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Client: Royal Borough of Greenwich
Project: New all-through special school
Report: Equalities Impact Assessment

QUALITY ASSURANCE

Issue/Revision:	Draft	Final
Date:	July 2023	September 2023
Comments:		Moved sections 3.1 and 3.2 around
Prepared by:	Ruth Skidmore	Petronella Tyson
Authorised by:	Petronella Tyson	Mitch Cooke
File Reference:	552388pt06Sept23FV04_Eql A_041023.docx	552388pt06Sept23FV04_Eql A_041023.docx



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1.0 INTRODUCTION

This Equalities Impact Assessment (EqIA) has been prepared by Greengage Environmental and is submitted in support of Children's Service, Royal Borough of Greenwich's proposal to develop a new All-through Special School. The proposal will include the development of the secondary with sixth form provision (128 students) at Hargood Road, London, and the primary provision (112 pupils) at another site to be determined within the Borough.

The purpose of the Equalities Impact Assessment is to assess the impact of the proposed developments for the Applicant on persons who share a relevant protected characteristic and to determine whether mitigation should be secured as part of any permission to advance equality of opportunity.

The assessment incorporates the following:

- Review of relevant National, Regional and Local Policy and Legislation;
- Desktop analysis of relevant local socio-economic demographics relating to the protected characteristics and deprivation;
- A summary of Children's Service Royal Borough of Greenwich equalities policies and monitoring mechanisms;
- A clear narrative of the purpose and need for the projects;
- An outline of the community engagement process to ensure equalities impacts are considered and monitored;
- Assessment of the equalities impact of the proposal on the existing educational institutions locally and on particular pupil groups;
- Assessment of the potential impacts arising from the proposed developments in relation to wider community and socio-economic equalities;
- Mitigation measures for any negative impacts that are predicted to arise from the proposed developments; and
- Monitoring plans for any residual impacts.

2.0 METHODOLOGY

This EqIA has been prepared in line with the themes set out within the Equality Act 2010. The report summarises the current conditions for each of the protected characteristic groups within the local impact area and determines the effect of the developments on each group.

This assessment reviews how the equal access and opportunity of the following characteristics listed as ‘protected characteristics’ in the Equality Act 2010 are addressed within the proposed developments:

- a. Age;
- b. Disability;
- c. Gender reassignment;
- d. Marriage and civil partnership;
- e. Pregnancy and maternity;
- f. Race;
- g. Religion or belief;
- h. Sex; and
- i. Sexual orientation.

The following policy, legislation and guidance documents have been used to form the baseline assessment:

- a. Equality Act 2010²
- b. National Planning Policy Framework 2021³
- c. The London Plan 2021⁶
- d. Mayors Equality, Diversity, and Inclusion Strategy 2018⁷
- e. The SEND Code of Practice: 0-25⁴
- f. The Children and Families Act 2014⁵
- g. Human Rights Act 1998¹
- h. Royal Borough of Greenwich Local Plan⁸
- i. ONS 2021 Census Data¹³
- j. Indices of Multiple deprivation 2019¹⁹
- k. UK Crime Statistics³²
- l. ONS Claimant Count Data April 2023²⁹

Conclusions regarding the equality and health impacts of the developments were made with best professional judgement, drawing on the baseline assessment for factual context.

Assessment has been carried out in relation to the proposed secondary with sixth form development at Hargood Road as part of the new all-through special school with measures for the primary phase site remaining indicative at the time of writing. It is understood that similar measures will be undertaken once this site has been confirmed.

Significance of Impacts

The definition and terms used to describe the significance of impacts are set out below:

- **Positive Impact** - where development would result in benefits to the protected characteristic groups;
- **Neutral Impact** – where development would have no impact upon the protected characteristic groups; and
- **Negative Impact** - where development would cause a deterioration to the protected characteristic groups.

A distinction between short and long-term; permanent and temporary impacts has been made, where applicable.

3.0 PROPOSED DEVELOPMENT AND SITE CONTEXT

3.1 PROPOSED DEVELOPMENT

The Royal Borough of Greenwich is seeking to establish a new all-through special school which will include classes from reception age to sixth form (ages four to 19 years). Establishing additional specialist school places for children and young people diagnosed with Autistic Spectrum Disorder (ASD) and complex learning needs will support the Local Authority in meeting its sufficiency duty and enable the needs of more children and young people diagnosed with ASD to be educated locally.

The proposed new school will be located across two separate sites within the borough and delivered over two stages. Stage one will develop a brand new secondary with sixth form campus at the former primary school site at Hargood Road, SE3. This new campus is anticipated to open from September 2025.

Stage two will develop the primary phase provision which will be located at an alternative site within the borough; its location is to be confirmed. The anticipated date for opening the primary phase campus is from September 2026.

The secondary with sixth form campus will provide 80 secondary and 48 sixth form places (total of 128 places) while the primary phase campus will provide 112 places.

3.2 SITE DESCRIPTION

The site identified for the secondary with sixth form campus of the proposed all-through special school is at the former primary school site, Hargood Road, SE3. The site for the primary phase is yet to be identified and subject to further feasibility studies.

Hargood Road is a residential area with the majority of housing being two storey private dwellings. The proposed secondary with sixth form site is bounded by residential streets, backing on to gardens, with the A2 to the west and Kidbrooke Playing fields to the south. All points of access to the site are along Hargood Road which is a relatively low traffic environment due to the residential nature of the area. This site is currently vacant, with the previous Kidbrooke Primary School demolished in 2022. The site totals 1.2 hectares.

3.3 USERS AND STAKEHOLDERS

The proposed developments will directly impact several groups in its construction and operation. The development of any Special School should be carried out in conjunction with local young

people and future pupils who have a special educational need or Education Health Care Plan (EHCP) in place.

The key building users and stakeholders identified are:

- Education operators (including the academy sponsor of the new school)
- Local education facilities (Royal Borough of Greenwich Children's Services)
- Pupils
- Staff
- Local communities/ residents

The protected characteristics will be considered holistically but with specific focus on these stakeholder and user groups, considering how proposed buildings can best serve their needs without discrimination or access barriers.

4.0 POLICY AND LEGISLATIVE BACKGROUND

4.1 NATIONAL

Equality Act 2010

The Equality Act² provides a legal framework to protect the rights of individuals and advance quality of opportunity for all. As such, it legally protects individuals in Great Britain from discrimination in the workplace and in wider society. For instance, by ensuring equal access to employment, services, education facilities, and buildings.

The Act entered into force on the 1st October 2010 and combined 116 separate pieces of legislation to simplify and merge previous legislation including the Equal Pay Act 1970, Sex Discrimination Act 1975, Race Relations Act 1976, Disability Discrimination Act 1995, Employment Equality (Religion or Belief) Regulations 2003, Employment Equality (Sexual Orientation) Regulations 2003, Employment Equality (Age) Regulations 2006, Equality Act 2006 (Part 2) and, Equality Act (Sexual Orientation) Regulations 2007.

Significantly, this Act sets out a list of ‘protected characteristics’ that are to be considered in the assessment of equality issues:

- a. Age;
- b. Disability;
- c. Gender reassignment;
- d. Marriage and civil partnership;
- e. Pregnancy and maternity;
- f. Race;
- g. Religion or belief;
- h. Sex; and
- i. Sexual orientation.

It also sets out provisions to eliminate unlawful discrimination, harassment, and victimisation; to advance equality of opportunity; and to foster good relations between communities.

With respect to the Equality Act, it is necessary to assess how the design process, as well as the planned construction and operation of the Proposed Development, has taken communities and equality groups identified above into consideration.

This assessment considers how the identified stakeholders and equality groups can benefit from the Proposed Developments and how their continued participation can be encouraged.

National Planning Policy Framework (NPPF)

The NPPF³ was published in July 2021, replacing the previous NPPF, adopted in February 2019. The revised NPPF sets out the Government's planning policies for England and how they are expected to be applied. It provides a framework within which locally prepared plans for housing and other development can be produced. At the heart of the NPPF is a presumption in favour of sustainable development. As part of this, the NPPF recognises the social role of sustainable development and delivering on social, environmental, and economic objectives.

Within this framework, Chapter 12 'Achieving Well Designed Places' states that planning policies and decisions should ensure that developers meet specific policies including:

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

The SEND Code of practice: 0-25

The SEND Code of Practice: 0-25⁴ provides statutory guidance relating to Part 3 of the Children and Families Act. It promotes inclusive education and describes how the Equality Act and the Children and Families Act 2014 work together to ensure this.

This Code of Practice provides statutory guidance on duties, policies, and procedures. The relevant mandatory guidance for this development is summarised below:

- Local authorities must ensure that children, their parents, and young people are involved in discussions and decisions about their individual support and about local provision;
- Children have a right to receive and impart information, to express an opinion and to have that opinion considered in any matters affecting them from the early years;
- Local authorities must consult children with SEN or disabilities, their parents, and young people with SEN or disabilities in reviewing educational and training provision and social care provision and in preparing and reviewing the Local Offer;
- Local authorities must work to integrate educational provision and training provision with health and social care provision where they think that this would promote the wellbeing of children and young people with SEN or disabilities, or improve the quality of special educational provision; and
- All schools have duties under the Equality Act 2010 towards individual disabled children and young people. They must make reasonable adjustments, including the provision of auxiliary aids and services for disabled children, to prevent them being put at a substantial disadvantage.

The Children and Families Act 2014

The Children and Families Act⁵ came into force on the 1st of September 2014. Part 3 relates to special educational needs and states the following.

A local authority in England must exercise its functions under this Part with a view to ensuring the integration of educational provision and training provision with health care provision and social care provision, where it thinks that this would—

(a) promote the well-being of children or young people in its area who have special educational needs or a disability, or

(b) improve the quality of special educational provision.

4.2 REGIONAL

The London Plan, 2021

The London Plan 2021⁶ was adopted in March 2021, forming the Spatial Development Plan for London and part of the statutory Development Plan for Greater London.

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

Policy GG1: Building strong and inclusive communities

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

Policy GG3: Creating a healthy city

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

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

Policy D5: Inclusive Design

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

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

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

Policy E11: Skills and Opportunities for all

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

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

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

Mayor's Equality, Diversity, and Inclusion Strategy, 2018

The Mayor's Equality, Diversity and Inclusion Strategy sets out the former Mayor's equality framework for London⁷. It commits the Greater London Area to tackle inequality, improve the life chances of Londoners and to remove barriers that hinder them from reaching their potential.

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

Table 4.1 Strategic Equality, Diversity, and Inclusion objectives with relevant groups

Strategic Objectives	Particularly Relevant Groups
9. To work with government, boroughs, developers, businesses, and communities to promote the use of inclusive design through planning, procurement and commissioning of projects and programmes.	Older people, disabled people, parents, women, people from low-income households
16. To work with schools, boroughs, and London Councils to support higher levels of educational progress for the lowest attaining groups and to reduce disparities in exclusions.	Young people, disabled people, people from low-income households
17. To work with London businesses, boroughs, and the voluntary sector to create more opportunities for young people to gain work experience and wider career and employment opportunities, especially in the STEM, digital, cultural, and creative sectors.	Young people
18. To work with boroughs, education and skills providers, businesses, and voluntary and community groups to help increase the number and diversity of people gaining the skills they need. This includes progression through further/higher level learning and training, and higher level and degree apprenticeships, and into higher skilled work.	Young people - in particular, those from low-income households, black, Asian, and ethnic minority young people, disabled young people and care leavers
19. To work with employers, education and skills providers, and voluntary and community organisations so that as many Londoners as possible can participate in, and benefit from, employment opportunities in London. This includes providing employability and skills support for those who are disadvantaged in London's skills, enterprise, and jobs market.	Black and Minority Ethnic Groups, older women, Deaf and disabled people, low-income households, lone parents, ex-offenders, veterans, carers, care leavers, refugees, migrants
23. To work through Transport for London and with the London boroughs, development partners and other planning authorities to help change London's streets and public places to address barriers to walking and cycling, and make sure they focus on accessibility and inclusion issues.	Black and Minority Ethnic Groups, older people, disabled people, women, low-income households

4.3 LOCAL

Royal Greenwich Local Plan: Core Strategy

The Local Plan⁸ was published in July 2014 and sets out how the Borough will develop over a 15-year period (up to 2029), aiming to improve the lives of the people who live and work there, whilst retaining the strong history and identity of Royal Greenwich. The following policies are considered relevant to the proposed developments and to the protection of listed characteristics under the Equality Act.

