

ED-HIS2



Quod

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# Equality Impact Assessment

Local Plan Review

City Plan 2040

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DECEMBER 2023

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# 1 Introduction

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- 1.1 This Equality Impact Assessment (EqIA) considers the potential equality effects of the policies of the City Plan 2040. The main objective of the EqIA is to provide the City Corporation with information about the impact on the protected characteristics identified in the 2010 Equality Act, to support its decision-making process in adopting the Local Plan. This Report has been prepared by Quod.

## The City Plan 2040

- 1.2 The new City Plan 2040, sets out the Corporation's vision, strategic objectives and planning framework to guide future development and decision making in the City of London area ("the City") for the upcoming years to the year 2040. The City Plan 2040 replaces the Local Plan 2015 adopted in January 2015.
- 1.3 The Local Plan has been built on the principles of sustainable development in line with the National Planning Policy Framework (NPPF) objective for the planning system to deliver economic, social and environmental change.
- 1.4 The **economic objectives** build on the City's existing role as a national and global economic centre and support the continued economic and employment growth. The City Plan 2040 sets out to:
- Deliver sustainable economic growth, including a minimum of 1.2 million sqm net additional office floorspace by 2040;
  - Ensure new and refurbished office space meets the environmental, social and governance (ESG) priorities of occupiers and their workforces;
  - Provide flexible and adaptable workspace that meets the needs of different sectors and business sizes, supporting specialist business clusters and promoting a range of complementary uses including education;
  - Create a more vibrant and diverse retail economy;
  - Enhance the City's evening and weekend economies;
  - Create new and enhanced culture, leisure and visitor attractions;
  - Deliver the accommodation, facilities, attractions and infrastructure required for a leading destination;
  - Ensure development plays a significant role in enhancing the life of the Square Mile and the capital as a whole, both through the uses and design of development and through appropriate planning contributions; and
  - Help to facilitate the infrastructure requirements of the Square Mile.
- 1.5 The **social objectives** aim to reimagine the City as a 24 hour 7 day a week destination and diversify the uses in the City through:

- Delivering new, inclusive open spaces and enhancing the City's public realm for everyone;
- Enhancing the City's riverside for everyone through the delivery of new and improved public realm and greater vibrancy;
- Enhancing and transforming seven Key Areas of Change where significant change is expected and providing a policy framework to guide sustainable change in those areas;
- Engaging with the City's communities including workers and residents and other stakeholders;
- Creating a more inclusive, healthier, and safer City for everyone;
- Delivering additional homes within the Square Mile and on City Corporation estates and other appropriate sites outside the City; and
- Enhancing the City's social infrastructure and creating new sports and recreation opportunities across the Square Mile.

1.6 The **environmental objectives** aim to ensure that residents, workers and visitors in the City enjoy a good living environment by:

- Ensuring that the City is environmentally sustainable and transitions to a net zero carbon City by 2040, taking a 'retrofit first' approach to development;
- Delivering urban greening and greater biodiversity;
- Celebrating, protecting and enhancing the City's unique heritage assets;
- Enhancing the City's distinctive and iconic skyline while preserving strategic views of St Paul's Cathedral and the Tower of London World Heritage Site;
- Ensuring exemplary design of development;
- Promoting greater use of the river Thames for passenger and freight transport, increased enjoyment of the City's riverside and reductions in the risk of flooding; and
- Ensuring development and infrastructure help transform the City's streets, creating attractive and accessible places to walk, wheel, cycle and spend time, and enabling sustainable transport and active travel.

### Assessment Summary

1.7 This Equality Impact Assessment provides the City Corporation with information about potential impacts on the protected characteristics identified in the 2010 Act, to inform the decision making in adopting the new City Plan.

1.8 The EqIA has not found any potential negative impacts arising from the policies of the City Plan 2040 on people with protected characteristics under the 2010 Equality Act.

1.9 The assessment considers that the policies of the City Plan will have a positive impact on people in general, with differential and disproportionate beneficial impacts identified on people with some particular protected characteristics.

## 2 Methodology

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### Legislative Context

- 2.1 In considering the Local Plan, the City Corporation is required to consider potential equality effects under the 2010 Equality Act ("the 2010 Act") as part of the Public Sector Equality Duty (PSED) stated in the 2010 Act.
- 2.2 Guidance<sup>1</sup> for local authorities published by the Government Equalities Office clarifies that the 2010 Act does not impose a legal requirement to conduct an Equality Impact Assessment, but it emphasises the importance of consciously considering the aims of the PSED in decision making.
- 2.3 The 2010 Act forms the basis of anti-discrimination law in Great Britain. The 2010 Act (Section 4) defines the protected characteristics which are covered by the Act:
  - Age
  - Disability
  - Gender reassignment
  - Marriage and civil partnership
  - Pregnancy and maternity
  - Race
  - Religion or belief
  - Sex
  - Sexual orientation
- 2.4 The requirement for public authorities to have due regard to equality considerations when exercising their functions is stated in Section 149 of the 2010 Act. This Public Sector Equality Duty (PSED) requires public authorities to have due regard for the need to:
  - Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
  - Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
  - Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 2.5 As set out in Section 149 (3) of the 2010 Act, the need to advance equality of opportunity includes the need to:

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<sup>1</sup> Government Equalities Office, 2011. Equality Act 2010: Public Sector Equality Duty What do I need to know? A quick start guide for public sector organisations.

- Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
- Take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it; and
- Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

## Approach

- 2.6 The City Plan policies will have an impact on residents, workers and visitors in the City of London. Each of these will have some protected characteristics as defined by the 2010 Act, and there will be varying degrees of intersectionality (such as age, race and sex).
- 2.7 The purpose of this EqIA is to identify where there may be a differential equality effect, where people with a protected characteristic are impacted differentially to the general population as a result of vulnerabilities or restrictions they face because of that protected characteristic.
- 2.8 Therefore, policies were assessed against their potential to differentially affect people with particular protected characteristics as a result of those protected characteristics. In some instances, a disproportionate effect could be likely where people with a particular protected characteristic make up a greater proportion of those affected than in the wider population.
- 2.9 The scale and significance of such impacts cannot always be quantified. Therefore, the consideration of equality effects includes a descriptive analysis of the potential impacts and identifying their nature – whether such impacts are adverse or beneficial.
- 2.10 In many cases, the actual equality effect will in practice depend on the detail of implementation of policies, and therefore where possible this EqIA focuses on the effects attributable to the adoption of those policies themselves. Individual decisions taken under these policies, including decisions on whether to grant planning permissions, will themselves also need to meet the PSED, within the framework set by the City Plan.

## 3 Local Context

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- 3.1 This section of the EqIA provides relevant baseline information in relation to protected characteristics, to understand if the demographics of the local population have any particular protected characteristics that may be affected by the Local Plan.

### Methodology

- 3.2 The EqIA's baseline analysis has been informed by a range of datasets and sources, comprising:
- Census 2021<sup>2</sup>;
  - Census 2011<sup>3</sup>;
  - Annual Population Survey 2021<sup>4</sup>; and
  - Live Births 2021<sup>5</sup>.
- 3.3 The City as a whole has a small residential population as it is a largely commercial area of London. Therefore, the workplace population is significantly higher and this has been captured in this baseline analysis. Data on the protected characteristics of City's workplace is not available for all protected characteristics, thus the data included in this assessment has been limited by availability.
- 3.4 Because of the close employment and community relations between the City and its neighbouring boroughs (as shown in **Figure 3.1**), a baseline analysis of the neighbouring boroughs has also been included for the purpose of this assessment.
- 3.5 The data at the basis of this context analysis is presented in **Annex 1**.

