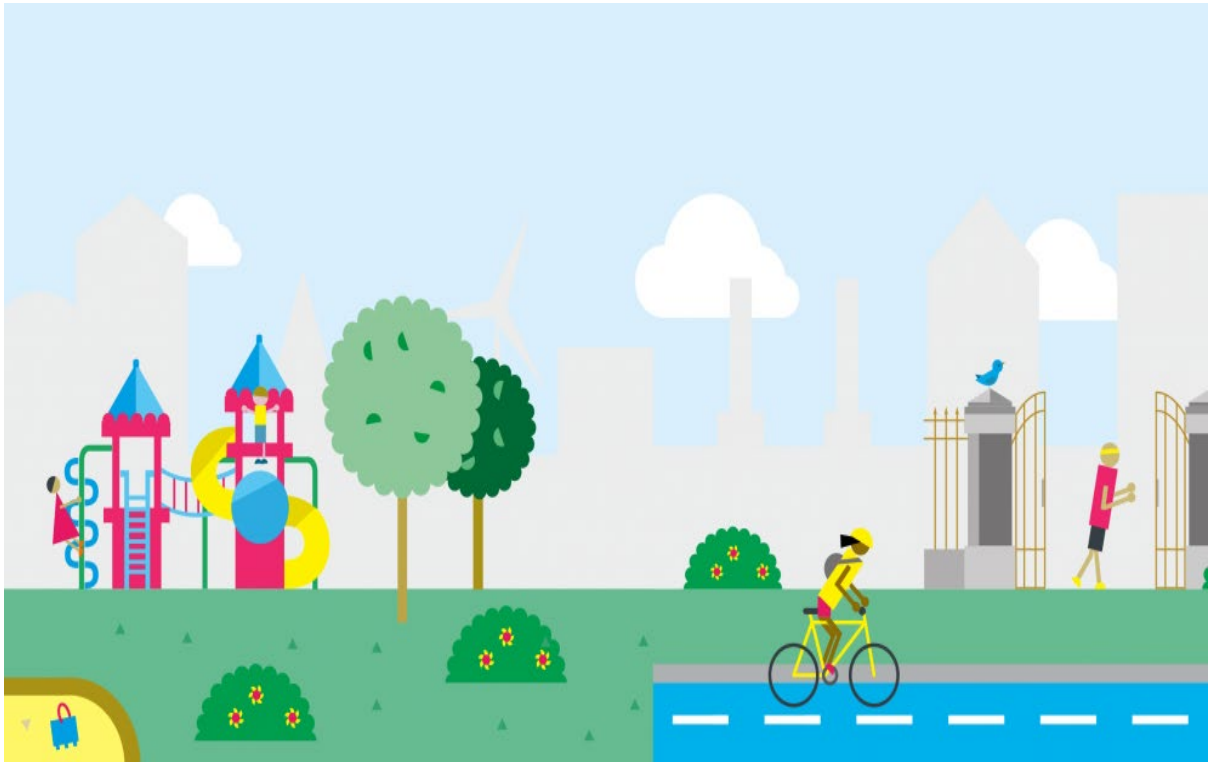City of London

IIA Annex 1: Equalities and Health Impact Scoping Assessment
City Plan 2036 Proposed Submission Draft

March 2021

Contents

Chapter 1: Introduction

1.1   The Town and Country Planning (Local Planning) (England) Regulations 2012 as amended set out a regulatory requirement for local and unitary authorities to develop and adopt a Local Plan which will make clear what is intended to happen in the area over the life of the plan, where and when this will occur, and how it will be delivered. This can be done by setting out broad policies as well as specific allocations of land for different purposes.

1.2   The City of London Corporation's current Local Plan was adopted in 2015 and is now being reviewed. The revised Local Plan, (Proposed Submission City Plan 2036), sets out the City Corporation's vision, strategy and objectives for planning the City of London for the next 15 years, together with policies that will guide future decisions on planning applications. This Plan has been the subject of two rounds of public consultation and will be published in March 2021 for a final consultation period before being submitted to the Secretary of State for examination.

1.3   The Mayor of London's latest Plan (The London Plan – Publication version December 2020), which the City Plan 2036 must be in general conformity with, advises that to improve Londoners' health and reduce inequalities, those involved in planning and development must:

"support and promote the creation of an inclusive London where all Londoners, regardless of their age, disability, gender, gender identity, marital status, religion, race, sexual orientation, social class, or whether they are pregnant or have children, can share in its prosperity, culture and community, minimising the barriers, challenges and inequalities they face".
(Policy GG1: Building Strong and Inclusive Communities).

"assess the potential impacts of development proposals and Development Plans on the mental and physical health and wellbeing of communities, in order to mitigate any potential negative impacts, maximise potential positive impacts, and help reduce health inequalities, for example through the use of Health Impact Assessments".
(GG3: Creating a Healthy City).

1.4   Integrated Impact Assessments (IIA's) are recommended to be carried out on development plans. IIA's identify the likely effects of a plan in relation to sustainability, equalities and health and the need for any additional measures to mitigate adverse effects identified by the assessments. Carrying out an IIA ensures the local planning authority takes properly informed decisions when developing new policies.

