

Equality Impact Assessment (EqIA) for London Plan Guidance

London Plan Guidance:	Public London Charter
Date:	September 2021

1. Please provide an outline of the guidance, who it is aimed at and any key issues to be aware of.

The creation of a Public London Charter (the Charter), which the Mayor has committed to in Policy D8 Public Realm, Part H. The Charter will set out principles for the rights and responsibilities of the owners, managers and users of new public space. It will apply to the public space provided as a public benefit of the development. Guidance on implementing these principles will accompany the Charter. For the avoidance of doubt the Charter does not directly cover the design of public space.

2. Which of the Public Sector Equality Duty aims are relevant to the guidance and the impacts identified?

- 1) Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- 2) Advance equality of opportunity between people who share a protected characteristic and those who do not, in particular having due regard to the need to:
 - a) Remove or minimise disadvantages suffered by people due to their protected characteristics.
 - b) Take steps to meet the needs of people with certain protected characteristics where these are different from the needs of other people.
 - c) Encourage people with certain protected characteristics to participate in public life or in other activities where their participation is disproportionately low.
- 3) Foster good relations between people who share a protected characteristic and those who do not.

Assessment

List aspects of the guidance that might affect particular groups

Guidance key aspects, chapter headings, theme etc	Particular group that could be affected
Encouraging spaces to be open, accessible and inclusive	Black, Asian and Minority Ethnic groups Disabled people Younger people
Reducing barriers to access to public spaces	Disabled people Older people Pregnant women and mothers
Allowing for parts of or entire public spaces closed off either temporarily or permanently for restricted use could lead to the forming of barriers to participating in city life.	Older people Disabled people LGBTQ+ people Pregnant women and mothers
Helping to create a travel environment in London that feels safe to all users during the day time and night.	LGBTQ+ people Sex (Men and women) Black, Asian and Minority Ethnic groups

It should be noted that the general policy requirement and principles are already required through the London Plan. This London Plan Guidance is providing further detail on how the policies should be implemented, and therefore further amplifying the effects.

Equality impacts, mitigating actions and justification (where applicable)

Group	Potential impact description What positive and negative impacts have been identified (known and potential) for particular groups?	Relevant PSED aim (1, 2a, b or c, and/or 3)	Actions identified and/or justification For negative impacts, set out mitigating actions to minimise or eliminate negative impacts and any action plan. If negative impacts cannot be mitigated, provide <u>objective justification</u> . For positive impacts, consider how these could be maximised.	Assessment of equality impacts Score each impact as either: +2 Strong positive +1 Positive 0 Neutral - 1 Negative - 2 Strong negative Mixed or uncertain
Age	Positive The Charter encourages increased access to areas of public spaces (part of the wider public realm). It also aims to make such spaces more inclusive. This could potentially make parts of the public realm and the external environment more welcoming and increase people's likelihood to use active travel modes, which could in turn help to reduce	1 2b 2c 3		+2

	inequalities in physical and mental health and wellbeing as the policy will help to bring forward safe, welcoming, secure and inclusive places and spaces. This is likely to have a positive impact for groups who may be more likely to experience barriers to access or inclusion, including older people, as well as groups at greater risk of poor mental health which includes young women and people aged 35-44.			
	Encouraging public space to be more open, accessible and inclusive is likely to mean that more people congregate in a given area which can provide more opportunities for Londoners of every background to connect, helping to advance equality of opportunity and foster good relations particularly for older Londoners who are more likely to experience social isolation. This is therefore likely to be beneficial for groups who are at higher risk of social isolation such as older Londoners.	2b 2c 3		+2
	Children and teenage girls are more likely to have restrictions placed on their mobility freedoms due to perceived dangers of public space. Creating public space in London that is safer, more welcoming, and more consistently regulated is likely to have a positive impact for these groups by facilitating independent mobility and supporting their right to	2a 2b 2c 3	Enhancement opportunity: Through the principle 'Good Stewardship' the Charter will help to ensure that new public space in London is safer and more welcoming. It clarifies that stewardship of public spaces day-to-day should not be officious but informal and friendly in manner. Both supervision and maintenance activities should be	+2

