

EQUALITY ANALYSIS (EA) TEMPLATE

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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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1. What is the Proposal

The City of London Corporation (City Corporation) has identified a unique opportunity to create modern facilities for both the City of London Police Headquarters and the Courts, in the heart of Fleet Street¹. The Salisbury Square Development will not only deliver a new purpose-built legal facility and City of London Police Headquarters, it will revitalise and enhance the public spaces for those living, working and visiting the Fleet area.

Central to the Salisbury Square Development is the enhancement and enlargement of the existing Salisbury Square. The revitalised Square will see an enhanced pedestrian route and space, as well as build-on existing greening and introduce seating. The Salisbury Square Development will also deliver improvements to the pedestrian environment on Fleet Street, Salisbury Court, Whitefriars Street, and Primrose Hill.

This EQIA is specific to the highways and public realm works, as outlined in the Salisbury Square Development unilateral agreement (which is in effect a Section 278 agreement). The works are due to be completed in 2026.

The detailed design drawings have been assessed using the City of London Street Accessibility Tool (CoLSAT) and Healthy Streets (HS) Assessment prior to undertaking this assessment.

- The Healthy Streets Approach focuses on creating streets that are pleasant, safe and attractive, where noise, air pollution, accessibility and lack of seating and shelter are not barriers that prevent people (particularly our most vulnerable) from using our streets and spaces.
- The City of London Street Accessibility Tool (CoLSAT) enables street designers to easily identify how street features impact on the different needs of disabled people. The tool's key feature recognises that the needs of different groups of disabled people can be contradictory; that improving accessibility for one group may decrease accessibility for another.

These assessments were undertaken via an on-site audit and the results from the assessments have been incorporated into this EQIA.

¹[The Proposal | Salisbury Square \(salisburysquaredevelopment.co.uk\)](https://www.cityoflondon.gov.uk/what-we-do/development-and-planning/salisbury-square-development)

2. What are the recommendations?

The Proposed Works will include the following improvements to:

Salisbury Square: The Square will be pedestrianised and will feature the following:

- New, multi-stem trees with planting beds
- Drinking fountain
- Benches
- Bollards (both standard and retractable)
- Retention of existing and mature trees

Fleet Street:

- Extended footways at Fleet Street, with kerb line realignment to provide more space for those walking and wheeling
- Renewed footways between Whitefriars Street and Salisbury Court (Yorkstone paving slabs, as per the City Public Realm Technical Manual)
- Fleet Street plinth/benches along the boundary of the Salisbury Square Development, adjacent to Fleet Street
- City Corporation bollards adjacent to Fleet Street
- Two single stem trees adjacent to the building entrance

Salisbury Court:

- Renewed footways (Yorkstone paving slabs) and carriageway (granite setts) between Fleet Street and Dorset Rise
- Renewed raised table with tactiles at the Salisbury Court junction with Fleet Street
- Two informal crossing points, with raised table and tactile paving, providing a connection to Salisbury Square
- City of London bollards at the Salisbury Court junction with Fleet Street
- Retained one way southbound and contraflow cycling
- Two disabled bays (to be retained throughout the lifecycle of the project, or an alternative location identified during the construction phase, for use by those accessing St Bride's Church)

Whitefriars Street:

- Renewed footways (Yorkstone paving slabs) between Fleet Street and Primrose Hill
- Two new vehicle building access points (granite setts)
- Two-way working will be retained as to allow CoL Police access to the headquarters

Primrose Hill:

- Renewed footways (Yorkstone paving slabs)

- City Corporation removable bollards

It is recommended that the following are considered to improve access, inclusivity and safety:

- Setts: Setts being used in the carriageway and at raised tables will need to be monitored and maintained. Uneven, loose and/or gaps between setts, can cause issues for some users, including older people, mobility aid users, those using crutches and canes² and those traveling with young children and pushchairs. This is particularly important if Whitefriars Street and Salisbury Court are used by large vehicles, including refuse/servicing vehicles, which are more likely to cause damage to the carriageway.
- Kerb height: A 50mm kerb height could pose a potential trip hazard to some road users. This risk should be evaluated pre-construction and the appropriate delineation considered to reduce hazard risk.
- Bollards: The proposed bollards adjacent to Fleet Street and those demarcating pedestrianised areas within the development (including Salisbury Square and the north and south passages) should be placed at a maximum of 1.2 metres apart to enable passage of mobility aid users and those travelling with young children/pushchairs, whilst providing adequate protection for pedestrians. This recommendation also aligns with DfT guidance³.
- Street furniture: The location of street furniture, particularly within Salisbury Square, should allow for easy passage for mobility aid users and those travelling with pushchairs. Keeping street furniture to a minimum will provide a simple, legible space which can be beneficial for those who are neurodivergent.
- Greening: Trees and planters should be well maintained as to not block the view of the street or facilitate hiding spaces and blind spots for people to lurk. Consideration should be taken to ensure that the location of the trees is a suitable distance from lighting columns so as not to cause shadows and dark spots on the street. Consideration should be given to the tree species, selecting those with minimal leaf shedding to avoid a slippery footway. This should already be covered within the City Corporation's maintenance regime.
- Cycle Parking: It is recommended that the short stay cycle parking proposed across the site should be designed to provide stands that can accommodate cargo bikes, tandems, and adaptable cycles, such as, tricycles and side-by-side cycles. This will ensure users of all abilities can visit the area by bike². Ensuring the cycle parking is well lit. CCTV can also be considered to improve security for protected groups that may feel more vulnerable at night, such as women, girls, LGBTQ+ people and transgender groups.
- Disabled bays: To ensure the disabled bays are accessible to all, it is essential that dropped kerbs or a raised table are implemented alongside the disabled bays on Salisbury Court. To ensure ongoing accessibility to the disabled bays on Salisbury Court, bay use should be monitored prior to any construction works taking place, and if used, an alternative disabled bay parking provision needs to be identified during the construction period.

² [Inclusive Mobility. A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure \(publishing.service.gov.uk\)](#)

³ [Inclusive Mobility. A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure \(publishing.service.gov.uk\)](#)

- **Lighting and CCTV:** Sufficient levels of lighting should be included in the design, particularly within Salisbury Square and the new passages, to further improve safety of users and to account for any blind spots. This is particularly important given that some groups are more at risk of hate crimes than others, therefore such measures could help to deter anti-social behaviour such as hate crimes. CCTV can also be considered to improve safety.
- **Construction:** A CEMP or CLP should be implemented to minimise construction impacts¹⁴. 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.
- **Road Safety Audit:** A Stage 3 Road Safety Audit should also be completed on completion of the works to ensure that the improvements are safe and accessible.

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 Castle Baynard Ward. The City of London is a key commercial district, hosting the primary business district of the capital. The proposed scheme is located near St. Paul's Cathedral and the Thames and is also surrounded by key office and retail/hospitality space. The Salisbury Square Development is easily accessible via City Thameslink (4-minute walk), as well as Blackfriars London Underground station (7-minute walk).