1.5   An Integrated Impact Assessment (IIA) has been undertakenut on the City Plan 2036 covering Sustainability Appraisal (SA), Health Impact Assessment

screening (HIA) and Equalities Impact Assessment screening (EqIA). The IIA addresses health and equalities issues by assessing the likely effects of the Plan in relation to two specific IIA objectives - Objective 13 Improved Health, and Objective 15 Equalities and Inclusion. It was decided, however, that a separate HIA and EqIA assessment should be carried out to draw out more nuanced issues and thoroughly explore whether the policies in the Plan will ensure the health and equality of the City's communities is adequately considered and promoted.

Equality

Equality is about ensuring that every individual has an equal opportunity to make the most of their lives and not experience discrimination because of who they are, where they come from, what they believe or whether they have a disability.

1.6   The Equality Act came into effect in October 2010 and replaced the Disability Discrimination Act and other anti-discrimination legislation. It legally protects people from discrimination in the workplace and in wider society.

1.7   Section 149 of the Equality Act (2010) sets out the general equality duty:

"A public authority must, in the exercise of its functions, have due regard to the need to –

(a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;

(b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;

(c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it."

1.8   In relation to this analysis, the main equality considerations include eliminating discrimination as far as possible and advancing equality of opportunity for all those likely to be affected by the Plan's policies.

Health

The definition of health is *"a state of complete physical, mental and social well-being and not merely the absence of disease or infirmity."*

(World Health Organisation 2019)

1.9   The Health and Social Care Act 2012 gave local authorities new duties and responsibilities for health improvement and protection and reducing health

inequalities. The Act requires every local authority to use the levers at its disposal to improve health and wellbeing.

1.10   To achieve this, public health teams have moved from the National Health Service (NHS) into local authorities and are working closely with planning officers to ensure local health issues are addressed. The planning process can help to promote the health and wellbeing of residents, workers and visitors through its role in shaping the built and natural environment. Effective planning can create the conditions for healthy, active lifestyles and influence people's ability to follow healthy behaviours.

1.11   In terms of this analysis, the main health considerations relate to the conditions for residents, visitors and workers when using the built environment, facilities and services, streets and the public realm.

Chapter 2: Methodology

Equalities Impact Assessment (EqIA)

2.1   To carry out an EqIA it is necessary to assess how potential policies in the Plan would affect groups with protected characteristics. The Equality Act 2010 establishes a number of groups with protected characteristics. The City Corporation has produced an Equality Analysis template which requires potential impacts on the following groups to be assessed:

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

2.2   A significant proportion of people in the City of London are not residents or workers, therefore the impacts on the wider public who use the City's public realm and buildings and services have been assessed.

2.3   The equalities assessment of the Plan determines the impact the policies in the Plan have on people with protected characteristics, in accordance with the aims of the EqIA. It also, where appropriate, provides recommendations for what actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations.

Health Impact Assessment (HIA)

2.4   The policies in the Plan will also need to create healthy conditions for residents, workers, students and visitors to the City.

2.5   In order to carry out the HIA, the Healthy Urban Planning Checklist has been used. This was developed by the London Health Urban Development Unit (HUDU). The most recent checklist was published in 2015. It aims to promote healthy urban planning by ensuring that health and wellbeing implications of local plans and major planning applications are consistently taken into account.

2.6   The checklist is divided into the following key themes:

1. Healthy housing

2. Active travel

3. Healthy environment

4. Vibrant neighbourhoods

2.7   Each theme contains a number of questions focussed on a planning issue. Under each theme there are a number of related health and wellbeing issues, many of which are identified in local joint strategic needs assessments and health and wellbeing strategies. The table below outlines these themes and issues. The City Plan contains policies concerned with a wide range of issues relevant to land use and the built environment, therefore all the themes and issues outlined below are relevant to the Health Impact Assessment of the Proposed Submission Draft Plan.

Theme	Planning Issue	Health and wellbeing issue
1. Healthy housing	-Housing design -Accessible housing -Healthy living -Housing mix and affordability	-Lack of living space –overcrowding -Unhealthy living environment - daylight, ventilation, noise -Excess deaths due to cold/overheating -Injuries in the home -Mental illness from social isolation and fear of crime
2. Active travel	-Promoting walking and cycling -Safety -Connectivity -Minimising car use	-Physical inactivity, cardiovascular disease and obesity -Road and traffic injuries -Mental illness from social isolation -Noise and air pollution from traffic
3. Healthy Environment	-Construction -Air quality -Noise -Contaminated land -Open space -Play space -Biodiversity -Local food growing -Flood risk -Overheating	-Disturbance and stress caused by construction activity -Poor air quality – lung and heart disease -Disturbance from noisy activities and uses -Health risks from toxicity of contaminated land -Physical inactivity, cardiovascular disease and obesity -Mental health benefits from access to nature and green spaces and water -Opportunities from food growing - active lifestyles, healthy diet and tackling food poverty -Excess summer deaths due to overheating
4. Vibrant Neighbourhoods	-Healthcare services -Education -Access to social infrastructure -Local employment and healthy - workplaces -Access to local food shops -Public buildings and spaces	-Access to services and health inequalities -Mental illness and poor self-esteem associated with unemployment and poverty -Limited access to healthy food linked to obesity and related diseases -Poor environment leading to physical inactivity -Ill health exacerbated through isolation, lack of social contact and fear of crime

2.8   Information sources for the assessment include baseline technical data and qualitative assessments gathered by the City of London Corporation.

2.9   The assessment determines the City Plan's impact on health. Where appropriate, recommendations are provided to avoid or mitigate any negative impacts.