	safety, both actual and perceived in these spaces. It may also provide more opportunities for children to engage in social interaction and informal play away from home and school in places such as parks/green spaces that provide access to nature. This may be particularly beneficial for children in London, who are less likely than children in other parts of England to make visits to the natural environment.		carried out in a manner that is considerate of the users of the public space. However, to ensure that public space is safe and secure for all users, the Charter makes it clear that enforcement of any restrictions on the use of the public space should be appropriate and reasonable, and carried out by staff who have undertaken appropriate training – including unconscious bias training. The importance of youth engagement training is specifically referenced in the guidance given the experience of exclusion young people often face in public spaces.	
	Negative Having parts of or entire public spaces closed off either temporarily or permanently for restricted use e.g. ticketed events could have a negative impact on people and groups for whom the nature of London's built environment can either support or form barriers to participating in city life. This is particularly relevant to older people and those with pushchairs, who may face barriers in accessing many services and buildings because of how buildings, spaces and places are designed and managed.	2b 2c 3	Mitigation: The Charter principles aim to address the issue of barriers to access and inclusion in the public realm. It is a requirement of the principle 'Openness' that owners and managers of spaces are to ensure that the " <i>public space should be open to all and offer the highest level of public access and use possible...</i> ". Also the 'Free of Charge' principle requires that " <i>Ticketed events should be announced in advance with reasonable notice and should minimise their impact on the accessibility and enjoyment of the space for other users</i> " These requirements should make navigating the public realm less stressful for	+1

			people who face barriers to accessing services and buildings if parts of spaces are closed off or routes through spaces disrupted, such as older people, by allowing them to plan for the potential disruption and alternate routes.	
	Encouraging public spaces to be as open as possible with activities allowed as a default such as cycling and skating could have a negative impact on older people as some people within that group may have limited mobility and move at a slower pace and feel less safe if people are moving at faster speeds through the public space.	2a 2b	Mitigation: The Charter allows for 'safe cycling' to keep spaces safe and mitigate potential impacts between cyclists and other users in a space. If a space is deemed inappropriate for specific activities, the charter allows for site-specific regulations to be applied to a space which are developed in consultation with relevant stakeholders including the local community, based on robust evidence demonstrating the need for them, and weighed up against the impact on individuals, groups and the public generally.	+1
Disability	<p>Positive</p> <p>Increasing Londoners' access to areas of public realm and the requirement for areas of public space to be inclusive, could potentially make the external environment more welcoming. The Charter is likely to have a positive impact for groups such as disabled people, as well as groups at greater risk of poor mental health including disabled adults. People in these groups may be more likely to experience physical and other potential barriers to access or</p>	1 2a 2b 2c 3		+2

	<p>inclusion such as costs associated with entry and use of a space.</p>			
	<p>Encouraging public space to be more open, accessible and inclusive is likely to provide more opportunities for Londoners of every background to connect help to advance equality of opportunity and foster good relations. This is therefore likely to be beneficial for groups who are at higher risk of social isolation such as disabled Londoners.</p>	<p>2a 2b 2c</p>		+2
	<p>Announcing and publicising any closures affecting a space well in advance and in an accessible format is likely to be helpful for people who may have difficulties navigating around ‘events’ such as blind or partially sighted people, people with certain neurodiverse conditions, and others who may have limited mobility. By encouraging this approach, the Charter may help to ensure that people with this protected characteristic are made aware of changes being proposed to public space and have the opportunity to be consulted with or ask for disability access to be considered.</p>	<p>1 2a 2b 2c</p>	<p>Enhancement opportunity: The Charter asks that an assessment of the impacts any closures would have, and the mitigation measures required, be undertaken and clearly set out in the management plan for the public space, and that any closures affecting a space are announced well in advance, and publicised in an accessible format. This will help ensure that people who may be affected by closures are able to be notified early and can plan for the potential disruption/alternate routes. This is likely to be helpful and make navigating the public realm less stressful for people who may have difficulties navigating around events and the installations associated with them.</p>	+2
	<p>Negative</p>			

