

EQUALITY ANALYSIS (EA) TEMPLATE

Decision

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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 process 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

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What is the Proposal

The City of London Corporation is looking to implement public realm enhancements on Moor Lane to provide greening and an improved pedestrian environment, with the creation of a “linear park” and widened footways. The works will upgrade the existing surface materials to the City’s standard palette to ensure quality and consistency of the City’s streetscape, without altering the traffic movement in the street. Details on the proposed works is provided below. Moor Lane is a local access road and forms part of an established north-south cycle route. The road is closed to motor vehicles during the night and throughout the weekend by a means of a gate at the southern end.

An outline proposal for an enhancement scheme in Moor Lane was included in the original Barbican & Golden Lane Area Enhancement Strategy, approved in 2008. Subsequently an evaluation report (equivalent to Gateway 4-5) for the scheme was approved in 2011. The scheme was then put on hold in 2012 owing to the forthcoming 21 Moorfields development. The design has now been reviewed in conjunction with the Section 278 highway works necessary to accommodate the needs of the 21 Moorfields development which is programmed for completion in early 2023. The Section 278¹ works around 21 Moorfields are funded by the developer and will be undertaken by the City of London’s contractor, FM Conway. The works are due to be completed by 2024.

Proposed Works:

Moor Lane – Western Footway

- Footway widening and resurfacing, using Yorkstone paving, on the western side of Moor Lane between Fore Street and Silk Street
- Implementing multiple planters along the length of Moor Lane between the Barbican estates access roads
- Installation of ‘Rain Gardens’ on the north and south end of the western footway
- Carriageway resurfacing across car park entrances (proposed 40mm mastic asphalt crossover)
- Relocation of five existing Sheffield cycle parking stands
- Installation of seven new Sheffield cycle parking stands at the Moor Street junction with Fore Street (situated on the section of widened footway)
- Removal of police box at the southern end of Moor Lane

¹ [Highways Act 1980 \(legislation.gov.uk\)](#)

- Upgrade and minor adjustments to the lighting on the western footway in line with the Public Realm and Lighting Design² guidelines to accommodate proposed greening

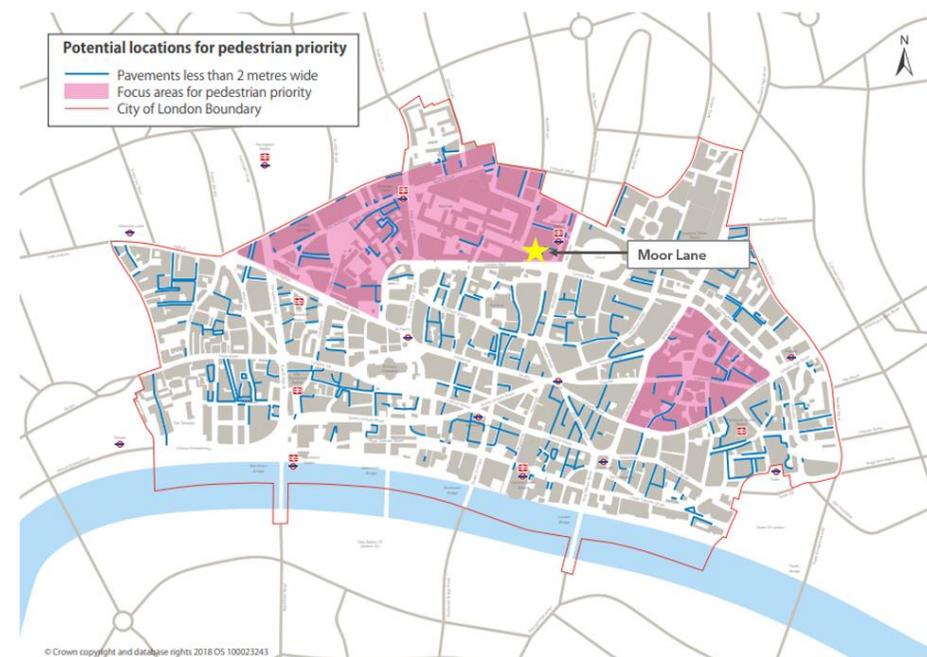
Moor Lane – Eastern Footway

- Footway reconstruction on the eastern side of Moor Lane, outside the development, between the southern access road and just north of New Union Street
- Tree planting and installation of planters
- Installation of multiple HVM security C3 bollards (static) along the boundary of the development
- Implementation of two loading bays and two disabled bays

As mentioned above, this design does not propose any changes to traffic movement in the area and minimal changes are expected to the levels and drainage. In addition to this, the bollards at the southern end of Moor Lane, including the security gate, will be retained as part of the proposed design.

Although small in scale, these works align with the City of London’s Transport Strategy (2019)³ to introduce pedestrian priority streets. Figure 1 illustrates that Moor Lane is in one of the City of London’s Key focus areas for pedestrian priority, in the Moorgate and Barbican Area. The proposed works also align with Proposal 5 of the City’s Transport Strategy³, 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 <https://www.cityoflondon.gov.uk/services/streets/public-realm-and-lighting-design-guidance>

³ [City of London Transport Strategy](#)

1. What are the recommendations?

Given that the proposals are at the preliminary design stage (See Appendix A 101-16100237 – GA2 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:

- **Dropped Kerbs:** In line with the DfT's Inclusive Mobility Guide 2021⁴, it is recommended that appropriate dropped kerbs are provided along the length of Moor Lane to enable easy access for elderly people, particularly those using mobility aids, as well as those travelling with young children in pushchairs. Further to this, it is recommended that dropped kerbs are implemented adjacent to the disabled bays outside 21 Moorfields to enable those with limited mobility and/or mobility aids to comfortably access the site.
- **Tactile Paving:** The extent of tactile paving for the proposed works is yet to be defined however, in line with Department for Transport's (DfT) Inclusive Mobility Guide 2021 guidance⁴ and Guidance on Use of Tactile Paving⁵, it is recommended that tactile paving is in place at each of the junctions of both controlled and uncontrolled crossings to aid visually impaired people.
- **Footway Widths:** Given the central location of Moor Lane and the high footfall associated with nearby trip attractors, it is advised that the renewed footways are the appropriate width to accommodate the existing and any subsequent increase in trip generation and footfall associated with 21 Moorfields. 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 B⁶). This is particularly important along the eastern footway and southern section of the western footway where there is a risk of pinch points and street clutter associated with the existing and proposed bollards, as well as trees and planters.
- **Bollards:** It is understood that the bollards proposed on the eastern footway along the development boundary are 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 whilst providing adequate protection for pedestrians. Bollards should also be at least 1000mm in height and not connected by a chain or rope, as this might present a trip hazard, particularly for those with visual impairments. Bollards should also have tonal/colour contrasted tops and potentially some 'guidance path surfaces' to ensure they are visible and detectable. These recommendations also align with DfT guidance⁴ and Guidance on the Use of Tactile Paving Surfaces⁵. It is understood that the existing bollards at the southern end of Moor Lane are being retained therefore it is recommended that the arrangement of these bollards follow the above guidance also.
- **Cycle Parking:** The type of cycle stands should be considered to include provision that can accommodate cargo bikes, tandems, tricycles, and side-by-side cycles. This could help to encourage users of all abilities to visit the site and surrounding area by bike⁴. Adequate lighting should also be provided to improve security (see lighting below for more details).
- **Greening:** The planting of trees and installation of 'Rain Gardens' and planters is a key part of the proposed scheme. It is therefore recommended that their location and arrangement 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 points⁷. 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. In addition to this, the

