

CITY PLAN 2019 – 2040

**EQUALITIES IMPACT ASSESSMENT
ADDENDUM TO THE INTEGRATED
IMPACT ASSESSMENT**

NOVEMBER 2019

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1 Introduction

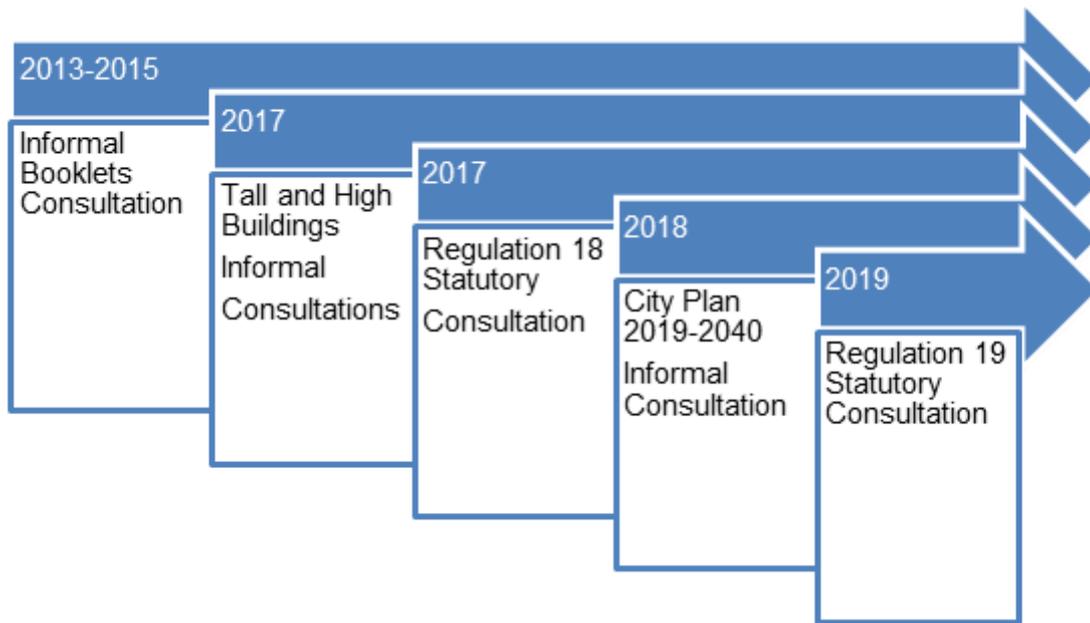
This document sets out the Equalities Impact Assessment (EqIA) for the Westminster City Plan 2019-2040, which was carried out as part of the Integrated Impact Assessment (IIA) of the City Plan. This document has been prepared to provide clarity of the EqIA assessment process that has accompanied and informed the making of the draft City Plan and the IIA.

The Public Sector Equality Duty requires public bodies to have due regard for the need to eliminate discrimination, advance equality of opportunity, and foster good relations between different people when carrying out their activities. The purpose of the EqIA is to consider the likely impact of the draft City Plan 2019-2040 on the protected characteristics defined by the Equalities Act 2010, and where required, taking proportionate action to improve or mitigate potential impacts of the policies.

2 Background to the Equalities Impact Assessment (EqIA)

Details of the project that is being assessed: draft City Plan 2019-2040

Westminster City Council is preparing a new City Plan which sets out the council's vision for the City of Westminster for the period 2019-2040. This full revision of the City Plan updates the strategic planning policies in the current City Plan (2016) and fully replaces saved policies from the Unitary Development Plan (2007). It takes account of several years of engagement and consultation with the purpose to update Westminster's planning policies.



After the examination in public and upon formal adoption, the City Plan 2019-2040 will form Westminster's principal planning policy document. It will be used to determine planning applications in the city and will guide development across the city over the long term.

How many people will be affected by the City Plan, and from what sections of the community?

The impact of the City Plan is city wide. It will have an impact on everyone who lives, works, or visits Westminster. This includes businesses, local services, communities, land owners and developers.

Scoping of EqIA

The equality duty is a continuing duty and consideration of equality impacts will continue at each relevant stage in the preparation and publication of the emerging Local Plan. The expected timetable for the consultation and adoption of City Plan 2019-2040 is set out below:

- Notification of the intent to prepare the revision (Regulation 18) – [June - July 2017 - complete]
- Informal consultation on Draft Plan – [November – December 2018 - complete]
- Formal Regulation 19 consultation on the Submission Draft Plan – [June – July 2019 - complete]
- Submission to the Secretary of State – [Autumn 2019]
- Examination by Independent Inspector – [Winter 2019/20]
- Inspector’s Report – [Spring 2020]
- Adoption – [Spring 2020]

3 The council's Equality Duty

“The aim of the Public Sector Equality Duty (as of other equality duties) is to bring equality issues into the main-stream, so that they become an essential element in public decision making” (London Borough of Hackney v Haque [2017]).

Under the Equalities Act 2010 the council has a “Public Sector Equality Duty”. This means that in taking decisions and carrying out its functions it must have due regard to the need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the 2010 Act;

- to advance equality of opportunity between persons who share a relevant protected characteristic (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation) and those who do not share it; and to
- foster good relations between persons who share a relevant protected characteristic and those who do not share it.

The council is also required to have due regard to the need to take steps to take account of disabled persons' disabilities even where that involves more favourable treatment; to promote more positive attitudes toward disabled persons; and to encourage participation by disabled persons in public life. The 2010 Act states that “having due regard” to the need to promote equality of opportunity involves in particular having regard to:

- the need to remove or minimise disadvantages suffered by persons sharing a protected characteristic;
- take steps to meet the needs of persons sharing a protected characteristic that are connected with it;
- take steps to meet the needs of persons who share a protected characteristic that are different from those who do not; and
- encourage persons with a protected characteristic to participate in public life or any other activity in which participation by such persons is disproportionately low.

The courts have held that “due regard” in this context requires an analysis of the issue under consideration with the specific requirements set out above in mind. It does not require that considerations raised in the analysis should be decisive; it is for the decision-maker to decide what weight should be given to the equalities implications of the decision.

The council must therefore consider whether or not there is potential for the draft Westminster City Plan 2019-2040 to result in a less favourable outcome on any group with a protected characteristic including:

- gender;
- race or ethnicity (including refugees, asylum seekers, migrants, gypsies and travellers);

- disability (consider different types of physical, learning or mental disabilities);
- sexual orientation/s;
- age (particularly children, under 21s and over 65s);
- gender re-assignment;
- pregnancy and maternity;
- religion or belief;
- marriage and/or civil partnership; and
- people on low incomes (this category is not included in the 2010 Act but is a characteristic the Council wished to consider).

The equalities implications of the policies in the draft Westminster City Plan 2019-2040 have been assessed as part of the Integrated Impact Assessment (IIA) which has been carried out since 2017 and has iteratively informed and guided policy development. While equalities considerations have formed part of the IIA Assessment Framework, the detailed findings of the EqIA are set out in this document to provide more clarity of the assessment the council carried out leading up to the publication of the Regulation 19 Publication version of the City Plan.

4 Approach to EqIA

The Equality Impacts Assessment (EqIA) for the draft City Plan 2019-2040 was carried out as part of the Integrated Impact Assessment (IIA) of the draft City Plan.

The IIA has considered the likely impacts of the draft City Plan using a series of objectives that reflect the current social, economic and environmental issues affecting Westminster. These objectives are presented in the IIA Framework¹. Detailed appraisal questions have been developed for each objective to help the assessment. IIA objectives and appraisal questions together form the IIA Assessment Framework.

The scoping of the IIA Framework was consulted upon in 2017 and the full IIA Framework subject to statutory consultation alongside the Regulation 19 publication draft consultation of the City Plan in 2019. The IIA Framework has been updated and refined in light of comments received, including the objectives and appraisal questions. The IIA Framework takes account of specific priority objectives from the council's Equality Objectives 2016-2020 and potential impacts on persons sharing one or more of the protected characteristics. The questions that relate to equalities issues are highlighted in red (or with a red asterisk) in the IIA Framework. Annex V of the IIA provides further background to the IIA objectives.

This document has been prepared to provide clarity of the EqIA assessment process that has accompanied and informed the making of the draft City Plan and the IIA. It pulls together baseline data on the protected characteristics that are considered as part of the EqIA and for each of these sets out any identified likely impact of the proposed City Plan Policies which could have a more pronounced effect on people with protected characteristics. These are referred to as "differential impacts" and could be positive or negative. These are set out in Section 6, which presents the detailed results of the EqIA Screening for each of the proposed City Plan policies. When a differential likely negative impact has been identified, the report sets out any mitigation measures that have been taken.

4.1 Main sources used to inform the EqIA

The City Plan has been produced following extensive consultation and public participation, which takes into account the views and representations expressed by different community groups, statutory and non-statutory bodies. The Equality Impact Assessment which builds on the iterative IIA process that has been carried out since 2017 examines whether the proposed draft City Plan will have any undue impacts on any specific equality groups within Westminster.

The publication version of the City Plan is informed by the previous consultation stages and by evidence studies. In terms of the consultation, all consultees including organizations and individuals on the council's Planning Policy Consultation Database

¹ See Integrated Impact Assessment, section 1.4, Table 1.

were emailed directly and notified of consultations. This includes a number of groups, organisations and networks that represent or support people from protected characteristics. A dedicated City Plan web page with information on the consultation was made available on the council's website. Hard copies of the draft City Plan, the IIA and the consultation form were made available at all Westminster libraries and at reception at City Hall. The process for consultation is set out in full in the Consultation Statements.

Other sources of information used to prepare the IIA and EqIA are the following:

- City Profile and Ward Profiles 2018² (including Census and ONS population; data and first-hand data from Council services);
- City Survey 2018 – Annual resident survey;
- Equality Objectives Evidence Base 2015;
- Planning applications statistics;
- Housing monitoring;
- Social and Intermediate Housing Registers; and
- Commercial monitoring.

4.2 Monitoring

The policies contained in the City Plan will be monitored through the annual Authority Monitoring Report (AMR) using a range of indicators to assess whether the objectives of the plan are being delivered. The monitoring framework has been informed by the findings of the Integrated Impact Assessment (which includes the Equalities Impact Assessment).

