

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

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

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

## How to carry out an Equality Analysis (EA)

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

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

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

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

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

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

# The Proposal

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|----------------|-------------|------------------|---------------------|
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|----------------|-------------|------------------|---------------------|

## 1. What is the Proposal

The Section 278<sup>1</sup> works around the new development at 1 Leadenhall Street and Whittington Avenue are being undertaken by Brookfield Properties and are due to be completed in 2024. Section 278 allows developers to enter into a legal agreement with the Highway Authority to make permanent changes or improvements to a public highway as part of a planning approval. 1 Leadenhall Street, which will provide 430,000 sq. ft of business space, will generate a significant number of additional commuter trips to the area. As well as office space, the Site will house retail space along Gracechurch Street and a free public terrace, attracting recreational users, residents, and tourists. The new development is also in close proximity to the historic Leadenhall Market therefore large numbers of pedestrians are expected to congregate in and around the market and use Whittington Avenue as a key access route. As part of the development, EV charging points and over 700 bicycle spaces will be provided for users, encouraging active travel and in turn helping to reduce local emissions.

The proposed works, due to start in Spring 2024 currently consist of:

### Leadenhall Street:

- Footway widening and repaving on Leadenhall Street between number 1 Leadenhall Street to the junction with Whittington Avenue
- Footway build out outside number 7-10 Leadenhall Street
- Carriageway resurfacing and reinstatement of road markings on Leadenhall Street between number 1 and 7-10 Leadenhall Street
- Installation of City of London bollards adjacent to uncontrolled crossing point
- Pillars will support the oversailing building and be lined by bollards

### Whittington Avenue:

- Removal of road markings on Whittington Avenue. Existing pedestrian zone restrictions to remain unchanged (pedestrian zone except for permit holders and loading Mon-Fri: 11pm – 10am & Sat-Sun: At any time)
- Repaving of the footways along the length of the street
- Provision of tactile paving at the informal crossing point
- Installation of removable bollards at both ends of the street
- Raising of the carriageway surface to be flush with the footway and repaving in granite setts
- Introducing an informal crossing point at the Whittington Avenue junction with Leadenhall Street

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

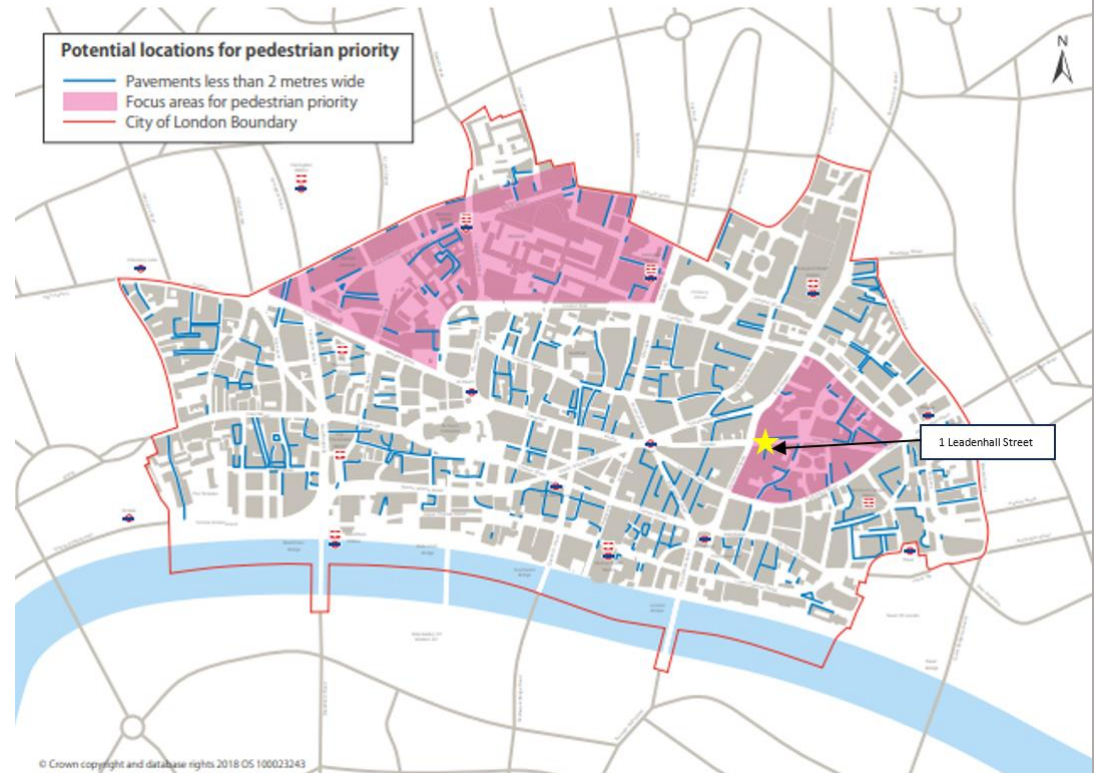
These measures are shown on the '100-16800448-GA 1 LEADENHALL GENERAL ARRANGEMENT PLAN'.

These works align with the City of London's Transport Strategy (2019)<sup>2</sup> to introduce pedestrian priority streets.

Figure 1 illustrates that 1 Leadenhall Street is located within one of the two focus areas for pedestrian priority in the City of London.

The proposed works also align with Proposal 5 of the City's Transport Strategy<sup>2</sup>, 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)**



<sup>2</sup> [City of London Transport Strategy](#)

## 2. What are the recommendations?

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

- **Level Access:** In line with DfT's Inclusive Mobility Guide 2021<sup>3</sup>, it is recommended that level access is provided at the informal crossing on Whittington Avenue to enable easy access for elderly people, those with limited mobility and those using mobility aids and pushchairs.

**CoL Response 4/10/23 – Design already includes a flush footway across Whittington Avenue at the junction with Leadenhall St.**

- **Tactile paving:** In line with Department for Transport's Inclusive Mobility Guide 2021 guidance<sup>3</sup>, it is recommended that the proposed tactile paving at the Whittington Avenue junction with Leadenhall Street adheres to guidance to aid users with visual impairments. 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 others<sup>4</sup>.

**CoL Response 4/10/23 – Tactile paving included complies with the relevant requirements. As its an informal side road crossing, no tails are included.**

- **Footway Widths:** Given the scale of the development, it is advised that the renewed footways are the appropriate width to accommodate the subsequent increase in trip generation and footfall. This will prevent vulnerable road users, which includes people with disabilities, as well as elderly people and young people, from having to cross the road unnecessarily and/or utilise the carriageway, improving road safety for users. It is recommended that the footway widths are designed in conjunction with TfL's Pedestrian Comfort Guidance Technical guide (See Appendix B<sup>5</sup>).