addition of seating at the edge of planters and/or rain gardens could also be considered to capitalise on the public realm improvements and shading associated with the greening, and to provide a place to rest for those with limited mobility and stamina.

- **Lighting:** The proposals include upgrading and minor adjustments to the existing lighting on the western footway in line with the Public Realm and Lighting Design Guidelines² to accommodate the proposed greening. Full details on the upgrades/adjustments are not included in the General Arrangement, however it is recommended that Moor Lane is 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. If they are placed on the kerb-side of the footway, they should be at least 450mm away from the edge of the carriageway⁴.
- **Footway Maintenance:** Yorkstone paving is proposed along Moor Lane which may require maintenance. This is because uneven and/or gaps between paving slabs can cause issues for some users, including those who are vision impaired, wheelchair users, and those using crutches and sticks⁴. Vegetation and tree roots can grow between slabs, so this will also need to be regularly monitored and maintained.
- **Construction:** A Construction Environmental Management Plan (CEMP) or Construction Logistics Plan (CLP) should be implemented to minimise construction impacts of the scheme and construction in the local area. It should include measures such as suitable diversion routes with appropriate signage and temporary ramps for any required footway closures, noise and pollution mitigation, and an appropriate CLP to avoid sensitive receptors such as schools. Liaison with stakeholders, including emergency services, should also be 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.
- **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 tactile paving, and that surfaces are flush, and finish is suitable for use.

⁴ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1044542/inclusive-mobility-a-guide-to-best-practice-on-access-to-pedestrian-and-transport-infrastructure.pdf

⁵ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1046126/guidance-on-the-use-of-tactile-paving-surfaces.pdf

⁶ [Pedestrian Comfort Guidance for London \(tfl.gov.uk\)](https://www.tfl.gov.uk/road-works/guidance-for-pedestrians)

⁷ [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1072722/Essex Manual for Streets Redacted.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1072722/Essex_Manual_for_Streets_Redacted.pdf)

2. 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 Coleman Street and Cripplegate Wards. The City of London is a key commercial district, hosting the primary business district for the capital. The proposed scheme is located adjacent to the Barbican Centre, a large performing arts centre, and the Barbican estate, the largest housing area in the City of London, and is also surrounded by key office and retail/hospitality space. Moor Lane is easily accessible via Moorgate London Underground station (two-minute walk), as well as Liverpool Street, Barbican and Bank London Underground 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 6b⁸, those that are likely to be affected by the proposals are pedestrians, cyclists, and other non-motorised users. A large proportion of these users are likely to be of the working population commuting to their places of work. The City of London estimates approximately 513,000 daily commuters⁹ and this specific development, which will provide 564,000 sq. ft of business space, will generate a significant number additional commuter trips to the area. 21 Moorfields will also house a multi-level wellness centre, retail space, and restaurants, attracting recreational users, residents, and tourists, all of whom will be affected by the proposed scheme.

Although a predominantly business district, several other trip generators are located within close proximity of Moor Lane, which will attract users to the area who may also be affected by the proposed works and construction. These include the Barbican Estate, places of worship, schools, and health facilities which have been detailed in the full assessment below. The site is easily accessible by sustainable modes of transport therefore users are most likely to travel to these trip generators on foot, by bike or public transport. Looking more specifically at residents, although the population of the City of London is comparatively small compared to other London boroughs, residents living in the City have the highest overall active, efficient, and sustainable mode share (93%)¹⁰, suggesting that residents are also likely to benefit from the improvements. This includes the approximately 4,000 people who reside within the Barbican Estate, located immediately adjacent to the proposed works.

Moorgate London Underground Station is the nearest station to Moor Lane, located approximately 300 metres from the site. Moorgate is on the Circle, Metropolitan, Hammersmith & City and Northern London Underground Lines, and the Great Northern Line connecting The City to North London and Hertfordshire. Liverpool Street station is also accessible from Moorgate Station. Moorgate has step free access to all lines. The nearest bus stop is 120 metres away on City Wall. This is served by the 8, 11, 25, 26, 76, 100, N8, N11, N25, N26, N242, N551 in both directions. Barbican London Underground Station, about 500 metres from the site, does not have step free access. Barbican is served by the Circle, Metropolitan and Hammersmith and City Lines.

During the construction phase, 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 works may require a short term/temporary road closure, it is not considered that this will lead to access issues for those with protected characteristics. This is because Moor Lane will still be open and vehicle access will be

⁸ https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcat/webcat?Input=Moor%20Lane%2C%20London%2C%20UK&locationId=EhVNb29yIExhbmUsIExvbmRvbiwgVUsiLiosChQKEgIX8P7Oqx2SBEVzse7r6LpIRIUChIJ8_MXt1sbdkgRCrIAOXkukUk&scenario=Base%20Year&type=Ptal

⁹ <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>

¹⁰ <https://content.tfl.gov.uk/travel-in-london-report-13.pdf>

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) 2021¹¹ population statistics for the City of London states a total population of 8,580 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 2021)

Age	City of London %	Greater London %
Under 5 years	2.5%	6%
5 to 15 years	3.9%	12.1%
16 to 24 years	13.8%	12.3%
25 to 64 years	65.8%	57.8%
65 years and over	14.1%	11.9%
Total	100%	100%

This figures above illustrate that the City of London has significantly fewer people under the age of 15 (6.4%) compared to Greater London (18.1%). 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.

¹¹ https://www.nomisweb.co.uk/sources/census_2021_bulk

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. Further to this, the most recent census data (2021) shows that the City of London has a workforce much younger than the rest of the country, with 61% of workers aged between 22 and 39¹².

