


EQUALITY ANALYSIS (EA) TEMPLATE

Decision

IH approved on 14th December 2022

Date

 Latest revision of CoL responses
was on 14th December 2022



What is the Public Sector Equality Duty (PSED)?

The Public Sector Equality Duty (PSED) is set out in the Equality Act 2010 (s.149). This requires public authorities, in the exercise of their functions, to have 'due regard' to the need to:

- Eliminate discrimination, harassment and victimisation
- Advance equality of opportunity between people who share a protected characteristic and those who do not, and
- Foster good relations between people who share a protected characteristic and those who do not

The characteristics protected by the Equality Act 2010 are:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex (gender)
- Sexual orientation

What is due regard?

- It involves considering the aims of the duty in a way that is proportionate to the issue at hand
- Ensuring real consideration is given to the aims and the impact of policies with rigour and with an open mind in such a way that influences the final decision

The general equality duty does not specify how public authorities should analyse the effect of their business activities on different groups of people. However, case law has established that equality analysis is an important way public authorities can demonstrate that they are meeting the requirements.

Case law has established the following principles apply to the PSED:

- **Knowledge** – the need to be aware of the requirements of the Equality Duty with a conscious approach and state of mind.
- **Sufficient Information** – must be made available to the decision maker.
- **Timeliness** – the Duty must be complied with before and at the time that a particular policy is under consideration or decision is taken not after it has been taken.
- **Real consideration** – consideration must form an integral part of the decision-making process. It is not a matter of box-ticking; it must be exercised in substance, with rigour and with an open mind in such a way that it influences the final decision.
- **Sufficient information** – the decision maker must consider what information he or she has and what further information may be needed in order to give proper consideration to the Equality Duty.
- **No delegation** – public bodies are responsible for ensuring that any third parties which exercise functions on their behalf are capable of complying with the Equality Duty, are required to comply with it, and that they do so in practice. It is a duty that cannot be delegated.
- **Review** – the duty is not only applied when a policy is developed and decided upon, but also when it is implemented and reviewed.

- Due regard should be given before and during policy formation and when a decision is taken including cross cutting ones as the impact can be cumulative.

What is an Equality Analysis (EA)?

An equality analysis is a risk assessment tool that examines whether different groups of people are, or could be, disadvantaged by service provision and decisions made. It involves using quality information, and the results of any engagement or consultation with particular reference to the protected characteristics to understand the actual effect or the potential impact of policy and decision making decisions taken.

The equality analysis should be conducted at the outset of a project and should inform policy formulation/proposals. It cannot be left until the end of the process.

The purpose of the equality analysis process is to:

- Identify unintended consequences and mitigate against them as far as possible, and
- Actively consider ways to advance equality and foster good relations.

The objectives of the equality analysis are to:

- Identify opportunities for action to be taken to advance quality of opportunity in the widest sense;
- Try and anticipate the requirements of all service users potentially impacted;
- Find out whether or not proposals can or do have any negative impact on any particular group or community and to find ways to avoid or minimise them;
- Integrate equality diversity and inclusion considerations into the everyday business and enhance service planning;
- Improve the reputation of the City Corporation as an organisation that listens to all of its communities;
- Encourage greater openness and public involvement.

However, there is no requirement to:

- Produce an equality analysis or an equality impact assessment
- Indiscriminately collect diversity data where equalities issues are not significant
- Publish lengthy documents to show compliance
- Treat everyone the same. Rather, it requires public bodies to think about people's different needs and how these can be met
- Make service homogenous or to try to remove or ignore differences between people.

An equality analysis should indicate improvements in the way policy and services are formulated. Even modest changes that lead to service improvements are important. In it is not possible to mitigate against any identified negative impact, then clear justification should be provided for this.

By undertaking an equality analysis, officers will be able to:

- Explore the potential impact of proposals before implementation and improve them by eliminating any adverse effects and increasing the positive effects for equality groups
- Contribute to community cohesion by identifying opportunities to foster good relations between different groups
- Target resource more effectively
- Identify direct or indirect discrimination in current policies and services and improve them by removing or reducing barriers to equality

How to demonstrate compliance

The Key point about demonstrating compliance with the duty are to:

- Collate sufficient evidence to determine whether changes being considered will have a potential impact on different groups.
- Ensure decision makers are aware of the analysis that has been undertaken and what conclusions have been reached on the possible implications.
- Keep adequate records of the full decision making process.

In addition to the protected groups, it may be relevant to consider the impact of a policy, decision or service on other disadvantaged groups that do not readily fall within the protected characteristics, such as children in care, people who are affected by socio-economic disadvantage or who experience significant exclusion or isolation because of poverty or income, education, locality, social class or poor health, ex-offenders, asylum seekers, people who are unemployed, homeless or on a low income.

Complying with the Equality Duty may involve treating some people better than others, as far as this is allowed by discrimination law. For example, it may involve making use of an exception or the positive action provisions in order to provide a service in a way which is appropriate for people who share a protected characteristic – such as providing computer training to older people to help them access information and services.

Taking account of disabled people's disabilities

The Equality Duty also explicitly recognises that disabled people's needs may be different from those of non-disabled people. Public bodies should therefore take account of disabled people's impairments when making decisions about policies or services. This might mean making reasonable adjustments or treating disabled people better than non-disabled people in order to meet their needs.

Deciding what needs to be assessed

The following questions can help determine relevance to equality:

- Does the policy affect service users, employees or the wider community, including City businesses?
- How many people are affected and how significant is the impact on them?
- Is it likely to affect people with particular protected characteristics differently?
- Is it a major policy, significantly affecting how functions are delivered?
- Will the policy have a significant impact on how other organisations operate in terms of equality?
- Does the policy relate to functions that engagement has identified as being important to people with particular protected characteristics?
- Does the policy relate to an area with known inequalities?
- Does the policy relate to any equality objectives that have been set?

Consider:

- How the aims of the policy relate to equality.
- Which aspects of the policy are most relevant to equality?

- Aims of the general equality duty and which protected characteristics the policy is most relevant to.

If it is not clear if a policy or decision needs to be assessed through an equality analysis, a Test of Relevance screening tool has been designed to assist officers in determining whether or not a policy or decision will benefit from a full equality analysis.

Completing the Test of Relevance screening also provides a formal record of decision making and reasoning. It should be noted that the PSED continues up to and after the final decision is taken and so any Test of Relevance and/or full Equality Analysis should be reviewed and evidenced again if there is a change in strategy or decision.

Role of the assessor

An assessor's role is to make sure that an appropriate analysis is undertaken. This can be achieved by making sure that the analysis is documented by focussing on identifying the real impact of the decision and set out any mitigation or improvements that can be delivered where necessary.

Who else is involved?

Chief Officers are responsible for overseeing the equality analysis proves within departments to ensure that equality analysis exercises are conducted according to the agreed format and to a consistent standard. Departmental equality representatives are key people to consult when undertaking an equality analysis.

Depending on the subject it may be helpful and easier to involve others. Input from another service area or from a related area might bring a fresh perspective and challenge aspects differently.

In addition, those working in the customer facing roles will have a particularly helpful perspective. Some proposals will be cross-departmental and need a joint approach to the equality analysis.

How to carry out an Equality Analysis (EA)

There are five stages to completing an Equality Analysis, which are outlined in detail in the Equality Analysis toolkit and flowchart:

2.1 Completing the information gathering and research stage – gather as much relevant equality-related information, data or research as possible in relation to the policy or proposal, including any engagement or consultation with those affected;

2.2 Analyse the evidence – make and assessment of the impact or effect on different equality groups;

2.3 – Developing an action plan – set out the action you will take to improve the positive impact and / or the mitigation action needed to eliminate or reduce any adverse impact that you have identified;

2.4 Director approval and sign off of the equality analysis – include the findings from the EA in your report or add as an appendix including the action plan;

2.5 Monitor and review – monitor the delivery of the action plan and ensure that changes arising from the assessment are implemented.

The Proposal

Assessor Name:	Marie Gallagher	Contact Details:	<i>Click or tap here to enter text.</i>
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1. What is the Proposal

The Section 278¹ works around the new development at 40 Leadenhall Street are being undertaken by M&G Real Estate and are due to be completed in Autumn 2023. Section 278 allows developers to enter into a legal agreement with the Highway Authority to make permanent changes or improvements to a public highway as part of a planning approval. 40 Leadenhall, which will provide 820,000 sq. ft of business space, will generate a significant number additional commuter trips to the area. The Site will also house a gym, retail space, restaurants, library, and auditorium, attracting recreational users, residents, and tourists.