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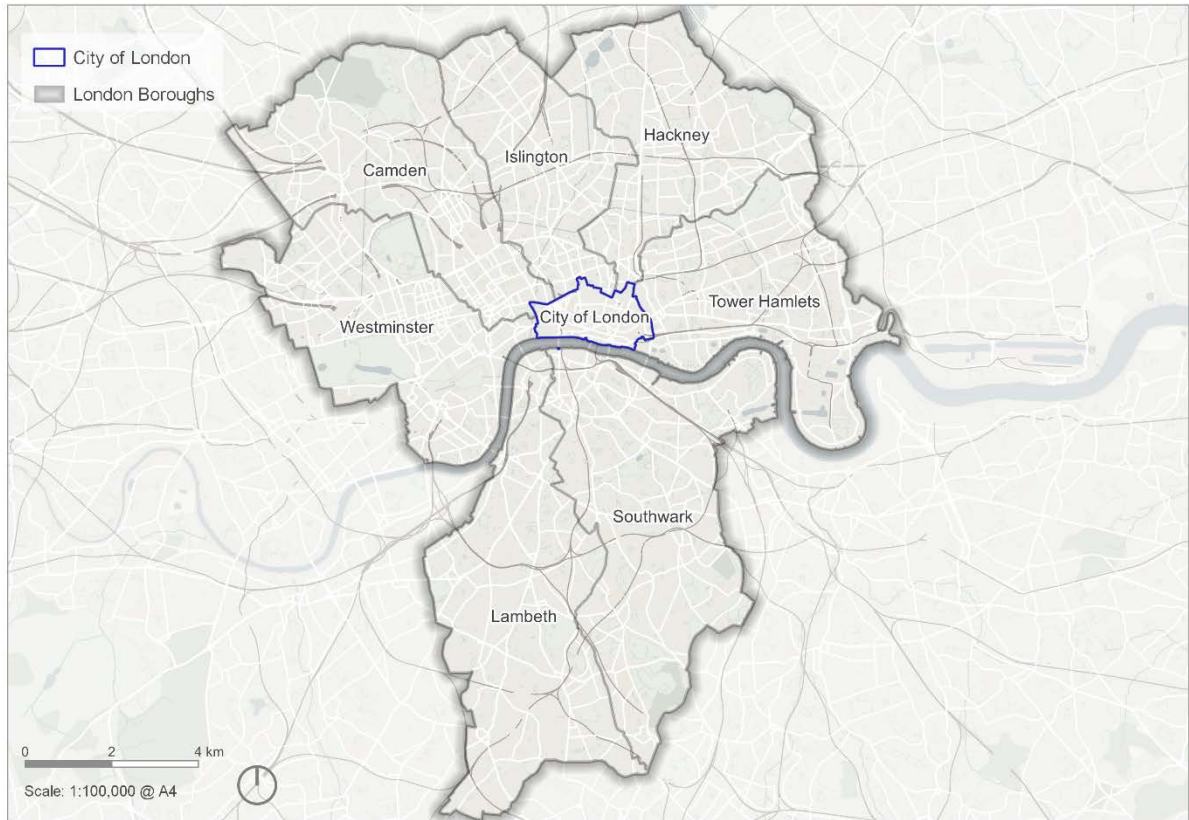
<sup>2</sup> Office for National Statistics, 2021. Census.

<sup>3</sup> Office for National Statistics, 2011. Census.

<sup>4</sup> Office for National Statistics, 2021. Annual Population Survey.

<sup>5</sup> Office for National Statistics, 2021. Live Births.

Figure 3.1 – Study Areas



[Map showing the London boroughs of Westminster, Camden, Islington, Hackney, Tower Hamlets, Southwark, Lambeth and the City of London.]

### Population Context

- 3.6 The City has a total residential population of 8,600 people. Between 2011 and 2021, the population has grown by 16% - twice the growth rate seen in London and the majority of the neighbouring boroughs. Camden saw a similar growth rate in the same period. Tower Hamlets had a slightly higher growth rate of 22%. Approximately 1 in 5 Londoners live across the seven boroughs and the City.
- 3.7 Given the nature of the City as an employment and commercial area, the workday population is considerably larger than the resident population. The working population of the City is approximately 615,000 people<sup>67</sup>.

<sup>6</sup> Office for National Statistics, 2022. Business Register and Employment Survey.

<sup>7</sup> Workplace estimates vary with the Annual Population Survey (2022) suggesting it could be as high as 770,000.



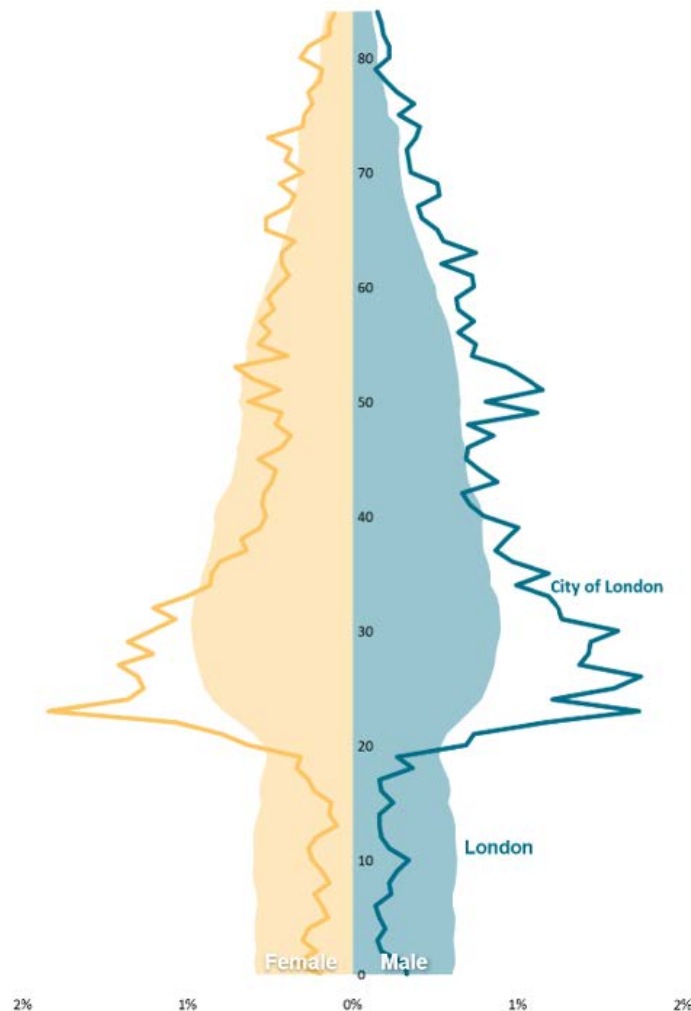
## Protected Characteristics

- 3.8 The following section provides baseline data on the demographics of the local population with respect to the protected characteristics as defined by the 2010 Act where available data exists.

### Age

- 3.9 Across the City and the eight neighbouring boroughs, the proportion of working age residents is higher than the average for London. The City has a significantly lower proportion of residents under the age of 20 and a higher proportion of working age residents, particularly aged between 20 and 30, compared to London, as shown in **Figure 3.2**.

Figure 3.2 – Comparison between the Population Structure in City of London and London (2021 Census)



[Population pyramid showing the population structure in the City of London compared to London overall.]

- 3.10 The City's workforce is younger than the London average, with 4 in 5 workers aged under 50 years old. Across the surrounding boroughs, Camden and Hackney have a slightly older workforce than the London average.
- 3.11 The data does not indicate that there is a particularly sensitive age profile in the City among the residents. However, individuals within different age groups can be more sensitive to changes. For example, certain policies such as those that promote improvements to public realm and building accessibility can impact the elderly, so may differentially affect this age group.

### Sex

- 3.12 The sex split of residents and workers in the City is weighted more towards the male sex compared to the average for London. As shown in **Figure 3.2**, the proportion of both female and male residents declines after the age of 35, although the decline is sharper for female residents. There are more men over the age of 35 than women living in the City.
- 3.13 Across the eight surrounding boroughs, the sex split is more similar to the London average. This is true for both residents and workers. Camden is the only borough where the proportion of female workers is higher than the proportion of male workers.

### Gender Reassignment

- 3.14 A person has the protected characteristic of gender reassignment if the person is proposing to undergo, is undergoing, or has undergone a process (or part of a process) for the purpose of reassigning the person's sex by changing physiological or other attributes of sex (2010 Act, Section 7).
- 3.15 To be protected from gender reassignment discrimination, one does not need to have undergone any specific treatment or surgery to change from one's birth sex to one's preferred gender. This is because changing your physiological or other gender attributes is a personal process rather than a medical one. You can be at any stage in the transition process – from proposing to reassign your gender, to undergoing a process to reassigning your gender, or having completed it (as per the Equality and Human Rights Commission).
- 3.16 According to the 2021 Census, the proportion of residents aged 16 years or over across the eight boroughs who indicated that they have a gender identity different from their sex registered at birth is broadly in line with the London average. The proportion is slightly lower in the City.

### Sexual Orientation

- 3.17 A person's sexual orientation includes their sexual behaviour, sexual attraction and sexual identity. Sexual orientation is a protected characteristic to allow individuals to choose how to express their sexual orientation without discrimination. This includes discrimination in the provision of goods, facilities and services on grounds of sexual orientation.

- 3.18 Discrimination towards sexual orientation is possible in various forms including: discrimination arising from one's self-perceived sexual identity; one's perceived sexual orientation (discrimination by perception); or one's links to other individuals and their sexual orientation (discrimination by association).
- 3.19 The City and surrounding boroughs have a higher proportion of the population aged 16 years or over that identified as gay, lesbian or bisexual than across London (2021 Census).

### Marriage and Civil Partnership

- 3.20 According to the 2021 Census, across the City and the eight surrounding boroughs, the proportion of residents who were never married or in a registered partnership is higher than across London. Conversely, the proportion of residents who are married is lower. The proportions of residents who are separated, divorced, formerly in a civil partnership, or widowed are broadly in line with the London average for all nine spatial areas.

### Pregnancy and Maternity

- 3.21 The ONS does not provide statistics on the number of people who are pregnant. Therefore, this baseline analysis considered live birth data as a proxy. The general fertility rate (GFR), measured as number of live births in a year per 1,000 women aged 15 to 44 years, is lowest in the City when compared to all spatial levels. Hackney is the only borough where the GFR is broadly in line with London, whereas all other boroughs experience a lower GFR than the London average.