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:

- City of London School for Girls – 250 metres west of the proposed scheme

¹² <https://www.cityoflondon.gov.uk/assets/Business/city-stats-factsheet-2023.pdf>

- Guildhall School of Music and Drama – 130 metres west of the proposed scheme
- University of Law – London Moorgate – 260 metres north of the proposed scheme
- Bayes Business School – 350 metres north of the proposed scheme
- Bright Horizons Nursery – 450 metres northwest of the proposed scheme
- London School of Business and Finance – 350 metres north of the proposed scheme
- Barbican Playgroup – 200 metres west of the proposed scheme
- Richard Cloudesley School – 350 metres northwest of the proposed scheme
- One5 Health City Private GP Clinic – 300 metres southeast of the proposed scheme
- Broadgate General Practice – 360 metres southeast of the proposed scheme
- Barbican Dental Practice – 200 metres southwest of the proposed scheme
- City Chiropody and Podiatry Barbican – 150 meters west of the proposed scheme
- St Bartholomew’s Hospital – 500 meters west 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*

Research by TfL has found that walking is the most frequently used mode of transport by older Londoners aged 65 and over¹³, with 87% walking at least once a week. Looking at the census data above, a relatively large proportion of the City of London’s population (14.1%) would therefore benefit from the proposals to enhance, green, and improve the pedestrian environment on Moor Lane. Further to this, it is also important to note that the Barbican Estate, located adjacent to the proposed works, consists of a high percentage of single person households, with 32% over 65 years old¹⁴, all of whom could benefit from the improved pedestrian environment on Moor Lane.

The proposals to widen and resurface some of the footways on Moor Lane would be particularly beneficial to elderly people who are more likely to have limited mobility and may be reliant on mobility aids. These individuals require sufficient

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

It is highly recommended that the following is considered to mitigate any negative impact on elderly and younger people when developing the detailed design:

- Dropped Kerbs: In line with the DfT’s Inclusive Mobility Guide 2021⁴, it is recommended that appropriate dropped kerbs are provided along the length of Moor Lane to enable easy access for elderly people, particularly those using mobility aids, as well as those travelling with young children in pushchairs.
- Footway Widths: It is advised that the renewed footways are the appropriate width to accommodate any forecasted increase in footfall associated with the redevelopment at 21 Moorfields. This will prevent vulnerable road users, particularly elderly and younger people¹³, as well as those using mobility aids, from having to cross the road to avoid congestion

¹³ [Travel in London: Understanding our diverse communities 2019 \(tfl.gov.uk\)](https://tfl.gov.uk/what-we-do/our-programmes-and-initiatives/our-travel-research-and-data/travel-in-london-understanding-our-diverse-communities-2019)

¹⁴ <https://kkremoval.co.uk/living-in-barbican/#:~:text=The%20area%20is%20mostly%20populated,being%20of%20the%20White%20race.>

width and quality footway surfacing in order for the space to be accessible and comfortable to use. 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 64¹⁵.

Street trees and planting can also play a key role in helping to remove harmful PM10 particulates and NO2 roadside emissions¹⁶ 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 by¹⁷¹⁸.

Although the City of London has a smaller population under the age of 15 compared to London as a whole, 6.4% compared to 18.1% respectively, children and young people attending the educational establishments located within 500 metres of the proposed works, could also benefit from the improved pedestrian environment on their journeys to school / college.

Looking more specifically at some of these educational establishments, the scheme could be likely to deliver particular benefits to Richard Cloudesely School, as primary school aged pupils are more likely to travel to school by active modes¹⁹, are more at risk of road danger¹³ and their parents are more likely to be travelling with young children in pushchairs. Mode of travel data from the City of London School for Girls also shows that the majority of their pupils travel to school by public transport therefore it is likely that pupils at this school would also benefit from the improved pedestrian environment on their journeys to and from local bus stops and stations²⁰.

Conversely to this however, the proposals to implement a number of bollards, combined with street trees and planters, on the eastern footway could have an adverse impact on those reliant on mobility aids and those travelling with young children/pushchairs as they could potentially create street clutter and obstacles if inappropriately positioned. Similarly, although the design proposes to implement two disabled bays on the eastern side of the carriageway, enabling doorstep access

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 B⁶).

- **Bollards:** It is understood that the bollards proposed on the eastern footway along the development boundary are 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 guidance⁴. In addition to this, it is understood that the existing bollards at the southern end of Moor Lane, near the Fore Street junction, will be retained, which should already be placed at a maximum of 1.2 meters apart, however the location of the bollards and the proposed Rain Garden will need to be considered to maintain sufficient widths and avoid street clutter and pinch points.
- **Greening:** It is recommended that the height of the planters and associated plants, including the species, are considered so to ensure that pedestrians are visible to motorists at all times. This is particularly important at the northern and southern ends of Moor Lane, where the 'Rain Gardens' are located, and where the majority of pedestrian crossing activity is likely to take place (particularly at the northern end where the zebra crossing is located). As above, the positioning of street trees and planters, combined with the aforementioned bollards, on the eastern footway will need to be considered to maintain sufficient widths and avoid street clutter and pinch points. The addition of seating at the edge of planters and/or rain gardens could also be considered to capitalise on could also be considered to capitalise on the public realm improvements and shading associated with

¹⁵ <https://www.ageuk.org.uk/london/about-us/media-centre/facts-and-figures/>

¹⁶ https://www.london.gov.uk/sites/default/files/valuing_londons_urban_forest_i-tree_report_final.pdf

¹⁷ <https://www.unep.org/news-and-stories/blogpost/young-and-old-air-pollution-affects-most-vulnerable>

¹⁸ <https://www.gov.uk/government/publications/health-matters-air-pollution/health-matters-air-pollution>

¹⁹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/476635/travel-to-school.pdf

²⁰ <https://clsg.org.uk/admissions/travelling-to-city/#:~:text=Most%20travel%20by%20public%20transport,can%20be%20found%20under%20FAQs.>

to some of the key trip generators in the area, the design lacks dropped kerbs which can have an adverse impact on how accessible these bays are for elderly, disabled users.

Construction:

Several potential negative impacts on elderly and younger people have been identified if the appropriate measures are not in place during the construction phase²¹. These include:

- Wheelchair and mobility aid users may find it difficult to utilise 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 construction²². Further to this, construction traffic to the site may increase traffic risk to vulnerable road users, which includes both elderly and young people.

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.