**CoL Response 4/10/23 – PCLs have been calculated for both existing and extended footways on Leadenhall St and they both comply with the guidance. PCLs for Whittington Avenue aren't possible as there's no pedestrian count data available. However, as the development does not have a main entrance here, the carriageway being raised up to be flush and the extremely minimal amount of traffic, its not believed by officers to be a problem.**

- **Bollards:** With regards to the bollards, it is presumed these are included to act as a Vehicle Security Barrier (VSB). If so, these should be placed at a maximum of 1.2 metres apart to enable passage of wheelchair and mobility scooter users, many of whom are more likely to be elderly whilst providing adequate protection for pedestrians. This recommendation also aligns with DfT guidance<sup>3</sup>.

**CoL Response 4/10/23 – The design already aligns with this recommendation.**

<sup>3</sup> [Inclusive Mobility. A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

<sup>4</sup> [Travel, transport and mobility | RNIB](https://www.rnib.org.uk)

<sup>5</sup> [Pedestrian Comfort Guidance for London \(tfl.gov.uk\)](https://www.tfl.gov.uk)

- Maintenance of Setts: The setts proposed along the Whittington Avenue carriageway will need to be regularly maintained. This is because uneven and/or gaps between setts, can cause issues for some users, including those who are vision impaired, wheelchair users, and those using crutches and sticks<sup>3</sup>. This is particularly important given that Whittington Avenue will be used by large vehicles, including HGV's, which are more likely to cause damage to the carriageway, and footfall associated with Leadenhall Market is likely to be high.

**CoL Response 4/10/23 – City Engineers and their contractors are used to this problem and are able to build a running surface resistant to these problems. Furthermore, the Developer is to be charged a commuted maintenance sum so that there's no additional maintenance liability on the City for 20 years.**

- Lighting: Sufficient levels of lighting should be included in the design along Leadenhall Street and Whittington Avenue, particularly within the pedestrian zone to improve the safety of users and account for any blind spots. This is particularly important given that some groups are more at risk of hate crimes and feeling unsafe in public space than others, therefore such measures could help to deter anti-social behaviour such as hate crimes. CCTV can also be considered to improve safety.

**CoL Response 4/10/23 – lighting does not form part of the S278 project, and is instead dealt with by a separate team. Therefore this comment will be passed to them. In regards to CCTV, both streets already have it but they are extremely overlooked and busy so neither is considered to be a risk for users.**

- Construction: A Construction Environmental Management Plan (CEMP) or Construction Logistics Plan (CLP) should be implemented to minimise construction impacts. It should include measures such as suitable diversion routes with appropriate signage for any required footway closures, noise and pollution mitigation, and an appropriate CLP to avoid sensitive receptors such as schools. Continued liaison with stakeholders, including emergency services, should also be 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.

**CoL Response 4/10/23 – These recommendations are standard practice for CoL highways projects so will be undertaken as normal.**

- 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.

**CoL Response 4/10/23 – Due to the scale of the project and the changes involved, a RSA stage 3 will not be undertaken. However, officers will ensure what's constructed will match the design.**



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

The proposed scheme is located in the City of London, within the Aldgate ward. The City of London is a key commercial district, hosting the primary business district for the capital. The area around the proposed scheme also comprises of retail space, most notably Leadenhall Market, as well as restaurants, cafes, and bars. 1 Leadenhall is located within a short distance of Fenchurch Street station (seven-minute walk) and is also accessible by Aldgate, Bank, Monument and Tower Hill stations.

Given the proposed works are located within a key commercial district and the area boasts a high Public Transport Accessibility Level (PTAL) rating of 6b<sup>6</sup>, those that are likely to be affected by the proposals are pedestrians, cyclists, and other non-motorised users. These users are more likely to be of the working population commuting to their places of work. The City of London estimates approximately 513,000 daily commuters<sup>7</sup> and this specific development, which will provide 430,000 sq. ft of business space, will generate a significant number additional commuter trips to the area. Further to this, 1 Leadenhall Street will also house retail space and a public terrace, attracting recreational users, as well as residents and tourists, all of whom will be affected by the proposed scheme. It is also important to note that although the population of the City of London is comparatively small compared to other London boroughs, residents living in the borough have the highest overall active, efficient, and sustainable mode share (93%)<sup>8</sup>, suggesting that residents are also likely to benefit from the improvements.

Although a predominantly business district, several other trip generators are located within close proximity of 1 Leadenhall, which will attract users to the area who may also be affected by the proposed works and construction. These include places of worship, schools, and health facilities which have been detailed in the full assessment below. The site is easily accessible by sustainable modes therefore users are most likely to travel to these trip generators on foot, by bike or public transport.

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

## Age

Check this box if NOT applicable

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

The Office for National Statistics (ONS) 2021<sup>9</sup> population estimates for the City of London states a total population of 8,580 for the borough. The age breakdowns for the City of London and Greater London are detailed in Table 1 below:

<sup>6</sup> <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcat/webcat?Input=1%20Leadenhall%20Street%2C%20London%2C%20UK&locationId=ChIJ7VGP61IDdkgR9w0Pu16EIoI&scenario=Base%20Year&type=Ptal>

<sup>7</sup> <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>

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

<sup>9</sup> [https://www.nomisweb.co.uk/sources/census\\_2021\\_bulk](https://www.nomisweb.co.uk/sources/census_2021_bulk)

**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     | 4.3%             | 12.1%            |
| 16 to 24 years    | 13.4%            | 12.3%            |
| 25 to 64 years    | 65.8%            | 57.8%            |
| 65 years and over | 14%              | 11.9%            |
| <b>Total</b>      | <b>100%</b>      | <b>100%</b>      |

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.

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

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

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

|                |                |             |                  |            |
|----------------|----------------|-------------|------------------|------------|
| <b>70 - 74</b> | 863            | 0%          | 29,485           | 1%         |
| <b>Total</b>   | <b>356,706</b> | <b>100%</b> | <b>4,500,481</b> | <b>100</b> |

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 39<sup>10</sup>.