The proposed works currently consist of:

Leadenhall Street:

- Footway widening and resurfacing on Leadenhall Street between 50 Leadenhall Street and Billiter Street
- Tree planting on Leadenhall Street between 50 Leadenhall Street and Billiter Street
- Carriageway resurfacing on Leadenhall Street (extent to be agreed)

Billiter Street:

- Renewed eastern footways along length of Billiter Street
- Public realm improvements, including additional benches, trees and short stay cycle parking, at the southern end of Billiter Street
- Bollards to be installed at the Billiter Street junction with Fenchurch Street
- Raised entry treatment at the Billiter Street junction with Leadenhall Street
- Carriageway resurfacing on Billiter Street (extent to be agreed)

Fenchurch Street:

- Renewed footways along Fenchurch Street between Billiter Street and Fenchurch Buildings
- Tree planting on northern footway of Fenchurch Street between Billiter Street and Fenchurch Buildings

Fenchurch Buildings:

- New carriageway in granite setts

¹ [Highways Act 1980 \(legislation.gov.uk\)](https://www.legislation.gov.uk)

- Raised entry treatment at the junction with Fenchurch Street
- Flush carriageway and footway at the northern end of Fenchurch Buildings

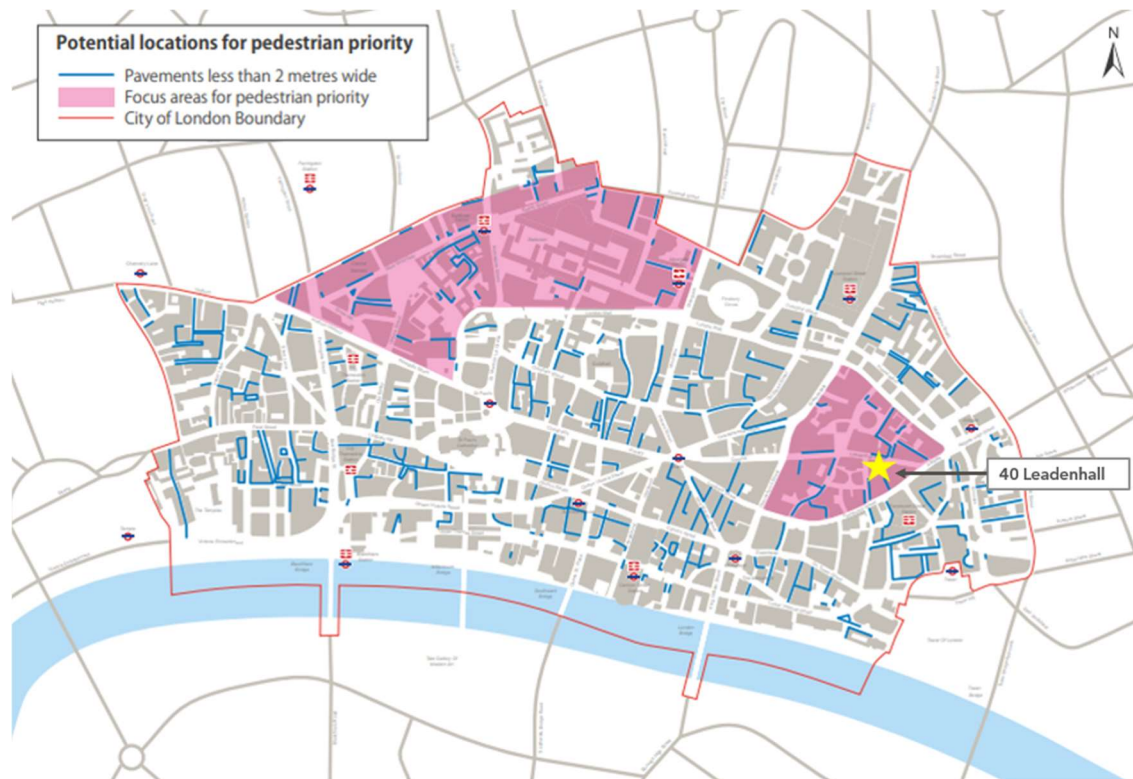
These measures are shown on the '01 - 100-16800456-GA 40 LEADENHALL GENERAL ARRANGEMENT DRAFT'.

Although small in scale, these works align with the City of London's Transport Strategy (2019)² to introduce pedestrian priority streets.

Figure 1 illustrates that 40 Leadenhall is located within one of the two focus areas for pedestrian priority in the City of London and Billiter Street has been identified as having existing footways less than two metres wide.

The proposed works also align with Proposal 5 of the City's Transport Strategy², which states that new developments should contribute to improving the experience of walking and spending time on the City's streets.

Figure 1: City of London's Potential Locations for Pedestrian Priority (Transport Strategy, 2019)



² [City of London Transport Strategy](#)

2. What are the recommendations? (responses in red by DL, 12th December 2022)

Given that the proposals are at the preliminary design stage (See General Arrangement drawing for more details), it is highly recommended that the following are considered to mitigate any negative impact on protected characteristic groups when developing the detailed design:

- **Tactile Paving:** New tactile paving is proposed at the eastern side of the Billiter Street junction with Leadenhall Road, however the General Arrangement drawing does not detail any proposals for new tactile paving on the western side. In line with Department for Transport's (DfT) Inclusive Mobility Guide 2021 guidance³, it is recommended that tactile paving is in place to aid visually impaired people. **Accepted. Design has been updated to incorporate this.**
- **Level Access:** In line with DfT's Inclusive Mobility Guide 2021³, it is recommended that level access is provided at the proposed raised junctions (Billiter Street/Leadenhall Street and Fenchurch Buildings/Fenchurch Street) to enable easy access for elderly people, those with limited mobility and those using mobility aids and pushchairs. **Design already includes level access/ raised entry treatments at these two locations.**
- **Footway Widths:** Given the scale of the development, it is advised that the renewed footways are the appropriate width to accommodate the subsequent increase in trip generation and footfall. This will prevent vulnerable road users, which includes people with disabilities, as well as elderly people and young people, from having to cross the road unnecessarily and/or utilise the carriageway, improving road safety for users. It is recommended that the footway widths are designed in conjunction with TfL's Pedestrian Comfort Guidance Technical guide (See Appendix B⁴). The same approach is also recommended at the corner of Fenchurch Buildings where it meets the betting shop and wine bar to ensure appropriate widths relative to footfall. **The Developer's PCLs work has been reviewed and was found to still be relevant. Two issues were identified in Billiter Street which the proposals will rectify. Its impossible to improve the issue identified at Fenchurch Buildings due to existing building lines.**
- **Bollards:** With regards to the bollards located at the Billiter Street/Fenchurch Street junction, it is presumed these are included to act as a Vehicle Security Barrier (VSB). If so, these should be placed at a maximum of 1.2 metres apart to enable passage of wheelchair and mobility scooter users, many of whom are more likely to be elderly whilst providing adequate protection for pedestrians. This recommendation also aligns with DfT guidance³. **This is already standard practice in the City.**
- **Cycle Parking:** It is recommended that the proposals to install short stay cycle parking on Billet Street consider providing stands that can accommodate cargo bikes, tandems, tricycles and side-by-side cycles, to encourage users of all abilities to visit the site by bike³. Adequate lighting should also be provided to improve security (see lighting below for more details). **Street lighting is not within the scope of this project although the City's M&E team will be notified of this point and it will be reviewed in accordance with the City Lighting Strategy. As the proposed cycle parking is in a part of the design which is still to be confirmed due to the unknown viability of the proposed trees there, the point is noted and will be considered once the outcome of trial holes and survey work for the proposed trees is known.**

³ [Inclusive Mobility. A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/94422/inclusive-mobility-a-guide-to-best-practice-on-access-to-pedestrian-and-transport-infrastructure.pdf)

⁴ [Pedestrian Comfort Guidance for London \(tfl.gov.uk\)](https://www.tfl.gov.uk/corporate/publications-and-reports/pedestrian-comfort-guidance-for-london)

- Seating: It is recommended that the location of the proposed seating on Billet Street is carefully positioned to avoid obstructing any key routes which may be used by wheelchair and pushchair users and should also be picked out in contrasting colours to help those with visual impairments³. **Noted. As per the cycle parking response, this part of the design is yet to be confirmed but ensuring there is adequate space for all users where possible is a BAU activity for the City's projects.**
- Dropped Kerbs: It is recommended that the dropped kerb located near the Billiter Street junction with Fenchurch Avenue (next to the proposed cycle parking) is relocated to ensure there is sufficient space for those with limited mobility and/or mobility aid and pushchair users to comfortably access the site. This could be resolved by relocating the bay or the cycle parking, however ease of accessing the entrances to 40 Leadenhall will need to be considered. **As before, this part of the design is yet to be confirmed. The project team will ensure all street furniture and the dropped kerb are positioned appropriately.**
- Trees: It is recommended that the location and arrangement of the proposed trees are developed in consultation with landscape architects and the designs align with existing guiding principles. This will help to prevent street clutter, ensure visibility, and avoid impeding informal crossing points⁵. Consideration should also be given to the tree species, selecting those with minimal leaf shedding to avoid a slippery footway. Street maintenance could also be procured to carry out appropriate clearing during the Autumn. **The current proposals only identify potential planting locations because of recent ground penetrating radar surveys. Their actual suitability is to be considered once their viability for planting is confirmed via trial hole and more-detailed surveys. The City's City Gardens team have been consulted and will continue to be involved in the project as it progresses.**
- Lighting: The General Arrangement drawing does not specify the location for lighting however it is recommended that both the pedestrianised section of Billiter Street and the Fenchurch Buildings are lit appropriately to prevent any anti-social behaviour, improve user safety for groups vulnerable to crime and further aid visually impaired members of the public. It is recommended that streetlights and signs should be mounted on walls or buildings whenever possible; if not, then placing them at the back of the footway as near the property line as possible is acceptable. In this position, the maximum distance from the property line to the outer edge of the pole should be 275mm. If they are placed on the road-side of the footway, they should be at least 450mm away from the edge of the carriageway³. **Street lighting is not within the scope of this project although the City's M&E team will be notified of this point and it will be reviewed in accordance with the City Lighting Strategy.**
- Maintenance of Setts: The setts proposed along the Fenchurch Buildings carriageway will need to be regularly maintained. This is because uneven and/or gaps between setts, can cause issues for some users, including those who are vision impaired, wheelchair users, and those using crutches and sticks³. This is particularly important given that Fenchurch Buildings will be used by large vehicles, including HGV's, which are more likely to cause damage to the carriageway. **The cost of the project, chargeable to private developer at 40 Leadenhall Street, includes an inflated commuted maintenance sum to deal with this issue.**
- Construction: A Construction Environmental Management Plan (CEMP) or Construction Logistics Plan (CLP) should be implemented to minimise construction impacts. It should include measures such as suitable diversion routes with appropriate signage for any required footway closures, noise and pollution mitigation, and an appropriate CLP to avoid sensitive receptors such as schools. Continued liaison with stakeholders, including emergency services, should also be

⁵ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1072722/Essex_Manual_for_Streets_Redacted.pdf

undertaken to inform them of the diversion routes. Places of worship located near to the site should be included in the stakeholder list and be informed of any out of hours works, allowing consideration of service times and religious holidays during the construction phase. On completion of the works, the develop could also offer a guide to familiarise the changes to those who are visually impaired. **Noted, these points are BAU processes at the City.**

- Road Safety Audit: A Stage 3 Road Safety Audit should also be completed on completion of the works to ensure that the improvements are accessible i.e., ensuring sufficient dropped kerbs and flush surfaces. **Noted. A Stage1/2 audit has been carried out and its findings fully considered prior to construction commencing.**

3. Who is affected by the Proposal? *Identify the main groups most likely to be directly or indirectly affected by the recommendations.*

The proposed scheme is located in the City of London, within the Aldgate ward. The City of London is a key commercial district, hosting the primary business district for the capital. The area around the proposed scheme also comprises of retail space, most notably Leadenhall Market, as well as restaurants, cafes, and bars. 40 Leadenhall is located within a short distance of Fenchurch Street station (two-minute walk) and is also accessible by Aldgate, Bank, Monument and Tower Hill stations.