Given the proposed works are located within a key commercial district and the area boasts a high Public Accessibility Level (PTAL) rating of 6b, those that are likely to be affected by the proposals are pedestrians, cyclists, and other non-motorised users. A large proportion of these users are likely to be of the working population commuting to their places of work, including those working at the new Salisbury Square development. The City of London estimates approximately 614,500 workers⁴ travel to the borough every day, some of which will be travelling to and from Salisbury Square as their place of work. It is estimated that the development will create 400 new jobs in the City of London and support a total of 2,100 jobs as the place for justice, policing, and commercial activity.

Although a predominantly business district, several other trip generators are located within close proximity to Salisbury Square, which will attract users to the area who may also be affected by the proposed works and construction. These include places of worship, a university, and health facilities which have been detailed in the full assessment below. The site is easily accessible by sustainable modes of transport therefore users are most likely to travel to these trip generators on foot, by bike or public transport. Looking more specifically at residents, although the population of the City of London is comparatively small compared to other London boroughs, residents living in the borough have the highest overall active, efficient, and sustainable mode share (93%)⁵, suggesting that residents are also likely to benefit from the improvements.

City Thameslink Train Station is the nearest station to Salisbury Square. Blackfriars London Underground is also accessible from Salisbury Square, which provides access to the Circle and District Lines.

⁴ <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>

⁵ <https://content.tfl.gov.uk/travel-in-london-report-13.pdf>

During the construction phase, some protected characteristic groups, particularly disabled and elderly/younger groups of people, may be adversely impacted if the appropriate pedestrian diversions, noise and pollution mitigation, and CLPs are not in place.

Although the works may require short term/temporary road closures, it is not considered that this will lead to access issues for those with protected characteristics. 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) 2021⁶ population statistics for the City of London states a total population of 8,580 for the borough. The age breakdowns for the City of London and London are detailed in Table 1 below:

Table 1: Age Breakdown for City of London and London (Source: ONS Census Data 2021)

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

The 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.

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%

⁶ https://www.nomisweb.co.uk/sources/census_2021_bulk

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

Table 2 shows the age breakdown of the workforce of the City of London compared to Greater London.

The figures show that the ages of 25-34 contribute a substantial proportion of the workforce at 39%. The same age range for Greater London comprises 31% of the workforce. This shows that the City of London has a greater proportion of young professionals compared to Greater London. Similarly, the 35-49 age group comprises 39% of the workforce in the City of London, compared to 36% of the Greater London workforce. The percentage of the workforce in the City of London aged 50 years and above (14%) is lower than the percentage for Greater London (23%), showing that the City of London has a smaller proportion of older professionals. Further to this, the most recent census data (2021) shows that the City of London has a workforce much younger than the rest of the country, with 61% of workers aged between 22 and 39⁷.

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:

- Fleet Street Clinic – 250 meters west of the proposed scheme.
- Octopus Clinic – 90 meters west of the proposed scheme.
- Arden University – 490 meters north of the proposed scheme.
- Kings College – 490 meters west of the proposed scheme.
- The Maughan Library – 350 meters northwest of the proposed scheme.

The following pharmacies are located near to the site:

⁷ <https://www.cityoflondon.gov.uk/assets/Business/city-stats-factsheet-2023.pdf>

- Lloyds Pharmacy within 600m of the site
- Boots Pharmacy within 800m of the site

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

Given the proposed works are located within a key commercial district and the area boasts a high Public Accessibility Level (PTAL) rating of 6b, the proposed improvements surrounding the development are likely to positively benefit people of all ages, but particularly elderly and younger people and people aged 25 – 50 who make up 67% of the workforce in the City of London.

Research by TfL has found that walking is the most frequently used mode of transport by older Londoners aged 65 and over⁸, 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 surrounding the Salisbury Square Development.

Clear, high-quality footways are particularly important for elderly people, who are more likely to be living with a long-term health condition and/or may have limited mobility and/or 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 64⁹.

With this in mind, the proposals to renew the footways on Fleet Street, Salisbury Court, Salisbury Square, Primrose Hill and Whitefriars Street, would benefit both elderly and younger users and help to address some of the key barriers to active travel for the elderly population. This is complemented by the renewed raised table and tactile paving at the Whitefriars Street and Salisbury Court junction with Fleet

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

It is recommended that the following is considered to mitigate negative impacts:

- **Setts:** Setts being used in the carriageway and at raised tables will need to be monitored and maintained. Uneven, loose and/or gaps between setts, can cause issues for some users, including older people, mobility aid users, those using crutches and canes¹⁵ and those traveling with young children and pushchairs. This is particularly important if Whitefriars Street and Salisbury Court are used by large vehicles, including refuse/servicing vehicles, which are more likely to cause damage to the carriageway. Further to this, the repurposed setts, which require significant cleaning and cutting, will need to be assessed prior to use to ensure they are suitable and do not pose a trip or slip hazard.
- **Kerb height:** A 50mm kerb height could pose a potential trip hazard to some road users, particularly the elderly and young. This risk should be evaluated pre-construction and the appropriate delineation considered to reduce hazard risk.
- **Bollards:** The proposed bollards adjacent to Fleet Street and those demarcating pedestrianised areas within the development (including Salisbury Square and the north and south passages) 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 guidance⁵.

⁸ [Travel in London: Understanding our diverse communities 2019 \(tfl.gov.uk\)](https://www.tfl.gov.uk/roadworks/about-us/media-centre/facts-and-figures/)

⁹ <https://www.ageuk.org.uk/london/about-us/media-centre/facts-and-figures/>

¹⁵ [Travel in London: Understanding our diverse communities 2019 \(tfl.gov.uk\)](https://www.tfl.gov.uk/roadworks/about-us/media-centre/facts-and-figures/)

Street, reinforcing pedestrian priority. The two additional raised tables with tactiles on Salisbury Court, connecting into Salisbury Square, would also provide a safer crossing point for elderly and younger users. These improvements are also likely to benefit elderly and younger users who may use these streets on their journeys to and from the sensitive receptors listed above.

Pedestrianising Salisbury Square and the renewal of the public realm will also benefit older and younger people. The proposed trees, planting and benches provides a pleasant space for people to spend time and for older people to rest, as they are more likely to have limited mobility and/or stamina. Street trees and planting can play a key role in helping to remove harmful PM¹⁰ particulates and NO₂ roadside emissions¹⁰ and mitigating against climate change impacts such as heating of streets (and provision of shaded areas), both of which young people and elderly people are disproportionately affected by¹¹¹².

Two disabled bays are proposed on Salisbury Court, allowing for easy access to Salisbury Square for disabled people who may have limited mobility and/or long-term health conditions.

Additional seating is proposed along Fleet Street, which would provide a resting place along the major through route, again benefiting older people, disabled people or all ages and people who are more likely to have limited mobility and/or stamina.