	Balancing the consideration of commercial events against the wider public use of a public space for certain periods of time could have a negative impact for some groups. Spaces being used for commercial events could cause an obstruction, or additional travelling distances which could be problematic for some disabled people for whom travel distances are critical, blind and partially sighted people who may have difficulties navigating around 'events', or people with certain neurodiverse conditions who may have difficulties navigating the changes in the route/ environment. Disabled people are more likely to be on lower incomes or unemployed than non-disabled people. This may mean access to free events is even more important for this group	1 2a 2b 2c	Mitigation: Successful public spaces need resources for stewardship, maintenance, community involvement, security or enlivenment. Events can help to promote use of public space, with commercial elements and sponsorship used to help meet running costs. It is important that these are in line with the ethos of public space and do not compromise the principle of maximising overall accessibility to the space. Mitigation: Requiring that events held in public spaces do not unreasonably compromise the accessibility to and enjoyment of the space for other users either through their frequency or the extent of the space that is used - and where possible are offered free - could help to ensure that events are more inclusive for all Londoners, including groups who may be on lower incomes or unemployed and have fewer opportunity to attend paid/ticketed events.	+1 +1
	Encouraging public spaces to be as open as possible with activities allowed as a default such as cycling and skating could have a negative impact on disabled people, as some people within that group may have limited sight and/or mobility. This may mean that they move at a slower pace and feel less safe if people are moving at faster speeds through the public space.	2a 2b 2c 3	Mitigation: The Charter allows for 'safe cycling' in order to keep spaces safe and mitigate potential impacts between cyclists and other users in a space. If a space is deemed inappropriate for specific activities the charter allows for site specific regulations to be applied to a space, informed by consultation with relevant stakeholders.	+1

Gender reassignment	Positive Creating public space in London that is safer, more welcoming, and more consistently regulated is likely to have a positive impact for groups who are at higher risk of violent crime and who experience higher rates of fear of crime. For example, people who share the protected characteristic of gender reassignment are more likely to be victims of crime than some other members of the population and are more likely to avoid activities and even certain streets due to a fear of being harassed or identified as transgender. The Charter may, therefore, result in a positive impact for these groups, creating a safe secure environment that people have confidence accessing and using.	1 2a 2b 2c	Enhancement opportunity: Through the principle 'Good Stewardship' the Charter will help to ensure that new public space in London is safer and more welcoming. It clarifies that stewardship of public spaces should be informal day-to-day and considerate of all users. However, to ensure that public space is safe and secure for all users, enforcement of any restrictions on the use of the public space should be appropriate and reasonable and carried out by staff who have been appropriately trained.	+2
	By encouraging a more informal approach to stewardship the Charter will help to ensure that spaces are more welcoming to spend time in. Security guards working in a space will be required to undergo appropriate training which could include sensitivity around the impacts that LGBTQ+ people may face in the public realm and how they can help to prevent and mitigate the fear of crime experienced by this group.	2a 2b 3		+1

	Negative Not all spaces that will be covered by the Charter will be open and accessible 24/7. For example, sometimes part of a public space if not an entire space may be closed off temporarily for ticketed events to be held or have restricted opening hours due to access arrangements. These restrictions to access and use could have a negative impact on some groups for whom access to and the ability to spend time and dwell in a public space could be particularly important. For example, homeless people that may have to leave hostels or other temporary accommodation during the daytime, with evidence finding that transgender people are particularly vulnerable to homelessness.	2a 2b 2c	Mitigation: Requiring that public spaces clearly identify their opening hours will make it easier for people to work out how they can spend time in a space, e.g. if they need to move on/leave the space at a certain time.	+1
	There are a wider range of emerging smart technologies available to be deployed in the public realm, from sensors through to cameras and image processing - often using artificial intelligence. Not banning the use of smart technologies in a space could have a negative impact on some groups who are more likely to be misgendered or otherwise misidentified where the technology may include an element of automated gender recognition which may reinforce existing biases. For example, transgender and nonbinary people who do not identify with the gender that was assumed to them at birth.	1 2a	Mitigation: When using CCTV in a space landowners and managers should comply with the Surveillance Camera Commissioner's Code of Practice. As set out by the ICO , the lawful use of Live Facial Recognition (LFR) by non-law enforcement bodies – whether for safety, advertising or other purposes – has a high threshold in places where we shop, socialise or gather. Operators must show that its use is lawful, fair, necessary and proportionate, and assess the risks and potential impacts on the interests, rights and freedoms of individuals through a Data	+1

			Protection Impact Assessment. If technologies cannot meet the tests set out by the UK Information Commissioner's Office (ICO) then they should not be deployed in London's public spaces.	
Marriage and civil partnership	Positive No anticipated impacts			
	Negative No anticipated impacts			
Pregnancy and maternity	Positive Encouraging public space to be more open, accessible and inclusive is likely to mean that more people are likely to congregate in a given area and spend time in these spaces. This could more opportunities for Londoners to connect and open up opportunities for social interaction in spaces which feel safe to all users during the day time and night. This is likely to have a positive impact on people who share the protected characteristic of pregnancy and maternity. For example, people who may want stop in a space to breast feed.	1 2a 2c		+1

