁰

Brent's Equity, Diversity, and Inclusion (EDI) Strategy for 2024-2028 sets out Brent Council's commitment to fostering a fair and inclusive borough. The strategy is driven by a vision of creating a community where diversity is celebrated, and all residents have equal opportunities to thrive. It outlines the council's approach to addressing systemic inequalities and promoting social cohesion through targeted actions. The strategy includes specific objectives such as improving workforce diversity, ensuring inclusive service provision, and enhancing community engagement.

A key component of the strategy is the focus on anti-racism. The council commits to actively challenging racism and discrimination in all its forms, both within the organization and across the community.

The strategy also addresses the importance of data and evidence in driving EDI initiatives. The council plans to use data to identify gaps and monitor progress, ensuring that actions are based on robust evidence. Community engagement is another crucial aspect, with the strategy outlining plans to involve residents and stakeholders in the development and implementation of EDI initiatives. This

²⁹ Brent Council (2022) Brent Local Plan 2019-2041. Available at: [Brent Local Plan \(adopted 2022\) | Brent Council](#)

³⁰ Brent Council (2024) Equity, Diversity and Inclusion Strategy 2024 – 2028. Available at: [brent-equity-diversity-and-inclusion-strategy-2024-28-digital-version-v2.pdf](#)

participatory approach aims to ensure that the voices of marginalised and underrepresented groups are heard and considered in decision-making processes.

Furthermore, the strategy recognises the impact of socio-economic inequalities and aims to address these through targeted support and interventions. By focusing on areas such as employment, education, health, and housing, the council seeks to create a more equitable environment where all residents can achieve their potential.

3.5 Wider Local Policy (i.e. housing, jobs and skills)

The local policies summarised in **Section 3.4** are not exhaustive. The surrounding Boroughs of Ealing, Hammersmith and Fulham and Brent have wider local policies relevant to this EqlA, including:

Ealing Borough

- **Great Homes, Better Lives: Our Housing Strategy for Ealing 2024-2029 (Draft)**³¹: the strategy aims to provide genuinely affordable, high-quality homes, improve health and wellbeing, and support diverse housing needs across Ealing. The Council commits to delivering 4,000 new genuinely affordable homes.
- **Ealing's Jobs and Skills Strategy 2024-2029**³²: the strategy aim to create a dynamic and inclusive economy by focusing on high-growth sectors and ensuring a suitably skilled local workforce. The Council seek to address challenges such as cost of living, housing and the impact of COVID-19.
- **Ealing's Strategic Ask**: Ealing Council is also considering a Strategic Ask for regeneration, investment and jobs at Old Oak Park Royal as part of an ongoing engagement process with OPDC. This Strategic Ask aims to support a partnership between Ealing Council and OPDC to deliver the best outcomes for Ealing residents and businesses. OPDC and Ealing Council are undertaking early stage discussions of this Strategic Ask and future regeneration in Old Oak should acknowledge the objectives and deliverables within where appropriate.

London Borough of Hammersmith and Fulham

- **London Borough of Hammersmith and Fulham Housing Strategy 2021-2026**³³: the strategy aims to provide safe, affordable, and sustainable housing that enhances residents' health, wellbeing and access to opportunities. The Council commits to building at least 1,500 genuinely affordable homes, including larger homes for families, involving residents in the decision-making process.

Borough of Brent

- **Brent Council Workforce Strategy 2023-2025**³⁴: the strategy identified key priorities to support and develop a diverse workforce, including: workforce planning, workforce insight and experience, workforce growth and development and ways of working.

3.6 Summary of key priorities

Table 3-1 below presents a summary of OPDC's and the three boroughs of Brent, Ealing, and Hammersmith and Fulham equality priorities and considerations in relation to the key regeneration and equality themes presented under **Section 4.3**.

³¹ Ealing (2024). Great homes, better lives: Our housing strategy for Ealing. Consultation Draft April 2024. Available at: [Housing Strategy for Ealing's Residents](#)

³² Ealing (2024). Ealing's Jobs and Skills Strategy 2024-2029. Available at: [Ealing's Jobs and Skills Strategy](#)

³³ Hammersmith and Fulham (2021). Housing strategy 2021 to 2026. Available at: [Housing strategy 2021 to 2026 | London Borough of Hammersmith & Fulham](#)

³⁴ [Decision - Workforce Strategy](#)

Table 3-1: Equality priorities

Themes	Priorities			
	Brent	Ealing	Hammersmith & Fulham	OPDC
Housing	<ul style="list-style-type: none"> • Deliver housing and create mixed, inclusive communities with at least 25% of new homes being family-sized (3 bedrooms or more). • The council targets 50% of new homes to be affordable. • To meet housing needs up to 2041, approve developments in Growth Areas and plan for future needs. • Address gypsy and traveller needs by retaining and expanding existing sites. 	<ul style="list-style-type: none"> • Meet the goal of 21,570 new homes from 2019-20 to 2028-29. • Create diverse, inclusive communities with a variety of housing options. • Focus on increasing affordable homes, especially social rent. • Support local housing projects and Community Land Trusts with resident involvement. • Address housing access issues that limit population growth and cause the outflow of working-age residents. 	<ul style="list-style-type: none"> • Aim for 50% of new homes to be affordable, of which 60% should be for social rent and 40% for intermediate rent. • Reduce high turnover in build-to-rent schemes which affect community cohesion. • Convert smaller terraced houses into family homes, trying to avoid areas near busy roads. 	<ul style="list-style-type: none"> • Aim for 50% of new homes within the OPDC area to be affordable, of which 60% should be for social rent or London Affordable Rent. • Aim for over 25% family housing, prioritising ground or first floor with garden access, close to parks and social infrastructure. • For higher-level family housing, ensure convenient access to secure private or communal open spaces suitable for children. • Include co-living, shared housing, and student accommodation. • Safeguard the existing Bashley Road Gypsy and Travellers Site and work positively with London Borough of Ealing to enhance the site where required.
Employment, skills, and training	<ul style="list-style-type: none"> • Ensure economic growth and jobs are accessible to everyone. • Large developments (5,000 sqm or more, or 50+ homes) must include an Employment, Apprenticeship, and Training Plan. • Local Employment Sites are crucial for providing diverse job premises. 	<ul style="list-style-type: none"> • Provide affordable workspaces that support social and economic goals, helping small and medium businesses start up. • In North Acton, create a construction skills centre to match local job opportunities with construction activity. 	<ul style="list-style-type: none"> • Support new and existing employment uses and their improvement. • Ensure land and buildings remain available for employment or local services. • Support local training and apprenticeships, particularly in major developments. 	<ul style="list-style-type: none"> • Create jobs, offer local training, and build an inclusive economy. • Break down barriers to under-represented groups in the labour market • Support minority-led businesses and SMEs to thrive • Develop small, affordable, and shared workspaces in Old Oak to support local businesses.

Themes	Priorities			
	Brent	Ealing	Hammersmith & Fulham	OPDC
			<ul style="list-style-type: none"> Encourage local businesses to adopt the London Living Wage. 	<ul style="list-style-type: none"> Drive the highest standards of fair employment, D&I and pay (LLW minimum)
Neighbourhood and community	<ul style="list-style-type: none"> Protect social infrastructure unless it is proven unnecessary, replaced with better facilities, or part of an agreed redevelopment plan. New or improved social infrastructure should be easily accessible by public transport, walking, or cycling. Resist the loss of pubs as they are important community assets. Avoid clustering by ensuring adult gaming centres, pawnbrokers, betting shops, and takeaways will not be close to each other. 	<ul style="list-style-type: none"> Enhance and adapt social infrastructure to better serve Ealing's growing population. Ensure new development includes necessary social infrastructure and does not harm existing facilities. Protect and improve community facilities to strengthen communities and boost social integration and pride. 	<ul style="list-style-type: none"> Community uses should meet local needs, minimise environmental impact, and be accessible to all. Protect and enhance parks, open spaces, and biodiversity. Improve and expand school options. Enhance leisure, sports, arts, and cultural facilities, protect existing ones, and support new developments, including major facilities in White City and riverside areas. 	<ul style="list-style-type: none"> Ensure coordinated development of future town centre uses, including cultural and temporary uses to create a Cultural Quarter. Provide day and night activities in Old Oak and North Acton town centres. Community hubs that support diverse local needs, including youth, elderly, and faith groups. Along Grand Union Canal, create activities for enjoyment and safety day and night. Deliver social infrastructure.
Health and wellbeing	<ul style="list-style-type: none"> Protect and retain social infrastructure and associated health services. Address poor air quality which currently has a negative effect on the health of Brent's residents. 	<ul style="list-style-type: none"> Provide more physical, social, and green infrastructure like health facilities, schools, sports amenities, transport, utilities, and community spaces. Mitigate housing issues that are limiting population growth and causing the outflow of working-age residents. 	<ul style="list-style-type: none"> Improve borough-wide healthcare. Integrate health and social care, tackle childhood obesity, improve access to Sheltered Housing, enhance mental health services, provide better sexual health services for at-risk communities. 	<ul style="list-style-type: none"> Create a zero-carbon urban quarter in Old Oak West. Design green streets to be fully accessible. Develop green streets connecting public spaces that promote health and wellbeing. High quality public spaces, with features like social spaces, local food growing, sports areas.

Themes	Priorities			
	Brent	Ealing	Hammersmith & Fulham	OPDC
Transport infrastructure and connectivity	<ul style="list-style-type: none"> • Prioritise active and sustainable travel over private motor vehicles. • Support and design active travel schemes to meet the healthy streets principles and provide access for all. • Increase coverage of electric vehicle charging points. • Prioritise car free development. 	<ul style="list-style-type: none"> • Collaborate with OPDC to improve connections between North Acton and the rest of Acton. • Enhance pedestrian and cyclist routes across the A40. • Prioritise better pedestrian crossings across major roads at key points. 	<ul style="list-style-type: none"> • Improve transport, accessibility, and air quality by enhancing cycling, walking, and public transport. • Provide accessible off-street parking for Blue Badge holders. • Transport Assessments are required with planning applications for developments with significant transport impact. 	<ul style="list-style-type: none"> • Create a safe, inclusive, and efficient active travel network. • Use Legible London and artwork-based signs for wayfinding. • Design a high-quality cycling network with dedicated routes. • New and improved bus routes. • Make Old Oak Common Station accessible 24-hour routes integrated into the broader network.

4. Evidence review

4.1 Introduction

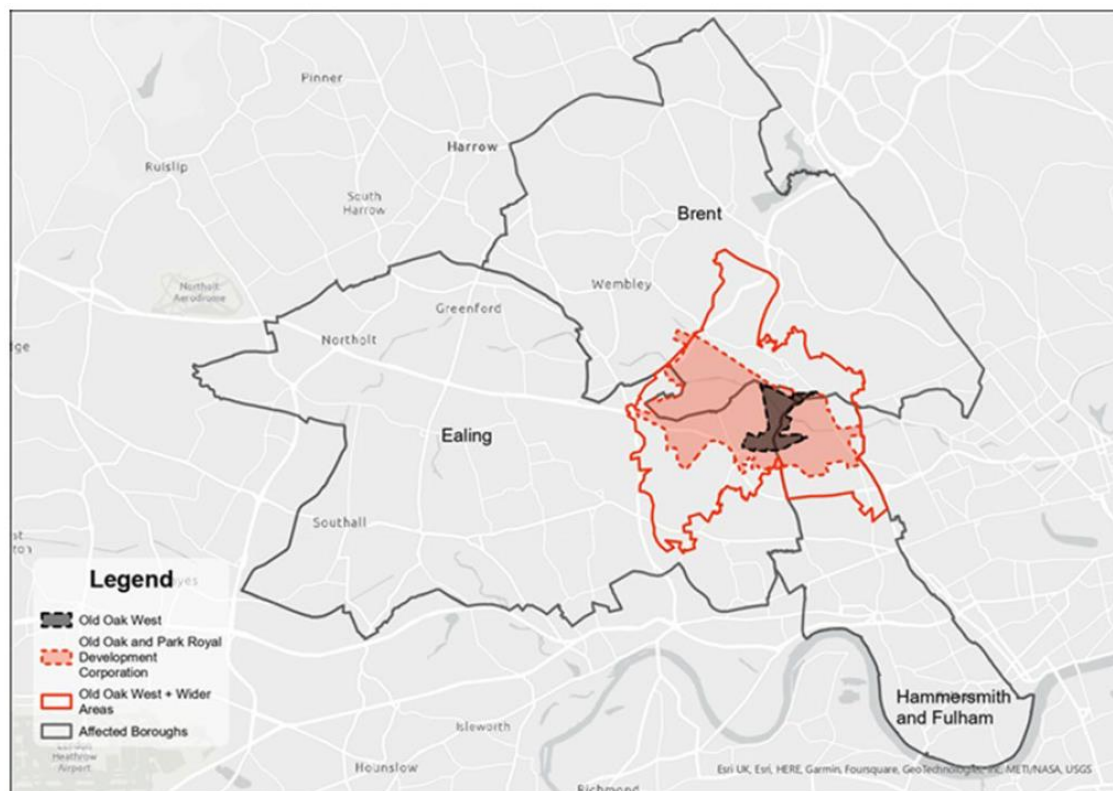
This section provides an overview of the baseline and evidence with regards to equalities. This includes key population statistics, drawing on relevant data from the EqlA baseline completed by Arup in February 2023 (see **Appendix C**), and OPDC's Old Oak West Supplementary Planning Document. The evidence review also presents key evidence and issues informed by the review of wider baselines and documents, notably the Old Oak and Park Royal Socio-economic baseline and Old Oak Community Engagement Summary Report, and other relevant sources deemed suitable to support the evidence provided in relation to key themes and issues.

4.2 Equalities baseline

For consistency, the same geographical areas have been used in this evidence review as used in the EqlA baseline completed by Arup. These are as follows:

- Old Oak West (Old Oak): This is the Old Oak development and regeneration area.
- Old Oak and Park Royal Development Corporation (OPDC) area: This comprises the areas within the OPDC boundary as set out in the OPDC Local Plan.
- Old Oak + wider areas: This comprises Old Oak plus the neighbouring areas of Harlesden and Willesden Junction, Park Royal, Old Oak, and Scrubs Lane and North Acton.
- The geographical boundaries of Brent, Ealing, and Hammersmith & Fulham Boroughs (referred to collectively as the three boroughs) that intersect with the Old Oak regeneration area.
- London and England have also been used for regional and national comparison.

Figure 4-1: Geographical area boundaries



Source: Arup Old Oak West EqlA Baseline (2023)

In summary, the key issues relating to equalities are:

- The population growth rate of Old Oak (14.6%) is significant- and greater than that of London (7.3%) and England (6.4%) between 2011 and 2021.
- In Ealing by 2041, the largest population growth will be seen in the 75–79-year-old age group which is expected to grow by 41%.³⁵ In Brent, the number of residents aged over 65 could increase by 78% between 2020 and 2041.³⁶ In Hammersmith & Fulham, the population aged over 65 is predicted to increase by 36% by 2033.³⁷
- Old Oak has a notably higher proportion of young people aged 16-24 (17.5%) than the surrounding geographies.
- Compared to surrounding areas, Old Oak has a lower proportion of residents reporting they have a disability that limits their day-to-day activities (12.6%).
- Christianity is the most widely observed religion across all geographies. Islam is the second most prevalent religion with 17.7% of Old Oak's residents being Muslim.
- Approximately 60% of residents in Old Oak and OPDC area have a minority ethnic background, compared to London (46.2%) and England (19.0%). In Old Oak, Black, Black British, Black Welsh, Caribbean or African residents make up the largest minority group at 23.1%.
- While Gypsy or Irish Travellers represent only 0.3% of the Old Oak population, Bashley Road Travellers Site containing 24 pitches is located just outside the Old Oak boundary.³⁸
- There is a higher birth rate within the three boroughs compared to London and England. Brent had the highest live births per 1,000 residents, at 14.1.
- Old Oak and the OPDC area have slightly higher proportions of residents identifying as a different sex than the sex registered at birth (1.5% and 1.3% respectively) in comparison to London and National figures.
- Old Oak has a higher proportion of gay, lesbian, bisexual, and all other sexual orientations (5%) compared to London (4.2%) and national rates (3.1%).
- Old Oak has a higher proportion of residents who have never been married or in a registered civil partnership (59.5%) compared with rates for local boroughs, London and England

4.3 Key evidence and issues: Regeneration and Equality

This section provides information on key evidence and issues relevant to regeneration and equality groups. It is informed by the Arup equalities baseline, planning documents from OPDC, as well as wider datasets and literature pertinent to equalities in the context of regeneration. Evidence is focused on the Old Oak area and three boroughs where possible. However, due to availability of information London-wide data is used as a proxy in some instances. Comparison to national information has been used where appropriate to illustrate certain points.

Throughout the key evidence and issues section, varying geographical levels are considered dependent on publicly available data. These include:

³⁵ Ealing Council (2021) Ealing JSNA 2021: Population Characteristics. Available at: [JSNA 2021 Population Characteristics - May 2022 \(ealing.gov.uk\)](https://ealing.gov.uk/jsna-2021-population-characteristics)

³⁶ Brent Council (2021) Borough Plan 2023 – 27 Evidence Pack. Available at: [9b. Appendix B - 2023-27 Borough Plan Evidence Pack.pdf \(brent.gov.uk\)](https://brent.gov.uk/borough-plan-2023-27-evidence-pack)

³⁷ Hammersmith & Fulham Council (2023) Older People's Needs Assessment 2023. Available at: [Older people's needs assessment 2023 H&F \(lbhf.gov.uk\)](https://lbhf.gov.uk/older-peoples-needs-assessment-2023)

³⁸ Ealing Council (2023) Additional site allocations for gypsy and traveller pitch provision: Summary report. Available at: [Additional site allocations for gypsy and traveller pitch provision: Summary report | Additional site allocations for gypsy and traveller pitch provision: Summary report | Ealing Council](https://ealing.gov.uk/additional-site-allocations-for-gypsy-and-traveller-pitch-provision-summary-report)

- East Acton Ward: Ward layout before 2022 encompassing the Old Oak area to the west of Old Oak Common Lane up to Willesden Junction and beyond North Acton station. Ealing has had new ward layouts since 2022.
- North Acton Middle-Super Output Area (MSOA)³⁹: MSOA layout used in the 2021 Census encompassing the Old Oak area to the west of Old Oak Common Lane up to Willesden Junction and beyond North Acton station
- Brent, Ealing and Hammersmith and Fulham Boroughs: the geographical boundaries of the three boroughs that intersect with the Old Oak regeneration area.
- London has been used to provide regional level statistics and comparison points.

4.3.1 Housing

Table 4-1 provides a breakdown of housing tenures within each of the three boroughs as well as housing waiting list figures. As is the case with other London boroughs, the three boroughs have a shortage of affordable social housing. The following sections explore the key evidence and issues for these geographical areas, alongside Old Oak.

Table 4-1: Existing housing tenure split and housing waiting list in the three boroughs

	Ealing ⁴⁰	Brent ⁴¹	Hammersmith and Fulham ⁴²
Owned	46.2%	38.0%	32.1%
Shared Ownership	2.0%	2.0%	1.5%
Private rented sector housing	34.0%	36.0%	36.4%
Social rented housing	17.5%	24.0%	29.8%
Total number of households on housing waiting lists	>7,500 applications ⁴³	>32,000 people	3,000 people ⁴⁴

Borough of Ealing

As **Table 4-1** highlights, there are currently over 7,500 applications on the council housing register in Ealing with 200-250 new applications being received each month. A demographic breakdown of residents on the housing waiting list was not available for this EqIA.

Affordability of private sector housing is a major issue in Ealing and is an issue most acute for families needing larger (over 3 bedroom) properties.⁴⁵ Ealing's Local Housing Needs Assessment identifies there is a target of 6,120 new dwellings in the area covered by OPDC in Ealing, and that across the borough there is an existing net affordable housing need of 7,365 households, as well as a future (2021 - 2041) affordable housing need of 5,062 households.⁴⁶

Certain protected characteristic groups in Ealing are disproportionately impacted by the demand for housing. Ealing's older population is forecasted to grow significantly in line with trends across London

³⁹ ONS (2021) Statistical geographies. "Middle layer Super Output Areas (MSOAs) are made up of groups of Lower layer Super Output Areas (LSOAs), usually four or five. They comprise between 2,000 and 6,000 households and have a usually resident population between 5,000 and 15,000 persons. MSOAs fit within local authorities." Available at: [Statistical geographies - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/statistical-geographies)

⁴⁰ ONS (2021). Census 2021: TS054 Tenure. Available at: [Nomis - Official Census and Labour Market Statistics - Nomis - Official Census and Labour Market Statistics](https://nomis.co.uk/census/2021/tenure)

⁴¹ Information provided by Brent Council October 2024.

⁴² ONS (2021). Census 2021: TS054 Tenure. Available at: [Nomis - Official Census and Labour Market Statistics - Nomis - Official Census and Labour Market Statistics](https://nomis.co.uk/census/2021/tenure)

⁴³ Ealing Council (2024) Ealing's housing register. Available at: [Ealing's housing register | Applying for a council home](https://www.ealing.gov.uk/housing-register)

⁴⁴ Hammersmith & Fulham (2024) The housing register. Available at: [The housing register Borough of Hammersmith & Fulham](https://www.hammersmithfulham.gov.uk/housing-register)

⁴⁵ Ealing Council (2019) Private Sector Housing Strategy. Available at: [Ealing Private Sector Housing Strategy 2014-19](https://www.ealing.gov.uk/private-sector-housing-strategy)

⁴⁶ Opinion Research Services (2022) Ealing Local Housing Needs Assessment Update. Available at: [Ealing Local Housing Needs Assessment Update](https://www.ealing.gov.uk/local-housing-needs-assessment-update)

and therefore the demand for specialist units for older people will also grow. To meet this demand Ealing intends to follow the precedent set by other boroughs, and in line with targets established in the London Plan, deliver 200 specialist older persons units per year for Ealing's plan period 2021 to 2041. Older people can find it more difficult to rehouse due to reasons such as financial constraints and physical challenges posed by age and increased chance of experiencing a disability. Older people may also be more reluctant to move if they have lived in the same house for a long time and are a long-standing member of a particular community or area.

The number of young people aged 25-34 is also projected to grow by 4,200 between 2021 and 2041 in Ealing. However, the number of single person households aged 25-34 years is projected to fall by 1,340 over the same period. This decline in young adult single households, contrastingly to the growing population, is due to an increasing number of young adults not forming their own households but instead sharing properties with other young adults. This is due to pressures for social housing and rising private rents. This trend, coupled with a growing number of multi-generational households, is expected to increase the demand for larger homes in Ealing, even though the number of families with children is projected to grow at a low rate (by 500) between 2021 and 2041. In Ealing, non-white households are disproportionately represented in multi-generational living arrangements, where they are also more likely to face the intersecting issue of overcrowding.

Borough of Brent

In Brent there are over 32,000 people on the social housing waiting list with the council receiving 2,000 new housing applications every year. **Table 4-2** below shows the demographic breakdown of the waiting list by age, disability and ethnic group. This data reveals a disproportionate representation of those aged 30-45 years (44.0%) and ethnic minority groups, especially Black or Black British (31.6%). A more detailed breakdown provided by the Council revealed that the largest ethnic minority group is African comprising 16.4% of the waitlist, followed by Caribbean (12.4%).

Table 4-2: Demographic breakdown of social housing waitlist in the Borough of Brent⁴⁷

Protected characteristic group		Percentage of social housing waitlist
Age	16-29	11.0%
	30-45	44.0%
	46-59	31.0%
	60+	14.0%
Disability: those who confirmed 'I have a disability' on Locata application form		12.0%
Ethnic group	White	20.4%
	Asian, Asian British or Asian Welsh	15.3%
	Black, Black British, Black Welsh, Caribbean or African	31.6%
	Mixed or Multiple ethnic groups	4.0%
	Other ethnic group	6.0%
	Not stated	22.6%

Brent Council also provided the average waiting times for priority band A-C on the housing waiting list, summarised in **Table 4-3** below. Generally, larger properties such as 3-bed, 4-bed, and 5-bed homes have significantly longer waiting times, especially for lower priority bands (B and C), with waits extending up to 16 years. In contrast, smaller units like studio flats and 1-bed accommodations have shorter waiting periods, particularly for higher priority bands (A and B), ranging from 5 months to 13

⁴⁷ Information provided by Brent Council October 2024.

months. Sheltered accommodation shows a more moderate waiting time across all priority bands, with a maximum of 33 months for priority C.

Table 4-3: Average waiting times for social housing for priority bands A-C in Brent⁴⁸

Type/ Size	Priority band A: emergency need to move	Priority band B: urgent need to move	Priority band C: reasonable preference
Sheltered Accommodation	19 months	25 months	33 months
Studio flat	5 months	7 months	5 years
1-bed	11 months	13 months	3 years
2-bed	9-18 months	22-24 months	7-10 years
3-bed	16-19 months	3-4 years	12-16 years
4-bed	17 months	5 years	16 years
5-bed	19 months	3 years	16 years

Lack of housing, in particular affordable housing is also a significant issue in Brent. The Local Plan highlights the borough has a need for 48,000 additional homes between 2016 – 2041, of which 19,448 should be affordable. Of the affordable need, 85% is projected to be required in the form of social rent (council house type rents) and 10% for London Living Rent.

Changing demand for different house sizes and tenures will have disproportionate impacts on certain protected characteristic groups. Brent requires the majority, 53.8%, of new homes to be family size dwellings (3 bedrooms or more) yet the borough is expecting to see a drop in the number of couples with children between 2019 and 2041. The demand for family size dwellings, similarly to Ealing, is therefore expected to be driven by a growth in the number of young adults sharing households, as well as multi-generational houses. Currently, there are 1,400 specialist dwellings for older people in the borough (excluding nursing homes). Similarly to trends across London, there is expected to be significant growth in the number of older people in Brent between 2019 and 2041, and consequently an additional 4,400 specialist older people's houses are anticipated to be required.