Chapter 3: Context

Equalities

3.1   The City of London Corporation recognises eight priority groups with protected characteristics that are considered when an EqIA is carried out:

Age

Many older people experience high levels of isolation and poverty. For this reason, it is necessary to ensure that appropriate affordable housing is provided in areas currently experiencing deficit. To prevent isolation and fear of going out, it is important to create developments where there are good levels of social interaction, creating community cohesion. Ensuring that the design of the built environment takes their needs into consideration by creating spaces which include benches, public toilets, suitable lighting and adequate levels of overlooking can reduce concerns for safety and security and increase confidence in the public realm for older people. Suitable access to public transport, retail and medical facilities is also important to older people.

The City of London's children and young people have a range of needs and priorities. All young people need to be able to access play facilities and open space along with leisure and recreation facilities within the City and its fringe. It is important that these are of the right standard and that they are accessible to all children. The provision of local education facilities is also important, in close proximity to public transport and with walking and cycling routes provided wherever possible.

Disability

People with a disability who need to rely on mobility aids may struggle with the public realm and street layout which make the use of mobility aids more difficult. Vulnerable groups may feel increased fear for personal safety from competing street users and also vehicles on the roads.

Pregnancy and maternity

People with dependants often suffer from time constraints. Improved public transport, clustered or improved retailing and medical facilities can all help maximise time efficiency of this group. Difficulty in accessing buildings with small children and prams can be an issue.

Race

Access to employment is an important issue for BME groups and the provision of education, training and Small and Medium sized Enterprises (SME) business facilities are key to this. People from BME groups often experience difficulties gaining access to healthcare, either through lack of provision or discrimination, while fears for safety and security are also a key concern, along with experience of harassment. The provision and protection of community facilities is another important priority for BME groups.

<u>Religion or belief</u>

Faith groups can experience many of the same needs as BME groups, with a need for good quality housing, and access to employment. They may also experience discrimination and fear for their safety and security in public spaces.

<u>Sex</u>

For women, community safety is an important issue and linked to this are issues relating to the design and accessibility of the urban realm. Access to cheap, safe and reliable public transport and the provision of walking and cycling routes are key to maintaining mobility and independence for all. Access to employment is important for women. Policy should help reduce barriers through the provision of affordable childcare, small and medium size enterprise business facilities and good public transport accessibility.

<u>Sexual orientation and gender reassignment</u>

Lesbians, gay men, bisexuals and people with gender reassignment have particular concerns relating to their personal safety and security in the public realm, especially with regard to harassment. They also experience discrimination in accessing housing, employment and social facilities such as healthcare. Therefore, this group requires safe and secure public spaces with access to public transport, walking and cycling facilities and social facilities, including retail and recreation.

<u>Marriage and civil partnership</u>

Compared to many forms of discrimination, marriage and civil partnership discrimination can be a lot harder to pin down. Under the Equality Act 2010 a worker's right not to be discriminated against on the basis of marriage and civil partnership includes direct and indirect discrimination as well as victimisation.

Health

3.2   The City of London is an atypical area of London, as the residential population is very small compared to the daily workforce population, combined

with a very small geographical area of approximately one square mile. The health profile below summarises the City's population and health statistics using 2017 Public Health England[1] analysis and the ONS/GLA estimates of the population for 2019/2020[2].

Population

9,721 (Mid-2019 population estimate: ONS) / 7,561 (2020 GLA housing-led population projection). In addition, 522,500 people work in the City of London and there is a significant population of rough sleepers (street count of 105 in July-September 2020).

Life Expectancy

Life expectancy is better than both the London and England average. Male life expectancy at birth is 86.1 years, which is 6.8 years higher than the England average. Female life expectancy at birth is 89.0 years which is 6.0 years higher than England.

Child Health

In 2014, only 12.8% of children under 20 were living in poverty, this compares with 23.9% across London and 19.9% in England.

78.6% of children leaving reception in the City of London in 2015/16 were school ready compared with 71.2% in London and 69.3% in England.

Adult health

47.9% of adults in the City of London have excess weight as estimated in 2013-15. This is lower than both the London average (58.8%) and the England average (64.8%). Only 45.8% of residents are considered active in the City of London compared with 57.8% of all Londoners and 57.0% across England.

36.5% of the adult population eat the recommended '5-a-day' portions of fruit and vegetables. There are significantly fewer hospital admissions for alcohol related conditions in the City of London compared with England (585 vs. 647 per 100,000

[1] Public Health England (2017) City of London Health Profile 2017 [online] Available at: http://democracy.cityoflondon.gov.uk/documents/s86130/06%20-%20Appendix%202-%20City%20of%20London%20Health%20Profile%202017%203.pdf [Accessed 10/12/2020]
[2] Office for National Statistics (2020) Mid-2019: April 2020 local authority district codes edition of datasets [online] Available at:
https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesscotlandandnorthernireland [Accessed 10/12/2020]
Housing-led population projections - London Datastore

population) but significantly higher STI diagnoses in the under 25's (2,516 vs. 795 per 100,000 population).

The City of London had a higher proportion of mortality attributable to particulate air pollution at 7% than both London (5.6%) and England (4.7%).

COVID-19

3.3   On 11 March 2020, the World Health Organisation declared the coronavirus, known as COVID-19, a global pandemic.

3.4   The global pandemic has caused immense global disruption and suffering. The UK has been one of the worst affected countries, in terms of people's health and wellbeing, and economically.