Despite the high percentage of Barbican Estate residents being over 65 and the schemes proximity to educational establishments, it should be acknowledged that a high proportion of those visiting the area are likely to be travelling to their place of work. 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.

the greening, and to provide a place to rest for those with limited mobility and stamina.

- **Cycle Parking:** It is recommended that the short stay cycle parking at the southern and northern ends of More Lane should be designed to provide stands that can accommodate cargo bikes, tandems, tricycles and side-by-side cycles, to encourage users of all abilities to visit the area by bike⁴, and ensure the stands are well lit as they are currently located next to an entrance to an underground private car park, which could encourage bike theft. CCTV can also be considered to improve security.
- **Construction:** A CEMP or CLP should be implemented to minimise construction impacts²². 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 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.

²¹ [Transport, health and wellbeing \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

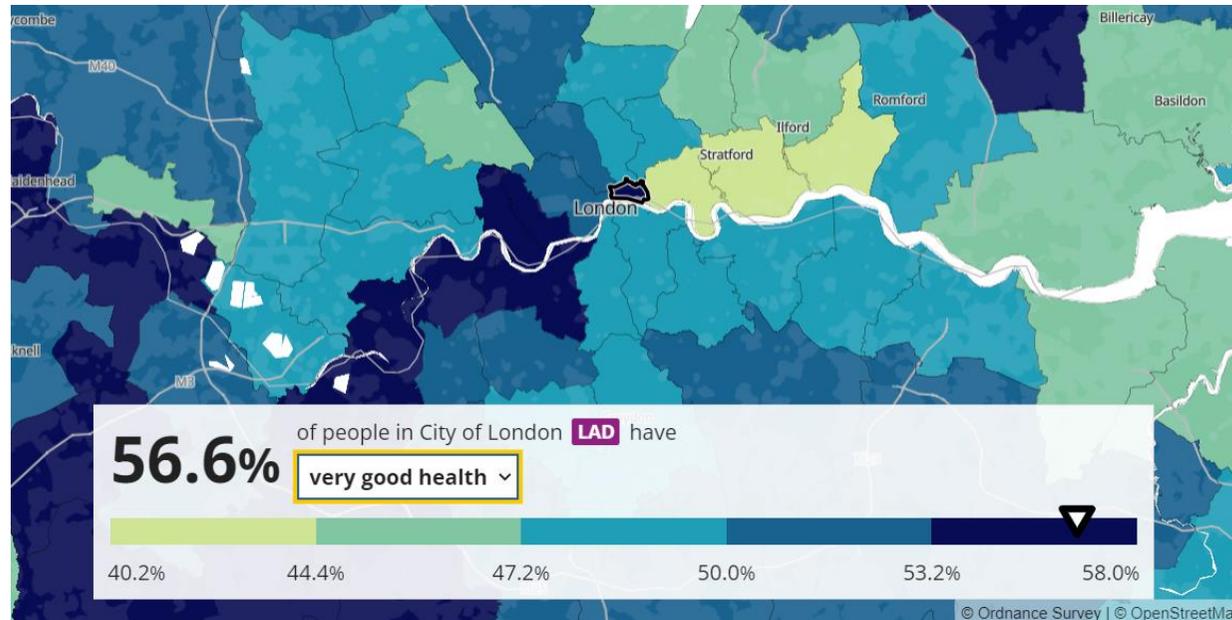
²² [Code of Practice for Deconstruction and Construction Sites \(cityoflondon.gov.uk\)](https://cityoflondon.gov.uk)

<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 762 children and young people under the age of 19 years live in the City. This is 9% 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
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Disability - Additional Equalities Data (Service Level or Corporate) *Include data analysis of the impact of the proposals*

ONS disability and well-being 2021 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 2014 to 2021 showed lower scores for life satisfaction each year²³. Looking at the City of London more specifically, 56.6% of people in the City of London described themselves as having 'very good health' (see Figure 3 below) and just 0.7% reported as having 'very bad health' (Figure 4) and 2.4% as having 'bad health' (Figure 5)²⁴. As shown in the Figures below, compared to other London boroughs, the City of London has one of the highest proportions of people reporting to have 'very good health' and one of the lowest proportions of people reporting to have 'bad' and 'very bad health'.

Figure 3: Percentage of People in the City of London with 'Very good health' (Source: ONS Census data 2021)



²³ <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/disability/datasets/disabilityandwellbeing>

²⁴ <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/healthandwellbeing/bulletins/disabilityenglandandwales/census2021>

Figure 4: Percentage of People in the City of London with 'Very bad health' (Source: ONS Census data 2021)