### 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:

- Drama Classes London – 200 metres east of the proposed scheme
- Finch University – 225 metres west of the proposed scheme
- Lgt Vestra School – 300 metres west of the proposed scheme
- BPP University London City – 200 metres northeast of the proposed scheme
- Bral School of Acting – 100 metres east of the proposed scheme
- School of Business and Technology London – 175 metres north of the proposed scheme
- Kaplan City of London Business School – 500 metres northwest of the proposed scheme
- London School of Banking and Finance – 350 metres south of the proposed scheme
- HCA City Of London Hospital – 200 meters northwest of the proposed scheme
- International Wellbeing Community Medical – 350 metres northwest of the proposed scheme
- Roodlane Medical – 400 meters north of the proposed scheme
- Japan Green Medical Centre – 400 metres northwest of the proposed scheme
- Leightons Hearing Care – 400 metres east of the proposed scheme
- Hearology Liverpool Street – 430 meters north of the proposed scheme
- The Body Balance Clinic – 350 metres south of the proposed scheme
- London Health and Wellbeing - 400 meters north of the proposed scheme

There are also Boots stores in close proximity to the proposed scheme which provide pharmacy facilities. There are no nurseries within 500 metres of the proposed works.

<sup>10</sup> <https://www.cityoflondon.gov.uk/assets/Business/city-stats-factsheet-2023.pdf>

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

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

Research by TfL has found that walking is the most frequently used mode of transport by older Londoners aged 65 and over<sup>11</sup>, with 87% walking at least once a week. Looking at the census data above, a large proportion of the City of London's population (14.1%) would therefore benefit from the proposals to improve the pedestrian environment outside 1 Leadenhall.

Clear, high-quality footways are particularly important for elderly people, who are more likely to be living with a long-term health condition and may have more limited mobility and stamina. Research undertaken by Age UK underlines this intersectionality between age and disability further, with figures showing that 52% of those aged 65 and over are disabled compared with only 9% under 64<sup>12</sup>.

With this in mind, the proposals to renew the footways and retain the restrictions on Whittington Avenue, would benefit both elderly and younger users and help to address some of the key barriers to active travel for the elderly population. It should be acknowledged however that there are some potential pinch points along Whittington Avenue which could negatively affect some elderly users who are reliant on mobility aids as well as adults travelling with young children in pushchairs. There are also some potential pinch points around the bollards in Whittington Avenue which could negatively affect those with using mobility aids or travelling with pushchairs.

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

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

- **Level Access:** In line with the DfT's Inclusive Mobility Guide 2021<sup>3</sup>, it is recommended that level access is provided at the informal crossing in Whittington Avenue to enable easy access for elderly people, particularly those using mobility aids, as well as those travelling with young children in pushchairs.
- **Footway Widths:** Given the scale of the development, it is advised that the renewed footways are the appropriate width to accommodate the subsequent increase in trip generation and footfall. This will prevent vulnerable road users, particularly elderly and younger people<sup>1111</sup>, as well as those using mobility aids, from having to cross the road to avoid congestion and/or step in the carriageway to pass other pedestrians. It is recommended that the footway widths are designed in conjunction with TfL's Pedestrian Comfort Guidance Technical guide (See Appendix B<sup>5</sup>).
- **Maintenance of Setts:** The setts proposed along the Whittington Avenue carriageway will need to be regularly maintained. This is because uneven, loose and/or gaps between setts, can cause issues for some users, including those who are elderly, wheelchair users, those using crutches and sticks<sup>3</sup> and those traveling with young children and pushchairs. This is particularly important given that Whittington Avenue will be used by large vehicles, including HGV's, which are more likely to cause damage to the carriageway.

<sup>11</sup> [Travel in London: Understanding our diverse communities 2019 \(tfl.gov.uk\)](https://www.tfl.gov.uk/road-works/about-us/media-centre/facts-and-figures/)

<sup>12</sup> <https://www.ageuk.org.uk/london/about-us/media-centre/facts-and-figures/>

The use of setts in the carriageway in Whittington Avenue could negatively affect elderly, rely on mobility aids or canes and those with young children and pushchairs. Setts that are not properly maintained can become loose, uneven and/or have gaps between paving. This is of particular importance in consideration of the type of vehicle that will be using Whittington Avenue such as HGVs and LGVs that will be more likely to damage the paving.

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, are likely to benefit from the improved pedestrian environment on their journeys to school / college. This could deliver a particular benefit to pupils attending the establishments located in the area.

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

**Construction:**

Some of the proposed works, particularly those on Whittington Avenue, will be undertaken within the existing hoarding boundaries, however it is assumed that some of the works will require further traffic management. The footway works on Leadenhall Street will require a closure of the footway and pedestrian diversions in place on Leadenhall Street to divert users away from the closed footways. This could have a negative impact on pedestrians, particularly more vulnerable road users including those who are elderly or young.

There is an existing signalised pedestrian crossing with dropped kerb and tactile paving slightly east of the proposed works that can remain open providing a connection between Gracechurch Street and Bishopsgate. A further temporary crossing point may be required to safely divert pedestrians. Currently, temporary ramps and tactiles have also been installed on Whittington Avenue and Leadenhall Street. The quality of the ramps are substandard, which may already pose an accessibility issue for some users and are also likely to affect elderly people during the construction phase.

- **Bollards:** With regards to the bollards located at both ends of Whittington Avenue, as well as those on the footway build out and adjacent to the pillars, it is understood that these are included to act as a Vehicle Security Barrier (VSB). It is also understood that the bollards in Whittington Avenue are removable to allow vehicles through at the allotted times. All bollards, including the temporary slots for the removable bollards, 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.
- **Construction:** A CEMP or CLP should be implemented to minimise construction impacts<sup>14</sup>. 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.

|   |   |
|---|---|
| <p>Building on this, several potential negative impacts on elderly and younger people have been identified if the appropriate measures are not in place during the construction phase<sup>13</sup>. These include:</p> <ul style="list-style-type: none"> <li>• Wheelchair and mobility aid users and those travelling with pushchairs may find it difficult to utilise the temporary ramps</li> <li>• Construction noise can negatively affect elderly and young people</li> <li>• Construction can also generate additional dust and pollutants which negatively impact people with respiratory or long-term illnesses</li> </ul> <p>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 construction<sup>14</sup>. Further to this, construction traffic to the site may increase traffic risk to vulnerable road users, which includes both elderly and young people.</p> <p><b>Summary:</b></p> <p>In summary, the positive impacts associated with the improved pedestrian environment and public realm, are likely to be felt by all users, including residents, visitors, and commuters to the area, regardless of age.</p> <p>With regards to construction, it is recommended that any negative impact on access for elderly and younger people is offset by ensuring that suitable, clear diversions with ramps and appropriate signage are provided. See adjacent section for further details.</p> |   |
| <p><b>Key borough statistics:</b></p> <ul style="list-style-type: none"> <li>• The City of London is dominated by businesses and the residential population is significantly lower compared to other London boroughs.</li> <li>• The City has proportionately more people aged between 25 and 69 living in the Square Mile than in Greater London. Conversely, there are fewer</li> </ul>   | <ul style="list-style-type: none"> <li>• 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.</li> </ul> |

<sup>13</sup> [Transport, health and wellbeing \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

<sup>14</sup> [Code of Practice for Deconstruction and Construction Sites \(cityoflondon.gov.uk\)](https://cityoflondon.gov.uk)

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.