² <https://www.westminster.gov.uk/ward-profiles>

5 Westminster's equality profile, characteristics and key issues

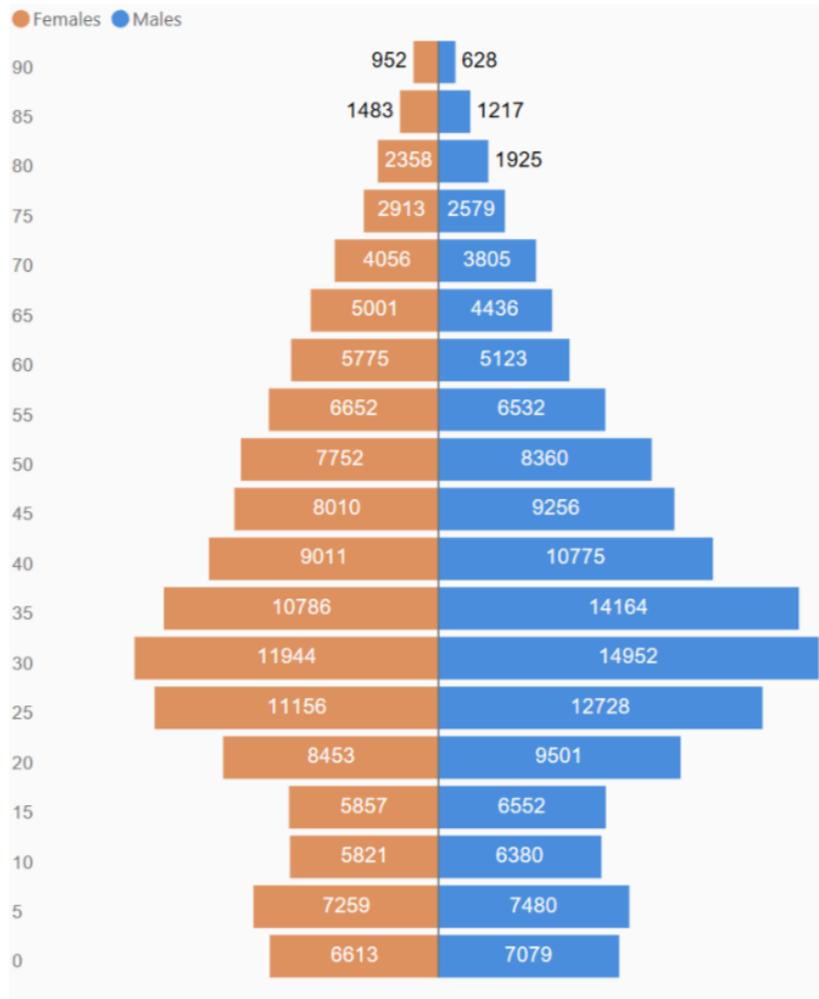
5.1 Equalities profile

The council produced an Equalities Objectives Evidence Base in 2015, which has been used as a baseline for this assessment alongside other relevant information sources as set out in Section 3 'Approach to EqIA'. This section presents headline figures with regards to the protected characteristics defined by the Equalities Act 2010.

Population, age and gender

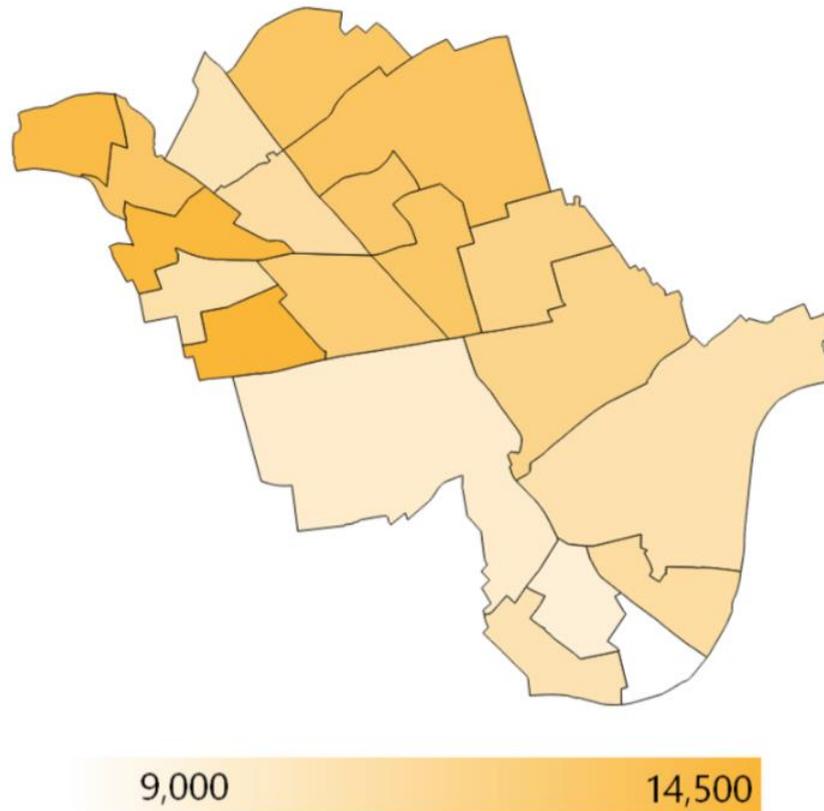
As of 2018, mid-year estimates were that there are 255,324 people living in the City of Westminster, 133,472 males and 121,852 females. As the chart shows, there are more working age people living in Westminster (particularly in the 25-29, 30-34 and 35-39 age groups) than children, young adults or older people.

Figure 1. Population (Source: Westminster City Council Mid-Year Estimates, 2018)



The highest population densities are found in Queen’s Park, Harrow Road, Westbourne and Lancaster Gate. These first three wards are covered by the North West Economic Development Area (NWEDA) spatial designation set out by the City Plan.

Figure 2. Population density (Source: Westminster City Council, 2018)

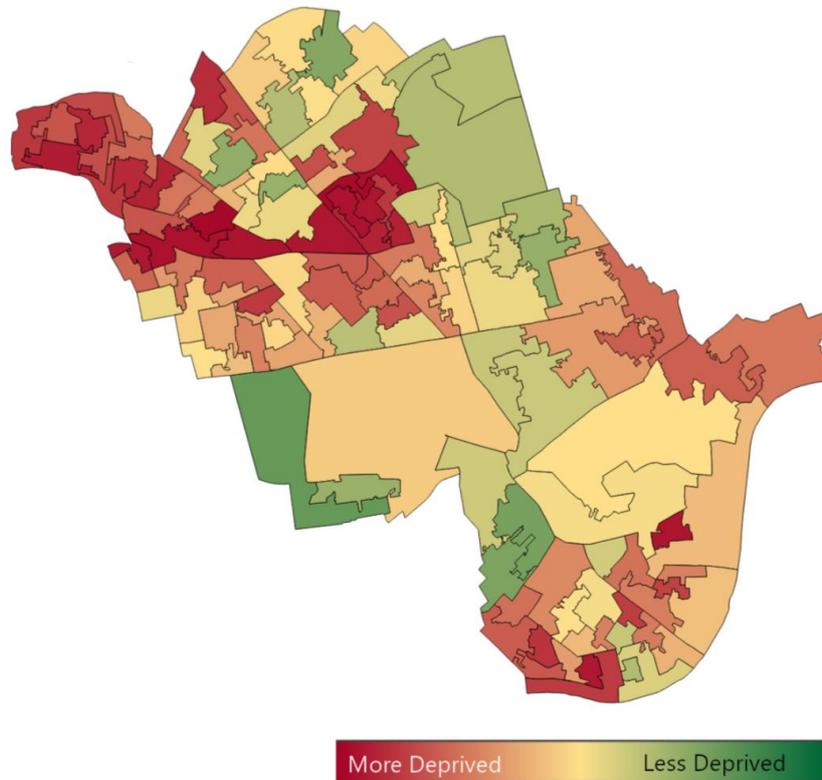


The churn rate in Westminster continues to be extremely high. Around 27% of people arrived or left the city in a single year from 2016/17.

Deprivation

Westminster's local areas are among both the most and least deprived in London according to the 2015 Index of Multiple Deprivation (IMD). Westminster is within the 30-40% most deprived boroughs in the UK for the average overall rank. The most deprived wards are Church Street, Queen's Park, Harrow Road, Westbourne and Churchill.

Figure 3. Index of Multiple Deprivation (Composite Rank)(Source: DCLG 2015)



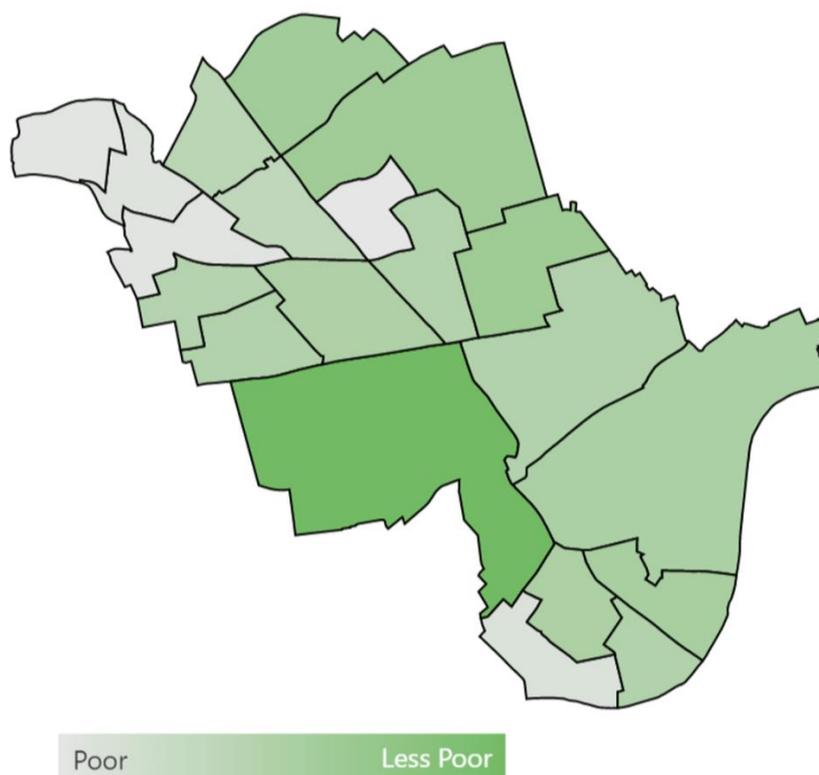
Health and wellbeing

The ONS Report General Health 2011 found the majority of Westminster’s residents (54%) to be in very good health, 30% in good health, 10% in fair health, and 4% in bad health.