Given the proposed works are located within a key commercial district and the area boasts a high Public Transport Accessibility Level (PTAL) rating of 6b⁶, those that are likely to be affected by the proposals are pedestrians, cyclists, and other non-motorised users. These users are more likely to be of the working population commuting to their places of work. The City of London estimates approximately 513,000 daily commuters⁷ and this specific development, which will provide 820,000 sq. ft of business space, will generate a significant number additional commuter trips to the area. Further to this, 40 Leadenhall Street will also house a gym, retail space, restaurants, library, and auditorium, attracting recreational users, residents, and tourists, all of whom will be affected by the proposed scheme. It is also important to note that although the population of the City of London is comparatively small compared to other London boroughs, residents living in the borough have the highest overall active, efficient, and sustainable mode share (93%)⁸, suggesting that residents are also likely to benefit from the improvements.

Although a predominantly business district, several other trip generators are located within close proximity of 40 Leadenhall, which will attract users to the area who may also be affected by the proposed works and construction. These include places of worship, schools, and health facilities which have been detailed in the full assessment below. The site is easily accessible by sustainable modes therefore users are most likely to travel to these trip generators on foot, by bike or public transport.

⁶ <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcat/webcat?Input=40%20Leadenhall%20Street%2C%20London%2C%20UK&locationId=ChIjufCZG00DdkgR1yfnHzemqU0&scenario=Base%20Year&type=Ptal>

⁷ <https://www.cityoflondon.gov.uk/about-us/about-the-city-of-london-corporation/our-role-in-london#:~:text=In%20just%201.12%20square%20miles,commuters%20and%2010m%20annual%20visitors>

⁸ <https://content.tfl.gov.uk/travel-in-london-report-13.pdf>

Fenchurch Street station offers step free access from the main Fenchurch Street entrance / exit, and both Bank and Tower Hill stations offer partial step-free access. Monument and Aldgate do not provide step free access. The area is also served by bus routes which run on both Leadenhall Street and Fenchurch Street. There is a westbound bus stop (Stop T) located on Fenchurch Street, 30 metres east of the junction with Billiter Street. There are also two bus stops located on Leadenhall Street including a westbound bus stop (Stop W), located 80 metres east of the junction with Billiter Street, and an eastbound bus stop (Stop X), located 110 metres eastbound of Billiter Street. Both are served by routes 25, N25 and N550. Due to the accessibility of the site by public transport, wheelchair users and those using pushchairs are also likely to visit the area and could therefore be affected by the proposed works and construction.

It is assumed that although construction will take place within the existing hoarding boundaries, some protected characteristic groups, particularly disabled and elderly/younger groups, may be adversely impacted if the appropriate pedestrian diversions, noise and pollution mitigation, and CLPs are not in place. Further to this, although the resurfacing of Leadenhall Street and Billiter Street will require a short term/temporary closure, with one-way working and temporary traffic lights, it is not considered that this will lead to access issues for those with protected characteristics. This is because Leadenhall Road and Billiter Street will still be open and vehicle access, including buses, will be maintained throughout construction. A full assessment of the potential impacts on each of the protected characteristic groups with regards to construction is provided below.

Age

Check this box if NOT applicable

Age - Additional Equalities Data (Service Level or Corporate) *Include data analysis of the impact of the proposals*

The Office for National Statistics (ONS) Mid-2020⁹ population estimates for the City of London states a total population of 10,938 for the borough. The age breakdowns for the City of London and London are detailed in Table 1 below:

Table 1: Age Breakdown for City of London and London (Source: ONS Census Data 2020)

Age	City of London %	Greater London %
Under 5 years	4.3%	6.6%
5 to 15 years	11%	14%
16 to 24 years	13%	10.3%
25 to 64 years	55.8%	56.9%
65 years and over	15.8%	12.2%
Total	100%	100%

⁹ <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesscotlandandnorthernireland>

This figures above illustrate that the City of London has slightly fewer people under the age of 15 (15.3%) compared to Greater London (20.6%). Conversely, the City of London has a slightly higher percentage of people aged 16 to 24 years and 65 years and over, when compared to Greater London. The percentage of people aged 25 to 64 years is similar between the City of London and Greater London region.

It should be noted however that this data is not considered representative of the majority of the people likely to be affected by the proposed scheme given the large percentage of commuters regularly travelling to the area, and more specifically the development, rather than residents.

Table 2: Workforce Age Structure, City of London and Greater London 2011 (Source: City of London Workforce CENSUS 2011- Analysis by Age and Occupation)

Age Band	City of London		Greater London	
	Actual	%	Actual	%
16 - 19	2,521	1%	81,959	2%
20 - 24	26,806	8%	387,569	9%
25 - 29	67,481	19%	685,431	15%
30 - 34	70,450	20%	697,643	16%
35 - 39	56,574	16%	591,814	13%
40 - 44	45,902	13%	548,352	12%
45 - 49	35,964	10%	507,549	11%
50 - 54	24,541	7%	405,451	9%
55 - 59	14,941	4%	295,937	7%
60 - 64	8,293	2%	196,176	4%
65 - 69	2,370	1%	73,115	2%
70 - 74	863	0%	29,485	1%
Total	356,706	100%	4,500,481	100

Table 2 shows the age breakdown of the workforce of the City of London compared to Greater London. The figures show that the ages of 25-34 contribute a substantial proportion of the workforce at 39%. The same age range for Greater London comprises 31% of the workforce. This shows that the City of London has a greater proportion of young professionals compared to Greater London. Similarly, the 35-49 age group comprises 39% of the workforce in the City of London, compared to 36% of the Greater London workforce. The percentage of the workforce in the City of London aged 50 years and above (14%) is lower than the percentage for Greater London (23%), showing that the City of London has a smaller proportion of older professionals.

Sensitive receptors

With regards to sensitive receptors relevant to age, there are some schools and colleges located within 500 metres of the proposed works where higher proportions of children and young people are likely to be concentrated. These include:

- Shillington College of Graphic Design – 100 metres north of the proposed scheme
- The Aldgate School – 170 metres east of the proposed scheme
- David Game College – 250 metres southeast of the proposed scheme

There are no nurseries within 500 metres of the proposed works.

What is the proposal's impact on the equalities aim? *Look for direct impact but also evidence of disproportionate impact i.e., where a decision affects a protected group more than the general population, including indirect impact*

The proposed footway and public realm improvements surrounding the development are likely to positively benefit people of all ages, including elderly and younger people.

Research by TfL has found that walking is the most frequently used mode of transport by older Londoners aged 65 and over¹⁰, with 87% walking at least once a week. Looking at the census data above, a large proportion of the City of London's population (15.8%) would therefore benefit from the proposals to improve the pedestrian environment outside 40 Leadenhall.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

Given that the proposals are at the preliminary design stage (See General Arrangement drawing for more details), it is highly recommended that the following is considered to mitigate any negative impact on elderly and younger people when developing the detailed design:

- Level Access: In line with the DfT's Inclusive Mobility Guide 2021³, it is recommended that level access is provided at the proposed raised junctions (Billiter Street/Leadenhall Street and Fenchurch Buildings/Fenchurch Street) to enable easy access for elderly people, particularly those using mobility aids, as well as those travelling with young children in pushchairs.

¹⁰ [Travel in London: Understanding our diverse communities 2019 \(tfl.gov.uk\)](https://tfl.gov.uk/roadworks/understanding-our-diverse-communities-2019)

Building on this, the DfT underlines the need to provide plenty of appropriately placed and designed seating in locations where people may have to wait and along pedestrian routes³. The proposals to provide seating as part of the public realm improvements on Billiter Street will help to achieve this, providing a place to rest adjacent to but not obstructing, the pedestrian route along Fenchurch Street.

Seating provision and clear, high-quality footways are particularly important for elderly people, who are more likely to be living with a long-term health condition and may have more limited mobility and stamina. Research undertaken by Age UK underlines this intersectionality between age and disability further, with figures showing that 52% of those aged 65 and over are disabled compared with only 9% under 64¹¹.

Street trees can also play a key role in helping to remove harmful PM10 particulates and NO2 roadside emissions¹² and mitigating against climate change impacts such as heating of streets (and provision of shaded areas), both of which young people and elderly people are disproportionately affected by^{13,14}.