	Encouraging default activities such as cycling, scooting and skating to be allowed in public spaces could have a positive impact on pregnant women and mothers with children who are too old for pushchairs as it may help to enhance their mobility.	2a 2b		+1
	Space for informal play is an important element in ensuring that a public space is inclusive by meeting a need for particular groups such as children and young people for whom public spaces hold a key functional and symbolic role as 'third places' where important social interactions occur.	2b 2c 3	Enhancement opportunity: Through the principles of 'public welcome' and 'unrestricted use' the Charter will help to ensure that public spaces are welcoming and create an inclusive environment for these user groups. The guidance for unrestricted use clarifies that children's play should not be restricted to designated play areas only but enabled as an informal activity across the wider public space. The guidance is clear that particular consideration should be given to the needs of children and young people in line with the Mayor's Making London Child-Friendly report.	+2
	Negative Encouraging public spaces to be as open as possible with activities allowed as a default such as cycling and skating could have a negative impact on pregnancy and maternity as people within that group may move at a slower pace due to being pregnant	2a 2b 2c	Mitigation: The Charter allows for safe cycling in order to keep spaces safe and mitigate potential impacts between cyclists and other users. If a space is deemed inappropriate for specific activities, the charter allows for site-specific regulations to be applied to a space, informed by consultation with relevant stakeholders.	+1

	or having a pushchair or stroller with them and be more vulnerable to people moving at faster speeds.			
	Balancing the consideration of commercial events against the wider public use of a public space for certain periods of time could have a negative impact on pregnant women or mothers with young children. For example, spaces being used for commercial events could cause an obstruction to or additional travelling distances to access facilities such as toilets and amenities such as cafes which could be problematic for people who may have more difficulty navigating around barriers and obstructions such as pregnant women or parents with young children in pushchairs.	1 2a 2b 2c	Mitigation: The Charter asks that an assessment of impacts (and associated mitigation measures) relating to closures be undertaken and clearly set out in the management plan of the space, and that any closures affecting a space are announced well in advance and published in an accessible format. This will help ensure everyone can be notified and can plan for the potential disruption. This Charter requirement is likely to be helpful for people who may have difficulties navigating around 'events' such as mothers and people with young children in pushchairs.	+1
Race	Positive Evidence at a national level finds that those places with a higher proportion of Black, Asian and Minority Ethnic group residents also tend to have fewer green spaces. Areas that have almost no residents from Black, Asian and minority ethnic backgrounds have six times as many parks than those where more than 40 per cent of the population are from Black, Asian and Minority Ethnic group backgrounds. The first principle in the Charter (public welcome) seeks to ensure that public space	1 2b 2c 3		+2

	<p>in London achieves the highest levels of access and inclusion for all people. Encouraging public space to be more open, accessible and inclusive is likely to have a positive impact for Black, Asian and Minority Ethnic group Londoners as it aims to provide more opportunity for access to green spaces across London.</p>			
	<p>Evidence shows that people from Black, Asian and minority ethnic backgrounds are more likely to be victims of hate crime, feel unsafe in their local area and worried about physical attack and acquisitive crime than white people. The Charter is expected to have a positive impact for this group as it will help to make new London public spaces feel safe to all users during the daytime and at night.</p>	1 2a 2b 2c 3		+1
	<p>Evidence shows that people from Black, Asian and minority ethnic backgrounds can feel unwelcome in public spaces and can be treated differently to white people. By minimising the creation of unwarranted and unclear rules governing how people can behave in new public spaces, and by making any rules more transparent, the Charter will help to minimise the</p>	1 2a 2c	<p>Enhancement opportunity: Through the principle 'Good Stewardship' the Charter will help to ensure that new public space in London is safer and more welcoming. It clarifies that stewardship of public spaces day-to-day should not be officious but informal and friendly in manner. Both supervision and maintenance activities should be</p>	+1