- Summaries of the City of London [age profiles from the 2011 Census can be found on our website](#)

## Disability

Check this box if NOT applicable

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

ONS disability and well-being 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 July 2013 to June 2021 showed lower scores for life satisfaction each year<sup>15</sup>. 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 2 below) and just 0.7% reported as having 'very bad health' (Figure 3) and 2.4% as having 'bad health' (Figure 4)<sup>16</sup>. 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 2: Percentage of People in the City of London with 'Very good health' (Source: ONS Census data 2021)**

<sup>15</sup> <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/disability/datasets/disabilityandwellbeing>

<sup>16</sup> <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/healthandwellbeing/bulletins/disabilityenglandandwales/census2021>

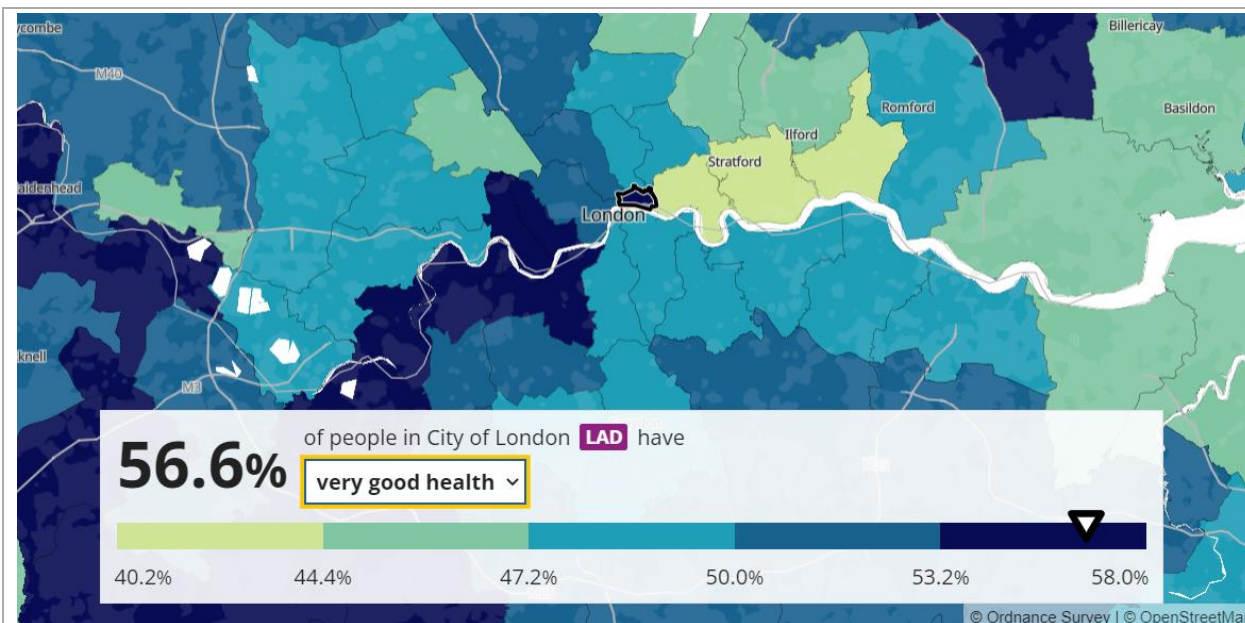


Figure 3: Percentage of People in the City of London with 'Very bad health' (Source: ONS Census data 2021)