Policy DH1 Design:

Developments are required to be of high-quality design and to demonstrate that they positively contribute to the improvement of both the built and natural environments. This includes creating a positive relationship between the proposed and existing urban context, retention of trees, ensuring quality materials, using appropriate scale, height, bulk, and massing in relation to the adjacent townscape, reflecting patterns of activity, movement, and circulation, understanding the cultural diversity of the area, and demonstrating that the development contributes to a safe and secure environment.

Policy OS1 Open Space:

Aims to safeguard, enhance, and improve access to existing public and private open space.

Policy CH1 Cohesive Communities:

Stipulates that all development must include measures that help to create and maintain cohesive communities, which encourage diversity and reduce inequalities between areas. Facilities must be easily accessible for all and consider community safety and aim to discourage crime. This policy also encourages the shared use of community facilities.

Policy CH2 Healthy Communities:

All development must allow and enable residents to lead more healthy and active lifestyles and address health inequalities. This involves active living for all age groups, including older people, ensuring there is accessible walking, cycling and public transport infrastructure and ensuring access to local healthy food.

Policy IM4 Sustainable Travel:

The needs of pedestrians, including those with disabilities, and cyclists should be prioritised in development and the design and layout of development should reflect this. High standards of safety, accessibility and convenience will be required, including establishing and maintaining links with public transport.

Royal Borough of Greenwich Local Plan: Infrastructure Delivery Plan (October 2021)

The Infrastructure Delivery Plan⁹ for RBG sets out the following criteria and drivers for future provision of SEND education within the borough under section 10:

- A need to increase specialist provision for children with the most complex needs so that they can continue to be educated locally without the need to travel.
- Options are being considered to meet future needs in terms of more specialist places and improving facilities.
- Assuming the proportion of children and young people with special educational needs or disabilities remains the same, it is estimated that there will be around 200 more children and young people with an Education Health Care Plan in 2023, compared with 2018.

5.0 LOCAL DEMOGRAPHICS

This section of the report provides a desktop analysis of relevant local socio-economic demographics relating to the protected characteristics and deprivation in the Royal Borough of Greenwich (RBG).

Pupil Demographics

In relation to the proposed secondary with sixth form campus of the all-through special school at Hargood Road, there is currently no school on site and therefore the proposed development would represent a new special school facility in the area.

The proposed schedule of accommodation provides for a two form of entry secondary with sixth form campus onsite. The student provision will be as follows:

- Secondary = 8 students per class (Years 7 to 11) for 80 students in total
- Sixth Form = 8 students per class (Years 12 to 14) for 48 students in total

On a separate site (yet to be confirmed), the proposed schedule of accommodation for the primary phase site of the all-through special school is expected to provide the following:

- Primary = 8 pupils per class (Reception to Year 6) for 112 pupils in total

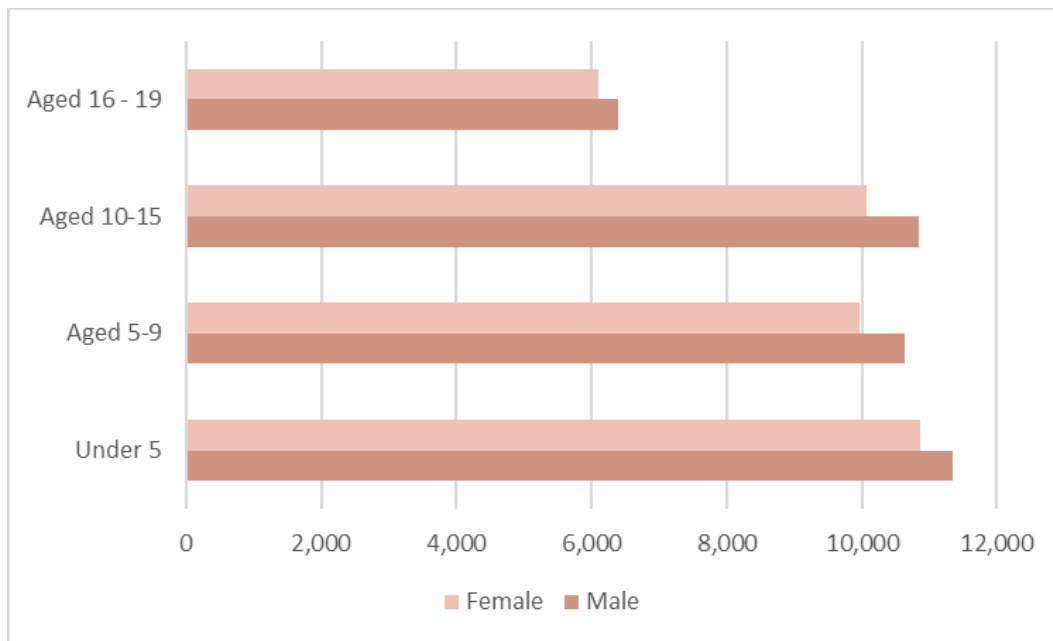
Based on the RBG Special Educational Needs & Disabilities Partnership Strategy¹⁰ there were 44,682 children and young people attending a Royal Greenwich school in January 2021. Of these 14.2% require SEN support and 3.5% have an Education Health and Care Plan in place. This suggests a wider need for a SEND school in the local area.

Autistic spectrum disorder (ASD) is the most prevalent primary need at 46% which is much higher than the England average (30%). Similarly, speech, language and communication needs are the most prevalent primary need within the SEN support cohort of pupils (40%) which is higher than the England average (24%).

The Department for Education's Local Area SEND Report 2019/20¹¹ identified 15.3% of school pupils in England have a have a statutory plan of SEN (statement or EHC plan) or are receiving SEN support. This compares to a higher average of 17.7% of pupils across RBG.

School Census information¹² is gathered annually within RBG. The latest published data shows that across all age groups the percentage of male and female is similar as shown in the figure below.

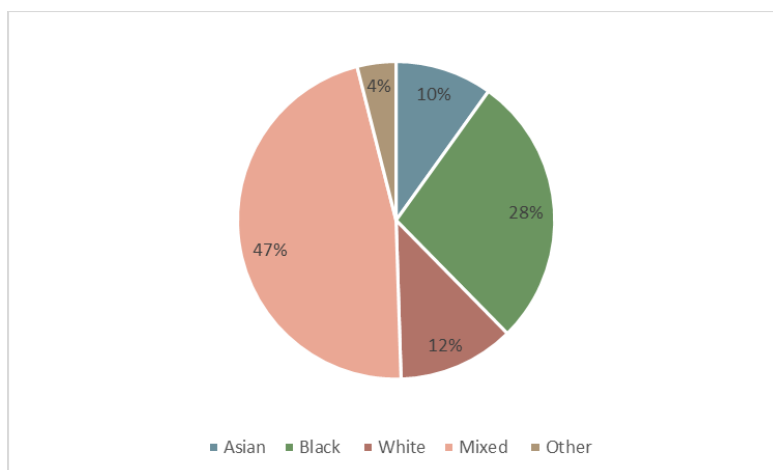
Figure 5.1 Pupil Age Structure



Source: 2018_Context_of_Royal_Greenwich_and_its_Children_and_Young_People.pdf

The School Census data¹² also shows the ethnicity of pupils within the RBG. The greatest proportion of pupils are white, equating to 47%. The percentage of Black and Minority Ethnic pupils increases in the younger age groups, equating to 66% of 5–9-year-olds compared with 52% of 16- to 17-year-olds. The ethnicity of all pupils aged 0-18 is shown in Figure 5.2.

Figure 5.2 Pupil Ethnicity



Source: 2018_Context_of_Royal_Greenwich_and_its_Children_and_Young_People.pdf

Community Demographics

A desktop review of the currently available baseline data has been conducted to establish an equality profile baseline of borough.

Levels of general inequality have been considered, along with determinants of equality. The Equality Act (2010) describes several 'protected characteristics'. The equality profile baseline has, therefore, considered data sets based on these protected characteristics that have the potential to be affected by the Proposed Development.

It is important when undertaking an assessment of the equality's effects that the geographical scope of the assessment is clearly understood. As the school serves the population of children diagnosed with SEND across the borough, the scope of the impact will be borough wide, as opposed to a school catchment level at ward.

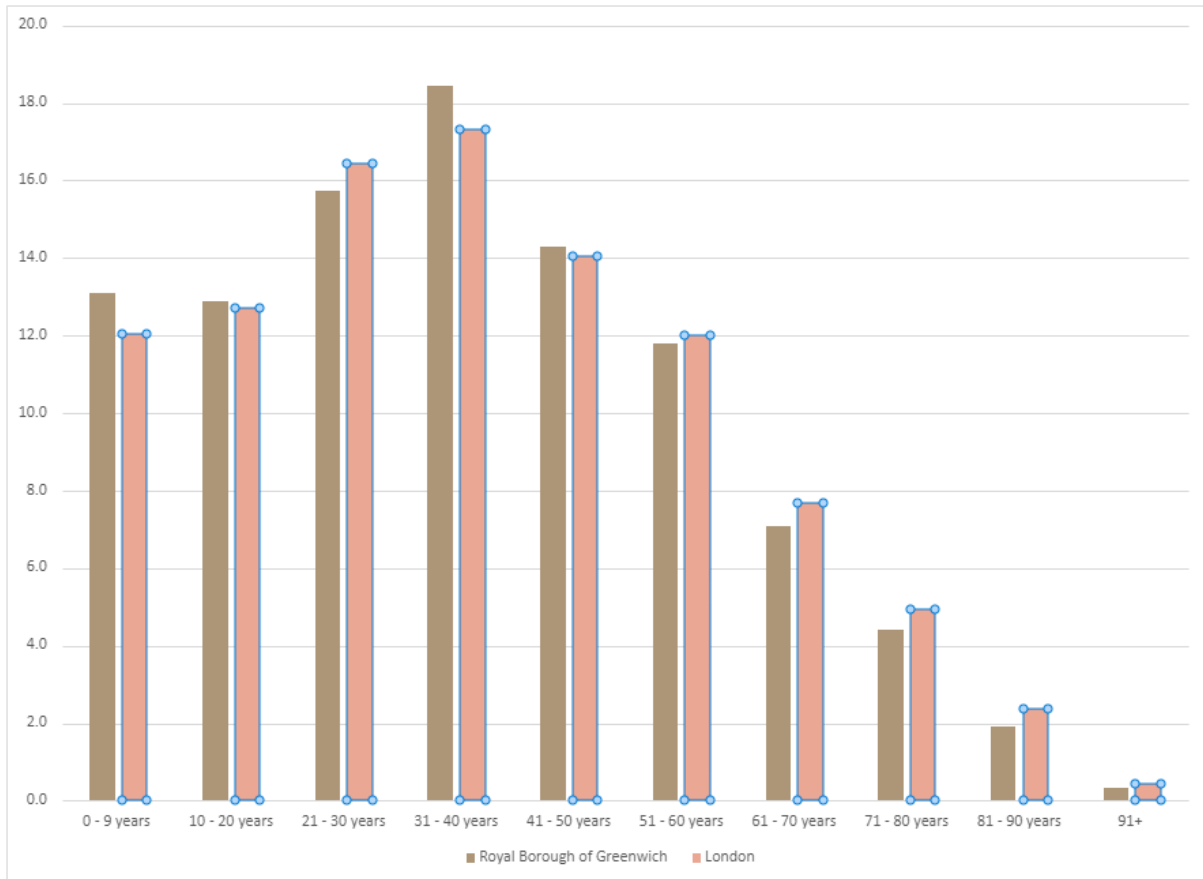
For comparison purposes and to understand the wider context of the baseline conditions reviewed, the following additional geographic scopes have been considered where appropriate, paying special regard to the proposed secondary with sixth form campus of the all-through special school at Hargood Road:

- Borough: Royal Borough of Greenwich (RBGG);
- Regional: London; and
- National: averages for England, Great Britain, or the United Kingdom dependent upon data availability to provide context.