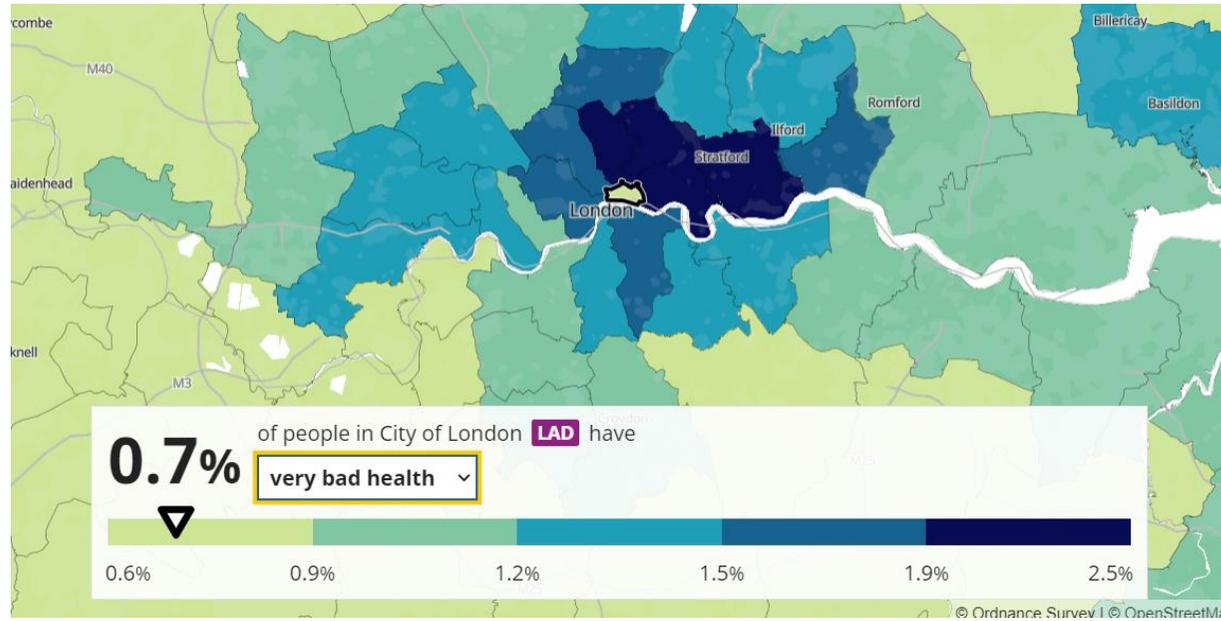
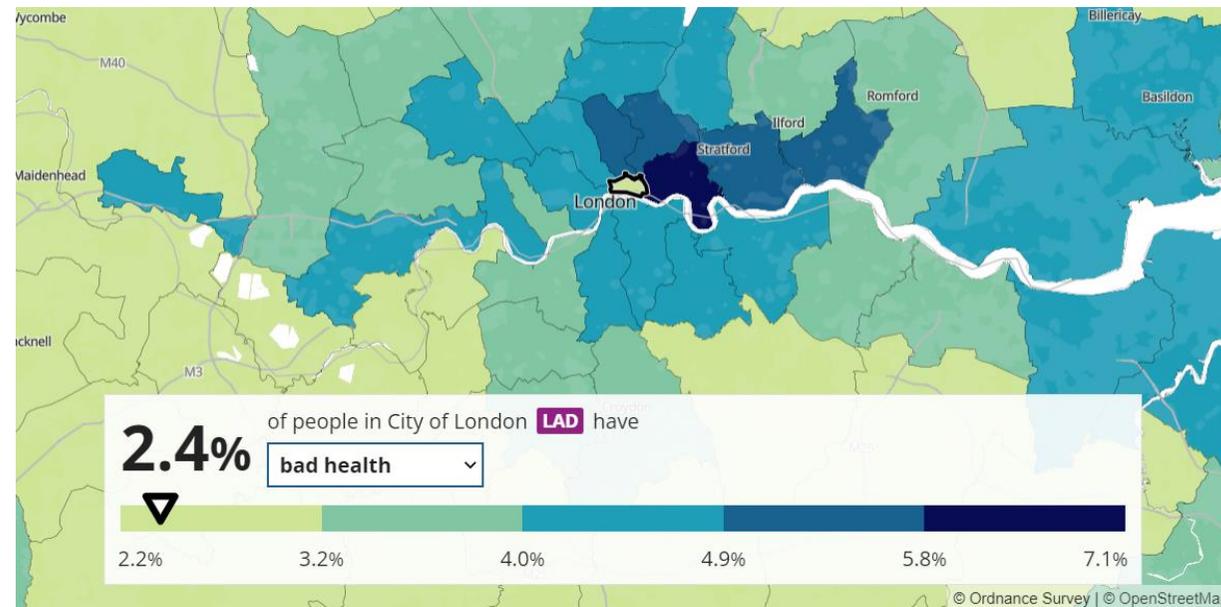
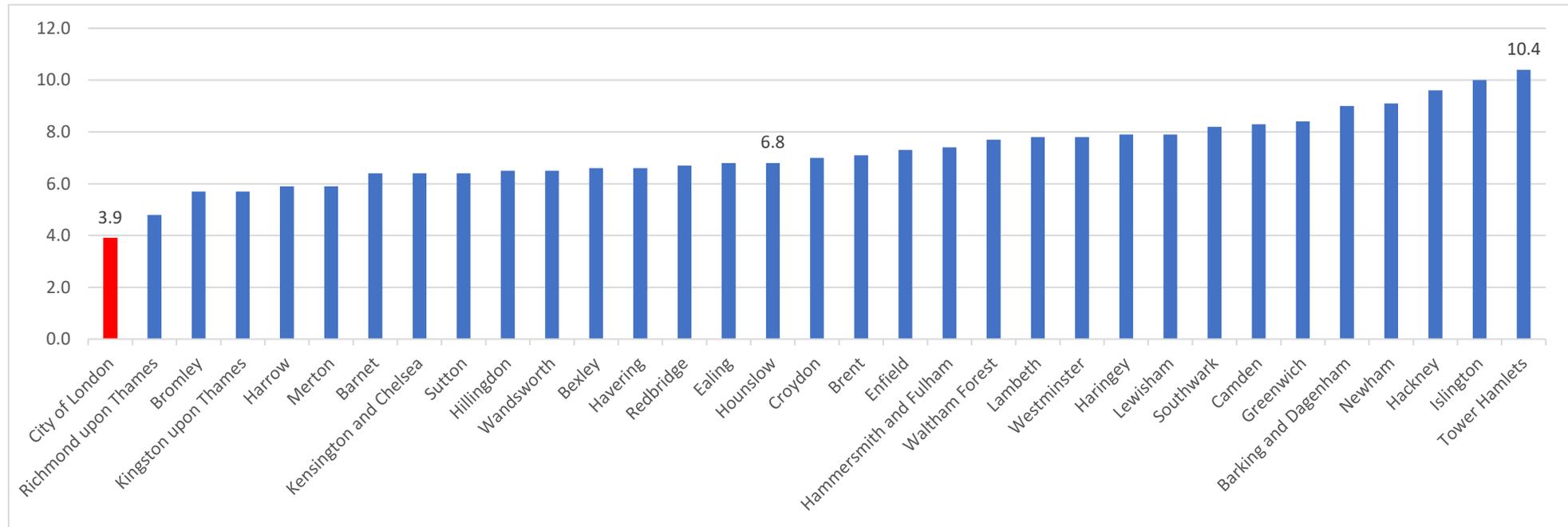


Figure 5: Percentage of People in the City of London with 'Bad health' (Source: ONS Census Data 2021)



Further to this, Figure 6 shows the percentage of the City of London residents who considered their day-to-day activities to be limited by disability or long-term illness compared to other London boroughs. The City of London compared favourably, as it has the lowest percentage at 3.9%.

Figure 6: Disabled under the Equality Act: Day-to-day activities limited a lot (Source: ONS Census 2021)



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 11.8% compared to 17.7% for England. This is considered significantly lower than the national average²⁵.

As mentioned above, it should be noted that this data is not considered entirely representative of the people likely to be affected by the proposed scheme given the large percentage of visitors and commuters regularly travelling to the area, which is likely to be larger than that of the local population. Given that the area is likely to be visited by individuals living outside of the City, due to the area's status as a world class financial centre, 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 autistic²⁶. Further to this, there are over 2 million people in the UK living with sight loss²⁷. With these statistics in mind, it is therefore paramount that the construction of and design of the proposed works considers all users.