3.5   Much of the City Plan 2036 was drafted prior to the outbreak of the COVID-19 pandemic. The pandemic has led to behavioural changes, some of which are temporary but some that are likely to become the 'new normal'. The increase in remote working is likely to remain important to the success of many City businesses in the future but reliance solely on remote working may limit the scope of creative innovation, collaboration and informal business relationships. Furthermore, the trend towards remote working is expected to be counteracted by a shift towards lower occupation densities and the provision of more breakout spaces within offices. It is also expected that building design will be more flexible and ensure the future transformation of space to different uses.

3.6   The pandemic has brought to light the importance of measures already proposed by the emerging City Plan 2036 for facilitating safe and convenient public transport services into and out of the City, together with measures to ensure active travel and pedestrian comfort within the City's boundaries. To provide more space for moving around in the City, pavements will be widened and road space will be reallocated for pedestrian and cycle use, alongside planting and greenery. Since these measures were already present in the emerging City Plan 2036, their beneficial effects were already recognised by the EqIA and HIA of the related policies.

3.7   The City Plan is looking beyond the current pandemic to a period when a vaccine has enabled the City to once more provide a vibrant centre of business creativity and innovation. Overall, it is expected that the City will remain an attractive base for a wide range of existing and new businesses, operating more flexibly with a blended approach of in-office and remote working. As set out in the City Plan 2036, the emergence of new trends resulting from the COVID-19 pandemic and its aftermath will be regularly monitored for their policy implications

Chapter 4: Conclusions and recommendations

4.1   The equalities and health impact scoping exercises demonstrated that there were no anticipated negative impacts resulting from the policies in the City Corporation's Proposed Submission Draft Plan and therefore it is not necessary to carry out further assessments.

Equalities

4.2   The equalities scoping (see detailed findings in Chapter 5) showed that the three protected characteristics of age, disability and pregnancy/maternity would particularly benefit from policies in the Plan. This would be expected due to the emphasis of the Plan on physical public realm improvements, promotion of good design to make buildings accessible, healthy streets principles and a widespread distribution of facilities. People in these categories would benefit from improved physical access due to reduced mobility due to age, disability and pregnancy.

4.3   Areas of uncertainty arose where policies create potential conflict while seeking to achieve specific goals e.g. improved security and protecting historic buildings and spaces. Both of these conflict areas are a result of policy goals that may alter the physical environment and make it harder for people to move around if they are restricted by age, disability or pregnancy. However, adequate security measures and the protection of the City's heritage are important for the continuation of the City's current position as a world financial centre with a unique heritage.

4.4   The Plan recognises these conflicts and strongly emphasises the need for the design of security features to create safe and accessible environments, which are welcoming and inclusive. Policies also recognise that historic buildings and spaces need to be accessible to people wherever possible and the Plan encourages maximising accessibility to new and existing buildings and spaces to create an inclusive environment. The Plan recognises that the adaptation of historic buildings presents particular challenges and requires careful design solutions. The City Corporation has an active programme of implementing access adaptations and is preparing guidance for developers.

4.5   To help understand to what extent the policies in the Plan as outlined above are successfully resolving the conflict between security and historic environment issues and the needs of people with certain protected characteristics, it would be appropriate for the City of London Access Group to carry out a survey. Access officers, with the assistance of planning officers, could choose a range of locations where security measures have been implemented and where an historic building or space has been refurbished and visit the sites to assess the ease of which people with mobility issues can freely and safely move around. The results of these surveys

could be fed back to officers responsible for progressing schemes with developers, and the Local Plans team, to help resolve conflict points.

Health

4.6   The health scoping assessment (see detailed findings in Chapter 6) demonstrated that mostly positive impacts would result from policies in the Plan. This was expected, as during the review and redrafting of the Plan, there was a significant focus on health issues and how the City's environment can be made more pleasant. Policies to increase green infrastructure, reduce pollution, encourage walking and cycling and achieve good amenity in buildings were prioritised.

4.7   The assessment exposed several areas of uncertainty. Under Key Theme 2: Active Travel, the conflict between security measures and possible disruption to walking and cycling was highlighted, mirroring the conflict highlighted in the Equalities assessment. Appropriate mitigation measures are suggested in the Equalities assessment above.

4.8   The analysis of Key Theme 3: Healthy Environment highlighted that there may be some conflict between including climate resilience measures in open spaces and their use for leisure and play. An example would be inserting SuDs in playgrounds that may interfere with free movement and play. The Plan recognises that as space is at a premium in the City, new developments and spaces must achieve measures that improve climate resilience while at the same time following good design principles and allowing public access. All major development must address climate resilience measures at the design stage in sustainability statements or in Design and Access Statements for minor developments. This will allow officers to ensure proposed measures in open spaces and in the public realm will consider how people, particularly children and people with mobility issues, will use the space.

4.9 Uncertainty was also highlighted in terms of the encouragement of deconstruction and recycling aggregates (and other materials) on site and whether this would cause pollution and noise disturbance. The Plan requires major applications to submit Circular Economy statements and applications for smaller developments to submit waste management plans. These statements and plans will help ensure consideration has been given to minimising disturbance and pollution from on-site waste and recycling operations.