### Race

- 3.22 A person's race can include a number of personal characteristics. As defined in the 2010 Act race includes colour, nationality and ethnic or national origins. Therefore, this baseline assessment has considered a range of data sources including ethnicity, place of birth and language spoken to provide a baseline analysis of the study area with respect to race.

### Ethnicity

- 3.23 London is a diverse city – 54% of residents identify as White, 21% as Asian/Asian British, 14% as Black/African/Caribbean/Black British and 12% identify as Mixed/Multiple Ethnic Groups or Other Ethnic Group (2021 Census).
- 3.24 The ethnic diversity is mirrored across the City and the surrounding boroughs. However, Tower Hamlets has a significantly higher proportion of Asian/Asian British residents and Lambeth and Southwark have higher proportions of Black/African/Caribbean/Black British residents.

3.25 While a detailed breakdown is not available, it is estimated that 37% of the City's workforce is of Black, Asian or a minority ethnic origin<sup>8</sup>.

#### *Place of Birth*

3.26 The 2021 Census [provides data on place of birth. In London, 59% of residents were born in the UK; 16% were born in the rest of Europe; 13% were born in the Middle East and Asia; 7% were born in Africa; 4% were born in the Americas and Caribbean, and 1% were born in Australasia.

3.27 Half of the residents in the City were born in the UK. In contrast with London as a whole, a higher proportion of residents were born in Europe. In Tower Hamlets, a higher proportion of residents were born in Asia or the Middle East than across all spatial levels.

3.28 The City has an international workforce, with 42% of workers born outside the UK – 14% from the European Economic Area and 27% from the rest of the world<sup>9</sup>.

#### *Language*

3.29 Language has been defined in the 2021 Census as an individual's 'main language', which is considered "a person's first or preferred language". The proportion of residents who indicated that English is their preferred language is broadly similar across all spatial areas.

#### *Religion or Belief*

3.30 A smaller proportion of City residents proactively identify themselves as belonging to a religion than across all spatial levels (2021 Census). Across the eight boroughs, Tower Hamlets and Westminster had the higher proportions of residents that proactively identify themselves as belonging to a religion, at a similar rate with London.

3.31 The City is home to a number of places of worship, including 45 Christian churches and chapels and one Synagogue.

#### *Disability*

3.32 The 2021 Census asked residents to self-assess their health. The proportion of residents in the City who have self-assessed their general state of health as "very good" and "good" is higher than across all spatial levels. Across all spatial levels, the highest proportion of residents who self-assessed their health as "bad" and "very bad" is in Islington. The proportion of residents who indicated they are disabled under the Equality Act (2010) is broadly in line across all spatial levels.

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8 City of London (2023) City of London Factsheets – February 2023. Available at: <https://www.cityoflondon.gov.uk/assets/Business/city-stats-factsheet-2023.pdf> [Accessed 23/11/2023]

9 City of London (2023) The role of financial and professional services in the UK – November 2023. Available at: <https://www.cityoflondon.gov.uk/assets/Business/city-stats-factsheet-2023.pdf>.

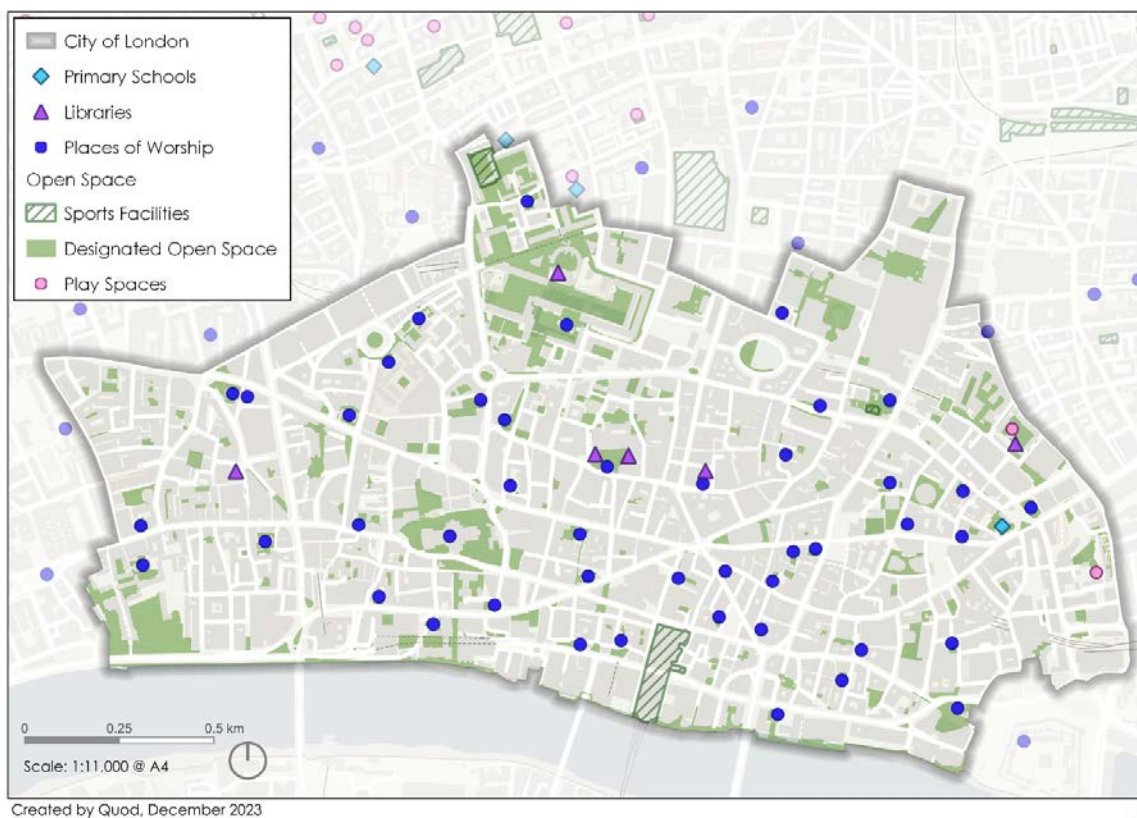
## Visitors to the City of London

- 3.33 The City of London is not just a home and a place for work. Millions of visitors come to the City yearly for business, leisure and other activities from across London, the UK and the whole world. While it is not possible to statistically represent the characteristics of these people, it is acknowledged that they will have a range of protected characteristics.
- 3.34 The City Plan 2040 includes strategic design policies for the City to continue to attract and even increase high visitor numbers, therefore it is important to acknowledge that some will also be impacted by the equality effects of the Local Plan.

## Community Infrastructure

- 3.35 The City is home to historic places of worship and open spaces which support the community uses such as schools, libraries and play spaces. An overview of the community infrastructure is presented in **Figure 3.3**, with a focus on those with particular relevance to protected characteristics. This is not intended to be comprehensive – there is a wide range of definitions of infrastructure, and some, such as places of worship, may be informal and unregistered. It is indicative of the range of places that may be affected by the City Plan.

Figure 3.3 – Community Facilities<sup>10</sup> within the City of London



<sup>10</sup> This figure includes sports facilities which are owned by or in partnership with local authorities or are charities or social enterprises. The City has numerous privately owned sports facilities.

[Map showing the community facilities (schools, libraries, places of worship, open spaces, playspaces and sports facilities) in the City of London.]

## Summary

- 3.36 The City's resident population is generally comprised of younger working age residents and with proportionately fewer children living here. There are disproportionately more men living in the City compared to women (this is also true of the workday population).
- 3.37 The City's resident population includes a high proportion of residents not born in the UK, including a high proportion of residents born in Europe and the Americas and Caribbean. The City also has an international workforce.
- 3.38 The purpose of the baseline is to provide an overview of the demographic characteristics of the population living and working in the City and the eight surrounding boroughs, where data is available. The potential impacts of the Local Plan will be considered on each protected characteristic, independent of it being disproportionately represented across the nine spatial areas.
- 3.39 Following the baseline analysis, **Table 3.1** sets out the protected characteristics that are considered could potentially be disproportionately affected by the City Plan because of their prevalence in the local population, workers or visitors. The potential disproportionate effects will be considered in the assessment section where relevant.

Table 3.1 – Groups identified in baseline for consideration for potential disproportionate effects

Protected Characteristic	Potential for a Disproportionate Effects	Comments
Age	Yes	High proportion of young adults in both the resident and working population
Sex	Yes	High proportion of men in both the resident and working population
Gender Reassignment	No	No disproportionate representation identified
Sexual Orientation	Yes	High proportion of local population identified as gay, lesbian or bisexual
Marriage & civil partnership	No	No disproportionate representation identified
Pregnancy and maternity	No	No disproportionate representation identified
Race	Yes	The City and surrounding boroughs have an ethnically diverse population

Religion or belief	Yes	There are numerous places of worship across the City
Disability	No	No disproportionate representation identified

## 4 Assessment

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- 4.1 The main objective of an Equality Impact Assessment is to provide the City Corporation with information, particularly with regard to their impact on the protected characteristics identified in the 2010 Act, to inform their decision making. The tables set out in this section cover each chapter of the City Plan, with a row for each proposed policy, a column for each protected characteristic, and notes explaining the assessment. Positive or negative effects are considered, and a single +/- signifies a general effect, while a double symbol ++/-- signifies an effect that may have a particular differential effect with respect to a specific protected characteristic.
- 4.2 The assessment didn't identify any likely significant negative equality effects from the City Plan policies. The assessment divided them into areas where there are general positive effects irrespective of protected characteristics (shown as "+") and those with specific beneficial effects related to a particular protected characteristic (shown as "++").