With this in mind, the proposals to renew the footways, increase footway widths and enhance the public realm, would benefit both elderly and younger users and help to address some of the key barriers to active travel for the elderly population. Although the City of London has a smaller population under the age of 15 compared to London as a whole, 15.3% compared to 20.6% respectively, children and young people attending the educational establishments located within 500 metres of the proposed works, are likely to benefit from the improved pedestrian environment on their journeys to school / college. This could deliver a particular benefit to pupils attending The Aldgate School, as primary school aged pupils are more likely to travel to school by active modes¹⁵, are more at risk of road danger¹⁰ and their parents are more likely to be travelling with young children in pushchairs.

- **Footway Widths:** Given the scale of the development, it is advised that the renewed footways are the appropriate width to accommodate the subsequent increase in trip generation and footfall. This will prevent vulnerable road users, particularly elderly and younger people¹⁰, as well as those using mobility aids, from having to cross the road to avoid congestion and/or step in the carriageway to pass other pedestrians. It is recommended that the footway widths are designed in conjunction with TfL's Pedestrian Comfort Guidance Technical guide (See Appendix B⁴). The same approach is recommended at the corner of Fenchurch Buildings where it meets the betting shop and wine bar to ensure appropriate widths relative to footfall.
- **Bollards:** With regards to the bollards located at the Billiter Street/Fenchurch Street junction, it is presumed these are included to act as a Vehicle Security Barrier (VSB). If so, these should be placed at a maximum of 1.2 metres apart to enable passage of wheelchair and mobility scooter users, many of whom are more likely to be elderly whilst providing adequate protection for pedestrians. This recommendation also aligns with DfT guidance³.
- **Cycle Parking:** It is recommended that the short stay cycle parking on Billet Street considers providing stands that can accommodate cargo bikes, tandems, tricycles and side-by-side cycles, to encourage users of all abilities to visit the site by bike³.
- **Construction:** A CEMP or CLP should be implemented to minimise construction impacts¹⁷. It should include measures such as suitable diversion routes with appropriate signage for any required footway closures as well as noise mitigation. The CLP should consider any educational establishment located near the site, ensuring the construction routes avoid key routes to and from nearby schools and access / deliveries

¹¹ <https://www.ageuk.org.uk/london/about-us/media-centre/facts-and-figures/>

¹² https://www.london.gov.uk/sites/default/files/valuing_londons_urban_forest_i-tree_report_final.pdf

¹³ <https://www.unep.org/news-and-stories/blogpost/young-and-old-air-pollution-affects-most-vulnerable>

¹⁴ <https://www.gov.uk/government/publications/health-matters-air-pollution/health-matters-air-pollution>

¹⁵ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/476635/travel-to-school.pdf

It should be acknowledged however that the majority of users are likely to be those commuting to or visiting the area. As illustrated in Table 2, those commuting to the City of London are most likely to be between the ages of 25-49 (78% of the workforce) and are therefore not considered vulnerable to the factors listed above due to their age.

Construction:

The proposed works will be undertaken within the existing hoarding boundaries and there are existing pedestrian diversions in place on both Fenchurch Street and Leadenhall Street to divert users away from the closed footways.

These include a signalised pedestrian crossing with dropped kerb and tactile paving on the northern side of Fenchurch Street providing a connection to the southern footway on Fenchurch Street, and temporary ramps on Leadenhall Street at the junction with Creechurch Lane and the junction with Billiter Street. Although existing diversion routes are in place, the quality of the ramps on Leadenhall Street are substandard, which may already pose an accessibility issue for some users and are also likely to affect elderly people during the construction phase.

Building on this, several potential negative impacts on elderly and younger people have been identified if the appropriate measures are not in place during the construction phase¹⁶. These include:

- Wheelchair and mobility aid users may find it difficult to utilise the temporary ramps
- Construction noise can negatively affect elderly and young people
- Construction can also generate additional dust and pollutants which negatively impact people with respiratory or long-term illnesses

Young people travelling to schools in the area may also be affected on their journeys if the appropriate footway diversions are not in place during construction¹⁷. Further to this, construction traffic to the site may increase traffic risk to vulnerable road users, which includes both elderly and young people.

are arranged outside of school operating times. Continued liaison with stakeholders should also be undertaken to inform the plans.

- Road Safety Audit: A Stage 3 Road Safety Audit should also be completed on completion of the works to ensure that the improvements are accessible i.e., ensuring sufficient dropped kerbs and flush surfaces.

¹⁶ [Transport, health and wellbeing \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

¹⁷ [Code of Practice for Deconstruction and Construction Sites \(cityoflondon.gov.uk\)](https://cityoflondon.gov.uk)

<p>Further to this, although the resurfacing of Leadenhall Street and Billiter Street will require a short term/temporary closure, with one-way working and temporary traffic lights, it is not considered that this will lead to access issues or longer journey times for the elderly and those with limited mobility. This is because the works will not require road or bus stop closures therefore, access to the site and surrounding area via public transport or car will still be possible.</p> <p>Summary: In summary, the positive impacts associated with the improved pedestrian environment and public realm, are likely to be felt by all users, including residents, visitors, and commuters to the area, regardless of age.</p> <p>With regards to construction, the existing pedestrian diversions are deemed insufficient, therefore it is recommended that any negative impact on access for elderly and younger people is offset by ensuring that suitable, clear diversions with ramps and appropriate signage are provided. See adjacent section for further details.</p>	
<p>Key borough statistics:</p> <ul style="list-style-type: none"> • The City of London is dominated by businesses and the residential population is significantly lower compared to other London boroughs. • The City has proportionately more people aged between 25 and 69 living in the Square Mile than in Greater London. Conversely, there are fewer younger people. Approximately 955 children and young people under the age of 18 years live in the City. This is 11.8% of the total population in the area. 	<ul style="list-style-type: none"> • There is a smaller percentage of younger people (under 25) working in the City of London in comparison to Greater London, as well as a smaller percentage of over 45s. There is a larger percentage working in the City in the 25-44 age bands in comparison to Greater London. • Summaries of the City of London age profiles from the 2011 Census can be found on our website

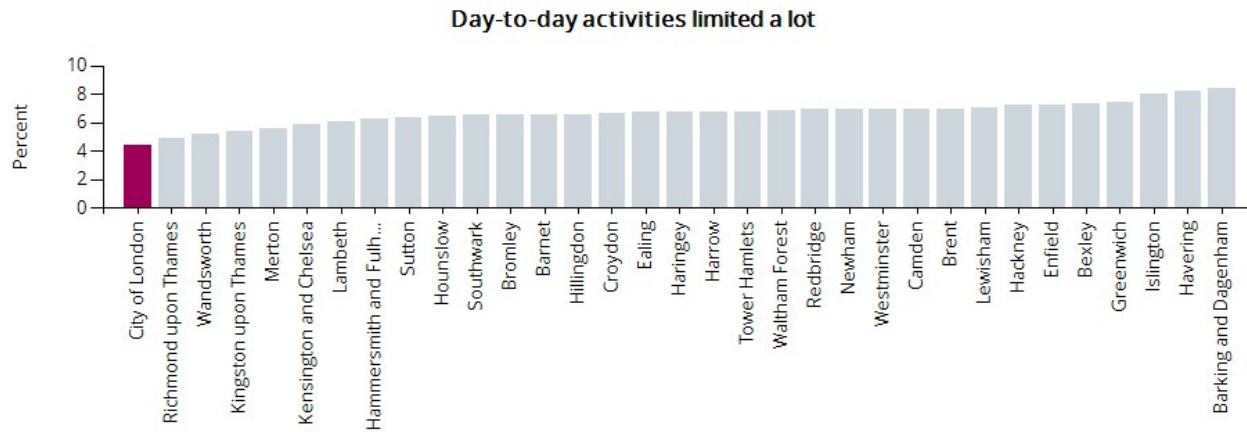
Disability

Check this box if NOT applicable

Disability - Additional Equalities Data (Service Level or Corporate) *Include data analysis of the impact of the proposals*

ONS disability and well-being 2020 analysis shows that disability can negatively affect wellbeing. For example, the average well-being ratings for people aged 16 to 64 with a self-reported long-standing illness, condition or impairment which causes difficulty with day-day activities between July 2013 to June 2020 showed lower scores for life satisfaction each year¹⁸.

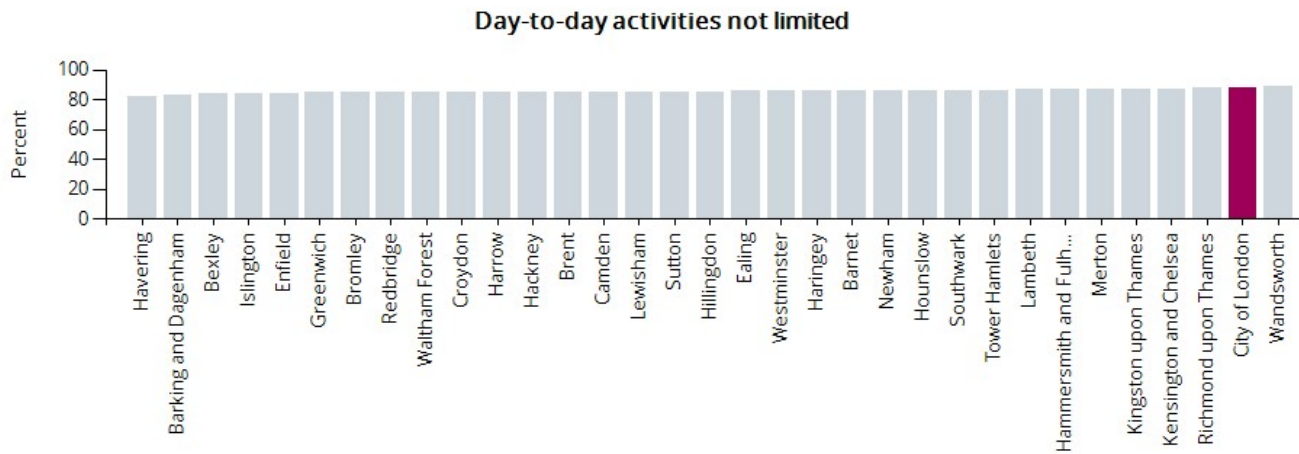
As per the Census 2011, the below graph shows the percentage of the City of London residents who considered their day-to-day activities limited a lot due to disability or long-term illness compared with other London boroughs. The City of London compares favourably as it has the lowest percentage at 4.4%.