4.10   The analysis of Key Theme 4: Vibrant Neighbourhoods demonstrated uncertainty as to whether policies in the Plan were adequately considering the impact of major development on health and health services. Sensitive development, (such as hospitals, schools and housing) could potentially be restricted in areas of high pollution, while an increasing residential population and workforce puts more

pressure on existing health services. When redrafting the policies in the Plan it was recognised that a method of assessing and trying to resolve conflicts between development and health impacts was needed. A new policy was included in the Plan which requires major development and smaller sensitive developments to carry out a Health Impact Assessment exercise to ensure the development has considered the possible impacts on people and services. A City-specific checklist and guidance note is being produced to guide applicants as to which issues are important for the unique circumstances of the City's population and built environment.

Chapter 5: Equalities Impact Assessment tables

Key to the Assessment Framework used on the following pages:

	Impact of implementing policy	Response to IIA assessment
↑	Significant positive impact	Consider whether further enhancement is possible
↑	Positive impact	Consider whether further enhancement is possible
↕	Uncertain impact	Consider policy wording changes and/ or mitigation and monitoring
↑↓	Both positive and negative impacts	Consider policy wording changes and/ or mitigation and monitoring
↓	Negative impact	Consider policy changes and/or mitigation
↓	Significant negative impact	Consider changing the policy
-	No impact	

↑	One arrow – local impact within the City
↑↑	Two arrows – regional impact within the rest of London
↑↑↑	Three Arrows – national or international impact beyond London

Protected Characteristics

Local Plan Strategic Policy	Age	Disability	Pregnancy & maternity	Race	Religion or belief	Sex	Sexual orientation & gender reassignment	Marriage & civil partnership	Comments
Policy S1: Healthy and inclusive City	↑	↑	↑	↑	↑	↑	↑	↑	The policy seeks to ensure all buildings and spaces are inclusive. This will benefit everyone but particularly people with disabilities and people who are pregnant. Enhanced education provision is likely to particularly benefit young people. A new policy requiring Health Impact Assessments from major developments has been included. This will particularly benefit older people, people with certain disabilities and people who are pregnant who are more likely to have health issues. The policy protects community infrastructure and facilities and supports new provision, seeks to reduce pollution and reduce adverse amenity impacts of development. This will benefit all groups. This policy is considered to benefit people across all equality groups, particularly those with mobility issues that might benefit from shorter journeys (including pregnant women and those with babies, younger people and people on low incomes).

Local Plan Strategic Policy	Age	Disability	Pregnancy & maternity	Race	Religion or belief	Sex	Sexual orientation & gender reassignment	Marriage & civil partnership	Comments
Policy S2: Safe and Secure City	↕	↕	↕	↑	↑	↑	↑	-	The policy requires development to provide an integrated approach to security of buildings and associated public and private spaces. The policy also requires developments vulnerable to terrorism to incorporate appropriate security measures in the design to improve the resilience for terrorism related crime. The requirement for a safe public realm is likely to benefit those who are more at risk of crime, typically women, young people, older people and those with disabilities, but also LGBTQI+ people and people of different ethnicity and/or belief who can be targets of hate crime. However, security measures may create physical barriers which create obstacles for older and younger people, people with disabilities and people who are pregnant.
Policy S3: Housing	↑	↑	-	↑	-	-	-	-	Policy emphasises on-site affordable housing, which will help residents on lower incomes. Policy encourages student housing to provide affordable housing, which will help residents on lower incomes, who are more likely to be younger, older and from particular ethnic groups. Policy requires 10% of all new dwellings to be 'wheelchair user dwellings', which will benefit people with disabilities.
Policy S4: Offices	↑	↑	-	↑	-	-	-	-	Policy encourages a wide range of offices which will provide a range of jobs therefore allowing employment opportunities for lower paid support staff who are more likely to be young, disabled or from certain ethnic minorities.

Local Plan Strategic Policy	Age	Disability	Pregnancy & maternity	Race	Religion or belief	Sex	Sexual orientation & gender reassignment	Marriage & civil partnership	Comments
Policy S5: Retailing	↑	↑	↑	-	-	-	-	-	Policy encourages a wide range of retailing units which will increase the range of jobs at different levels and therefore provide jobs for different age groups. A wide spread of retail facilities throughout the City will benefit elderly residents, people with disabilities and people who are pregnant who may be less able to use cars or public transport to access shops.
Policy S6: Culture, visitors & night-time economy	↑	↑	↑	↑	↑	↑	↑	↑	The policy seeks to balance the needs of visitors, businesses and residents in the City. The policy supports new art and cultural uses. Easier access to art and culture is expected to positively impact on the cultural wellbeing of communities, particularly older people who may be more likely to be isolated at home or religious / belief groups who may meet in places of worship or other cultural facilities. More cultural street activity will provide more surveillance contributing to deterring crime and the fear of crime. This is more likely to benefit people, particularly LGBTQI+ people and people of different ethnicity and/or belief who can be targets of hate crime.
Policy S7: Smart infrastructure & utilities	↑	↑	↑	↑	↑	↑	↑	↑	The policy requires development proposals to reduce energy demand for power, water and utility services and incorporate sustainable building design and demand management measures. Positive, non-differential impact. The policy is considered to benefit people across all equality groups.