Age

According to ONS 2021 census¹³ data, the greatest proportion of residents are aged between 31 and 40 years in RB Greenwich and London. This is shown in Figure 5.3 below.

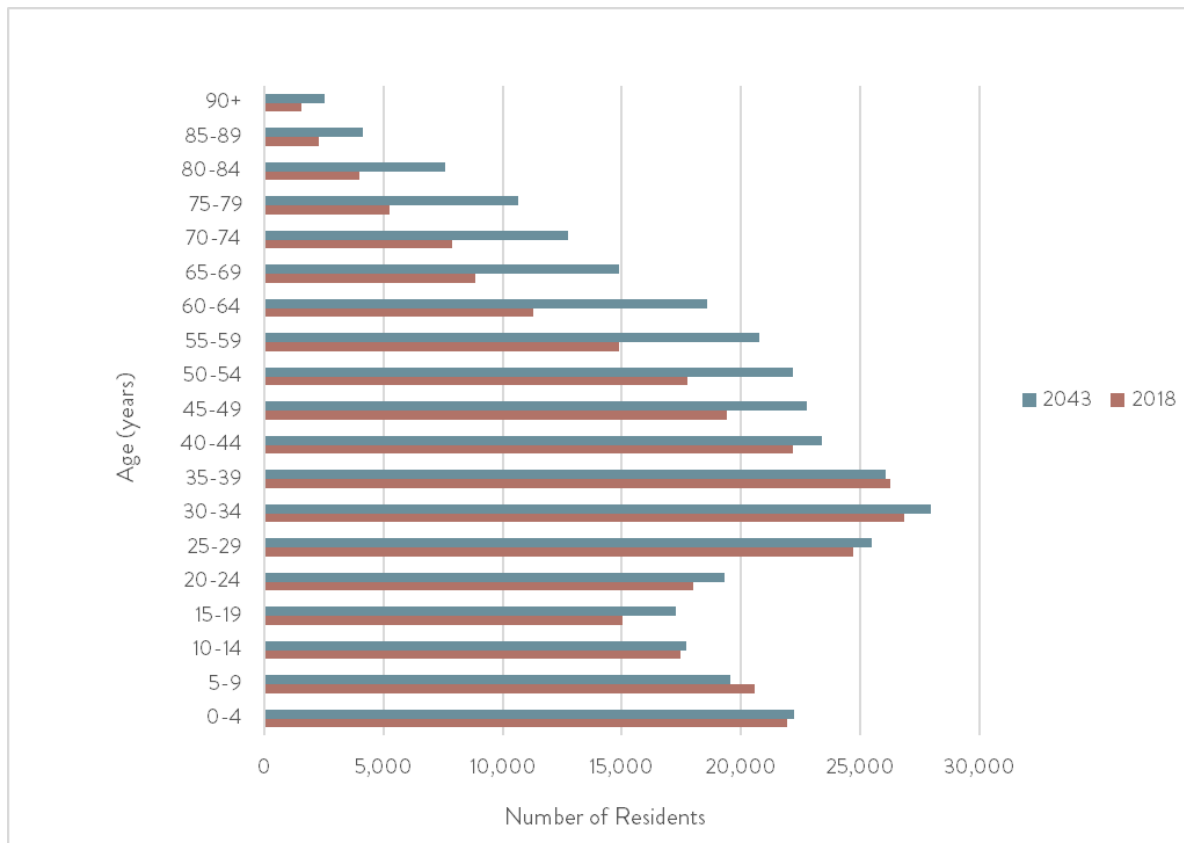
Figure 5.3 Age Structure



Source: 2021 Census data

Population forecasts for RBG show that the population is expected to increase by 17.3% (49,603 persons) between 2018 and 2043¹⁴. The proportion of residents aged 65 and above is predicted to increase by 76.3% over this period due to longer life expectancy. By 2043, 15.6% of residents will be over 65. The figure below shows the age profile for RBG in 2018 and 2043 and shows that RBG is anticipated to have an ageing population in the future.

Figure 5.4 RBG Population Projections, 2018 to 2043



Source: ONS subnational population projections, 2018-based

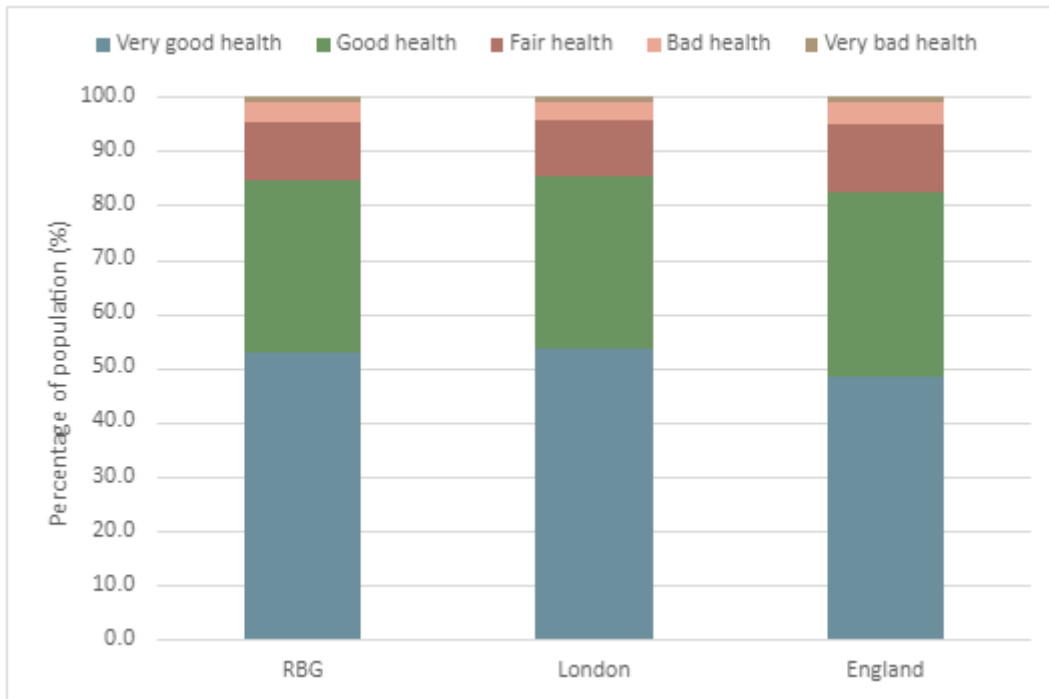
Disability and Health

Disability is defined as having a physical or mental impairment that has a substantial and long-term adverse effect on your ability to carry out normal day-to-day activities.

According to the 2021 Census¹⁵, 8.4% of residents within RBG have day-to-day activities limited a lot and 9.3% of residents have day-to-day activities limited a little.

The figure below summarises the overall health across the local authority, and region. This shows that the percentage of people in good and very good health is similar RBG and London in comparison to national average.

Figure 5.5 General Health

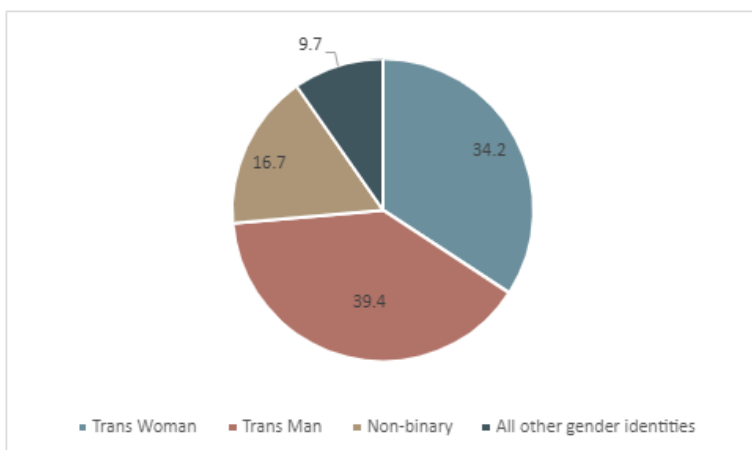


Source: General health age standardised - Census Maps, ONS 2021

Gender Reassignment

The 2021 Census¹³ reported on gender identity. This shows that within RBG 91.96% of people aged 16 years and over, have a gender identity the same as their sex registered at birth. 7.6% did not respond to the survey question and 0.88% have a gender identity different to that registered at birth. Of this, 39.4% are Trans Men, 34.3% Trans Women, 16.7% Non-binary and 9.7% other gender identities. This is similar to London where 0.5% of the population have a gender identity different to that assigned at birth. This is shown in the figure below.

Figure 5.6 Gender Identity in RBG



Source: Gender Identity in RBG - Census 2021

Marriage and Civil Partnerships

Within RBG 38.0% of people aged 16 years and over are married or in a registered civil partnership. 8.2% are divorced or have had their civil partnership dissolved and 3.9% are widowed or are the surviving partner of a civil partnership.

Pregnancy and Maternity

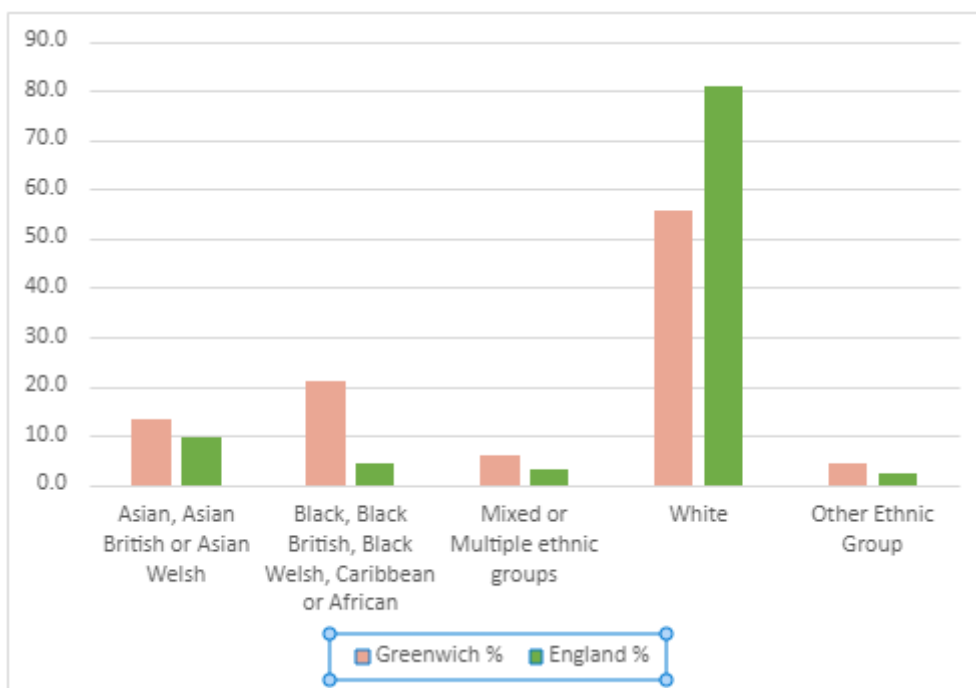
According to the 2021 Census¹³, 32.3% of households have dependent children and 11.1% are lone parent households in RB Greenwich. The Lewisham and Greenwich NHS Trust published data in 2022 showing the types of care and number of births within the trust. This data shows that within the Lewisham and Greenwich NHS Trust, 60.7% of births were between the gestational period of 38-40 weeks. 45.2% of births were spontaneous, 23.2% by caesarean and 25.6% by surgical or medical induction¹⁶.

Race

According to the 2021 Census¹³, within RB Greenwich 55% of residents are of White ethnicity, 13 % of residents are of Asian/ Asian British ethnicity, 21% of residents are of Black/African/Caribbean/Black British ethnicity, 6% of residents in the ward are of Mixed ethnicity and 4% are of other ethnicities.¹⁷

The ethnicity within to RB Greenwich differs to the average across England as shown in the figure below.