The GLA Well-Being Index³ ranked Westminster first out of the 32 London boroughs, indicating the probability residents experience greater wellbeing is the highest in London. However, a number of wards score poorly on wellbeing. These are Queen’s Park, Harrow Road, Westbourne, Church Street and Churchill.

³ The GLA Well-Being Index is a score based on a combined measure of 12 wellbeing indicators related to health, economic security, safety education, mobility and environment.

Figure 4. Wards Well-Being Score (Source: GLA Intelligence Unit, 2013)



In 2010, 25% of year 6 children were classified as obese. This was more prominent in the Queen’s Park, Harrow Road, Westbourne, Church Street and Churchill wards.

Disability

It is estimated that the number of disabled persons in Westminster is as set out in Figure 5.

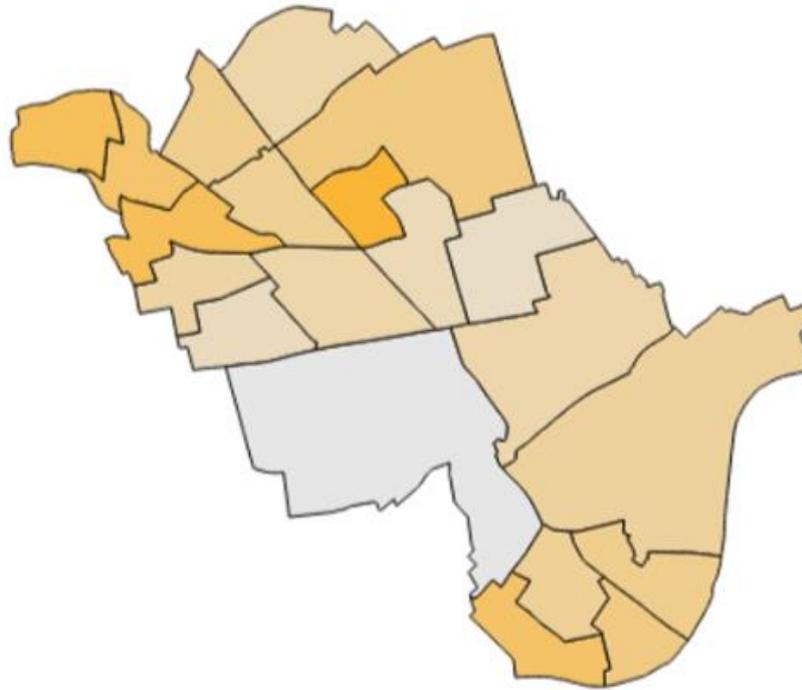
Figure 5. People with disabilities (Source: PANSI, 2015 www.pansi.org.uk)

	Number	% (of 18-64 year olds)
People aged 18-64 estimated to have a moderate or serious physical disability	14,286	9%
People aged 18-64 estimated to have a common mental disorder	26,457	16%
People aged 18-64 estimated to have a learning disability	4,068	2%

According to the 2011 Census, 14% of the city’s population were affected by long-term illness or disability. In 2017, 930 residents in Westminster received disability benefits. There were 3,445 residents who received social care from the council. 22% of families were composed of lone parents with dependent children in Westminster.

23% of children were receiving free school meals in 2017, an indicator of the proportion of financially stressed families.

Figure 6. Long-term illness or disability (Source: ONS, 2011)

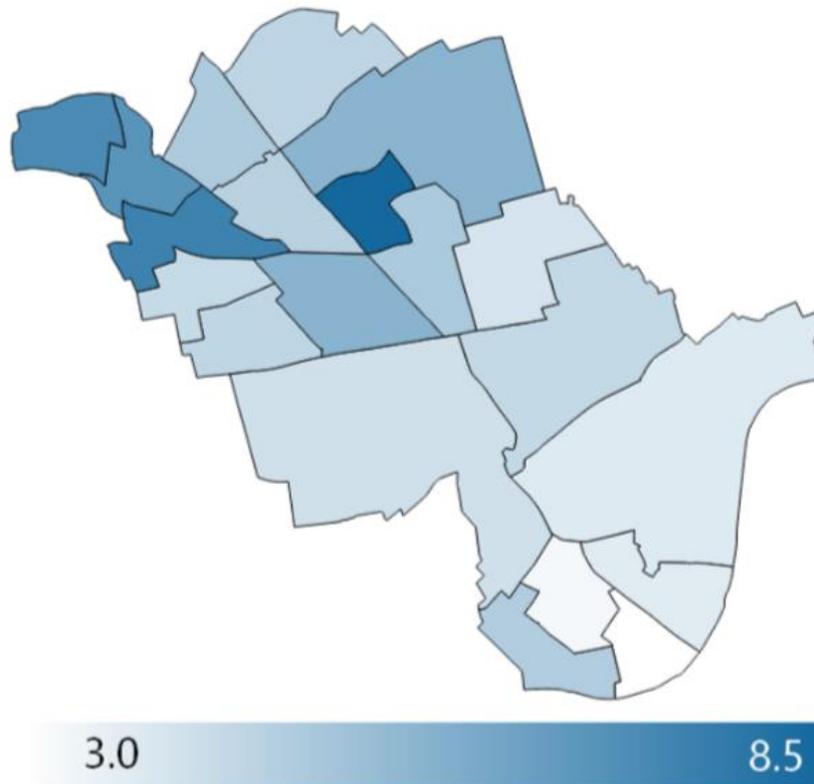


Ethnicity

Westminster's population is more ethnically diverse than most other London boroughs. Westminster is ranked as the ninth most diverse in London, and tenth out of 455 Local Authorities in England and Wales according to its Simpson Diversity Index Score⁴ (ONS 2012). The SDI of Westminster was 5, compared to London's which was 2.7. The most ethnically diverse wards were Church Street, Queen's Park, Harrow Road and Westbourne.

⁴ Simpson Diversity Index (SDI) scores the ethnic diversity of an area's population. The minimum value is 1 which indicates the population is made up of one ethnic group, whilst the maximum value is the total number of ethnic categories included (18 in the 2011 Census).

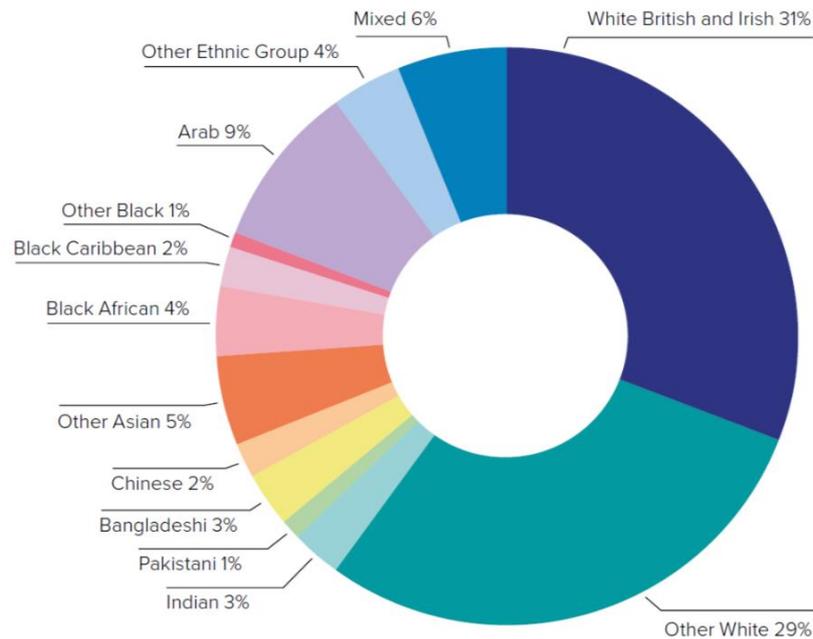
Figure 7. Westminster's ethnic diversity by ward (Source: Simpson's Diversity Score, ONS 2011 projections)



According to GLA projections, 60% of Westminster's population is White British and Irish or Other White, while the remaining 40% is from a different ethnic background. The largest ethnic group is Arab, followed by Mixed and Other Asian.

Westminster has proportionally more Other White people (21%) than London (11%). 28% of Westminster's population is of BAME ethnicity, which compares to the London average of 30%.

Figure 8. Westminster’s ethnic mix. Source: GLA 2016-based ethnic group projections

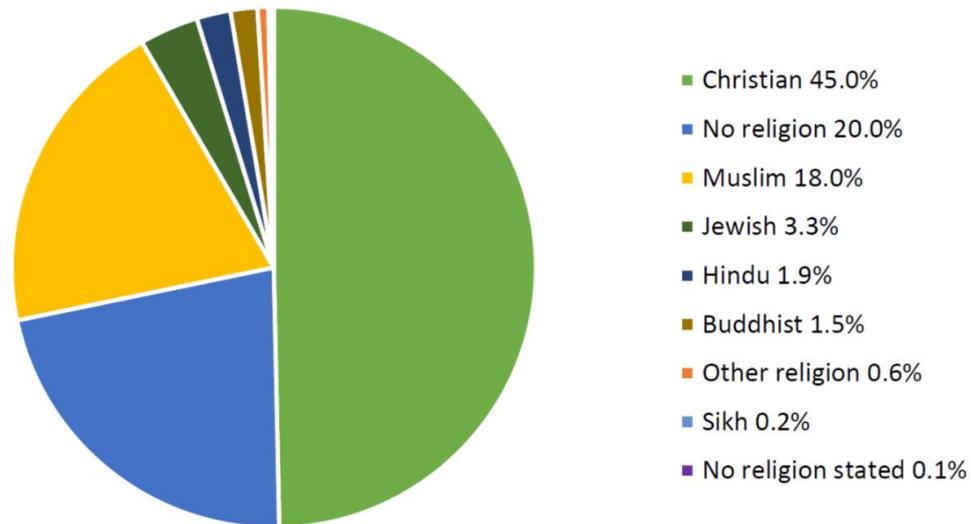


In 2011, English was being spoken in 64% of households in Westminster. 47% of the residents were born outside of the UK. Of the residents who were born outside of the UK, 32% have lived in the UK for 5 years or less according to the 2017 City Survey. Of those registered on the electoral roll, 18% of Westminster are from the EU and 6% are from Commonwealth nations. Italy is the most prevalent country of origin outside of Britain according to the 2017 electoral roll.