²⁵ https://www.localhealth.org.uk/#c=report&chapter=c05&report=r01&selgeo1=lalt_2021.E09000001&selgeo2=eng.E92000001

²⁶ <https://www.london.gov.uk/questions/2022/1716#:~:text=Andrew%20Boff%20AM%3A%20With%20approximately,900%2C000%20Londoners%20with%20neurodivergent%20conditions>

²⁷ <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)

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:

- One5 Health City Private GP Clinic – 300 metres southeast of the proposed scheme
- Broadgate General Practice – 360 metres southeast of the proposed scheme
- Barbican Dental Practice – 200 metres southwest of the proposed scheme
- City Chiropody and Podiatry Barbican – 150 meters west of the proposed scheme
- St Bartholomew’s Hospital – 500 meters west 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 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 Moor Lane 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 2030²⁸. 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 frequently²⁹. It is therefore important that the design considers these requirements, which aligns with the City of London’s Transport

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:

- Dropped Kerbs: In line with the DfT’s Inclusive Mobility Guide 2021⁴, it is recommended that appropriate dropped kerbs are provided along the length of Moor Lane to enable easy access for those with disabilities, particularly those using mobility aids.
- Footway Widths: It is advised that the renewed footways are the appropriate width to accommodate any forecasted increase in footfall associated with the redevelopment at 21 Moorfields. This will prevent vulnerable road users, particularly those with disabilities and those reliant on mobility aids¹³, from having to cross the road to avoid congestion and/or step in the carriageway to pass other pedestrians. Appropriate widths will improve the overall user experience and help to support independent travel. It is recommended that the footway widths are

²⁸ <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/disability/articles/outcomesfordisabledpeopleintheuk/2021>

²⁹ <https://www.cityoflondon.gov.uk/assets/Services-Environment/city-of-london-transport-strategy.pdf>

Strategy proposal to develop and apply the City of London Street Accessibility Standard (see page 52 of the strategy for more information³).

Research by Transport for All³⁰ 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 Mobility⁴ 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.

In line with the Department for Transport's Inclusive Mobility Guide 2021 guidance⁴, 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 others³¹. It is understood that new tactile paving would be implemented at the crossing points along Moor Lane and these designs would be in line with the City of London's Standard Details (See Appendix B), fulfilling these requirements.

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:

designed in conjunction with TfL's Pedestrian Comfort Guidance Technical guide (See Appendix B⁶).

- **Bollards:** It is understood that the bollards proposed on the eastern footway along the development boundary are 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, whilst providing adequate protection for pedestrians. Bollards should also have tonal/colour contrasted tops and potentially some 'guidance path surfaces' to ensure they are visible and detectable. These recommendations also align with DfT guidance⁴ and Guidance on the Use of Tactile Paving Surfaces⁵. In addition to this, it is understood that the existing bollards at the southern end of Moor Lane, near the Fore Street junction, will be retained, which should already be placed at a maximum of 1.2 metres apart, however the location of the bollards and the proposed 'Rain Garden' will need to be considered to maintain sufficient footway widths and to avoid street clutter and pinch points.
- **Greening:** It is recommended that the height of the planters and associated plants, including the species, are considered so to ensure that pedestrians are visible to motorists at all times. This is particularly important at the northern and southern ends of Moor Lane, where the 'Rain Gardens' are located, and where the majority of pedestrian crossing activity is likely to take place (particularly at the northern end where the zebra crossing is located). As above, the positioning of street trees and planters, combined with the aforementioned bollards on the eastern footway will need to be considered to maintain sufficient widths and avoid street clutter and pinch points. In addition to this, 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 addition of seating at the edge of planters and/or 'Rain Gardens' could also be considered to capitalise on could also be considered to capitalise on the public realm improvements and shading associated with the greening, and to provide a place to rest for those with limited mobility and stamina.

³⁰ <https://www.transportforall.org.uk/campaigns-and-research/pave-the-way/>

³¹ [Travel, transport and mobility | RNIB](#)

- Footway widths on both the eastern and western sides of Moor Lane
- The direction of drop kerbs. It is necessary to ensure drop kerbs provide the quickest route across the road to reduce conflict with road vehicles, and that they are positioned appropriately to ensure that visually impaired users are being directed to the footway, rather than into the carriageway
- Distances between the proposed bollards on the eastern footway, as well as distance between cycle parking stands and planters
- Details regarding type of cycle parking stands
- Tree planting and covers on Moor Lane
- Details regarding kerb arrangements adjacent to the disabled bays

Although not under the current proposals, the shared use facility at the southern end of Moor Lane, where Moor Lane meets Fore Street, could be of concern to some disabled users who find shared space between pedestrians and cyclists unsafe.³² The flush kerb at this location is also lacking tactile paving, which poses a road safety concern for some disabled groups, particularly those who are visually impaired.

(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:

During the construction stage, 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. During construction they may need to use a different route. This should be clearly outlined.

- **Cycle Parking:** It is recommended that the current short stay cycle parking on Moor Lane 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 bike⁴. Adequate lighting should be provided also to improve security (see below for more details) and ensure the stands are well lit as they are currently located next to an entrance to an underground private car park, which could encourage bike theft. CCTV can also be considered to improve security.
- **Lighting:** The proposals include upgrading and minor adjustments to the existing lighting on the western footway in line with the Public Realm and Lighting Design Guideline² to accommodate the proposed greening. Full details on the upgrades/adjustments are not included in the General Arrangement, however it is recommended that Moor Lane is 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 kerb-side of the footway, they should be at least 450mm away from the edge of the carriageway⁴.
- **Footway maintenance:** The proposed Yorkstone paving along Moor Lane may require maintenance. The roots of planters and trees along the street will need to be monitored to ensure roots do not push up the pavement. This is important 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 sticks⁴.
- **Shared use:** Although outside the scope of this review, it is recommended that a review of shared use at the southern end of Moor Lane is undertaken to determine if this is suitable at this location and to identify

³² <https://www.transportforall.org.uk/news/victory-department-for-transport-calls-for-shared-space-roads-to-be-halted-in-the-uk/>