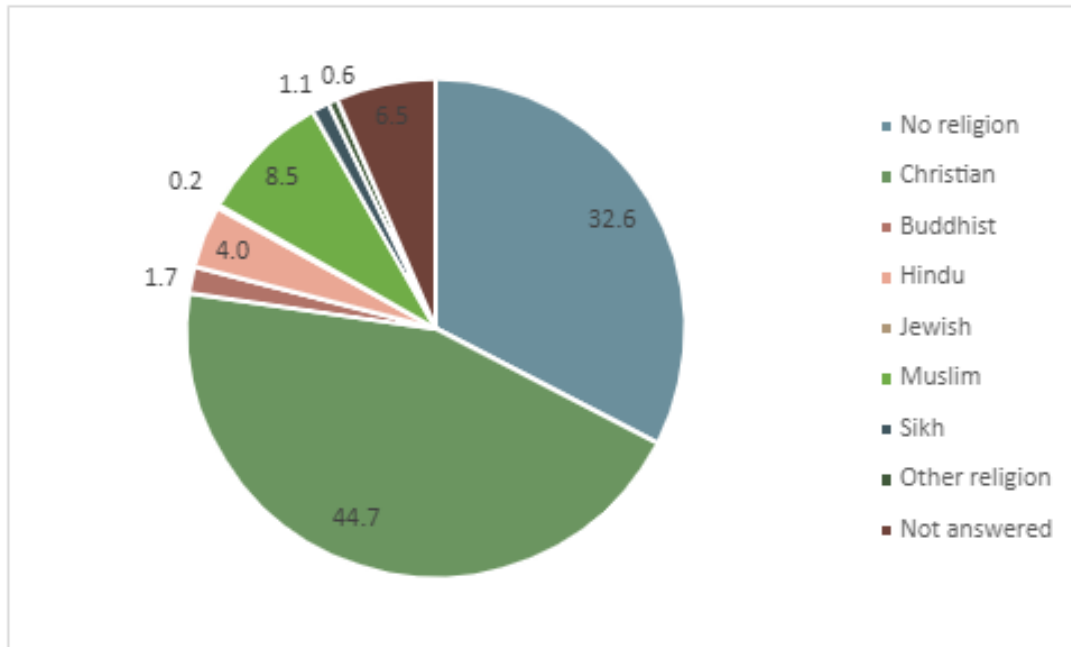
Figure 5.7 Ethnicity



Religion or Belief

According to the 2021 Census¹³, 67% residents in Royal Borough of Greenwich are religious with the most common religions being Christian, Muslim, and Hindu equating to 44.7%, 8.5% and 4% of residents respectively¹⁸. This is shown in Figure 5.8.

Figure 5.8 Religion in Royal Borough of Greenwich



Sex

According to the ONS 2019 population estimates¹⁴, RBG has a total population of 289,068 residents of which 50.4% are male and 49.6% are female.

Sexual Orientation

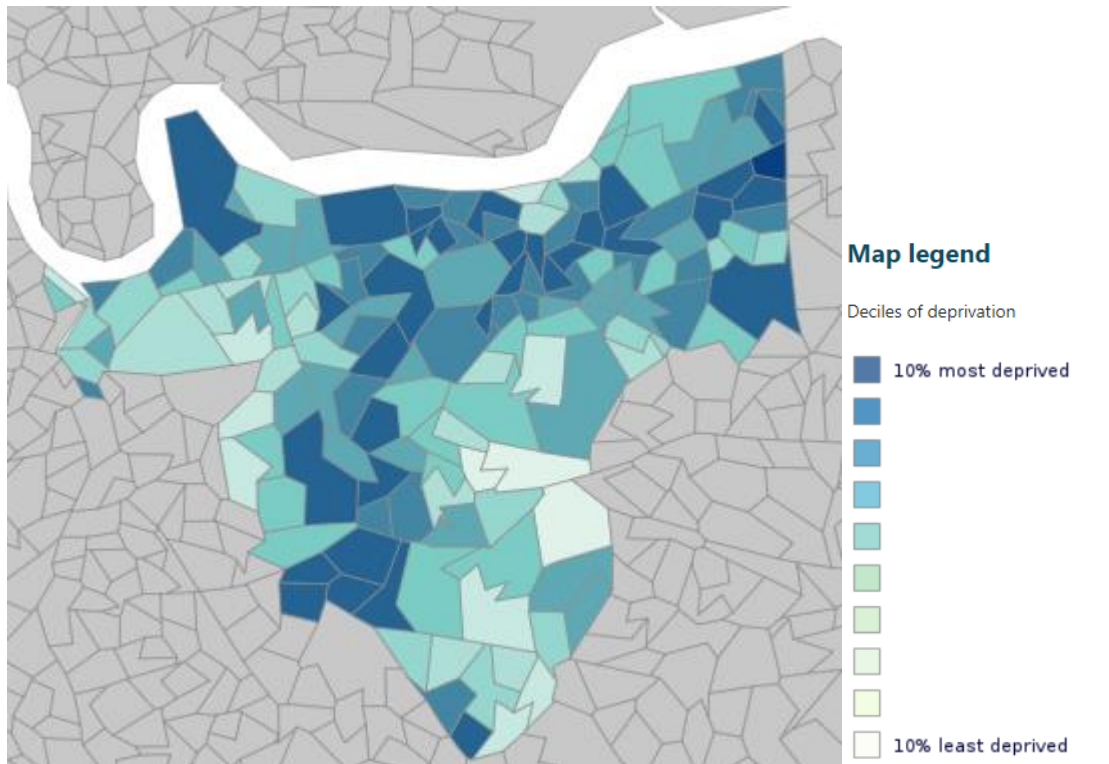
The 2021 Census reported on sexual orientation. This shows that within RBG 86.96% of people aged 16 years or over are heterosexual, 2.74% are gay or lesbian, 1.47% are bisexual and 0.55% are of other sexual orientations.

Deprivation and socio-economic status

The Indices of Deprivation (2019) Multiple Deprivation Domain showed that Greenwich ranks 60 out of the 317 local authority districts in the UK.¹⁹ The Multiple Deprivation Domain measures the relative deprivation of local authorities and smaller areas, LSOA's according to a range of variables including wealth, health, and quality of life (See Figure 5.9). 191 of 317, or 60%, of the LSOA's in Greenwich all in the top 10% most deprived nationally.

The Hargood Road site sits within two areas of deprivation within the Kidbrooke and Hornfair Ward. This means it straddles both the 30% and 40% of most deprived neighbourhoods.

Figure 5.9 Greenwich LSOA's, Index of Multiple Deprivation (IMD) 2019



Source: *Indices of Deprivation 2015 and 2019 (communities.gov.uk)*

The Indices of Deprivation (2019) also shows that Greenwich is 132 out of 317 in Health Deprivation and Disability Domain. This domain combines four indicators about a range of health issues. These indicators are Years of Potential Life Lost (YPLL); Comparative Illness and Disability Ratio; Measures of acute morbidity, derived from Hospital Episode Statistics; and the proportion of adults under 60 suffering from mood or anxiety disorders based on prescribing suicide mortality rate and health benefits data.

Under the Income Deprivation Affecting Children Domain, the borough is ranks 34 out of 317 nationally. This measures the proportion of children aged 0 to 15 living in income deprived families.

For Education, Skills and Training Domain which measures the lack of attainment and skills in the local population, the borough ranks at 193 out of 317.

6.0 EQUALITIES POLICIES AND PROCEDURES OF THE APPLICANT

Special Educational Needs and Disabilities Partnership Strategy¹⁰

This strategy outlines the values, principles and key priorities that will guide the Royal Borough of Greenwich in its decision-making process between April 2019 and March 2024. This sets out five key drivers which are summarised as follows:

1. **Identifying and Assessing Early Needs:** This focuses on improving the timeliness and quality of Education and Health Care Plans, improving consistency between schools in the identification of pupils with SEND, improving timeliness of assessments and ensuring there are sufficient staff to support children;
2. **Meeting Identified Needs:** Through improved access to, and diversity of, local community based short breaks provision, completion of a joint strategic needs assessment for children and young people with SEND and development of a social, emotional, and mental health (SEMH) strategy;
3. **Improving Outcomes:** through increased opportunities for children and young people to develop independence skills from an early age and working with schools to improve academic outcomes at Key stage 4;
4. **Preparing for Adulthood:** This includes working with families to support the transition to adulthood, developing young adult day opportunities services in their community. And increasing the opportunities available for apprenticeships and supported internships; and
5. **Improving Services for Children with Autistic Spectrum Disorder (ASD):** through developing and integrating ASD pathways for 0- to 25-year-olds, developing a parent support programme and reducing the ASD waiting list.

Accessibility strategy for education settings in the Royal Borough of Greenwich²⁰

This strategy aims to increase the extent to which pupils with SEND can access early years, school and college curriculum, improve the physical environment of schools, enhance the delivery of information, advice and guidance to all children and young people with SEND and their families, maximise inclusion for all children and young people and ensure that engagement with children, young people, their parents and carers, other groups and agencies is appropriate and timely.

The proposed developments will be assessed against the following criteria in terms of equalities impacts:

- All children and young people should have regular opportunities to learn, play and develop alongside their local community;
- Barriers to participation and achievement should be overcome as far as possible and children and young people encouraged in their aspirations;
- Children and young people should be supported by adults who work in partnership with them, their families and the other professionals that support them; and
- Cultures, policies, and practice should be developed to ensure the inclusion of all children and young people.

7.0 PURPOSE AND NEED FOR THE PROJECT

Royal Greenwich Childrens Services have carried out borough wide assessments to identify the purpose and need for the project. The need for SEND provision and demand for specialist places is expected to increase over the next five years, particularly for those pupils with Autistic Spectrum Disorder (ASD) with complex learning needs, moderate learning difficulties (MLD) and social, emotional, and mental health (SEMH) needs.

There is also anticipated to be an increase in the number of young people in RBG who hold an Education Health and Care (EHC) Plan over the medium term. The growth in number is largely due to EHC Plans being extended to cover pupils up to the age of 25 and due to the growing number of children in RBG. There is also expected to be further growth in demand in the north of the borough as new housing is complete.

There are currently four special schools managed by the RBG. The impact on these facilities and the wider local education provision is considered in Section 9.2.

The School Place Planning and Capital Programme 2022/23 - 2024/25 report²¹ states;

Taking account of currently known trends, the current pressure in the system, and that there is a significant backlog of young people awaiting an Autistic Spectrum Disorder assessment, demand for places in primary phase specialist provision is likely to rise by in excess of 100 over the medium term.

In the secondary phase, including those aged 16 -19, the number of pupils requiring specialist provision is anticipated to increase by more than 180 over the medium term as more young people transfer from the primary phase. Of those, on current trends, the number of 16-19-year-olds requiring specialist provision is likely to increase by more than 60. As there is limited provision within the borough, there is a need to develop provisions locally to avoid costly in/out-of-borough specialist places.

The demand for other specialist secondary provisions is also increasing, specifically in relation to social, emotional, and mental health (SEMH) for girls and moderate learning difficulties (MLD) places. Currently, some young people who need a specialist MLD placement are placed in an in-borough special school within a peer group that has far more severe/complex learning needs and where the curriculum offer is not as broad as it should be for young people with MLD. This also has an impact on being able to place young people with severe/complex learning needs as places at in-borough special schools are being taken up by young people with less complex needs. Others are placed in mainstream provision with a high level of support funding but are struggling with the demands of being in larger classes and curriculum content not being appropriate, with less specialist staff and resources in place.

This indicates a clear need for new SEND provisions to meet increasing demand. This EqIA supports the proposals for new primary and secondary special schools, and specifically the use of

the central, brownfield site at Hargood Road, to secure additional specialist secondary with sixth form places for students with ASD and complex learning needs.