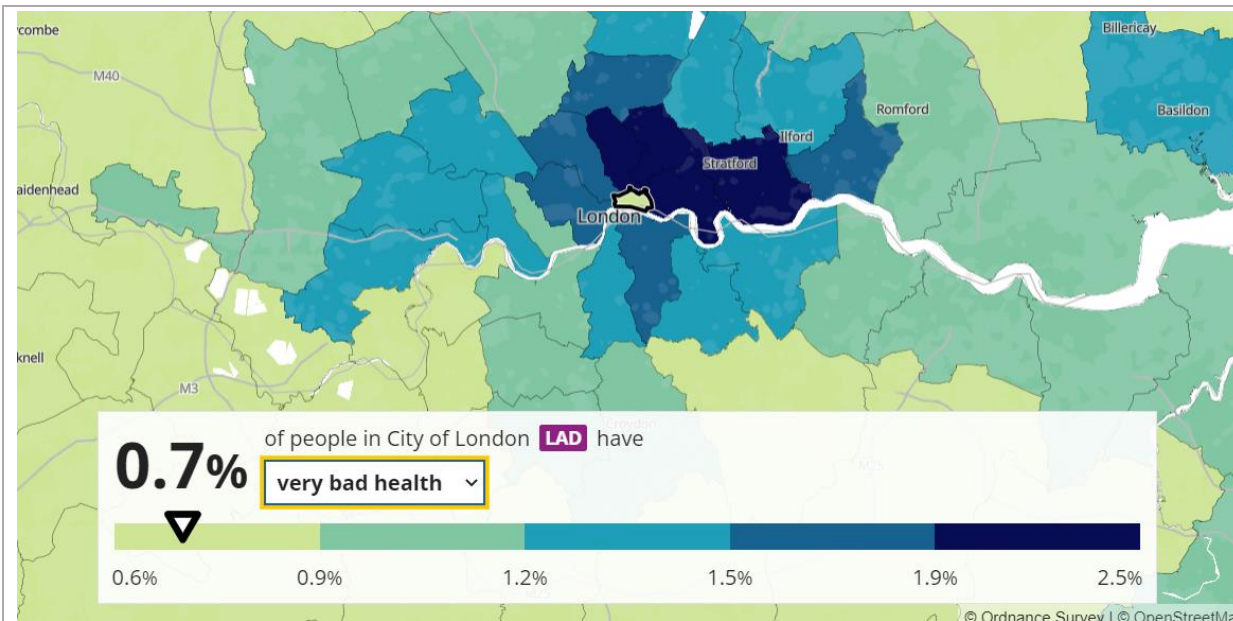
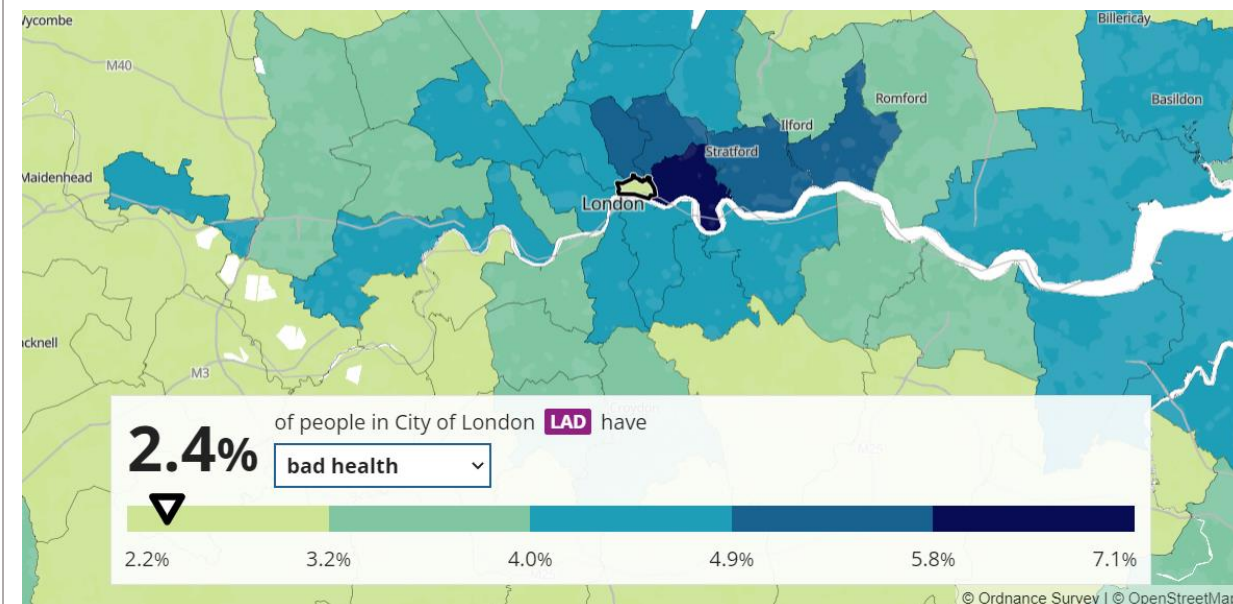
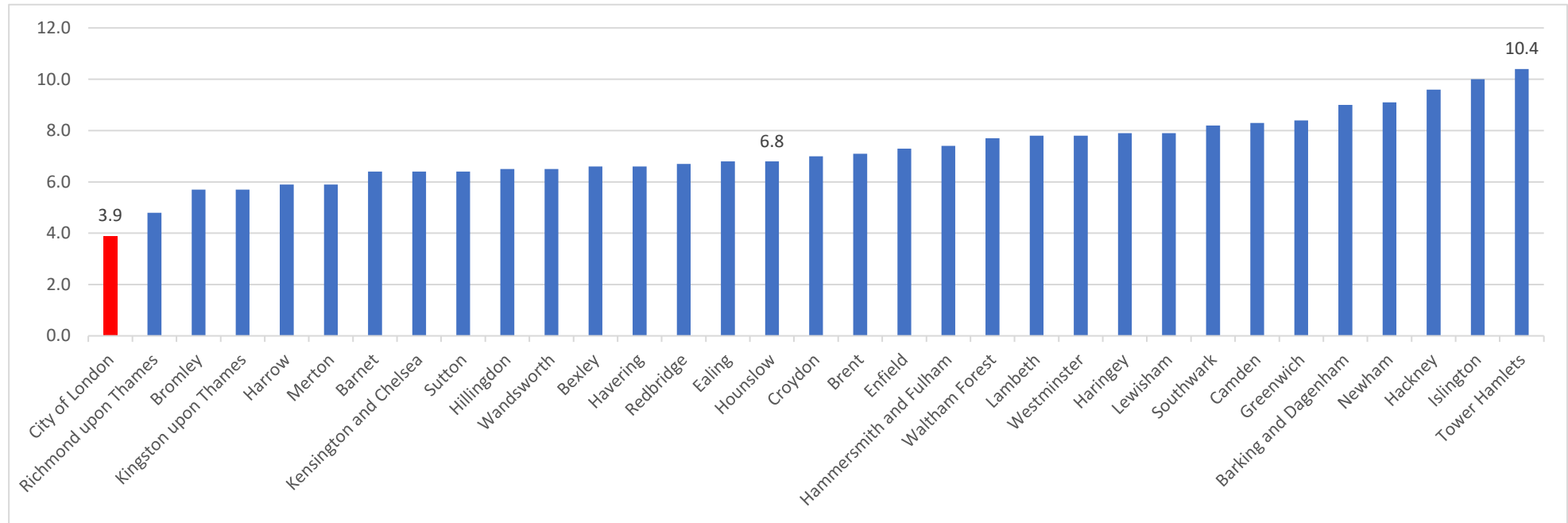


Figure 4: Percentage of People in the City of London with 'Bad health' (Source: ONS Census Data 2021)



Furthermore, Figure 5 shows the percentage of the City of London residents who considered their day-to-day activities limited a lot due to disability or long-term illness compared with other London boroughs. The City of London compares favourably as it has the lowest percentage at 3.9%.

**Figure 5: 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 better than the national average<sup>17</sup>.

As mentioned above, it should be noted that this data is not considered representative of the majority of the people likely to be affected by the proposed scheme given the large percentage of commuters regularly travelling to the area, and more specifically the development, rather than residents. Given that the area is likely to be visited by individuals living outside of the City, it is important to note that approximately one in ten individuals are estimated to be neurodivergent in Greater London (equating to approximately 900,000), and one-tenth of those are possibly autistic<sup>18</sup>. Further to this, there are over 2 million people in the UK living with sight loss<sup>19</sup>. With these statistics in mind, it is therefore paramount that the construction of and design of the proposed works considers all users.

Sensitive receptors

<sup>17</sup> [https://www.localhealth.org.uk/#c=report&chapter=c05&report=r01&selgeo1=ialt\\_2021.E09000001&selgeo2=eng.E92000001](https://www.localhealth.org.uk/#c=report&chapter=c05&report=r01&selgeo1=ialt_2021.E09000001&selgeo2=eng.E92000001)

<sup>18</sup> <https://www.london.gov.uk/questions/2022/1716#:~:text=Andrew%20Boff%20AM%3A%20With%20approximately,900%2C000%20Londoners%20with%20neurodivergent%20conditions>

<sup>19</sup> <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)

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:

- HCA City of London Hospital – 200 meters northwest of the proposed scheme
- International Wellbeing Community Medical – 350 metres northwest of the proposed scheme
- Roodlane Medical – 400 meters north of the proposed scheme
- Japan Green Medical Centre – 400 metres northwest of the proposed scheme
- Leightons Hearing Care – 400 metres east of the proposed scheme
- Hearology Liverpool Street – 430 meters north of the proposed scheme
- The Body Balance Clinic – 350 metres south of the proposed scheme
- London Health and Wellbeing - 400 meters north of the proposed scheme

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

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

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

The informal crossing point at the Whittington Avenue and Leadenhall Street junction is being upgraded to include dropped kerbs and tactile paving. At present, there is a temporary dropped surface and tactiles, which do not appear to adhere to guidance standards, therefore the proposals will improve the accessibility for disabled users, particularly those with visual impairments and those relying on mobility aids.