Multiple bollards are proposed along the Fleet Street boundary, some of which overlap with the tactile paving on the western side of the Salisbury Court junction with Fleet Street. This could cause a potential pinch point / obstacle for older users with limited mobility and those travelling with young children/pushchairs. There is also potential for street clutter/obstacles on Salisbury Square near to the removable bollards. The location of the bollards, coupled with seating, planters, relocated obelisk, cycle parking, and location of the raised table (uncontrolled crossing), could pose a pinch point for mobility aid users and those travelling with pushchairs, if the appropriate widths are not maintained.

- Street furniture: The location of street furniture, particularly within Salisbury Square, should allow for easy passage for mobility aid users and those travelling with pushchairs.
- Greening: Consideration should be given to the tree species, selecting those with minimal leaf shedding to avoid a slippery footway. Street maintenance should already be covered within the City Corporation's maintenance regime.
- Disabled bays: To ensure the disabled bays are accessible to all, it is essential that dropped kerbs or raised tables are implemented alongside the disabled bays on Salisbury Court. To ensure that the disabled bays are made available during the construction phase, at Salisbury Court or at a location in close proximity.
- Cycle Parking: It is recommended that the short stay cycle parking proposed across the site should be designed to provide stands that can accommodate cargo bikes, tandems, tricycles and side-by-side cycles, to encourage users of all abilities to visit the area by bike², and ensure the stands are well lit. CCTV can also be considered to improve security.
- Construction: A CEMP or CLP should be implemented to minimise construction impacts¹⁴. 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.
- 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.

¹⁰ https://www.london.gov.uk/sites/default/files/valuing_londons_urban_forest_i-tree_report_final.pdf

¹¹ <https://www.unep.org/news-and-stories/blogpost/young-and-old-air-pollution-affects-most-vulnerable>

¹² <https://www.gov.uk/government/publications/health-matters-air-pollution/health-matters-air-pollution>

Setts are proposed for the length of the Salisbury Court carriageway. Uneven and/or gaps between setts can cause issues for some users, including for wheelchair users, those using crutches or sticks, and those travelling with young children/pushchairs. This is because vehicles, particularly large vehicles, can damage the carriageway and leave an uneven surface if not maintained, leading to trips and falls. This could be a particular issue at the informal crossing points.

Repurposed setts require significant cleaning and cutting therefore they may not be suitable for use, particularly if they are at risk of posing a trip or slip hazard.

Renewed granite kerbs are proposed across the site. A full height kerb will be maintained on Fleet Street, except at the junctions with Salisbury Court and Whitefriars Street, where continuous crossings are proposed. This ensures older people with limited mobility and those travelling with young children, can cross the road with ease. A 50mm upstand is proposed along the length of Salisbury Court, except at the uncontrolled crossing points. A 50mm upstand could pose a trip hazard for some older and younger road users.

There are some instances where the footway widths go below the recommended two meters (including on the southern section of Whitefriars Street and on Primrose Hill) which can be an issue for mobility aid users and/or those travelling with young children/pushchairs, however it is noted that this is due to the existing building line therefore opportunities for widening the footway are limited.

It should be acknowledged that most 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. It should be acknowledged however that 3.7% of the City's workforce have declared themselves as having a disability¹³, therefore their travel behaviour and experiences may differ.

Construction:

¹³ [Appendix 1 Annual Employee Profile 2020 2021.pdf \(cityoflondon.gov.uk\)](#)

Several potential negative impacts on elderly and younger people have been identified if the appropriate measures are not in place during the construction phase¹⁴. These include:

- Wheelchair and mobility aid users may find it difficult to utilise temporary ramps
- Construction noise can have a negative impact on all users, particularly the elderly and young.
- Construction can also generate additional dust and pollutants which can negatively impact all users, particularly the elderly and young who are more vulnerable to poor air quality

Summary:

In summary, the positive impacts associated with the improved pedestrian environment and public realm, are likely to be felt by all users, including residents, visitors, and commuters to the area, regardless of age.

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

Key borough statistics:

- The City of London is dominated by businesses and the residential population is significantly lower compared to other London boroughs.
- The City has proportionately more people aged between 25 and 69 living in the Square Mile than in Greater London. Conversely, there are fewer younger people. Approximately 762 children and young people under the age of 19 years live in the City. This is 9% of the total population in the area.

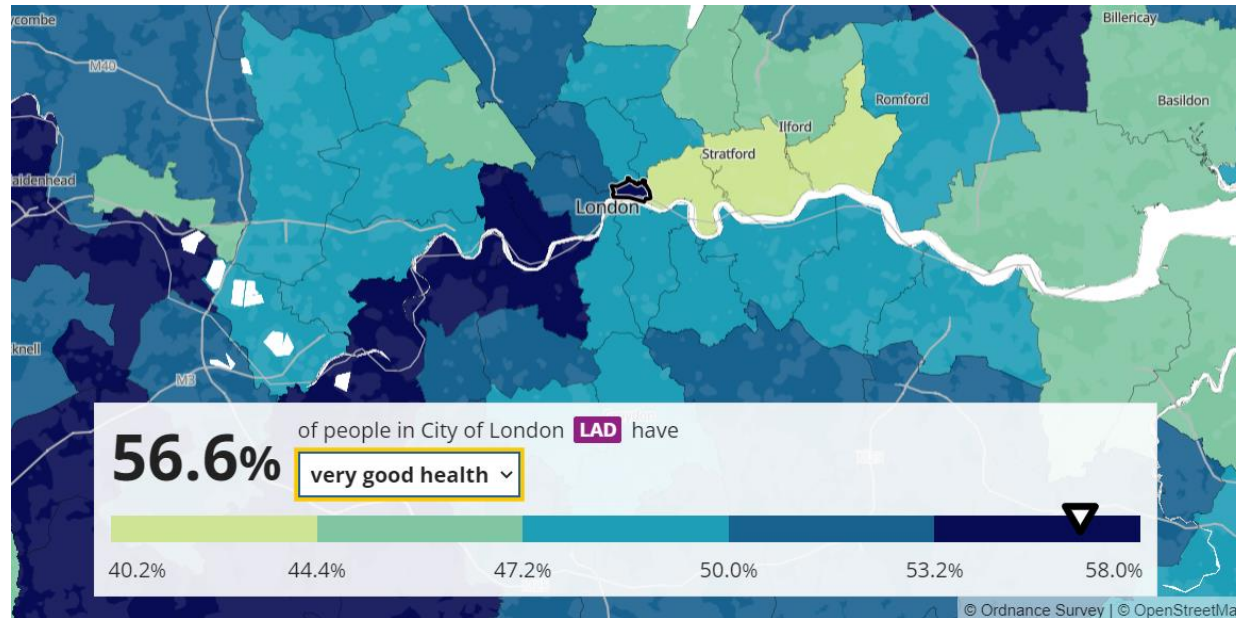
- There is a smaller percentage of younger people (under 25) working in the City of London in comparison to Greater London, as well as a smaller percentage of over 45s. There is a larger percentage working in the City in the 25-44 age bands in comparison to Greater London.
- Summaries of the City of London [age profiles from the 2011 Census can be found on our website.](#)