8.0 RECOMMENDATIONS FOR THE COMMUNITY ENGAGEMENT PROCESS

The SEND Code of Practice: 0-25⁴ highlights the following strategy for engagement which should be implemented here.

"When organising participation events for young people, local authorities should endeavour to ensure full accessibility by considering:

- **timing:** holding events when young people are most likely to be free and not when they are likely to be in education (unless arrangements have been made with their education providers).
- **transport:** explaining to young people how to travel to an event, with clear instructions and maps.
- **physical accessibility:** for example, access for a number of wheelchair users
- **accessibility of content:** providing materials in different formats and tailored to meet different cognitive abilities and reading skills and supporting different communication needs, avoiding jargon and acronyms wherever possible and where this is not possible, explaining terms used.
- **age appropriateness:** keeping membership of young people's forums under review as the participants get older, and bearing in mind the very different stages that young people will be at¹.

This policy also highlights the necessity of engaging young people and their families in decisions that impact on their education and the local offer. Therefore, the following guidance for engagement is recommended. This takes a three-pronged approach, maximising the impact and the number of people who will be able to access and respond to materials.

8.1 ONLINE ENGAGEMENT

Overview	Create a bespoke section of the Greenwich Community Directory to display current drawings and rationale behind the proposed developments. This should include an online survey giving people the chance to offer feedback and a link should be provided on the Local Offer directory page and within the SENCO Newsletter. The link should offer multiple choice response options as well as space for free text. Multiple choice questions should have answers that are easy to quantify and monitor.
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Code of Practice Guidance	Measures in Place
Timing	Create a bespoke section on the Greenwich Community Directory to display current drawings and rationale behind the proposed developments. If significant time is expected between the delivery of

¹ SEND_Code_of_Practice_January_2015.pdf (publishing.service.gov.uk) p.62

Code of Practice Guidance	Measures in Place
	<p>primary and secondary schools, these displays should be separated and targeted per provision. These should include an online survey giving people the chance to offer their feedback and a link should be provided on the Council's SEND Local Offer directory website and within the SENCO Newsletter. Online engagement meetings will be held with young people and their families through specific online consultation and events. Due to the digital nature of this engagement strategy, there are no time limitations on when people can access information. The SENCO Newsletter is published bi-monthly, and information should be published in a minimum of two of these newsletters for each proposed school. Steps should be taken to ensure the information is available online from the earliest possible date and remains active for the length of the consultation period. In all cases the end date of the consultation period should be made clear.</p>
Transport	No transport is required due to digital engagement approach.
Physical Accessibility	No physical access is required due to digital engagement approach.
Accessibility of Content	<p>The content should be enabled to allow audio-descriptions of the information provided and narration of the questions. Audio description text and easy read formats should be provided by the architectural team and independently reviewed to ensure a fair description of the proposed developments has been provided.</p> <p>It is recognised that parents may have learning needs as well as many for whom English is an additional language (10% of RBG households have no members with English as a main language). Therefore, consultation platforms will be supported by virtual or face to face meetings to ensure all access needs are met with appropriate personalised support.</p> <p>To support people where English is an additional language, literature will be easy read e.g., Text should be broken down into short sentences, images used to represent each sentence of text where possible, and language simplified wherever possible.</p> <p>The use of online engagement raises the issue of digital exclusion and those who may not have internet access. It is therefore proposed that other means of engagement are used to ensure multiple entry points allowing all people impacted to have the opportunity to provide comment.</p>

Code of Practice Guidance	Measures in Place
Age Appropriateness	It is recommended that feedback surveys have multiple formats, with respondents being directed to the one relevant to them. Each should be tailored to a specific demographic and be worded/depicted appropriately. As a minimum, this includes variations for young people who will be impacted by the local offerings and the buildings themselves; for parents , carers and guardians of those with SEN and disabilities; for teachers and specialist teaching assistants who will work in the proposed developments or have experience in similar settings; and finally, there should be opportunity for the wider public to offer feedback relating to design, location and other impacts on the local community.

8.2 IN PERSON ENGAGEMENT

Overview	Two live events that would allow stakeholders to speak to the design team, view the plans and drawings of the proposed developments, and offer feedback. If significant time is expected between the delivery of primary and secondary schools, these live events should be separated and targeted per provision. This should include a physical model that is tactile and a variety of presentation formats to suit the needs of all people who will attend the events. Engagement in person will also be carried out through existing forums with young people and their families which are hosted by RBG Children's Services as part of the Local Offer.
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Code of Practice Guidance	Measures in Place
Timing	It is recommended that two events are run at different times of day. This will allow greater access to those who have work or caring responsibilities and ensure maximum opportunities for engagement. Timings may include evenings and weekends so as not to clash with times when young people are in education. Alternatively, arrangements could be made with existing local education providers for this to take place during school hours.
Transport	Clear literature should be provided explaining to young people how to travel to both events with clear instructions and maps. Local taxi services should be notified about the event to ensure accessible vehicles are

Code of Practice Guidance	Measures in Place
	available during the timeframes. A location should be chosen that is near public transport as well as having a private car park with accessible bays.
Physical Accessibility	A suitable location for events should be chosen based on the accessibility of the building/ room. This should include step free routes, as well as spaces that have controllable noise and lighting conditions to reduce sensory impacts.
Accessibility of Content	<p>A variety of formats and access points should be provided, this should include:</p> <ol style="list-style-type: none"> a. Signage/person at the entrance clearly explaining what to expect to ensure people of all ages feel prepared and empowered. b. Large print format for text. c. A sign language interpreter. d. A tactile model. e. Spaces within the room/ building that are calming and can be used as a breakout for those with SEN as required. f. Young people with SEND will have bespoke sessions. g. A non-digital information pack should be provided on arrival so in the instance that attendees may suddenly have to leave the event, for example, to fulfil caring obligations, they have another means to partake in consultations.
Age Appropriateness	<p>Pupils who will be engaging with the proposed developments might be direct applicants or younger pupils outside the schools' direct age range who may be looking to move to either special school in the future. Content should reflect the breadth of age ranges and consider tone, pace, language choices and the height of display boards and other forms of information appropriately.</p>

8.3 FLYERING AND NON-DIGITAL ENGAGEMENT

Overview	<p>There will be people who do not have digital access and do not have the time or means to attend an in-person event. A non-digital approach should therefore be offered in the form of information flyers and paper feedback forms. This should include the same information as the digital and in person content and should be distributed among local residents, families of children with SEN and disabilities in the borough and to existing SEN and mainstream schools in RBG. A small number of flyers should be circulated in the first instance with opportunities to request more in a measure to limit paper wastage.</p>
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Code of Practice Guidance	Measures in Place
Timing	Due to the nature of this engagement strategy, there are no time limitations on when people can access information once it has been distributed. Flyers should be made available in clear locations within existing school buildings or posted to relevant stakeholders. In all cases the end date of the consultation period should be made clear. If significant time is expected between the delivery of primary and secondary schools, flyers should be separated and targeted per provision.
Transport	No transport is required due to engagement approach.
Physical Accessibility	No physical access is required due to engagement approach, and this may remove some access barriers that people face regarding the digital and in-person events.
Accessibility of Content	Due to the written nature of content, there may be some access limitations if no interpretation is available. QR codes and website links could help direct readers to other communication methods better suited to them. The accessibility of these alternative options should be signposted clearly. Within the flyers and/or feedback forms, language should be clear and appropriate for the audience, with details on how to return any completed surveys being easily located and any delivery associated with this return being free of charge.
Age Appropriateness	It is recommended that the feedback survey has four formats with respondents choosing the one relevant to them. This should take the same format as the online engagement for as detailed in Section 8.1: Online engagement.

9.0 EQUALITIES IMPACTS

For the purposes of this assessment, sub-groups have been identified within certain protected characteristic group categories.

- Within ‘age’, all age ranges are considered, but specific sub-groups include children (aged under 16) and younger people (aged 16-19) who will be pupils at the school.
- Within ‘race’, all races and ethnicities are considered, but the sub-group of ethnic minorities is identified to refer to non-White British communities.
- Within ‘religion and belief’, all religious and belief groups are considered, but the term ‘Minority faith groups’ refers to religious groups who are not Christian (Buddhist, Hindu, Jewish, Muslim, Sikh, and ‘other’).
- Within ‘sexual orientation’ and ‘gender reassignment’, all sexual orientations and gender statuses are considered, but the ‘Lesbian, Gay, Bisexual, Transgender, Queer Plus’ (LGBTQ+) community is considered together.
- Within ‘sex’, the sub-groups of men and women are used.
- Within ‘pregnancy and maternity’, pregnant women are reported as a sub-group where the effect only relates to pregnancy.

9.1 PUPIL GROUPS

The following section assesses the equalities impacts on particular pupil groups who would use the school facilities proposed. This addresses the impacts surrounding the student stakeholder group only. All of these themes are viewed in light of the London Plan Policy D5 'Inclusive Design'⁶, which promotes inclusive spaces, considering London’s diverse population, facilitating places interaction and inclusion, and containing no disabling barriers or safety fears.

Age

The proposed primary, secondary and sixth form provision would impact, respectively, SEND pupils aged 4-11 years and SEND students aged 11 to 19 years. The provision of the new all-through special school would ensure that across the age spectrum, there are additional specialist spaces made available within the borough for children and young people with ASD and complex learning needs. This will aim to reduce the pressure for primary, secondary and sixth form specialist places and will enable more pupils between age four and 19 years to attend a good local school suitable for their needs. Appropriate measures will be put in place to ensure that all resident children and young people of the appropriate age are given fair opportunities to access the additional specialist places based on their needs that are assessed through their EHC Plan.

As part of the Partnership Strategy¹⁰ Royal Greenwich Children's Services are committed to preparing young people for adulthood. This includes increasing the opportunities available for

pupils to undertake apprenticeships and supported internships, as well as being integrated into local communities. The proposed provision of a secondary with sixth form special school facility in this area will provide opportunities for students to progress into adulthood in a school that is local to their home and in a familiar environment.

Therefore, this is considered to be a **Positive** impact for students.

Disability and Health

Royal Greenwich Children's Services have already identified a number of measures in the Accessibility Strategy²⁰ to ensure that no child is disadvantaged based on disability or health in accessing education. The policies outlined within this report and the Partnership Strategy¹⁰ will ensure that the proposed development meets the needs of all pupils within the relevant protected characteristic groups.

Inclusive access should also be a key consideration in the design of the new classrooms at Hargood Road and at the unspecified primary phase site to be located in the borough, to ensure that these sites are accessible for those with reduced mobility although the school sites will be designed for ambulant children and young people.

For children and young people with ASD and complex learning needs, the design of the special school should aim to reduce sensory stimulation. Where there are children with speech, language, and communication needs designs should include facilities that support pupils in communication through other means.

In relation to Hargood Road, BREEAM 'Excellent' is being targeted in the design. This supports users with disabilities and other health conditions as it ensures the creation of a healthy environment. This includes compliance with HEA 01-05, 07 and 28²² with implementation of solar shading on south facing facades and air flow monitoring to improve internal classroom environments, ensuring views out of spaces are maintained and creating access to the outdoors.

Fire Safety measures will also be considered within this development in relation to the needs of pupils. This addresses the fact that pupils with severe autism and SEMH may refuse to leave classrooms or follow designated means of escape, elevating the risk. Therefore, revised fire safety measures will be implemented to maximise the safety of pupils and staff and ensure no pupil group is negatively impacted by the design.²³

It is expected that most pupils would travel to school by RBG minibus provision, taxi (designated school transport) and private car, minimising the accessibility risks related to the site for all pupils regardless of disability. There could be flight risk from the future cohort, meaning they are at higher risk of running away, and therefore drop-off and collection need to occur on-site within a secure environment.

The proposed secondary with sixth form campus of the new all-through special school will provide bespoke education to meet the health and disability needs of secondary aged students across the

borough and it is expected that the proposed primary phase provision will similarly be fit for purpose. Due to the nature of the proposed school sites and the services they provide, the inclusion of those with disabilities is clearly and positively addressed. This is therefore considered a **Positive** impact for pupil groups.