Religion

The two largest religions in Westminster are Christian (45%) and Muslim (18%), followed by no religion (20%).

Figure 9. Religions. Source: Census, ONS, 2011



Sexual Orientation and Gender Reassignment

Although it is not possible to know the exact figures for LGBT people who live in Westminster, it is estimated that up to 10% of Westminster’s population identify as being lesbian, gay or bisexual⁵. Similarly, there is no reliable estimate of the number of persons proposing to undergo, is undergoing or has undergone gender reassignment.

There are LGBT people who are young and old, disabled and from different faiths and ethnicities who live and work in the city and use the services that the Council provides. A report from GALOP reminds us ‘[t]he movement for lesbian, gay, bisexual and trans equality is often thought of as separate to struggles for race, gender, disability, age, class or faith equality. [...] However, that ignores the fact that LGBT people exist within every community, identity group, faith and background; and that people from all those groups exist within LGBT communities. Many people with intersectional identities live happy and fulfilled lives but the fact remains that many face heightened discrimination and exclusion.’⁶

Pregnancy and maternity

The General Fertility Rate (GFR) is the number of live births per 1,000 women aged 15-44. The GFRs have been calculated using the 2012 mid-year population estimates. The Total Fertility Rate (TFR) is the average number of live children that a

⁵ Gold, D & Cowan, K. (2009) Mapping LGBT Westminster: Investigating the needs and experiences of LGBT people in Westminster – A report commissioned by Westminster City Council, GALOP

⁶ Antjoule, N. (2014) LGBT Intersections – A Charity Perspective, GALOP

group of women would bear if they experienced the age-specific fertility rates of the calendar year in question throughout their childbearing lifespan.

Fertility rate in Westminster is lower than England and Wales overall, and is reflective of the relatively low number of children and young people living in the borough compared to other boroughs.

Figure 10. Births and fertility rates (Source: ONS, 2014)

	Live births	General fertility rates	Total fertility rates
Westminster	2,677	48.3	1.25
England and Wales	-	-	1.94

Marriage and civil partnership

The Westminster Register Office shows that the total number of weddings and civil partnership recorded in 2014.

Figure 11. Weddings and Civil Partnerships in Westminster (Source: Westminster Register Office, ONS, 2014)

Total weddings	Female Civil Partnerships	Male Civil Partnerships	Total Civil Partnerships
2,226	48	176	224

The 2011 Census asked about people in civil partnerships. The Census shows that there were 1,539 people in registered civil partnerships in Westminster – which accounted for 6% of all people living in same-sex couples in London, and 2% of all people living in same-sex couples in England.

5.2 Key issues affecting people living in Westminster

A full scoping report was carried out as part of the Integrated Impact Assessment (IIA). Figure 12 highlights key findings from the IIA Scoping report and from the Council's Equality Objectives Evidence Base that are relevant for the purpose of the Equality Impacts Assessment.

Figure 12. Summary of key issues and characteristics

<p><u>Westminster's Residents</u></p>	<ul style="list-style-type: none"> • Single adults make up the largest proportion of households, but there are many families too. • Ageing population, in line with the rest of England, but also an increased number of children. This will put pressure on specialist housing and appropriate social services/infrastructure. • An increasingly international and ethnically diverse population. Main country of birth: EU, Middle East, North America. • High rate of international migration. • Very transient population: more short-term migrants than any other local authorities in England. • Christianity is the largest religion, Islam the second. • Estimated significant LGBT resident population. • Non-white ethnic groups have a disproportionately high number of looked after children in relation to population size. • Pupils of black ethnicity achieving fewer top GCSE grades than pupils of white ethnicity. • 5% of the population either cannot speak English well or cannot speak English at all.
<p><u>Health and wellbeing</u></p>	<ul style="list-style-type: none"> • Deprivation is mainly confined in the NWEDA, Church Street and small pockets within the south of Westminster, with considerable numbers of children living in poverty. • Adult obesity rate lower than London average, but likely to be almost double in deprived areas. Obesity rate in primary school children higher than London Average. • Over half of Westminster's residents are educated at least to degree level, and over two thirds educated to A-level and beyond. • Black ethnic groups most likely to claim Job Seeker's Allowance. • Westminster has the second highest life expectancy rate in London for both males and females. • People supported by adult social care are overwhelmingly from the white ethnic group.
<p><u>NWEDA</u></p>	<ul style="list-style-type: none"> • Disparity between this area and rest of Westminster. • Primarily residential area with a high proportion of social rented housing.

	<ul style="list-style-type: none"> • Marked by a high level of deprivation and health inequalities. • Average rent for small sized offices considerably below the Westminster average. • Average rent for a 2-bedroom flat is £438 (roughly two thirds of the average for the whole of Westminster)
<p><u>Westminster's Housing</u></p>	<ul style="list-style-type: none"> • Westminster's private residential market attracts interest from global investors. • Average house prices the second highest in the country, 24 times the average Westminster household income. • Housing tenure is 39.7% privately rented, 30.5% owned outright, 25.9% public rented, 0.8% shared ownership. • There is a balanced demand for all sizes of units in the private market (34% one bed, 36% two bed and 30% family sized units). • It is estimated that 44% of the affordable homes required annually are social and 56% are 'intermediate' (the latter catering for people who do not qualify for social housing but cannot afford market housing). • High population churn, with 25% moving out of Westminster between 2016/17 • 12% of homes have no full-time resident, compared with 3.6% of England. 7% of Westminster's residents own a second home elsewhere. • Some 40% of over 65-year-old live alone. • The council's older people/disability services support a significant number of people (4,480) in the community. • Contrary to many other local authorities, in Westminster higher levels of older residents rent privately rather than owning a property. Nearly a third of over 85 year old residents are in the private rented sector. • Ongoing overcrowding problem mainly focused in the north-west of Westminster. Those parts of Westminster with the highest concentration of social housing and overcrowding are also those which suffer from deprivation. • 20% of all private rented homes are HMOs. There are around 2,900 purpose-built student rooms and between 1,300 and 3,000 properties privately rented to students. • Around half of the 2,700 homeless households currently in temporary accommodation live outside Westminster • The majority of people sleeping rough are of white British and other white ethnic groups and were most likely to be aged 36-45 years old. • No identified need for provision of gypsy and traveller accommodation.

<p><u>Economic conditions</u></p>	<ul style="list-style-type: none"> • Jobs overwhelmingly located in the centre of Westminster • Majority of small businesses but also a number of multi-national corporations, particularly in the Opportunity Areas • A diverse economy in terms of sectors and range of occupations offered • Offices are the second largest land use in Westminster and are mostly located in the CAZ. Decline of office floorspace in the past years. • The West End is recognised as the fifth most expensive office market in the world. • Westminster is at the heart of the creative sector and normally operates from B1 office floorspace. There is a cluster of such uses in Soho. • Government, state and monarchy functions generate employment and act as tourist attractions. • Higher education is a major employer. This includes universities, language schools and arts related colleges. • The Pakistani and Bangladeshi ethnic groups have the lowest employment rates. • Females from minority ethnic groups have considerably lower employment rates.
<p><u>Retail</u></p>	<ul style="list-style-type: none"> • Westminster’s town centre network caters for a diverse range of needs and markets. • Local centres provide access to convenience shopping to local residents.
<p><u>Arts, culture, tourism, entertainment, food and drink</u></p>	<ul style="list-style-type: none"> • A vast tourist and visitor economy but also a large number of workers coming into Westminster every day. • Westminster’s ENTE is the largest in the UK. This can be associated with negative impacts on amenity, air quality and crime. • Large incoming numbers put pressure on existing infrastructure, local services, transport and the public realm. • Due to its functions and high volume of people, Westminster can be particularly subject to particular security risks and concerns in relation to terrorism. • Both Anti-Semitic and Islamophobic hate crime has increased in Westminster between June 2014 and June 2015.
<p><u>Growth and future development</u></p>	<ul style="list-style-type: none"> • Space is at a premium, most growth to be achieved by smaller schemes including redevelopment and extension to existing properties. • Working population to increase however uncertainties around EU nationals and Brexit. • Businesses and organisations have changing expectations about the types of workspace they occupy.

<u>Heritage</u>	<ul style="list-style-type: none"> • Unique built and cultural heritage. Over 11,000 listed buildings and structures • Over three quarters of the city falling within conservation areas. • One UNESCO World Heritage Site, which is at risk of inclusion in the list of endangered sites. • Three scheduled ancient monuments • A legacy of good quality accessible and secure streets but need frequent management.
<u>Green infrastructure and open space</u>	<ul style="list-style-type: none"> • Expansive green network but shortage of open space, with some neighbourhood being deficient in open space and access to play space for children. • Only 65% of Westminster's open space offers free access to the public
<u>Air Quality</u>	<ul style="list-style-type: none"> • Poor air quality, due to complex urban environment. Parts of Westminster have some of the worst air quality levels in the country. • Growing population could lead to higher numbers of people exposed to poor air quality, resulting in significant health service implications.
<u>Flooding</u>	<ul style="list-style-type: none"> • Subject to flood risk, particularly from surface water flooding.
<u>Water</u>	<ul style="list-style-type: none"> • Water stressed area. Water consumption significantly higher than average for England and Wales.
<u>Carbon and greenhouse gas emissions</u>	<ul style="list-style-type: none"> • Westminster has some of the highest carbon emissions of any local authority in the UK due to its built up nature and 24 hour activity. • Unlike other parts of the country, Westminster's carbon footprint not linked to large scale industrial activity but rather cumulative impact of smaller occupiers, with approximately 75% of emissions from commercial occupiers, 15% from domestic users and 10% from transportation.
<u>Heat and power networks</u>	<ul style="list-style-type: none"> • Existing District Heating Undertakings provide opportunities for efficient energy supply and carbon reduction.
<u>Noise</u>	<ul style="list-style-type: none"> • Westminster's noise levels exceed WHO guidelines and are unlikely to decrease without direct intervention. • Road traffic the main source of noise, however most complaints received in 2016/17 were about noise from residential premises.
<u>Waste</u>	<ul style="list-style-type: none"> • One of the lowest household recycling and composting rates in London, reflecting high proportion of households (over 90%) living in flats. • Construction sector the largest source of waste in London. • Street cleaning and commercial services make up 60% of the municipal waste stream. • Lack of available sites to meet waste apportionments.
<u>Transportation and pedestrians</u>	<ul style="list-style-type: none"> • Competing demands for the use of highway space.