### Health, Inclusion and Safety

#### Strategic Policy S1: Healthy and Inclusive City

- 4.3 Strategic Policy S1 supports an inclusive living and working environment, setting out requirements for development to achieve this. The policy is likely to have a positive impact for all, including those with particular protected characteristics, through promoting an inclusive environment and by requiring inclusivity principles to be embedded in the design of buildings and spaces.
- 4.4 The policy considers the provision of training and skills development to facilitate employment, particularly for those in the City and neighbouring boroughs. This will have a beneficial impact for everyone, including those with particular protected characteristics, by increasing opportunities for employment.
- 4.5 The policy supports and encourages the provision of nursery and childcare facilities, which will particularly have a positive impact on those with "Pregnancy and maternity" as a protected characteristic.
- 4.6 The detailed policies under Strategic Policy S1 are assessed below in **Table 4.1**.



Table 4.1 – Strategic Policy S1: Healthy and Inclusive City Policies Assessment

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
Policy HL1: Inclusive building and spaces	+	+	+	+	+	+	+	+	<p>Policy HL1 requires buildings and spaces to be designed with inclusive principles and promote equity, diversity and social inclusion. This is likely to have a positive impact on everyone and particularly beneficial to people with particular protected characteristics by requiring inclusive principles to be embedded from design stage.</p> <p>The policy requires Equality Impact Assessments to be submitted with major planning applications to demonstrate how this is achieved. This is likely to have a positive impact on equality matters.</p>
Policy HL2: Air Quality	+	+	+	+	+	+	+	+	<p>Policy HL2 sets air quality standards for future developments. This policy will have a beneficial impact for all, including those with particular protected characteristics. Some groups may be particularly sensitive to air quality, therefore this policy is likely to</p>

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
									have a positive impact on "Age", "Disability" and "Pregnancy and maternity" protected characteristics.
Policy HL3: Noise	+	+	+	+	+	+	+	+	Policy HL3 sets out noise standards for future developments and the requirement for noise mitigation measures to be implemented during construction. This policy will have a beneficial impact for all, including those with particular protected characteristics. Some groups may be particularly sensitive to noise, therefore this policy is likely to have a positive impact on "Age", "Disability" and "Pregnancy and maternity" protected characteristics.
Policy HL4: Contaminated land and water quality	+	+	+	+	+	+	+	+	Policy HL4 requires site investigations to be carried out to establish land contamination during ground works and creation of open spaces. This policy will have a beneficial impact for all, including those with particular protected characteristics.

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
Policy HL5: Location and protection of social and community facilities	+	+	+	+	+	+	+	+	Policy HL5 supports the provision of social and community facilities and protects existing infrastructure. Some community uses (for example, places of worship) are used by certain groups with particular protected characteristics. While it is considered that this policy will have a beneficial impact for all, the impact will be disproportionately beneficial to those with particular protected characteristics who might use community facilities that are particular to their protected characteristic.
Policy HL6: Public toilets	+	+	+	+	+	+	+	+	Policy HL6 supports the provision of publicly accessible toilets and free 'Changing Places'. This policy will be beneficial for everyone, and particularly beneficial to those with 'Age', 'Disability', 'Pregnancy and Maternity' and 'Sex' as a protected characteristic.
Policy HL7: Sport and recreation	+	+	+	+	+	+	+	+	Policy HL7 supports the provision of sports facilities and recreation facilities that are accessible to all. This policy

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
									will have a beneficial impact for all, including those with particular protected characteristics.
Policy HL8: Play areas and facilities	+	+	+	+	+	+	+	+	Policy HL8 supports the provision of play space facilities. This is likely to have a beneficial impact on all and particularly benefit children and parents, having a differential impact on 'Age' and 'Pregnancy and Maternity'.
Policy HL9: Health Impact Assessment (HIA)	+	+	+	+	+	+	+	+	Policy PH9 requires development to undertake a Health Impact Assessment in line with the adopted City Corporation's Health Impact Assessment guidance note. This policy is likely to have a beneficial impact to all, including those with particular protected characteristics.

Strategic Policy SP2: Safe and Secure City

- 4.7 Strategic Policy S2 supports a secure and safe environment within the City mitigating the potential for crime, the fear of crime, anti-social behaviour and terrorism by requiring development to include design measures which will design-out crime and encourage natural surveillance. This policy will have a beneficial impact for all, and differentially impact those with particular protected characteristics such as women and girls, (Sex), young and older (Age) and disabled people (Disability).
- 4.8 The detailed policies under Strategic Policy S2 are assessed below in **Table 4.2**.

Table 4.2 – Strategic Policy S2: Safe and Secure City Policies Assessment

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
Policy SA1: Publicly accessible locations	+	+	+	+	+	+	+	+	Policy SA1 sets out the requirements to address the risk of terrorism in publicly accessible locations. This policy is likely to have a beneficial impact to all, including those with particular protected characteristics.
Policy SA2: Dispersal routes	+	+	+	+	+	+	+	+	Policy SA2 requires mitigation measures to be undertaken to reduce over-crowding, noise nuisance and anti-social behaviour in areas with night-time uses. This policy will have a beneficial impact on all, including those with particular protected characteristics. This policy will likely have a differential beneficial impact on groups who are more at risk of during night-time and in big crowds such as women

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
									(Sex), young and older (Age), those who belong to a certain ethnic group or religion (Race, Religion or belief), LGBT groups (Sexual orientation & gender reassignment) and disabled people (Disability).
Policy SA3: Designing in Security	+	+	+	+	+	+	+	+	Policy SA3 sets out the security principles to be undertaken in proposals to ensure public safety and that accessibility barriers to the public realm are minimised. This policy will have a beneficial impact for all, but differential impact those with particular protected characteristics such as women (Sex), young and older (Age), those who belong to a certain ethnic group or religion (Race, Religion or belief), LGBT groups (Sexual orientation & gender reassignment) and disabled people (Disability), who have a higher risk of threat of feeling unsafe in public spaces or who might experience difficulties in navigating the public realm.

## Housing

### Strategic Policy S3: Housing

- 4.9 Strategic Policy S3 sets out the minimum housing provision for the City of London at a minimum of 1,998 net new homes between 2023/24 and 2039/40. Housing development is encouraged in or near identified residential areas. Affordable housing, co-living, build to rent, hostels, sheltered and extra-care housing should be prioritised. This policy will have a beneficial impact for all, including those with particular protected characteristics.
- 4.10 A minimum provision of 50% affordable housing is expected on public sector land and 35% of private sector land with the potential for 10 or more units. The provision of affordable housing is likely to have a differential impacts on groups who are more vulnerable to changes in housing circumstances such as women (Sex, Pregnancy and maternity), disabled people (Disability), young and old (Age).
- 4.11 The policy requires at least 10% of the new dwellings to meet Building Regulation requirement M4(3) 'wheelchair user dwellings' and all other new dwellings to meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'. This is likely to have a positive differential impact on those with "Disability" as a protected characteristic.
- 4.12 The detailed policies under Strategic Policy S3 are assessed below in **Table 4.3**.

Table 4.3 – Strategic Policy S3: Housing Policies Assessment

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
Policy HS1: Location of New Housing	+	+	+	+	+	+	+	+	Policy HS1 sets out the principles for choosing a suitable location for housing. This policy will have a beneficial impact for all, including those with particular protected characteristics.
Policy HS2: Loss of housing	+	+	+	+	+	+	+	+	Policy HS2 protects existing housing provision. This policy is likely to have a beneficial impact to all, including those with particular protected characteristics.
Policy HS3: Residential environment	+	+	+	+	+	+	+	+	Policy HS3 protects residential uses from noise disturbance from new development and seeks to ensure privacy for overlooking. This policy will likely have a beneficial impact for all, including those with particular protected characteristics.
Policy HS4: Housing quality standards	+	+	+	+	+	+	+	+	Policy HS4 sets out the housing quality standards for new development to facilitate health and wellbeing of occupants. This policy will likely have a beneficial impact for all, including those with particular protected characteristics.
Policy HS5: Short term residential letting	+	+	+	+	+	+	+	+	Policy HS5 restricts the provision of short term letting to protect the existing housing stock and residents. This policy will likely have a beneficial impact for all,



Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
									including those with particular protected characteristics.
Policy HS6: Student accommodation and hostels	+	+	+	+	+	+	+	+	Policy HS6 sets out the principles for Purpose-Build Student Accommodation provision. This policy is likely to have a beneficial impact for all and differential beneficial impact on students (Age).
Policy HS7: Older persons housing	+	+	+	+	+	+	+	+	Policy HS7 sets out the principles for older person housing. This policy is likely to have a beneficial impact for all, and is differentially beneficial impact for older people (Age).
Policy HS8: Self and custom housebuilding	+	+	+	+	+	+	+	+	Policy HS8 encourages the provision of self and custom built units. This policy will likely have a beneficial impact for, including those with particular protected characteristics.