<p>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 phase²¹. These include:</p> <ul style="list-style-type: none"> • 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 • Construction can also generate additional dust and pollutants which negatively impact people with respiratory or long-term illnesses <p>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.</p> <p>With regards to construction, 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.</p>	<p>any accessibility and/or road safety concerns associated with interactions between pedestrians and cyclists.</p> <ul style="list-style-type: none"> • Construction: A CEMP or CLP should be implemented to minimise construction impacts²². 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 developer 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.
<p>Key borough statistics: Day-to-day activities can be limited by disability or long-term illness. In the City of London as a whole, 88% 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%).</p> <p>Measures on self-reported health were also collected during the 2021 census for the City of London borough. The responses were categorised into Very Bad, Bad, Fair, Good and Very Good health.</p> <ul style="list-style-type: none"> • 0.7% of the population of The City self-reported as having Very Bad health – a 0.1% decrease from the 2011 census 	<p>The 2021 Census identified that for the City of London’s population:</p> <ul style="list-style-type: none"> • 3.9% had a disability that limited their day-to-day activities a lot • 7.9% had a disability that limited their day-to-day activities a little <p>Source: 2021 Census: Disability, England and Wales - Office for National Statistics (ons.gov.uk)</p>

- 56.6% of the population self-reported as having Very Good health – a rise from 55% in the 2011 census

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*

ONS Conception Statistics, England, and Wales, 2020 provides conception numbers for the City of London. Note these numbers have been combined with the London Borough of Hackney 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%).³³

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)³⁴.

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. The scheme is located near the high-density Barbican Estate, although this makes up a population of 4,000 people compared to over 500,000 visiting the city every day. Furthermore, the Barbican Centre hosts events which may encourage people with young children to visit.

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

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

³³ <https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/conceptionandfertilityrates/datasets/conceptionstatisticsenglandandwalesreferencetables>.

³⁴ [Births in England and Wales: summary tables – Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/birthsinenglandandwales/summarytables)

similar way to those mentioned for the above protected characteristics. Parents with younger children and pushchairs could also benefit from the improvements to the public realm during maternity, as the proposed works would improve the overall pedestrian environment and accessibility, particularly on the eastern side of the footway which is currently closed to pedestrians.

It should be noted however, that the placement and positioning of bollards and trees on the eastern side of the footway could narrow the footway and could therefore impact accessibility, particularly for those travelling with pushchairs and young children.

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

Construction:

It is assumed that the proposed works on the eastern side of the footway will be undertaken within the existing hoarding boundaries, however as shown in Figure 2 above, there are insufficient diversions in place to protect pedestrians, particularly more vulnerable road users including pregnant women and women travelling with pushchairs.

Further to this, 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 on both the eastern and western sides of the footways.

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 phase¹⁹. 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 and their babies.

following is considered to mitigate any negative impact on pregnant women and women with young children when developing the detailed design:

- **Footway Widths:** It is advised that the renewed footways are the appropriate width to accommodate the subsequent increase in trip generation and footfall associated with the new development at 21 Moorfields. 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 B⁶).
- **Lighting and CCTV:** 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 Moor Lane, particularly at the entrances to the access roads on both sides of the footway. CCTV can also be considered to improve safety.
- **Trees and Planters:** 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 points³⁵. They should not block the footway giving adequate risk for a passing buggy. 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. Planters can provide an area to sit, as pregnant people, and those who have just given birth may need to rest often.
- **Maintenance of Paving:** The Yorkstone paving along Moor Lane will need to be well maintained. The roots of planters and trees along the street will need to be monitored to ensure roots do not push up the pavement. This is important because uneven and/or gaps between setts can cause issues for pushchairs.

³⁵ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1072722/Essex_Manual_for_Streets_Redacted.pdf

<p>Summary: 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>	<ul style="list-style-type: none"> • Construction: A CEMP or CLP should be implemented to minimise construction impacts²². 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>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%)³³. 	<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)³⁴.

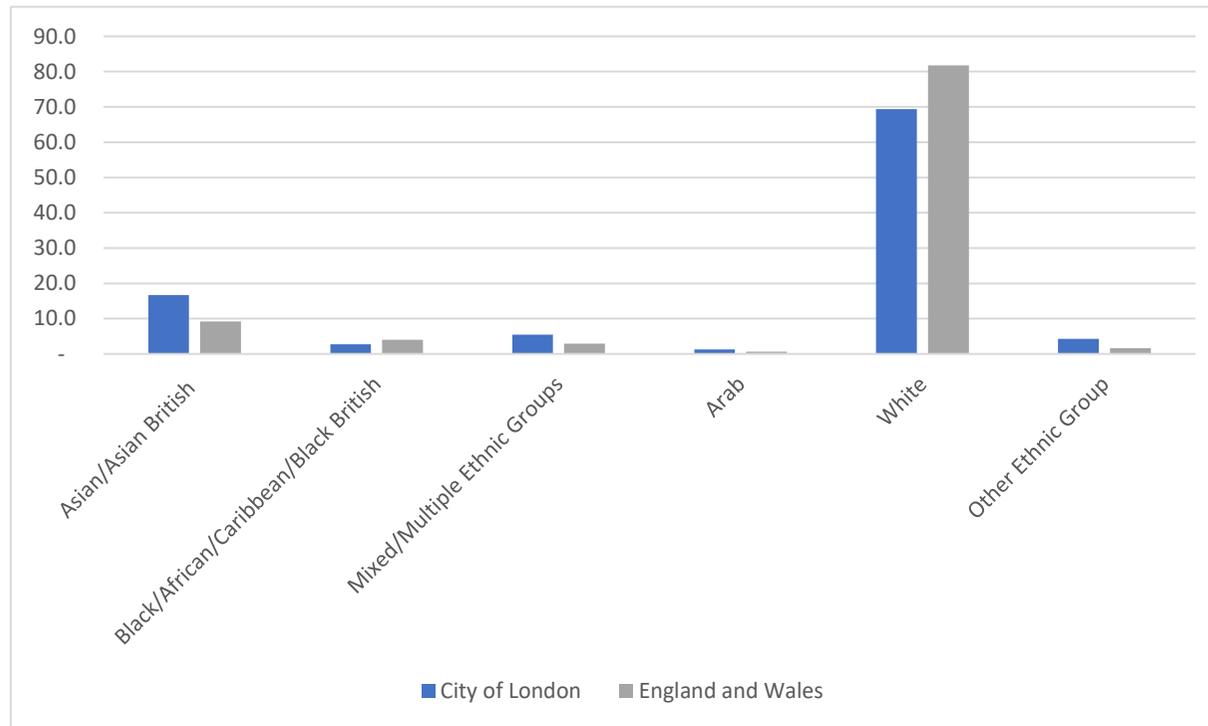
Race

Check this box if NOT applicable

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

Figure 7 shows the ethnic group breakdown for the City of London as per the 2021 Census. It clearly shows that the majority of the population is White (69.4%), with the second largest ethnic group classed as Asian/Asian British (16.7%). The proportion of the population from Mixed/multiple ethnic groups, Black/African/Caribbean/Black British, Other ethnic groups and Arab are similar (5.5%, 2.7%, 4.3% and 1.3% respectively).