	<ul style="list-style-type: none">• Freight and servicing making up a quarter of central London weekday traffic.• High level of public transport accessibility across Westminster.• Modal share of journeys originating in Westminster is: 40% walk, 23% underground, 13% bus, 7% rail, 21% car or motorcycle, 4% taxi and 3% cycle.• Number of people participating in active travel in Westminster is high, with percentage of people cycling to work higher than greater London average.• Car use by Westminster residents is 25% below the average for greater London and is the lowest rate in London.• Car ownership fallen from 63% to 56% between 2001 and 2011.
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6. Results of Equality Impact Assessment Screening

Scale of effect	Definition
++	Major positive The draft policy has a likely major positive impact on the protected characteristic.
+	Minor positive The draft policy has a likely minor positive impact on the protected characteristic.
N	Neutral The draft policy does not have a likely differential impact on the protected characteristic (but might have a likely positive impact across protected characteristics).
-	Minor negative The draft policy has a likely minor negative impact on the protected characteristic.
--	Major negative The draft policy has a likely major negative impact on the protected characteristic.

Impact of draft Westminster City Plan 2019-2040 policies on Equalities Categories

Policy	Equalities categories									Comment
	Gender	Race	Disability	Sexual Orientation	Age	Pregnancy and Maternity	Religion or belief	Marriage and/or Civil Partnership	People on low incomes	
Spatial Strategy										
1. Westminster's spatial strategy	N	N	++	+	++	+	N	N	++	<p>The policy promotes a balanced mix of uses including shops and facilities, cluster of uses, and supports town centres and high streets, contributing to improved access to local services and facilities, engagement in community activity and inclusive communities.</p> <p>Given Westminster's more ethnically diverse population, targeting by area-specific policies (namely Policy 5 and Policy 6), these people are more likely to positively benefit from the delivery of policy ambitions for these areas, including increased job opportunities, additional floorspace for smaller businesses, new social and community infrastructure.</p> <p>Intensification, higher quality new developments, improved access to local services and facilities through protection of town centres and high streets and enhancement to the public realm are likely to have a differential positive impact on those with mobility issues, including those with disabilities, older people and pregnant women. This also contributes to reducing the need to travel further to access services and facilities, which is also likely to have a differential positive impact on people on low incomes.</p> <p>Proximity and improved access to services and facilities is also likely to contribute to enhanced engagement in community activity, particularly for older people who are more at risk of isolation, and to improve inclusiveness towards people with disabilities and different sexual orientations.</p>
2. Spatial Development Priorities: West End Retail and Leisure Special Policy Area and Tottenham Court Road Opportunity Area	++	N	++	++	++	++	++	N	+	<p>Support for the diversification of the evening and night-time economy is likely to have a positive differential impact on women, those with disabilities, LGBTQI+ people, younger and older people, people of different faith and beliefs, pregnant women and those with babies with regards to improved safety and perception of safety, wider range of activities that are not necessarily focussed on consuming alcohol. People on low incomes are also likely to benefit as a wider range of activities can help making the ENTE more inclusive towards people with a range of budgets.</p>
3. Spatial Development	N	++	++	N	++	++	N	N	++	<p>Provision for enhanced community facilities for residents of Paddington and neighbouring areas is likely to particularly benefit people from specific ethnic groups</p>

Priorities: Paddington Opportunity Area										<p>who are more present in this part of the city. Further local provision is also likely to benefit those with mobility issues, including those with disabilities, older people and pregnant women. This also contributes to reducing the need to travel further to access services and facilities, which is also likely to have a differential positive impact on people on low incomes.</p> <p>The policy also contributes to the delivery of a significant number of new high-quality homes across all tenures, including affordable housing. This is likely to have a differential positive impact on people on low incomes, young people and particular ethnic groups who are overrepresented and have greater priority for social housing,</p>
4. Spatial Development Priorities: Victoria Opportunity Area	N	++	++	N	++	++	N	N	++	<p>Support for the provision and enhancement of social and community facilities, which includes libraries, facilities for children and young people and improved sports and leisure facilities are likely to have a differential positive impact on children, younger residents and those with learning disabilities, as well as those with mobility issues that might benefit from shorter journeys (including pregnant women and those with babies, those with disabilities and older people).</p> <p>It also contributes to the delivery of a significant number of new high-quality homes across all tenures, including affordable housing. This is likely to have a differential positive impact on people on low incomes, young people and particular ethnic groups who are overrepresented and have greater priority for social housing,</p>
5. Spatial Development Priorities: North West Economic Development Area	N	++	++	N	++	++	N	N	++	<p>Investment in new social and community infrastructure and facilities for local communities in the NWEDA as part of its regeneration and renewal, contributing to improved access to shops and facilities. This is likely to have a differential positive impact on children, younger residents and those with learning disabilities, as well as those with mobility issues that might benefit from shorter journeys (including pregnant women and those with babies, those with disabilities and older people).</p> <p>Setting new residential and mixed-use developments that improve housing quality and help diversify the area's tenure mix is likely to particularly benefit people on low incomes, young people and particular ethnic groups who are overrepresented and have greater priority for social housing.</p> <p>Addressing the issue of severance in the area, promoting a more walkable environment and opportunities for greater use of the Grand Union Canal, contributes to local wellbeing through improved open spaces and enhanced access and movement in the wider area. This is considered to benefit everyone across all protected groups.</p> <p>Prioritising increased job opportunities for local residents through the protection and provision of a range of new employment floorspace, promoting equality of opportunity across the city and contributing to reducing unemployment is likely to particularly benefit young people and people on low incomes, but also particular ethnic groups that have a higher presence in this area.</p> <p>Given some ethnic groups are overrepresented in this part of Westminster, the policy is considered to have a differential positive impact on this protected characteristic.</p>
6. Spatial Development Priorities: Church Street/ Edgware Road and Ebury Bridge Estate Housing Renewal Areas	N	++	++	N	++	++	N	N	++	<p>The policy contributes to the delivery of a significant number of new high-quality homes, particularly affordable housing. This is likely to have a differential positive impact on people on low incomes, young people and particular ethnic groups who are overrepresented and have greater priority for social housing.</p> <p>It also prioritises public realm improvements, and new and enhanced community facilities. This contributes to enhanced accessibility and access to local services, shops and facilities, which is likely to have a differential positive impact on children and younger residents, as well as those with mobility issues that might benefit from shorter journeys (including pregnant women and those with babies, those with disabilities and older people).</p>

										<p>It also recognises the potential to attract new business and workspaces around Edgware Road and Marylebone Stations, with the capacity for at least 350 new jobs and opportunities to link employment opportunities in the CAZ to local communities. This contributes to promoting equality of opportunity across the city and potentially reducing unemployment. This is considered to benefit people across all equality groups.</p> <p>Each renewal area is subject to their individual EqIA. The council has also developed policies in relations to tenants and leaseholders that need to move home during the renewal works, which are also subject to detailed EqIAs.</p>
7. Managing development for Westminster's people	N	N	++	N	++	++	N	N	N	<p>The policy protects the amenity of residents from unacceptable impacts from development. This is likely to benefit all protected characteristics, particularly sensitive receptors including those with disabilities, children and young people, old people and pregnant women.</p>
Housing	Gender	Race	Disability	Sexual Orientation	Age	Pregnancy and Maternity	Religion or belief	Marriage and/or Civil Partnership	People on low incomes	
8. Stepping up housing delivery	N	++	++	N	++	++	N	N	++	<p>Increasing the number of new homes in Westminster will positively impact on all protected characteristics. The policy is likely to have a particularly positive differential impact on children and younger people, pregnant women and those with babies, those with disabilities, and some ethnic groups who tend to have larger households/dependent children in Westminster.</p> <p>The limit on the size of new homes also helps people on lower incomes by ensuring sites are optimised for housing delivery leading to less expensive properties.</p> <p>Allowing existing housing to be reconfigured to create family sized housing is likely to have a differential positive impact on those with babies and larger families (particularly some ethnic groups).</p> <p>Providing a range of homes will have a positive impact on Some ethnic groups caring for larger families but also single person households.</p> <p>Protection from conversion to short term lets is expected to provide benefits across all protected groups.</p>
9. Affordable housing	-	--	N	N	-	--	N	N	--	<p>The policy requires 35% of all new homes to be affordable and protects all existing affordable units. It also provides that 60% of these affordable units will be 'intermediate' housing for rent or sale and 40% social rent or London Affordable Rent.</p> <p>The requirement for all new affordable units to be 60% 'intermediate' affordable rent and 40% social rent has a potential differential impact on people sharing certain protected characteristics (particularly people on low incomes, women, black, Asian, Chinese/other, households with children, the 25-44 and 45-65 age groups, who are more likely to require social housing).</p> <p>The Council monitors those with priorities for Social Housing, which shows that certain ethnic groups are overrepresented and have greater priority for Social Housing.</p> <p>Housing needs analysis shows that the total number of affordable homes required in WCC each year is 44% social (which represents need) and 56% intermediate (which represents demand). The proposed policy approach favours intermediate over social, which decreases the proportion of social housing supplied by the Council. Less social housing for these groups may lead to those households which are homeless being in temporary accommodation longer, of which around 50% is outside Westminster.</p>