London Borough of Hammersmith & Fulham

As **Table 4-1** highlights, Hammersmith & Fulham has a slightly different spread of housing tenures compared to Ealing and Brent in terms of having a greater existing proportion of social housing that is comparable to the share of private rented housing. However, there are still around 3,000 people waiting for housing in Hammersmith & Fulham. A demographic breakdown of residents on the housing waiting list was not available for this EqIA.

The waiting times for different housing types and priority bands vary significantly, as shown in **Table 4-4** below⁴⁹. For sheltered accommodation, the wait ranges from 12-14 months for those with an urgent need to move, to up to 26 months for those with a general housing need. Studio flats or 1-bed units have shorter waits, generally between 11-16 months across all priority bands. While the wait for 4-bed or larger homes is notably longer than other sizes, at 32-70 months for those qualifying for the Community Contribution priority scheme⁵⁰ and 50-70 months for general housing needs.

Further, Hammersmith and Fulham housing register waiting times data shows that only 6% of successful housing applicants are identified as people with an urgent need to move (band 1) and the largest proportion of applicant are people with housing need that have provided evidence of making a community contribution (band 2).⁵¹ While 45% as assigned the lowest priority need (band 3).

⁴⁸ Information provided by Brent Council October 2024.

⁴⁹ London Borough of Hammersmith and Fulham (no date). The Housing Register: Waiting times. Available at: <https://www.lbhf.gov.uk/housing/housing-register/waiting-times> (last checked 08/09/25)

⁵⁰ The Community Contribution priority scheme is a Hammersmith & Fulham Council policy which gives a qualifying applicant increased priority for housing. Criteria includes working households, volunteers, those in education or training, ex armed forces personnel, registered foster carers, adopters and special guardians. Disabled people and young people are subject to special conditions. https://www.lbhf.gov.uk/sites/default/files/section_attachments/hf_housing_allocation_scheme_2021.pdf

⁵¹ London Borough of Hammersmith and Fulham (no date). The Housing Register: Waiting times. Available at: <https://www.lbhf.gov.uk/housing/housing-register/waiting-times> (last checked 08/09/25)

Table 4-4: Average waiting times for social housing for priority bands 1-3 in LBHF⁵²

Type/ Size	Priority band 1: urgent need to move	Priority band 2: made community contribution	Priority band 3: housing need
Sheltered Accommodation	12-14 months	11-32 months	15-26 months
Studio flat or 1-bed	11-13 months	11-15 months	11-16 months
2-bed	12-16 months	18-44 months	38-50 months
3-bed	36-70 months	22-60 months	50-67 months
4-bed or more	N/A	32-70 months	50-70 months

Similar to the other boroughs, Hammersmith & Fulham has established targets to deliver more affordable housing, and housing that meets the needs of different protected characteristic groups; Hammersmith & Fulham's Housing Strategy 2021 - 2026⁵³ commits to building at least 1,500 genuinely affordable homes, prioritising larger flats and homes for families. The Local Plan's target for 2018 – 2035 is for 50% of all dwellings in the borough to be affordable, and of these 60% should be social rents.

Hammersmith & Fulham's population aged over 65 is expected to increase by 58% by 2035, and the population aged over 85 is expected to double. To support the growth in these age groups more wheelchair accessible and wheelchair adaptable housing across all tenures is needed, as currently a fifth of older people live in council owned 'general needs' accommodation with nearly half having no ground floor entrance and many having no lift access. The council also recognises the need to meet the needs of people who need additional care and support through special needs housing, such as extra care housing, housing for people with learning disabilities and nursing homes, sheltered housing and residential care homes with on-site home and medical care.

Old Oak regeneration area

The Arup Baseline highlights that although the average house price in Old Oak (£467,500) is lower than London (£533,531), the affordability ratio is higher (14.3 compared to 13.7). The affordability ratio is calculated as the amount of a household's income they could typically expect to spend on purchasing a home. Data from the Office for National Statistics on private housing rent at local authority level shows Hammersmith & Fulham had the highest average monthly rent as of June 2024 at £2,530 and Ealing the lowest at £1,825.⁵⁴

Housing poverty and protected characteristic groups

Some protected characteristic groups are likely to be disproportionately affected by housing-driven poverty. For example, 39% of Londoners from Black, Asian and Minority Ethnic (BAME) backgrounds live in relative poverty after housing costs (such as rent, mortgage payments, home insurance, council tax⁵⁵) compared to 21% of White Londoners.⁵⁶ Recent studies highlight that the effects of housing poverty are made worse by the issue of new developments in London failing to meet required affordable housing quotas.⁵⁷ This shortfall not only perpetuates housing poverty but also widens the gap in access to affordable housing, disproportionately affecting minority communities.

⁵² London Borough of Hammersmith and Fulham (no date). The Housing Register: Waiting times. Available at: [Waiting times | London Borough of Hammersmith & Fulham](#)

⁵³ Hammersmith & Fulham (2021) Housing strategy 2021 to 2026. Available at: [Housing strategy 2021 to 2026 | London Borough of Hammersmith & Fulham \(lbhf.gov.uk\)](#)

⁵⁴ ONS (2024) Price Index of Private Rents, UK: monthly price statistics. Available at: [Price Index of Private Rents, UK: monthly price statistics - Office for National Statistics \(ons.gov.uk\)](#)

⁵⁵ Trust for London (2023) Poverty before and after housing costs. Available at: [Poverty before and after housing costs](#)

⁵⁶ Mayor of London (2020) Homes for Londoners: Affordable Homes Programme 2021-2026. Available at: https://www.london.gov.uk/sites/default/files/homes_for_londoners_-_affordable_homes_programme_2021-2026_-_equality_impact_assessment.pdf

⁵⁷ Almeida, A (2021) Pushed to the Margins. A Quantitative Analysis of Gentrification in London in the 2010s. Available at: [london.gov.uk/sites/default/files/homes_for_londoners_-_affordable_homes_programme_2021-2026_-_equality_impact_assessment.pdf](https://www.london.gov.uk/sites/default/files/homes_for_londoners_-_affordable_homes_programme_2021-2026_-_equality_impact_assessment.pdf)

4.3.2 Employment, growth, skills and training

Old Oak experiences greater levels of deprivation than comparative geographies, in particular relating to employment and income. The Arup Baseline reveals that Old Oak has high levels of deprivation with over 80% of the Lower Super Output Areas (LSOAs)⁵⁸ in the area being in the top 10% most deprived nationally overall. The employment domain of the Indices of Deprivation (IoD) 2019⁵⁹ measures the working age population in an area which has been involuntarily excluded from the labour market. In Old Oak half of the LSOAs are within the 10% most deprived nationally in this domain. The income domain of the IoD measures deprivation relating to low income (including those out of work). In Old Oak, more than 60% of the LSOAs are within the most 10% most deprived nationally in this domain.

In relation to economic activity, Old Oak has a lower level of economically active residents (62%) compared to the three boroughs (66.1%) and London (66.2%). Old Oak also has significantly higher levels of unemployment (7.1%) compared to the three boroughs (4.9%), London (4.8%) and England (3.5%). The Socio-Economic Baseline Study for OPDC, informed by the 2011 Census, is useful in revealing intersectionality of certain protected characteristic groups and socio-economic issues.⁶⁰

Table 4-5 below provides an illustrative overview on economic activity and unemployment in the OPDC area compared to London in relation to certain age and ethnic groups.

Table 4-5: Socio-economic issues relating to age and ethnicity

Socio-economic theme	Comment
Economic activity rates by age	The rates of economic activity are lowest in the 45–54-year-old age group (7.7% lower than London) followed by the 35–44 age group (6.4% lower than London).
Economic activity rates by ethnicity	Economic activity is lowest in the OPDC area for the Black/African/Caribbean (58.8%) and Other ethnic groups (49.3%), compared to White, Mixed, or Asian ethnic groups (which range between 68.2% and 69.7%).
Unemployment rates by age	The greatest disparity in unemployment between the OPDC area and London is also in the 45–54 and 35–44 age groups (4.7% and 4.9% higher than London respectively), although the unemployment rate in the OPDC area is highest amongst the 16–24-year-olds (25.7%)
Unemployment rates by ethnicity	Unemployment is highest for the Black/African/Caribbean ethnic group in the OPDC area (22.2%), compared to London (17.7%).

4.3.3 Neighbourhood and Community

Community safety

The Socio-Economic Baseline Study highlights the OPDC Area had a significantly higher crime rate per 1000 people in 2014/15, at 120 compared to 80 across London. Crime rates have lowered in recent years, however analysis of Metropolitan Police and Census 2021 data highlights there is still a disparity between OPDC and London – in 2021 the OPDC area had a crime rate of 85 per 1,000 residents, compared to 75 in London.⁶¹ Further, the Old Oak West Community Engagement Summary Report supports these statistics, setting out people's perception of the local area. In

⁵⁸ ONS (2023). An Output Area (OA) is the smallest geographical unit used for publishing UK Census data. It's designed to provide detailed, local-level statistics while protecting individual privacy. An OA typically includes around 125 households or 300 residents, but can vary depending on urban density. Lower layer Super Output Areas (LSOAs) are made up of groups of OAs (usually four or five). They comprise between 400 and 1,200 households and have a usually resident population between 1,000 and 3,000 persons. Available at: [Area type definitions Census 2021 - Office for National Statistics](#)

⁵⁹ Ministry of Housing, Communities & Local Government (2018 to 2021) The English indices of deprivation 2019 provide statistics on relative deprivation in small areas in England. Available at: [English indices of deprivation 2019 - GOV.UK](#)

⁶⁰ Van Lohuizen, A (2016) Socio-economic baseline – Old Oak and Park Royal. Available at: [41. socio-economic baseline study 0.pdf \(london.gov.uk\)](#)

⁶¹ Metropolitan Police (2024) MPS LSOA Level Crime (Historical) 01/042010 to 31/01/2022. Available at: [Recorded Crime: Geographic Breakdown - London Datastore; and](#) ONS (2021) Census 2021: TS001 – Number of usual residents in households and communal establishments. OPDC LSOAs; London Region. Available at: [Dataset Selection - Query - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](#)

particular, when asked to describe their perception of the non-physical environment local residents used terms such as 'unsafe', 'hostile', and 'dangerous'.⁶²

Evidence also highlights that high crime rates in London disproportionately impact individuals from ethnic minority backgrounds, particularly people from Black communities. In the year ending March 2022, the rate of stop and searches for Black residents in London was 40.5 per 1000, compared to 14.1 for Asian residents, and 14.0 for White residents.⁶³ The rate of arrests between April 2021 and March 2022 was also higher for ethnic minorities in London, at 13.3 per 1000 compared to 9.6 per 1000 for people from White ethnic groups. These figures may hold particular relevance for Old Oak given the ethnically diverse nature of the local community and significant representation of people from Black ethnic groups. Furthermore, evidence highlights that young black people (aged 0-24) are significantly more likely to be victims of knife crime and homicide in London, and that living environment deprivation is a key predictor of which areas have the highest rates of victimisation.⁶⁴ Several of the LSOAs covering the Old Oak area, particularly in the north towards Willesden Junction and Harlesden, rank in the 10% most deprived in the living environment domain of the IoD.

Community resources and open spaces

Old Oak is currently home to a number of community facilities as follows:

- Nadi Park Royal community centre on Old Oak Common Lane provides facilities for wedding and charity functions as well as gym services. The site familiarisation visit and online searches have identified that it is likely Nadi Park Royal also acts as a social and religious hub for the local Muslim community;
- In Oaklands Rise, a new residential development, there is a community room and café available for hire; and
- The Collective, another new residential development, also offers space for community hire.

There are a limited number of publicly accessible open spaces in Old Oak, comprising:

- Midland Terrace play space, Victoria Gardens, Cerebos Gardens, canal-side spaces and the Old Oak Community Gardens. There are also some inaccessible green spaces adjacent to railways, which provide value as wildlife habitats and visual amenity.
- The Grand Union Canal is a Site of Importance for Nature Conservation of Metropolitan Importance.
- Wormwood Scrubs is the largest nearby open space and is designated as Metropolitan Open Land and a Metropolitan Park. Wormwood Scrubs is a 10 to 20 minute walk from the majority of Old Oak.

Lack of access to open space disproportionately impacts deprived areas, ethnic minority groups, and religious minority groups in London; in areas where more than 40% of residents are from black or minority ethnic backgrounds, there is significantly less green space compared to predominantly white areas, and the available spaces are often of poorer quality. This lack of quality green space contributes to higher levels of stress, poorer physical health, and a feeling of insecurity among these communities.⁶⁵

Further to these, the wider OPDC area and surrounding neighbourhoods of Ealing, Acton, Shepherd's Bush and Harlesden provide a range of community resources and services that local residents may rely on, particularly protected characteristic groups. These include, but are not limited to:

⁶² OPDC (2023) Old Oak West Community Engagement Summary Report. Available at: [Old Oak West Supplementary Planning Document \(SPD\) | London City Hall](#)

⁶³ UK Government (2023) Arrests – Ethnicity facts and figures. Available at: [Arrests - GOV.UK Ethnicity facts and figures \(ethnicity-facts-figures.service.gov.uk\)](#)

⁶⁴ Greater London Authority (2021) Understanding serious violence among young people in London. Available at: [a-public-health-approach-to-serious-youth-violence - London Datastore](#)

⁶⁵ Design Council (2010) Community green: using local spaces to tackle inequality and improve health. Available at: [community-green-full-report.pdf \(designcouncil.org.uk\)](#)

- Educational facilities: Melrose Nursery School, Maples Nursery School and Children's Centre and John Perryn Primary School located south of North Acton Underground Station; Phoenix Academy, Old Oak Community and Children's Centre and Imperial College London, Hammersmith Campus located south of Wormwood Scrubs Open Space; and Harlesden Primary, Newfield Primary School and The Stonebridge Schools located north of Willesden Junction.
- Healthcare services: Central Middlesex Hospital located north west of North Acton Underground Station and Hammersmith Hospital located south of Wormwood Scrubs Open Space.
- Leisure and shopping: Royale Leisure Park and local supermarkets located within the OPDC area and Westfield Shopping Centre located in Shepherd's Bush.

4.3.4 Health and wellbeing

The most recent health and wellbeing information highlights that there are varied health issues affecting residents in East Acton ward, summarised below and presented in comparison to the three boroughs in **Table 4-6**:

- Brent has the highest proportion of residents with a long-term limiting illness or disability.
- Brent also has the highest proportion, just over a quarter, of children in year-6 with obesity (including severe obesity).
- Smoking prevalence (regular and occasional) amongst 15-year-olds is highest in London, followed locally by East Acton and Ealing.
- Hammersmith & Fulham, and East Acton, have the highest standardised incidence ratios (SIR) of lung cancer.⁶⁶ They also both have the highest standardised mortality ratios (SMR)⁶⁷ for cancer deaths.
- Brent and Ealing contrastingly have the highest average mortality ratio for all causes of death excluding cancer (all causes, circulatory disease, coronary heart disease, stroke, respiratory disease).

Table 4-6: Health and wellbeing indicators in East Acton and the three boroughs⁶⁸

	Brent	Ealing	Hammersmith & Fulham	East Acton	London
Long-term limiting illness or disability	14.4%	14.1%	12.6%	12.9%	14.2%
Prevalence of year-6 obesity	26.1%	24.7%	20.5%	23.9%	24.8%
Smoking prevalence amongst 15-year-olds	4.2%	5.4%	4.6%	5.4%	6.2%
SIR of lung cancer ⁶⁹	80.6	82.0	125.3	113.4	96.9
SMR of cancer deaths ⁷⁰	81.5	86.3	94.5	104.6	95.6
Mortality ratio for other deaths ⁷¹	90.9	93.3	89.7	83.2	90.3

⁶⁶ Centre for Disease Control and Prevention (2022) 'Standardised incidence ratio is an estimate of the number of cancer cases in a given population compared to what might be expected based on a comparison with the cancer experience in a larger population'. Available at: [Standardized Incidence Ratio \(SIR\) \(cdc.gov\)](https://www.cdc.gov/std/sir/)

⁶⁷ INED (2024) 'The standardized mortality rate (SMR) is the ratio of the number of deaths observed in a population over a given period to the number that would be expected over the same period if the study population had the same age-specific rates as the standard population'. Available at: [Standardized mortality ratio - Ined - Institut national d'études démographiques](https://www.ined.fr/en/standardized-mortality-ratio-ined-institut-national-etudes-demographiques)

⁶⁸ Office for Health Improvement and Disparities (2021) Local Health. Available at: [Local Health - Office for Health Improvement and Disparities](https://www.localhealth.org.uk/)

⁶⁹ The term 'SIR' stands for Standardised Incidence Ratio and 'SMR' stands for Standardised Mortality Ratio. This is a ratio used in epidemiology to compare the observed number of cases/ deaths in a study population to the number of cases that would be expected based on a larger, standard population. The SIR helps to determine if the incidence of cancer in the study population is higher or lower than expected. For example, SIR of 113.4 means the observed number of deaths in the study population is 13.4% higher than would be expected based on the standard population.

⁷⁰ Ibid⁶².

⁷¹ Ibid⁶².

Across the three boroughs, the average life expectancy for females is 83.4 years similar to the London average (83.5 years), while the average expectancy for males is 78 years sitting lower than the London average of 79 years. In London, health inequalities disproportionately impact certain groups and particular areas, such as those experiencing deprivation and ethnic minority groups. For example, the average gap in life expectancy between the least and most deprived Middle Layer Super Output Areas is 4.4 years for males and 6.3 years for females, and South Asian and Black people are 2-4 times more likely to develop type 2 diabetes mellitus.⁷²

The ratio of registered patients to GPs indicates that in North West London (encompassing the constituencies within Brent, Ealing, and Hammersmith & Fulham), there are 2,263 patients per GP. This is higher than the ratio in London, 2,043 patients per GP, and significantly higher than South West London, 1,799.⁷³ Areas of high socio-economic disadvantage are more likely to be impacted severely by poor access to GP surgeries which leads to widening of pre-existing health inequalities.⁷⁴

Data on average estimated prevalence of common mental disorders (% of population aged 16 & over) is displayed in **Table 4-7**. Across the three boroughs Brent consistently has the highest prevalence among the population, among those aged 16+ and 65+, followed closely by Hammersmith & Fulham then Ealing. All three boroughs exceed the London average and the England average across both age groups.⁷⁵

Table 4-7: Prevalence of common mental health disorder (% of population)

Prevalence of common mental health disorder	Brent	Ealing	Hammersmith and Fulham	London	England
% of population 16 years and over	20.8	19.2	20.4	19.3	16.9
% of population ages 65 and over	12.6	11.8	12.5	11.3	10.2

Wider determinants of health such as the rate of complaints about noise (calculated as the number of complaints per year per local authority about noise per thousand population) is also available at borough level. The data highlights a significant variation across the three boroughs. Hammersmith & Fulham has the highest rate of noise complaints at 68.9 complaints per thousand population per year, which is considerably higher than the London average of 40.1 and the England average of 12.0. Brent, with a rate of 12.5, is slightly above the England average but well below the London average. Ealing has the lowest rate of noise complaints among all geographies at 5.7.⁷⁶ Heightened noise levels can negatively affect people who spend more time at home such including older people, people with disabilities and long-term limiting illnesses and pregnant women or women on maternity leave, or those caring for small children. Increased noise levels can also have a differential impact on neurodivergent people who can have heightened sensitivity to loud noises and may struggle to filter out background sound.⁷⁷

4.3.5 Transport infrastructure and connectivity

The Old Oak West SPD highlights that there is an existing lack of infrastructure in the Old Oak area that supports walking, cycling, and people using mobility aids.⁷⁸ Poor transport infrastructure, inadequate connectivity, and substandard active travel infrastructure can disproportionately affect

⁷² Institute of Health Equity (2022) A snapshot of health inequalities in London. Available at: [A snapshot of health inequalities in London - IHE \(instituteofhealthequity.org\)](https://www.instituteofhealthequity.org/)

⁷³ House of Commons Library (2024) Ratio of registered patients to GPs, May 2024. Available at: [Constituency data: GPs and GP practices \(parliament.uk\)](https://commonslibrary.parliament.uk/constituency-data/gps-and-gp-practices/)

⁷⁴ University of Cambridge (2021) Worsening GP shortages in disadvantaged areas likely to widen health inequalities. Available at: [Worsening GP shortages in disadvantaged areas likely to widen health inequalities | University of Cambridge](https://www.cambridge.ac.uk/news-and-features/worsening-gp-shortages-in-disadvantaged-areas-likely-to-widen-health-inequalities)

⁷⁵ Office for Health Improvement & Disparities (2017) Estimated prevalence of mental disorders: % of population aged 16 & over. Available at: [Mental Health and Wellbeing JSNA - OHID \(phe.org.uk\)](https://www.phe.org.uk/publications/mental-health-and-wellbeing/jsna-ohid)

⁷⁶ Office for Health Improvement & Disparities (2017) Estimated prevalence of mental disorders: % of population aged 16 & over. Available at: [Mental Health and Wellbeing JSNA - OHID \(phe.org.uk\)](https://www.phe.org.uk/publications/mental-health-and-wellbeing/jsna-ohid)

⁷⁷ Moller, R. (2024) What do we know about noise sensitivity in Autism?. Available at: [What Do We Know About Noise Sensitivity in Autism? \(abtaba.com\)](https://www.abtaba.com/what-do-we-know-about-noise-sensitivity-in-autism/)

⁷⁸ OPDC (2024). Old Oak West Supplementary Planning Document. Available at: [Old Oak West Supplementary Planning Document \(SPD\) | London City Hall](https://www.london.gov.uk/what-we-do/planning-and-building/planning-policy/planning-policy-framework/planning-policy-framework-supplementary-planning-document)

certain protected characteristic groups, limiting their access to essential services, employment, and social opportunities.

Transport for London research highlights that buses are the most affordable, accessible and widely available mode of public transportation in the city and that younger and older people, those on lower incomes, women and disabled people are more likely to heavily rely on buses.⁷⁹

In terms of active travel, people living in the most deprived areas of London, Black, Asian and minority ethnic groups, disabled people and older adults are less likely to achieve the Mayor's target of 20 minutes of active travel per day. However, Black, Asian and minority ethnic groups are more likely to consider taking up cycling than white Londoners. Barriers to cycling experienced by these underrepresented groups include concerns over road danger, the cost of equipment, fear of harassment, and perceiving cycling as not being for 'people like me'.⁸⁰

Table 4-8 presents the average public transport journey times to access various services within the three boroughs compared to the national average. The data highlights that Hammersmith & Fulham consistently offers the shortest travel times across all service types. For instance, the average journey to an employment centre is 12.5 minutes in Hammersmith & Fulham, significantly lower than Ealing (19.5 minutes) and the national average (29 minutes). All three boroughs have faster access times to all services on average compared to England.

Table 4-8: Average public transport journey times (minutes) to different services⁸¹

Service type	Brent	Ealing	Hammersmith & Fulham	England
Employment centre	17	19.5	12.5	29
GP Surgery	6	6	5.2	11
Primary school	6.7	7	4.9	9
Secondary school	10.1	11.3	8	16

Review of data for North Acton MSOA reveals that 56.8% of households do not own a car or van. This is similar to the proportion in Hammersmith & Fulham, but significantly higher than the proportions in Brent, 44.1%, and Ealing, 36.8%. All of the London geographies have a significantly higher proportion of households that do not own a car or van compared to England, 23.5%.⁸² There are multiple factors that determine car ownership rates; proximity to public transport infrastructure and ease of access to essential services mitigate the need for owning a car, which supports the high proportion of households without a car or van in Hammersmith & Fulham given its low average public transport times to services. Moreover, socio-economic disadvantage is a driving factor behind low car ownership, with 64% of households that earn between £10,000 and £19,999 not owning a car in London.⁸³

Table 4-9 below presents data from the National Travel Survey on the share of trips by travel mode and ethnic group in London in 2021. The data highlights notable differences in travel mode preferences between white and ethnic minority groups in London. White individuals are more likely to drive a car or van, with 23.6% of trips as drivers compared to 17.6% for ethnic minorities. Conversely, ethnic minorities have a significantly higher usage of London buses, at 33.6%, compared to 5.3% among white individuals. Ethnic minorities also use the Underground more frequently (8.3% compared to 5.0%). Both groups show similar levels of walking and cycling. Surface rail usage is more common among white individuals (6.3%) than ethnic minorities (2.8%).