## Offices

### Strategic Policy S4: Offices

4.13 Strategic Policy S4 encourages the provision of office floorspace to increase the City's office floorspace stock by a minimum of 1,200,000 m<sup>2</sup> net between 2021 and 2040. New floorspace should be designed to be flexible to allow the transformation and

adaptation of space to support new uses, different layouts and configurations, different types and sizes of occupiers, and to meet the needs of SMEs, start-up companies, creative industries and those requiring move-on accommodation.

- 4.14 Retrofitting of existing office buildings for office use and upgrades to their environmental performance and the quality of accommodation is also encouraged. Where appropriate, the provision of affordable office workspace that allows small and growing businesses the opportunity to take up space within the City is also supported.
- 4.15 This policy supports employment creation and therefore is likely to have a beneficial impact for all, including for those with particular protected characteristics. The detailed policies under Strategic Policy S4 are assessed below in **Table 4.4**.

Table 4.4 – Strategic Policy S4: Offices Policies Assessment

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
Policy OF1: Office Development	+	+	+	+	+	+	+	+	Policy OF1 sets out the design standards for office space provision, including the inclusion of design measures which promote health and wellbeing. This is likely to have a beneficial impact for all, including those with particular protected characteristics.
Policy OF2: Protection of Existing Office Floorspace	+	+	+	+	+	+	+	+	Policy OF2 sets out principles to protect existing office floorspace. This is likely to have a beneficial impact for all, including those with particular protected characteristics.
Policy OF3: Temporary 'Meanwhile' Uses	+	+	+	+	+	+	+	+	Policy OF3 sets out the principles when temporary uses are encouraged. Meanwhile uses promote social cohesion and inclusion, and activate construction

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
									spaces, contributing to a sense of safety. This is likely to have a beneficial impact for all, including those with particular protected characteristics.

## Retail

### Strategic Policy S5: Retail and Active Frontages

- 4.16 Strategic Policy S5 encourages the provision of a greater mix of retail, leisure, entertainment, experience, culture and other appropriate uses across the City. The quantity and quality of retailing and the retail environment is particularly promoted across City’s four Principal Shopping Centres. This is likely to have a beneficial impact for all, including those with particular protected characteristics.
- 4.17 The detailed policies under Strategic Policy S5 are assessed below in **Table 4.5**.

Table 4.5 – Strategic Policy S5: Retail and active frontages Policies Assessment

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
Policy RE1: Principal Shopping Centres	+	+	+	+	+	+	+	+	Policy RE1 protects existing Principal Shopping Centres and active frontages. This is likely to have a beneficial impact for all, including those with particular protected characteristics. Active frontages contribute to personal perception of safety. Therefore, this policy will likely have a differential beneficial impact on groups who are more likely to feel unsafe in public spaces such as women (Sex), young and older (Age), those who belong to a certain ethnic group or religion (Race, Religion or belief), LGBT groups (Sexual orientation & gender reassignment) and disabled people (Disability).
Policy RE2: Active Frontages	+	+	+	+	+	+	+	+	Policy RE1 encourages the provision of active frontages at ground floor levels. This is likely to have a beneficial impact for all, including those with particular protected characteristics. Active frontages contribute to personal perception of safety. Therefore, this policy will likely have a differential beneficial impact on groups who are more likely to feel unsafe in public spaces such as women (Sex), young and older (Age) and disabled people (Disability).

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
Policy RE3: Specialist Retail Uses and Clusters	+	+	+	+	+	+	+	+	Policy RE3 supports retail uses and clusters in areas that are culturally and historically significant. This is likely to have a beneficial impact for all, including those with particular protected characteristics.
Policy RE4: Markets	+	+	+	+	+	+	+	+	Policy RE4 supports the provision of temporary markets and retail pop-ups to enhance the vitality of existing retail centres. This is likely to have a beneficial impact for all, including those with particular protected characteristics.

## Culture and Visitors

### Strategic Policy S6: Culture and Visitors

4.18 Strategic Policy S6 encourages the enhancement of the cultural offer, visitor experiences and infrastructure, and the City's evening and weekend economy to support a vibrant environment. This will contribute to creating a sense of social cohesion and providing means for interaction. This is likely to have a beneficial impact for all, including those with particular protected characteristics.

4.19 The detailed policies under Strategic Policy S6 are assessed below in **Table 4.6**.

Table 4.6 - Strategic Policy S6: Culture and Visitors Policies Assessment

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
Policy CV1: Protection of Existing Visitor, Arts and Cultural Facilities	+	+	+	+	+	+	+	+	Policy CV1 protects existing visitor, arts and cultural facilities. This is likely to have a beneficial impact for all, including those with particular protected characteristics.
Policy CV2: Provision of Arts, Culture and Leisure Facilities	+	+	+	+	+	+	+	+	Policy CV2 encourages the provision of new visitor, arts and cultural facilities to encourage visitor to the City. This is likely to have a beneficial impact for all, including those with particular protected characteristics.
Policy CV3: Provision of Visitor Facilities	+	+	+	+	+	+	+	+	Policy CV3 encourages the provision of facilities that meet the needs of visitors in new cultural developments, including children's play areas, seating, accessible toilets and well-designed signage. Whilst this is likely to have a beneficial impact for all, including those with particular protected characteristics, it is likely to have a differential beneficial impact for children (Age), people with a disability and the elderly who may require seating (Disability), people with prams (Pregnancy and Maternity) and those with visual impairment (Disability).

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
Policy CV4: Hotels	+	+	+	+	+	+	+	+	Policy CV4 sets out the principles where hotels and visitor accommodation are permitted. This is likely to have a beneficial impact for all, including those with particular protected characteristics.
Policy CV5: Evening and Night-Time Economy	+	+	+	+	+	+	+	+	Policy CV5 sets out the principles where evening and night-time economy uses can be provided to minimise the impact on residential uses. This is likely to have a beneficial impact for all.
Policy CV6: Public Art	+	++	+	++	++	++	+	+	Policy CV6 supports the provision of public art to enhance local identity. The policy requires that the location must take in consideration pedestrian safety, particularly disabled people. This is likely to have a beneficial impact for all, and a differential beneficial impact for disabled people (Disability). The policy aspires to provide inclusive and diverse artworks. This is likely to have a differential beneficial impact on those with "Race", "Religion and belief" and "Sex" as a protected characteristic by diversifying the art offer.

## Infrastructure

### Strategic Policy S7: Infrastructure and Utilities

- 4.20 SP7 ensures the new development facilitates the transition towards a zero carbon and climate resilient city. This is likely to be beneficial for everyone, including those with particular protected characteristics.
- 4.21 The detailed policies under Strategic Policy S7 are assessed below in **Table 4.7**.

Table 4.7 – Strategic Policy S7: Infrastructure and Utilities Policies Assessment

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
Policy IN1: Infrastructure provision and connection	+	+	+	+	+	+	+	+	Policy IN1 sets out the infrastructure requirements. This is likely to be beneficial for everyone, including those with particular protected characteristics.
Policy IN2: Infrastructure Capacity	+	+	+	+	+	+	+	+	Policy IN2 sets out the infrastructure capacity requirements. This is likely to be beneficial for everyone, including those with particular protected characteristics.
Policy IN3: Pipe Subways	+	+	+	+	+	+	+	+	Policy IN3 requires developments to use pipe subway routes where these are available. This is likely to be beneficial for everyone, including those with particular protected characteristics. The policy is likely to have a



Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
									differential positive effect on those with reduced mobility as it would improve pedestrian accessibility, and therefore impact those with "Age", "Disability" and "Pregnancy and maternity" as a protected characteristic.

## Design

### Strategic Policy S8: Design

- 4.22 Strategic Policy S8 sets out the requirements for sustainable design in new developments to build a net zero carbon City. The policy aims to secure vibrancy, inclusion and wellbeing through design measures that support a mix of uses and place people at the heart of the design.
- 4.23 The policy is likely to have a beneficial impact for everyone, including those with particular protected characteristics. By focusing on inclusivity, this policy is likely to have an especially beneficial impact on those with particular protected characteristics as it supports the consideration of specific needs these groups have during the design process of spaces and requires the anticipation their uses.
- 4.24 The detailed policies under Strategic Policy S8 are assessed below in **Table 4.8**.