Further measures surrounding the accessibility of the proposed developments, the creation of local employment and skills training and the opportunities to integrate with local communities have been assessed in detail in section 9.3. This references specific measures that support the students who will attend the new secondary Special School and sixth form provision considering their special education needs and impacts upon their overall health and wellbeing.

Gender Reassignment

It is considered that the delivery of a new all-through special school on two separate sites will not disadvantage children of any sex or gender including any children who may be interested in undergoing gender reassignment. Royal Greenwich Children's Services are committed to ensuring equality of education and opportunity for all, irrespective of gender or sex in line with the 2010 Equality Act.

It is noted that gender-neutral WCs are included within the proposed secondary with sixth form development at Hargood Road. This positively supports those who are interested in or have undergone gender reassignment to feel safe and supported in this environment.

Those who have undergone gender reassignment may be at greater risk of hate crimes or have greater fear of personal safety. CCTV will be used across the school grounds which can increase perceptions of safety and reduce crime.

Therefore, this is considered to have a **Neutral** impact on pupil groups.

Marriage and Civil Partnerships

Marriage and civil partnerships are not considered a relevant protected characteristic to the Special school developments given the age of the children. Due to the revised Marriage and Civil Partnership (Minimum Age) Act 2022²⁴ no pupils will legally be allowed to marry, even with parental consent unless they are over the age of 18.

Therefore, this is considered to have a **Neutral** impact on pupil groups.

Pregnancy and Maternity

Pregnancy and maternity are not considered relevant protected characteristics to the Special school developments given the age of the children. However, there may be pupils who have given birth or are parents. In this instance, the proposed developments are not expected to result in any prejudiced treatment or environments against those who are pregnant, breastfeeding or have recently given birth.

Therefore, this is considered to have a **Neutral** impact on pupil groups.

Race

It is considered that the delivery of the new all-through special school on two sites will not disadvantage children of any ethnicity. Data shows that the diversity of pupils is increasing in schools across the borough. The existing racial equality procedures of Royal Greenwich Children's Service, which are in line with the 2010 Equality Act, will continue to apply and help promote diversity and minimise racial discrimination.

Those from Black, Asian and Ethnic Minority backgrounds may be at greater risk of hate crimes or have greater fear of personal safety. CCTV will be used across the school grounds which can increase perceptions of safety and reduce crime.

Therefore, proposals are considered to have a **Neutral** impact on pupil groups.

Religion or Belief

It is considered that the delivery of the new all-through special school on two separate sites will not disadvantage children of any ethnicity. The existing religious equality procedures of The Royal Borough Greenwich Children's Service, which are in line with the 2010 Equality Act, will continue to apply and help promote diversity and minimise religious discrimination.

Pupils from minority faith groups may be at greater risk of hate crimes or have greater fear of personal safety. CCTV will be used across the school grounds which can increase perceptions of safety and reduce crime.

It is also recommended that as part of the detailed design stage a multi-faith space is provided or designated within the buildings to allow pupils to practice their faith during the school day.

Current design proposals are considered to have a **Neutral** impact on pupil groups and with the implementation of a multi-faith space would be considered **Positive**.

Sexual Orientation

It is considered that the delivery of the new all-through special school on two separate sites will not disadvantage children of any sexual orientation. Royal Greenwich Children's Service are committed to ensuring equality of education and opportunity for all, irrespective of sexual orientation in line with the 2010 Equality Act.

Therefore, this is considered to have a **Neutral** impact on pupil groups.

9.2 EXISTING EDUCATIONAL INSTITUTIONS

This assessment has also considered the impact of the proposed new all-through special school to be delivered on two separate sites within the borough on the wider educational provision within the areas.

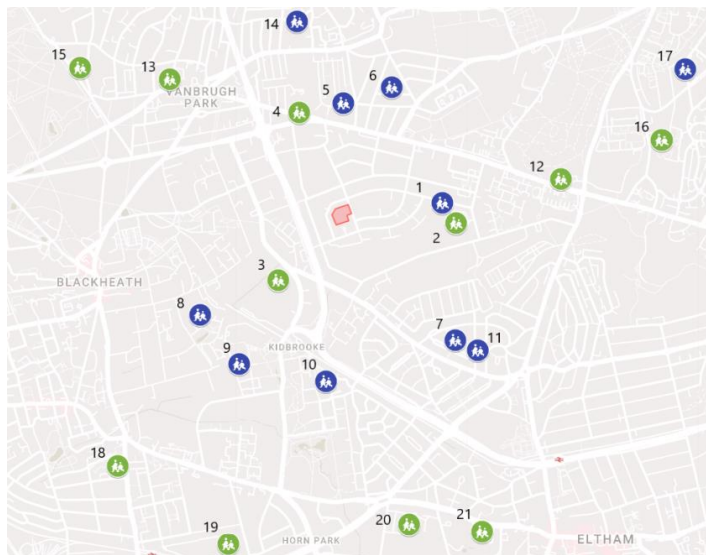
The provision of the new all-through special school will provide more suitable education provision for children and young people diagnosed with ASD and complex learning needs who would otherwise be placed in local mainstream schools. It will ensure that those pupils who require it are receiving specialist support in an appropriate setting for ASD and complex learning needs.

The Department of Education (DFE) states that statutory walking distances are 2 miles for children under 8 years and 3 miles for children aged 8 and over. For the purpose of this assessment, and due to the urban location of the site, a 2-mile (3km) radius has been used when considering 'local' institutions. This has been widened to 8km for SEND schools which equates to approximate 20 minutes by private vehicle and 45 minutes by public transport. As Hargood Road site is confirmed and the other is not, we will use the former for this assessment.

Mainstream Schools

The following map highlights the existing education facilities within a 3km radius of the proposed Hargood Road site for the proposed secondary with sixth form campus. Primary schools are shown in blue and secondary schools in green.

Figure 9.1 Existing Local Schools (3km)



Source: [mygooglemaps.com](https://www.google.com/maps)

Across the mainstream primary schools there is currently capacity for 548 pupils based on 2021/22 school capacity data²⁵. Within the local mainstream secondary schools there is currently capacity for 1302 pupils.

Table 9.1 Existing Schools Capacity

Ref.	School	Distance (km)	School places	Pupils on Roll	Spare capacity	Surplus capacity (%)
1	Kidbrooke Park Primary School	750m	420	367	53	14.4
2	The Halley Academy	1	1479	894	585	65.4
3	Thomas Tallis School	1.1	1908	2062	-154	-7.5
4	Leigh Academy Blackheath	1	1150	719	431	59.9
5	Cherry Orchard Primary School	1.2	210	198	12	6.1
6	Charlton Manor Primary School	1.2	420	399	21	5.3
7	Henwick Primary School	1.8	349	298	51	17.1
8	Brooklands Primary School	2	210	184	26	14.1
9	Wingfield Primary School	1.8	630	356	274	77.0
10	Holy Family Primary School	1.7	420	389	31	8.0
11	St Thomas More Catholic Primary School	1.9	195	203	-8	-3.9
12	Ark Greenwich Free School	1.8	700	600	100	16.7
13	Blackheath High School GDST	1.9	943	568	375	66.0
14	Our Lady of Grace Catholic Primary School	2	420	357	63	17.6
15	The John Roan School	2.7	1352	1207	145	12.0

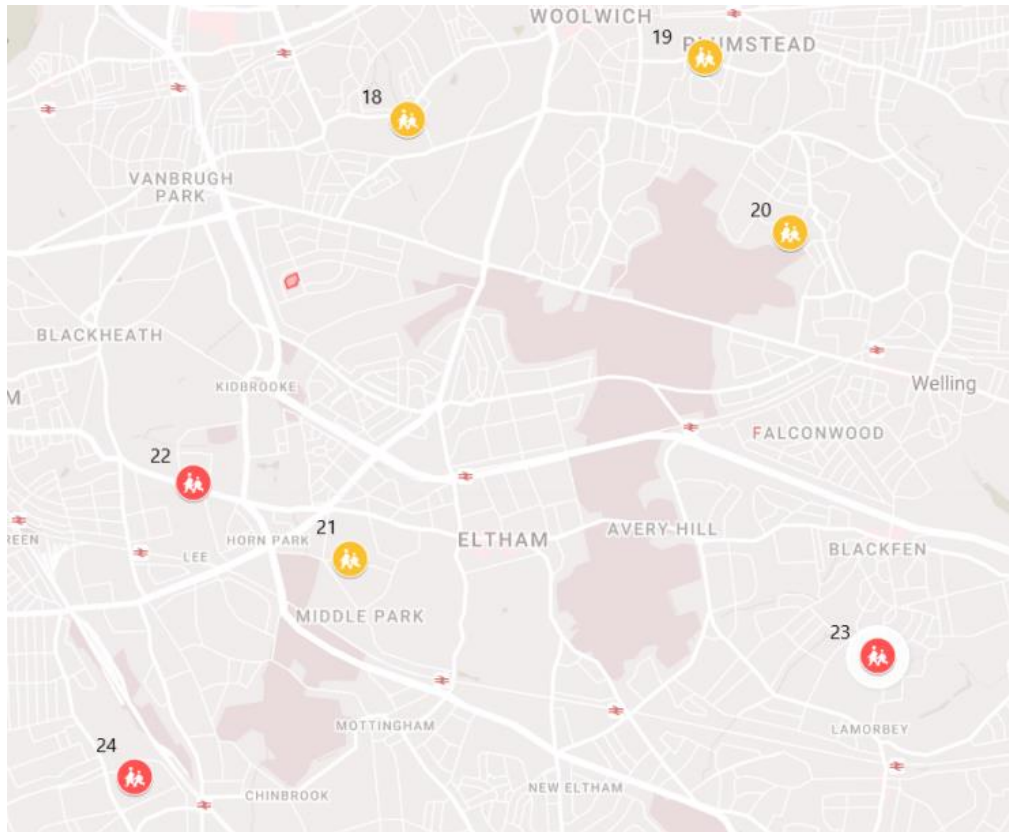
Ref.	School	Distance (km)	School places	Pupils on Roll	Spare capacity	Surplus capacity (%)
16	Shooters Hill Sixth Form College	2.8	1045	1151	-106	-9.2
17	Eglinton Primary School	3	420	383	37	9.7
18	Abbey Manor College	3	136	No data available		
19	Colfe's School	3	96	74	22	29.7
20	Harris Academy Greenwich	3	1150	1181	-31	-2.6
21	Eltham Hill School	3	1049	1114	-65	-5.8

The provision of a new special school is therefore considered to have a **Positive** impact in the long term on local mainstream education institutions. This will allow pupils who require additional support to move into specialist education.

SEN Schools

The following map shows local SEND schools. Four of these are operated by the RBG and are shown in orange, including two primary schools. Three are operated by others and are shown in red.

Figure 9.2 Existing SEN Schools (8km)



Source: mygooglemaps.com

Data released by the Department for Education in June 2023²⁶ shows that 564 pupils within Greenwich attend a state funded special school providing them with required SEN and/or EHC support.

In addition to this there are however, 7,912 additional pupils requiring SEN support, or who have EHC Plans, who are currently educated within mainstream state funded schools across the borough. This comprises 4,771 primary school pupils and 3,141 secondary school students.

Within state funded primary schools, the greatest proportion of EHC Plans and SEN support is for pupils in year 6. This can be broken down as follows: 17.9% of EHC Plans within primary level education are associated with children in Year 6, while similarly, 15.2% of SEN support needs within primary school pupils are also in year 6.

Of those with SEN support and EHC Plans within state funded secondary schools, the greatest proportion with EHC Plans are in year 10 (23.5%) and the greatest proportion with SEN support are in year 8 (19.3%).

The table below summarises available data about the SEN school provision within 8km of the site.