⁷⁹ Transport for London (2024) Equity in Motion. Available at: content.tfl.gov.uk/equity-in-motion-full.pdf

⁸⁰ Transport for London (2024) Equity in Motion. Available at: content.tfl.gov.uk/equity-in-motion-full.pdf

⁸¹ National Audit Office (2020) Transport accessibility to local services: a journey time tool. Available at: [Transport accessibility to local services: a journey time tool - NAO report](#)

⁸² ONS (2022) Census 2021: Census Maps. Number of cars or vans. Available at: [Number of cars or vans - Census Maps, ONS](#)

⁸³ Mayor of London (2023) Car ownership in London. Available at: [Car ownership in London | London City Hall](#)

Table 4-9: Share of trips by travel mode and ethnic group in London, 2021⁸⁴

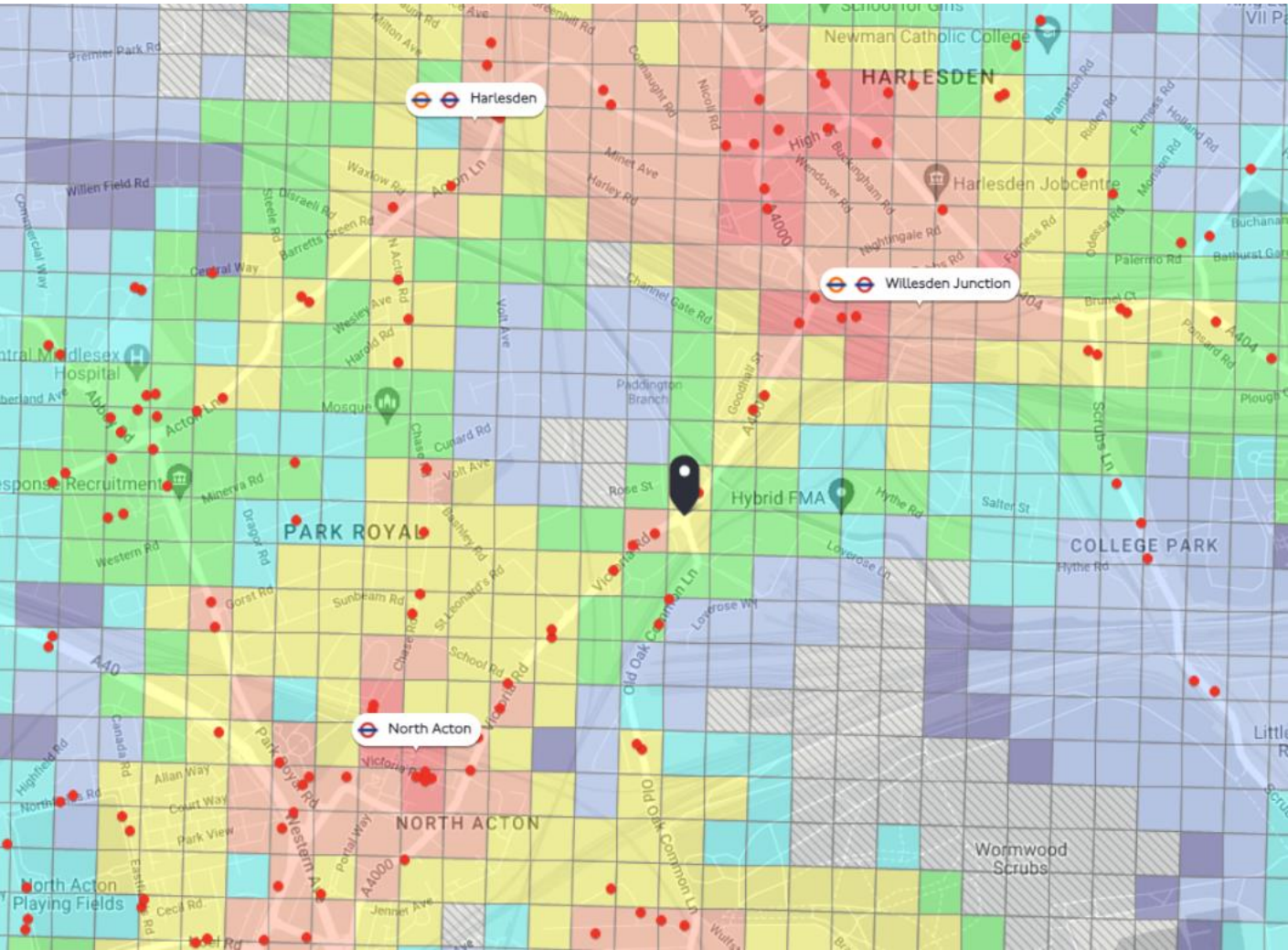
Travel Mode	White (%)	Ethnic Minority (%)
Walk	40.2	37.4
Pedal	3.8	3.9
Car or van driver	23.6	17.6
Car or van passenger	13.5	14.5
London bus	5.3	33.6
Underground	5.0	8.3
Surface rail	6.3	2.8

Figure 4-2 below presents an overview of the Old Oak area through Transport for London's Public Transport Access Tool (PTAL), the tool assesses connectivity (level of access) to the transport network, combining walk time to the public transport network with service wait times.⁸⁵ This highlights that the Old Oak area experiences varying levels of transport connectivity. To the north and south, connectivity is rated between 5 and 6a due to the proximity of Willesden Junction and North Acton stations respectively. However, the majority of the area where businesses and residential streets are located within Old Oak (i.e. between the two stations and along Old Oak Common Lane and Victoria road) has worse connectivity with ratings between 3 and 4 on the PTAL scale.

⁸⁴ Department for Transport (2022) National Travel survey. Data table nts9917. Available at: [National Travel Survey: 2022 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/national-travel-survey-2022)

⁸⁵ TfL (2024) WebCAT. Available at: [Webcat planning tool - Transport for London \(tfl.gov.uk\)](https://www.tfl.gov.uk/roadworks/planning/)

Figure 4-2: PTAL key and map of the Old Oak area



PTAL: a measure which rates locations by distance from frequent public transport services.

Map key - PTAL

0 (Worst)	1a
1b	2
3	4
5	6a
6b (Best)	

Map layers

PTAL (cell size: 100m)

5. Primary research findings

5.1 Introduction

This section presents the findings from the primary research conducted by AECOM's primary research team with Old Oak businesses and residents between **27th August - 20th September 2024 and 12th – 16th June 2025**. This research consisted of survey interviews with **directly** affected businesses and residents as well as businesses and residents affected by the wider regeneration proposals.

The findings in this chapter are representative of survey respondents only- and in some cases there may be a small number of respondents.⁸⁶ These figures and analysis are used to provide OPDC and other interested parties with insights into perceptions and preferences regarding key issues. For the purpose of reporting, we have removed options where no responses were given.

5.2 Directly affected business interests

Surveys were undertaken with businesses that may be directly impacted by the potential CPO to better understand the ownership and use of businesses and organisations within the area and to determine the potential impacts and opportunities of the Proposed Regeneration.

The primary research team approached 30 businesses for surveying. A total of 22 responses were received.

5.2.1 Nature of the businesses

Surveys were only completed by the business owner or manager, or someone who had been delegated permission to complete the survey on the owner or manager's behalf. **Table 5-1** summarises the breakdown of respondent's positions within the business, indicating the majority of respondents (62.5%) were a business manager. All of the respondents stated that they work full-time.

Table 5-1: Business position

Question	Options	Respondents
What is your position within the business?	I own the business/organisation	31.8%
	I am the business manager	54.5%
	Other – I have the permission of the owner or manager to respond to this survey.	13.6%
Response rate	Answered question	22
	Skipped question	0

As shown in **Table 5-2**, 50% of respondents were the main leaseholder of their premises and 22.7% own both the property and land as freeholders. This indicates a high proportion of established businesses and a comparatively low percentage of businesses temporarily renting units.

⁸⁶ The findings of surveys undertaken with two businesses affected by the wider regeneration proposals have not been included in this chapter to avoid identification of the businesses, information relating to the nature of the business and diversity of the owners/employees have been excluded.

Table 5-2: Leasehold status of business

Question	Options	Respondents
What is the leasehold status of your premises?	Freeholder	22.7%
	Main leaseholder	50.0%
	Sub-leaseholder	9.1%
	Other	4.5%
	Don't know	13.6%
Response rate	Answered question	22
	Skipped question	0

Table 5-3 reveals that the majority of businesses that responded are independent (86.4%) while a small proportion fit into other categories including a community organisation (4.5%). This could potentially indicate issues around relocation for the majority of businesses given that they are independent businesses.

Table 5-3: Business category

Question	Options	Respondents
Which of the following best fit the category this organisation fits into?	Independent business	86.4%
	Community organisation	4.5%
	Other	9.1%
Response rate	Answered question	22
	Skipped question	0

Figure 5-1 provides a breakdown of the types of businesses surveyed. The majority of respondents categorised themselves as 'other' (18.2%), namely public transport services, imports and exports, skip hire and waste management, and distribution businesses. The type of business that comprises the greatest individual proportion of those surveyed were manufacturing, construction businesses and car repair/services businesses. Of the businesses that responded, 40.9% are directly open to customers at Old Oak.

Figure 5-1: Business types

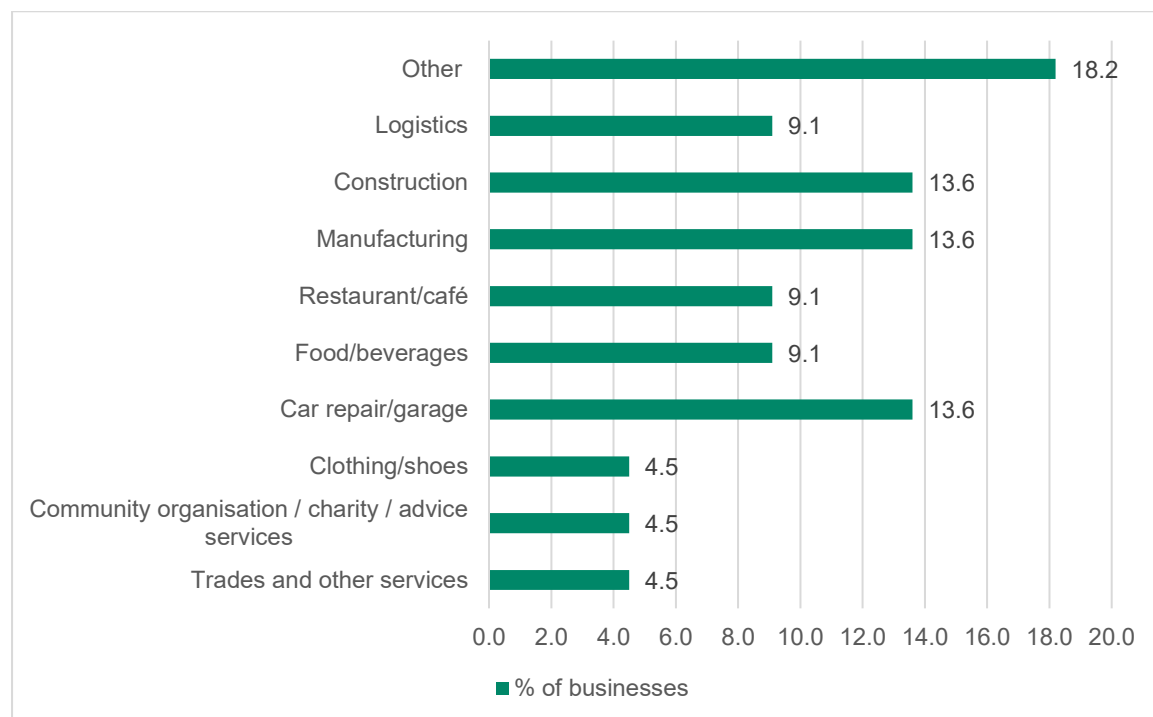


Table 5-4 summarises the length of time that businesses have operated at their current location. Half of the businesses surveyed have been at their current location for over ten years, while only 13.6% of business had been on site for less than 2 years.

Table 5-4: Length of time in operation at current location

Question	Options	Respondents
How long has the business/organisation operated in its current premises	Less than 12 months	4.5%
	Between one and two years	9.1%
	Between three and five years	27.3%
	Between six and ten years	9.1%
	More than ten years	50.0%
Response rate	Answered question	22
	Skipped question	0

5.2.2 Diversity of business owners/managers

The majority of businesses (95.5%) were owned or managed by men. **Figure 5-2** shows the age breakdown of respondents, revealing that half of business owners/managers were aged 35-44 while younger and older business owners represent the smallest proportion of age groups (18.2% each).

Figure 5-2: Age groups of business owners/managers/respondents

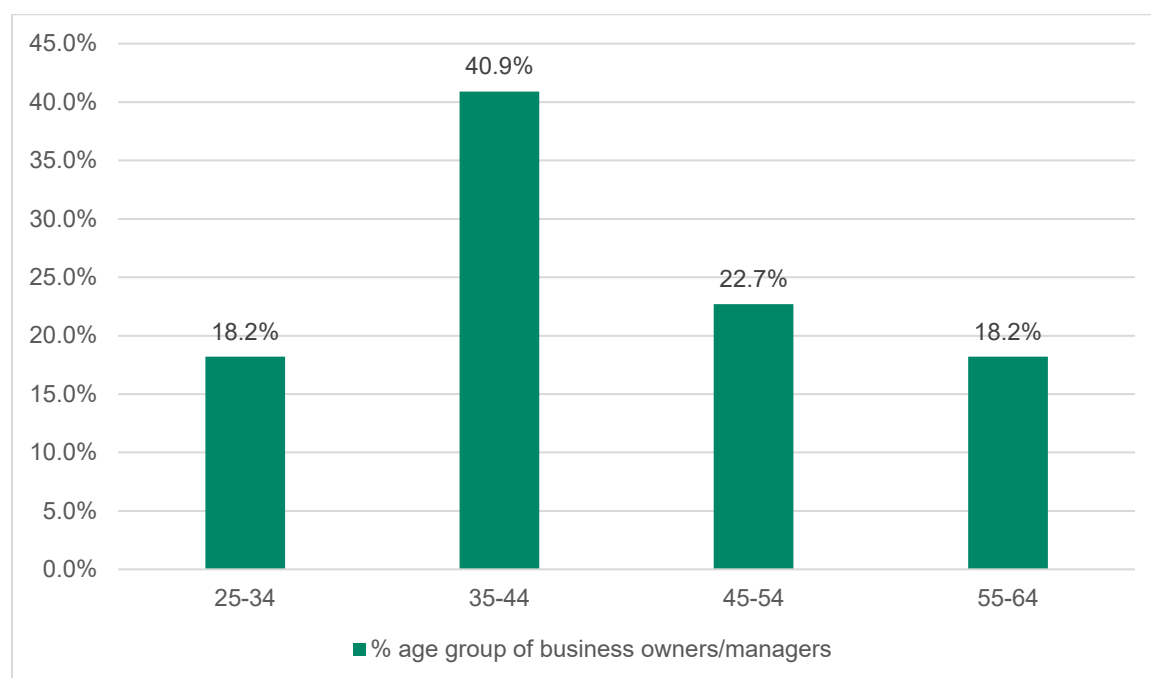


Table 5-5 summarises the ethnic group of business owners/managers. This reveals that the majority of businesses are owned/ managed by people from non-white ethnic groups (63.6%), largely comprised of those who specified ‘other ethnic group’, this includes Persian, South African and Kurdish. None of the respondents indicated that they were asylum seekers.

Table 5-5: Ethnic group of business owners/managers

Question	Options		Respondents
Which of the following ethnic groups do you feel you belong to?	White	English/ Welsh/ Scottish/ Northern Irish/ British	27.3%
		Other	9.1%
	Asian/ Asian British	Indian	9.1%
		Other	9.1%
	Black/ African/ Caribbean/ Black British	Other	9.1%
	Arab		18.2%
	Other Ethnic Group		18.2%
Response rate	Answered question		22
	Skipped question		0

Table 5-6 summarises the religion of business owners/managers that responded. The majority of business owners/managers are Muslim (43.8%), while only 18.8% are Christian.

Table 5-6: Religion of business owners/managers

Question	Options	Respondents
What is your religion?	Christianity	18.8%
	Islam	43.8%
	No religion	25.0%
	Refused/ prefer not to say	12.5%
Response rate	Answered question	16
	Skipped question	6

All of the business owners/managers identify as heterosexual.

5.2.3 Employees

Table 5-7 summarises how many people are employed full-time at the premises, including the respondent. The majority of businesses employ over 6 people (63.7%) with microbusinesses comprising 36.3% of the respondents.

Table 5-7: Number of people employed on the premises full-time

Question	Options	Respondents
How many people are employed full-time at the premises?	One person	13.6%
	Between two and five people	22.7%
	Between six and ten people	36.4%
	Between eleven and twenty people	9.1%
	More than twenty people	18.2%
Response rate	Answered question	22
	Skipped question	0

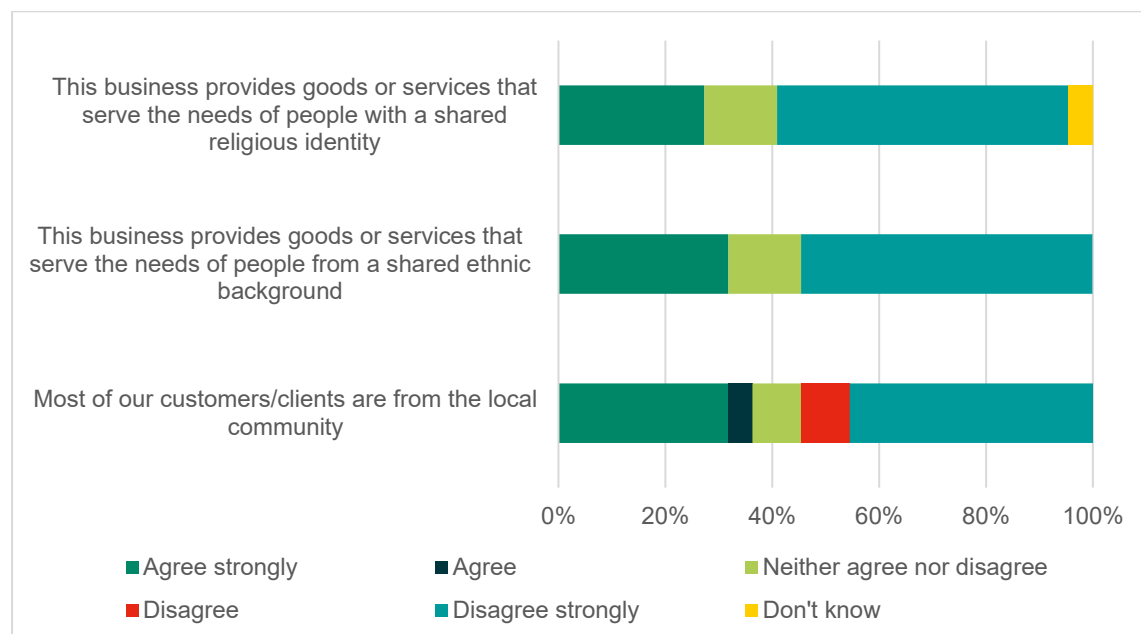
Overall, most businesses reported that their employees belonged to a mixture of ethnic groups with the majority being non-white groups (75.1%), including 31.3% Arab, 31.3% Asian or an Asian ethnic sub-group, and 12.5% reporting that some employees were Black African. While 6.3% of businesses stated they had employees from all of the ethnic groups.

Amongst respondents who stated that their employees were from one ethnic group, the largest proportion were Asian/Asian British (18.8%) compared to 6.3% White.

5.2.4 Profile of businesses' customer base

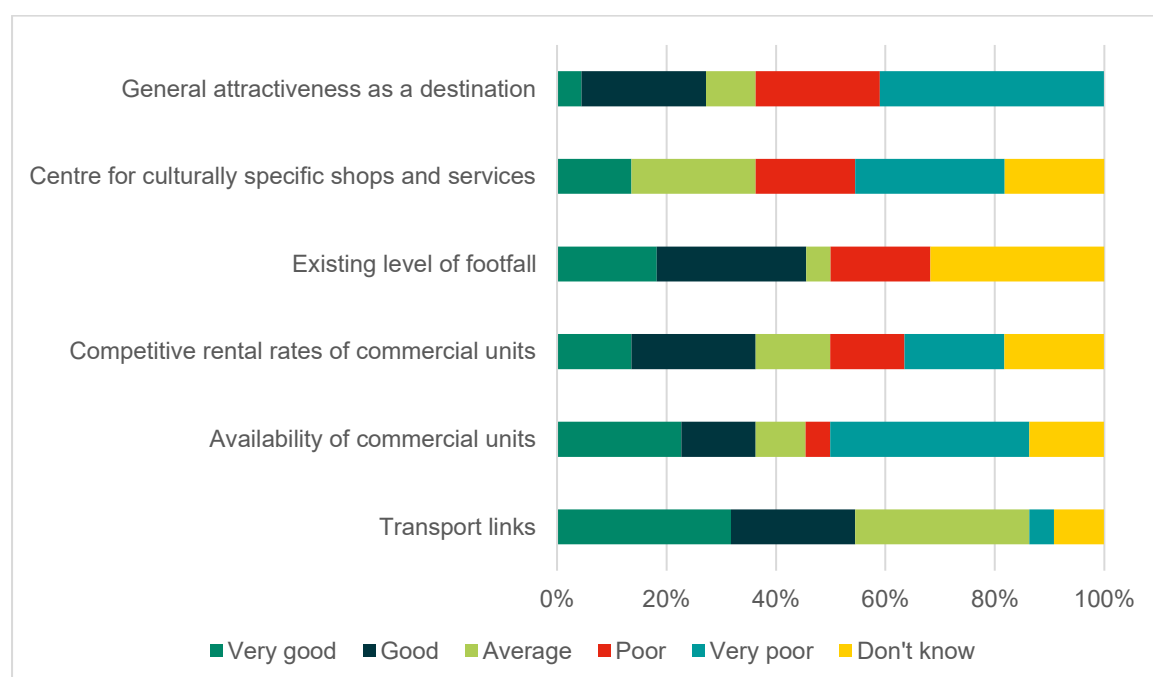
Businesses were asked to confirm the extent to which they agreed with a set of statements relating to their businesses and its customers. **Figure 5-3** demonstrates that less than 40% of businesses agreed that their business serve the local community, a lower percentage agreed that their businesses specifically serve the needs of particular ethnic or religious groups.

Figure 5-3: Shared protected characteristics of customers



Businesses were asked how they would rate the area as a location for business against a number of factors, presented in **Figure 5-4**. Transport links was the factor rated most positively, with 54.5% of respondents rating it as good or very good, while general attractiveness of the destination was rated poor or very poor by the majority of respondents (63.6%). Just under 40% of respondents also felt that the availability for commercial units was poor or very poor.

Figure 5-4: Views on the existing site



5.2.5 Businesses and potential regeneration interests

Table 5-8 summarises businesses preferences if the regeneration of Old Oak were to require them to seek new accommodation. The majority of respondents (66.6%) said they would prefer to relocate in the immediate neighbourhood followed or elsewhere within the Old Oak and Park Royal Development Corporation area. This indicates a preference for businesses to remain within the locally.

Table 5-8: Business relocation preferences

Question	Options	Respondents
In an event where the regeneration of Old Oak would require you to seek new accommodation, what would be the preferred option for your business?	In the immediate neighbourhood (within a 10-minute walk of this address)	47.6%
	Elsewhere within the Old Oak and Park Royal Development Corporation area	19.0%
	Elsewhere in the London Borough of Hammersmith and Fulham	9.5%
	Elsewhere in London	14.3%
	I would consider moving away for a short period but I would like to be relocated back into Old Oak once new properties are here	4.8%
Response rate	Answered question	22
	Skipped question	0

Table 5-9 summarises the measures (if any) businesses would consider helpful in enabling them to continue operating their business. No clear preference was indicated with equal weighting across assistance in finding alternative accommodation, affordable business space and support with the upfront costs.

Table 5-9: Measures to enable businesses to continue operating

Question	Options	Respondents
If the regeneration of the area progresses what measures (if any) do you consider would be helpful in enabling you to continue to operate your business?	Assistance in finding alternative accommodation elsewhere.	33.3%
	Affordable business space	33.3%
	Support with the upfront costs (e.g. help with shop fit out costs)	33.3%
Response rate	Answered question	22
	Skipped question	0

Table 5-10 summarises how respondents to the survey thought relocation of the business would affect their customers. While not every business responded to this question, 63.6% felt their customers would continue with the business wherever they were located. Similarly, the majority of respondents stated that they were confident the business could be set up elsewhere (72.7%). Whilst

the majority of respondents stated they only had one business in the area, three businesses also owned other businesses locally.

Table 5-10: Customer response to relocation

Questions	Options	Respondents
How do you think that the relocation of your business would affect your customers?	Our customers would continue to use our services wherever we were located	63.6%
	Our customers would go to other businesses to use the same services	22.7%
	Not answered/ Don't know	13.6%
Response rate	Answered question	19
	Skipped question	3

5.3 Directly affected residential interests

Surveys were undertaken with residents that may be directly impacted by the CPO to better understand the households within the area and to determine the potential impacts and opportunities of the Proposed Regeneration in meeting residents needs and supporting quality of life.

The primary research team approached 35 residential properties for surveying. A total of 19 responses were received. At least one property was assumed empty at the time of surveying.

5.3.1 Household composition

The following section outlines household composition of the directly affected households that responded to the survey. There are four main types of accommodation represented in these results: temporary accommodation on Old Oak Lane⁸⁷, private renter-occupied households, housing association accommodation and owner-occupied households.

The majority of residents surveyed live in a flat/studio (79%) while the remaining 21% live in a house.

Table 5-11 indicates that almost half (47.5%) of the respondents live in socially rented accommodation. . The same percentage of respondents also indicated that a Social Housing Organisation or the Council own and/or manage their property; This included Hammersmith & Fulham and Ealing Borough Councils and Peabody and Genesis Housing Associations. Only one owner-occupier responded to the survey. This owner-occupier is one of three respondents that live in a house.

⁸⁷ The temporary accommodation is let to the London Borough of Hammersmith and Fulham (LBHF) to provide temporary housing for residents at risk of homelessness whilst LBHF looks into other longer term housing options for these residents.

Table 5-11: Breakdown of housing tenure and landlord

Questions	Options	Respondents
Does your household own or rent this accommodation?	Owns (outright or with a mortgage or loan)	5.3%
	Private rent	47.5%
	Social rent	47.5%
Response rate	Answered question	19
	Skipped question	0
Who is your landlord?	Private landlord or letting agency	42.1%
	Social Housing Organisation/ Council owned	52.6%
	Other (owner occupied)	5.3%
Response rate	Answered question	19
	Skipped question	0

Table 5-12 reveals that almost half (47.4%) of respondents live alone, in a flat or studio. 26.3% of respondents live in larger family size households (4+ people), which are equally split between flats and houses.

Table 5-12: Breakdown of household numbers

Questions	Options	Respondents
How many people live at this address?	One person	47.4%
	Two people	21.0%
	Three people	5.3%%
	Four people	15.8%
	Five people +	10.5%
Response rate	Answered question	19
	Skipped question	0

Table 5-13 summarises the length of time residents have lived at their current address. A large proportion of respondents have lived in their accommodation less than two years, the majority of which are social renters occupying flats/ studios. However, 26.3% of respondents have lived in their current home for more than 10 years, with the majority of these residents living in Wells House Road.