Figure 7: City of London Population by Ethnic Group (Source: Census 2021)



The White and Black populations are lower than the national averages for England, with differences of 12.4% and 1.3% respectively. The other ethnic group categories are higher than the national averages, with the greatest difference occurring for the Asian population which is 7.5% higher³⁶.

³⁶ https://www.nomisweb.co.uk/sources/census_2011_ks/report?compare=E09000001

It should be noted that this data is not considered entirely representative of all the people likely to be affected by the proposed scheme given that users are likely to be a combination of residents, particularly of the Barbican Estate, commuters, and visitors.

Sensitive receptors

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

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 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.

Summary:

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

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.

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 different racial groups, when developing the detailed design:

- Lighting and CCTV: Sufficient levels of lighting should be included in the design along Moor Lane, particularly at the entrances to the access roads on both sides of the footway, 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. CCTV can also be considered to improve safety.

The second largest ethnic group in the resident population is Asian, which totals 16.7% - this group is fairly evenly divided between Asian/Indian at 3.7%; Asian/Bangladeshi at 3.3%; Asian/Chinese at 6.3% and Asian/Other at 3%. Asian / Pakistani only accounts for 0.4%.

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.

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 2.7% 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](#).

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 2021 data shows the percentages of the population in the City of London who identify as a particular religion. They are as follows:

- No religion: 43.8%
- Christian: 34.7%;
- Religion not stated: 8.9%;
- Muslim: 6.3%
- Jewish: 2.1%;
- Hindu: 2.6%;
- Buddhist: 1.1%;
- Other religion: 0.4%; and
- Sikh: 0.1%.

The majority of the population identify as non-religious. 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 differs with the averages for England and Wales (Christian: 46.2%, No religion: 37.2% and Religion not stated: 6%). 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%.³⁷

It should be noted however that this data is not considered entirely representative of all the people likely to be affected by the proposed scheme given that users are likely to be a combination of residents, particularly of the Barbican Estate, commuters, and visitors.

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:

³⁷ <https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/religion/datasets/religioneducationandworkinenglandandwales>

- St Giles Cripplegate – 200 metres from the site
- St Lawrence Jewry Church – 380 metres from the site
- Roman Catholic Church of St Joseph – 480 metres from the site
- Trinity Church Central London – 480 metres from the site
- St Margaret’s Church London – 500 metres from the site

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, England and Wales - Office for National Statistics \(ons.gov.uk\)](#)

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 and CCTV:** Sufficient levels of lighting should be included in the design along Moor Lane, particularly at the entrances to the access roads on both sides of the footway, 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. CCTV can also be considered to improve safety.

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 2021 reported that males comprised 55.5% of the population in the City of London, whereas females comprised 44.5%. This contrasts with the national average which shows males comprising 49% of the population and females 51%, as well as the London average which shows males comprising 49.3% of the population and females 50%. For the same year, the gender split for the London region was estimated at 50.1% for males and 49.9% for females.

It should be noted that this data is not considered entirely representative of all the people likely to be affected by the proposed scheme given that users are likely to be a combination of residents, particularly of the Barbican Estate, commuters, and visitors.

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 along Moor Lane could 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 men³⁸.

Summary:

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

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 and CCTV:** Sufficient levels of lighting should be included in the design along Moor Lane, particularly at the entrances to the access roads on both sides of the footway, 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. CCTV can also be considered to improve safety.
- **Greening:** Trees and planters should be well maintained as to not block the view of the street or facilitate hiding spaces and blind spots for people to lurk. In addition to this, the planters and 'Rain Gardens' could

³⁸ <https://www.endviolenceagainstwomen.org.uk/new-data-women-feel-unsafe-at-night/>

	<p>be complemented by seating, making Moor Lane more of a destination rather than a throughfare, and therefore improve levels of natural surveillance. This could be particularly beneficial for women who are more likely than men to make journeys outside peak times and undertake extra unpaid caring responsibilities and are therefore likely to travel with people with other associated protected characteristics.</p>
<p>Key borough statistics: At the time of the 2021 Census (Sex - Office for National Statistics (ons.gov.uk)) population of the City of London could be broken into could be broken up into:</p> <ul style="list-style-type: none"> • 4722 males (55.5%) • 3,816 females (44.5%) 	<p>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:</p> <ul style="list-style-type: none"> • Population projections <p>NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposal.</p>

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 2021 survey data displays a self-perceived sexual identity overview for London’s population and more specifically the City of London’s population, as follows:

London:

- Heterosexual: 86.2%
- Gay or Lesbian: 2.2%
- Bisexual: 1.5%
- Pansexual: 0.4%
- Asexual: 0%
- Queer: 0.1%
- All other sexual orientations: 0%
- Not answered: 9.5%

City of London:

- Heterosexual: 79.3%

- Gay or Lesbian: 7.6%
- Bisexual: 2.3%
- Pansexual: 0.3%
- Asexual: 0.1%
- Queer: 0.1%
- All other sexual orientations: 0%
- Not answered: 10.4%

The data shows that the City of London has a slightly lower percentage of people who identify as heterosexual than London as a whole, 79.3% compared to 85.2% respectively. Conversely, the City of London has a higher percentage of people who identify as Gay or Lesbian, at 7.6% compared to 2.2% for London. This is a similar trend for those identifying as Bisexual; 1.5% for London, compared to 2.3% for the City of London.

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 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.

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 and CCTV:** Sufficient levels of lighting should be included in the design along Moor Lane 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. CCTV can also be considered to improve safety.
- **Trees and Planters:** These should be maintained in such a way that they do not create blind spots where people can lurk out of sight.

Key borough statistics:

- [Sexual orientation, England and Wales - Office for National Statistics \(ons.gov.uk\)](#)
- [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 2021 Census is as follows:

- Single: 48.33%;
- Married: 35.1%;
- 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: 4.69%;
- Separated: 2.38%; 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 37.9% are single and 46.9% 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: 0.4% lower;
- Widowed or surviving partner from a same-sex civil partnership: 1.4% lower;
- Separated: 0.1% lower; and
- In a registered same-sex civil partnership: 1.5% higher.

It should be noted that this data is not considered entirely representative of all the people likely to be affected by the proposed scheme given that users are likely to be a combination of residents, particularly of the Barbican Estate, commuters, and visitors.

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:

- [The 2021 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. 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.*