¹⁴ [Transport, health and wellbeing \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

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

ONS disability and well-being 2021 analysis shows that disability can negatively affect wellbeing. For example, the average well-being ratings for people aged 16 to 64 with a self-reported long-standing illness, condition or impairment which causes difficulty with day-day activities between 2014 to 2021 showed lower scores for life satisfaction each year¹⁶. Looking at the City of London more specifically, 56.6% of people in the City of London described themselves as having 'very good health' (see Figure 3 below) and just 0.7% reported as having 'very bad health' (Figure 4) and 2.4% as having 'bad health' (Figure 5)¹⁷. As shown in the Figures below, compared to other London boroughs, the City of London has one of the highest proportions of people reporting to have 'very good health' and one of the lowest proportions of people reporting to have 'bad' and 'very bad health'.

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



¹⁶ <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/disability/datasets/disabilityandwellbeing>

¹⁷ <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/healthandwellbeing/bulletins/disabilityenglandandwales/census2021>

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

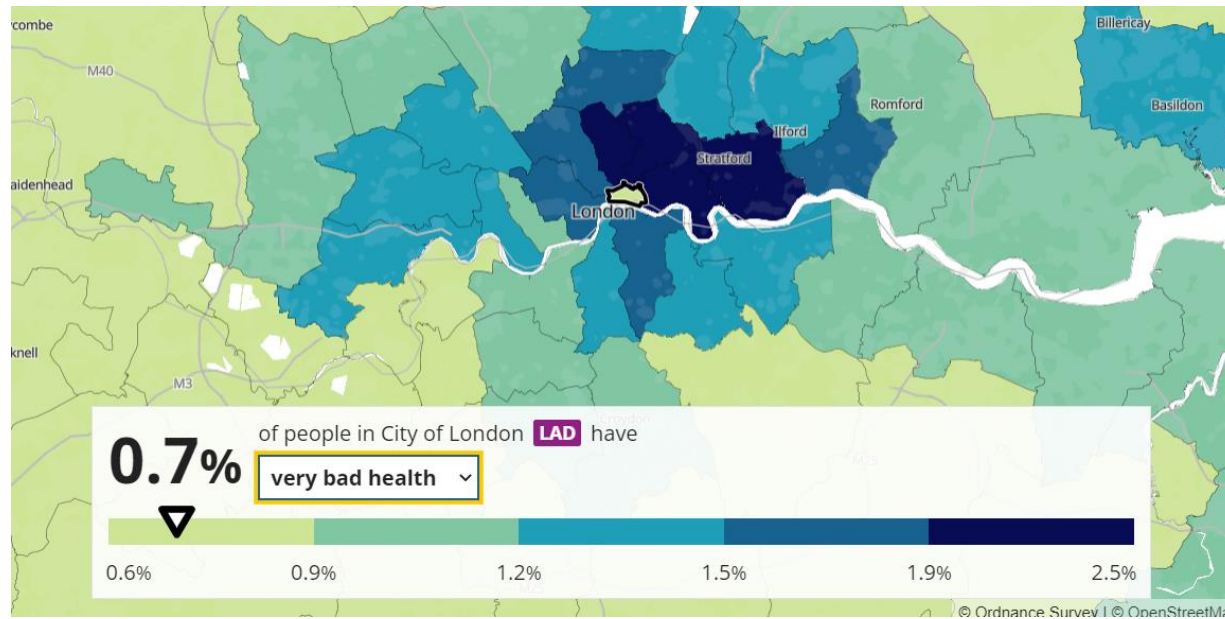
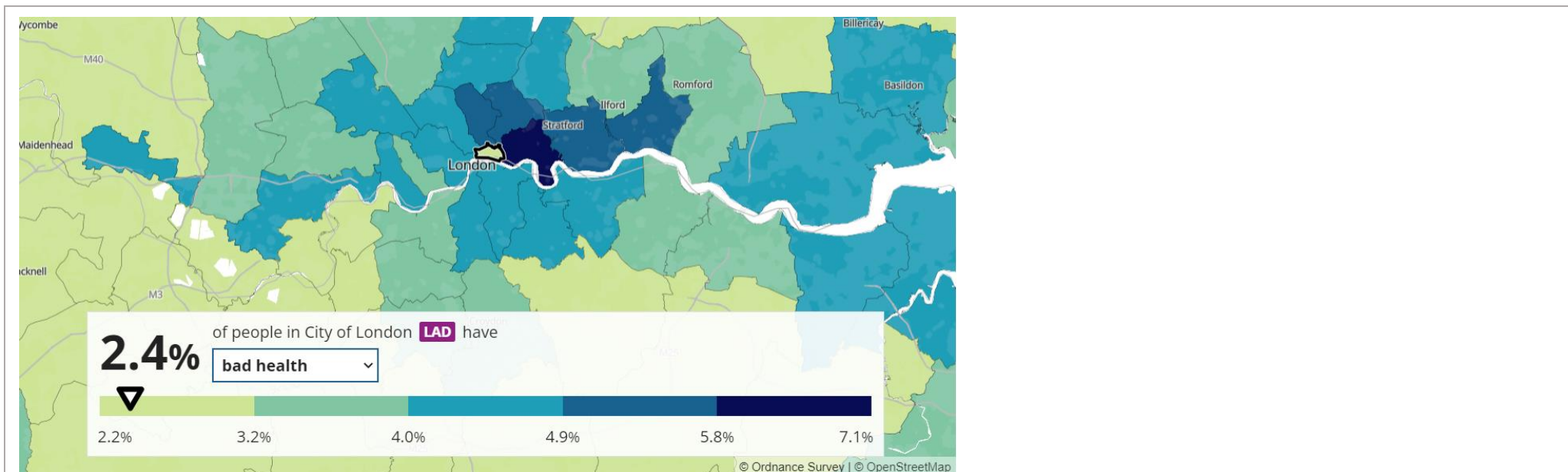
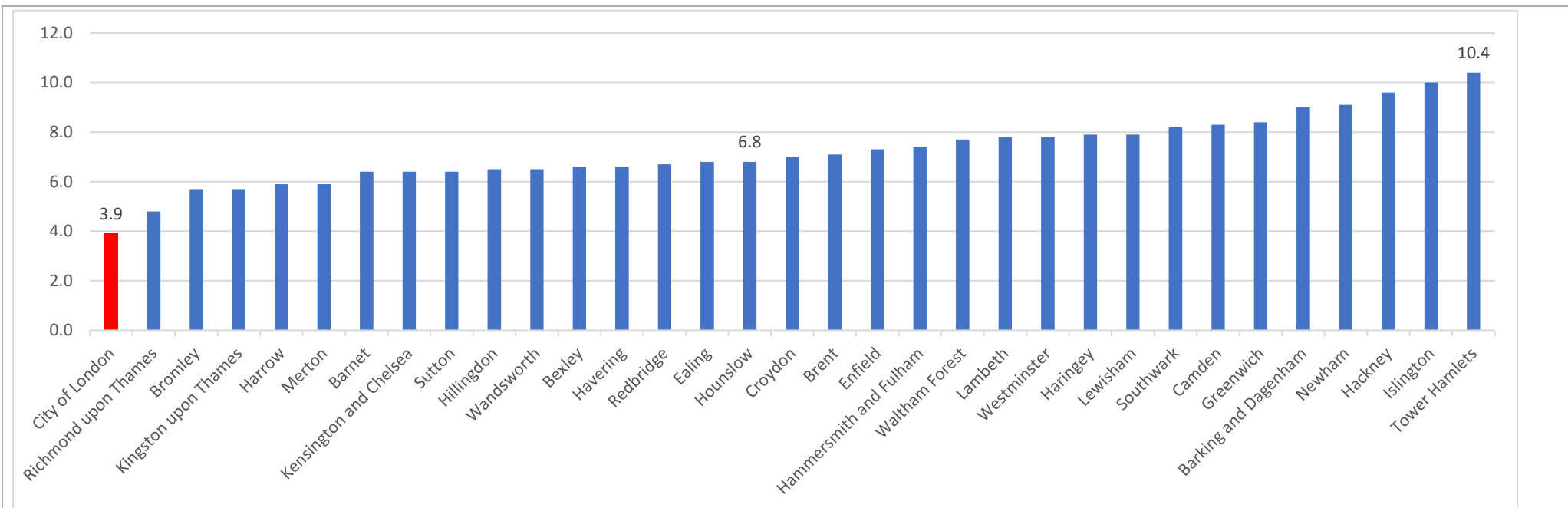