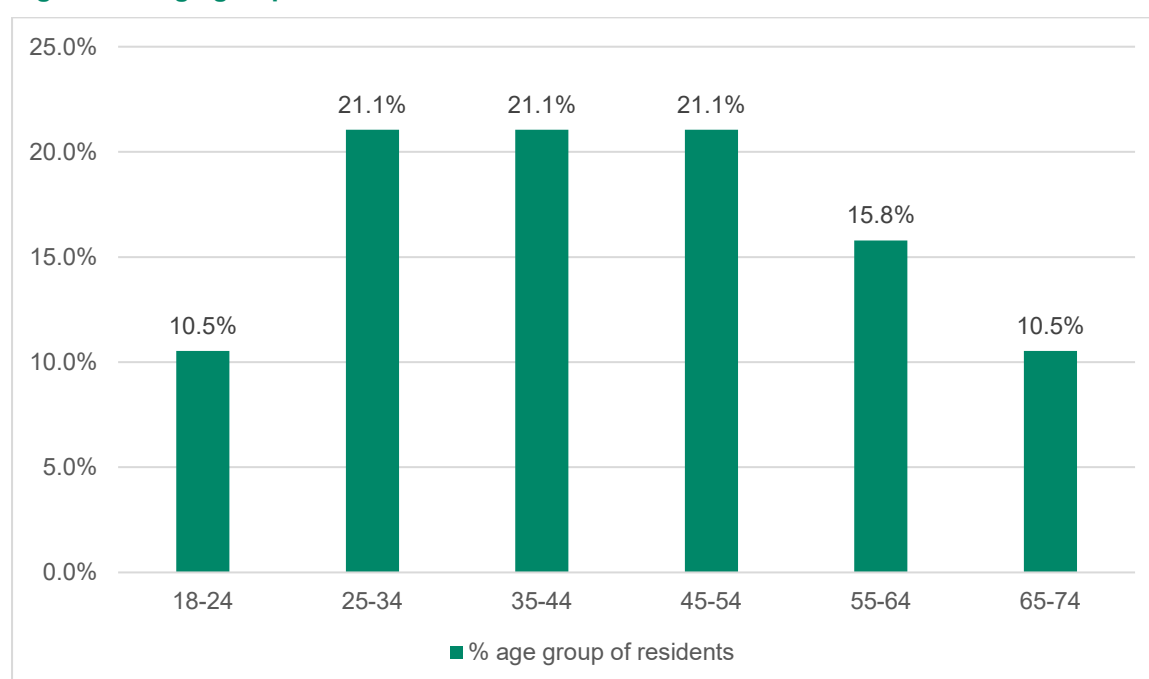
Table 5-13: Residents time at current address

Questions	Options	Respondents
How long have you lived at this address?	Less than 12 months	21.1%
	1 – 2 years	26.3%
	2 – 5 years	21.1%
	5 – 10 years	5.3%
	More than 10 years	26.3%
Response rate	Answered question	19
	Skipped question	0

5.3.2 Diversity of residents

A larger proportion of respondents were female (57.9%). **Figure 5-5** summarises the age group of residents who took part in the survey. The majority of respondents were aged 25–54-years (63.3%). Older residents aged 55 and over made up 26.3% of respondents. The proportion of younger people responding to the survey (aged 18-24) was 10.5%.

Figure 5-5: Age groups of residents



35.7% of residents reported that they or someone in their household has a long-term health problem or disability that limits their own, or another household member's, activities in some way.

Table 5-14 summarises the ethnic group of residents. The majority of respondents are from non-white ethnic minority groups (57.9%), the largest proportion of which identified as Black at 36.9%. One of the residents stated they were an asylum seeker. For many of the respondents taking part in the survey, English was not their first language.

Table 5-14: Ethnic group of residents

Question	Options		Respondents
Which of the following ethnic groups do you feel you belong to?	White	English/ Welsh/ Scottish/ Northern Irish/ British	15.8%
		Other	26.3%
	Asian/ Asian British		0.0%
	Mixed/ multiple ethnic group	White and Black Caribbean	10.5%
	Black/ African/ Caribbean/ Black British	African	21.1%
		Caribbean	5.3%
		Other	10.5%
	Arab		10.5%
Response rate	Answered question		19
	Skipped question		0

Table 5-15 summarises the religion of the residents, indicating that there is a disproportionately large Islamic community within the respondents (26.3%) compared to the local population within Old Oak (17.7% of the population).

Table 5-15: Religion of residents

Question	Options	Respondents
What is your religion?	Christianity	57.9%
	Islam	26.3%
	No religion	15.8%
Response rate	Answered question	19
	Skipped question	0

5.3.3 Residents and potential regeneration interests

As illustrated in **Table 5-16**, in the event that regeneration required residents to seek new accommodation, 42.1% of respondents indicated a preference to remain within the local area (i.e. within a 10-minute walk of their current address). However, collectively 47.4% stated that their preference would be elsewhere within one of the three local boroughs of Brent, Ealing or Hammersmith and Fulham.

Table 5-16: Resident relocation preferences

Question	Options	Respondents
In an event where the regeneration of Old Oak would require you to seek new accommodation, what would be the preferred option for you?	In the immediate neighbourhood (within a 10-minute walk of this address)	42.1%
	Elsewhere in Borough of Brent	10.5%
	Elsewhere in the London Borough of Ealing	15.8%
	Elsewhere in the London Borough of Hammersmith and Fulham	21.1%
	Other	10.5%
Response rate	Answered question	19
	Skipped question	0

To follow up, residents were asked if there were any factors that might affect their choice of new accommodation. Of those that responded, the main factors highlighted were wanting to apply for affordable housing, being unlikely to be able to afford rent for other housing in the local area and having current use of a garden they wouldn't want to lose.

Residents also noted that they felt that the area was 'quiet', 'safe' and 'nice' and had concerns about finding an alternative area to move to with these same qualities.

5.4 Wider residential interests

Surveys were undertaken with residents who are not likely to be subject to acquisition but live within 50m of the red line boundary shown in **Appendix A**.⁸⁸ The purpose of the surveys was to better understand the households within the area and to determine the potential impacts and opportunities of the Proposed Regeneration in meeting residents needs and supporting quality of life.

In total, 54 surveys were undertaken.

5.4.1 Household composition

Approximately half (51.9%) of residents surveyed responded that they live in a house, 42.6% that they live in a flat/studio, and 5.6% live at Bashley Road Traveller Site.

Table 5-17 summarises the types of ownership amongst the indirectly affected residents who were surveyed. The largest proportion of residents own their property (44.4%), the majority of which live in a house. Private rent represents the second largest type of ownership, of which slightly more live in a flat compared to a house while social rent and shared ownership represent the smallest share of ownership.

⁸⁸ Based on the red line boundary as of June 2024. Some minor amendments have been made to the red line boundary since June 2024, however, these do not affect the sampling strategy for the surveys.

Table 5-17: Types of household ownership- Indirect residents

Question	Options	Respondents
Does your household own or rent this accommodation?	Owns (outright or with a mortgage or loan)	44.4
	Part owns and part rents (shared ownership)	1.9
	Private Rent (with or without housing benefit)	40.7
	Social rent	11.1
	Lives here rent free	1.9
Response rate	Answered question	54
	Skipped question	0

Table 5-18 summarises the number of people who live at the address of each respondent. The largest proportion of indirectly affected residents responded that they live in a two-person household at 35.2%, followed by those living in households comprising four or more people (29.6%). While the lowest proportion (16.7%) live in one-person households.

Table 5-18: Number of people who live at the address- Indirect residents

Question	Options	Respondents
How many people live at the address?	One-person	16.7%
	Two people	35.2%
	Three people	18.5%
	Four people+	29.6%
Response rate	Answered question	54
	Skipped question	0

Table 5-19 summarises the length of time residents have lived at their current address. Compared to the potentially directly affected residents, the majority of indirectly affected residents have been at their household for significantly longer periods of time; over a third of indirect residents have lived at their property for more than 10 years, while only 18.5% have lived at their current address for less than two years.

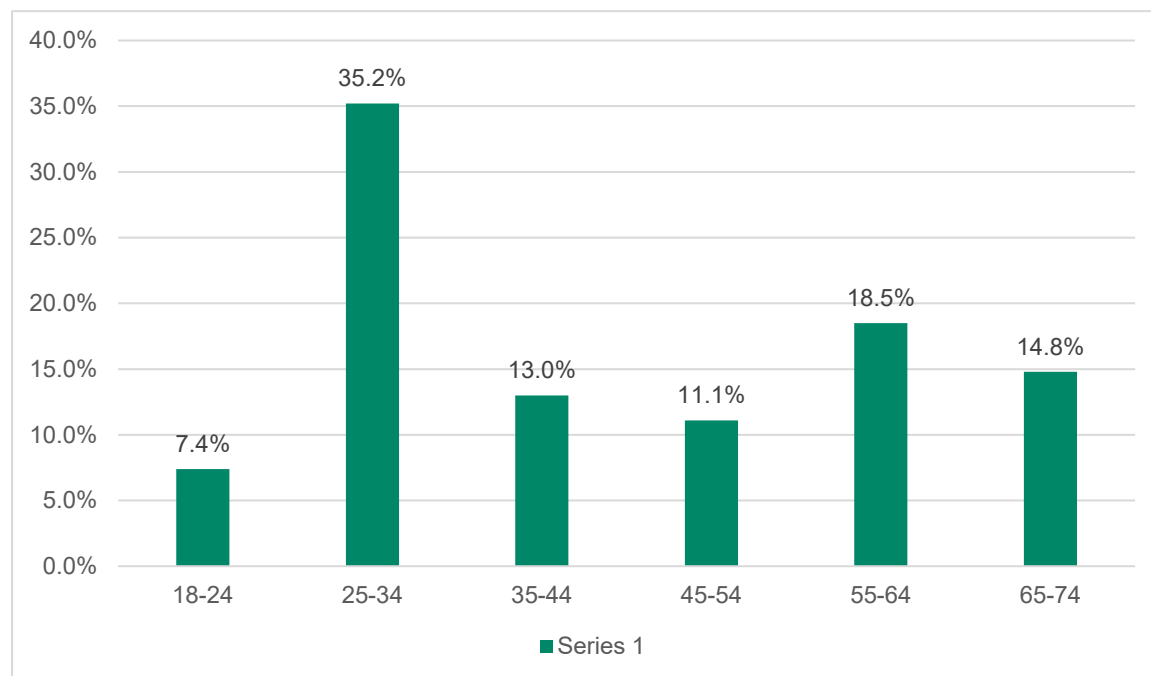
Table 5-19: Indirect residents time at current address

Question	Options	Respondents
How long have you lived at this address?	Less than 12 months	11.1%
	1 – 2 years	7.4%
	2 – 5 years	29.6%
	5-10 years	14.8%
	more than 10 years	37.0%
Response rate	Answered question	54
	Skipped question	0

5.4.2 Diversity of residents

The majority of indirectly affected respondents were male (59.3%). **Figure 5-6** summarises the age groups of indirectly affected residents surveyed. Similar to the directly affected respondents, the largest proportion of respondents were aged 25-34, representing over a third of the total group. While young people (aged 18-24) represent the smallest percentage (7.4%).

Figure 5-6: Age group of residents - Indirect residents



Of the residents surveyed, 7.4% stated they have a long-standing disability or infirmity that has lasted at least 12 months and 5.6% stated another household member has a long-standing disability or infirmity. Of those who stated that they, or someone in their household had a long-standing disability or infirmity, 85.8% stated it does limit their activities in some way.

Table 5-20 summarises the ethnic group of indirectly affected residents that responded to the survey. Non-white ethnic groups represent slightly lower than half of these respondents (48.2%), the largest group being Asian/ Asian British at 22.3%. These proportions contrast to the direct residents, where there was a larger proportion of non-White ethnic groups. One of the indirectly affected residents is an asylum seeker.

Table 5-20: Ethnic group - indirect residents

Question	Options		Respondents
Which of the following ethnic groups do you feel you belong to?	White	English/ Welsh/ Scottish/ Northern Irish/ British	25.9%
		Irish	3.7%
		Gypsy or Irish Traveller	3.7%
		Other White	18.5%
	Mixed/multiple ethnic group	White and Black Caribbean	1.9%
		White and Asian	1.9%
		Other Mixed	1.9%
	Asian/Asian British	Indian	11.1%
		Pakistani	1.9%

		Other Asian	7.4%
	Black/ African/ Caribbean/ Black British	African	9.3%
		Caribbean	3.7%
		Other Black	3.7%
	Arab		3.7%
	Other Ethnic Group		1.9%
Response rate	Answered question		54
	Skipped question		0

Table 5-21 summarises the religion of the indirectly affected residents. The majority of respondents are Christian (46.3%) and the largest religious minority group is Islam at 11.1%.

Table 5-21: Religion - indirect residents

Question	Options	Respondents
What is your religion?	Christianity	46.3%
	Hinduism	7.4%
	Islam	11.1%
	Judaism	1.9%
	Buddhism	1.9%
	No religion	25.9%
	Other (please specify)	1.9%
	Refused/Prefer not to say	3.7%
Response rate	Answered question	54
	Skipped question	0

5.5 Views on regeneration

Alongside the aim of better understanding businesses and residents within Old Oak, the surveys gathered views, opinions and ideas with respect to the wider regeneration project for different groups. Respondents were asked a series of questions regarding what they like/ dislike about living and working the Old Oak area now, as well as what they think will make regeneration successful/ unsuccessful in the future. These responses may provide insight into the potential impacts and opportunities of the Proposed Regeneration in meeting the needs of businesses and residents as well as supporting quality of life. Respondents were asked the following open response questions:

- What are the main (up to 3) thing/s you like about living / working in the Old Oak area now? (write answers)
- What are the main (up to 3) disadvantage/s about living / working in Old Oak now? (write answers)
- What are the main (up to) three things that you think will improve the area and make the regeneration a success?
- What are the main (up to) three things that you are worried about or think would make the regeneration unsuccessful in your opinion?

- Do you wish to make any other comment about the regeneration plans proposed or how these will affect you?

Firstly, respondents were asked if they had previously participated in any of OPDC's community consultation events or surveys on regeneration in Old Oak, including the Local Plan. Across the groups surveyed, respondents that are likely to be indirectly affected had the highest consultation participation rate (22.2%) compared to residents (14.3%) and businesses (12.5%) that may be directly impacted by the CPO.

However, the majority of businesses and residents were aware that there are plans for regeneration in the area around the HS2 station worksites and other land nearby. Directly affected businesses indicated the highest level of awareness, with 87.5% of respondents aware of regeneration plans, followed by indirectly affected residents (85.2%). The lowest awareness was amongst directly affected residents (57.1%).

5.5.1 Overview of responses

The following section explores the collective responses from directly affected and indirectly affected interests, identifying common themes for consideration in the development of the Proposed Regeneration.

When residents and businesses were asked what they liked about living/ working in Old Oak, the following recurring responses were given:

- **Transport and connectivity:** residents and businesses felt that Old Oak is well connected by Underground and Overground services at North Acton and Willesden Junction. Respondents highlighted the benefit of connections to central London which makes commuting convenient for both residents and businesses alike, as well as convenient accessibility for customers and visitors.
- **Sense of community:** responses to the survey highlight a strong sense of community amongst residents that have lived in Old Oak for a long time and who have a good relationship with neighbours. Some residents like that Old Oak can be quiet in the immediate area and maintain privacy as the area is not densely populated. While some businesses identified the benefit of local customer bases who rely on their services, especially long-standing businesses.
- **Local networks:** Residents favour the proximity to essential local amenities such as nurseries, schools and social networks including friends.

When asked what they disliked about living/ working in Old Oak, residents and businesses responded as follows:

- **Industry and construction:** the majority of responses referred to the noise, dust or traffic related issues within Old Oak. While the area is largely industrial, most respondents specified that the ongoing HS2 works is the source of disruption. This is primarily traffic related with road closures, lack of parking and congestion causing delays to resident's daily journeys and businesses trying to reach customers. A few respondents specified that regular hospital appointments and school drop offs have been significantly affected by the current construction activities.
- **Lack of social amenities:** some respondents expressed that there are limited social activities and venues available, in particular there is a scarcity of social meeting places such as pubs and restaurants. The lack of social infrastructure is especially felt by young people and professionals working in the area and has led to a perception that there is not much to do in the local area.
- **Transience:** Some residents expressed that Old Oak has become host to a more transient population which may contribute to a lack of community cohesion.

In terms of views of the Proposed Regeneration, residents and businesses were overall supportive of the proposals for new homes, high streets, local amenities, leisure facilities and green open space. Across the respondents, there was a focus on regeneration making the area a more vibrant and social place. Residents were encouraging of proposals that increase the 'neighbourhood-feel' within Old

Oak. Some respondents also focused on the provision of new affordable homes which was perceived as a benefit of regeneration. One respondent highlighted that these homes need to be 'truly affordable' to the local community it serves.

The main concerns were with the traffic congestion, noise and dust associated with construction activities. The majority of respondents had already expressed dissatisfaction with the ongoing HS2 construction works and indicated that they are concerned about the cumulative impacts as a result of the Proposed Regeneration being undertaken in quick succession. Some respondents also expressed concern about project delays or lack of funding causing elongated construction impacts.

Further, some residents identified concerns surrounding the neighbourhood and community, in particular overcrowding and infrastructure not keeping up with the demand of an expanding population. Alongside this, a few responses thought the regeneration may be unsuccessful through encouraging more transient residents such as students to take up new homes here which could exacerbate the lack of community identity.

5.5.2 Key groups

In analysing the findings of primary research, including views on regeneration, there are a few key groups that have been identified as potentially having different needs compared to the wider population. The following section outlines perceived issues and opportunities as they relate to each of these groups.

Younger People

For the purpose of this analysis, we have considered those aged 18-34 as younger people.

Across directly and indirectly affected younger people that responded to the survey, the majority privately rent (55.5%) and the remaining either own their homes (25.9%) or socially rent (22.2%).

Responses from this age group revealed the following common themes regarding the benefits and disadvantages of living in the Old Oak area:

- **Transport connections:** the majority of younger people mentioned the benefit of good transport links and connectivity to the surrounding local area and London, especially with the option of both overground and underground services nearby.
- **Accessibility to central London:** in particular, this age group highlight how easily they can commute to central London from Old Oak for work.
- **Lack of social life:** younger respondents noted the shortage of social amenities in Old Oak. They identified the absence of socialising facilities such as restaurants, cafés and pubs, which limit their opportunities for social interaction and leisure activities.

In light of these views, younger survey respondents expressed support for the Proposed Regeneration providing increased local amenities including shops and restaurants, making the area busier and more social, and improved public realm including green space and the canalside.

This group also felt that the continued and increasing disruption during construction and the potential for rent to increase as a result of the area becoming more popular could make regeneration unsuccessful.

Older people

Older people, aged 65+, were also identified as a key population group that mentioned the following themes:

- **Local attachment:** Older residents expressed a sense of attachment to the local area as a result of their childhood upbringing being in Old Oak and/ or living in Old Oak for their whole life.
- **Industry and construction:** as with younger people, Old Oak is considered noisy, dusty and polluted as a result of nearby manufacturing and HS2 related construction. Traffic congestion and road works were also identified as drawbacks of living in the area.

However, contrasting views emerged regarding the transience of the population. Some older residents felt that the transient nature of the existing population has decreased feelings of community cohesion, others liked that the local area is quiet and not densely populated. The latter residents expressed concern that regeneration could be unsuccessful because areas may become overpopulated and where there is not enough infrastructure to support the community. One resident also expressed concerns about the loss of light through the construction of new buildings nearby.

There were also a mixture of views regarding public transport services, with a few older residents expressing that public transport provision was not adequate in Old Oak, especially bus services, while others highlighted the convenience of local transport links. This indicates a need to better understand what public transport modes the older population rely on more and whether regeneration could improve this provision.

Muslim community

There is a slightly disproportionately large Muslim population living within Old Oak. Primary research has identified the following common views and opinions about the local area and Proposed Regeneration across directly and indirectly affected respondents from this group:

- **HS2 construction:** this group highlighted the disruption of HS2 construction, particularly noise at night and parking obstructions. Additionally, one resident reported that the inappropriate behaviour of some HS2 workers had made them personally feel unsafe when visiting a nearby park.
- **Increased cost of living:** there is a shared concern across the group about the rising cost of rental and living expenses due to the Proposed Regeneration, especially within large family households.
- **Lack of local services (e.g. schools):** a few respondents indicated dissatisfaction with the provision of good schools for their children and accompanying transport links. Consequently, the group expressed support for plans to provide a new school through the regeneration.

The Proposed Regeneration will result in the loss of community centre that serves the Muslim community.

"What will happen to our place and what we provide to our local community... we are the only place like this that provides this community service in the area."

People living in temporary accommodation

A disparity in views emerged between those living in temporary accommodation provided by the Council compared to other directly affected residents.

While this group were generally supportive of the Proposed Regeneration, when asked to share their views and opinions on living in Old Oak and the Proposed Regeneration there was a high frequency of respondents that stated 'nothing', 'don't know' or 'no idea'. The nature of temporary accommodation and knowledge that this population group is more transient (occupying their accommodation for less than two years), this lack of response implies that residents may not have any attachment to the local area and therefore investment in the Proposed Regeneration. This group may not intend to remain within the Old Oak area with one respondent stating that regeneration may provide an opportunity to leave the Old Oak area.

Of those that did respond, findings highlight that the area is unsafe, dirty and there are often crime related disturbances. Specific incidents reported in the survey relayed events that happened within the temporary accommodation building. Therefore, these disadvantages of living in Old Oak may be reflective of the quality of housing provided by the Social Housing Organisation/ Council.

One respondent stated that "It's just a roof over my head."

Bashley Road Travellers Site

Bashley Road Travellers Site is a designated Travellers Site within the Borough of Ealing. The population occupying the site were identified as indirectly affected interests representing an

established community with protected characteristics. Therefore, it was important that their views and opinions on Old Oak and the Proposed Regeneration were represented in the survey.

While these respondents were generally supportive of the Proposed Regeneration, particularly the provision of new leisure facilities and green open space, the survey revealed dissatisfaction with ongoing construction in close proximity to the Travellers Site. As a result of this, respondents raised concerns about the potential for cumulative construction impacts on their community during the construction period for the Proposed Regeneration. Respondents particularly mentioned construction noise, traffic-related disruption and the safety of residents living alongside construction as current disadvantages that may persist.

Small businesses

The primary research findings indicate that respondents from directly affected businesses predominantly represent small independent businesses, many of which are owned/ managed by people from ethnic minority groups.

The most frequently mentioned benefit of working in Old Oak was the convenience of the location for trading. Businesses mentioned several factors that contribute to this convenience, including established community links and customer bases, proximity to customers in central London, good transport connectivity to bring in business and safety within the area.

Comparatively, businesses most frequently mentioned traffic issues such as congestion, noise, and lack of parking as disadvantages of working in Old Oak, in some cases specifically identifying HS2 as the cause of this disruption. One business expressed that existing traffic levels in the area and the delay caused when trying to reach customers often leads to cancellations.

When asked what would improve the area and make the regeneration a success, businesses provided a variety of responses as follows:

- The majority of businesses identified that regeneration could make the area busier and more 'upmarket'. Increasing the commercial options including new shops and restaurants would make the area more social and welcoming for young people.
- The completion of HS2 would improve transport infrastructure.
- Regeneration could create more job opportunities to the area.

One business stated that the regeneration "sounds good as [it will] bring more jobs to the area / will make the area more upmarket."

Businesses were also asked what they thought the main (up to three) things are that they are worried about, or that they think would make the regeneration successful.

- Some small business respondents expressed concerns about business viability as a result of moving away from their local customer base and the cost of potentially having to relocate, especially for businesses with heavy materials.
- Some businesses had transport related concerns, such as busier local roads and a lack of parking spaces for new residents.
- Individual respondents also stated the following concerns:
 - Crime, poverty and anti-social behaviour;
 - Over trading as a result of increased competition and service provision from businesses occupying new commercial spaces; and
 - Potential for rents increases in the area as it becomes more popular.

6. Stakeholder consultation

6.1 Introduction

This section provides a summary of consultation and engagement activities undertaken with key stakeholders within Old Oak, as identified by OPDC and set out in **Section 2.2**.

6.2 Overview of consultation

All stakeholders were contacted via email between 16th-17th October 2024 to share their views on the regeneration opportunity at Old Oak. Stakeholders were asked the following questions:

- In the event that the Old Oak regeneration results in the loss or change to their current site, do you believe this would have any impact on employees or customers of the organisation? If yes, please describe these impacts.
- Are these impacts likely to have any disproportionate effect due to protected characteristics of employees or customers?

6.3 Stakeholder responses

Out of 15 requests, a total of four stakeholder responded to the email to provide further information on key evidence and issues relating to their role and/ or respond to the questions above. These are summarised in **Table 6-1** below.

Table 6-1: Old Oak stakeholder responses

Stakeholder	Response or information provided
Canal and River Trust	<p>Canal and River Trust attended a Microsoft Teams meeting to share existing resources and knowledge of the water space to inform the assessment of equality impacts. This includes:</p> <ul style="list-style-type: none">• The Grand Union Canal Placemaking Study⁸⁹ - written by the Canal and River Trust in collaboration with OPDC. This study outlines a coordinated vision, strategy, and implementation guidance to support the creation of an active canal community of residents, businesses and developers.• Canal and River Trust have a Code of Practice⁹⁰ that advises on stoppages to maintain navigation and good notice, so that permanent or visitor moorings are notified ahead of disruption.• The potential development of a new east-west bridge would require consultation and engagement with Canal and River Trust prior to consenting.• Visitors can moor for up to 14 days on the Grand Union Canal.• The narrow infrastructure and restrictions to developing on the water space can present constraints in the compliance of design (e.g. gradient of ramps).• Decisions on lighting provision need to balance light sensitivity for biodiversity and feelings of safety for vulnerable users and women on the tow paths at night.• Canal and River Trust identified themselves as a statutory consultee for future planning applications relating to Old Oak.