Source: ONS Census 2011

The below graph shows the percentage of the City of London residents who considered their day-to-day activities not to be limited by disability or long-term illness compared to other London boroughs. The City of London again compares favourably, as it had the second highest percentage at 88.5%.

¹⁸ <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/disability/datasets/disabilityandwellbeing>



Source: ONS Census 2011

Public Health England statistics support the above trend, as they report the percentage of people with a limiting long-term illness or disability in the City of London is 11.5% compared to 17.6% for England. This is considered significantly better than the national average¹⁹.

As mentioned above, it should be noted that this data is not considered representative of the majority of the people likely to be affected by the proposed scheme given the large percentage of commuters regularly travelling to the area, and more specifically the development, rather than residents. Given that the area is likely to be visited by individuals living outside of the City, it is important to note that approximately one in ten individuals are estimated to be neurodivergent in Greater London (equating to approximately 900,000), and one-tenth of those are possibly autistic²⁰. Further to this, there are over 2 million people in the UK living with sight loss²¹. With these statistics in mind, it is therefore paramount that the construction of and design of the proposed works considers all users.

Sensitive receptors

There are several medical facilities in proximity to the proposed scheme which offer services more likely to be used by members of this protected characteristic group. These include:

¹⁹ https://www.localhealth.org.uk/#c=report&chapter=c05&report=r01&selgeo1=lalt_2021.E09000001&selgeo2=eng.E92000001

²⁰ <https://www.london.gov.uk/questions/2022/1716#:~:text=Andrew%20Boff%20AM%3A%20With%20approximately,900%2C000%20Londoners%20with%20neurodivergent%20conditions>

²¹ <https://www.rnib.org.uk/professionals/health-social-care-education-professionals/knowledge-and-research-hub/key-information-and-statistics-on-sight-loss-in-the-uk/> (data is not available at a local scale)

- Roodland Medical (Tower Hill Clinic) – 250 metres southeast of the proposed scheme
- Portsoken Health Centre – 400 metres east of the proposed scheme
- City Walk-In-Clinic- 425 metres southwest of the proposed scheme
- Same Day Doctor – 440 metres south of the proposed scheme

There are also Boots stores in close proximity to the proposed scheme which provide pharmacy facilities.

What is the proposal’s impact on the equalities aim? *Look for direct impact but also evidence of disproportionate impact i.e. where a decision affects a protected group more than the general population, including indirect impact*

The proposed footway and public realm improvements surrounding the development are likely to positively benefit all users, including those with disabilities.

The baseline data shows that there is a low comparative percentage of people with disabilities in the City of London. As illustrated in the section above however, the majority of people likely to be affected by the proposed works are less likely to be residents, therefore it is acknowledged that there may be a larger number of disabled people accessing 40 Leadenhall and the surrounding area than the data suggests. This is likely to be facilitated by the accessibility of the area by public transport, enabling those with limited mobility to access the site and surrounding area given bus and step-free tube/train station provision.

Statistics show that 14% of Londoners currently consider themselves to have a disability that impacts their day-to-day activities ‘a little’ or ‘a lot’, and this is expected to rise to 17% by 2030²². Further to this, walking is the main mode of travel for disabled Londoners, with 78% reporting they walk at least once a week. However, 65% of disabled Londoners consider the condition of the pavements to be a barrier to walking more frequently²³.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

Given that the proposals are at the preliminary design stage (See General Arrangement drawing for more details), it is highly recommended that the following is considered to mitigate any negative impact on people with disabilities, when developing the detailed design:

- Tactile paving: New tactile paving is proposed at the eastern side of the Billiter Street junction with Leadenhall Road, however the General Arrangement drawing does not detail any proposals for new tactile paving on the western side. In line with Department for Transport’s Inclusive Mobility Guide 2021 guidance³, it is recommended that tactile paving is in place to aid visually impaired people. This is particularly important to consider given that the Royal National Institute of Blind People (RNIB) report that walking is the main mode of travel for blind and partially sighted people, many of whom will have fewer transport options available to them than others²⁵.
- Level Access: In line with the DfT’s Inclusive Mobility Guide 2021³, it is recommended that level access is provided at the proposed raised junctions (Billiter Street/Leadenhall Street and Fenchurch Buildings/Fenchurch Street) to enable easy access for those with limited mobility and mobility aids.

²² <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/disability/articles/outcomesfordisabledpeopleintheuk/2021>

²³ <https://www.cityoflondon.gov.uk/assets/Services-Environment/city-of-london-transport-strategy.pdf>

²⁵ [Travel, transport and mobility | RNIB](#)

With this in mind, it is therefore important that the design considers these requirements, which aligns with the City of London's Transport Strategy proposal to develop and apply the City of London Street Accessibility Standard (see page 52 of the strategy for more information²).

Research by Transport for All²⁴ has identified some of the key barriers to active travel for those with disabilities, including:

- Pavements cluttered by obstacles are difficult for those with mobility impairments to navigate and can pose a hazard to those with visual impairments. They are also confusing and overwhelming for those who are neurodivergent.
- Pavements that are steep, uneven, or bumpy are difficult to traverse in a wheelchair and can be trip-hazards. Tree roots, cobblestones, and poorly laid paving stones all contribute to this.

Similarly, these findings are echoed by DfT's Inclusive Mobility³ guide, whereby a number of barriers to navigating the pedestrian environment were identified, including obstacles, uneven surfaces, crossing the road, navigating slopes and ramps, and lack of confidence to travel. The guidance also underlines that good, inclusive design benefits all users, including those who have non-visible disabilities.

The proposed footway and public realm improvements associated with the development should help to tackle some of these key barriers, however the General Arrangement drawing does not provide enough detail on the following elements of the works to ensure accessibility for all users:

- Footway widths on Billiter Street, Fenchurch Street and Leadenhall Street
- Details regarding the distance between cycle parking stands and bollards within the pedestrianised space on Billet Street
- Details regarding type of cycle parking stands
- Tree planting and covers on Leadenhall Street, Fenchurch Street, and Billet Street
- Maintenance of setts on Fenchurch Buildings

- **Footway Widths:** Given the scale of the development, it is advised that the renewed footways are the appropriate width to accommodate the subsequent increase in trip generation and footfall. This will prevent vulnerable road users, which includes people with disabilities¹⁰, from having to cross the road unnecessarily and/or utilise the carriageway, improving road safety for the users. Appropriate widths will improve the overall user experience and help to support independent travel. It is recommended that the footway widths are designed in conjunction with TfL's Pedestrian Comfort Guidance Technical guide (See Appendix B⁴). The same approach is also recommended at the corner of Fenchurch Buildings where it meets the betting shop and wine bar to ensure appropriate widths relative to footfall.
- **Bollards:** With regards to the bollards located at the Billiter Street/Fenchurch Street junction, it is presumed these are included to act as a Vehicle Security Barrier (VSB). If so, these should be placed at a maximum of 1.2 metres apart to enable passage of wheelchair and mobility scooter users, many of whom are more likely to be elderly whilst providing adequate protection for pedestrians. This recommendation also aligns with DfT guidance³.
- **Cycle Parking:** It is recommended that the proposals to install short stay cycle parking on Billet Street considers providing stands that can accommodate cargo bikes, tandems, tricycles and side-by-side cycles, to encourage users of all abilities to visit the site by bike³. Adequate lighting should be provided also to improve security (see below for more details).
- **Seating:** It is recommended that the location of the proposed seating on Billet Street is carefully positioned to avoid obstructing any key routes which may be used by wheelchair users and should also be picked out in contrasting colours to help those with visual impairments³.
- **Dropped Kerbs:** It is recommended that the dropped kerb located near the Billiter Street junction with Fenchurch Avenue (next to the proposed cycle parking) is relocated to ensure there is sufficient space for those with

²⁴ <https://www.transportforall.org.uk/campaigns-and-research/pave-the-way/>

(Recommendations have been provided to address each of these elements in the adjacent section).

In terms of sensitive receptors, there are medical facilities within 500 metres of the proposed works which may be used by disabled people. Following construction, users of the local medical centres are likely to benefit from the improved pedestrian environment on their journey's to and from these facilities.

Construction:

The proposed works will be undertaken within the existing hoarding boundaries and there are existing pedestrian diversions in place on both Fenchurch Street and Leadenhall Street to divert users away from the closed footways (see above for full details of existing diversions).

Although existing diversion routes are in place, the quality of the ramps on Leadenhall Street are substandard, which may already pose an accessibility issue for some users and are also likely to affect disabled people during the construction phase. People with disabilities travelling to health centres or pharmacies in the area may also be affected on their journeys if the appropriate footway diversions are not in place during construction.

Building on this, several potential negative impacts on people with disabilities have been identified if the appropriate measures are not in place during the construction phase¹⁶. These include:

- Wheelchair and mobility aid users may find it difficult to utilise the temporary ramps
- Those who are considered sensitive to changes in visual stimuli may find the diversions difficult to navigate
- Construction noise can negatively affect people with autism
- Altered public realm and closures can be confusing to those with visual impairments who are familiar with the area

limited mobility and/or mobility aid users to comfortably access the site. This could be resolved by relocating the bay or the cycle parking, however ease of accessing the entrances to 40 Leadenhall will need to be considered.