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 1 Leadenhall and the surrounding area than the data suggests. This is likely to be facilitated by the accessibility of the area by public

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

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

- Tactile paving: In line with Department for Transport's Inclusive Mobility Guide 2021 guidance<sup>3</sup>, it is recommended that the proposed tactile paving at the Whittington Avenue junction with Leadenhall Street adheres to guidance to aid users with visual impairments. 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 others<sup>23</sup>.
- Level Access: In line with the DfT's Inclusive Mobility Guide 2021<sup>3</sup>, it is recommended that level access is provided at the proposed raised

<sup>23</sup> [Travel, transport and mobility | RNIB](#)

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 2030<sup>20</sup>. 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 frequently<sup>21</sup>. It is therefore important that the design considers these requirements, which aligns with the City of London’s Transport Strategy proposal to develop and apply the City of London Street Accessibility Standard (see page 52 of the strategy for more information<sup>2</sup>).

Research by Transport for All<sup>22</sup> 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 or maintained paving stones all contribute to this.

Similarly, these findings are echoed by DfT’s Inclusive Mobility<sup>3</sup> guide, whereby a number of barriers to navigating the pedestrian environment were identified, including obstacles, uneven surfaces, crossing the road, navigating slopes and ramps, and lack of confidence to travel. The guidance also underlines that good, inclusive design benefits all users, including those who have non-visible disabilities.

The proposed footway and public realm improvements associated with the development should help to tackle some of these key barriers, however it should

junctions in Whittington Avenue and for the length of the street, to enable easy access for those with limited mobility and mobility aids.

- **Footway Widths:** Given the scale of the development, it is advised that the renewed footways are the appropriate width to accommodate the subsequent increase in trip generation and footfall. This will prevent vulnerable road users, which includes people with disabilities<sup>1111</sup>, from having to cross the road unnecessarily and/or utilise the carriageway, improving road safety for the users. Appropriate widths will improve the overall user experience and help to support independent travel. It is recommended that the footway widths are designed in conjunction with TfL’s Pedestrian Comfort Guidance Technical guide (See Appendix B<sup>5</sup>).
- **Bollards:** With regards to the bollards located at both ends of Whittington Avenue, as well as those on the footway build out and adjacent to the pillars, it is understood that these are included to act as a Vehicle Security Barrier (VSB). It is also understood that the bollards in Whittington Avenue are removable to allow vehicles through at the allotted times. All bollards, including the temporary slots for the removable bollards, 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 a minimum of 1m in height to ensure they are not a trip hazard for visibly impaired pedestrians. This recommendation also aligns with DfT guidance<sup>3</sup>.
- **Maintenance of Setts:** The setts proposed along the Whittington Avenue carriageway will need to be regularly maintained. This is because uneven, loose and/or gaps between setts, can cause issues for some users, including those who are vision impaired, wheelchair users, and those using crutches and sticks<sup>3</sup>. This is particularly important given that Whittington Avenue will be used by large vehicles, including HGV’s, which are more likely to cause damage to the carriageway. The colour mix of setts should also be considered as it is of particular importance to visibly impaired

<sup>20</sup> <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/disability/articles/outcomesfordisabledpeopleintheuk/2021>

<sup>21</sup> <https://www.cityoflondon.gov.uk/assets/Services-Environment/city-of-london-transport-strategy.pdf>

<sup>22</sup> <https://www.transportforall.org.uk/campaigns-and-research/pave-the-way/>

be acknowledged that there may be some accessibility issues resulting from the proposals. These include:

- Potential pinch points on Whittington Avenue can cause accessibility issues for those who use mobility aids. In line with the DfT's Inclusive Mobility Guide 2021<sup>3</sup>, it is recommended that a minimum footway width of 2m is provided to allow two wheelchair or mobility scooter users to pass each other. If this is not feasible then 1.5m could be regarded as the minimum acceptable. The bollards on Whittington Avenue restrict the footway width, creating a pinch point of approximately 1.5m.
- The use of setts in Whittington Avenue could be an accessibility issue as loose/uneven setts or gaps between setts can cause issues for some users, including those who are vision impaired, wheelchair users, and those using crutches and sticks<sup>3</sup>. This is particularly likely given the type of vehicle that is expected to use this road. It is also important for visually impaired users to have a colour contrast between the footway and carriageway materials.
- The flush footway and carriageway in Whittington Avenue could be an accessibility issue for visually impaired users as there isn't a detectable kerb upstand which allows them to differentiate between footway and carriageway.

*(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.

pedestrians that there is a colour contrast between the footway and carriageway.

- Construction: A CEMP or CLP should be implemented to minimise construction impacts<sup>14</sup>. 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.

Some of the proposed works, particularly those on Whittington Avenue, will be undertaken within the existing hoarding boundaries, however it is assumed that some of the works will require further traffic management. The footway works on Leadenhall Street will require a closure of the footway and pedestrian diversions in place on Leadenhall Street to divert users away from the closed footways. This could have a negative impact on pedestrians, particularly more vulnerable road users including those with disabilities or those who are neurodivergent.

There is an existing signalised pedestrian crossing with dropped kerb and tactile paving slightly east of the proposed works that can remain open providing a connection between Gracechurch Street and Bishopsgate. A further temporary crossing point may be required to safely divert pedestrians. Currently, temporary ramps and tactiles have also been installed on Whittington Avenue and Leadenhall Street. The quality of the ramps are substandard, which may already pose an accessibility issue for some users and are also likely to affect elderly people during the construction phase.