Table 4.8 – Strategic Policy S8: Design Policies Assessment

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
Policy DE1: Sustainable Design	+	+	+	+	+	+	+	+	Policy DE1 states that development should take a retrofit first approach to existing buildings and support the most sustainable and suitable approach for the Site. The policy supports circular economy design measures and commitments to sustainability standards. This is likely to be beneficial for everyone, including those with particular protected characteristics.
Policy DE2: Design Quality	++	++	++	++	++	++	++	++	Policy DE2 sets out the design standards for new development, including the requirement to enhance pedestrian permeability and to ensure that buildings and public spaces are inclusive and accessible for everyone. The policy is likely to have a beneficial impact for everyone, including those with particular protected characteristics. By focusing on inclusivity of building design, this policy is likely to have a differential beneficial impact on those with particular protected characteristics as it supports the consideration of specific needs these groups could have during the design process.

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
Policy DE3: Public Realm	+	+	+	+	+	+	+	+	Policy DE3 requires development to provide high quality, inclusive, welcoming, well designed, safe and functional public realm. The policy is likely to have a beneficial impact for everyone, including those with particular protected characteristics. By focusing on inclusivity of the public realm, this policy is likely to have a differential beneficial impact on those with particular protected characteristics as it supports the consideration of specific needs these groups could have during the design process.
Policy DE4: Terraces and Elevated Public Spaces	+	+	+	+	+	+	+	+	Policy DE4 requires all tall buildings and major developments to provide free-to-enter, publicly accessible elevated spaces, such as roof gardens. This is likely to be beneficial for everyone, including those with particular protected characteristics.
Policy DE5: Shopfronts	+	+	+	+	+	+	+	+	Policy DE5 requires shopfronts to be designed at a high standard and promote active frontages. This is likely to be beneficial for everyone, including those with particular protected characteristics. The requirement to provide accessible entrance is likely to have a differential impact those with "Age", "Disability", and

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
									"Pregnancy and maternity" as a protected characteristic.
Policy DE6: Advertisements	+	+	+	+	+	+	+	+	Policy DE6 sets out the conditions for advertising displays. Excessive or obtrusive advertising, inappropriate illuminated signs and the display of advertisements above ground floor level will be resisted. This is likely to be beneficial for everyone, including those with particular protected characteristics.
Policy DE7: Daylight and sunlight	+	+	+	+	+	+	+	+	Policy DE7 requires development to demonstrate appropriate daylight and sunlight available to nearby dwellings and other sensitive receptors including schools, hospitals, hotels and hostels, places of worship and open spaces. This is likely to be beneficial for everyone, including those with particular protected characteristics but will likely have a differential beneficial effect on 'Age', 'Disability', 'Pregnancy and Maternity' and 'Religion or Belief'.
Policy DE8: Lighting	+	+	+	+	+	+	+	+	Policy DE8 sets out the requirements for internal and external lighting design. Improvements to the outdoor lighting conditions will also improve the safety and accessibility of public spaces. This policy will have a

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
									beneficial impact for all, but differential impact those with particular protected characteristics such as women (Sex), young and older (Age), those who belong to a certain ethnic group or religion (Race, Religion or belief), LGBT groups (Sexual orientation & gender reassignment) and disabled people (Disability), who may have a higher risk of threat of feeling unsafe in public spaces

## Transport

### Strategic Policy S9: Transport and Servicing

4.25 Strategic Policy S9 sets out how transport infrastructure will be maintained and improved, including promoting further improvements to public transport capacity and step-free access at existing mainline rail, London Underground stations, and river piers. This is likely to be beneficial for everyone, including those with particular protected characteristics. Improvements to accessibility will likely have a beneficial differential effect on those with restricted mobility (“Age”, “Disability” and “Pregnancy and Maternity”).

4.26 The detailed policies under Strategic Policy S9 are assessed below in **Table 4.9**.

Table 4.9 – Strategic Policy S9: Transport and Servicing Policies Assessment

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
Policy VT1: The Impacts of Development on Transport	+	+	+	+	+	+	+	+	Policy VT1 sets out the requirement to mitigate identified negative impacts on transport as a result of development. This is likely to be beneficial for everyone, including those with particular protected characteristics.
Policy VT2: Freight and Servicing	+	+	+	+	+	+	+	+	Policy VT2 sets out the requirements to mitigate freight and servicing trips as a result of development. This is likely to be beneficial for everyone, including those with particular protected characteristics.
Policy VT3: Vehicle Parking	+	++	+	+	+	+	+	+	Policy VT3 sets out the requirement for car-free developments with the exception of designated Blue Badge parking. This is likely to be beneficial for everyone, including those with particular protected characteristics, but will be particularly beneficial for those with 'Disability' as a protected characteristic.
Policy VT4: River Transport	+	+	+	+	+	+	+	+	Policy VT4 sets out the ambition to improve the riverside and the associated infrastructure. This is likely to be beneficial for everyone, including those with particular protected characteristics.
Policy VT5: Aviation landing facilities	+	+	+	+	+	+	+	+	Policy VT5 forbids heliports in the City and allows for helipads where they are essential for emergency or

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
									security purposes. This is likely to be beneficial for everyone, including those with particular protected characteristics.

### Strategic Policy S10: Active Travel and Healthy Streets

- 4.27 Strategic Policy S10 sets out the requirement to improve the quality and permeability of the public realm to enhance inclusivity and accessibility. The policy gives great consideration to the needs of wheelchair and disabled users. The policy is likely to be beneficial for everyone, including those with particular protected characteristics. The policy is likely to be particularly beneficial for those with "Age", "Disability" and "Pregnancy and Maternity" as a protected characteristic as it requires inclusive design.
- 4.28 The detailed policies under Strategic Policy S10 are assessed below in **Table 4.10**.

Table 4.10 – Strategic Policy S10: Active Travel and Healthy Streets Policies Assessment

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
Policy AT1: Pedestrian Movement, Permeability and Wayfinding	+	+	+	+	+	+	+	+	Policy AT1 sets out the requirement for development to contribute to the improvement of pedestrian permeability. The policy is likely to be beneficial for everyone, including those with particular protected characteristics. The policy is likely to be differentially beneficial for those with "Age", "Disability" and "Pregnancy and Maternity" as a protected characteristic as it requires an inclusive design of the public realm.
Policy AT2: Active Travel including Cycling	+	+	+	+	+	+	+	+	Policy AT2 sets out the requirement for developments to encourage active travel. The policy is likely to be beneficial for everyone, including those with particular protected characteristics. The policy requires suitable access to be delivered from pedestrian routes to accommodate to all mobility needs and therefore it is likely to be differentially beneficial to those with "Disability" as a protected characteristic.
Policy AT3: Cycle Parking	+	+	+	+	+	+	+	+	Policy AT3 sets out the requirement for developments to provide cycle parking spaces. The policy is likely to be beneficial for everyone, including those with particular protected characteristics.



## Heritage and Tall Buildings

### Strategic Policy S11: Historic Environment

4.29 Strategic Policy S11 sets out the vision for heritage-led regeneration which brings wider social, cultural, economic and environmental benefits. The policy is likely to be beneficial for everyone, including those with particular protected characteristics.

4.30 The detailed policies under Strategic Policy S11 are assessed below in **Table 4.11**.

Table 4.11 – Strategic Policy S11: Historic Environment Policies Assessment

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
Policy HE1: Managing Change to the Historic Environment	+	+	+	++	++	+	+	+	Policy HE1 sets out the conditions to be considered when developing heritage assets. The policy is likely to be beneficial for everyone, including those with particular protected characteristics. A large majority of City's historic buildings are places of worship. The policy specifically safeguards the space around Bevis Marks Synagogue in order to preserve or enhance, where possible, the elements that contribute to its setting. By considering the impact on places of worship in the City, this policy is likely to have a beneficial impact on

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
									those with "Race" and "Religion and belief" as protected characteristics.
Policy HE2: Ancient Monuments and Archaeology	+	+	+	+	+	+	+	+	Policy HE2 sets out the requirement to protect sites with archaeological potential and ancient monuments. The policy is likely to be beneficial for everyone, including those with particular protected characteristics.
Policy HE3: Setting of the Tower of London World Heritage Site	+	+	+	+	+	+	+	+	Policy HE3 sets out the requirement to protect the Tower of London World Heritage Site. The Tower of London World Heritage Site. The policy is likely to be beneficial for everyone, including those with particular protected characteristics.

### Strategic Policy S12: Tall Buildings

4.31 Strategic Policy S12 sets out the considerations that need to be taken into account when building tall buildings (having a height of over 75m) in order to protect the City skyline and ensure quality of the design. The policy is likely to be beneficial for everyone, including those with particular protected characteristics.

Strategic Policy S13: Protected Views

4.32 Strategic Policy S13 sets out the requirement to protect and enhance significant City and London view of important buildings, townscape and skylines. The policy is likely to be beneficial for everyone, including those with particular protected characteristics.

Open Spaces and Green Infrastructure

Strategic Policy S14: Open Spaces and Green Infrastructure

4.33 Strategic Policy S14 sets out the ambition to provide a greener City by protecting and enhancing existing open spaces and providing new green infrastructure. The policy is likely to be beneficial for everyone, including those with particular protected characteristics.

