

Equality Impact Assessment

1. Service affected

Planning policy

2. Relevance to equality

You need to make clear if the policy/function is highly relevant, relevant or not relevant to equality. To determine relevance to equality you need to complete the 'Checklist for determining relevance to equality'

Please detail which groups are most affected.

This project is relevant to equality as it is aimed at the development and provision of buildings and spaces across the borough. As a result, the guidance is particularly relevant to the protected groups of age, disability, sex, gender reassignment and race.

The guidance also impacts the aim of advancing equality of opportunity as it has aims to promote better wellbeing outcomes and sustainability as well as being a reference tool to provide clarity on the development aims of the borough.

3. Potential savings

Please detail the proposed savings to budget that you are hoping to make.

How will this be achieved?

The guidance does not propose savings to budgets.

4. Policy/service proposal

You will need to detail the following:

- Please provide a profile of the service including its purpose, how and where the service is delivered and who uses it.
 - What are the specific changes that you are proposing and what will these changes deliver?
 - Are these proposals just linked to savings or is there a solid business case for this? Please detail
 - How will this change support our wider objectives such as the Corporate Plan or directorate business plans?
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Both national and regional planning policy place a clear emphasis on good design and the role of Local Authorities in determining what this looks like for their area. The council is required by The National Planning Policy Framework (2023) to prepare design guides or codes to provide clarity about design expectations at an early stage (Para. 133). To carry weight in decision making, these codes should be

produced as Supplementary Planning Documents (SPD) (Para.134). This guidance should be prepared to be consistent with the principles set out in the National Design Guide reflecting local character and local design preferences, providing a framework for creating high-quality places.

The Bexley Local Plan was adopted in 2023, and together with the London Plan, comprises the statutory Development Plan for the borough. The Design Guide SPD expands on the broader themes set out in the Development Plans and will provide more detailed guidance as to how statutory policies should be applied within the Bexley context. This will ensure development is coordinated and reinforces the local distinctiveness of Bexley, discouraging generic development that does not complement the borough's context or the needs of current and future residents. The health and well-being of all people lie at the heart of the document, with a desire to ensure the new development proposals are accessible and inclusive to all.

The design guidance is produced to assist applicants, landowners, designers, decision makers and the wider community who are proposing and determining new development across Bexley.

In summary:

- The guidance will replace several outdated Bexley planning guidance documents and, as the guidance has been written to support the Bexley Local Plan adopted in 2023, it will provide renewed, and more relevant, information across a range of topics, to aid people proposing and determining new development in the borough.
- Guidance is organised across three different sections, further broken down into several chapters which set out Bexley's ongoing vision for growth. The guidance will be an accessible PDF document that will be downloadable from the Council's website and therefore available to a wide range of people – from applicants to householders, designers and decisionmakers. It will support a range of wider Council objectives around good growth, high quality design, sustainability and the protection of the environment.
- The guidance will support our [Bexley Plan 2022-26](#), which is our vision for the borough, in particular supporting priority 1: aspiration for our residents and priority 2: ambition for our borough.
- The design guidance will also support the [Bexley Local Plan](#) policies, providing further, more detailed information on what good design means in Bexley using both written and visual tools to illustrate the guidance.

5. Impact on equalities groups

Please detail the likely impact of your proposals on each equality group including service users and potential service users, supported by demographic evidence.

The equality groups are

- Age
- Disability

- Sex
- Gender reassignment
- Pregnancy and maternity
- Race
- Religion or belief
- Sexual orientation
- Marriage and civil partnership (but only for aim one of the duty)

You will need to consider these impacts in relation to the duties detailed under the Public Sector Equality Duty. What evidence do you currently have about who uses this service, how important is this service to each equality group and the likely impact of your proposals on each equalities group?

You will be expected to use demographic information to show the composition of the service users in each of the equality groups. If we do not have such information, please state the group and that no information is currently recorded.

What demographic data is missing and how would you be able to fill this gap?

Demographic Data for Bexley

There is national, regional, and local evidence available which shows that people with certain protected characteristics can face barriers in employment, access to services and information.

The 2021 Census (ward profiles available on the council website), and equality related evidence from [the Bexley Data Observatory](#) have been used in this assessment.

The Bexley Data Observatory identifies 'the big picture' in terms of health and wellbeing needs and inequalities of a local population and informs future service planning, taking into account evidence of effectiveness.

There is potential for the guidance to have direct and indirect positive impacts for all protected groups by setting out to provide guidance that allows the Council to ensure that ongoing development in Bexley is both sustainable and accessible to all.