Figure 5: Percentage of People in the City of London with 'Bad health' (Source: ONS Census Data 2021)



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

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



Public Health England statistics support the above trend, as they report the percentage of people with a limiting long-term illness or disability in the City of London is 11.8% compared to 17.7% for England. This is considered significantly lower than the national average¹⁸.

As mentioned above, it should be noted that this data is not considered entirely representative of the people likely to be affected by the proposed scheme given the large percentage of visitors and commuters regularly travelling to the area, which is likely to be larger than that of the local population. Given that the area is likely to be visited by individuals living outside of the City, 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 autistic¹⁹. Further to this, there are over 2 million people in the UK living with sight loss²⁰. With these statistics in mind, it is therefore paramount that the construction of and design of the proposed works considers all users.

Sensitive receptors

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

- Fleet Street Clinic - 250 meters west of the proposed scheme.

¹⁸ https://www.localhealth.org.uk/#c=report&chapter=c05&report=r01&selgeo1=ialt_2021.E09000001&selgeo2=eng.E92000001

¹⁹ <https://www.london.gov.uk/questions/2022/1716#:~:text=Andrew%20Boff%20AM%3A%20With%20approximately,900%2C000%20Londoners%20with%20neurodivergent%20conditions>

²⁰ <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)

- Octopus Clinic – 90 meters west of the proposed scheme.

The following pharmacies are located near to the site:

- Lloyds Pharmacy within 600m of the site
- Boots Pharmacy within 800m of the site

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

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, 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 the Salisbury Square Development and the surrounding area than the data suggests. This is likely to be facilitated by the accessibility of the area by public transport, enabling those with limited mobility to access the site and surrounding area given bus and step-free tube/train station provision.

Further to this, the City of London holds disability data on 85% of the workforce, a group who are likely to be most affected by the proposals. 3.7% of the total workforce have declared themselves as having a disability. It should be noted however that employees are asked whether they “self-certify” as having a disability on the HR information system and similarly job applicants are asked to indicate if they consider themselves to have a disability. Therefore, it should be noted that this indicator does not necessarily accurately measure whether an employee meets the definition of “disability” under the Equality Act 2010¹³.

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 2030²¹. Further to this, walking is the main mode of travel for disabled Londoners, with 78% reporting they walk at least once a week.

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

It is recommended that the following is considered to mitigate any negative impact on people with disabilities:

- Setts: Setts being used in the carriageway and at raised tables will need to be monitored and maintained. Uneven, loose and/or gaps between setts, can cause issues for some users, including mobility aid users, and those using crutches and canes². This is particularly important if Whitefriars Street and Salisbury Court are used by large vehicles, including refuse/servicing vehicles, which are more likely to cause damage to the carriageway. Further to this, the repurposed setts, which require significant cleaning and cutting, will need to be assessed prior to use to ensure they are suitable and do not pose a trip or slip hazard.
- Kerb height: A 50mm kerb height could pose a potential trip hazard to some road users, particularly those who are visually impaired and/or have limited mobility. This risk should be evaluated pre-construction and the appropriate delineation considered to reduce hazard risk.
- Bollards: The proposed bollards adjacent to Fleet Street and those demarcating pedestrianised areas within the development (including Salisbury Square and the north and south passages) should be placed at a maximum of 1.2 metres apart to easy passage for mobility aid users, whilst

²¹ <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/disability/articles/outcomesfordisabledpeopleintheuk/2021>

However, 65% of disabled Londoners consider the condition of the pavements to be a barrier to walking more frequently²².

Research by Transport for All²³ 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 other mobility aids and can be trip-hazards. Tree roots, cobblestones, and poorly laid paving stones all contribute to this.

Similarly, these findings are echoed by DfT's Inclusive Mobility²⁴ 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. The following benefits have been identified with regards to the design and disabled users:

- Clear, high-quality footways are easy to navigate and provide a smooth surface free of trip hazards. This is particularly important for those who are visually impaired, and those who have limited mobility/use mobility aids.
- Uncontrolled crossing upgrades, including raised tables, provides a level surface for those with limited mobility and/or mobility aid users.
- Renewed tactile paving at the Whitefriars Street junction with Fleet Street and Salisbury Court junction with Fleet Street, and the two raised tables on Salisbury Court, benefits visually impaired users.

providing adequate protection for pedestrians. This recommendation also aligns with DfT guidance².

- Street furniture: The location of street furniture, particularly within Salisbury Square, should allow for easy passage for mobility aid users. Keeping street furniture to a minimum will provide a simple, legible space which can be beneficial for those who are neurodivergent.
- Disabled bays: To ensure the disabled bays are accessible to all, it is essential that dropped kerbs or raised tables are implemented alongside the disabled bays on Salisbury Court. To ensure that the disabled bays are made available during the construction phase, at Salisbury Court or at a location in close proximity.
- Greening: Consideration should be given to the tree species, selecting those with minimal leaf shedding to avoid a slippery footway. Street maintenance should already be covered within City Corporation's maintenance regime.
- Cycle Parking: It is recommended that the short stay cycle parking proposed across the site should be designed to provide stands that can accommodate cargo bikes, tandems, tricycles and side-by-side cycles, to encourage users of all abilities to visit the area by bike², and ensure the stands are well lit. CCTV can also be considered to improve security.
- Construction: A CEMP or CLP should be implemented to minimise construction impacts¹⁴. It should include measures such as suitable diversion routes with appropriate signage for any required footway closures as well as noise mitigation, which is particularly beneficial for some people with autism for example. Continued liaison with stakeholders should also be undertaken to inform the plans.