										We've chosen to favour intermediate over social given an extremely low supply of intermediate housing in existence limiting choices for those on low incomes but ineligible for social housing. People registered for intermediate housing also have some protected characteristics in that they are more likely to be younger people (i.e. in the 25-44 age group) and from a black ethnic background. As a result, fewer social homes will come forward as a proportion of all affordable housing, but this is partially mitigated by an increased housing and affordable housing target overall.
10. Affordable housing contributions in the CAZ	N	N	N	N	N	N	N	N	N	Positive, non-differential impact. The policy requires contributions from certain commercial developments in the CAZ and strongly prioritises the delivery of affordable housing units on-site, which contribute to ensuring a balanced mix of uses and inclusive and sustainable communities. The policy is considered to benefit people across all equality groups.
11. Housing for specific groups	N	++	N	N	++	++	N	N	N	The policy aims to provide a mix of residential units in terms of size, type, and tenure. The requirement for 25% of all new homes to be family sized is likely to particularly benefit pregnant women/those with babies and some ethnic groups who tend to have larger families. The protection of existing specialist and supported housing floorspace, support for older people's housing and adaptations to homes occupied by older residents are likely to have a positive impact on older people. The protection of existing purpose-built student accommodation and support for new provision of this kind (of which at least 35% will be secured as affordable student housing) is likely to have a differential positive impact on younger people. Although Westminster does not currently reserve land for Gypsy and travellers, the policy sets out how permission for this use may be granted where there is an identified need. This is expected to have a positive impact on this group.
12. Innovative housing delivery	N	++	N	N	++	N	N	N	++	The incentive to provide innovative models of high-quality housing at affordable (social or intermediate) rental levels is likely to have a differential positive impact on people on low incomes, young people and certain ethnic groups who are overrepresented and have greater priority for social housing.
13. Housing quality	N	N	++	N	++	N	++	N	++	Provision of high quality homes, which meet national space standards, come with external (private or public) amenity space and are accessible and adaptable is positive for everyone. Particularly benefitting children, pregnant women/those with babies, those with disabilities, older people, people on low incomes.
Economy	Gender	Race	Disability	Sexual Orientation	Age	Pregnancy and Maternity	Religion or belief	Marriage and/or Civil Partnership	People on low incomes	
14. Supporting economic growth	N	+	N	N	++	N	N	N	++	Support for provision of a range of workspace typologies, including affordable floorspace likely to particularly benefit younger people and people on low incomes by providing more economic opportunities. Protection and support for space for SMEs in the NWEDA likely to benefit younger people and people on low incomes, but also particular ethnic groups that have a higher presence in this area.
15. Town centres, high streets and the CAZ	+	++	++	N	++	++	N	N	++	Protection of town centre function so that they continue to provide a range of shops and services including community use, and protection of isolated essential convenience retail. Also support for new extended markets. This can improve access to fresh food locally and contribute to a sense of community. This is likely to particularly benefit women (who are more likely to have caring responsibilities), older residents and those with disability (also due to mobility issues), but also children, pregnant women and those with babies (thanks to improved access to healthy food and essential services) and people on low incomes.

										<p>Supporting the use of vacant units for meanwhile uses which provide an active frontage and place more “eyes on the streets”, contributing to deterring crime and reducing fear of crime. This is more likely to benefit people 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 ethnic and/or belief who can be targets of hate crime.</p> <p>The policy also provides protection from the proliferation of uses which may negatively impact on public health (e.g. hot food takeaways, betting shops, and shisha bars). This is likely to benefit younger people and children, helping them creating healthy eating habits since young age. Sensitive receptors including children, pregnant women, those with babies and those with disabilities are likely to benefit from the additional protection from harmful effects of uses such as shisha smoking.</p> <p>Older residents are likely to particularly benefit from limitations on potentially harmful uses such as betting shops, which they are generally more sensitive to, particularly when social isolation is experienced.</p>
16. Visitor economy	N	N	++	N	++	++	N	N	+	<p>The policy seeks to balance the needs of visitors, businesses and local communities in Westminster.</p> <p>The policy supports new art and cultural uses outside of the CAZ where these can demonstrably meet the local community. Easier access to culture is expected to positively impact on the cultural wellbeing of communities, particularly benefitting those with mobility issues (typically those with a disability, older people and pregnant women) and people on low incomes.</p> <p>Directing new hotels to areas that are not predominantly residential helps reduce adverse noise impacts on local residents. This is likely to particularly benefit children, those with babies, those with disabilities, and older people.</p> <p>Ensuring provision of accessible toilets as part of new schemes that generate a large number of visitors is likely to benefit older residents and those with certain health conditions, improving their independence and physical wellbeing. The provision also seeks to minimise anti-social behaviour, which can deter people from using public areas. This is likely to have a positive effect across all protected characteristics.</p>
17. Food, drink and entertainment	N	+	+	+	++	++	N	N	+	<p>The policy protects public houses, which can play an important role as social hubs within a community. This is particularly important to enhance community wellbeing through improving social cohesion and participation in community life. This is likely to have a differential positive impact on older people who are typically more at risk of social isolation. It is recognised, however, that public houses can be associated with drinking and anti-social behaviour and they might not cater for the wider community. The policy is likely to have a differential impact on some ethnic/faith groups (who do not drink alcohol). Furthermore it might have a negative impact on public health, particularly of those with disabilities, younger and older people who may be encouraged to drink alcohol.</p> <p>The policy also requires new entertainment uses to generate wider benefits for the local community. This could include discounted access to space for community function, or the provision of learning and training for the local community. This is likely to particularly benefit young people, people with disabilities, people on low incomes, older people, those of a particular religion or belief, and different ethnic groups.</p> <p>The policy prevents the overconcentration of food, drink and entertainment uses to ensure any negative impacts from these uses are minimised and responsibly managed. This helps to avoid increase of disturbance, anti-social behaviour, crime and fear of crime, which is likely to particularly benefit young people, women, people with disabilities, older people, LGBTQI+ people, people of different ethnicity and belief.</p>

										<p>The policy also prevents new hot food takeaways within 200m walking distance from the entrance of a primary or secondary school. Hot food takeaways are associated with unhealthy food and in the interest of improving public health and establishing healthy eating habits from a young age, the policy is likely to particularly benefit children.</p> <p>Shisha smoking is a different activity to cigarette smoking. It is offered commercially at a number of premises across the city and since the introduction of smoke-free legislation it has become more visible, taking place outside premises and on the street, sometimes late into the night. This can have an impact on the amenity of public places for residents and our ability to manage the urban environment with our partners. While we recognise that shisha smoking is particularly prevalent within specific ethnic and faith groups, and that tackling the issues caused by this activity in a targeted way can give rise to perceptions of discrimination, the policy does not intend to prohibit shisha smoking or disadvantage any protected group in doing so. The restriction on the use of premises and outdoor areas for shisha smoking is intended to protect the health and amenity of local residents and users. The overall impact will be positive in seeking to improve health outcomes and reduce incidences of nuisance. The policy is expected to have differential positive health impacts on certain ethnic and faith groups, where shisha smoking is more prevalent, and on sensitive receptors including those with disabilities, children and young people, old people and pregnant women. The council prepared "Reducing the Harm of Shisha" in 2017, which looked at how effectively manage the negative impacts connected with shisha smoking. The strategy was subject to an EqIA.</p> <p>While some potential negative impacts on equality groups have been identified, the policy as a whole is considered to provide a positive impact across all groups, with particular benefits to those with a disability, LGBTQI+ people, children and young people, old people, pregnant women, those with babies and those on low incomes.</p>
18. Community infrastructure and facilities	N	N	N	N	N	N	N	N	N	<p>Positive, non-differential impact.</p> <p>The policy protects community infrastructure and facilities, supports new provision and encourages their co-location, contributes to improving access to community facilities and making community more inclusive by promoting interaction between different groups.</p> <p>Protecting community infrastructure and facilities, supporting new provision and encouraging their co-location, contributes to improving access to community facilities and making community more inclusive by promoting interaction between different groups. The 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, those with disabilities and older people).</p>
19. Education and skills	N	N	N	N	++	N	N	N	++	<p>Enhanced education provision is likely to particularly benefit young people. The requirement for major developments to contribute to building skills and improving employment prospects for local residents is likely to have a positive impact across all protected characteristics, particularly younger people and people on low incomes.</p>
20. Digital infrastructure, information and communications technology	N	+	++	N	++	++	N	N	++	<p>Investments in digital and telecommunications infrastructures will contribute to improving access to digital and local services, which is likely to particularly benefit younger people, and those with communications or mobility issues (including those with disabilities, non-native speakers and those with limited command of English, pregnant women and those with babies, and older people). A reduced need to travel to access certain services will also benefit people on low incomes.</p> <p>Improved digital connectivity can help minimise loneliness and maximise independence. This is likely to particularly benefit those with disabilities, non-native speakers and those with limited command of English, and older people. While older people might overall have less IT literacy, it is considered that the potential benefits associated with enhanced connectivity will outweigh issues linked with IT accessibility.</p>