- **Trees:** It is recommended that the location and arrangement of the proposed trees are developed in consultation with landscape architects and the designs align with existing guiding principles. This will help to prevent street clutter, ensure visibility, and avoid impeding informal crossing points²⁶. Consideration should also be given to the tree species, selecting those with minimal leaf shedding to avoid a slippery footway. Street maintenance could also be procured to carry out appropriate clearing during the Autumn.
- **Lighting:** The General Arrangement drawing does not specify locations for lighting however it is recommended that both the pedestrianised section of Billiter Street and the Fenchurch Buildings are lit appropriately to prevent any anti-social behaviour, improve user safety and further aid visually impaired members of the public. It is recommended that streetlights and signs should be mounted on walls or buildings whenever possible; if not, then placing them at the back of the footway as near the property line as possible is acceptable. In this position, the maximum distance from the property line to the outer edge of the pole should be 275mm. If they are placed on the road-side of the footway, they should be at least 450mm away from the edge of the carriageway³.
- **Maintenance of Setts:** The setts proposed along the Fenchurch Buildings carriageway will need to be regularly maintained. This is because uneven and/or gaps between setts, can cause issues for some users, including those who are vision impaired, wheelchair users, and those using crutches and sticks³. This is particularly important given that Fenchurch Buildings will be used by large vehicles, including HGV's, which are more likely to cause damage to the carriageway.

²⁶ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1072722/Essex_Manual_for_Streets_Redacted.pdf

- Construction can also generate additional dust and pollutants which negatively impact people with respiratory or long-term illnesses

Further to this, although the resurfacing of Leadenhall Street and Billiter Street will require a short term/temporary closure, with one-way working and temporary traffic lights, it is not considered that this will lead to access issues or longer journey times for those with disabilities. This is because the works will not require road or bus stop closures therefore, access to the site and surrounding area via public transport or car will still be possible.

Summary:

It is likely that disability would be the protected characteristic group most affected by the proposals. Once construction is complete, the improved pedestrian environment and public realm would provide substantial benefits to disabled people.

With regards to construction, the existing pedestrian diversions are deemed insufficient, therefore it is recommended that any negative impact on access for those with disabilities is offset by ensuring that suitable, clear diversions with ramps and appropriate signage are provided. See adjacent section for further details.

Key borough statistics:

Day-to-day activities can be limited by disability or long-term illness – In the City of London as a whole, 89% of the residents feel they have no limitations in their activities – this is higher than both in England and Wales (82%) and Greater London (86%). In the areas outside the main housing estates, around 95% of the residents responded that their activities were not limited. Additional information on Disability and Mobility data, London, can be found on the [London Datastore](#).

Measures on self-reported health were also collected during the 2011 census for the City of London borough. The responses were categorised into Very Bad, Bad, Fair, Good and Very Good health.

- 0.8% of the population of The City self-reported as having Very Bad health.
- 55.8% of the population self-reported as having Very Good health.

- Construction: A CEMP or CLP should be implemented to minimise construction impacts¹⁷. It should include measures such as suitable diversion routes with appropriate signage for any required footway closures, as well as noise mitigation. Continued liaison with stakeholders should also be undertaken to inform the plans. On completion of the works, the develop could also offer a guide to familiarise the changes to those who are visually impaired.

- Road Safety Audit: A Stage 3 Road Safety Audit should also be completed on completion of the works to ensure that the improvements are accessible i.e., ensuring sufficient dropped kerbs and flush surfaces.

The 2011 Census identified that for the City of London’s population:

- 4.4% (328) had a disability that limited their day-to-day activities a lot
- 7.1% (520) had a disability that limited their day-to-day activities a little

Source: 2011 Census: [Long-term health problem or disability, local authorities in England and Wales](#)

Pregnancy and Maternity

Check this box if NOT applicable

Pregnancy and Maternity – Additional Equalities Data (Service Level or Corporate) *Include data analysis of the impact of the proposals*

The ONS Conception Statistics, England and Wales, 2020 (Table 5) show the conception numbers for the City of London. Note these numbers have been combined with the Hackney borough to preserve confidentiality. There were 5,659 conceptions in Hackney and the City of London in 2020. This equates to a conception rate per 1,000 women aged 15 to 44 years of 74.6%. This is slightly higher than the average for Inner London (66.1%) and lower than the average for London as a whole (76.2%).²⁷

There were 60 live births in the City of London in 2021. The Total Fertility Rate (TFR) in the City was 1.74. This is the average number of live children that women in the group could bare if they experienced age specific fertility rate of the calendar year throughout their childbearing lifespan. This is higher than the average for Inner London (1.28) and also for London as a whole (1.52)²⁸.

As mentioned above, it should be noted that this data is not considered representative of the majority of the people likely to be affected by the proposed scheme given the large percentage of commuters regularly travelling to the area, and more specifically the development, rather than residents.

Sensitive receptors

Facilities providing services for sensitive receptors in proximity to the proposed scheme which are most relevant to pregnancy and maternity are the same as those for disability.

What is the proposal's impact on the equalities aim? *Look for direct impact but also evidence of disproportionate impact i.e. where a decision affects a protected group more than the general population, including indirect impact*

Pregnant women are known to have restricted mobility due to their pregnancy. The proposed works will provide safety and accessibility benefits to this group in a similar way to those mentioned for the above protected characteristics. Parents with younger children and push chairs could also benefit from the improvements to the public realm during maternity, as the proposed works would improve the overall pedestrian environment and accessibility.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

Given that the proposals are at the preliminary design stage (See General Arrangement drawing for more details), it is highly recommended that the following is considered to mitigate any negative impact on pregnant women and women with young children when developing the detailed design:

²⁷ <https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/conceptionandfertilityrates/datasets/conceptionstatisticsenglandandwalesreferencetables>.

²⁸ [Births in England and Wales: summary tables – Office for National Statistics \(ons.gov.uk\)](#)

In terms of sensitive receptors, there are medical facilities within 500 metres of the proposed works which may be used by pregnant women. Users of these facilities will benefit from the improved pedestrian environment on their journey's to and from these facilities.

Construction:

The proposed works will be undertaken within the existing hoarding boundaries and there are existing pedestrian diversions in place on both Fenchurch Street and Leadenhall Street to divert users away from the closed footways (see above for full details of existing diversions).

Although existing diversion routes are in place, the quality of the ramps on Leadenhall Street are substandard, which may already pose an accessibility issue for some users and are also likely to affect disabled people during the construction phase. Pregnant women travelling to health centres or pharmacies in the area may also be affected on their journeys if the appropriate footway diversions are not in place during construction.

Building on this, several potential negative impacts on pregnant women and those using pushchairs have been identified if the appropriate measures are not in place during the construction phase¹⁶. These include:

- Pushchair users may find it difficult to utilise the temporary ramps
- Construction can also generate additional dust and pollutants which negatively impact pregnant women

Further to this, although the resurfacing of Leadenhall Street and Billiter Street will require a short term/temporary closure, with one-way working and temporary traffic lights, it is not considered that this will lead to access issues or longer journey times for pregnant women and those travelling with young children. This is because the works will not require road or bus stop closures therefore, access to the site and surrounding area via public transport or car will still be possible.

- **Level Access:** In line with the DfT's Inclusive Mobility Guide 2021³, it is recommended that level access is provided at the proposed raised junctions (Billiter Street/Leadenhall Street and Fenchurch Buildings/Fenchurch Street) to enable easy access for those travelling with young children in pushchairs.
- **Footway Widths:** Given the scale of the development, it is advised that the renewed footways are the appropriate width to accommodate the subsequent increase in trip generation and footfall. This will prevent vulnerable road users as well as those using pushchairs, from having to step in the carriageway to pass other pedestrians. It is recommended that the footway widths are designed in conjunction with TfL's Pedestrian Comfort Guidance Technical guide (See Appendix B⁴). The same approach to ensure sufficient widths is recommended at the corner of Fenchurch Buildings where it meets the betting shop and wine bar.
- **Lighting:** Pregnant women and those with push chairs can feel especially vulnerable in places with limited surveillance and low lighting. It is therefore recommended that sufficient levels of lighting should be included in the design along Fenchurch Buildings and the pedestrianised section of Billiter Street to further improve safety of users and to account for any blind spots.
- **Construction:** A CEMP or CLP should be implemented to minimise construction impacts¹⁷. It should include measures such as suitable diversion routes with appropriate signage for any required footway closures. Continued liaison with stakeholders should also be undertaken to inform the plans.
- **Road Safety Audit:** A Stage 3 Road Safety Audit should also be completed on completion of the works to ensure that the improvements are accessible i.e., ensuring sufficient dropped kerbs and flush surfaces.