⁸⁹ OPDC (2019). Canal Placemaking Study. Available at: [Grand Union Canal Placemaking | London City Hall](#)

⁹⁰ Canal and River Trust (2024). Code of Practice: undertaking works affecting our property. Available at: [Undertaking works and code of practice | Canal & River Trust](#)

Stakeholder	Response or information provided
SSEN Distribution	SSEN Distributions identified that extra help and support is offered to customers that are eligible for the Priority Services Register, including disability (deafness, blindness), dependent children, chronic illness and over 60's. Residents and businesses affected by works at Old Oak that meet these criteria may register for priority treatment during planned or unplanned power cuts and emergency power supplies, especially if the customer relies on medical equipment that requires electricity.
Brent Council	Brent Council attended a Microsoft Teams meeting to share the latest information on the housing tenure split and social housing waitlist identified in section 4.3 . This included a demographic breakdown of protected characteristic groups of residents on the housing waitlist, including ethnic minority group, age and disability.
Ealing Council	Ealing Council provided projections for housing need across the Borough based on a Local Housing Needs Assessment undertaken in 2022 ⁹¹ and further analysis undertaken at the end of 2023, as well as confirmation of social housing waitlist numbers.

⁹¹ Ealing Council (2022). Ealing Local Housing Needs Assessment Update: Report of Findings November 2022. Available at: [Ealing Local Housing Needs Assessment update | Ealing Council](#)

7. Assessment of impacts

7.1 Introduction

This section provides an assessment of potential equality impacts associated with the regeneration of Old Oak for protected characteristic groups. This is based on the equalities baseline and key evidence and issues relevant to regeneration and equality groups outlined in the evidence and findings from the primary research.

The assessment considers the following potential equality effects of the following:

- **Direct Impacts** – These include potential direct impacts of the CPO on affected residential and commercial interests;
- **Indirect Impacts** - This includes where acquisition agreements have been made (as of September 2025) with affected residential and commercial interests, but identified residual impacts for protected characteristic groups remain as a result of the acquisition; and
- **Wider Regeneration impacts** – The wider impacts of the regeneration on existing local residents, businesses, employees and visitors (not subject to acquisition or CPO).

These equality effects are assessed below using the assessment framework set out in **Section 2.3**, composed of key equality themes aligned with the SPD principles.

It is important to note that in some cases the number of businesses or households affected may be small (less than 10). In these cases, care has been taken to share information about potential equality impacts in such a way as to not disclose specific data about particular individuals.

7.2 Housing

7.2.1 Direct impacts of the CPO

Loss of homes for owner occupiers in the area

The compulsory acquisition of residential interests on the site will result in the loss of homes for residential freehold owner occupiers and leasehold owner occupiers. OPDC intends to negotiate the purchase of residential interests but intends to exercise its compulsory purchase powers where acquisition cannot be affected by agreement. The acquisition of these interests could negatively impact the one known owner occupier who will experience loss of home on the site.

According to the land assembly summary provided in June 2025, the known owner occupier remains within the Order Land and they are yet to reach agreement for acquisition. There is potential for additional owner occupiers within the Order Land, however the status of all properties was not confirmed at the time of writing.

Owner occupiers are likely to hold a higher degree of attachment and investment into their property and the local area. Groups that could be particularly sensitive to the impact of loss of home and the need to relocate include people from ethnic minority groups, older people, disabled people, families and low income households. These groups may be more reliant on local facilities as well as formal and informal support networks and social ties, including family and friends.

Some owner occupiers may have difficulty in securing a similar property in the area, in other preferred areas or in the new development at an equivalent cost to their current property. This may force some owner occupiers to move out of the area. Others may have no option but to join the private rental sector if they are unable to find an affordable equivalent home. Further adverse impacts may be experienced by older people, those with low incomes as well as some non-UK born residents or residents from religious groups who may find it difficult to transfer mortgages or apply for a new mortgage on a new property.

Homeowners may also encounter unplanned relocation expenses due to the compulsory purchase of their property. These costs can include moving services, transportation, storage fees, and sometimes temporary housing and could disproportionately affect low-income households. Those with mobility

restrictions such as elderly and disabled residents may need additional non-financial support to help with moving.

The primary research undertaken for the EqIA has identified directly affected residents that have one or more of the protected characteristics identified above as sensitive to the loss of homes. Therefore, the needs and requirements of these groups in the CPO process need to be considered including the types of financial and non-financial support that are suitable for relocation and minimising disruption of the CPO.

The Land Assembly and Relocation Strategy⁹² outlines the acquisition activities OPDC has implemented with affected residents within the Order Land. This includes adherence to the CPO compensation code in offering eligible homeowners whose interests are acquired pursuant to a CPO compensation calculated in respect of land acquired. Further, a designated OPDC Officer will be allocated to engage with each resident and consider assistance on a case-by-case basis, including forward funding costs and flexibility on the timing of acquisition.

OPDC has also appointed a Resident Friend⁹³. The Resident Friend will act as an intermediary and approach owner occupiers to provide professional advice on the CPO process, support representations and liaise with professional advisors on the residents' behalf. While not a legal requirement, OPDC has committed to funding this service in order to ensure independent advice is accessible for all affected residential interests. In particular, those unable to afford their own independent advisor and those who may be vulnerable or require assistance in understanding or navigating the legal and procedural complexities.

Recommendation: In addition to the activities within the Land Assembly and Relocation Strategy, it is recommended that OPDC develop a Residential Occupier and Engagement Strategy for internal use. This should outline the further financial, non-financial and professional support that will be available to owner occupiers included how affected residents can be signposted to professional support services and reimburse reasonable costs for professional advisors. Residents may also require support and information in different languages or formats.

The Residential Occupier and Engagement Strategy should also include details about how impacts on owner occupiers will be monitored throughout the relocation process. This should demonstrate financial and non-financial support provided and success of the relocation, as well as how direct engagement with owner occupiers will be undertaken in the long-term to measure successful relocation.

Loss of homes for private renters

The potential for OPDC to need to use compulsory purchase powers to acquire residential interests on the existing site may also result in a loss of approximately 18 privately rented accommodations.

According to the land assembly schedule provided in June 2025, one residential leasehold has been acquired and there are approximately 10 private rented properties within the Order Land that have yet to reach agreement. A further 7 leaseholders have been supported through relocation following the acquisition of a freehold for an apartment building. OPDC is actively undergoing discussions with remaining private renters in the area and providing support in identifying alternative accommodation that meets the requirements of the tenants.

There is potential for additional affected interests who are private renters within the Order Land. However, the residential status of occupiers for all properties was not confirmed at the time of writing. OPDC has committed to undertaking further surveys where new residential interests have been identified through changes to the Order Land and land assembly summary.

Privately rented properties include private tenants from protected characteristic groups including ethnic minority groups, older people, disabled people as well as households with children. These groups could be particularly sensitive to the impact of the CPO as they may lose important social and community ties if they need to move away from the area. These groups are likely to rely on local service and amenity provision, including transport links, shops, nurseries and schools, as well as

⁹² OPDC (2025). OPDC Board Meeting Minutes: Appendix 2 OPDC Land Assembly and Relocation Strategy. Available at: [\(Public Pack\)Agenda Document for OPDC Board, 05/02/2025 14:00](#) [accessed 20/05/25].

⁹³ A Resident Friend is an independent advisor appointed by OPDC that will approach residents subject to the potential CPO and offer support understanding the process and identify particular needs of residents in reaching agreement and relocating.

formal and informal support networks. However, it is also recognised that this is a risk that already exists with shorthold private rental agreements.

Primary research with private tenants undertaken for this EqIA showed a preference to remain within the immediate neighbourhood or surrounding Boroughs of Brent, Ealing or Hammersmith and Fulham. However, relocation is dependent on the availability and affordability of private rental accommodation in areas that meet their needs.

Tenants may also face unexpected relocation costs associated with the CPO of residential properties, including moving assistance, transportation, storage fees and in some cases temporary housing between tenancies. These unplanned expenses may disproportionately impact low-income households as well as elderly and disabled people who may require additional assistance. The acquiring authority should consider mitigation for the potential financial strain of relocation.

The Land Assembly and Relocation Strategy⁹⁴ outlines adherence to the CPO compensation code for private rental units which are acquired pursuant to the CPO. These interests may be eligible for disturbance payment to cover reasonable expenses incurred as a result of the move. In addition to a designated OPDC Officer, short term “lease back” of property may be considered for private renters affected by acquisition.

Private renters will be entitled to the services of the Resident Friend previously mentioned, particularly those who may be vulnerable or require assistance understanding the legal procedures, as well as reimbursement of reasonable cost for professional independent advisors.

Recommendation: OPDC should maintain compliance with the compensation and support services outlined in the Land Assembly and Relocation Strategy.

It is recommended that OPDC develop a Residential Occupier and Engagement Strategy, which includes details of any additional financial compensation towards rent and relocation services, including hardship and affordability payments⁹⁵, and support in finding a new property. Where required, information on relocation should support language and accessibility requirements for private renters.

OPDC should continue to identify the needs of tenants and work closely to identify specific needs in relocation properties and support. This may include the Resident Friend services acting as an intermediary and approach private renters to provide professional advice.

Loss of temporary accommodation currently leased by the Council

OPDC is negotiating with existing property owners to acquire freeholds and leaseholds by agreement prior to the regeneration of Old Oak. This includes a block of 21 temporary accommodation studios located on Old Oak Lane. These properties are owned by a Property Services Company and let to London Borough of Hammersmith and Fulham (LBHF). The accommodation provides temporary housing for residents at risk of homelessness whilst LBHF looks into other longer term housing options for these residents.

This temporary accommodation is occupied under a Private Licence Agreement, meaning that any licensee/s have been granted permission to stay in the property by LBHF, however they do not have the same legal rights as other housing tenants. For example, a licensee is only entitled to ‘reasonable’ notice to leave dependent on what is considered fair and adequate under the circumstances unless their agreement states otherwise. The acquisition of the property would result in a loss of temporary housing, potentially disproportionately negatively affect those from socio-economically disadvantaged backgrounds, refugees and asylum seekers and those who are at higher risk of homelessness such as young people and people from certain ethnic minority groups, as identified through the primary research conducted with residents.

The primary research also showed that the length of time living in the property (**Table 5-13**) was on average shorter than other residents of the area, however the majority indicated a preference to remain within the immediate neighbourhood or surrounding boroughs (**Table 5-16**). Frequent

⁹⁴ OPDC (2025). OPDC Board Meeting Minutes: Appendix 2 OPDC Land Assembly and Relocation Strategy. Available at: [\(Public Pack\)Agenda Document for OPDC Board, 05/02/2025 14:00](#) [accessed 20/05/25].

⁹⁵ These payments are financial benefits provided to individuals and/ or families that are experiencing financial difficulties (hardship payments) or rising costs of living (affordability payments). These payments are intended to cover essential living costs, such as housing and utilities during the period of financial difficulty.

residential relocation has been associated with adverse socio-economic outcomes including labour market activities and health and wellbeing.⁹⁶

OPDC has been engaging closely with LBHF as a key stakeholder in the Proposed Regeneration. OPDC has agreed terms for a licence pending development so that LBHF can continue to provide temporary accommodation until the units are required for the Proposed Regeneration.

LBHF has an obligation under the main housing duty to provide temporary accommodation until such time as the duty is ended, either by an offer of settled accommodation or for another specified reason. As such LBHF, will support occupiers to find suitable alternative accommodation and support relocation.

However, successful relocation will depend on the availability of temporary or low-cost accommodation that meets the needs of these residents within their preferred area. Suitable accommodation may not be available in the neighbouring Boroughs of Brent, Ealing or Hammersmith and Fulham and, as a result, residents may be displaced elsewhere in London or outside London. The planned regeneration of Old Oak seeks to unlock up to 9,000 new homes, including affordable homes. However, the extent to which vulnerable groups such as those living in temporary accommodation, will benefit from this is dependent on the provision of new housing that meets their needs and their own priority status on local housing waiting lists managed by the boroughs.

Recommendation: OPDC should consider how they can support LBHF in minimising any negative impacts on temporary accommodation occupiers as a result of acquisition. For example, supporting LBHF in avoiding homelessness through allowing occupancy of temporary accommodation units until the site is required for regeneration. Whether in partnership with LBHF or through an independent advisor, OPDC should also provide occupiers with clear and accessible information regarding the acquisition of the site, their rights with regard to relocation and clear signposting to the services provided by LBHF as the Housing Authority. This may require a Resident Friend specialising in outreach with homeless or vulnerable people.

OPDC should consider the need for translation services and providing information in different languages or format given there is a high percentage of ethnic minority groups living in the accommodation.

Loss of homes for Housing Association residents

Further to the residential properties required for the regeneration of Old Oak and potentially subject to CPO mentioned above, there is also two known properties owned and managed by social housing associations (Peabody Trust and Notting Hill Genesis). This could potentially result in the loss of homes for social rent in the area and the displacement of existing housing association residents.

As of September 2025, OPDC is currently engaging with the affected housing associations and their tenants. OPDC has also committed to undertaking additional surveys where new residential interests have been identified through changes to the Order Land and land assembly summary to attempt to determine any specific equality impacts. These activities will also aim to identify appropriate mitigation measures and actions to minimise negative impacts on tenants.

Social housing tenants are more likely to have low household incomes and rely on social housing for affordable rent. Options for securing new housing may be more limited than for those who are able to afford higher rents or to buy property in their preferred area. Families with children, older people and disabled people may have specific needs with regards to accommodation, including number of bedrooms, accessibility adaptations and security or support measures. Ethnic minority groups, older people, disabled people and families may rely on informal or formal support networks locally as well as local schools, healthcare and community facilities. Moving to a new home may also disrupt existing benefit arrangements and result in loss of household income on a temporary or permanent basis. Some residents, such as older people and disabled people, may have greater difficulty in moving due to health issues or mobility restrictions.

⁹⁶ Jiang, N., Pacheco, G. & Dasgupta, K. Understanding the transient population: insights from linked administrative data. *J Pop Research* **36**, 111–136 (2019). Available at: [Understanding the transient population: insights from linked administrative data | Journal of Population Research \(springer.com\)](https://doi.org/10.1007/s11266-019-00000-0)

As a social housing landlord, the affected housing associations are considered as public authorities.⁹⁷ Therefore, they also must pay due regard to PSED in relations to their decisions during land acquisition. Tenants will also be covered by housing association policies with regards relocating to a new home. For example, Peabody has an Alternative Accommodation (Decants) Policy⁹⁸ in place which sets out their approach to rehousing residents in alternative accommodation. Notting Hill Genesis has Relocation Policy⁹⁹ which sets out the approach to relocating tenants when they are required to move from their home due to the sale of their property.

Recommendation: Depending on individual tenancies, tenants may be eligible for home loss payments or disturbance payments. Engagement with Housing Associations should seek to identify the level of support being provided to tenants and identifying where further support may be needed directly from OPDC to provide successful relocation of tenants.

7.2.2 Wider regeneration impacts

Net increase in housing provision in Old Oak

The CPO would enable acquired land to be available for the purposes of the Proposed Regeneration. This includes unlocking up to 9,000 new homes, with a target of 50% affordable housing of which 60% is targeted to be social housing (i.e. social housing will comprise roughly 30% of the total new homes provided). A net increase in homes is anticipated to meet the demand of an expanding population, with population growth at Old Oak exceeding London and the wider national growth in recent years.

Additionally, the plans in the SPD include:

- 25% of properties to be family housing - it is considered that an increase in the provision of housing suitable for families would also have a positive impact for children.
- Co-living, shared housing and student accommodation – all of which provide increased options for younger people and those on low-incomes to live in the area;
- Wheelchair accessible housing - providing options for people with disabilities. Also, the population aged 65+ is projected to increase significantly over 20 years across all boroughs. An increase in the number of elderly people will require appropriate housing that meets their needs. Housing implications include increased demand for both specialist accommodation for older people and for services and home adaptations to enable older people to remain 'at home' living independently.
- All new residential properties to conform to modern 'lifetime homes' standards in line with the London Plan, which means they are more suitable for adaptation throughout the span of residents' lives.
- Affordable housing which could be provided as:
 - Homes for Intermediate rent, shared ownership or Discount Market Sale - this a type of affordable housing targeted at individuals who struggle to afford market rent and do not qualify for social rent. Specific groups with high needs for access to housing and high representation amongst those living in Old Oak include people from minority ethnic groups, elderly people and younger age groups. These groups could particularly benefit from new housing associated with the Proposed Regeneration, except where affordability barriers could limit these opportunities.¹⁰⁰
 - Social housing - is provided by local councils to local residents who register to the social housing waitlist. Addressing the needs of those on the social housing waitlist is crucial for addressing housing inequalities and ensuring fair allocation of resources. Within the surrounding Boroughs of Brent, Ealing and Hammersmith and Fulham an estimated 42,500 residents are on the housing register. The provision of affordable

⁹⁷ Disability Rights UK (no date). London and Quadrant Housing Trust. Available at: [R \(Weaver\) v London and Quadrant Housing Trust \[2008\] EWHC 1377 \(Admin\); \[2008\] WLR \(D\) 207 | Disability Rights UK](#)

⁹⁸ Peabody (2023). Policies and insurance. Available at: [Policies and insurance - Peabody](#)

⁹⁹ Notting Hill Genesis (2024). Relocation (Decant) policy. Available at: [relocation-policy-v20-16012024-1.pdf](#)

¹⁰⁰ Human City Institute (2017) Forty Years of Struggle: A Window on Race and Housing, Disadvantage and Exclusion <https://humancityinstitute.files.wordpress.com/2017/01/forty-years-of-struggle.pdf>

homes for social rent is a benefit that can be shared by those with protected characteristics who are typically overrepresented on the social housing register, particularly low-income households and ethnic minority groups.

The groups mentioned above particularly stand to benefit from new housing associated with the regeneration, except where affordability barriers could limit these opportunities. In particular, new private housing in the area may be beyond the means of many local residents. Primary research undertaken for this EqlA highlighted a concern amongst residents that the new affordable housing may not be truly affordable. Where intermediate rent is provided, it is recommended that this should include a mix of lower rental quartile and London Living rent¹⁰¹ to help to make it more affordable to local people.

The demand for social housing currently exceeds supply, resulting in long wait times for successful applicants. The wait times for larger family-sized homes, such as 4-bed and 5-bed units, are the highest across all the priority bands, highlighting a shortage for these types of accommodation. These demographic and demand trend highlights the need for targeted policies and interventions to address the specific housing needs of these communities, ensuring that the allocation process is equitable and responsive to the needs of vulnerable and protected residents.

There is also an on-going need to provide more settled accommodation for homeless households. There may be an opportunity for the regeneration to help address the needs of vulnerable people in the area through suitable housing and other forms of support, which may benefit people belonging to certain protected groups including young people.

While the provision of new homes positively contributes to establishing a thriving new community, there is still a need to safeguard existing residents, especially those with specific needs such as the gypsy and traveller community. OPDC has recognised the importance of this and Bashley Road Gypsy and Travellers Site has been safeguarded within the SPD.

OPDC has published a Regeneration Strategy that outlines a commitment to delivering new and affordable homes, including a mix of housing types and tenures to complement to diversity of the area and maximise affordability such as family homes and homes for later living.

Recommendation: OPDC should develop housing strategies/ policies, such as a Local Lettings Plan (LLP), in collaboration with the local boroughs for the new additional affordable housing supply. This should aim to prioritise local people especially those in the most need and be subject to consultation with these groups.

Potential increase in house prices and private rents

The Proposed Regeneration has the potential to increase residential property and rental prices as a result of improvements to the area. Old Oak aims to become a new urban district with an enhanced public realm and Canalside with commercial space, new homes and new high streets including shops, cafes and restaurants. This could increase the attractiveness of Old Oak as a neighbourhood and simultaneously increase the cost of living and widen the affordability gap.

While there is no explicit evidence that house prices will increase as a direct result of the Proposed Regeneration, primary research undertaken for this EqlA reveals contrasting views on rising house prices across indirectly affected residents. Some of the younger respondents (aged 18-35) expressed concern that increasing house prices would make the regeneration unsuccessful. This age group typically comprise first time buyers who may become priced out of the local housing market and be forced to move away from local family and community ties. While other respondents perceived the potential increase in house prices as an improvement to the Old Oak area. This perspective may reflect the potential benefits on current home owners whose property could increase in value as a result of the Proposed Regeneration.

¹⁰¹ London Living Rent levels are derived from average local incomes and ward-level house prices using a multi-stage process. Broadly, the rent for a 2-bedroom property is based on one-third of the local median household income, and across London as a whole comes to around £1,030 a month, or two thirds of the median monthly market rent in London of £1,500 reported by the Valuation Office Agency for 2018/19. Rents for LLR homes vary according to their number of bedrooms. Using the two-bedroom rents for each ward as a benchmark, the rent for a 1-bedroom home is 10% lower, for a 3-bedroom home 10% higher and for a 4-bedroom home 20% higher. As a final affordability safeguard, the rent for any individual unit must be at least 20% below its assessed market rent. <https://www.london.gov.uk/programmes-strategies/housing-and-land/improving-private-rented-sector/london-living-rent>

Similarly, improvements to the local area could generate higher residential rents and higher costs of living. This could result in non-traditional households ('sharers') or circumstances where more than one household may have to live within the same property and, in some cases, low-income groups who can no longer afford to stay in their current neighbourhoods may have to relocate. While all groups could be affected, this is likely to have a disproportionate impact on young people, ethnic minority groups, large family households and low-income households. The negative impacts of gentrification are often felt disproportionately by ethnic minority groups, who may have fewer options for relocating and retaining community cohesion than their white counterparts and compose the largest ethnic group within Old Oak.¹⁰²

The aforementioned Regeneration Strategy outlines OPDC's aim to deliver a range of homes and maximise affordability in the rental and housing market. The Strategy also highlights the ambition to maximise public investment in affordable and supported housing to optimise the positive impacts realised by the Proposed Regeneration for the local community.

Recommendation: OPDC should consider opportunities for local people to benefit from the availability of new homes in the area, including affordable, family and specialist housing.

Changes to the urban landscape

The Proposed Regeneration includes plans for buildings at increased heights across the area. This change to the urban landscape may result in a loss of light on neighbouring residential properties. Some change in existing light levels- as part of urban regeneration- is likely inevitable if the Proposed Regeneration is to deliver adequate new homes. However, these potential impacts will be dependent on the height parameters and location of new residential units.

For properties which do experience a loss of light as a result of the Proposed Regeneration, equality effects may arise where a resident is more sensitive than other people, due to protected characteristics. Individuals who spend more time at home could experience longer periods of exposure to changes in light, such as older people, people with disabilities and long-term limiting illnesses and pregnant women/ women on maternity or those caring for small children. The privacy of local residents may also be compromised should their property be overlooked by any new housing.

The acceptability of the above potential impacts will be considered through the planning process through the preparation of supporting assessment work.

Recommendation: The design and placement of new homes should respond appropriately to the urban context with minimal effects to the majority of neighbours. A Daylight and Sunlight Assessment should be undertaken to calculate the potential change in light levels between the existing development and proposed development on neighbouring buildings. In order to minimise any shift in light levels and balance neighbours' loss of light while maximising housing delivery, the proposed design of new housing should consider limiting building height, maximised separation distances and setting back the tallest elements of the scheme.

7.3 Employment, skills and training

7.3.1 Direct impacts of the CPO

Business closure/ non-viability of business

To facilitate the Proposed Regeneration, OPDC is looking to acquire approximately 35 business premises. Where possible, OPDC is negotiating to acquire these freeholds and leaseholds prior to regeneration. However, the CPO process may result in the compulsory purchase of business interests that do not reach agreement. Without appropriate or affordable relocation opportunities, the CPO would result in the voluntary or involuntary closure of businesses.

As of September 2025, OPDC has acquired the freehold for approximately 15 business units and is engaging with the remaining business interests to agree terms for acquisition.

¹⁰² Stanford Report (2020). Stanford professor's study finds gentrification disproportionately affects minorities. Available at: [Gentrification disproportionately affects minorities | Stanford Report](#)

Equality effects can be experienced where the pattern of affected business owners or employees affects a single ethnic group, or other patterns in terms of protected characteristics, including effects of changes to clustering of businesses offering services to a common customer set. Of the business owners/ managers that responded to the primary research, 62.5% were from non-white ethnic minority groups and 43.8% were from religious minority groups. Thereby, there may be sensitivities around minority groups experiencing disproportionate negative impacts as a result of the potential CPO.

Primary research undertaken for this EqlA identified some concerns that the cost of relocating and losing a local customer base would have implications for the future viability of their business. Some businesses may not feel confident that their business could be set up elsewhere because they rely on local customer bases, especially those identified as catering for people from the same shared cultural, religious or ethnic background. Businesses expressed a preference to relocate within the immediate neighbourhood (56.3%) or elsewhere within the OPDC area (18.8%) which may reflect this dependence on a local customer base, as well as 20% identifying the customer base and community connections a main benefit of currently working in Old Oak.

The ability to cover the financial cost of moving commercial spaces and find alternative affordable rental units could also influence business closure rather than relocation. In particular, smaller independent businesses may struggle to absorb the financial impact of relocation while establishing a new customer base. While not all of the potential directly affected business interests were captured in the primary research undertaken for this EqlA, of the businesses that responded, the majority were independent businesses (over 80%) and had been operating for over 10 years (56.3%), thereby disproportionate loss of livelihood for business owners/ managers may be experienced across Old Oak.

At this stage, the availability of new commercial units that could be available for relocation within the Proposed Regeneration has not yet been determined, although it is anticipated that around 2,500,000 ft2 of new space will be available for commercial purposes. However, primary research highlighted the concern of existing businesses being priced out of the area as a result of regeneration increasing the attractiveness of Old Oak as a business destination.

For businesses interests yet to agree terms for acquisition, OPDC should adhere to the CPO compensation code which will provide eligible businesses acquired pursuant to the CPO with financial compensation to cover costs of land and other related costs. OPDC are exploring the early release of these compensation payments where required. These payments are typically only paid after vacant possession is provided and therefore employing a policy to make payments to those eligible in advance of needing to vacate could be used to support a successful relocation i.e., to pay deposits, fund relocation expenses, etc.

The Land Assembly and Relocation Strategy¹⁰³ sets out activities that OPDC has been implementing for businesses within the Order Land. This includes assigning a Business Engagement Officer to each business as the principal point of contact for supporting through acquisition and relocation. OPDC has also identified of alternative business units to help retain local businesses and jobs within the area or the wider West London region where the needs of the current business are met. The Strategy outlines that OPDC may also need to collaborate with businesses to support relocation elsewhere in London or beyond if that better aligns with their operational needs. OPDC also have an internal toolkit to help guide officers through the business acquisition process.