										<p>Support for the co-location of facilities and innovations such as smart street furniture is likely to have a positive impact across protected characteristics, contributing to creating inclusive communities.</p> <p>Removal of any telecommunication apparatus that is no longer in use from the highway of public space is likely to particularly benefit people with mobility issues, including those with disabilities and older people.</p>
21. Soho Special Policy Area	N	N	N	++	++	N	N	N	++	<p>Support for social infrastructure uses and LGBTQI+ venues contributes to improving access to local community facilities and ensuring Soho remains a centre for the LGBTQI+ community. This helps foster an inclusive community, promoting improved quality of life and cultural wellbeing. This is likely to particularly benefit the LGBTQI+ community.</p> <p>The policy also supports smaller scale industries, particular the cultural, creative and visitor sectors and SMEs. This is likely to benefit younger people and people on low incomes.</p>
22. Mayfair and St. James's Special Policy Areas	N	N	N	N	N	N	N	N	N	<p>Positive, non-differential impact.</p> <p>The policy protects the function and character of the two areas as centres for the art trade and luxury retail. The policy is considered not relevant to equalities.</p>
23. Harley Street Special Policy Area	N	N	++	N	++	++	N	N	N	<p>The policy contributes to improving access to local services by protecting and encouraging medical and complementary facilities. This is likely to particularly benefit those with disabilities, pregnant women and those with babies, and older people. While the medical offer in the area is private and would not directly benefit people on low incomes, the policy is not considered to have a differential negative impact on this category.</p>
24. Savile Row Special Policy Area	N	N	N	N	+	N	N	N	N	<p>The protection and enhancement of the existing specialist cluster of bespoke tailoring can contribute to supporting specialist skills and training opportunities for apprentices. This is likely to particularly benefit younger people.</p>
Connections	Gender	Race	Disability	Sexual Orientation	Age	Pregnancy and Maternity	Religion or belief	Marriage and/or Civil Partnership	People on low incomes	
25. Sustainable transport	N	N	N	N	N	N	N	N	N	<p>Positive, non-differential impact.</p> <p>The policy seeks to maximise trips made by sustainable modes, encourage active mobility and create healthier and safer streets for all. This contributes to reducing volumes of private motor traffic, improve public transport accessibility and encourage walking and cycling. The policy is considered to benefit people across all equality groups.</p>
26. Walking and cycling	N	N	N	N	N	N	N	N	N	<p>Positive, non-differential impact.</p> <p>The policy requires developments to prioritise and enable walking and cycling. This contributes to encouraging active mobility and access to and enjoyment of the public realm. The policy is considered to benefit people across all equality groups.</p>
27. Public transport and infrastructure	N	N	++	N	++	++	N	N	++	<p>Improving connectivity, usability and capacity in public transport is expected to make a positive contribution across the protected characteristics, particularly on those with disabilities, younger and older people, pregnant women and people on low incomes.</p>
28. Parking	N	N	N	N	N	N	N	N	N	<p>Positive, non-differential impact.</p> <p>The policy supports parking-free developments, however this is balanced by the requirement to provide adequate accessible space for disabled blue or white badge holders (as set by the London Plan). This helps avoid a differential negative impact on those with mobility issues (including those with disabilities, older people and pregnant women) which may need to rely more heavily on private motor vehicles, particularly those with disabilities and older people. The reduction on noxious emissions from private motor vehicles and expected take up of active mobility</p>

										modes contributes to improved health and wellbeing. The policy is therefore considered to benefit people across all equality groups.
29. Highway access and management	N	N	N	N	N	N	N	N	N	Positive, non-differential impact. The policy protects from the loss of highway land by setting requirements to help manage access onto the road network. The policy is considered to benefit people across all equality groups.
30. Freight and servicing	N	N	++	N	++	++	N	N	N	The policy ensures servicing, collection and delivery needs originating from new developments are met on site and do not result in additional road congestion, resulting in additional noise and air pollution. This is likely to benefit all protected characteristics, particularly sensitive receptors including those with disabilities, children and young people, old people and pregnant women.
31. Technological innovation in transport	N	N	N	N	N	N	N	N	N	Positive, non-differential impact. The policy supports technological innovation in transport to improve mobility, reduce congestion and improve air quality. The policy is considered to benefit people across all equality groups.
32. Waterways and waterbodies	N	N	N	N	N	N	N	N	N	Positive, non-differential impact. The policy seeks to promote access and use of waterways and waterbodies for pedestrians and cyclists. It encourages water transport, which contributes to a modal shift to more sustainable transport options.
Environment policies	Gender	Race	Disability	Sexual Orientation	Age	Pregnancy and Maternity	Religion or belief	Marriage and/or Civil Partnership	People on low incomes	
33. Air quality	N	N	++	N	++	++	N	N	N	The policy ensures new development does not have any adverse impact on, and seeks to improve, air quality. This contributes to the creation of healthy homes, improving quality of life and addressing health inequalities. 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.
34. Local environmental impacts	N	N	++	N	++	++	N	N	N	The policy ensures exposure to a range of negative environmental impacts of development are minimised, which contributes to improved quality of life. 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.
35. Green infrastructure	N	N	+	N	+	+	N	N	N	The policy protects and supports the enhancement of Westminster's green infrastructure network, which is expected to provide a series of 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 conflicts between protecting and enhancing the City's green infrastructure networks and improving accessibility for those with mobility issues, particularly those with a disability, older people and pregnant women. The council seeks to work with applicants to ensure the delivery of open spaces that are publicly accessible to all, including people with mobility issues, particularly those with physical disabilities. Other policies in the City Plan, particularly Policy 44 'Public Realm', further ensure that the public realm is inclusive and accessible to all. By doing so, the City 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.

36. Flood risk	N	N	++	N	++	++	N	N	N	<p>The policy requires developments to be safe for their lifetime from the risk of flooding. This contributes to healthy homes and workplaces.</p> <p>This is expected to have a positive impact on all protected characteristics, particularly sensitive receptors including those with disabilities, children and young people, older people and pregnant women.</p>
37. Energy	N	N	N	N	N	N	N	N	N	<p>Positive, non-differential impact.</p> <p>The policy requires development proposals to reduce energy demand and carbon emissions and sets efficiency standards for developments. This contributes to reducing carbon emissions which affect the environment and contribute to worsening air pollution and connected adverse impacts on health. The policy is considered to benefit people across all equality groups.</p>
38. Waste management	N	N	N	N	N	N	N	N	N	<p>Positive, non-differential impact.</p> <p>The policy protects all existing waste management and recycling sites and requires new developments to make appropriate provisions for managing waste deposit and collection. The policy is considered to benefit people across all equality groups.</p>
Design and Heritage policies	Gender	Race	Disability	Sexual Orientation	Age	Pregnancy and Maternity	Religion or belief	Marriage and/or Civil Partnership	People on low incomes	
39. Design principles	N	N	N	N	N	N	N	N	N	<p>Positive, non-differential impact.</p> <p>The policy sets out a people-centred approach to new buildings and public realm, which promotes exemplary design. It requires new developments to create inclusive and accessible spaces and places, which incorporate design measures to reduce the opportunity for crime and anti-social behaviour, also contributing to the reduction of fear of crime.</p> <p>The policy also ensures all developments are of high-quality standards, contributing to the creation of high-quality homes, and that they incorporate inclusive design principles, contributing to enhancing health and wellbeing. These are expected to have a positive impact on all protected characteristics.</p>
40. Westminster's heritage	N	N	-	N	-	-	N	N	N	<p>The policy seeks to conserve and enhance Westminster's heritage assets and encourages development to optimise the positive role of the historic environment, including for cultural value and public enjoyment. There may be some conflict between protecting heritage assets and being able to improve accessibility for those with mobility issues, particularly those with a disability, older people and pregnant women.</p>
41. Townscape and architecture	N	N	++	N	++	++	N	N	N	<p>The policy requires development to be sensitively designed with regards to its context.</p> <p>There may be some conflict between protecting heritage assets (including architectural details like railings and street furniture) and being able to improve accessibility for those with mobility issues, particularly those with disabilities, older people and pregnant women.</p> <p>However, the policy also sets out provisions to allow alterations and extensions to residential buildings, which can contribute to the provision of housing of different types and sizes and to the reduction of unfit homes, helping people live in healthy, high quality homes throughout their life and stay independent for longer. This is likely to particularly benefit children, older people, people with disabilities, pregnant women, and those with babies.</p> <p>On balance, the policy is considered to have a positive impact on these characteristics.</p>
42. Building height	N	N	-	N	-	-	N	N	N	<p>The policy sets out a positive strategy for tall buildings, identifies locations where tall buildings may be appropriate and provides design principles for such developments. This contributes to enhanced townscape and public realm, and increased legibility, which support sustainable transport choices.</p> <p>While the policy seeks to mitigate negative impacts on amenity, some protected characteristics might still be affected. Developments with amenity impacts are likely to</p>

										adversely affect those with mental or physical disabilities. Older people, who are generally less mobile, pregnant women and those with babies might also be negatively affected as they tend to spend more time at home.
43. Building height in the housing renewal areas	N	N	-	N	-	-	N	N	-	<p>The policy identifies opportunities for taller buildings in the Church Street/Edgware Road and Ebury Bridge housing estates.</p> <p>Tall buildings can have negative impacts on resident amenity, and some protected characteristics might be affected. In particular, negative amenity impacts of tall buildings if not designed appropriately are likely to adversely affect those with mental or physical disabilities. Older people, who are generally less mobile, pregnant women and those with babies might also be negatively affected as they tend to spend more time at home. Being housing estate areas, overall any negative impact on amenity would have a differential effect on people on low incomes.</p> <p>Each renewal area is subject to their individual EqIA. The council has also developed policies in relations to tenants and leaseholders that need to move home during the renewal works, which are also subject to detailed EqIAs.</p>
44. Public realm	++	++	++	++	++	++	++	N	N	<p>No differential negative impact.</p> <p>The policy sets out principles for a public realm that is safe, attractive and accessible to all.</p> <p>It prioritises pedestrian movement and addresses the need of different people, fostering an inclusive community. This is expected to have a positive impact on all protected characteristics, particularly those with disabilities, children and young people, older people (including those with dementia and mobility requirements), pregnant women and those with babies.</p> <p>The requirement for a safe public realm is likely to particularly 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.</p>
45. Security measures in the public realm	++	++	++	++	++	N	++	N	N	<p>The policy requires development to provide an integrated approach to security of the site, including buildings and any associated public or private spaces. The policy also set the requirement for developments and/or public realm improvements that may be vulnerable to terrorism to incorporate appropriate security measures in the design, improving the resilience for terrorism related crime.</p> <p>The requirement for a safe public realm is likely to particularly 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.</p>
46. Basement developments	N	N	N	N	N	N	N	N	N	<p>Positive, non-differential impact.</p> <p>The policy requires basement developments to be designed and constructed to minimise the impact at construction and occupation stages on the surrounding area, and to incorporate measures to safeguard structural stability. The policy is considered to benefit people across all equality groups.</p>