Local Plan Strategic Policy	Age	Disability	Pregnancy & maternity	Race	Religion or belief	Sex	Sexual orientation & gender reassignment	Marriage & civil partnership	Comments
Policy S8: Design	↑	↑	↑	↑	↑	↑	↑	↑	Design policy requires accessibility for all to buildings and the public realm so would be beneficial to all. This would be particularly beneficial for older people, people with certain disabilities and people who are pregnant who are more likely to have health issues.
Policy S9: Vehicular transport and servicing	↑	↑	↑	↑	↑	↑	↑	↑	The policy ensures servicing, collection and delivery needs originating from new developments are limited through freight consolidation and car-free development, thereby minimising additional road congestion, which results in additional noise and air pollution. The Plan has added significant additional policy and text to help reduce pollution and car movements in the City, for instance promoting last-mile deliveries by foot, cycle or zero emission vehicles. This is likely to benefit all protected characteristics, particularly sensitive receptors including those with disabilities, children and young people, old people and people who are pregnant. Restricted parking provides for Blue Badge holders.
Policy S10: Active travel & healthy streets	↑	↑	↑	↑	↑	↑	↑	↑	This policy promotes Healthy Streets principles in line with London Plan guidance, which would benefit everyone but particularly older people, people with disabilities and possible health issues, children and young people and people who are pregnant.

Local Plan Strategic Policy	Age	Disability	Pregnancy & maternity	Race	Religion or belief	Sex	Sexual orientation & gender reassignment	Marriage & civil partnership	Comments
Policy S11: Historic environment	↕	↕	↕	-	↑	-	-	-	The policy requires development to be sensitively designed with regards to its context. There may be some conflict between protecting heritage assets and being able to improve accessibility for those with mobility issues, particularly those with disabilities, older people and pregnant women. On balance, as other policies in the Plan, (particularly S8) seek to ensure accessibility for people with disabilities wherever possible, the conflict will be minimised. Many places of worship are of historic interest and their protection is likely to benefit people from the relevant religious or belief groups.
Policy S12: Tall buildings	↑↓ -	↑↓ -	↑↓ -	-	-	-	-	-	This policy sets out a positive strategy for tall buildings and identifies locations where tall buildings may be appropriate. This contributes to enhanced townscape and public realm, and increased legibility, which supports sustainable transport choices such as walking and cycling. The policy requires the provision of free to enter, publicly accessible open space or other facilities at upper levels of new tall buildings. While the policy seeks to mitigate negative impacts on amenity and the public realm, such as wind, daylight and sunlight, and solar glare impacts, some protected characteristics might still be affected. Developments with amenity impacts are more likely to adversely affect workers and visitors who have a limited time frame to access the public realm at lunchtime.

Policy S13: Protected views									The policy protects identified viewing vistas. The policy has no particular impacts on protected characteristics.
	-	-	-	-	-	-	-	-	
Local Plan Strategic Policy	Age	Disability	Pregnancy & maternity	Race	Religion or belief	Sex	Sexual orientation & gender reassignment	Marriage & civil partnership	Comments
Policy S14: Open spaces & green infrastructure	↑	↑	↑	↑	↑	↑	↑	↑	The policy seeks to protect and enhance the City's green infrastructure network, which is expected to provide physical and mental wellbeing to all, including improved air quality, noise attenuation, access to nature, opportunities for leisure and play and enhanced public realm and townscapes. This is expected to have a positive impact across all protected characteristics, particularly sensitive receptors including those with disabilities, children and young people, old people and pregnant women.

There might be some conflict between protecting and enhancing the City's green infrastructure networks, particularly historic spaces, and improving accessibility for those with mobility issues, particularly those with a disability, older people and pregnant women. Other policies in the Plan seek to ensure the delivery of open spaces that are accessible to all. By doing so, the Plan mitigates a potential negative impact on these protected characteristics.

Overall, it is considered that the policy will provide benefits for all, particularly on sensitive receptors. |

Local Plan Strategic Policy	Age	Disability	Pregnancy & maternity	Race	Religion or belief	Sex	Sexual orientation & gender reassignment	Marriage & civil partnership	Comments
Policy S15: Climate resilience and flood risk	↑	↑	↑	↑	↑	↑	↑	↑	The policy seeks to mitigate the impacts of climate change, including minimising flood risk and overheating. Positive, non-differential impact. The policy is considered to benefit people across all equality groups.
Policy S16: Circular economy & waste	-	-	-	-	-	-	-	-	The policy protects all existing waste management sites and management processes and requires new developments to make appropriate provision for managing waste deposit and collection. The policy has no particular impacts on protected characteristics.
Policy S17-S26: Thames Policy Area + Key Areas of Change	↑	↑	↑	↑	↑	↑	↑	↑	Positive, non-differential impact. The Thames Policy Area and the seven Key Areas of Change which have been identified each have policies which seek to improve the identified area in line with policies in the Plan. A key aim for all areas will be to reduce pollution and increase greenery, which will benefit all groups.
Policy S27: Planning contributions	↑	↑	↑	↑	↑	↑	↑	↑	The policy seeks appropriate contributions from developers to manage and mitigate the impact of development. It benefits all groups as contributions may be spent on a variety of infrastructure and community projects. However, since the largest area of spending is often affordable housing, it will particularly help residents on lower incomes, who are more likely to be younger, older and from particular ethnic groups.