Recommendation: OPDC should continue offering CPO compensation and relocation support through implementing the Land Assembly and Relocation Strategy in respect of all businesses within the Order Land.

Temporary or permanent loss of employment following closure or relocation of businesses

Without appropriate or affordable relocation opportunities, the CPO would result in the closure of businesses where they are unwilling or unable to relocate, with associated loss of employment. Employees and self-employed workers at affected businesses may experience temporary or

¹⁰³ OPDC (2025). OPDC Board Meeting Minutes: Appendix 2 OPDC Land Assembly and Relocation Strategy. Available at: [\(Public Pack\)Agenda Document for OPDC Board, 05/02/2025 14:00](#) [accessed 20/05/25].

permanent loss of employment and income until relocated or where the employer closes, downsizes or relocates elsewhere.

Negative equality effects may arise where affected employees disproportionately share a protected characteristic group or have other protected characteristics which make them more sensitive to the Proposed Regeneration. Primary research findings show that every business had employees, the majority of which employed between six and ten people and are from ethnic minority groups. The temporary or permanent loss of employment is also particularly important for any family-run businesses, where more than one member of the family work for the business and could experience a loss of livelihood as a result of the regeneration.

The potential for equality effects is dependent not only on the business's viability in relocation, but also whether the new location is appropriate and accessible for employees. For example, primary research identified the beneficial transport links at Old Oak which provide well-connected and low-cost access for employees, especially those without access to a private vehicle. Therefore, premises for relocation may need to consider how accessible they are for employees.

The aforementioned Land Assembly and Relocation Strategy¹⁰⁴ outlines OPDC's activities with business interests, including identifying alternative business units and prioritising local businesses and jobs within its area. Eligible businesses are also entitled to a Business Engagement Officer that supports business owners and employees with acquisition and the potential CPO process.

Recommendation: The potential negative impacts on affected employees can be mitigated by providing support to businesses to enable successful relocation through the Land Assembly and Relocation Strategy as well the development of a Skills, Education and Employment Plan (SEE Plan) which identifies employment opportunities for those affected by the CPO. In addition, any employment opportunities created through the regeneration should be accessible to all and promoted through a variety of channels to attract a diverse workforce.

7.3.2 Wider regeneration impacts

New employment and training opportunities during construction

The Proposed Regeneration brings with it the opportunity for new employment and training opportunities including construction-related jobs. Construction employment opportunities could cover entry-level jobs, skilled trades and technical and specialised roles.

The groups who benefit from this new employment may vary considerably depending on the type of jobs and training available. Equality effects may arise where training or employment is not available to groups with protected characteristics, for example if jobs require high skill/ education levels which made it harder for some groups to access the opportunities. However, the area has high levels of unemployment and low levels of educational attainment and as such there is potential for those seeking work to benefit from new employment opportunity this includes those groups who are overrepresented in local unemployment figures for example younger people and those from ethnic minority backgrounds, particularly young black people.¹⁰⁵

The allocation of employment opportunities during construction should be informed by the equality priorities outlined in **Table 3-1** for OPDC and the surrounding Boroughs of Brent, Ealing and Hammersmith and Fulham.

Procurement policies should include employment targets including local people affected by the regeneration plans and construction and underrepresented groups including minority ethnic groups and young people.

The area is in one of the top 10% most deprived for deprivation in regard to employment and income with over 80% of the Lower Super Output Areas (LSOAs)¹⁰⁶ in the area being in the top 10% most

¹⁰⁴ OPDC (2025). OPDC Board Meeting Minutes: Appendix 2 OPDC Land Assembly and Relocation Strategy. Available at: [\(Public Pack\)Agenda Document for OPDC Board, 05/02/2025 14:00](#) [accessed 20/05/25].

¹⁰⁵ ONS (2022). Annual Population Survey: Unemployment. Available at: [Unemployment - GOV.UK Ethnicity facts and figures \(ethnicity-facts-figures.service.gov.uk\)](#)

¹⁰⁶ ONS (2023) Lower layer Super Output Areas (LSOAs) are made up of groups of Output Areas (OAs), usually four or five. They comprise between 400 and 1,200 households and have a usually resident population between 1,000 and 3,000 persons. Available at: [Area type definitions Census 2021 - Office for National Statistics](#)

deprived nationally overall. The opportunities created through a large-scale regeneration project can help to train upskill local people and support employment opportunities in the longer term.

Groups that are overrepresented in unemployment figures locally include young people and especially those from Black ethnic groups. A focus on training and upskilling these groups may help to reduce unemployment in the future.

Recommendations: A plan/ strategy to address skills, employment and education issues should be developed by OPDC working with local partners (Job Centre/developers etc.) to enable existing employees and local people to benefit from job opportunities arising through the regeneration works.

For instance, an assessment of surrounding construction training facilities against the programme of works and considering equality of opportunity could be undertaken to determine the demand for a standalone Construction Skills Centre in North Acton led by Ealing Council and supported by OPDC.

Local schools and colleges should be identified within the SEE Plan to provide a platform for career days, talks, and apprenticeship programs that could offer students practical insights into various career paths within the construction industry and contribute social value through fulfilling multiple job and apprentice opportunities with local residents. This would require a commitment from OPDC to consult and engage with the local community, including with local schools and education providers, to inform residents and promote skills and employment opportunities. This opportunity not only benefits students by broadening their career prospects but also strengthens the relationship between the construction project and the local community, promoting inclusivity and long-term positive impacts.

A Responsible Procurement Plan should also be developed to ensure that developers and contractors commissioned by OPDC are adhering to OPDC employment policies and that local residents are given priority for construction jobs and training, where appropriate.

New employment opportunities in the new commercial space

The Proposed Regeneration brings with it the opportunity for new employment, including jobs in commercial space on site covering a range of sectors and skill levels. Young people and those from Black African and Black Caribbean ethnic groups who disproportionately experience higher rates of unemployment may have the potential to benefit from these opportunities.¹⁰⁷

The groups who benefit from this new employment may vary considerably depending on the type of business and associated training. Equality effects may arise where employment or training is not available to groups with protected characteristics, for example where procurement, including recruitment policies, make it harder for some groups to access the opportunities.

7.4 Neighbourhood and community

7.4.1 Direct impacts of the CPO

Loss of commercial services for local customers due to closure of businesses

The loss of existing businesses providing goods and services at the existing site is expected to affect customers and users of services.

In the primary research, almost half of the businesses who responded (46.7%) stated that most of their customers are from the local community. While this does not represent all of the affected businesses, it highlights the potential for customers to experience a change in businesses available to the local community. Equality effects may be experienced when there are patterns in terms of affected customers and their protected characteristics. According to primary research findings, 40% of businesses feel that their business provides goods or services that serve the needs of people from a shared ethnic background and 33% with a shared religious identity. The effects on this ethnic group may include changes associated with a sense of belonging and cultural connections. The loss of

¹⁰⁷ ONS (2022). Annual Population Survey: Unemployment. Available at: [Unemployment - GOV.UK Ethnicity facts and figures \(ethnicity-facts-figures.service.gov.uk\)](https://ethnicity-facts-figures.service.gov.uk)

these facilities could have an adverse impact in cases where the service is not relocated nearby or where there is no nearby alternative.

However, there are some businesses that are not open directly to customers and operate as warehouses or offices that are expected to generate negligible impacts for local customers as a result of relocation.

Many respondents to the primary research felt that the positives of the regeneration would be the addition of new commercial services in the area including retail and leisure opportunities. The new commercial provision is likely to result in increased number of businesses for locals to choose from as well as customers who want to shop and visit the area, therefore benefitting existing businesses and providing better facilities for customers.

The Land Assembly and Relocation Strategy¹⁰⁸ outlines that OPDC will prioritise the retention of local businesses and jobs within its area or the wider West London region. Further, OPDC has published the Old Oak Regeneration Strategy and Illustrative Masterplan that outline the six regeneration proposals and spatial principles based on feedback received during previous rounds of public consultation.

Recommendations: Continued and effective engagement with the local community, including through public consultation on the Illustrative Masterplan, should assist in identifying the needs of residents in terms of goods and services.

Preservation of existing social space

To facilitate the Proposed Regeneration, OPDC may need to acquire the freehold for a business interest which currently provides a social space used by a particular ethnic minority group. OPDC plan to retain this social space within Old Oak as part of the regeneration and support the business owner in unlocking positive impacts of the Proposed Regeneration.

As a result, OPDC are actively seeking engagement with the business owner regarding the potential acquisition of the property prior to making the CPO. At this stage, the extent of this direct impact is unknown and will be monitored going forward.

Recommendation: It is recommended that OPDC continue to seek engagement with the business owner directly to understand the needs of this social space in the future regeneration and agree terms of acquisition that allow continued use of the service by the ethnic minority group that it currently serves.

7.4.2 Indirect impacts

Loss of community centre serving the Muslim community

OPDC requires a commercial property interest currently being used as a community centre to facilitate the Proposed Regeneration. As of August 2025, OPDC has agreed terms with the freeholder and acquired the property. OPDC offered assistance to find an alternative site for the community centre. However, the offer of relocation assistance has been declined and instead, the owners have agreed to lease back the interest until the time at which it is required for regeneration.

The community centre is not a place of worship but provides services for the Muslim community. For example, Eid celebrations and other religious services such as weddings have been held at the premises upon request. The community centre is operated by a social enterprise that advertises the provision of health and educational services such as a segregated gym, steam and sauna rooms, as well as a creche for childcare while parents use the facilities. The centre also advertises educational courses for children including Quran memorisation and Halaqa classes. Therefore, the loss of the community centre could disproportionately negatively impact on members of the Muslim community who are highly represented in the area.

Recommendation: It is acknowledged that the Proposed Regeneration will provide space for a range of new community facilities and aims to be inclusive and meet the needs of people living in Old Oak.

¹⁰⁸ OPDC (2025). OPDC Board Meeting Minutes: Appendix 2 OPDC Land Assembly and Relocation Strategy. Available at: [\(Public Pack\)Agenda Document for OPDC Board, 05/02/2025 14:00](#) [accessed 20/05/25].

OPDC will continue to engage the local community to identify needs and priorities for the regeneration of the area. This should include targeted engagement with users of the community centre to understand how they use current services and how their needs can be met within new community facilities as part of the wider regeneration proposals.

7.4.3 Wider regeneration impacts

Community engagement and participation

Equality legislation emphasises the importance of supporting positive relations between different groups, whilst local community cohesion policy supports group interaction, fair treatment, equal opportunity, and a sense of common belonging, including empowering local communities to shape decisions affecting their lives.

Old Oak is an area of deprivation and among the top 10% most deprived nationally, creating a range of community needs. The extent to which benefits of the Proposed Regeneration will be shared amongst all members of the community, including groups with protected characteristics, will depend in part on engagement efforts to include their views in the planning process.

OPDC has published a Regeneration Strategy¹⁰⁹ outlining the official regeneration offer for Old Oak. This Strategy has been shaped and informed by consultation undertaken to date. Local drop-in events have been hosted at Oaklands Rise on the 22nd August and 19th September 2024 to provide more information and visuals to showcase the emerging regeneration principles and demonstrate how feedback from engagement to date is shaping the plans. To advertise these drop-ins and the Proposed Regeneration more widely, OPDC published an Old Oak Community Newsletter in August 2024 outlining the regeneration area, key facts and emerging principles for re-imagining Old Oak. The Regeneration Strategy and Ideas Book – where local artists create illustrations of what Old Oak may look like in the future – were identified as future commitments to be published at a launch event for the local community.

OPDC has also published an Illustrative Masterplan outlining the spatial principles for Old Oak. Stakeholder and public consultation on the Illustrative Masterplan took place from 17th-22nd May 2025 in the form of local drop-in sessions and an online event.¹¹⁰

Throughout the regeneration process continuous and effective engagement and consultation will need to be undertaken with affected parties and local residents. Young people, ethnic minority groups and those from the LGBTQ+ community can often face barriers to taking part in engagement processes effectively and therefore may be underrepresented in such activities.

Recommendation: Community engagement should be ongoing and may benefit from the establishment of a local Community Forum or Working Group as a collaborative platform where community members come together to discuss, plan and address local needs and issues. This could include group specific meetings or events to encourage those from underrepresented groups or those with particular needs such as young people and / or older people.

Provision of new urban centre with new facilities and services

The Proposed Regeneration aims to deliver a new urban district in Old Oak, including a new high street with shops, cafes, restaurants and local services and amenities such as a new leisure centre, health centre and primary school. This will likely benefit existing and new businesses and residents in the area, as well as the local and wider community should the new facilities serve the community more appropriately than the existing provision of facilities. The extent to which these benefits are shared by those with protected characteristics will depend on the mix of type and usage of shops, businesses, and facilities on offer.

The Proposed Regeneration is expected to provide space for businesses - and local business could potentially benefit from this by being able to upgrade and modernise their business space, especially where specialist equipment and fit out may be required.

¹⁰⁹ OPDC (2025). OPDC Regeneration Strategy. Available at: [OPDC Regeneration Strategy | London City Hall](#) [accessed 20/05/25].

¹¹⁰ OPDC (2025). Old Oak: Illustrative Masterplan. Available at: [Old Oak | OPDC have your say](#) [accessed 20/05/25].

Currently, residents expressed through the primary research undertaken for this study that Old Oak has a low provision of services, including good schools, transport links to schools and no shops within walking distance. Some respondents, especially younger people expressed concern that there is not much to do in the local area because there are limited social activities and venues available, in particular a lack of social meeting places such as pubs and restaurants.

Businesses also commented that the local area feels secluded with no passing trade for businesses. The majority of businesses and residents were supportive of the provision of new services and amenities, especially shops, schools, cafes and restaurants. Respondents felt that the Proposed Regeneration would improve the quality of the area and Old Oak could begin feeling like a 'proper neighbourhood'. For businesses, regeneration could increase footfall and expand customer bases, while children and young people could experience enhanced equality of opportunity through the provision of a new primary school, transport links and parks to socialise. Primary research also highlighted that Old Oak may become more social and integrated, which could particularly benefit elderly or disabled residents and visitors who are more vulnerable to social isolation.

Wider health and wellbeing services, such as GP surgeries, dentists and medical care should be provided in proportion to the projected population of the new site or provision made for the expansion of existing services. Primary research findings revealed concerns amongst residents that infrastructure and services established through the regeneration would not meet the demand of the new population and the growing community would 'outgrow' the new amenities. Therefore, careful consideration and planning for the projected population should be undertaken to ensure new services and amenities can meet demand. This may include working alongside health and wellbeing boards/management to ensure an adequate distribution of services.

Recommendation: It is recommended that the implementation of the Regeneration Strategy has regard to the recommendations in this EqlA and that it should draw upon the evidence of direct and indirect impacts identified within this report.

7.5 Health and wellbeing

7.5.1 Direct impacts of the CPO

Uncertainty and anxiety for existing businesses and residents

The use of compulsory purchase powers to acquire properties and require existing businesses and residents to seek new accommodation could impact the mental health and wellbeing of affected parties.

Primary research undertaken for this EqlA highlighted anxieties and concerns with regard to the Proposed Regeneration including uncertainty over regeneration plan. Directly affected business interests expressed concern about the viability of their business as a result of relocation, including relocation costs and loss of customers. The findings also revealed that the majority of business tenants have resided in the area for over 10 years, therefore felt well-established within the local area. The process of finding alternative commercial units and relocating may be stressful and impact individuals' mental health and wellbeing, especially where businesses may require specialist equipment or interior layouts in order to operate that makes relocating challenging.

Primary research undertaken for this EqlA further identified that directly affected residents felt anxiety around moving their lives elsewhere and losing their homes, especially amongst owner occupiers and private renters. For these longer-term tenants, moving to a new area could result in major adjustment and result in some uncertainty. Residents may also experience difficulty finding a new home that meets their needs, especially if the household is comprised of dependent children, elderly or disabled people.

However, the primary research for this EqlA revealed that the majority of residents have resided in the local area for up to 2 years. These short-term tenancies are mostly held by temporary accommodation tenants directly impacted by the CPO. It is understood from primary research undertaken for this EqlA that these residents already experience stressors associated with their living conditions and circumstances. These may be heightened by the uncertainty of their relocation.

Equality legislation emphasises the importance of supporting positive relations between different groups, whilst promoting community cohesion that supports group interaction, fair treatment, equal opportunity, and a sense of common belonging, including empowering local communities to shape decisions affecting their lives. Throughout any CPO process continuous engagement and consultation would need to be undertaken with affected parties.

Currently, OPDC is negotiating with freeholders and leaseholders of affected properties. Where properties have been acquired with existing tenancies, OPDC has been in contact with the tenants to introduce themselves as the landlord. Where businesses have a protected use or have requested the support of OPDC in relocation, OPDC is engaging with the party directly to identify alternative commercial space.

Recommendation: In order to minimise the potential mental health and wellbeing impacts experienced by affected interests, OPDC should continue active engagement and proactively offering appropriate support to tenants with any housing or commercial issues. This should include adhering to Relocation Strategies and ensuring the appointment of independent advisors, including the Residents Friends and Business Engagement Officers.

Potential loss of visitor's car parking spaces

To facilitate the Proposed Regeneration, OPDC intends to acquire a small extent of the car park currently serving the Shaftesbury Gardens residential estate.

As of September 2025, the area of the car park that may be subject to compulsory purchase comprises spaces for visitor parking. Equality effects may arise where elderly residents, disabled residents or those with a long-term health condition rely on visitors to provide health care services, such as support and care workers. These potential equality impacts may be exacerbated by the minimal and restricted parking available in the surrounding area and may result in longer distances between available car parking spaces and the Shaftesbury Garden residence being visited.

Recommendation: It is recommended that OPDC seek to engage with the residents of Shaftesbury Gardens to understand the usage of these visitor parking spaces and the potential impact of removing these. OPDC may also explore the potential for alternative parking arrangement for those affected.

7.5.2 Wider regeneration impacts

Net increase in accessible open and green space

The spatial vision within the Old Oak West Supplementary Planning Document is for a network of green, accessible and healthy streets and parks that provide a place for people to meet and interact.¹¹¹ The Proposed Regeneration plans to deliver an improved public realm including parks and green space, and high-quality publicly accessible space. The high-level plans for the Proposed Regeneration include up to 20 acres of high-quality publicly accessible open space and 6 acres of parks and green space. These enhancements will provide a net increase in green and open space for local residents. There is widespread recognition of the positive association between physical and mental health (both self-reported and objectively measured) and living environments that are greener or comprise more open space.¹¹² In particular, access to open spaces in urban environments is highlighted as having positive wellbeing effects for older people and people experiencing disabilities through increasing opportunities for social interaction.¹¹³ Primary research for this study further highlighted residents views that increased open space and a more social local environment would improve the area of Old Oak through regeneration.

There are also plans for the Proposed Regeneration to promote and increase active travel networks which in turn could result in more journeys by walking and cycling in the area, resulting in increasing levels of physical activity and cleaner air. These are benefits that can be shared by protected groups who are more vulnerable to poor health through lack of physical activity.

¹¹¹ OPDC (2024). Old Oak West Supplementary Planning Document. Available at: [Old Oak West SPD Part1 \(14\).pdf](#)

¹¹² Public Health England (2020) Improving access to greenspace. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/904439/Improving_access_to_greenspace_2020_review.pdf

¹¹³ Xu, T. (2022) Urban Green Space and Subjective Well-Being of Older People: A Systematic Literature Review. Available at: <https://www.mdpi.com/1660-4601/19/21/14227>

Equality impacts may arise where users are more sensitive to urban and public realm design, due to protected characteristics, in particular disabled people who have certain accessibility and mobility requirements. Public spaces often lack features such as ramps, tactile paving and accessible restrooms which make navigating the area challenging for people with mobility impairments. Inaccessible design limits the independence and participation of these individuals in everyday activities, which may perpetuate social exclusion. These equality effects may also be felt by elderly people and those with young families and pushchairs. Therefore, designing inclusive public spaces fosters a more equitable and welcoming environment for everyone.

OPDC also intend to acquire the Birchwood Nature Reserve, which comprises currently inaccessible open space with the purpose of improving it and reopening it to the public.

Recommendation: In order to create a more inclusive process, OPDC could implement a Community Engagement Plan that involves local and prospective residents in the planning and design of the new landscaping spaces. Such a Plan could include workshops and feedback sessions to ensure that the spaces meet the specific needs and preferences of the community.

Recommendation: To provide a consistent approach to accessing public space, inclusive design principles should be identified from the start of the design process. These principles need to accommodate the diverse needs of all individuals, particularly those with disabilities. Effective consultation and engagement with the key user groups identified above could highlight lived experience and inform the development of these principles in practice.

Provision of enhanced Canalside

The Proposed Regeneration aims to enhance 1km of the Grand Union Canal and its towpath to improve the walking, cycling and boating links to central London and the Midlands. This is expected to create a vibrant, accessible, and inclusive public space that supports both community wellbeing and environmental sustainability.

This regeneration objective will likely benefit recreational users through a more accessible and attractive public realm, particularly for walkers and cyclists. Primary research for this study highlighted residents' views that canal enhancements alongside accessible open space provision would improve the area of Old Oak and create a more social environment through regeneration.

As a key stakeholder, the Canal and River Trust engaged in consultation for this study in October 2024, sharing knowledge of accessibility requirements and design considerations pertinent to the Canalside. The Canal and River Trust are also a statutory consultee for future planning applications relating to Old Oak, therefore OPDC and the Canal and River Trust have also collaborated to produce a Placemaking Study for the Grand Union Canal to facilitate coordinated vision and strategy to support the creation of an active canal community.

Recommendation: It is recommended that OPDC undertake further stakeholder and public consultation to understand the groups potentially affected by this wider regeneration impact and the accessibility needs of these users, such as those living and holidaying on the Canal as well as recreational users and commuters who use the Canalside as part of their onward journey.

Construction related environmental impacts

The construction works associated with the Proposed Regeneration are likely to result in environmental impacts such as noise, vibration and dust from demolition and construction activities.

This will negatively affect most if not all residents in the immediate area. Some residents could be more sensitive to these construction effects than others. For example, those who spend more time at home will be subjected to longer periods of adverse noise impacts including older people, people with disabilities and long-term limiting illnesses and pregnant women/ women on maternity leave or those caring for small children. Some groups with protected characteristics also have differential sensitivity to noise. For example, people with dementia have an increased sensitivity to noise and light.¹¹⁴ Children are also vulnerable to increased noise levels in some instances, particularly those with a

¹¹⁴ Social Care Institute for Excellence (2023). Dementia Friendly Environments. Available at: [Dementia - SCIE](#)

cognitive impairment. Autistic children can be particularly sensitive to their environment and, in some cases, can be extremely distressed by loud noise.

There is a tendency for people belonging to protected characteristic groups to experience poorer health. In the case of poor air quality, as a result of construction-related emissions including dust, children, older people, disabled people and pregnant women are more vulnerable to adverse health effects.¹¹⁵ Especially in the case of disabled people, those with weak respiratory systems, or suffering from health problems more generally associated with weaker lungs, may be disproportionately impacted by emissions and dust created through construction and maintenance activities. Pregnant women are more vulnerable to the adverse effects of air pollution including an increasing risk of miscarriage as well premature births and low birth weights.

Primary research undertaken to inform this EqlA highlighted the cumulative construction impacts felt by residents as a result of the ongoing HS2 works in Old Oak. When businesses and residents, both directly and indirectly affected by the Proposed Regeneration, were asked to name the disadvantages are about working and living in the area, themes of construction disruption, noise and dust were frequently mentioned.

Residents that remain in the area while regeneration is undertaken are likely to have experienced disproportionate levels of construction impacts over an extended period. Primary research highlighted while residents felt the Proposed Regeneration would be positive in the long-term, in the short-term construction would be disruptive. There is a desire amongst residents for construction to be effectively managed and take place in a short time frame.

Recommendations: Construction and environmental management plans should be implemented throughout the construction phase of the Proposed Regeneration. However, due to the cumulative impact of the numerous construction activities in the area it is recommended that the plans should be particularly thorough and consider the findings of this EqlA to help minimise the impacts on specific vulnerable groups. This includes developing a deeper understanding of the specific issues faced by local residents, active engagement with local residents with health issues and frequent monitoring of issues within the Old Oak area. Appointed contractors should also be required to be members of the Considerate Constructors Scheme.¹¹⁶ The scheme is designed to encourage best practice beyond statutory requirements with contractors required to follow the Scheme's Code of Considerate Practice including the three areas of Respect the Community, Care for the Environment and Value their Workforce.

Safety and security related impacts during construction

The Proposed Regeneration will cover a large area with the construction phase lasting for numerous years. During this time some residents will be living in the area whilst the demolition and construction takes place.

The construction related with the Proposed Regeneration could result in safety and security issues for those who are more vulnerable to safety and security issues including children, women (including pregnant women), older people, people with disabilities, young people, ethnic minority groups and people from the LGBT community. There is a need to balance safety and security with accessibility needs during construction. It is important to ensure that the direct and indirect risks of physical danger associated with construction are minimised.

This may include avoiding the creation of secluded or isolated areas through construction hoardings and footpath diversions that could have an adverse impact on those with mobility issues, in particular older people, disabled people, pregnant women and people with pushchairs.

Further to these safety and security concerns, the primary research carried out indicated that the presence of construction workers has left some residents feeling unsafe or intimidated especially

¹¹⁵ Halonen, J (2015). Road traffic noise is associated with increased cardiovascular morbidity and mortality and all-cause mortality in London. Available at: [Road traffic noise is associated with increased cardiovascular morbidity and mortality and all-cause mortality in London | European Heart Journal | Oxford Academic \(oup.com\)](#); Hjortebjerg, D., Anderson, A.M., Christensen, J.S., Ketzel, M., RaaschouNielsen, O., Sunyer, J., Julvez, J., Fors, J. and Sorensen, M. (2015) 'Exposure to Road Traffic Noise and Behavioral Problems in 7-Year-Old Children: A Cohort Study' Environmental Health Perspectives, 124(2): 228-34; and Leiser, C, Hanson, H, Sawyer, K, Steenblik, J, Al-Dulaimi, R, Madsen, T, Gibbins, K, Hotaling, J, Oluseye Ibrahim, Y, VanDerslice, J & Fuller, M (2019) Acute effects of air pollutants on spontaneous pregnancy loss: a case crossover study, Fertility and Sterility, Volume 111, Issue 2, 2019, Pages 341- 347.