Table 9.2 Existing SEN Schools Capacity

Ref.	School	Distance (km)	School places	Designation	Age Range
18	Charlton Park Academy	2.1	209	Severe/ Complex Learning needs	11-19 years
19	Waterside Primary	4.5	40	Social, Emotional and Mental Health (SEMH)	5-11 years
20	Willow Dene Primary	6.0	200 + 16 temps	Severe/ Complex Learning needs	3- 11 years
	Willow Dene Secondary	6.0	40	Severe/ Complex Learning needs	11 - 16 years
21	Kings Oak School	3.2	40 (Boys only)	Social, Emotional and Mental Health (SEMH)	11-16
22	Riverstone School (Independent)	2.6	214	Range of SEND support	1- 19
23	Marlborough School (Bexley LA)	7.4	76	All students have EHC Plans	11 - 19
24	Drumbeat School (Lewisham LA)	5.6	162	Community Special School/ ASD	4 - 19
	Total SEN Places		997		

The table summarises that there are currently 997 SEND places within 8km of the Hargood Road site. Ofsted reports can be used to determine the number of sixth form places within these schools. Latest data shows that of these 997 places, 202 are for students are 16 and over. The table demonstrates that there is currently only one school in RBG (Charlton Park Academy)

providing for students aged 16 and over and students are more likely to be offered places within the borough they live in.

Based on DfE data which shows that 7,912 pupils with RBG may benefit from a new SEND school place, there is pressure within the local area. To support some of this need, Charlton Park Academy provides 225 places for students aged 11-19 with severe and complex special educational needs, Willow Dene school provides 272 places for pupils aged 2-16 with severe and complex special educational needs, Kings Park campus (managed by Newhaven School) provides 55 places for students aged 11-18 with Autistic Spectrum Disorder and mental health/behaviour challenges. This still represents under provision and trends show this is set to increase.

Therefore, the provision of a new all-through special school over two sites is considered to have a long-term **Positive** impact on existing educational institutions. This will help to relieve pressures on services and ensure that all children and young people have access to appropriate and supportive specialist places within the borough.

9.3 WIDER COMMUNITY, DEPRIVATION AND SOCIO-ECONOMIC IMPACTS

The proposed developments will have wider socio-economic and health equalities impacts, which are considered to have a potential impact on the protected characteristic of the identified stakeholder groups under the Equalities Act. This section addresses the impact on wider stakeholder groups including staff and local communities and residents.

Assessment has been carried out in relation to the proposed secondary with sixth form development at Hargood Road as part of the new all-through special school with measures for the primary phase site remaining indicative at the time of writing. It is understood that similar measures will be undertaken once this site has been confirmed.

Healthy Places

The creation of healthy places is key to Local Plan Policy CH2 which focuses on enabling residents to lead more healthy and active lifestyles, and address health inequalities.

The new special schools will be expected to make available their facilities for community use where possible. The schools will offer community engagement and use of the building and facilities once fully open. The impact on stakeholders including local residents, families of children attending the proposed Special schools, and staff have been assessed below.

Construction

In order to mitigate adverse health impacts during construction at Hargood Road, a number of measures will be taken. An Air Quality Test will be carried out at RIBA Stage 3 in line with London Plan⁶ Policy SI 1 and should provide mitigation approaches. These will assist in tackling air pollution and improving air quality and the health and well-being of its people. Poor air quality is likely to have greater adverse impacts on **older people, people with disabilities and pregnant women** who are at greater risk.

NO₂ is largely caused by transport and power generation. The primary health impact of long-term exposure is reduced life expectancy. Those with **pre-existing health conditions**, including **pregnancy**, may be particularly vulnerable if they live or work adjacent to major trunk roads and high traffic areas. The sites' location is in close proximity to the A2 therefore must be considered in terms of reduction of pollution and encouraging active travel measures. Addressing health implications such as air quality is in direct response to The London Plan Policy GG3⁶ which focuses on creating a healthy city through promoting active lifestyles, improving air quality, and addressing detriments to health.

The impact on the health of local residents is considered to be **Negative** in the short-term during the construction process.

Operation

During operation, a number of measures will be taken to ensure that the internal spaces and design of the building supports healthy communities. This includes the pupils and staff within the space, as well as the wider impact on local residents, in particular in relation to noise, energy generation and air quality strategies.

The design of the secondary with sixth form campus of the all-through special school aims to reduce the wider environmental impact through adopting low, zero-carbon and renewable strategies. This will benefit the wider community in helping the borough to reduce carbon emissions and create a safe environment in the long term. The design includes measures to minimise energy consumption through passive design techniques, to maximise daylight whilst minimising unwanted solar gain, to create thermally and acoustically comfortable environments to support productivity and attainment, to enhance water conservation and to have a level of flexibility in the building to adapt to future scenarios.

A noise exposure survey has been carried out by Clement Acoustics. This looked at internal and external noise levels and determined that they were suitable for a classroom environment. This is of particularly high importance in this setting as the proposed development is aimed at supporting pupils with **ASD** which often leads to heightened sensitivity to noise (also known as hyperacusis). Ensuring noise is minimised will ensure that no building users are adversely impacted by the design.

A Flood Risk Assessment has also been produced by Herrington Consulting Limited which assessed the risk level of the development as Low. There is not considered to be any associative negative impacts on protected characteristics groups or vulnerable communities within the local area.

In relation to healthy places, it is considered that there will be a **Positive** impact on the health of the wider community, staff, and pupils in the long-term.

Local Employment and Skills

The development of a new all-through special school will generate construction and operational jobs including new teaching, support, and maintenance roles.

Construction

Development can act as a means of promoting economic growth and supporting local job creation. For example, the use of local suppliers and trade during the construction work will improve the business outcomes for local trades. Based on the estimated construction costs it has been calculated that 74 -79 full time employment (FTE) opportunities will be created by the proposed development at Hargood Road. This is based on a construction value of between £17m-£18m using the Annual Business Survey²⁷ construction sector data to estimate the amount of construction expenditure required to support a construction job for a year as £227,067. The recruitment for these roles and construction contracts should not discriminate based on any of

the protected characteristics. By using a Considerate Constructors Scheme²⁸ the applicant can ensure that best practice measures are in place.

Construction can help **younger people** access skills and training opportunities through internships and schools' workshops offered by contractors and developers on site. The use of local supply chains will also increase local income and could have impacts on local households, benefitting the Income Deprivation Affecting Children Index and the Income Deprivation Affecting Older People Index, where the site currently sits within the 50% least and 40% most deprived for these categories, respectively.

It should be confirmed with the chosen contractor that measures will be taken to support people of all ages into work on site. This is in line with London Plan⁸ Policy E11 and the Mayor's Equality, Diversity and Inclusion Strategy⁷ which focuses on working with employers, education and skills providers so that as many Londoners as possible can participate in, and benefit from, employment opportunities in London. This includes providing employability and skills support for those who are disadvantaged in London's skills, enterprise, and jobs market, including **older people**, people from the **LGBTQI+ community** and people of **ethnic minority** backgrounds.

Therefore, this is considered to have a **Neutral** impact on the protected characteristics of wider communities and local residents and a **Positive** impact on socio-economic conditions through job creation.

For the primary phase site, it is likely that the impacts will be similar during construction.

Operation

During operation of the all-through special school there will be a number of jobs generated on each site.

For the secondary with sixth form campus at Hargood Road, each class is intended to have one teacher, and one teaching assistant per two students. In some instances, one-to-one teaching will be in place. The school will therefore generate a minimum of 64 teaching assistant roles and 16 teacher positions. There will also be several support services roles including operational and administrative staff.

According to the 2021 Census, 9.2% of the population over 16 within RBG work in Education. In April 2023, 5% of the population with RBG were claiming contribution-based Jobseeker's Allowance and/ or Universal Credit²⁹. This suggests there are a number of people within the borough who would benefit from the creation of new local jobs.

Teachers and other staff appointed for the maintenance and running of the proposed developments will not be discriminated against in any form under The Department for Education's Public Sector Equality Duty, which aligns with the Equality Act. In addition, staff may be supported by one of the Department for Education's Core Inclusion Networks which support protected characteristics groups including a **50+** group, **Black, Asian and minority ethnic** group, **Christian** group, **Departmental disability** group, **Fertility** group, **Hindu** group,

Interfaith group, LGBT+ group, Long COVID group, Menopause group, Neurodivergence group, Parents group, Women and Women of colour groups.

Therefore, this is considered to have a **Neutral** impact on the protected characteristics of wider communities and a **Positive** impact on socio-economic conditions for staff through job creation.

For the primary phase site, it is likely that the impacts will be similar during operation.

Community Facilities and Social Cohesion

Construction

The redevelopment process of the Hargood Road site has already involved a large amount of demolition in close proximity to a residential area. The construction of the new school building for secondary with sixth form specialist provision will also impact on the local community and could lead to the temporary loss of infrastructure such as transport routes.

This can lead to increased stress and anxiety in all people groups; and loneliness and isolation in **older people** which can turn to negative health outcomes such as poor mental health and obesity. **Disabled people** and **pregnant women** may also experience negative health impacts from increase mobility obstacles, including increased stress and anxiety.

Construction is also likely to increase noise disturbance and impact air quality in the short-term. This may have greater impacts on those with poor physical health or disabilities.

Therefore, construction associated with the delivery of Hargood Road is considered to have a **Negative** impact on the protected characteristics of wider communities as it could specifically impact health and the ability of these individuals to participate in the community in the short-term.

It is anticipated there will be a similar impact for the construction of the primary phase site.

Operation

Redevelopment of vacant land, as in the case of Hargood Road, can however, facilitate improved connectivity between communities and places of education. This can help address issues of inequality and improve social mobility of those attending or working on a site in the long-term. This type of redevelopment can also improve local crime statistics and perceptions of safety.

Social contact and proposed out-of-classroom learning further improve the wellbeing of **children** and give opportunities to learn new skills. This is in line with the Local Plan⁸ Policies CH1 and CH2 which focus on bringing communities together. In addition, it is recommended that facilities could be shared with the wider community outside of school hours. This could include the hire of the main and smaller halls on the Hargood Road site.

The proposed secondary with sixth form special school facility also offers opportunity for improved outlook from homes in comparison to current vacant land as well as activating the site

along the Hargood Road boundary which has the potential of increasing connectivity between the school and local community. Social contact is especially important for the health and wellbeing of **older people**.

In sum, it is considered the development will have a long-term **Positive** impact on the protected characteristics of wider communities through improved site conditions and a **Positive** impact on socio-economic outcomes through increased cohesion despite the short-term construction.

For the primary site, it is anticipated the impacts will be similar with similar possibilities to mitigate impact by providing additional community space and social cohesion. By having two smaller sites for primary and secondary sixth form phase, instead of one large one, also doubles the opportunity for increased impacts.

Open Space and Play Space

The Hargood Road site does not directly impact upon open space and the area is well serviced by Kidbrooke Playing Fields, Marathon Playing Fields and a recreation ground accessed off Begbie and Hervey Road to the north of the site. These are protected as part of Local Plan Policy OS1⁸. The improvement of green infrastructure on site has still been considered in terms of the protected characteristic groups.

Construction

Due to the fact no open spaces are accessed immediately adjacent to the site, the proposed development at Hargood Road is unlikely to result in changes to the listed open spaces. In addition, the fact that the scope of the Hargood Road project has been reduced to provide just the secondary and sixth form phases of the all-through special school with the primary phase now being developed on an alternative site will provide some improvements on open space and place space for the school and the wider community in terms of the density of the site.

Therefore, the proposed development at Hargood Road is considered to have a **Neutral** impact on the protected characteristics of wider communities.

Operation

Green space can have a positive role in a child's cognitive development, their wellbeing, and is linked to lower BMIs. Access to green space has also been shown to have positive health benefits for **disabled people**, and people with autism or learning difficulties. While the green space on the Hargood Road site will not be accessible to the wider community, it will have a long-term **Positive** benefit for the children, staff, and families of those who attend the Special School.

An area of soft landscape is proposed adjacent to the boundaries to the north, south and west which will provide a series of green spaces for use by the school. This will include formal and informal play areas, a habitat zone, a sensory garden, and a forest school. Outlook onto green spaces will have a positive impact for local residents, including those at greater risk of poor mental

health, older people and those with mobility issues who may struggle to physically access green spaces.