Equality Group	Bexley Statistic	Analysis of Impact	Assessment of Impact
Age	Across the borough, the demographic of Bexley differs. Towards the south, the population is largely ageing and relatively affluent, whereas to the north, the population is generally younger, more ethnically diverse, and more deprived. Bexley has an aging population; it is predicated that the population over 75 will almost double by	Potential direct and indirect impacts on protected group	Public space may feel unwelcoming and therefore foster feelings of unsafety for people of different age groups due to its design and layouts, for example inadequate lighting levels, unclear wayfinding and a lack of seating provision. Developments should support cultural and social activity, considering all age groups in their design to maximise health and wellbeing gains.

Equality Group	Bexley Statistic	Analysis of Impact	Assessment of Impact
	<p>2050. The younger population will also increase, but at a lesser extent. Children and young people (under 25) account for a third of the population, with over 65s accounting for a sixth.</p>		
Disability	<p>In 2021, 14.6% of Bexley's population were recorded as having a disability and of this number, 6.2% of residents living with a disability find it limits their daily activities a lot.</p>	<p>Potential direct and indirect impacts on protected group</p>	<p>Street furniture and signage within the public realm may hinder movement for certain groups with disabilities or present physical barriers for the visually impaired. Furthermore, some play features may be unsuitable for children with impaired mobility, preventing them from engaging with the play equipment. Development should also account for those with hidden disabilities, with designers mindful of the sensory implications of their proposals. New development must be accessible to all.</p>
Sex	<p>The 2021 Census shows that the borough population is made up of a 48% male to 52% female ratio.</p>	<p>Potential direct and indirect impacts on protected group</p>	<p>The design of public space should not be a barrier to those of different sexes, should be designed to be welcoming and inclusive and should respond to specific community needs. The public realm should be designed to encourage young girls to interact with the space rather than being hindered through the provision of facilities typically more attractive to young boys and thus alienating to young girls. Providing suitable facilities, such as private changing rooms, or seating around a playing field, for example, could be useful in making public space feel more welcoming.</p>
Gender Reassignment	<p>The 2021 Census shows that 0.5% of Bexley's population did not identify with their registered sex at birth – however this does not provide specific data on those</p>	<p>Potential direct and indirect impacts on protected group</p>	<p>The design of public space should ensure that those who have undergone gender reassignment feel welcome within spaces through their inclusive design, for example, with appropriate lighting levels and suitable</p>

Equality Group	Bexley Statistic	Analysis of Impact	Assessment of Impact
	who have undergone gender reassignment.		visibility and the passive surveillance of spaces.
Pregnancy and Maternity	With births projected to be 3182 in 2021, this suggested the birth rate was falling across the borough.	Potential direct and indirect impacts on protected group	Within new public buildings and spaces, adequate facilities should be provided to ensure pregnant people and those with young children are catered for and feel comfortable in using the spaces, as necessary.
Race	Bexley is a diverse borough, where the ethnic minority population is increasing and catching up with neighbouring boroughs and the rest of Greater London. The 2021 Census information shows 28.1% of Bexley's population is comprised ethnic minorities, increasing to 35.6% when accounting for white minorities.	Potential direct and indirect impacts on protected group	The provision of new developments and public space can be alienating to those of different races if they do not feel they can take ownership of the public realm, and therefore it needs to be adequately designed to enable programming that is reflective of Bexley's diverse communities.
Religion and Belief	The most recent Census information from 2021 shows that 60% of residents say they are religious, with the highest group being Christian at 50%. 34% of the borough claim no religious belief.	Potential direct and indirect impacts on protected group	The creation of new or enhanced public space should not be exclusionary to anyone based on their religion or belief and should be designed to be inviting, accessible and inclusive to all.
Civil Partnerships and Marriage	Married people or those in a civil partnership account for the highest population in the borough at 46.1%. This is followed by those never married or registered in a civil partnership at 37.3%.	There is not considered to be a difference in the potential affect between people who share a protected characteristic and those whose do not	-
Sexual Orientation	In the 2021 Census, 91% of Bexley's population identified as heterosexual, with 2.11% of the population over 16 identifying as LGBTQIA+.	Potential direct and indirect impacts on protected group	The provision of new public spaces and buildings should be adequately designed and programmed to be accessible, inclusive and mitigate potential feelings of isolation for those within this protected group.

6. Supporting evidence about why a change is required?

What is the context to the proposed change in policy/function? Please concisely describe the relevant background/context as to why the change is being proposed. For example, is there national guidance that promotes the change? Best practice? Credible independent research about the outcome being sought? Financial situation of the service/Council?