¹¹⁶ Considerate Constructors Scheme (2024). Improving Construction. Available at: [Considerate Constructors Scheme](#)

when using public spaces such as local parks. Some protected characteristic groups are more vulnerable to experiencing harassment and discrimination in wider society, and therefore disproportionately impacted by the potential for construction activities to increase this.

By contrast, the long term improvements to the public realm are expected disproportionately to benefit those same vulnerable groups with accessible, well lit, easy to navigate public realms.

Recommendation: A Construction and Environmental Management Plan (CEMP) should outline appropriate management and mitigation of safety and security risks associated with construction alongside a best practice Code of Construction being put in place and followed by an appointed contractor, considering the needs of those with protected characteristics and reflecting any disproportionate impacts.

This may include key walking routes and crossing points in the area being maintained or appropriately diverted where possible and CCTV or manned security provided where natural surveillance has been limited. Awareness and education as to the dangers of playing on construction sites could also be provided in local schools and community centres to discourage children from entering construction areas.

7.6 Transport and connectivity

7.6.1 Wider regeneration impacts

Traffic impacts during construction

During the construction of the Proposed Regeneration, construction related traffic could result in adverse safety impacts for local residents and visitors. Some residents would be more sensitive to the effects of these construction impacts than others, in particular children and young people. Adverse health effects may also be generated through traffic-related noise. In particular, this may also increase health risks for older people¹¹⁷ and lowers health-related quality of life in children.¹¹⁸

Primary research undertaken for this EqlA also highlighted concerns about cumulative traffic impacts of the ongoing HS2 construction works through perceptions of increased congestion, traffic and noise associated with another period of construction. Residents in particular stressed the importance of any future construction road works being organised and well managed in light of the congestion and elongated journeys resulting from HS2 related diversions, road closures and road works. Some residents expressed disproportionate impacts on those with long-term health problems and disabilities in terms of being delayed or unable to access health services regularly, as well as delays for young children travelling to school.

Construction activities and associated road works, including road closures and diversions, may also cause disruption to daily journeys made by public transport, in particular buses. Bus routes may be diverted and could require passenger to travel further distances to bus stops and experience longer journey times. Some people with protected characteristics rely more heavily on public transport, such as young people to access education, public services, economic opportunities and social activities and older people to access services such as shops, post offices, healthcare centres and visiting friends and relatives. Any changes in journey routes should be promptly and clearly communicated to passengers to minimise further disruption to their journey and allow time for journey planning to prevent delay.

Recommendation: In order to minimise the potential cumulative traffic impacts associated with construction, OPDC and the appointed contractor(s) should develop a Construction and Environment Management Plan and associated traffic management plans for the Proposed Regeneration which should include a range of measures to mitigate and control environmental and traffic-related issues, such as working hours, communicating road closures/ diversions and working with residents to phase works to minimise construction effects.

¹¹⁷ Halonen, J. et al (2015). Road Traffic noise is associated with increased cardiovascular morbidity and mortality in London. *European Heart Journal*. 36(39), 2653-2661. Available at: [Road traffic noise is associated with increased cardiovascular morbidity and mortality and all-cause mortality in London | European Heart Journal | Oxford Academic](#)

¹¹⁸ Hjortebjerg, D. et al (2016). Exposure to road traffic noise and behavioural problems in 7-year-old children: a cohort study. *Environmental health perspectives*, 124(2), 228-234. Available at: [\(PDF\) Exposure to Road Traffic Noise and Behavioral Problems in 7-Year-Old Children: A Cohort Study](#)

Improved public transport and active travel networks

The spatial vision within the Old Oak West Supplementary Planning Document includes neighbourhoods within close proximity of new and improved public transport and active travel networks that support sustainable travel and well-being.¹¹⁹ The future Old Oak Common Station will improve connectivity to key destinations across London via the Elizabeth Line and outside London via HS2. Access will also be integrated into the existing transport network including North Acton Underground and Willesden Junction Station.

The Proposed Regeneration is expected to enhance equality of opportunity for the local community, especially those who may be commuting to central London for work or more heavily rely on public transport. In particular, young people are more likely to rely on public transport to access education, public services, economic opportunities and social activities. Older and disabled people may also rely on public transport to access services such as shops, post offices, healthcare centres and visiting friends and relatives.⁴¹

The primary research for this study showed that respondents liked living and working in Old Oak, due to the close proximity to public transport connections, particularly Underground and Overground services and the associated connectivity to central London and local areas. Public transport connections are heavily relied upon by existing businesses and residents and there is a need for these to be maintained and enhanced.

Further, planned improvements to the active travel network could provide a variety of travel choices for people to reach their destination and support physical and mental health benefits for the local community. Well-designed streets can help to promote walking and healthier active transport modes such as wheeling and cycling. Disabled and elderly people are likely to particularly benefit from inclusive access improvements, enabling them to share the physical and mental health benefits of the overall regeneration, as well as underrepresented groups in active travel such as women and ethnic minority groups.¹²⁰ Many protected characteristic groups are less likely to have access to a car or have the ability to drive and are therefore more dependent on walking and cycling for their journeys. Improvements to transport infrastructure that make walking and cycling journeys easier, safer and more accessible are likely to have benefits for these groups through improved journeys.

OPDC is in the process of drafting a Public Realm and Green Infrastructure (PRGI) SPD¹²¹ that would set out the proposed street hierarchy, including walking and cycling routes, alongside the approach to inclusive design and implementing active travel routes. Provided that the proposals are developed in accordance with the principles of this SPD once adopted, this could enable the delivery of a highly connected and efficient transport network that enhances local transport accessibility and informs these ambitions in the Proposed Regeneration.

Recommendations: Considerations for the active travel and public transport needs of protected groups such as disabled people should be included within Inclusive Design Principles for the regeneration.

OPDC should also draw on guidance from TfL in the development of regeneration proposals for the transport network.

7.7 Summary of potential equality impacts

Table 7-1 provides a summary of the potential direct impacts of the CPO, indirect impacts of land and property acquisition and the wider regeneration effects. This describes an overview of each impact, key protected characteristic groups potentially affected and details of planned or recommended mitigation/actions to support the enhancement of positive effects and minimising of negative effects.

An update of progress towards the proposed mitigations and further recommendations as of September 2025 has been included.

¹¹⁹ OPDC (2024). Old Oak West Supplementary Planning Document. Available at: [Old Oak West SPD Part1 \(14\).pdf](#)

¹²⁰ Sustrans (2018) Women in UK cities have a positive perception of cycling, yet 73% never ride a bike. Available at: [Women in UK cities have a positive perception of cycling, yet 73% never ride a bike - Sustrans.org.uk](#); Sustrans (2020). New report shows large unmet demand for cycling from ethnic minority and disadvantaged groups. Available at: [New report shows large unmet demand for cycling from ethnic minority and disadvantaged groups - Sustrans.org.uk](#)

¹²¹ OPDC (2024). Draft Public Realm and Green Infrastructure SPD. Available at: [Draft Public Realm and Green Infrastructure SPD | OPDC have your say](#)

Table 7-1: Summary of Potential Impacts

Impacts of CPO	Potentially affected protected characteristic groups												Overview of potential effects/ outcomes	Planned mitigation/ Further recommendations	Update (September 2025)
	Age			Sex	Race -ethnic minority groups	Religion	Disability	Transgender	Sexual Orientation	Pregnancy/ Maternity	Socio-economically disadvantaged groups	Other group (homeless, asylum seekers etc)			
	Children	Young People	Older People												
Housing: Direct Impacts															
Loss of homes for owner occupiers (Negative impact)	x		x		x		x			x	x		The loss of home could disproportionately impact the one known owner-occupier , who may struggle to find equivalent homes locally. Affected groups may lose important social ties and informal and formal support networks.	Planned mitigation: CPO Compensation Code for eligible owner occupiers acquired pursuant to the CPO. Further recommendations: Resident Relocation Strategy and Independent Residential Advisor.	Planned mitigation: Land Assembly and Relocation Strategy outlining CPO compensation code. Appointment of a Resident Friend providing independent advice to owner occupiers. Further recommendations: Adherence to the CPO compensation code and development of Residential Occupier and Engagement Strategy.
Loss of homes for private renters (Negative impact)	x	x	x				x			x	x		The loss of approximately 18 privately rented properties may impact upon groups with protected characteristics in particular as they lose vital social and community ties and rely heavily on local services and amenities. Tenants may incur unexpected relocation costs, which could disproportionately impact low-income and disabled individuals.	Planned mitigation: CPO Compensation Code for eligible private renters acquired pursuant to the CPO. Further recommendations: Resident Relocation Strategy and Residential Advisor.	Planned mitigation: Land Assembly and Relocation Strategy outlining CPO compensation code. Appointment of a Resident Friend providing independent advice to private renters. Further recommendations: Adherence to the CPO compensation code and development of Residential Occupier and Engagement Strategy.
Loss of temporary accommodation (Negative impact)	x	x	x		x	x	x			x	x	x	CPO process could result in potential displacement of 21 temporary housing units provided by LBHF that supports socio-economically disadvantaged individuals and those at risk of homelessness.	Further recommendations: Resident Relocation Strategy and Independent Residential Advisor.	Planned mitigation: OPDC engaging closely with LBHF and agreed terms for a licence pending development. LBHF have a duty to relocate tenants. Further recommendations: Support LBHF to prevent homelessness and provide clear and accessible communication with occupiers regarding their rights following acquisition. Appointment of specialist Resident Friend.

Impacts of CPO	Potentially affected protected characteristic groups												Overview of potential effects/ outcomes	Planned mitigation/ Further recommendations	Update (September 2025)	
	Age			Sex	Race -ethnic minority groups	Religion	Disability	Transgender	Sexual Orientation	Pregnancy/ Maternity	Socio-economically disadvantaged groups	Other group (homeless, asylum seekers etc)				
	Children	Young People	Older People													
Loss of homes for Housing Association residents (Negative impact)	x	x	x		x		x				x	x		CPO may displace two known social housing properties and reduce the availability of homes for social rent, disproportionately affecting low-income tenants, including families, older people, and disabled individuals, who may face challenges in relocating due to limited housing options, support needs, and disruption to local networks and benefits.		Further recommendations: Continue to engage with the Housing Associations and tenants to identify needs and supportive measures for relocation. OPDC must adhere to the CPO compensation code for eligible Housing Association tenants.
Housing: Wider Regeneration Impacts																
Net increase in housing provision in Old Oak (Positive impact)	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	Unlocking up to 9,000 new homes wider choice of homes catering to the diverse needs of local residents, especially those whose current accommodation may not meet their requirements.	Planned mitigation: Regeneration Strategy. Commitments to wide range of housing types including affordable housing. Safeguarding of Bashley Road Gypsy Traveller site. ¹²² Further recommendations: Local Lettings Plan and Direct Market Sales.	Planned mitigation: Publication of Regeneration Strategy outlining commitment to deliver a mixture of housing types and tenures.
Potential increase in house prices and rent costs (Negative impact)		x	x				x					x		Property and rental prices may increase as Old Oak is transformed into a new urban district with new homes, commercial spaces and public amenities. Higher rents and living costs across the affected groups could lead to residents being priced out the area.	Planned mitigation: Commitments to affordable housing. ¹²³ Further recommendations: Local Lettings Plan and consideration of priority for local people.	Planned mitigation: Regeneration Strategy highlights commitment to delivering new and affordable homes to rent or buy and maximise affordability within Old Oak.
Changes to the urban landscape (Negative impact)			x				x				x			Regeneration may cause loss of light and privacy for neighbouring properties due to a change in the urban landscape and increased heights in buildings, disproportionately affecting individuals who spend more time at home e.g. older people.	Planned mitigation: Daylight/Sunlight assessment.	This is a further recommendation for scheme development following the making of the order.

¹²² OPDC (2022) OPDC Local Plan 2018 to 2038. Available at: [opdc local plan 2022 june 2022 including appendix 0.pdf \(london.gov.uk\)](#)

¹²³ OPDC (2024). Old Oak West Supplementary Planning Document. Available at: [Old Oak West Supplementary Planning Document \(SPD\) | London City Hall](#)

Impacts of CPO	Potentially affected protected characteristic groups												Overview of potential effects/ outcomes	Planned mitigation/ Further recommendations	Update (September 2025)	
	Age			Sex	Race -ethnic minority groups	Religion	Disability	Transgender	Sexual Orientation	Pregnancy/ Maternity	Socio-economically disadvantaged groups	Other group (homeless, asylum seekers etc)				
	Children	Young People	Older People													
Employment, skills and training: Direct Impacts																
Business closure/ non- viability of business (Negative impact)					x	x						x		The acquisition and potential CPO of approximately 35 businesses could lead to involuntary business closures or relocations due to relocation costs and losing local customer bases, especially for businesses serving specific ethnic groups and smaller independent businesses.	Planned mitigation: CPO Compensation Code for eligible businesses acquired pursuant to the CPO. Further recommendations: Business Relocation Strategy and Independent Business Advisor. Early release of compensation payments.	Planned mitigation: The Land Assembly and Relocation Strategy outlines adherence to the CPO compensation code and appointment of Business Engagement Officers. Considering the early release of compensation payments where required. Further recommendation: OPDC must adhere to the CPO compensation code and implement the Land Assembly and Relocation Strategy.
Temporary or permanent loss of employment following closure or relocation (Negative impact)		x			x							x		Without appropriate or affordable relocation options, the CPO process could lead to business closures and associated job losses disproportionately affecting employees are from ethnic minority backgrounds and family-run businesses.	Planned mitigation: CPO Compensation Code where applicable. Further recommendations: Business Relocation Strategy and Independent Business Advisor. Skills, Employment and Education Plan.	Planned mitigation: The Land Assembly and Relocation Strategy outlines the aim to prioritise retaining local businesses within its area or wider West London region.
Employment, skills and training: Wider Regeneration Impacts																
New employment and training opportunities during construction (Positive impact)		✓		✓	✓		✓					✓		Construction works are anticipated to provide temporary employment and training opportunities which could particularly benefit the affected groups who face higher unemployment rates.	Planned mitigation: Regeneration Strategy. Further recommendations: Skills, Employment and Education Plan. Responsible Procurement Plan.	Planned mitigation: Regeneration Strategy outlining commitment to driving inclusive economic growth within Old Oak.
New employment and learning opportunities in Old Oak as a result of regeneration (Positive impact)		✓		✓	✓		✓							The Proposed Regeneration will create employment opportunities and places for learning which could especially benefit affected groups who face higher unemployment rates as well as children and young people in education.	Planned mitigation: Regeneration Strategy. Further recommendations: Skills, Employment and Education Plan.	Planned mitigation: Regeneration Strategy outlining commitment to driving inclusive economic growth.

Impacts of CPO	Potentially affected protected characteristic groups												Overview of potential effects/ outcomes	Planned mitigation/ Further recommendations	Update (September 2025)	
	Age			Sex	Race -ethnic minority groups	Religion	Disability	Transgender	Sexual Orientation	Pregnancy/ Maternity	Socio-economically disadvantaged groups	Other group (homeless, asylum seekers etc)				
	Children	Young People	Older People													
Neighbourhood and Community: Direct Impacts																
Loss of commercial services due to closure of units (Negative impact)					x	x						x		The loss of existing businesses at the site is expected to impact local customers and service users, especially those from shared ethnic group or religious background and particular trades that require specialist services.	Planned mitigation: CPO Compensation Code for eligible businesses acquired pursuant to the CPO. New retail and commercial facilities on site as part of Proposed Regeneration. Further recommendations: Continued engagement with local community to identify specific needs.	Planned mitigation: The Land Assembly and Relocation Strategy prioritises retaining businesses and jobs within the local area. Further recommendations: Continued engagement with local community to identify specific needs.
Preservation of existing social space (Positive impact)					✓									OPDC may acquire a business freehold that provides social space to a particular ethnic minority group with the plan to retain this space and support the owner in unlocking positive impacts of the Proposed Regeneration.		Planned mitigation: OPDC has sought to engage with the business owner to agree terms of acquisition. Further recommendations: Continue engagement with the business owner to understand the needs of the social space and allow continued use following regeneration.
Neighbourhood and Community: Indirect Impacts																
Loss of community centre serving the Muslim community (Negative impact)					x	x								The loss of a community centre serving the local Muslim community and providing health, educational, and leisure services could negatively impact on the Muslim Community.	Planned mitigation: CPO Compensation Code if acquired pursuant to the CPO. New community facilities on site as part of Proposed Regeneration. Further recommendations: Continued engagement with Community Centre and Muslim community to identify specific needs.	Planned mitigation: As of August 2025, the community centre has been acquired. Further recommendations: Targeted engagement with community centre users as part of wider engagement to identify how needs can be met in regeneration.
Neighbourhood and Community: Wider Regeneration Impacts																
Community engagement and participation (Positive impact)	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	All protected groups can benefit from effective community engagement and consultation. However, some groups are traditionally underrepresented in terms of engagement. This can include children, young people, ethnic minority	Planned mitigation: Community Engagement Strategy Communications Plan. Further recommendations: Establish a local Community Forum or Working Group for community members	Planned mitigation: OPDC has published an Illustrative Masterplan and carried out stakeholder and public consultation in May 2025.

Impacts of CPO	Potentially affected protected characteristic groups												Overview of potential effects/ outcomes	Planned mitigation/ Further recommendations	Update (September 2025)
	Age			Sex	Race -ethnic minority groups	Religion	Disability	Transgender	Sexual Orientation	Pregnancy/ Maternity	Socio-economically disadvantaged groups	Other group (homeless, asylum seekers etc)			
	Children	Young People	Older People												
													groups and those from the LGBTQ+ community.	come to feed into the type of commercial services they want on the site.	
Provision of new urban centre with community facilities and services (Positive impact)	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	Regeneration provides an opportunity for the beneficial operation of businesses and residents alike, with businesses able to modernise their space and new facilities serving the community’s needs. For regeneration to be successful, ongoing consultation with affected parties would be beneficial.	Planned mitigation: Regeneration Strategy. Further recommendations: Establish a local Community Forum or Working Group for community members come to feed into the type of commercial services they want on the site. Consider the reprovision of community services lost through the CPO process, including the community centre.	Planned mitigation: Regeneration Strategy outlining the vision for Old Oak.
Health and Wellbeing: Direct Impacts															
Uncertainty and anxiety for existing businesses and residents (Negative impact)	x	x	x		x		x				x	x	The CPO process could cause anxiety and stress due to the loss of homes, business or employment. This includes the need to find suitable alternative accommodation and relocation. This could disproportionately impact affected protected characteristics who are vulnerable to health issues or face additional challenges such as language barriers or financial issues.	Planned mitigation: CPO Compensation Code for eligible residents and businesses. Consultation and engagement with local community, including affected residents and businesses. Further recommendations: Business and Resident Relocation Strategies and advisors. It is recommended that OPDC provides assistance in finding affordable alternative business units elsewhere and support with the upfront costs of moving such as moving services and making new units fit for purpose.	Planned mitigation: Land Assembly and Relocation Strategy outline adherence to the CPO compensation code and additional compensation and professional support. Further recommendations: Develop Residential Occupier and Engagement Strategy and actively engage with affected interests both directly and via independent advisors. Provide information in alternative language and formats where required.
Potential loss of visitor’s car parking spaces (Negative impact)			x				x				x		To support the Proposed Regeneration, OPDC may compulsorily purchase part of the Shaftesbury Gardens car park comprising visitor spaces. This may disproportionately affect elderly or disabled residents reliant on care visitors, with impacts to be monitored due to limited alternative parking.		Further recommendations: It is advised that OPDC engage with Shaftesbury Gardens residents to assess visitor parking use and explore alternative arrangements for those potentially affected.

Impacts of CPO	Potentially affected protected characteristic groups												Overview of potential effects/ outcomes	Planned mitigation/ Further recommendations	Update (September 2025)	
	Age			Sex	Race -ethnic minority groups	Religion	Disability	Transgender	Sexual Orientation	Pregnancy/ Maternity	Socio-economically disadvantaged groups	Other group (homeless, asylum seekers etc)				
	Children	Young People	Older People													
Health and Wellbeing: Wider Regeneration Impacts																
Net increase in accessible open and green space (Positive impact)	✓	✓	✓				✓				✓	✓		The provision of parks and green space and high-quality publicly accessible space may generate equality impacts where users are more sensitive to design and have certain accessibility requirements. Enhancements could improve the physical and mental health of residents and visitors, in particular groups vulnerable to social isolation.	Planned mitigation: Range of open spaces to be created as part of Proposed Regeneration. Further recommendations: Develop inclusive design principles for a consistent approach to accessing public space, informed by the lived experience of affected groups.	This is a further recommendation for scheme development following the making of the order.
Provision of enhanced Canalside (Positive impact)	✓	✓	✓				✓				✓	✓		The enhancement of Canalside to create an accessible and inclusive public space. Enhancements could improve recreational offer at Old Oak, particularly for walkers and cyclists. The extent of this impact is unknown and will be monitored going forward.		Further recommendations: Undertake further stakeholder and public consultation to understand the groups potentially affected by this regeneration objective.
Construction related environmental impacts (Negative impact)	x	x	x	x			x				x			Construction is expected to cause environmental impacts like noise, vibration, and dust disproportionately affecting those spending more time at home and are sensitive to the adverse health effects of poor air quality or noise. These effects are expected to be cumulative in light of ongoing HS2 construction at the site.	Planned mitigation: Construction and Environmental Management Plan (CEMP) Further recommendations: Continuous engagement with residents is crucial to address specific needs. CEMP 'plus' to include chapter on specific vulnerable groups with mitigations.	This is a further recommendation for scheme development following the making of the order.
Safety and security concerns during construction (Negative impact)	x	x	x	x	x	x	x	x	x	x	x		x	Construction activities may pose safety hazards and security issues for local residents. This may include secluded areas around hoardings, diversions and children playing or travelling near construction sites.	Planned mitigation: The Construction and Environment Management Plan should manage and mitigate safety and security risks and reflect the needs of protected characteristic groups. A best practice Code of Construction should also be implemented. Further recommendations: Inclusive Design Principles Gender Safety Audit	This is a further recommendation for scheme development following the making of the order.

Impacts of CPO	Potentially affected protected characteristic groups												Overview of potential effects/ outcomes	Planned mitigation/ Further recommendations	Update (September 2025)	
	Age			Sex	Race -ethnic minority groups	Religion	Disability	Transgender	Sexual Orientation	Pregnancy/ Maternity	Socio-economically disadvantaged groups	Other group (homeless, asylum seekers etc)				
	Children	Young People	Older People													
Transport and Connectivity: Wider Regeneration Impacts																
Traffic impacts during construction (Negative impact)	x	x	x				x				x			Construction traffic can create disruption and increased journey times to local facilities such as employment, healthcare and education. There are also safety risks for vulnerable road users. The ongoing HS2 construction could create cumulative impacts and the need for well-managed future road works to avoid further disruption.	Planned mitigation: Construction and Environment Management Plan. Further recommendations: Continued engagement with local community to identify specific destinations of importance in the area.	This is a further recommendation for scheme development following the making of the order.
Improved public transport and active travel networks (Positive impact)		✓	✓				✓				✓			Improved public transport is anticipated to enhance equality of opportunity for affected groups that heavily rely on public transport and new active travel networks will generate physical and mental health benefits for the local community. Increased active travel infrastructure could also be beneficial for those without access to a car.	Further recommendations: Consider inclusive design principles in new transport infrastructure, which may include integrating principles from the draft PRGI SPD.	This is a further recommendation for scheme development following the making of the order.

7.8 Regeneration equality outcomes

The evidence gathered for this EqlA and the findings of the assessment have been used to form some initial equality outcomes for the Proposed Regeneration. These outcomes align with the Principles of the Old Oak West Supplementary Planning Document¹²⁴ to enhance equality of opportunity for existing and future residents, businesses and visitors as a result of the Proposed Regeneration.

Table 7-2 sets out the proposed equality outcomes alongside initial actions and considerations. Actions should be monitored and updated frequently.

Table 7-2: Summary of equality outcomes and actions

EqlA theme	Aligned SPD Principles	Equality Outcomes	Actions/Initial considerations
Housing Inclusive and accessible housing for all	HP1 Housing: contribute to the delivery of new homes across Old Oak ranging in tenure, type and size to meet diverse housing needs.	Inclusive and accessible housing for all	Housing mix should be informed by the equality priorities outlined in Table 3-1 , including family-sized homes and affordable housing Housing mix should consider the existing provision of tenures, especially social housing and temporary accommodation Ongoing consultation should be undertaken with housing officers and local residents. Housing should be compliant with local plan and housing standards e.g. lifetime homes
		'Genuinely' affordable housing	Intermediate rent should include a mix of lower rental quartile and London Living rent to help to make it more affordable to local people.

¹²⁴ OPDC (2024). Old Oak West Supplementary Planning Document. Available at: [Old Oak West SPD Part1 \(14\).pdf](#)

EqlA theme	Aligned SPD Principles	Equality Outcomes	Actions/Initial considerations
		New homes for local people and those who are disproportionately represented on social housing waiting lists.	Consider market-based scheme for those who have lived in the area for a long time and are at risk of being priced out of the housing market .
Employment, jobs and skills Deliver employment and training opportunities for all	EP1 Jobs and local access to training, employment and economic opportunities. SP5 A strong, resilient and diverse economy, which allows existing businesses to thrive and grow and supports the introduction of new businesses to the area: a fair economy across the OPDC area will provide opportunities for locals and Londoners to access a range of employment opportunities across a range of sectors and skill levels.	Creation of jobs for those most at risk of unemployment	Developing and monitoring procurement policies with targets for employment of local people and those from underrepresented groups
		Reducing deprivation through increased opportunities to learn and work	Work with the three host boroughs to ensure skills and employment training and business support is available for local residents.
		Spaces for minority owned businesses and social enterprises to thrive	Work with local partner organisations to understand needs Creation of smaller, affordable commercial units as part of the mix of new commercial units
Neighbourhood and community Placemaking to provide safe, clean and accessible facilities for communities	TCCP1 Town centre uses and areas: deliver wide range of town centre and community uses that meet the needs of local people. TCCP2 Social infrastructure and sports facilities: deliver social	A place where people can and want to work, live and socialise. More young people remaining in the area in the long-term.	Engagement with younger people about types of social facilities that are most important Consider social facilities that cater for a wide range of young people.
		An 'age-friendly' community that continues to be home for Old Oak's older long-term residents	Set up community forum for long-term residents to encourage input into regeneration proposals and to support community cohesion.