²² <https://www.cityoflondon.gov.uk/assets/Services-Environment/city-of-london-transport-strategy.pdf>

²³ <https://www.transportforall.org.uk/campaigns-and-research/pave-the-way/>

²⁴ [Inclusive Mobility. A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure \(publishing.service.gov.uk\)](https://www.inclusivemobility.org.uk/)

- Seating: Seating provision on Fleet Street and within Salisbury Square, provides a place for rest. This can be important for some disabled users who may have limited mobility and/or stamina.
- Shade, shelter and greening: Street trees and planting can play a key role in helping to remove harmful PM₁₀ particulates and NO₂ roadside emissions¹⁰ and mitigating against climate change impacts such as heating of streets (and provision of shaded areas), both of which disabled people are disproportionately affected by¹¹¹².
- Disabled bays: The provision of two disabled bays on Salisbury Court, allows for easy access to Salisbury Square for disabled users who may require doorstep access to the development and surrounding area.

A few potential negatives have been identified with regards to the scheme design.

As noted above, the design proposes multiple bollards adjacent to Fleet Street, some of which overlap with the tactile paving on the western side of the Salisbury Court junction with Fleet Street. This could cause a potential pinch point / obstacle for those with limited mobility/mobility aid users and could lead to confusion for visually impaired users.

There is also potential for street clutter/obstacles on Salisbury Square near to the removable bollards. The location of the bollards, coupled with seating, planters, relocated obelisk, cycle parking, and location of the raised table (uncontrolled crossing), could pose a pinch point for mobility aid users, if the appropriate widths are not maintained. Street clutter can also make a space confusing and overwhelming for those who are neurodivergent.

As noted in the section above, there are some instances where the footway widths go below the recommended two meters (including on the southern section of Whitefriars Street and on Primrose Hill) which can be an issue for mobility aid users, however it is noted that this is due to the existing building line therefore opportunities for widening the footway are limited.

Renewed granite kerbs are proposed across the site. A full height kerb will be maintained on Fleet Street, except at the junctions with Salisbury Court and Whitefriars Street, where continuous crossings are proposed. This ensures users with mobility issues can cross the road with ease. A 50mm upstand is proposed along the length of Salisbury Court, except at the uncontrolled crossing points. A

- 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.

50mm upstand could pose a trip hazard for some road users, particularly those who are visually impaired and/or have limited mobility.

Repurposed setts require significant cleaning and cutting therefore they may not be suitable for use, particularly if they are at risk of posing a trip or slip hazard.

Construction:

The following potential negative impacts on people with disabilities have been identified if the appropriate measures are not in place during the construction phase¹⁴:

- 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 some people with autism, whereby noises can be magnified and background noise can lead to difficulty concentrating²⁵
- Altered public realm and closures can be confusing to those with visual impairments who are familiar with the area
- Construction can also generate additional dust and pollutants which negatively impact people with respiratory or long-term illnesses

Summary:

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

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

Key borough statistics:

The 2021 Census identified that for the City of London's population:

²⁵ <https://www.autism.org.uk/advice-and-guidance/topics/sensory-differences/sensory-differences/all-audiences>

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%).

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.

- 0.7% of the population of The City self-reported as having Very Bad health – a 0.1% decrease from the 2011 census
- 56.6% of the population self-reported as having Very Good health – a rise from 55% in the 2011 census

- 3.9% had a disability that limited their day-to-day activities a lot
- 7.9% had a disability that limited their day-to-day activities a little

Source: 2021 Census: [Disability, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk/peoplepopulationandcommunity/disabilityandlongtermhealth/articles/disabilityenglandandwales-2021)

Pregnancy and Maternity

Check this box if NOT applicable

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

ONS Conception Statistics, England, and Wales, 2020 provides conception numbers for the City of London. Note these numbers have been combined with the London Borough of Hackney to preserve confidentiality. There were 5,659 conceptions in Hackney and the City of London in 2020. This equates to a conception rate per 1,000 women aged 15 to 44 years of 74.6%. This is slightly higher than the average for Inner London (66.1%) and lower than the average for London as a whole (76.2%).²⁶

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)²⁷.

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

²⁶ <https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/conceptionandfertilityrates/datasets/conceptionstatisticsenglandandwalesreferencetables>.

²⁷ [Births in England and Wales: summary tables – Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/articles/birthsinenglandandwales-summarytables-2021)

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 pushchairs could also benefit from the improvements to the public realm during maternity, as the proposed works would improve the overall pedestrian environment and accessibility.

It should be noted however, that the placement and positioning of bollards at the Salisbury Court junction with Fleet Street could impact accessibility, particularly for those travelling with pushchairs and young children. Similarly, poor maintenance of the setts used at the raised tables/uncontrolled crossings, may negatively impact pregnant woman who have limited mobility and/or those travelling with young children.

As noted, where the footway widths go below the recommended two meters (such as the southern section of Whitefriars Street and on Primrose Hill), this could be an issue for pregnant women and those travelling with young children, however it is noted that this is due to the existing building line therefore opportunities for widening the footway are limited.

The greening associated with the scheme could positively impact those who are pregnant/who have recently given birth. For example, research has shown that exposure to green space and general greening of cities is linked to decreased risk of pre-term birth²⁸.

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

- **Setts:** Setts being used in the carriageway and at raised tables will need to be monitored and maintained. Uneven, loose and/or gaps between setts, can cause issues for some users, including those who are pregnant or travelling with young children. This is particularly important if Whitefriars Street and Salisbury Court are used by large vehicles, including refuse/servicing vehicles, which are more likely to cause damage to the carriageway.
- **Bollards:** The proposed bollards adjacent to Fleet Street and those demarcating pedestrianised areas within the development (including Salisbury Square and the north and south passages) should be placed at a maximum of 1.2 metres apart to easy passage for pregnant women and those travelling with young children, whilst providing adequate protection for pedestrians. This recommendation also aligns with DfT guidance³⁰.
- **Street furniture:** The location of street furniture, particularly within Salisbury Square, should allow for easy passage for pregnant women and those travelling with young children.
- **Greening:** Consideration should be given to the tree species, selecting those with minimal leaf shedding to avoid a slippery footway. Street maintenance should already be covered within the City Corporation's maintenance regime.
- **Construction:** A CEMP or CLP should be implemented to minimise construction impacts¹⁴. It should include measures such as suitable