Building on this, several potential negative impacts on people with disabilities have been identified if the appropriate measures are not in place during the construction phase<sup>13</sup>. These include:

- Wheelchair and mobility aid users may find it difficult to utilise the temporary ramps
- Those who are considered sensitive to changes in visual stimuli may find the diversions difficult to navigate
- Construction noise can negatively affect people with autism
- Altered public realm and footway/carrageway 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

**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>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><b>Key borough statistics:</b></p> <p>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"> <li>• 0.7% of the population of The City self-reported as having Very Bad health – a 0.1% decrease from the 2011 census</li> <li>• 56.6% of the population self-reported as having Very Good health – a rise from 55% in the 2011 census</li> </ul> | <p>The 2021 Census identified that for the City of London’s population:</p> <ul style="list-style-type: none"> <li>• 3.9% had a disability that limited their day-to-day activities a lot</li> <li>• 7.9% had a disability that limited their day-to-day activities a little</li> </ul> <p>Source: 2021 Census: <a href="https://www.ons.gov.uk/peoplepopulationandcommunity/disabilitiesandlongtermhealth/birthsdeathsandmarriages/conceptionandfertilityrates/datasets/conceptionstatisticsenglandandwalesreferencetables">Disability, England and Wales - Office for National Statistics (ons.gov.uk)</a></p> |

## Pregnancy and Maternity

Check this box if NOT applicable

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

The ONS Conception Statistics, England and Wales, 2020 show the conception numbers for the City of London. Note these numbers have been combined with the Hackney borough to preserve confidentiality. There were 5,659 conceptions in Hackney and the City of London in 2020. This equates to a conception rate per 1,000 women aged 15 to 44 years of 74.6%. This is slightly higher than the average for Inner London (66.1%) and lower than the average for London as a whole (76.2%).<sup>24</sup>

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)<sup>25</sup>.

<sup>24</sup> <https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/conceptionandfertilityrates/datasets/conceptionstatisticsenglandandwalesreferencetables>.

<sup>25</sup> [Births in England and Wales: summary tables – Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/summarytables)

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

#### Sensitive receptors

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

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

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

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

#### **Construction:**

Some of the proposed works, particularly those on Whittington Avenue, will be undertaken within the existing hoarding boundaries, however it is assumed that some of the works will require further traffic management. The footway works on Leadenhall Street will require a closure of the footway and pedestrian diversions in place on Leadenhall Street to divert users away from the closed footways. This could have a negative impact on pedestrians, particularly more vulnerable road users including pregnant women and those travelling with pushchairs.

Although some existing traffic management is in place, the quality of the temporary ramps provided are substandard, which may already pose an

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

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

- **Level Access:** In line with the DfT's Inclusive Mobility Guide 2021<sup>3</sup>, it is recommended that sufficient dropped kerbs are provided to enable easy access for those travelling with young children in pushchairs.
- **Footway Widths:** Given the scale of the development, it is advised that the renewed footways are the appropriate width to accommodate the subsequent increase in trip generation and footfall. This will prevent vulnerable road users, which includes pregnant women and those travelling with children and pushchairs<sup>11</sup>, from having to cross the road unnecessarily and/or utilise the carriageway, improving road safety for the users. Appropriate widths will improve the overall user experience and help to support independent travel. It is recommended that the footway widths are designed in conjunction with TfL's Pedestrian Comfort Guidance Technical guide (See Appendix B<sup>5</sup>).
- **Bollards:** With regards to the bollards located at both ends of Whittington Avenue, as well as those on the footway build out and adjacent to the pillars, it is understood that these are included to act as a Vehicle Security Barrier (VSB). It is also understood that the bollards in Whittington Avenue



accessibility issue for some users and are also likely to affect pregnant women and those traveling with pushchairs. Pregnant women travelling to health centres or pharmacies in the area may also be affected on their journeys if the appropriate footway diversions are not in place during construction.

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

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

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

**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.

**Key borough statistics:**

- 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

are removable to allow vehicles through at the allotted times. All bollards, including the temporary slots for the removable bollards, should be placed at a maximum of 1.2 metres apart to enable passage of wheelchair and mobility scooter users but also those travelling with pushchairs and young children, whilst providing adequate protection for pedestrians. Bollards should also be a minimum of 1m in height to ensure they are not a trip hazard for visually impaired pedestrians. This recommendation also aligns with DfT guidance<sup>3</sup>.

- Maintenance of Setts: The setts proposed along the Whittington Avenue carriageway will need to be regularly maintained. This is because uneven, loose and/or gaps between setts, can cause issues for some users, including those who are pregnant or traveling with young children and pushchairs. This is particularly important given that Whittington Avenue will be used by large vehicles, including HGV's, which are more likely to cause damage to the carriageway.
- Lighting: Pregnant women and those with pushchairs 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 Leadenhall Street and Whittington Avenue, particularly within the pedestrian zone to account for any blind spots.
- Construction: A CEMP or CLP should be implemented to minimise construction impacts<sup>14</sup>. 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.

- 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)<sup>25</sup>.

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%)<sup>24</sup>.

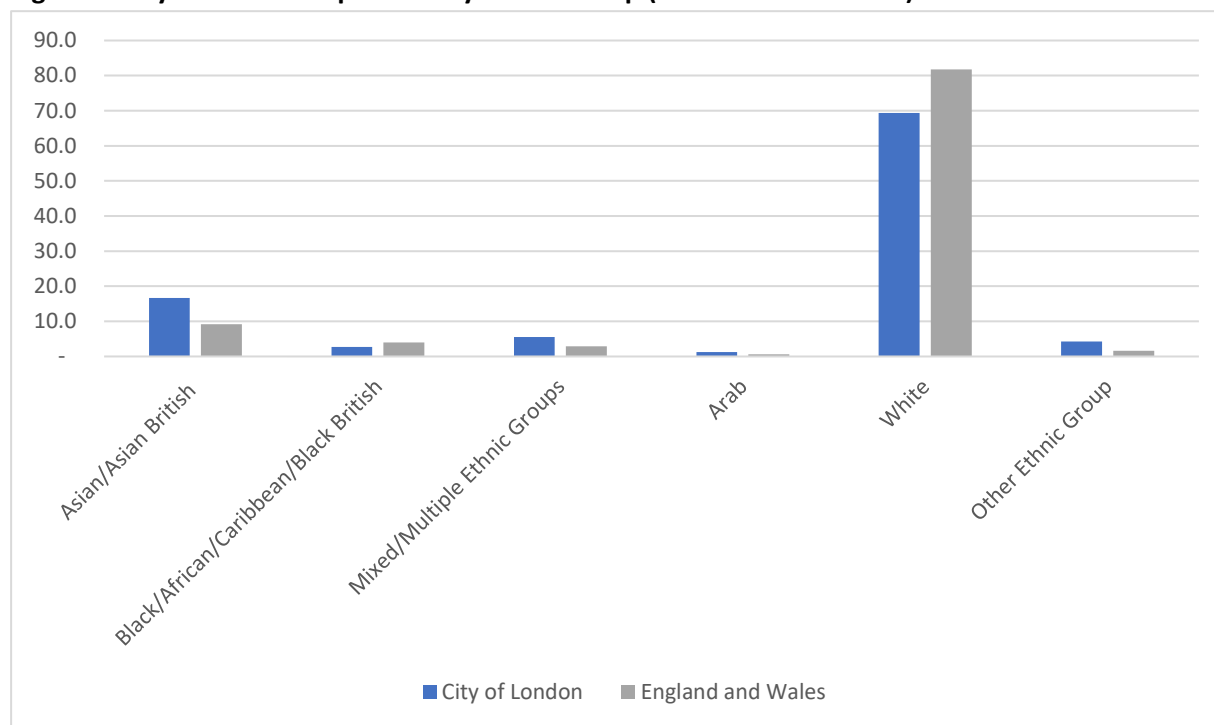
## Race

Check this box if NOT applicable

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

Figure 6 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 and Other ethnic groups and Arab are similar (5.5%, 2.7%, 4.3% and 1.3% respectively).