Is this proposal likely to be subject to a public consultation with service users and potential service users? Please state when consultation is/was carried out and give overview (including whom consulted; different methods used to make sure relevant people asked; issues raised by people and action taken on any of these issues – did we change anything in relation to the consultation feedback?)

Following the adoption of the Bexley Local Plan in April 2023, detailed design guidance that expands on the themes set out in the Local Plan, is required by the National Policy Planning Framework.

Consultation with key stakeholders has shaped the development of the guidance.

A range of consultees were engaged at various stages on key sections of the document relevant to their expertise. For example, workshops with Development Management officers offered insights into key topics and issues frequently arising in planning applications allowing these topics to be disseminated and explored further within the guidance. These topics were tracked, considered for their appropriateness to the document's aims and included within the guidance where relevant.

Internal consultation within the Council was conducted ahead of the draft publication of the *Design Guide SPD Part 1 – Design Principles*, which included this EqIA. This consultation was circulated to those whose services support people with protected characteristics to ensure the widest possible views were duly considered.

The statutory consultation period took place from 22 July – 13 September 2024, comprising online and printed publication of the draft guidance for comment from all members of the public. Printed copies were distributed to all 13 libraries across the Borough for the duration of the consultation period, and one copy was held in the Contact Centre of Bexley Civic Officers. During the consultation period, a digital copy of the document was available alongside an online survey which sought feedback on the relevance and robustness of the guidance document. Three drop-in events were held in libraries across the Borough, allowing individuals to discuss the *DGSPD Part 1 – Design Principles* with Officers, providing an alternative forum to online and written feedback.

Over the course of the statutory consultation period, comments were received from statutory bodies, including TfL, Thames Water and the Environment Agency. The Council also received responses from several Bexley residents and businesses with interests in the Borough. All comments received were analysed and considered and where appropriate, amendments to the guidance document were proposed.

A final draft of the *Design Guide SPD Part 1 – Design Principles* has been prepared for adoption and reflects the comments received and resultant amendments made following public consultation. These comments and proposed amendments have been collated and summarised within the Consultation Statement.

7. Possible mitigating actions

Please detail how any potential negative impacts for each equalities groups could reasonably be addressed?

If possible, please indicate what you think the likely cost of mitigation would be.

Potential impacts for all equality groups are reasonably addressed in the guidance by ensuring that all applicants consider the impact of their development proposals for all:

Age - the guidance promotes the design of public space to be inclusive, open, and welcoming to all demographics. The proper need for the consideration of safety within public space is also promoted in the guidance – with chapters on suitable lighting design, wayfinding and designing streets and public spaces that support the health and wellbeing of all people with incidental play, seating, and exercise features. The guidance supports the development of community-focused public space that can provide a range social and cultural offerings for all ages.

Disability – guidance around the design of street furniture and signage to ensure it does not hinder movement on streets or create physical barriers for the visually impaired is provided. The guidance also promotes the design of play space that is accessible to all with suitable features for children with impaired mobility, and the design for hidden disabilities such as autism by making spaces legible and looking for opportunities to create quieter spaces within schemes.

Sex – the guidance places an emphasis on the importance of designing welcoming and inclusive public space for all – with a specific focus on public space being attractive to young girls by avoiding the exclusive provision of facilities that are typically dominated by young boys.

Gender Reassignment – in promoting the design of welcoming and inclusive space, the guidance encourages applicants to follow the Mayor of London guidance on Safety in Public Space for Women, Girls, and Gender Diverse People.

Pregnancy and Maternity – the guidance promotes public spaces to support the health and wellbeing of all users, suggesting the provision of incidental place space, seating and welcoming areas, with a specific focus throughout on guidance on making space welcoming to women, girls and gender diverse people.

Race – The guidance states that developers will be required to put in place a maintenance plan for public space that complies with the Public London Charter principles. Principles within this state the need for public space to be “enable users to meet, associate, spend time with others and celebrate their community. It should make provision for community-led and cultural activities that reflect the diversity of London’s communities, as well as public art and other ways of celebrating diversity in the public realm.”

Religion and Belief – The Public London Charter principles are robust in their promotion of public space being welcoming and open to all and having a community focus, designed to reflect the diversity of communities and celebrating this publicly through programming and art, for example.

Sexual Orientation - The Public London Charter also promotes staff in new public buildings and spaces being given “appropriate training with an emphasis on equality, diversity and inclusion so that all people feel welcome,” which is necessary for people to feel supported, comfortable and welcoming in new developments.

Officer Drafting; Nompsy Chigaru

Date 07.11.24

Agreed by Director

Date