Chapter 6: Health Impact Assessment tables

Key Theme 1: Healthy Housing

Local Plan Strategic Policy	Healthy Design	Accessible housing		Healthy Living		Housing Mix and affordability
	Does the Plan meet all the standards for daylight, sound insulation, private space and accessible and adaptable dwellings?	Does the Plan provide accessible homes for older or disabled people?	Does the Plan ensure that every non-ground floor dwelling is accessible by a lift that can accommodate an ambulance trolley?	Does the proposal provide dwellings with adequate internal space, including sufficient storage space and separate kitchen and living spaces?	Does the proposal encourage the use of stairs by ensuring that they are well located, attractive and welcoming?	Does the proposal provide affordable family sized homes?
Policy S1: Healthy and Inclusive City	↑ (1), (2)	↑ (14)	↑ (14)	-	↑ (14)	-
S3: Housing	↑ (5, 7)	↑ (3, 8)	↑ (4, 9)	↑ (5, 10)	↑ (4, 10)	↑ (6, 11)
S8: Design	↑ (12), (13)	↑ (14)	↑ (14)	-	↑ (15)	-

(1) Buildings will be designed for all ages and disabilities for accessibility and inclusivity.
(2) Policy seeks to protect against light pollution and noise disturbance.
(3) Presumption for older person disabled accommodation.
(4) Policy encourages accessible and adaptable housing and wheelchair user dwellings.
(5) Policy seeks London Plan housing space standards and opportunities for open and leisure space which can promote active lifestyles.
(6) Presumption for a mix of affordable housing tenures in all schemes.
(7) Protects residential amenity.
(8) Policy supports older persons to remain in own homes through adaptability.
(9) Provides suitable housing to meet specific needs.
(10) Provides high quality living standards.
(11) Policy is committed to providing affordable housing in line with London Plan.
(12) Requires measures to reduce potential for light spillage.

(13) Protects daylight/sunlight to provide acceptable living standards.
(14) Promotes accessible and healthy buildings.
(15) Encourages walking and active lifestyles.

Key Theme 2: Active Travel

Local Plan Strategic Policy	Promoting walking and cycling	Safety	Connectivity	Minimising car use
	Does the Plan promote cycling and walking through measures in a travel plan, including adequate cycle parking and cycle storage?	Does the Plan include traffic management and calming measures and safe and well-lit pedestrian and cycle crossings and routes?	Does the Plan connect public realm and internal routes to local and strategic cycle and walking networks and public transport?	Does the Plan seek to minimise car use by reducing car parking provision, supported by the controlled parking zones, car free development and car clubs?
Policy S1: Healthy and Inclusive City	↑ (1)	↑ (1)	↑ (1)	↑ (1)
S2: Safe and Secure City	-	↑↓ (2), (3)	↑↓ (2), (3)	↑↓ (2, (3)
S8: Design	↑ (4), (5)	↑ (4), (5)	↑ (4), (6)	↑ (4), (5)
S9: Vehicular Transport and Servicing	↑ (7), (8)	↑ (9), (12)	↑ (10)	↑ (11), (12)
S10: Active travel and healthy streets	↑ (13), (15), (16)	↑ (14), (15), (16)	↑ (14), (15), (16)	↑ (14)

(1) Policy seeks reduction of noise, light, air, water and soil pollution which can provide more attractive walking and cycling environment.

(2) Security measures may inhibit accessibility.

(3) Also, may promote coordinated area wide measures.

(4) Increases permeability around the City which will promote walking and pedestrians.

(5) Requirement for high BREEAM scores.

(6) Supports urban greening, inclusion of trees and soft landscaping which can promote high quality public realm for walking and cycling.

(7) Aims to provide safer more attractive streets with lower pollution levels for pedestrians.
(8) Reduces car use and associated emissions with health outcomes.
(9) Transport assessments ensure transport issues are addressed to manage transport.
(10) Promotes and improves public transport.
(11) Reduces short term parking.
(12) Reducing numbers of servicing vehicles through consolidation measures.
(13) Promotion of changing facilities and cycle parking encourages active travel.
(14) Improves movement for pedestrians and cycles at expense of vehicle movement.
(15) Facilitating active travel reduces emissions from vehicles.
(16) Healthier less polluted streets encourage active travel.

Key theme 3: Healthy Environment

Local Plan Strategic Policy	Construction	Air Quality	Noise	Open Space		Play space	Biodiversity	Local Food growing	Flood risk	Overheating
	Does the Plan minimise construction impacts such as dust, noise, vibration and odours?	Does the Plan minimise air pollution caused by traffic and energy facilities?	Does the Plan minimise the impact of noise caused by traffic and commercial uses through insulation, site layout and landscaping?	Does the Plan retain or replace existing open space and in areas of deficiency, provide new open or natural space, or improve access to existing spaces?	Does the Plan set out how new open space will be managed and maintained?	Does the proposal provide a range of play spaces for children and young people?	Does the Plan contribute to nature conservation and biodiversity?	Does the Plan provide opportunities for food growing, for example by providing allotments, private and community gardens and green roofs?	Does the Plan reduce surface water flood risk through sustainable urban drainage techniques, including storing rainwater, use of permeable surfaces and green roofs?	Does the design of buildings and spaces avoid internal and external overheating, through use of passive cooling techniques and urban greening?
Policy S1: Healthy and Inclusive City	↑ (1)	↑ (2)	↑ (1)	-	-	↑ (3)	-	↑ (4)	↑ (5)	↑ (5)
S14: Open spaces and green infrastructure	↑ (6)	↑ (6)	↑ (6)	↑ (7)	↑ (7)	↑ (8)	↑ (9)	↑ (9)	↑ (9), (10)	↑ (9), (10)
S8: Design	↑ (11)	↑ (11)	↑ (11)	↑ (12)	↑ (12)	↑ (12)	↑ (12), (13))	↑ (13)	↑ (13)	↑ (13)
S15: Climate resilience and flood risk	-	-	-	↕ (14)	↕ (14)	↕ (14)	↑ (15)	-	↑ (16), (17)	↑ (18)
S16:	↕ (19), (20)	↕	↕ (19), (20), (21)	-	-	-	-	-	-	-