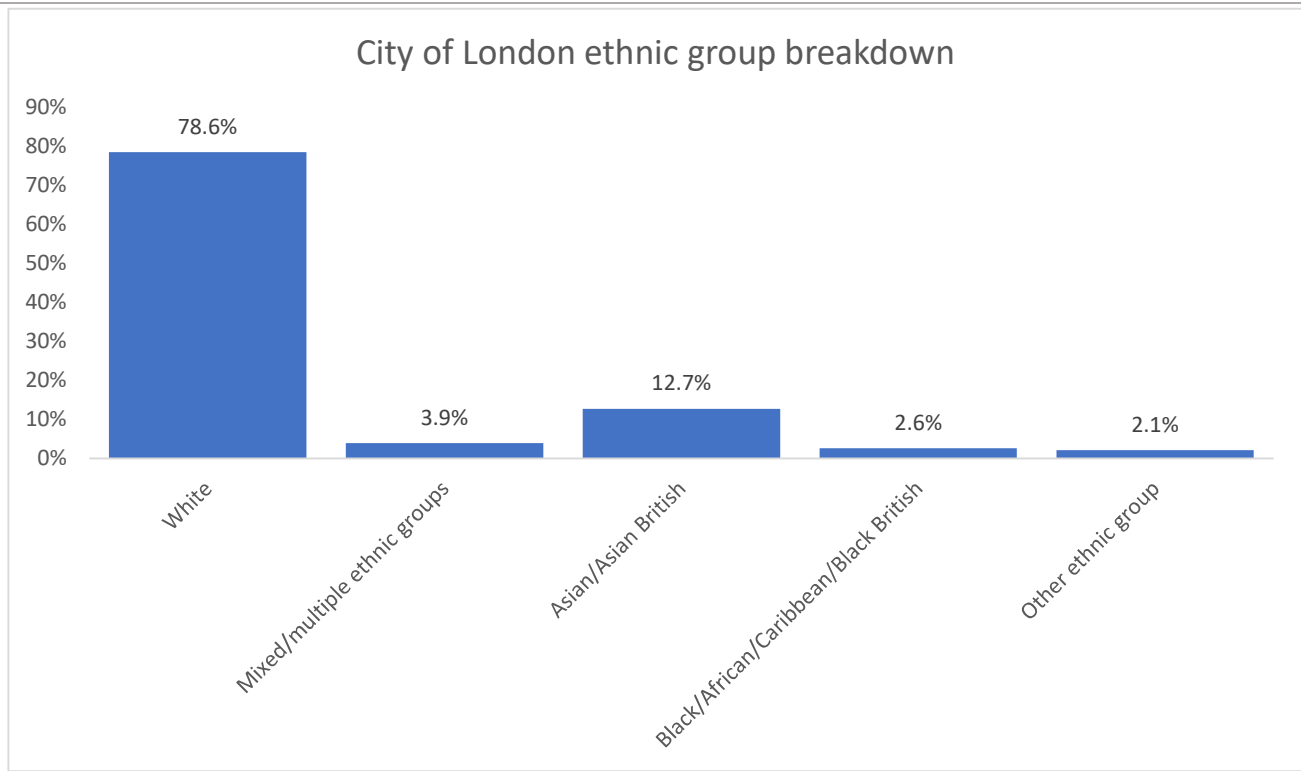
<p>Summary:</p> <p>Pregnant women may be negatively affected during the construction phase and without sufficient lighting incorporated into the design, however, the potential adverse impacts would be sufficiently managed through implementation of suitable design measures discussed in the adjacent actions section.</p>	
<p>Key borough statistics:</p> <ul style="list-style-type: none"> There were 5,659 conceptions in Hackney and The City in 2020. This equates to a conception rate per 1,000 women aged 15 to 44 years of 74.6%. This is slightly higher than the average for Inner London (66.1%) and lower than the average for London as a whole (76.2%)²⁷. 	<ul style="list-style-type: none"> There were 60 live births in The City of London in 2021. The Total Fertility Rate (TFR) in the City was 1.74. This is higher than the average for Inner London (1.28) and also for London as a whole (1.52)²⁸.

Race

Check this box if NOT applicable

Race - Additional Equalities Data (Service Level or Corporate) *Include data analysis of the impact of the proposals*

The below bar chart shows the ethnic group breakdown for the City of London as per the 2011 Census. It clearly shows that the majority of the population is White (78.8%), with the second largest ethnic group classed as Asian/Asian British (12.7%). The proportion of the population from Mixed/multiple ethnic groups, Black/African/Caribbean/Black British and Other ethnic groups are similar (3.9%, 2.6% and 2.1% respectively).



The White and Black populations are lower than the national averages for England, with differences of 6.8% and 0.9% respectively. The other ethnic group categories are higher than the national averages, with the greatest difference occurring for the Asian population which is 4.9% higher²⁹.

As mentioned above, it should be noted that this data is not considered representative of the majority of the people likely to be affected by the proposed scheme given the large percentage of commuters regularly travelling to the area, and more specifically the development, rather than residents.

Sensitive receptors

There are no sensitive receptors in proximity to the proposed scheme which are of specific relevance to race.

²⁹ https://www.nomisweb.co.uk/sources/census_2011_ks/report?compare=E09000001

<p>What is the proposal’s impact on the equalities aim? <i>Look for direct impact but also evidence of disproportionate impact i.e. where a decision affects a protected group more than the general population, including indirect impact</i></p> <p>There is no clear evidence, data, or rationale that the proposed works would have a disproportionate effect on groups based on race as a protected characteristic. It is acknowledged however that some groups are more at risk of hate crimes than others if the security measures associated with the proposed works are insufficient.</p> <p>Summary: The potential adverse impact would be sufficiently managed through implementation of suitable design measures discussed in the adjacent actions section.</p>	<p>What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?</p> <p>Given that the proposals are at the preliminary design stage (See General Arrangement drawing for more details), it is highly recommended that the following is considered to mitigate any negative impact on different racial groups, when developing the detailed design:</p> <ul style="list-style-type: none"> - Lighting and CCTV: Sufficient levels of lighting and CCTV should be included in the design along Fenchurch Buildings and the pedestrianised section of Billiter Street to further improve safety of users and to account for any blind spots. This is particularly important given that some groups are more at risk of hate crimes than others, therefore such measures could help to deter anti-social behaviour such as hate crimes.
<p>Key borough statistics: Our resident population is predominantly white. The largest minority ethnic groups of children and young people in the area are Asian/Bangladeshi and Mixed – Asian and White. The City has a relatively small Black population, less than London and England and Wales. Children and young people from minority ethnic groups account for 41.71% of all children living in the area, compared with 21.11% nationally. White British residents comprise 57.5% of the total population, followed by White-Other at 19%.</p>	<p>The second largest ethnic group in the resident population is Asian, which totals 12.7% - this group is fairly evenly divided between Asian/Indian at 2.9%; Asian/Bangladeshi at 3.1%; Asian/Chinese at 3.6% and Asian/Other at 2.9%. The City of London has the highest percentage of Chinese people of any local authority in London and the second highest in England and Wales. The City of London has a relatively small Black population comprising 2.6% of residents. This is considerably lower than the Greater London wide percentage of 13.3% and also smaller than the percentage for England and Wales of 3.3%. See ONS Census information or Greater London Authority projections.</p>

Religion or Belief

Check this box if NOT applicable

Religion or Belief - Additional Equalities Data (Service Level or Corporate) *Include data analysis of the impact of the proposals*

Census 2011 data shows the percentages of the population in the City of London who identify as a particular religion. They are as follows:

- Christian: 45.3%;
- No religion: 34.2%;
- Religion not stated: 8.8%;
- Muslim: 5.5%;
- Jewish: 2.3%;
- Hindu: 2%;
- Buddhist: 1.2%;
- Other religion: 0.4%; and
- Sikh: 0.2%.

The majority of the population identify as Christian. The second highest proportion of the population identify as having no religion, and the third highest proportion of the population have not stated a religion. This aligns with the averages for England (Christian: 59.4%, No religion: 24.7% and Religion not stated: 7.2%). As determined by the Annual Population Survey, the employment rate by religion estimates for 2018 show the percentage of the population in England identifying as having no religion to have the highest employment rate at 77.3%, followed by those who identify as Hindu at 76.2% and then those identifying as Christian at 76%.³⁰

As mentioned above, it should be noted that this data is not considered representative of the majority of the people likely to be affected by the proposed scheme given the large percentage of commuters regularly travelling to the area, and more specifically the development, rather than residents.

Sensitive receptors

There are several places of worship in the surrounding area of the proposed scheme servicing members of this protected characteristic group. Those in closest proximity are as follows:

- The Guild Church of St Katherine Cree – 100 metres northeast of the proposed scheme
- St Andrew Undershaft Church – 120 metres northwest of the proposed scheme
- St Katherine Coleman Church – 120 metres southeast of the proposed scheme
- St Helen's Bishopsgate – 200 metres north of the proposed scheme
- Bevis Marks Synagogue – 200 metres north of the proposed scheme
- St Olave's Church – 200 metres south of the proposed scheme
- All Hallows by the Tower – 370 metres south of the proposed scheme

³⁰ <https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/religion/datasets/religioneducationandworkinenglandandwales>

- St Clements Church – 450 metres southwest of the proposed scheme
- St Margaret’s Church – 500 metres west of the proposed scheme

What is the proposal’s impact on the equalities aim? *Look for direct impact but also evidence of disproportionate impact i.e. where a decision affects a protected group more than the general population, including indirect impact*

There is no clear evidence, data, or rationale that the proposed works would have a disproportionate effect on groups based on religion or belief as a protected characteristic. It is acknowledged however that some groups are more at risk of hate crimes than others if the security measures associated with the proposed works are insufficient.

Construction:

Noise associated with the construction of the works could have a negative impact on places of worship during services and religious holidays.

Summary:

The potential adverse operational impact would be sufficiently managed through implementation of suitable design measures discussed in the adjacent actions section.

Key borough statistics – sources include:

The ONS website has a number of data collections on [religion and belief](#), grouped under the theme of religion and identity.

[Religion in England and Wales provides a summary of the Census 2011 by ward level](#)

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

Given that the proposals are at the preliminary design stage (see General Arrangement drawing for more details), it is highly recommended that the following is considered to mitigate any negative impact on religion or belief as a protected characteristic, when developing the detailed design:

- Lighting: Sufficient levels of lighting should be included in the design along Fenchurch Buildings and the pedestrianised section of Billiter Street to further improve safety of users and to account for any blind spots. This is particularly important given that some groups are more at risk of hate crimes than others, therefore such measures could help to deter anti-social behaviour such as hate crimes.

In addition to this, places of worship located near to the site should be included in the stakeholder list and be informed of any out of hours works, allowing consideration of service times and religious holiday’s during the construction phase.