²⁸ [Greenness, civil environment, and pregnancy outcomes: perspectives with a systematic review and meta-analysis - PMC \(nih.gov\)](#)

³⁰ [Inclusive Mobility. A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure \(publishing.service.gov.uk\)](#)

<p>Construction:</p> <p>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 phase²⁹. These include:</p> <ul style="list-style-type: none"> • Pushchair users may find it difficult to utilise the temporary ramps • Construction can also generate additional dust and pollutants which negatively impact pregnant women and their babies. <p>Summary:</p> <p>The improved accessibility, public realm improvements and pedestrian environment will have a positive influence on Pregnant women and families with small children. However, pregnant women may be negatively affected during the construction phase and due to some of the design elements such as the bollards, however, the potential adverse impacts would be sufficiently managed through implementation of suitable design measures discussed in the adjacent actions section.</p>	<p>temporary ramps and dust and pollutant mitigation, measures which are particularly beneficial for pregnant women and those using pushchairs. Continued liaison with stakeholders should also be undertaken to inform the plans.</p> <ul style="list-style-type: none"> • 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.
<p>Key borough statistics:</p> <ul style="list-style-type: none"> • There were 5,659 conceptions in Hackney and The City in 2020. This equates to a conception rate per 1,000 women aged 15 to 44 years of 74.6%. This is slightly higher than the average for Inner London (66.1%) and lower than the average for London as a whole (76.2%). 	<ul style="list-style-type: none"> • There were 60 live births in The City of London in 2021. The Total Fertility Rate (TFR) in the City was 1.74. This is higher than the average for Inner London (1.28) and also for London as a whole (1.52).

²⁹ [Inclusive Mobility. A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure \(publishing.service.gov.uk\)](#)

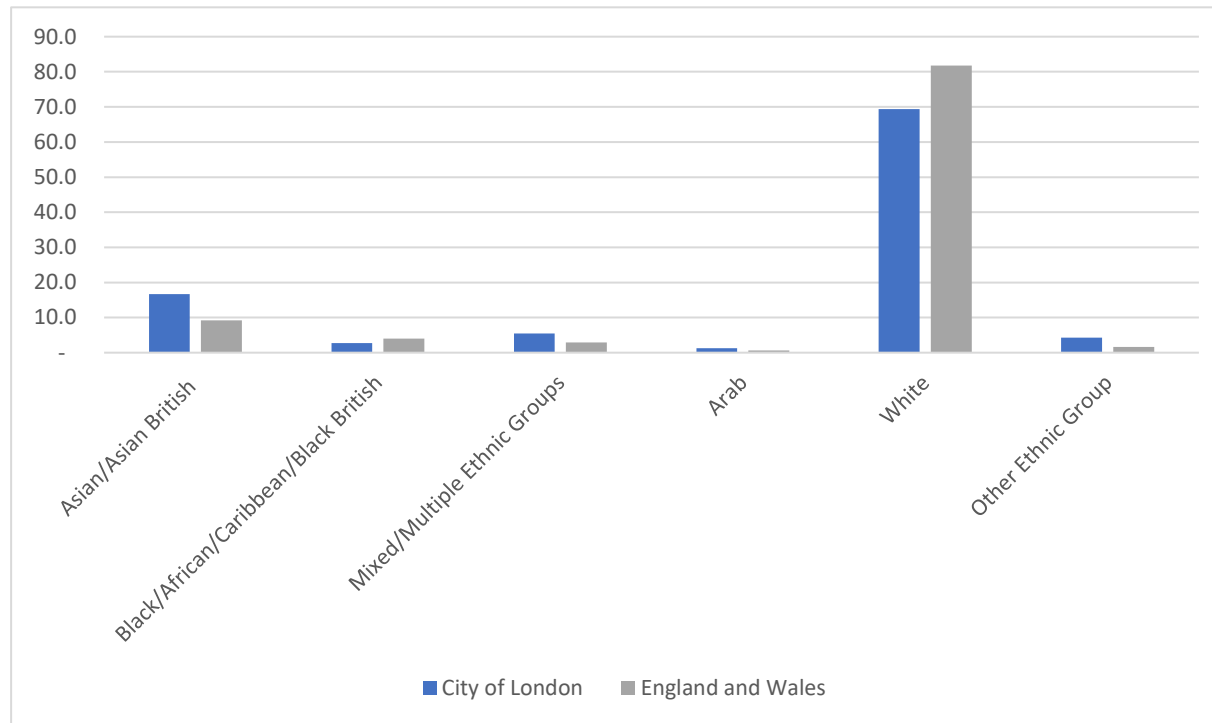
Race

Check this box if NOT applicable

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

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

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



The White and Black populations are lower than the national averages for England, with differences of 12.4% and 1.3% respectively. The other ethnic group categories are higher than the national averages, with the greatest difference occurring for the Asian population which is 7.5% higher³¹.

³¹ https://www.nomisweb.co.uk/sources/census_2011_ks/report?compare=E09000001

As noted above, 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, commuters, and visitors. Demographics of those visiting the City of London or using the City as a commuting route are unknown, however the City Corporation holds ethnicity data on 88% of its workforce. This data shows that the City Corporation workforce is overwhelmingly white, making up 70%, compared to 7.5% Black or Black British and 5.5% Asian or Asian British¹³.

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 and may feel vulnerable if the security measures associated with the proposed works are insufficient.

Summary:

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

Key borough statistics:

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

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.

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

- **Lighting and CCTV:** Sufficient levels of lighting should be included within Salisbury Square, and the north and south passages, to further improve safety of users and to account for any blind spots. This is particularly important given that some groups are more at risk of hate crimes than others, therefore such measures could help to deter anti-social behaviour such as hate crimes. CCTV can also be considered to improve safety.
- **Greening:** Trees and planters should be well maintained as to not block the view of the street or facilitate hiding spaces and blind spots for people to lurk. Consideration should be taken to ensure that the location of the trees is a suitable distance from lighting columns so as not to cause shadows and dark spots on the street.

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 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%.

Religion or Belief

Check this box if NOT applicable

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

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

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

The majority of the population identify as non-religious. The second highest proportion of the population identify as having no religion, and the third highest proportion of the population have not stated a religion. This differs with the averages for England and Wales (Christian: 46.2%, No religion: 37.2% and Religion not stated: 6%). As determined by the Annual Population Survey, the employment rate by religion estimates for 2018 show the percentage of the population in England identifying as having no religion to have the highest employment rate at 77.3%, followed by those who identify as Hindu at 76.2% and then those identifying as Christian at 76%.³²

As noted above, 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, commuters, and visitors. Demographics of those visiting the City of London or using the City as a commuting route are unknown, however the City Corporation holds religion and belief data on 83% of its workforce. This data shows that the highest proportion of the workforce is Christian (36%) and with a further 36% stating that they have None/No religion or belief¹³.

Sensitive receptors

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

- Temple Church – 170 meters to the west of the site.
- St Bride’s Church – 130 meters to the east of the site.
- St Dunstan-in-the-West Church – 200 meters to the northeast of the site.
- St Andrews Church – 400 meters to the north of the site.