**Figure 6: 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% higher<sup>26</sup>.

<sup>26</sup> [https://www.nomisweb.co.uk/sources/census\\_2011\\_ks/report?compare=E09000001](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 of the people likely to be affected by the proposed scheme given that users are likely to be a combination of residents, 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.

**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 Leadenhall Street and Whittington Avenue, particularly within the pedestrian zone to improve the safety of users and 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.

**Key borough statistics:**

Our resident population is predominantly white. The largest minority ethnic groups of children and young people in the area are Asian/Bangladeshi and Mixed – Asian and White.

The 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 being Christian, 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%.<sup>27</sup>

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

Sensitive receptors

<sup>27</sup> <https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/religion/datasets/religioneducationandworkinenglandandwales>

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

- The Guild Church of St Katherine Cree – 300 metres northeast of the proposed scheme
- St Andrew Undershaft Church – 180 metres northeast of the proposed scheme
- St Katherine Coleman Church – 350 metres southeast of the proposed scheme
- St Helen’s Bishopsgate – 200 metres north of the proposed scheme
- St Botolph without Bishopsgate – 400 metres north of the proposed scheme
- Bevis Marks Synagogue – 350 metres north of the proposed scheme
- St Olave’s Church – 200 metres south of the proposed scheme
- St Margaret Pattens – 250 metres south of the proposed scheme
- All Hallows by the Tower – 370 metres south of the proposed scheme
- St Clements Church – 280 metres southwest of the proposed scheme
- Dutch Church – 300 metres northwest of the proposed scheme
- St Margaret’s Church – 400 metres northwest of the proposed scheme
- St Mary Woolnorth Church – 300 metres west of the proposed scheme

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

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

**Construction:**

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

**Summary:**

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

**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 Leadenhall Street and Whittington Avenue, particularly within the pedestrian zone to improve the safety of users and 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

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|  | consideration of service times and religious holiday's during the construction phase. |
| <p><b>Key borough statistics – sources include:</b></p> <p>The ONS website has a number of data collections on <a href="#">religion and belief</a>, grouped under the theme of religion and identity.</p> <p><a href="#">Religion in England and Wales provides a summary of the Census 2011 by ward level</a></p> |   |

## 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, particularly in the pedestrian zone, could disproportionately affect women in terms of their personal safety. Improving lighting is particularly important given that one in two women feel unsafe walking along after dark in a busy public space, compared to one in five men<sup>28</sup>.

#### **Summary:**

### **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 Leadenhall Street and Whittington Avenue, particularly within the pedestrian zone to improve the safety of users and account for any blind spots. This is particularly important given that some

<sup>28</sup> <https://www.endviolenceagainstwomen.org.uk/new-data-women-feel-unsafe-at-night/>

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| <p>The potential adverse impact would be sufficiently managed through implementation of suitable design measures discussed in the adjacent actions section.</p>   | <p>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.</p>   |
| <p><b>Key borough statistics:</b><br/> At the time of the 2021 Census (<a href="https://www.ons.gov.uk">Sex - Office for National Statistics (ons.gov.uk)</a>) population of the City of London could be broken into could be broken up into:</p> <ul style="list-style-type: none"> <li>• 4722 males (55.5%)</li> <li>• 3,816 females (44.5%)</li> </ul> | <p>A number of demographics and projections for demographics can be found on the <a href="#">Greater London Authority website in the London DataStore</a>. The site details statistics for the City of London and other London authorities at a ward level:</p> <ul style="list-style-type: none"> <li>• <a href="#">Population projections</a></li> </ul> <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

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| <p><b>Sexual Orientation and Gender Reassignment - Additional Equalities Data (Service Level or Corporate)</b> <i>Include data analysis of the impact of the proposals</i></p> <p>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:</p> <p>London:</p> <ul style="list-style-type: none"> <li>• Heterosexual: 86.2%</li> <li>• Gay or Lesbian: 2.2%</li> <li>• Bisexual: 1.5%</li> <li>• Pansexual: 0.4%</li> <li>• Asexual: 0%</li> <li>• Queer: 0.1%</li> <li>• All other sexual orientations: 0%</li> <li>• Not answered: 9.5%</li> </ul> <p>City of London:</p> <ul style="list-style-type: none"> <li>• Heterosexual: 79.3%</li> <li>• Gay or Lesbian: 7.6%</li> <li>• Bisexual: 2.3%</li> <li>• Pansexual: 0.3%</li> <li>• Asexual: 0.1%</li> </ul> |
|--|

- 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.

#### **Key borough statistics:**

- [Sexual orientation, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk)
- [Measuring Sexual Identity - ONS](https://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 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 Leadenhall Street and Whittington Avenue, particularly within the pedestrian zone to improve the safety of users and 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.



# 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.

**Key borough statistics – sources include:**

- [The 2021 Census contain data broken up by local authority on marital and civil partnership status](#)

**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.



# Additional Impacts on Advancing Equality and Fostering Good Relations

Check this box if NOT applicable

## Additional Equalities Data (Service Level or Corporate)

*Click or tap here to enter text.*

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

*Click or tap here to enter text.*

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

*Click or tap here to enter text.*

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

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

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

# Additional Impacts on Social Mobility

Check this box if NOT applicable

## Additional Social Mobility Data (Service level or Corporate)

*Click or tap here to enter text.*

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

*Click or tap here to enter text.*

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

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

*Click or tap here to enter text.*

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

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

# Conclusion and Reporting Guidance

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

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

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

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

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

## **This analysis has concluded that ...**

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

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

## **Outcome of analysis – check the one that applies**

### **Outcome 1**

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

### **Outcome 2**

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

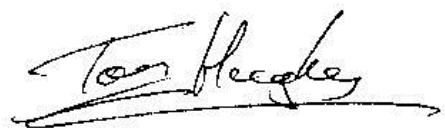
### **Outcome 3**

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

### **Outcome 4**

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

Signed off by Director:



Name: Ian Hughes

Date 14/11/2023