Circular economy and waste		(19), (20), (21)										

(1) Policy seeks to minimise disturbance from noise, vibration and light pollution.
(2) Improved air quality will support improved health outcomes.
(3) Policy seeks additional or enhanced play provision, particularly in areas where a need has been identified
(4) Text has been added which promotes food growing
(5) Prevention of land or water pollution will avoid potential harmful impacts
(6) Green roofs, urban greening can mitigate air & noise pollution affects
(7) Protection of open spaces and promotes additional open space in areas of deficiency
(8) Public access to open spaces provides equal opportunity for all.
(9) Protects and enhances open space and biodiversity, and requires urban greening (e.g. green roofs and walls) on new developments.
(10) Promotes climate resilient planting/climate mitigation insultation.
(11) Requirement for high BREEAM scores.
(12) Policy delivers improvements to open spaces.
(13) Policy supports urban greening.
(14) Incorporating climate resilience measures in spaces is beneficial but may conflict with how people use the space.
(15) Depends on design of climate resilience/flood defence measures on Thames & historic parks/ gardens (Temples) and green roofs.
(16) Policy requires use of SuDS in development, transportation and public realm proposals.
(17) SuDs Flood protection improves water quality – reduces sewer flooding.
(18) Policy promotes various design measures to reduce overheating and Urban Heat Island effect.
(19) Could result in noise or air pollution from recycling/deconstruction on site if not sensitively managed.
(20) Waste and resources planning provide environment for responsible businesses to thrive.
(21) Space for waste reduces space for other uses but waste management on site or in the City eliminates need for transfer.

Key theme 4: Vibrant neighbourhoods

Local Plan Strategic Policy	Health Services	Education	Access to social infrastructure		Local Employment and healthy workplaces		Access to local food shops		Public realm	
	Has the impact on healthcare services been addressed?	Has the impact on primary, secondary and post-19 education been addressed?	Does the Plan contribute to new social infrastructure provision that is accessible, affordable and timely?	Have opportunities for multi-use and the co-location of services been explored?	Does the Plan include commercial uses and provide opportunities for local employment and training, including temporary construction and permanent 'end-use' jobs?	Does the Plan promote the health and wellbeing of future employees by achieving BREEAM health and wellbeing credits?	Does the Plan provide opportunities for local food shops?	Does the proposal avoid an over concentration or clustering of hot food takeaways in the local area?	Does the design of the public realm maximise opportunities or social interaction and connect the proposal with neighbouring communities?	Does the Plan allow people with mobility problems or a disability to access buildings and places?
Policy S1: Healthy and Inclusive City	↑ (1)	↑ (2)	↑ (3)	↑ (3) (4)	↑ (5)	↑ (6)	↑ (5)	-	↑ (6)	↑ (6)
S2: Safe and Secure City	↑ (7)	-	-	-	-	-	-	-	↕ (8), (9), (10)	↕ (8), (9), (10)
S4: Offices	↕ (11)	-	-	-	↑ (11)	-	-	-	↕ (12)	↑ (13)
S5: Retailing	-	-	-	-	↑ (14)	-	↑ (15)	↕ 16)	↑ (17)	↑ (17)
S8: Design	-	-	-	-	-	↑ (18)	-	-	↑ (19)	↑ (19)

(1) Policy encourages further provision of health facilities and the use of conditions to ensure their retention. There are no specific proposals for new health care facilities in the Plan.

(2) Residents, workers and students will benefit from healthier and inclusive buildings, open spaces with recreational facilities and public realm, particularly schools and nurseries. There are no specific proposals for new education facilities in the Plan.

(3) The Plan seeks to work in partnership with neighbouring boroughs to deliver educational and health facilities due to the City's low residential population.

(4) The Plan supports multi-use of existing facilities such as libraries and community centres in the City.

(5) The Plan promotes opportunities for training and skills development to improve access to employment, and developer contributions are collected for this purpose

(6) Plan requires use of BREEAM and promotes standards that measure health and well-being in buildings.

(5) HIA submitted with major applications will consider healthy food outlets.

(6) Policy promotes healthier and inclusive spaces, which will encourage greater usage and therefore more mixing of people.

(7) Contributes towards stress reduction.

(8) Policy provides safe social spaces.

(9) Policy encourages a mix of uses which can encourage natural surveillance and design out crime.

(10) Security measures may inhibit accessibility.

(11) The policy will increase/retain office floorspace and therefore jobs in the City. Beneficial employment brings health benefits, but large workforce puts pressure on services.

(12) Increased pressure on public realm.

(13) Policy promotes free public access to major office developments in tall buildings to increase social and economic inclusivity

(14) Retail contributes to the City's visitor economy and provides employment.

(15) Policy seeks to retain convenience food stores in residential areas.

(16) Policy encourages specialist retail uses and markets including temporary food markets. There is no specific policy to prevent clustering of hot food takeaways.

(17) Policy supports retail uses that provide active frontage and vitality to public realm would improve walking routes and convenient retail provision.

(18) Requirement for high BREEAM scores.

(19) Policy promotes accessible buildings and public realm, and new walking routes to improve permeability/reduce congestion on pavements.