4.34 The detailed policies under Strategic Policy S14 are assessed below in **Table 4.12**.

Table 4.12 – Strategic Policy S14: Open Spaces and Green Infrastructure Policies Assessment

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
Policy OS1: Protection and provision of open space	+	+	+	+	+	+	+	+	Policy OS1 sets out the requirements to protect existing publicly accessible open spaces and increase the provision through development. The policy requires open spaces to be designed for all communities in the City and to be free, accessible, welcoming and inclusive. This policy is likely to be beneficial for

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
									everyone, and it is likely to have a differential beneficial impact on those with particular protected characteristics by ensuring spaces are inclusive and accessible.
Policy OS2: Urban Greening	+	+	+	+	+	+	+	+	Policy OS2 requires that the provision of urban greening should be integral to the design and layout of buildings, delivering an Urban Greening Factor of 0.3 as a minimum. The policy is likely to be beneficial for everyone, including those with particular protected characteristics.
Policy OS3: Biodiversity	+	+	+	+	+	+	+	+	Policy OS3 requires development to incorporate measures that enhance biodiversity. The policy is likely to be beneficial for everyone, including those with particular protected characteristics.
Policy OS4: Biodiversity Net Gain	+	+	+	+	+	+	+	+	Policy OS4 sets out the requirement for major developments to deliver Biodiversity Net Gain to conserve and enhance biodiversity. The policy is likely to be beneficial for everyone, including those with particular protected characteristics.
Policy OS5: Trees	+	+	+	+	+	+	+	+	Policy OS5 sets out the ambition to increase the number of trees and their overall canopy in the City. The policy is likely to be beneficial for everyone,

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
									including those with particular protected characteristics.

## Climate Resilience

### Strategic Policy S15: Climate Resilience and Flood Risk

- 4.35 Strategic Policy S15 sets out the requirement for Buildings and the public realm must be designed to be adaptable to future climate conditions and resilient to more frequent extreme weather events. The policy is likely to be beneficial for everyone, including those with particular protected characteristics.
- 4.36 The detailed policies under Strategic Policy S15 are assessed below in **Table 4.13**.

Table 4.13 – Strategic Policy S15: Climate Resilience and Flood Risk Policies Assessment

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
Policy CR1: Overheating and Urban Heat Island Effect	+	+	+	+	+	+	+	+	Policy CR1 sets out the requirement to demonstrate that their developments have been designed to reduce the risk of overheating through design. The policy is likely to be beneficial for everyone, including those with particular protected characteristics. The very young and old are more likely to have a health risk due to overheating, therefore the policy is likely to have a differential positive impact on those with "Age" as a protected characteristic.
Policy CR2: Flood Risk	+	+	+	+	+	+	+	+	Policy CR2 sets out the requirement for developments to consider flood risk. The policy is likely to be beneficial for everyone, including those with particular protected characteristics.
Policy CR3: Sustainable drainage systems (SuDS)	+	+	+	+	+	+	+	+	Policy CR3 sets out the requirement for all development, transportation and public realm proposals to consider SuDs principles in the design of the schemes. The policy is likely to be beneficial for everyone, including those with particular protected characteristics.

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
Policy CR4: Flood protection and flood defences	+	+	+	+	+	+	+	+	Policy CR4 sets out the requirement for development to protect and enhance where possible the effectiveness of structures intended to minimise flood risk. The policy is likely to be beneficial for everyone, including those with particular protected characteristics.

Strategic Policy S16: Circular Economy and Waste

- 4.37 Strategic Policy S16 sets out the vision for City Corporation to support businesses and residents moving towards a Zero Waste City. The policy is likely to be beneficial for everyone, including those with particular protected characteristics.
- 4.38 The detailed policies under Strategic Policy S16 are assessed below in **Table 4.14**.

Table 4.14 – Strategic Policy S16: Circular Economy and Waste Policies Assessment

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
Policy CE1: Sustainable Waste Facilities and Transport	+	+	+	+	+	+	+	+	Policy CE1 requires all development proposals to incorporate waste facilities. The policy is likely to be beneficial for everyone, including those with particular protected characteristics.
Policy CE2: New waste management sites	+	+	+	+	+	+	+	+	Policy CE2 sets out the design and management requirements for new facilities for waste management, handling and transfer. The policy is likely to be beneficial for everyone, including those with particular protected characteristics.

The Temples, the Thames Policy Area and the Key Areas of Change

- 4.39 The following section presents an assessment for Strategic Strategies that refer to a spatial area within the City. The assessment is presented in **Table 4.15**.



Table 4.15 – Spatial Strategic Policies Assessment

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
Policy TP1: The Temples	+	+	+	+	+	+	+	+	Policy TP1 sets out the ambition for the City Corporation to continue to support the unique functions of the Inner and Middle Temples as places of education and training and providers of common and collegiate facilities for barristers and students. The policy is likely to be beneficial for everyone, including those with particular protected characteristics. The policy also supports improvements to accessibility within buildings and therefore it is likely to have a differential positive effect on those with "Disability" as a protected characteristic.
Strategic Policy S17: Thames Policy Area	+	+	+	+	+	+	+	+	Strategic Policy S17 sets the requirement to enhance the unique character of the City riverside for transport and recreation. The policy is likely to be beneficial for everyone, including those with particular protected characteristics. The policy requires improvements to the pedestrian routes by widening the riverside walk which is likely to have a differential beneficial impact on those with restricted mobility ("Age", "Disability" and "Pregnancy of Maternity" as a protected characteristics).

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
Strategic Policy S18: Blackfriars	+	+	+	+	+	+	+	+	<p>Strategic Policy S18 sets out the requirements to enhance the character and amenities of the Blackfriars Key Area of Change, including supporting redevelopment and refurbishment of existing post-war buildings and enhancing pedestrian permeability and accessibility, especially through improvements to and along the riverside.</p> <p>The policy is likely to be beneficial for everyone, including those with particular protected characteristics. By delivering improvements to the accessibility of buildings and public spaces, the policy is likely to have a differential beneficial impact on those with restricted mobility ("Age", "Disability" and "Pregnancy of Maternity" as a protected characteristics).</p>
Strategic Policy S19: Pool of London	+	+	+	+	+	+	+	+	<p>Strategic Policy S19 sets out the requirement to refurbish and redevelop the building stock and public realm around the Pool of London Key Area of Change to contribute to a vibrant, welcoming and accessible environment.</p> <p>The policy is likely to be beneficial for everyone, including those with particular protected</p>

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
									characteristics. By delivering improvements to the accessibility of buildings and public spaces, the policy is likely to have a differential beneficial impact on those with restricted mobility ("Age", "Disability" and "Pregnancy of Maternity" as a protected characteristic).
Strategic Policy S20: Aldgate, Tower and Portsoken	+	+	+	+	+	+	+	+	Strategic Policy S20 sets out the strategic vision of Aldgate, Tower and Portsoken Key Area of Change to provide a mixed-use area that supports commercial, residential, education and hotel uses. The policy also supports enhancing the public realm and open spaces in various area by improving permeability. The policy is likely to be beneficial for everyone, including those with particular protected characteristics. By delivering improvements to the accessibility of buildings and public spaces, the policy is likely to have a differential beneficial impact on those with restricted mobility ("Age", "Disability" and "Pregnancy of Maternity" as a protected characteristic).

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
Strategic Policy S21: City Cluster	+	+	+	+	+	+	+	+	<p>Strategic Policy S21 sets out the strategic vision for the City Cluster Key Area of Change to accommodate significant growth in the office floorspace and complementary land uses to support employment growth. The policy is likely to be beneficial for everyone, including those with particular protected characteristics.</p> <p>The policy safeguards the immediate settings of Bevis Marks Synagogue to protect and enhance the historical elements of the Synagogue. This is likely to be particularly beneficial for users of the Synagogue, therefore impact the "Religion or belief" and "Race" protected characteristic.</p> <p>The policy also requires the improvement of streets, spaces and the public realm to improve connectivity and accessibility. This is likely to have a differential beneficial impact on those with restricted mobility ("Age", "Disability" and "Pregnancy or Maternity" as a protected characteristic).</p>
Strategic Policy S22: Fleet Street and Ludgate	+	+	+	+	+	+	+	+	Strategic Policy S22 sets out the strategic vision for the Fleet Street and Ludgate Key Area of Change as a centre for judicial and related businesses a royal and

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
									state processional route and a Principal Shopping Centre. The policy is likely to be beneficial for everyone, including those with particular protected characteristics.
Strategic Policy S23: Smithfield and Barbican	+	+	+	+	+	+	+	+	Strategic Policy S23 sets out the strategic vision to improve the Smithfield and Barbican Area and encourage culture-led mixed use development to complement existing uses. The policy is likely to be beneficial for everyone, including those with particular protected characteristics.
Strategic Policy S24: Smithfield	+	+	+	+	+	+	+	+	Strategic Policy S24 sets out the strategic vision to protect and enhance the mixed-use historic character of Smithfield. The policy is likely to be beneficial for everyone, including those with particular protected characteristics.
Strategic Policy S24: Liverpool Street	+	+	+	+	+	+	+	+	Strategic Policy S25 sets out the strategic vision for Moorgate-Liverpool Street Area to support the development of flexible office space, additional retail and leisure opportunities to establish a destination area. The policy is likely to be beneficial for everyone, including those with particular protected characteristics.