Accessibility

Accessibility has been assessed in two measures, firstly, relating to the implications of changes to routes and wayfinding during construction and secondly, in relation to the accessibility of the Hargood Road development. This is particularly viewed in reference to the RBG Accessibility Strategy for Education Settings²⁰.

Construction

Evidence has indicated that during construction the accessibility and people's mobility within the local area can be affected. In particular, construction can lead to increased traffic in the local area; reducing parking (construction vehicles and subcontractors parking); construction activities blocking access to homes, bus stops and pavements and safe routes; as well in relation to its effects on wayfinding.

During construction there may be adverse impacts on some protected characteristic groups in terms of safe movement around the site. Measures should be taken to ensure that all pavements remain accessible and wide enough for **wheelchair users** and **pushchairs** to travel safely along routes. If sections of footpath are closed temporarily or blocked by vehicles, safe crossing points should be provided with clear signage and pedestrian priority in place.

Children who cannot move about safely and independently on foot and bicycle often become less physically active, reducing opportunities for children to develop certain cognitive, motor, and physical skills – as well as contributing towards childhood obesity risks. Similarly changes in access routes can impact **older people**, **pregnant women**, and those with a **disability** due to the uncertainty of travel routes and longer journey times. This may impede people from these groups from accessing adjacent public open space and play facilities as well as community and social infrastructure.

Therefore, this is considered to have a **Negative** impact on the protected characteristics of local residents in the short-term.

This could be mitigated through a construction management plan and implementation of clear wayfinding measures. Announcements surrounding changes in access routes should be made in advance and published clearly by multiple means within the local community.

Operation

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

The Hargood Road site sits within the 40% most deprived areas within the Living Environment Domain. The redevelopment of the site will aim to improve the education provision for people with disabilities in the local area through education. This includes active travel measures to support walking or cycling to school as well as fully accessible parking spaces. Internally the buildings support users with a variety of mobility, physical and mental impairments through the design of spaces.

Transport facilities and services need to be planned for ease of use and convenience for pupils who will be attending the school from across the borough. It is intended that staff will be encouraged to use public transport or cycle to minimise the on-site requirement for car parking. The nearest bus stop is Hargood Road Stop P (0.2 miles from the site). The site does not sit in proximity to the London Underground network and the site has a Public Transport Access Level (PTAL)³⁰ rating of 1a which is the worst condition.

The nearest National Rail station is Kidbrooke which is 960m to the south-east of the site. A number of measures have been considered to ease access concerns for the site as well as reduce the parking impact on local street networks. Car sharing between staff will be encouraged and the RBG suggests that a minibus system for staff, which would allow them to park remotely, may assist with accessibility of the site.

Transport, planning and highways advice has been offered by Robert West. In relation to accessibility of the site and maintaining clear highways for other local residents, a number of steps are proposed. This includes provision of a recessed layby that will allow for vehicles waiting to enter the site and avoid queuing or waiting off the local highway network. Additionally, a footway will be diverted and drop kerb crossing points will be provided with tactile paving where appropriate.

Particular care also needs to be taken to provide suitable parking arrangements (car or bike) for disabled users.

It is considered unlikely that pupils will drive themselves to school and provision has been made on the assumption that the majority of pupils will arrive via drop off by parents or carers. While some pupils pose a flight risk and will require secure drop-off and collection from the school, there may be other pupils who are able to cycle to the school with traditional or adapted cycles.

Therefore, on-site parking for these bikes will make this an accessible option, increasing activity levels and improving pupils' sense of independence in line with the RBG Accessibility Strategy²⁰ goal to remove barriers to participation and encourage children and young people. This is proposed at a quantum of one cycle parking space per 16 pupils and one space per FTE staff member. A new route is also proposed from Hargood Road to the school entrance which will improve the experience for pedestrians through landscaped areas and away from traffic where possible.

It is therefore considered that the new secondary with sixth form campus will have a **Positive** impact on the protected characteristics of pupils and staff, as well as ensuring retained access to street parking and pavements for local residents.

Crime and Safety

It has been suggested that fear of crime can contribute to social isolation, particularly for vulnerable groups such as women, older people, children, and ethnic minority groups. Community safety and perception of safety is a particular concern for some **Black and Minority Ethnic** groups and needs to be considered in an area where 42% of residents are from the global majority. The recent reported increases in hate crime involving **lesbian, gay, bisexual, transgender, and queer (LGBTQ+)** populations also emphasises the importance of addressing the safety concerns for this group. Reducing potential for crime can affect those more likely to fear crime or be a victim or witness of crime.

Construction

In the lead up to the redevelopment of Hargood Road there has been large scale demolition on site. The vacant nature of the site could attract unwanted activity including anti-social behaviour and crime. During the redevelopment process there are likely to be areas of land sectioned off and used for storage of goods and machinery. Hoardings and narrow routes may be used on site to direct pedestrians to allow continued access to local streets, public transport routes and businesses. This can affect those who are more likely to be a victim or witness of crime or those who are more fearful of crime including local residents.

The most significant impacts will be for those who have undergone **gender reassignment, women, Black and Minority Ethnic groups and LGBTQI+ people**. These impacts include:

- fear of exclusion, violence and impacts on mental wellbeing as a result of increased fear; and
- Impacts on the use of buildings and services due to designs not being suitable for specific groups needs or spaces feeling inaccessible to certain people.

Considering the current level of street lighting and overlooking from residential areas across the main site access points, it is considered that the impacts on safety will be short-term. Regular changes to the street layout and potential hoardings impacting continuous street lighting could result in opportunistic crime and this is therefore considered to have a **Negative** impact in the short-term on the safety of local residents.

Operation

The RBG Local Plan⁸ policy CH1 focuses on creating safe streets and providing measures to help reduce crime levels and increase natural surveillance. This is further supported by the Greenwich Community Safety Plan³¹ and Policy 7.3 of the London Plan⁶ provides detail on designing out

crime. This is achieved on site through creation of overlooked places and natural surveillance, pedestrian routes, footpaths and cycle paths and clear and uniform signage that helps people move around, making the site safer and more attractive for users.

This assessment concludes that in operation, the design of Hargood Road and the primary phase site responds to these requirements through access control points at all site entrances, audio and video entry to all pedestrian and vehicular access points, full CCTV coverage of the school grounds and higher fencing on the site boundary secure line, which may include visual screening. This is particularly important in relation to the safety of SEND pupils who due to their age, mobility and cognitive abilities can be particularly vulnerable.

As the Hargood Road site is currently vacant, the redevelopment and activation of the space will increase the natural surveillance and will likely drive down crime. Within Greenwich O22A the crime levels are relatively low with the greatest levels of crime being violent crimes followed by anti-social behaviour.³² Violent crimes are more likely to be related to the protected characteristic groups. Redevelopment, introduction of safety measures and increased footfall could result in a reduction of personal attacks and crime.

The Proposed Development will have a **Neutral** impact on the protected characteristics of residents, communities, and staff.

It is recommended that Secure by Design principals are carried out in relation to the designs of both primary and secondary schools, and that an analysis is carried out on the proposed designs to highlight any further risks or safety concerns. Implementation of recommendations within the Secure by Design assessment will ensure levels of crime and fear of crime are reduced for all protected characteristic groups in and around the sites.

10.0 MITIGATION AND MONITORING

The following actions should be taken to ensure the proposed buildings positively impact all users and stakeholders based on each of the protected characteristic groups.

Age

- Adherence to CMP, noise, and dust suppression strategies during construction to minimise health and access risks;
- Ensure end users adhere to the Equalities Act and do not discriminate based on age; and
- During construction work with the local residents to provide a 'look ahead' of planned works and deliveries to avoid unexpected disruptions to accessing local services, footways, or street parking.

Disability and Health

- Adherence to CMP during construction to minimise access disruptions and ensure safe access routes;
- Fulfil BREEAM 'Excellent' requirements in particular in relation to design for health and wellbeing; and
- Ensure end users adhere to the Equalities Act and do not discriminate based on disability.

As a result of the assessment, it is also recommended that RBG works with Transport for London to increase public transport access to the site, allowing pupils the opportunity to travel independently and safely where possible and appropriate.

Sex, Sexual orientation, and Gender Reassignment

- Application of Secure by Design principals and liaison with local police/ crime prevention officers; and
- Ensure end users adhere to the Equalities Act and do not discriminate based on sex, sexual orientation, and gender reassignment.

Pregnancy and Maternity

- Adherence to CMP during construction to minimise access disruptions and ensure safe access routes; and
- Ensure end users adhere to the Equalities Act and do not discriminate based on pregnancy and maternity.

Race

- Application of Secure by Design principals and liaison with local police/ crime prevention officers;

- Ensure end users adhere to the Equalities Act and do not discriminate based on race; and
- Provide a Construction Employment Plan to promote diversity within workforce including apprenticeships and training programmes.

Religion and Belief

- Application of Secure by Design principals and liaison with local police/ crime prevention officers;
- Ensure end users adhere to the Equalities Act and do not discriminate based on religion or belief;
- Provide spaces for construction workers and end building users to practice faith either on site or off site; and
- Provide a Construction Employment Plan to promote diversity within workforce including apprenticeships and training programmes.

As a result of the assessment, it is also recommended that a faith space is provided within the developed designs to allow pupils from different faith backgrounds to practice their faith during the school day.

11.0 SUMMARY AND CONCLUSIONS

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

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

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

Overall, the proposed developments are **not considered to have any negative impacts** on the equalities of different protected groups. Potential impacts affecting vulnerable groups relating to the protected characteristics defined in the Equality Act 2010 are summarised in Table 11.1 along with specific reporting and monitoring requirements for future design stages. Therefore, no further mitigation is required, beyond measures already proposed and identified in this assessment.

Inclusive design represents a key consideration of the Proposed Developments and Equalities Impacts will continue to be considered as part of designs and community engagement approach for the detailed design stages of outline elements.

Table 11.1 Equalities Impact Summary

Vulnerable Group	Impacts	Ongoing Reporting and Monitoring requirements
Children and Young People	Inclusive and accessible design principles have been, or are expected to be, applied to ensure that any person can access and utilise the proposed developments with ease. The new all-through special school specifically caters for young people between the age of 4 and 19 years.	Ensure the chosen school operator adheres with the equality strategy of the RBG and those set out in the report.
Older people	Measures have been put in place to ensure older people within the community are not adversely impacted in terms of health, access to local social infrastructure or levels of crime.	Ensure construction management and traffic plans are put in place to minimise disruption to local footpaths and highways. Provide 'look ahead' plan for local residents.
Disabled People	The new all-through special school specifically caters for children and young people with ASD and complex learning needs. The facilities will positively impact their learning outcomes and skills development. The design for both sites should not adversely impact people with SEND within the wider community in terms of health, access, and employment opportunities.	Work with TfL to increase public transport access to the site and ensure maximum take-up of staff and pupil minibus service.
Ethnic Minority people	Inclusive design principles will be applied to ensure that pupils of any ethnicity will be able to access and utilise the proposed developments with ease. Secure by design principles will also be put in place to ensure people feel safe within and in the areas surrounding the development to prevent crimes including those related to race.	Ensure Secure by Design principals are in place and measures are taken to design out risk of crime during construction and operation.
Pregnancy and Maternity	Accessible design principles ensure easy access to the surrounding public realm/ streets for those who are pregnant.	None required

Vulnerable Group	Impacts	Ongoing Reporting and Monitoring requirements
Religious groups, particularly Minority Ethnic Groups	Inclusive design principles will be applied to ensure that pupils of any religion or belief can access and utilise the proposed developments with ease. Safety and security measures are in place to ensure everyone feels safe moving around both school sites and wider local areas, aiming to create cohesion between all residents.	Provide a faith space within the developed design proposals.
LGBTQ+ People	Inclusive design principles have been applied to ensure that pupils of any sexual orientation can access and utilise the proposed developments with ease. Secure by design principles will be put in place to ensure people feel safe within and in the areas surrounding the developments to prevent crimes including those relating to sexual orientation.	Ensure Secure by Design principals are in place and measures are taken to design out risk of crime during construction and operation

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