Sex

Check this box if NOT applicable

Sex – Additional Equalities Data (Service Level or Corporate) *Include data analysis of the impact of the proposals*

The Census 2011 reported that males comprised 55.5% of the population in the City of London, whereas females comprised 44.5%. This is in contrast to the national average which shows males comprising 49.2% of the population and females 50.8%, as well as the London average which shows males comprising 49.3% of the population and females 50.7%. This trend of a greater comparative male to female ratio is also shown by the Office for National Statistics (ONS) Mid-2020 population estimates with 54.6% being male and 45.4% being female for the City of London. For the same year, the gender split for the London region was estimated at 50.1% for males and 49.9% for females.

As mentioned above, it should be noted that this data is not considered representative of the majority of the people likely to be affected by the proposed scheme given the large percentage of commuters regularly travelling to the area, and more specifically the development, rather than residents.

What is the proposal's impact on the equalities aim? *Look for direct impact but also evidence of disproportionate impact i.e. where a decision affects a protected group more than the general population, including indirect impact*

There is the potential that insufficient lighting, specifically along Fenchurch Buildings and the pedestrianised section of Billiter Street, could disproportionately affect women in terms of their personal safety. Improving lighting is particularly important given that one in two women feel unsafe walking along after dark in a busy public space, compared to one in five men³¹.

Summary:

The potential adverse impact would be sufficiently managed through implementation of suitable design measures discussed in the adjacent actions section.

Key borough statistics:

At the time of the [2011 Census the usual resident population of the City of London](#) could be broken up into:

- 4,091 males (55.5%)
- 3,284 females (44.5%)

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

Given that the proposals are at the preliminary design stage (See General Arrangement drawing for more details), it is highly recommended that the following is considered to mitigate any negative impact on women when developing the detailed design:

- Lighting: Sufficient levels of lighting should be included in the design along Fenchurch Buildings and the pedestrianised section of Billiter Street to further improve safety of users and to account for any blind spots. This is particularly important given that women tend to feel less safe travelling in the dark and/or independently, therefore such measures could help to improve access to public space and personal safety.

A number of demographics and projections for demographics can be found on the [Greater London Authority website in the London DataStore](#). The site details statistics for the City of London and other London authorities at a ward level:

- [Population projections](#)

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposal.

³¹ <https://www.endviolenceagainstwomen.org.uk/new-data-women-feel-unsafe-at-night/>

Sexual Orientation and Gender Reassignment

Check this box if NOT applicable

Sexual Orientation and Gender Reassignment - Additional Equalities Data (Service Level or Corporate) *Include data analysis of the impact of the proposals*

ONS 2014 survey data displays a self-perceived sexual identity overview for the UK population as follows:

- Heterosexual: 93.5%;
- Didn't answer: 4.7%;
- Lesbian or gay: 1.1%;
- Bisexual: 0.4%; and
- Other: 0.3%.

It also states the London had the highest proportion of adults answering lesbian, gay or bisexual at 2.5%.

Sensitive receptors

There are no facilities providing services to sensitive receptors in proximity to the proposed scheme which are of specific relevance to sexual orientation.

What is the proposal's impact on the equalities aim? *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

There is the potential that insufficient lighting, specifically along Fenchurch Buildings and the pedestrianised section of Billiter Street, could disproportionately affect people based on their sexual orientation and gender reassignment, in terms of their personal safety.

Summary:

The potential adverse impact would be sufficiently managed through implementation of suitable design measures discussed in the adjacent actions section.

Key borough statistics:

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

Given that the proposals are at the preliminary design stage (See General Arrangement drawing for more details), it is highly recommended that the following is considered to mitigate any negative impact on individuals based on their sexual orientation and/or gender reassignment when developing the detailed design:

- Lighting: Sufficient levels of lighting should be included in the design along Fenchurch Buildings and the pedestrianised section of Billiter Street to further improve safety of users and to account for any blind spots. This is particularly important given that some groups are more at risk of hate crimes than others, therefore such measures could help to deter anti-social behaviour such as hate crimes.

- [Sexual Identity in the UK – ONS 2014](#)
- [Measuring Sexual Identity - ONS](#)

Marriage and Civil Partnership

Check this box if NOT applicable

Marriage and Civil Partnership - Additional Equalities Data (Service Level or Corporate) *Include data analysis of the impact of the proposals*

The marriage and civil partnership profile for the City of London borough as reported in the 2011 Census is as follows:

- Single: 50.8%;
- Married: 33.1%;
- Divorced or formerly in a same-sex civil partnership which is now legally dissolved: 7.8%;
- Widowed or surviving partner from a same-sex civil partnership: 4%;
- Separated: 2.6%; and
- In a registered same-sex civil partnership: 1.7%.

The percentage of the population who fall within the Single and Married categories differ from the averages for England, where 34.6% are single and 46.6% are married. This shows the City of London to have a significantly higher number of single people, which aligns with the lower number of people who are married. The other four categories follow the national averages closer, with the differences between the City of London and England being much smaller as follows:

- Divorced or formerly in a same-sex civil partnership which is now legally dissolved: 1.2% lower;
- Widowed or surviving partner from a same-sex civil partnership: 2.9% lower;
- Separated: 0.1% lower; and
- In a registered same-sex civil partnership: 1.5% higher.

As mentioned above, it should be noted that this data is not considered representative of the majority of the people likely to be affected by the proposed scheme given the large percentage of commuters regularly travelling to the area, and more specifically the development, rather than residents.

What is the proposal's impact on the equalities aim? *Look for direct impact but also evidence of disproportionate impact i.e. where a decision affects a protected group more than the general population, including indirect impact*

There is no clear evidence, data, or rationale that the proposed works would have a disproportionate effect on marriage and civil partnership.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

No actions or measures proposed.

Key borough statistics – sources include: <ul style="list-style-type: none">• The 2011 Census contain data broken up by local authority on marital and civil partnership status	

Additional Impacts on Advancing Equality and Fostering Good Relations

Check this box if NOT applicable

Additional Equalities Data (Service Level or Corporate)

Click or tap here to enter text.

Are there any additional benefits or risks of the proposals on advancing equality and fostering good relations not considered above?

Click or tap here to enter text.

What actions can be taken to avoid or mitigate any negative impact on advancing equality or fostering good relations not considered above? Provide details of how effective the mitigation will be and how it will be monitored.

Click or tap here to enter text.

This section seeks to identify what additional steps can be taken to promote these aims or to mitigate any adverse impact. Analysis should be based on the data you have collected above for the protected characteristics covered by these aims.

In addition to the sources of the information highlighted above – you may also want to consider using:

- Equality monitoring data in relation to take-up and satisfaction of the service
- Equality related employment data where relevant
- Generic or targeted consultation results or research that is available locally, London-wide or nationally
- Complaints and feedback from different groups.

Additional Impacts on Social Mobility

Check this box if NOT applicable

Additional Social Mobility Data (Service level or Corporate)

Click or tap here to enter text.

Are there any additional benefits or risks of the proposals on advancing Social Mobility?

Click or tap here to enter text.

What actions can be taken to avoid or mitigate any negative impact on advancing Social Mobility not considered above?

Provide details of how effective the mitigation will be and how it will be monitored.

Click or tap here to enter text.

This section seeks to identify what additional steps can be taken to promote the aims or to mitigate any adverse impact on social mobility. This is a voluntary requirement (agreed as policy by the Corporation) and does not have the statutory obligation relating to protected characteristics contained in the Equalities Act 2010. Analysis should be based on the data you have available on social mobility and the access of all groups to employment and other opportunities. In addition to the sources of information highlighted above – you may also want to consider using:

- Social Mobility employment data
- Generic or targeted social mobility consultation results or research that is available locally, London-wide or nationally
- Information arising from the Social Mobility Strategy/Action Plan and the Corporation's annual submissions to the Social Mobility Ind

Conclusion and Reporting Guidance

Set out your conclusions below using the EA of the protected characteristics and submit to your Director for approval.

If you have identified any negative impacts, please attach your action plan to the EA which addresses any negative impacts identified when submitting for approval.

If you have identified any positive impacts for any equality groups, please explain how these are in line with the equality aims.

Review your EA and action plan as necessary through the development and at the end of your proposal/project and beyond.

Retain your EA as it may be requested by Members or as an FOI request. As a minimum, refer to any completed EA in background papers on reports, but also include any appropriate references to the EA in the body of the report or as an appendix.

This analysis has concluded that ...

It is anticipated that the once complete, the proposed works will provide benefits for protected characteristics including improved accessibility and comfort levels. These improvements would be enjoyed by all users and are likely to particularly benefit groups with protected characteristics related to age and disability.

As detailed throughout the assessment, there are opportunities for enhancement and impact mitigation during the construction phase, which are discussed in Section 2: Recommendations. Further to this, the designs are assessed using the City of London Street Accessibility Tool which has been developed in consultation with key accessibility groups, and our team continues to engage with the developer on a bi-weekly basis to share and address any accessibility concerns. In line with the City of London's existing practices, it is advised that the final detailed design is assessed by the borough's in-house accessibility expert. Given the level of intervention, it is advised that this level of consultation is sufficient.

Outcome of analysis – check the one that applies

Outcome 1

No change required where the assessment has not identified any potential for discrimination or adverse impact and all opportunities to advance equality have been taken.

Outcome 2

Adjustments to remove barriers identified by the assessment or to better advance equality. Are you satisfied that the proposed adjustment will remove the barriers identified.

Outcome 3

Continue despite having identified some potential adverse impacts or missed opportunities to advance equality. In this case, the justification should be included in the assessment and should be in line with the duty to have 'due regard'. For the most important relevant policies, compelling reasons will be needed. You should consider whether there are sufficient plans to reduce the negative impact and/or plans to monitor the actual impact.

Outcome 4

Stop and rethink when an assessment shows actual or potential unlawful discrimination.

Signed off by Director: *Click or tap here to enter text.*

Name: *Click or tap here to enter text.*

Date *Click or tap to enter a date.*