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
									The policy also supports improved wayfinding, pedestrian connection, improved pedestrian routes in and around bus stations, provision of seating and overall improvements to the accessibility and capacity of Liverpool Street Station. This is likely to have a differential beneficial impact on those with restricted mobility ("Age", "Disability" and "Pregnancy or Maternity" as a protected characteristic).

## Implementation

### Strategic Policy S26: Planning Contributions

- 4.40 Strategic Policy S26 sets out the conditions for seeing appropriate contributions from developers to manage and mitigate the impact of development through the Community Infrastructure Levy and Section 106 planning obligations. The policy is likely to be beneficial for everyone, including those with particular protected characteristics.

### Strategic Policy PC1: Viability Assessment

- 4.41 Policy PC1 requires development proposals to carry out viability assessments to demonstrate the financial viability of the scheme. The policy is likely to be beneficial for everyone, including those with particular protected characteristics.

# Appendix 1 – Baseline Data

Measure	Camden	Hackney	Islington	Lambeth	Southwark	Tower Hamlets	Westminster	CoL	London	
Resident Population (Census 2021)										
<i>Total Population</i>										
Population 2011 Census	220,300	246,270	206,125	303,086	206,125	254,096	8,170,000	<b>7,375</b>	8,170,000	
Population 2021 Census	8,600	259,148	216,587	317,662	216,587	310,303	8,800,000	<b>8,583</b>	8,800,000	
Population Growth	16%	5%	5%	5%	5%	22%	8%	<b>16%</b>	8%	
<i>Age</i>										
Age Structure 2021 Census	Aged 0-15	15%	19%	15%	15%	17%	19%	13%	<b>7%</b>	19%
	Aged 16-74	79%	78%	81%	81%	80%	79%	81%	<b>87%</b>	75%
	Aged 75+	5%	3%	4%	4%	3%	2%	5%	<b>6%</b>	5%
<i>Sex</i>										
Male/ Female	55%/ 45%	49%/ 51%	52%/48%	52%/48%	52%/48%	50%/50%	49%/ 51%	<b>55%/ 45%</b>	49%/51%	
<i>Marriage and Civil Partnership Status</i>										
Never married and never registered a civil partnership	56%	60%	62%	62%	60%	58%	54%	<b>57%</b>	46%	
Married	31%	27%	25%	25%	26%	32%	32%	<b>29%</b>	40%	
In a registered civil partnership	1%	0%	1%	1%	1%	0%	0%	<b>1%</b>	0%	
Separated, but still legally married or still legally in a civil partnership	2%	3%	2%	3%	3%	2%	2%	<b>2%</b>	2%	

Measure	Camden	Hackney	Islington	Lambeth	Southwark	Tower Hamlets	Westminster	CoL	London	
Divorced or civil partnership dissolved	7%	7%	7%	7%	7%	5%	8%	<b>7%</b>	7%	
Widowed or surviving civil partnership partner	3%	3%	3%	3%	3%	3%	3%	<b>3%</b>	4%	
<i>Gender Reassignment</i>										
Gender identity different from the one registered at birth	0.8%	1.1%	0.9%	0.9%	1.2%	1.0%	0.7%	<b>0.5%</b>	0.9%	
Not Answered	8%	10%	7%	7%	7%	8%	9%	<b>7%</b>	8%	
<i>Sexual Orientation</i>										
Gay, Lesbian or Bisexual	6%	7%	7%	8%	7%	6%	5%	<b>10%</b>	4%	
Not Answered	11%	13%	10%	9%	9%	10%	11%	<b>10%</b>	10%	
<i>Pregnancy and Maternity</i>										
General Fertility Rate	40.6	54.4	42.4	40.0	42.0	45.9	39.1	<b>27.7</b>	52.9	
<i>Race</i>										
Ethnicity	White	60%	53%	62%	55%	51%	39%	55%	<b>65%</b>	54%
	Mixed/Multiple	7%	7%	7%	8%	7%	5%	7%	<b>5%</b>	6%
	Asian/Asian British	18%	10%	10%	7%	10%	44%	17%	<b>17%</b>	21%
	Black/Black British	9%	21%	13%	24%	25%	7%	8%	<b>3%</b>	14%
	Other	7%	9%	7%	6%	6%	4%	13%	<b>6%</b>	6%
Place of Birth	UK	55%	60%	60%	61%	59%	53%	44%	<b>50%</b>	59%
	Europe (excluding UK)	18%	17%	18%	15%	14%	16%	23%	<b>22%</b>	16%
	Africa	6%	8%	6%	9%	11%	4%	7%	<b>4%</b>	7%



Measure		Camden	Hackney	Islington	Lambeth	Southwark	Tower Hamlets	Westminster	CoL	London
	Middle East and Asia	14%	7%	7%	5%	7%	22%	17%	<b>14%</b>	13%
	Americas and Caribbean	6%	7%	6%	9%	8%	4%	7%	<b>7%</b>	4%
	Antarctica and Oceania	1%	2%	2%	1%	1%	1%	1%	<b>2%</b>	1%
Main Languages	English	79%	80%	81%	82%	82%	73%	74%	<b>78%</b>	78%
	European (EU)	10%	9%	10%	12%	11%	10%	13%	<b>13%</b>	10%
	European (Non-EU)	2%	5%	3%	1%	1%	1%	3%	<b>2%</b>	2%
	South Asian	2%	2%	1%	1%	1%	12%	2%	<b>1%</b>	6%
	East Asian	3%	1%	2%	1%	2%	2%	3%	<b>4%</b>	1%
	African	1%	1%	2%	2%	2%	1%	1%	<b>0%</b>	1%
	West/Central Asian	1%	1%	1%	0%	1%	0%	2%	<b>0%</b>	1%
	Other	0%	0%	0%	0%	0%	0%	0%	<b>1%</b>	1%
<i>Religion and Belief</i>										
Christian		31%	31%	35%	44%	43%	22%	37%	<b>35%</b>	41%
Buddhist		1%	1%	1%	1%	1%	1%	1%	<b>1%</b>	1%
Hindu		2%	1%	1%	1%	1%	2%	2%	<b>2%</b>	5%
Jewish		5%	7%	1%	0%	0%	0%	3%	<b>2%</b>	2%
Muslim (Islam)		16%	13%	12%	8%	10%	40%	20%	<b>6%</b>	15%
Sikh		0%	1%	0%	0%	0%	0%	0%	<b>0%</b>	2%
Other religion		1%	2%	1%	1%	1%	1%	1%	<b>1%</b>	1%
No religion		35%	36%	41%	38%	36%	27%	26%	<b>44%</b>	27%
Not Answered		9%	9%	8%	8%	7%	7%	9%	<b>9%</b>	41%

Measure		Camden	Hackney	Islington	Lambeth	Southwark	Tower Hamlets	Westminster	CoL	London
<i>Health and Disability</i>										
Self-Assessed Health	Very good & Good	85%	85%	84%	86%	86%	85%	85%	<b>89%</b>	85%
	Fair	10%	10%	10%	10%	10%	10%	10%	<b>8%</b>	10%
	Bad & Very Bad	5%	5%	6%	4%	4%	5%	5%	<b>3%</b>	4%
Disability under the Equality Act	Day-to-day activities limited a lot	7%	6%	7%	5%	6%	6%	6%	<b>3%</b>	6%
	Day-to-day activities limited a little	8%	8%	9%	8%	8%	7%	7%	<b>7%</b>	7%
<b>Workday Population (Annual Population Survey, July 2022 to June 2023)</b>										
<b>Total Workday Population</b>		<b>191,000</b>	<b>129,000</b>	<b>144,000</b>	<b>172,000</b>	<b>381,000</b>	<b>223,000</b>	<b>374,000</b>	<b>770,000</b>	5,040,000
Sex	Female	52%	43%	44%	45%	41%	43%	42%	<b>39%</b>	46%
	Male	48%	57%	56%	55%	59%	57%	58%	<b>61%</b>	54%
Age	Aged 16 – 19	2%	n/a	1%	n/a	1%	2%	2%	<b>2%</b>	1%
	Aged 20 – 24	3%	10%	7%	5%	9%	8%	6%	<b>7%</b>	7%
	Aged 25 - 49	62%	63%	73%	71%	66%	72%	72%	<b>70%</b>	68%
	Aged 50 +	38%	29%	22%	27%	26%	21%	21%	<b>22%</b>	27%

21 Soho Square  
London  
W1D 3QP

0203 597 1000  
[hello@quod.com](mailto:hello@quod.com)