³² <https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/religion/datasets/religioneducationandworkinenglandandwales>

- St Andrew by the Wardrobe – 400 meters to the east of the site.
- The Church of St Martin Ludgate – 350 meters to the east of the site.

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

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

Construction:

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

Summary:

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

Key borough statistics – sources include:

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

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

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

- Lighting and CCTV: Sufficient levels of lighting should be included within Salisbury Square, and the north and south passages, to further improve safety of users and to account for any blind spots. This is particularly important given that some groups are more at risk of hate crimes than others, therefore such measures could help to deter anti-social behaviour such as hate crimes. CCTV can also be considered to improve safety.
- Greening: Trees and planters should be well maintained as to not block the view of the street or facilitate hiding spaces and blind spots for people to lurk. Consideration should be taken to ensure that the location of the trees is a suitable distance from lighting columns so as not to cause shadows and dark spots on the street.

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

Sex

Check this box if NOT applicable

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

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

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

The pedestrianisation of Salisbury Square and the associated improved public realm could activate the space by encouraging people to use the space for more hours of the day. This in turn can improve levels of natural surveillance and can positively impact feelings of personal safety. Maintenance of trees and planters is recommended to ensure the Square is visible from Salisbury Court.

Whilst the new passages (north and south) provide a cut through between Whitefriars Street and Salisbury Court, a lack of lighting and passive surveillance, could make these spaces feel unsafe during hours of darkness. Multi-layered lighting along with passive surveillance should be considered to increase the attractiveness of these spaces. 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 men³³.

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?

It is recommended that the following is considered to mitigate against any negative impact on women:

- **Lighting and CCTV:** Sufficient levels of lighting should be included in the design, particularly within Salisbury Square and the new passages, to further improve safety of users and to account for any blind spots. This is particularly important given that some groups are more at risk of hate crimes than others, therefore such measures could help to deter anti-social behaviour such as hate crimes. CCTV can also be considered to improve safety.
- **Greening:** Trees and planters should be well maintained as to not block the view of the street or facilitate hiding spaces and blind spots for people to lurk. Consideration should be taken to ensure that the location of the trees is a suitable distance from lighting columns so as not to cause shadows and dark spots on the street.

³³ <https://www.endviolenceagainstwomen.org.uk/new-data-women-feel-unsafe-at-night/>

Key borough statistics:

At the time of the 2021 Census ([Sex - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk)) population of the City of London could be broken into could be broken up into:

- 4722 males (55.5%)
- 3,816 females (44.5%)

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

- [Population projections](#)

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

Sexual Orientation and Gender Reassignment

Check this box if NOT applicable

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

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

London:

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

City of London:

- Heterosexual: 79.3%
- Gay or Lesbian: 7.6%
- Bisexual: 2.3%
- Pansexual: 0.3%
- Asexual: 0.1%
- Queer: 0.1%
- All other sexual orientations: 0%
- Not answered: 10.4%

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

Sensitive receptors

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

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

There is the potential that insufficient lighting could disproportionately affect people based on their sexual orientation and gender reassignment, in terms of their personal safety.

Summary:

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

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

- Lighting and CCTV: Sufficient levels of lighting should be included within Salisbury Square, and the north and south passages, to further improve safety of users and to account for any blind spots. This is particularly important given that some groups are more at risk of hate crimes than others, therefore such measures could help to deter anti-social behaviour such as hate crimes. CCTV can also be considered to improve safety.
- Greening: Trees and planters should be well maintained as to not block the view of the street or facilitate hiding spaces and blind spots for people to lurk. Consideration should be taken to ensure that the location of the trees is a suitable distance from lighting columns so as not to cause shadows and dark spots on the street.

Key borough statistics:

- [Sexual orientation, England and Wales - Office for National Statistics \(ons.gov.uk\)](#)
- [Measuring Sexual Identity - ONS](#)

Marriage and Civil Partnership

Check this box if NOT applicable

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

The marriage and civil partnership profile for the City of London borough as reported in the 2021 Census is as follows:

- Single: 48.33%;
- Married: 35.1%;
- Divorced or formerly in a same-sex civil partnership which is now legally dissolved: 7.8%;

- Widowed or surviving partner from a same-sex civil partnership: 4.69%;
- Separated: 2.38%; and
- In a registered same-sex civil partnership: 1.7%.

The percentage of the population who fall within the Single and Married categories differ from the averages for England, where 37.9% are single and 46.9% are married. This shows the City of London to have a significantly higher number of single people, which aligns with the lower number of people who are married. The other four categories follow the national averages closer, with the differences between the City of London and England being much smaller as follows:

- Divorced or formerly in a same-sex civil partnership which is now legally dissolved: 0.4% lower;
- Widowed or surviving partner from a same-sex civil partnership: 1.4% lower;
- Separated: 0.1% lower; and
- In a registered same-sex civil partnership: 1.5% higher.

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)

The City Corporation are uniquely placed to partner with stakeholders that span multiple sectors. As such, we can radically improve social mobility primarily across the cultural institutions we support.

Social Mobility Strategy, 2018-28 for the City of London Corporation - <https://www.cityoflondon.gov.uk/assets/Business/social-mobility-strategy-2018-28.pdf>

This project is a unique opportunity to create modern facilities for both the City of London Police Headquarters and the Courts, in the heart of Fleet Street. This will support the worker population in the Square Mile in the Professional Services sector but those in lower paid sectors too. Furthermore, the Salisbury Square Development will not only deliver a new purpose-built legal facility and City of London Police Headquarters, it will revitalise and enhance the public spaces for those living, working and visiting the Fleet area

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

Central to the Salisbury Square Development is the enhancement and enlargement of the existing Salisbury Square. The revitalised Square will see an enhanced pedestrian route and space, as well as build-on existing greening and introduce seating. The Salisbury Square Development will also deliver improvements to the pedestrian environment on Fleet Street, Salisbury Court, Whitefriars Street, and Primrose Hill which will bring benefits to people visiting, living or working that area.

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.

None have been identified at this time

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 Salisbury Square Development highway and public realm works will provide benefits for protected characteristics. Benefits include: improved accessibility, and comfort levels throughout the project site, the pedestrianisation of Salisbury Square, access to enhanced greening, and the availability of seating. 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 in the overall design of the scheme. Importantly, impact mitigation needs to be considered and undertaken during the construction phase. As mentioned above, the designs have been assessed using the City of London Street Accessibility Tool (CoLSAT) and Healthy Streets (HS) Assessment, both of which have been developed in consultation with key accessibility groups. In line with the City of London’s existing

practices, it is advised that further designs taken into consideration future CoLSAT and HS Assessments. It is also recommended that each design iteration is assessed by the City's in-house accessibility expert to ensure all considerations are taken into account.

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 – City Operations Director	Date: 05/11/2024
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