EqlA theme	Aligned SPD Principles	Equality Outcomes	Actions/Initial considerations
	infrastructure that is high quality, accessible, inclusive and collocated with publicly accessible open spaces to support social interaction.	Community led social infrastructure	Community engagement and participation to identify priorities for different groups of residents. Market research around needs of emerging / future communities ongoing throughout development period.
Health and wellbeing Access to key services and facilities for improved community health and wellbeing	GGP1 Good Growth and Social Value: contribute to delivering Social Value by improving health and wellbeing, fairness and day-to-day quality of life. EUP2 Open spaces locations and design: deliver and/or positively contribute towards a well-designed open space network that provides for the needs of people living, working and visiting Old Oak.	Reduced health inequalities	Inclusive design framework for open spaces to promote use across all groups and particularly to benefit vulnerable groups.
		All community amenities accessible by walking, cycling and public transport	Planning for more community amenities within walking distance of residents to increase opportunities for walking and cycling and reduce need to travel by private car.
Transport and connectivity Deliver equitable access to transport and enhanced connectivity for the local community	TP1-TP6 Transport: including <ul style="list-style-type: none"> • Contribute to safe, inclusive and accessible walking, cycling, bus and street network • New and enhanced connections within OPDC development area • Promote use of the Grand Union Canal for passengers, leisure and freight transport 	Active travel network for all	Using inclusive design principles for active travel network allowing disabled people, and those with trailers and pushchairs to access the travel network Provide and promote schemes for purchasing, hiring, storing and maintaining bicycles. Travel training programme for the area to increase confidence in cycling.

EqIA theme	Aligned SPD Principles	Equality Outcomes	Actions/Initial considerations
	<ul style="list-style-type: none"> • Deliver Old Oak Common Station as an exceptionally designed 21st century station and transport interchange integrated into the wider movement network • Present Willesden Station, North Acton and the potential Old Oak Common Lane Station as improved high-quality stations 	Safe and secure transport network	Use Gender Safety Assessment ¹²⁵ to design and plan infrastructure including use of day and night design.

¹²⁵ A gender safety audit in this context is an assessment of the transport network that identifies the impact of gender on aspects of safety. For example, feelings of anxiety and uncertainty while using the transport network at night amongst women.

8. EqlA Action Plan

Table 8-1 below sets out the EqlA Action Plan that has been developed in collaboration with OPDC. The Action Plan identifies actions to begin to manage and mitigate the potential negative equality effects and opportunities to enhance positive impacts and equality of opportunity identified through the impact assessment.

The EqlA Action Plan is two-fold; it first sets out a series of actions to be undertaken prior to making the potential CPO that reflect the direct impacts discussed in **Chapter 7** and aim to manage and mitigate any negative equality impacts and opportunities to enhance positive impacts and equality of opportunity for residents and/or businesses who may be directly affected by the CPO (**Action 1 and 2**). Further recommendations for scheme development regarding the potential wider regeneration impacts and regeneration equality outcomes identified in **Chapter 7** are also outlined (**Action 3 to 8**). These are indicative actions that can and should be refined as the regeneration proposals are developed.

This EqlA and EqlA Action Plan should be considered a live document that is updated, refined and monitored at key stages in development of the Proposed Regeneration. In accordance with this, the EqlA Action Plan has been updated to reflect any progress taken towards these actions as of September 2025, primarily focusing on the actions to be undertaken prior to making the potential CPO.

Table 8-1: EqlA Action Plan

Action no.	Actions to be undertaken	Responsible owner	Timescale for Resolution	Update (September 2025)
Direct CPO				
1	Resident Relocation Strategy/ Policies <ol style="list-style-type: none"> Consider and outline appropriate financial support, housing options and non-financial measures being offered/provided to homeowners (occupiers and non-occupiers), private tenants and temporary accommodation tenants. Undertake regular monitoring and engagement with residents being relocated to measure the level of success of activities in the land assembly and relocation strategy. This should take place during the relocation process and in the long-term following relocation. Provide temporary accommodation tenants with contact details for LBHF and identify them as the Housing Authority responsible for supporting re-housing those in temporary accommodation. 	OPDC Development Team	Prior to making CPO	<ul style="list-style-type: none"> OPDC has produced a Land Assembly and Relocation Strategy outlining CPO compensation code for residential interests and a designated OPDC Official to consider further assistance on a case-by-case basis. OPDC encourage eligible residents to seek independent advice and will reimburse reasonable cost for this service. OPDC has appointed a Resident Friend that will approach eligible residents to offer support as an intermediary independent of OPDC. OPDC has agreed terms for a licence pending development with LBHF to provide temporary accommodation units until the units are required for the Proposed Regeneration. Regular meetings will be held to provide

	<ul style="list-style-type: none"> iv. Consider actions to support LBHF to avoid homelessness, including occupancy until the site is required for regeneration. v. Consider undertaking benchmarking exercise of London resident relocation policies in practice. 			<p>updates on the regeneration programme to enable sufficient notice to vacate tenants from the property and work closely with tenants to minimise disruption.</p> <ul style="list-style-type: none"> • OPDC has contacted temporary accommodation tenants directly to provide background on the CPO process and confirm LBHF are the Housing Authority responsible for relocation.
2	<p>Business Relocation Strategy/ Policies</p> <ul style="list-style-type: none"> i. Consider and outline appropriate compensation and support measures being offered/provided to business owners and employees to support successful relocation, such as finding alternative affordable business units, supporting upfront cost of moving and considering the early release of compensation payments. ii. Signpost options for Independent Business Advisors and mobilise appropriate funding to cover reasonable costs for these services. iii. Undertake regular monitoring and engagement with businesses that are being relocated to observe the success of policies in the land assembly and relocation strategy. This should take place during the short term during the relocation process and in the long-term following relocation. iv. Undertake benchmarking exercise of London business relocation policies in practice. 	OPDC Development Team	Prior to making CPO	<ul style="list-style-type: none"> • OPDC has prepared a Land Assembly and Relocation Strategy that outlines policies for occupier engagement for eligible businesses. This includes adhering to the CPO compensation code and appointing a Business Engagement Officer to each business as the principal point of contact in each case and responsible for providing support to the business through acquisition and relocation. • OPDC are exploring the early release of compensation payments where required. • OPDC are assisting with identifying alternative business units that meet the needs of the current business. • OPDC has reviewed other London-based Business Relocation Strategies and will continue to do so throughout the CPO process.
Further recommendations for scheme development				
3	<p>Community Engagement Plan/ Communications Plan</p> <ul style="list-style-type: none"> i. Consider innovative solutions to improve reach to groups which are “traditionally” hard to reach (e.g. online resources to reach young people). ii. Promote diversity monitoring for all engagement activities (i.e. attendance list, % of people from 	OPDC Communications, Engagement and Strategy Team	Ongoing scheme development	Work is ongoing to develop a Community Engagement Plan/ Communications Plan.

	<p>ethnic minority backgrounds, % older people, etc).</p> <p>iii. Consider and accommodate the need for specific language and interpreter needs, specifically for CPO but potentially for wider engagement.</p>			
4	<p>Housing strategies</p> <p>i. Consider the mechanism to proactively encourage and prioritise the needs of local renters and buyers as part of the development of a housing strategy/ policy.</p> <p>ii. Establish a mechanism for collaboration with host Boroughs in determining appropriate social housing nominations.</p>	OPDC Development Team	Ongoing scheme development	The OPDC Housing Strategy Lead has been notified of the actions within the EqlA Action Plan.
5	<p>Inclusive design principles</p> <p>i. Development of inclusive design principles in compliance with the London Plan.</p> <p>ii. Create a specific workstream that will focus on inclusive design, including the consideration of TfL guidance and collaboration with local partners, for example Make Space for Girls.</p> <p>iii. Consider the inclusion of a Gender Safety Assessment</p>	OPDC Design Team	Ongoing scheme development	The OPDC Design Team has been notified of the actions within the EqlA Action Plan.
6	<p>Procurement policies</p> <p>i. Review the EqlA Action Plan before proceeding with procurement, expected to start late 2025.</p>	OPDC Development Team	Ongoing scheme development	The OPDC Development Team has been notified of the actions within the EqlA Action Plan.
7	<p>Skills, employment and education related strategies/ policies</p> <p>i. Set up a Working Group comprised of local skills and training providers.</p> <p>ii. Identify local partners to work with in delivering the employment and education opportunities including the Local Boroughs.</p>	OPDC Inclusive Growth Team	<p>Ongoing scheme development</p> <p>Following the appointment of a developer partner Prior to construction</p>	The OPDC Inclusive Growth Team has been notified of the actions within the EqlA Action Plan.

	<ul style="list-style-type: none"> iii. Assessment of local construction training facilities to determine demand for a standalone Construction Skills Centre in North Acton. 			
8	<p>Construction and environmental management</p> <ul style="list-style-type: none"> i. Prepare management plans for construction developed through active engagement with local residents. ii. Consider and review targeted actions for minimising disruptions to specific groups (for example, Bashley Road Traveller Site, older people, disabled people and families with young children) and for specific destinations in the local area such as healthcare and education facilities highlighted in this EqlA. iii. Consider and review of potential cumulative construction impacts from HS2. 	OPDC Development Team and development partner/s	Following the appointment of a developer partner Prior to construction	The OPDC Development Team has been notified of the actions within the EqlA Action Plan.

9. Conclusions and next steps

9.1 Conclusions

The exercise of compulsory purchase powers may be required to enable the full extent of the proposed Old Oak site to be brought under OPDC's control, enabling the Proposed Regeneration to contribute to improvements in the area through a net increase in housing, new employment opportunities associated with the construction and the completed development as well as new leisure, retail and community facilities, commercial units and public open space. The CPO can help move the proposals forward towards realising the identified positive equality impacts and outcomes arising from the regeneration, including:

- A net increase of approximately 8,000 new homes on-site. This includes a targeted provision of 50% affordable housing of which a targeted 60% will be social housing. Plans also include family housing, which can be of particular benefit to protected characteristic groups living in the area. However, affordability barriers may make it harder for certain groups, including low-income, ethnic minority households, children living in low-income households and (mainly female-headed) single parent households, from sharing in this benefit. OPDC should aim to ensure that affordability targets of the development are met and that local people are able to benefit from this housing.
- Employment creation in construction related jobs, as well as approximately 150,000-200,000 sq. m of new commercial and employment space on the site creating significant further employment opportunities. With appropriate procurement and Skills, Employment and Education Plans in place then this can benefit those who are overrepresented in unemployment figures in the area especially young black people.
- An increase in public open space including improved public realm and increased accessibility and connectivity to public transport and active travel networks. People sharing equality protected characteristics are likely to be able to share in these benefits if they are designed in line with inclusive design standards and in collaboration with the local community.
- A new urban centre including a new high street, shops cafes, restaurants, schools and other community amenities such as a new school. Community engagement activities on the Regeneration Strategy are helping to shape proposals.
- Increased health and wellbeing for local people through an increase in open space, enhanced Canalside and improved access to active travel. This can be a benefit for those who are more vulnerable to poor health outcomes.
- Opportunity for new accommodation with improved facilities for businesses on-site and increased footfall, transport links and increased customer base for remaining businesses.

However, the assessment shows that there are some direct potential negative impacts associated with the CPO process:

- Loss of homes for a small number of owner-occupiers.
- Loss of private rental accommodation on-site affecting a small number of existing ethnic minority tenants and including those with children. However, the Proposed Regeneration will result in an overall net increase in residential properties which will benefit the wider community including those with protected characteristics.
- Loss of Council run temporary accommodation on-site, resulting in the loss of 21 studio flats.
- Loss of housing association managed homes.
- Loss of a community facility on site providing educational, wellbeing and other services to the local Muslim community.

- A potential loss of businesses claiming to provide a mix of culturally specific services and goods as well as potential loss of cultural and social connections.
- Potential closure of independent businesses including ethnic minority owned businesses. It is considered that the successful relocation of existing businesses will also depend, in part, on the flexibility of individual businesses, some of which are specific in terms of where they consider an appropriate location for their business to operate successfully.
- Temporary or permanent loss of employment following closure or relocation of affected businesses amongst ethnic minority employees.
- There are also some potential negative impacts associated with construction works including noise, air quality, traffic disruption, safety and security issues. These impacts may have a more adverse effect on certain protected characteristic groups.
- The regeneration of the area could also result in increased property prices which in turn may result in higher rents for local residents.

9.2 Next steps

In order to further minimise negative effects and enhance positive effects identified OPDC should consider implementing the actions contained under the EqlA Action Plan outlined in **Table 8.1**.

The EqlA is a predictive assessment and considers the potential effects of the CPO on groups of people rather than on individuals. The recommendations and actions outlined are therefore suggested to minimise effects on recognised groups with protected characteristics living, working and visiting the area at the time of the assessment.

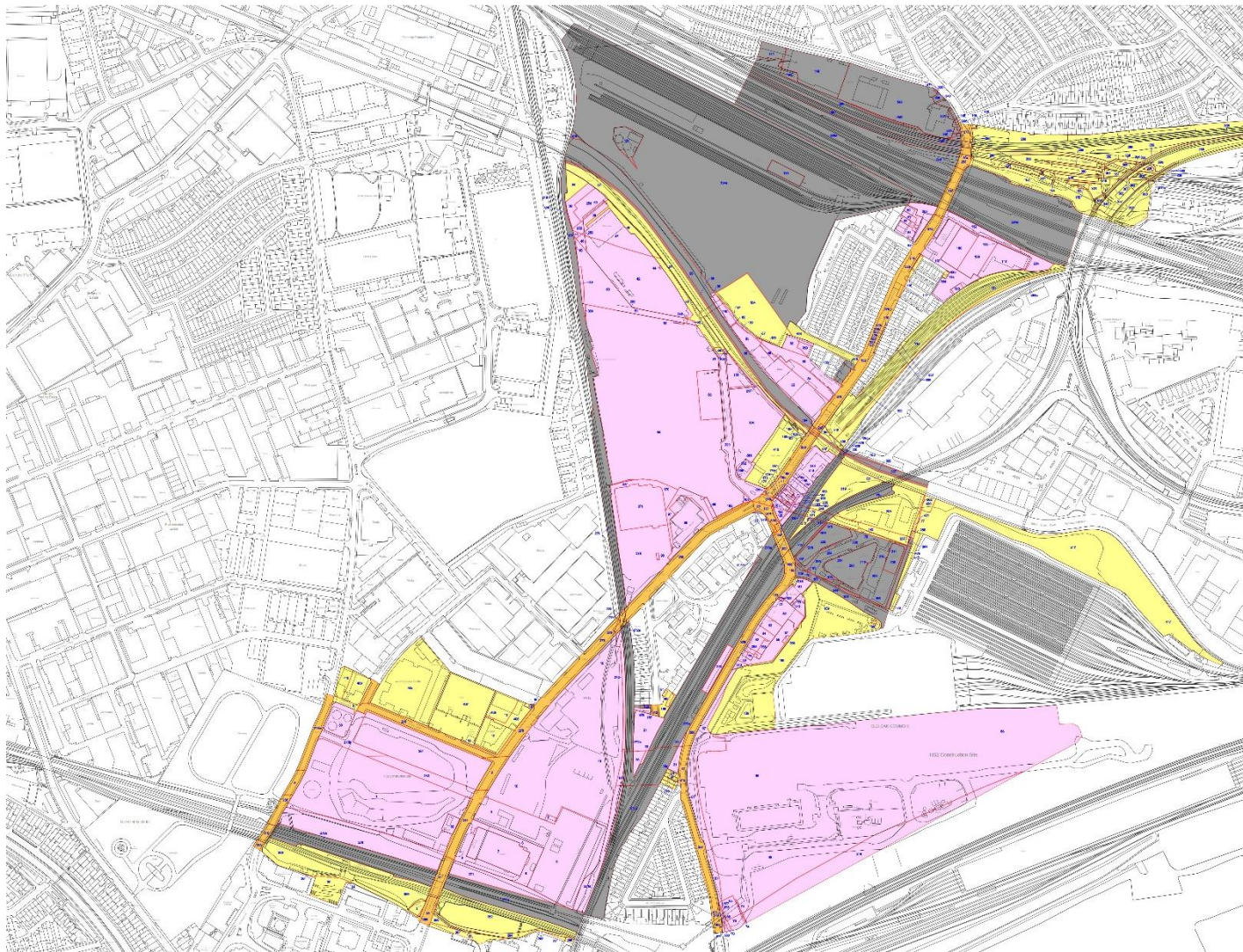
This EqlA should be considered as a live document, and should be updated, refreshed and the actions within it monitored on a regular basis. This should include a monitoring update on the status of identified potential impacts and associated mitigation as undertaken in September 2025. This may result in updates both to the assessment of the impacts and to the actions and recommendations relating to the proposed mitigation measures. As a result of OPDC's requirements as a local planning authority, the pace and scope of progress against actions within the EqlA Action Plan may be informed and revised by any new legislation and planning policy.

The ongoing scheme development should reflect the recommendations of this EqlA and it should be shared across relevant stakeholders for review and awareness.

EqlA updates should be undertaken (but not limited to) the following:

- For the purposes of the CPO inquiry (if required);
- When a planning application is being prepared. This is to include mitigation measures to be proposed for inclusion in a Section 106 agreement;
- Following the appointment of a developer partner (or partners) - to provide more detail around mitigation measures and assign responsibilities;
- Prior to construction - to include mitigation for construction impacts following more detailed design and monitoring of impacts of relocation;
- During construction - to respond to newly identified impacts resulting from construction works; and develop a robust meanwhile use strategy to avoid, where possible, long term vacant sites and maximise opportunities for business continuity and temporary housing; and
- After completion of the Proposed Regeneration to monitor long-term impacts.

Appendix A Old Oak Draft Compulsory Purchase Order area (July 2024)¹²⁶



Produced by: TerraQuest Solutions Limited Quayside Tower 252-260 Broad Street Birmingham B1 2HF www.terraquest.co.uk 0121 234 1300					
© Crown Copyright and database right 2024. Ordnance Survey 100032216					
Key: <div style="display: flex; align-items: center;"> <div style="width: 15px; height: 15px; border: 1px solid red; margin-right: 5px;"></div> <div>Area to be Referenced</div> </div> <div style="display: flex; align-items: center;"> <div style="width: 15px; height: 15px; background-color: pink; margin-right: 5px;"></div> <div>Land to be acquired</div> </div> <div style="display: flex; align-items: center;"> <div style="width: 15px; height: 15px; background-color: grey; margin-right: 5px;"></div> <div>Land to be excluded</div> </div> <div style="display: flex; align-items: center;"> <div style="width: 15px; height: 15px; background-color: yellow; margin-right: 5px;"></div> <div>Uncertain exclusion or partial exclusion of land</div> </div> <div style="display: flex; align-items: center;"> <div style="width: 15px; height: 15px; border: 2px solid orange; margin-right: 5px;"></div> <div>Public Adopted Highway</div> </div>					
Business Unit: Land Referencing			Status: Final		
Approved By: TPR	Date Approved: 03/09/2024	Checked By: DTA	Date Checked: 03/09/2024	Drawn By: KGA	Date Drawn: 03/09/2024
Title: <div style="text-align: center;"> OLD OAK WORKING DRAFT ORDER MAP FOR DISCUSSION ONLY </div>					
Date of Issue: 03/09/2024		Project Code: 401-0093		Scale: 1:2,000 @A0	
Drawing Reference: 401-0093_000527				Version: 6.0	

¹²⁶ Indicative boundary as of July 2024. For the purpose of the surveys, this was the most up to date Order Map available as of 27th August 2024.

Appendix B Equality Survey Notification Letters

B.1 Business notification letter



AECOM Limited

Aldgate Tower
2 Lemn Street
London E1 8FA
United Kingdom
aecom.com

13th August 2024

[address]

Dear Sir/Madam,

Re: Old Oak Regeneration - Equality Impact Assessment Survey

The Mayor of London's development corporation for Old Oak and Park Royal, OPDC is responsible for regenerating the Old Oak and Park Royal area. OPDC has plans for a canalside district at Old Oak, creating thousands of new and affordable homes, new job opportunities, services, amenities and lots of open green space and public realm. The majority of development will be around the new Old Oak Common station, currently under construction.

You may have been involved in the early stages of shaping OPDC's plans for Old Oak last year, when the corporation held a programme of engagement and co-design activities to help shape its vision for the area. To further inform the plans as they progress, OPDC has appointed AECOM to prepare an independent Equality Impact Assessment (EqIA). This will identify potential impacts of regeneration at Old Oak on the existing community, to ensure that OPDC's plans best meet the needs of local people, in particular those with 'protected characteristics'¹²⁷ as defined in the Equality Act 2010.

Part of this work will involve representatives from AECOM conducting interviews with businesses in the area. As such, a member of the team may call at your premises during the survey period 27th August 2024 to 17th September 2024 to request an interview. If there is nobody available when they call, they may seek to arrange an appointment at a more suitable time. The interview should take no longer than fifteen minutes and will seek to gather information on the following:

- Business type/length of time at current premises/lease type
- Number of employees
- Customer base
- Your views on regeneration
- How regeneration could support your business needs and customer base

All AECOM representatives will present formal identification before interviews commence.

It is important to note that OPDC's proposals have not yet been fixed or finalised, and that the feedback received from the EqIA will be used to help inform the plans as they develop.

You are under no obligation to take part in this survey, although we would welcome your participation as the information you provide will help to ensure that regeneration benefits both

¹²⁷ The Equality Act 2010 introduced the term "protected characteristics" to refer to groups that are protected under the Act. More information can be found at: <https://www.equalityhumanrights.com/en/equality-act/protected-characteristics>

existing businesses and newcomers, meets local people's needs and seeks to enhance, rather than impact, communities – particularly those with protected characteristic. It will also help to support the development of proposals and activities to maximise positive social outcomes of local communities.

AECOM is a Market Research Society Company Partner and all information provided will remain confidential and only be used for the purposes of the Equality Impact Assessment in line with the Market Research Society Code of Conduct and General Data Protection Regulation. This survey is part of the standard process ahead of more detailed community consultation to ensure that large development proposals are shaped and influenced by residents and businesses.

If you have any questions about the Equality Impact Assessment then please contact AECOM on the contact details below.

Yours faithfully,
Lucy Jones
Social Impact Consultant
AECOM Limited
E: lucy.jones@aecom.com
M: 07341169792

B.2 Residential notification letter



AECOM Limited
Aldgate Tower
2 Leman Street
London E1 8FA
United Kingdom
aecom.com

13th August 2024

[address]

Dear Resident,

Re: Old Oak Regeneration - Equality Impact Assessment Survey

The Mayor of London's development corporation for Old Oak and Park Royal, OPDC is responsible for regenerating the Old Oak and Park Royal area. OPDC has plans for a canalside district at Old Oak, creating thousands of new and affordable homes, new job opportunities, services, amenities and lots of open green space and public realm. The majority of development will be around the new Old Oak Common station, currently under construction.

You may have been involved in the early stages of shaping OPDC's plans for Old Oak last year, when the corporation held a programme of engagement and co-design activities to help shape its vision for the area. To further inform the plans as they progress, OPDC has appointed AECOM to prepare an independent Equality Impact Assessment (EqIA). This will identify potential impacts of regeneration at Old Oak on the existing community, to ensure that OPDC's plans best meet the needs of local people, in particular those with 'protected characteristics'¹²⁸ as defined in the Equality Act 2010.

Part of this work will involve representatives from AECOM conducting interviews with residents in the area. As such, a member of the team may call at your premises during the survey period 27th August 2024 to 24th September 2024 to request an interview. If there is nobody available when they call, they may seek to arrange an appointment at a more suitable time. The interview should take no longer than fifteen minutes and will seek to gather information about this household, views on regeneration and how regeneration may help to meet resident needs and support quality of life. All representatives will present formal identification before interviews commence.

It is important to note that OPDC's proposals have not yet been fixed or finalised, and that the feedback received from the EqIA interviews will be used to help inform plans as they develop.

You are under no obligation to take part in this survey, although we would welcome your participation as the information you provide will help to ensure that regeneration benefits both existing residents and newcomers, meets local people's needs and seeks to enhance, rather than impact, communities – particularly those with protected characteristic. It will also help to support the development of proposals and activities to maximise positive social outcomes of local communities.

AECOM is a Market Research Society Company Partner and all information provided will remain confidential and only be used for the purposes of the Equality Impact Assessment in line with the Market Research Society Code of Conduct and General Data Protection Regulation. This survey is part of the standard process ahead of more detailed community consultation to ensure that large development proposals are shaped and influenced by residents and businesses.

¹²⁸ The Equality Act 2010 introduced the term "protected characteristics" to refer to groups that are protected under the Act. More information can be found at: <https://www.equalityhumanrights.com/en/equality-act/protected-characteristics>

If you have any questions about the Equality Impact Assessment then please contact AECOM on the contact details below.

Yours faithfully,
Lucy Jones
Social Impact Consultant
AECOM Limited
E: lucy.jones@aeom.com
M: 07341169792

Appendix C Old Oak West: Equalities Impact Assessment Baseline Report (Arup) [double-click to open]

ARUP

Old Oak West: Equalities Impact Assessment Baseline

Equalities Impact Assessment Baseline Report

| 16th February 2023



This report takes into account the particular instructions and requirements of our client. It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

Ove Arup & Partners Limited
8 Fitzroy Street
London
W1T 4BJ
United Kingdom
arup.com