7. Mitigation actions

Policy	Protected characteristics which may be negatively impacted by the policy	Identified potential negative impact	Mitigation	Follow-up actions needed?
9. Affordable Housing	Gender Race/Ethnicity Age Pregnancy/Maternity People on low incomes	<p>The policy requires 35% of all new homes to be affordable and protects all existing affordable units. It also requires that 60% of these affordable homes to be 'intermediate' housing for rent or sale and 40% to be social rent or London Affordable Rent.</p> <p>These proportions are broadly in line with the findings of the Housing Needs Analysis which estimates that 44% of the affordable homes required annually are social and 56% are intermediate. However, it differentiates between both types of affordable housing by describing social housing as 'need' i.e. for households with few choices and intermediate housing as 'demand', although it acknowledges there is cross over between the two.</p> <p>Favouring the intermediate tenure has the potential to reduce supply for those in need of social housing who are over represented, compared to the Westminster population, amongst certain groups as set out in the council's annual Supply and Allocation of Social Housing Report (https://www.westminster.gov.uk/housing-strategies). Overall households requiring social housing are more likely to be: from a Black, Asian, Chinese/Other or Middle Eastern ethnic background, Women, households with children, in the 25 – 44 and 45 – 64 age groups and have low incomes.</p> <p>Less social housing for these groups may lead to those households which are homeless being in temporary accommodation longer, of which c50% is outside Westminster.</p> <p>At the time households registered for intermediate housing also have different protected characteristics in that they are more likely to be, compared with the Westminster population, younger i.e. in the 25 – 44 age group and from a Black ethnic background. There are fewer 'over representations' however when they are compared with households registered for social housing.</p>	<p>We have chosen to favour intermediate over social affordable to meet a number of policy aims:</p> <ul style="list-style-type: none"> • Intermediate housing makes up less than 2% of housing in Westminster and there is an aim to build up the stock to provide more choice and a less polarised housing market • To help prevent people with moderate incomes moving away from Westminster due to the lack of housing opportunities. There are few opportunities for those on moderate incomes that aspire to more settled or independent housing, as market housing to buy is beyond the reach of many. Westminster is one of the least affordable boroughs in London <p>The following will help to mitigate the impact on households needing social housing:</p> <ul style="list-style-type: none"> • Households on the council's social housing register have high priority for intermediate housing • Targets will be set to ensure a proportion of new intermediate housing is affordable to households on the register with lower quartile incomes – and so may be affordable to households also registered for social housing. Westminster Employment Service also helps homeless households into employment which will help homeless households to be eligible for intermediate housing. (Currently c50% of homeless households are in some form of employment) • By setting a higher housing target than is required by the London Plan and by increasing the affordable housing requirement to 35% - this will increase social housing provision to levels that may otherwise not have been delivered. <p>While the potentially negative impact of this policy cannot be fully mitigated, overall it is considered justified to meet a number of wider legitimate policy aims.</p>	Monitoring social and intermediate registers
35. Green infrastructure	Disability Age (older people) Pregnancy/Maternity	<p>The policy protects and supports the enhancement of Westminster's green infrastructure network, which is expected to provide a series of 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.</p> <p>There may be some conflicts between protecting and enhancing the city's green infrastructure networks and improving accessibility for those with mobility issues, particularly those with a disability, older people and pregnant women.</p>	<p>The council seeks to work with applicants to ensure the delivery of open spaces that are publicly accessible to all, including people with mobility issues, particularly those with physical disabilities. Other policies in the City Plan, particularly Policy 44 'Public Realm', further ensure that the public realm is inclusive and accessible to all. By doing so, the City Plan mitigates a potential negative impact on these protected characteristics.</p> <p>Overall, it is considered that the policy will provide benefits for all, particularly on sensitive receptors.</p>	No

<p>40. Westminster's heritage</p>	<p>Disability Age (older people) Pregnancy/Maternity</p>	<p>There may be some conflict between protecting heritage assets and being able to improve accessibility for those with mobility issues, particularly those with a disability, older people and pregnant women.</p>	<p>To mitigate any potential conflict and ensure appropriate consideration is given to accessibility, Policy 39 'Design principles' requires all development to be inclusive and accessible and notes in supporting text that <i>applicants will be required to demonstrate that access provision has been considered effectively</i> - this also applies to heritage assets. The policy also specifically recognises in supporting text para 39.7 that access to historic buildings can present additional challenges but makes clear that there are almost always a solution and scope to make improvements. As such, finding a solution to allow improvements to accessibility will be an expectation. To assist with this, it notes the need to consider alternative approaches and solutions when dealing with heritage assets, recognising that <i>in some locations this may not just be about physical access but should also consider the ways in which services and information can be managed and provided to meet the needs of all users.</i></p> <p>Further mitigation is provided in Policy 40 'Westminster's heritage' through part A which specifically sets out an overarching heritage policy objective to promote public access to Westminster's heritage assets. The Heritage Policy at part B(ii) also notes the expectation that <i>development will secure the conservation and continued beneficial use of heritage assets through [...] sensitive adaptation which will avoid harm to their significance, while allowing them to meet changing needs.</i> It notes within supporting that we will encourage creative design approaches to the upgrading of historic buildings. Overall it is considered this provides sufficient scope and flexibility to ensure appropriate solutions can be found to improving accessibility of heritage assets and mitigate any negative impact.</p>	<p>No</p>
<p>41. Townscape and architecture</p>	<p>Disability Age (older people) Pregnancy/Maternity</p>	<p>The policy requires development to be sensitively designed with regards to its context.</p> <p>There may be some conflict between protecting heritage assets (including architectural details like railings and street furniture) and being able to improve accessibility for those with mobility issues, particularly those with disabilities, older people and pregnant women.</p>	<p>To mitigate any potential conflict and ensure appropriate consideration is given to accessibility, Policy 39 'Design principles' requires all development to be inclusive and accessible and notes in supporting text that <i>applicants will be required to demonstrate that access provision has been considered effectively</i> - this also applies to heritage assets. The policy also specifically recognises in supporting text para 39.7 that access to historic buildings can present additional challenges but makes clear that there are almost always a solution and scope to make improvements. As such, finding a solution to allow improvements to accessibility will be an expectation. To assist with this, it notes the need to consider alternative approaches and solutions when dealing with heritage assets, recognising that <i>in some locations this may not just be about physical access but should also consider the ways in which services and information can be managed and provided to meet the needs of all users.</i></p> <p>Policy 41 also sets out provisions to allow alterations and extensions to residential buildings, which can contribute to the provision of housing of different types and sizes and to the reduction of unfit homes, helping people live in healthy, high quality homes throughout their life and stay independent for longer. This is likely to particularly benefit children, older people, people with disabilities, pregnant women, and those with babies.</p> <p>By doing so, it is considered that the above provisions mitigate any negative impact on protected characteristics.</p>	<p>No</p>
<p>42. Building height</p>	<p>Disability Age (older people) Pregnancy/Maternity</p>	<p>Developments with amenity impacts from tall developments have the potential to adversely affect those with mental or physical disabilities. Older people, who are generally less mobile, pregnant women and</p>	<p>To protect residents' amenity from unacceptable negative impacts from development, Policy 7 'Managing development for Westminster's people' was devised. The policy further mitigates these impacts by preventing unacceptable adverse impacts on daylight and sunlight and significant</p>	<p>No</p>

		those with babies might also be negatively affected as they tend to spend more time at home.	increases in sense of enclosure, overshadowing, loss of privacy and overlooking.	
43. Building height in housing renewal areas	Disability Age (older people) Pregnancy/Maternity People on low incomes	Negative amenity impacts from tall developments have the potential to adversely affect those with mental or physical disabilities. Older people, who are generally less mobile, pregnant women and those with babies might also be negatively affected as they tend to spend more time at home. Being housing estate areas, overall any negative impact on amenity would have a differential effect on people on low incomes.	To protect residents' amenity from unacceptable negative impacts from development, Policy 7 'Managing development for Westminster's people' was devised. The policy further mitigates these impacts by preventing unacceptable adverse impacts on daylight and sunlight and significant increases in sense of enclosure, overshadowing, loss of privacy and overlooking. Each renewal area is subject to their individual EqIA. The council has also developed policies in relations to tenants and leaseholders that need to move home during the renewal works, which are also subject to detailed EqIAs.	No

Appendix 1: Legal Framework and Key Legal Principles

1. The Council is subject to the Public Sector Equality Duty (PSED) under section 149 of the Equality Act 2010. The PSED provides (as relevant):

(1) 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.

...

(3) Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to—

(a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;

(b) 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;

(c) 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.

(4) The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.

(5) Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to—

(a) tackle prejudice, and

(b) promote understanding.

(6) Compliance with the duties in this section may involve treating some persons more favourably than others; but that is not to be taken as permitting conduct that would otherwise be prohibited by or under this Act.

(7) *The relevant protected characteristics are -*

- *sex;*
- *race;*
- *disability;*
- *sexual orientation...*
- *age;*
- *gender reassignment;*
- *pregnancy and maternity;*
- *religion or belief;*

2. A helpful summary of the obligations arising under the s.149 of the Equality Act 2010 duty was provided by McCombe LJ in R (Bracking) v Secretary of State for Work and Pensions [2013] EWCA Civ 1343 at paragraph [26]. In particular, the courts have emphasised the following key principles:

- i. the PSED is “**continuing**” and “**non-delegable**”;
- ii. the PSED is a duty to have regard to the need to (a) eliminate unlawful discrimination; and (b) advance equality of opportunity and (c) foster good relations between people with protected characteristics and those without it.
- iii. The PSED is **not a duty to achieve any of those things** or to take certain steps. It is not even a duty to avoid steps which be retrograde as far as those aims are concerned. The PSED is, above all, concerned with **confronting decision makers with the indirectly discriminatory effect of their decisions** and ensuring that these effects are considered in the decision making process.
- iv. The duty can be owed to **groups of people or to a single person**.
- v. An important evidential element in the demonstration of the discharge of the duty is the recording of the steps taken by the decision maker in seeking to meet the statutory requirements;
- vi. the assessment of any adverse impacts of a decision on persons with protected characteristics and the ways in which such risk may be eliminated must be assessed **before** a decision is taken;
- vii. “**Due regard**” means having “**proportionate regard**” appropriate in all the circumstances. Decision makers are not expected to explore every last possible differential impact of a proposed decision. (*R (Baker) v SSCLG* [2008] EWCA Civ 141 at [31]);
- viii. The duty must be exercised in substance, with rigour and an open mind (*London Borough of Hackney v Haque* [2017] EWCA Civ 4 at [22]). Mere reference to the duty may not be enough. Alternatively, a failure to reference the duty may not be determinative if in substance impacts

have been considered (*R (McDonald) v Kensington and Chelsea Royal LBC* [2011] UKSC 33 at [24]);

- ix. There is **no statutory duty to carry out EIA** (*R (Cordant Group Plc) v SSBIS* [2010] EWHC 3442 (Admin) at [72]) but in practice, EIAs provide a very useful way to evidence that the PSED has been discharged.

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