	<p>likelihood of people from Black, Asian and minority ethnic backgrounds being treated differently by security staff.</p> <p>Evidence shows that people from Black backgrounds in London are more than twice as likely to be stopped and searched by the police than the average rate for all Londoners. People whose ethnicity is recorded as Asian, mixed or other are also more likely to be stopped and searched than white Londoners. While the Charter aims to make new public space more welcoming to all, it is outside the scope of the Charter to influence the methods used by the Metropolitan Police.</p>		<p>carried out in a manner that is considerate of the users of the public space. However, to ensure that public space is safe and secure for all users, the Charter makes it clear that enforcement of any restrictions on the use of the public space should be appropriate and reasonable, and carried out by staff who have undertaken appropriate training – including unconscious bias training.</p>	
	<p>London's diversity is its strength. However, the public realm in London is mainly a reflection of Victorian Britain and does not represent the achievements of women, Black, Asian and minority backgrounds, disabled and LGBTQ+ citizens. The Public London Charter encourages a greater diversity of visible representation across the public realm and the activities taking place, ensuring all users are considered, which is likely to have a positive impact on people who share the protected characteristic of race/ethnicity.</p>	2c 3		+2

	Negative There are a wider range of emerging smart technologies available to be deployed in the public realm, from sensors through to cameras and image processing - often using artificial intelligence. Not banning the use of smart technologies in a space could have a negative impact on some groups for whom the technology is more likely to inaccurately identify them. For example evidence from the USA shows that facial recognition technology has higher false positive rates for Black people, and Black women in particular than White and Asian people.	1 2a	Mitigation: When using CCTV in a space landowners and managers should comply with the Surveillance Camera Commissioner's Code of Practice. As set out by the ICO, the lawful use of Live Facial Recognition (LFR) by non-law enforcement bodies – whether for safety, advertising or other purposes – has a high threshold in places where we shop, socialise or gather. Operators must show that its use is lawful, fair, necessary and proportionate, and assess the risks and potential impacts on the interests, rights and freedoms of individuals through a Data Protection Impact Assessment. If technologies cannot meet the tests set out by the UK Information Commissioner's Office (ICO) then they should not be deployed in London's public spaces.	
Religion or belief	Positive Encouraging consistency of management and regulation in public spaces can potentially help to create safe and inclusive spaces, which is likely to have a positive impact for groups who may feel more worried about crime such as Muslim, Buddhist, Hindu, Sikh and Christian Londoners who are more likely to report feeling worried about physical attack and acquisitive crime than those with no religion.	1 2b 2c 3		+1

	Negative No anticipated impacts			
Sex	Positive Creating public space in London that are safer, more welcoming, and more consistently regulated is likely to have a positive impact for groups who are at higher risk of violent crime such as men, and for women who are more likely to feel unsafe in public spaces than men.	1 2b 2c 3	Enhancement opportunity: Through the principle 'Good Stewardship' the Charter will help to ensure that new public space in London is safer and more welcoming. It clarifies that stewardship of public spaces day-to-day should not be officious but informal and friendly in manner. Both supervision and maintenance activities should be carried out in a manner that is considerate of the users of the public space. However, to ensure that public space is safe and secure for all users, the Charter makes it clear that enforcement of any restrictions on the use of the public space should be appropriate and reasonable, and carried out by staff who have undertaken appropriate training – including unconscious bias training.	+2
	Negative There are a wider range of emerging smart technologies available to be deployed in the public realm, from sensors through to cameras and image processing - often using artificial intelligence. Not	1 2a	Mitigation: When using CCTV in a space landowners and managers should comply with the Surveillance Camera Commissioner's Code of Practice. As set out by the ICO, the lawful use of Live Facial Recognition (LFR) by non-law enforcement bodies – whether for safety, advertising or other	

	banning the use of smart technologies in a space could have a negative impact on some groups for whom the technology is more likely to inaccurately identify them. For example evidence from the USA shows that facial recognition technology has higher false positive rates for women than men.		purposes – has a high threshold in places where we shop, socialise or gather. Operators must show that its use is lawful, fair, necessary and proportionate, and assess the risks and potential impacts on the interests, rights and freedoms of individuals through a Data Protection Impact Assessment. If technologies cannot meet the tests set out by the UK Information Commissioner's Office (ICO) then they should not be deployed in London's public spaces.	
Sexual orientation	<p>Positive</p> <p>Creating public spaces (as part of the wider public realm) in London that feel safe to all users during the day time and night is likely to be beneficial for certain protected characteristic groups who are more likely to experience fear of crime such as LGBTQ+ people.</p>	1 2b 2c 3	<p>Enhancement opportunity: The Charter requires that applicants to consider how to ensure that the space will provide a safe environment during the day as well as at night. Addressing safety concerns upfront will ensure that they can be resolved or mitigated at the planning application stage, rather than leaving it to the owners or managers of a space to implement measures in a reactive manner.</p> <p>A number of the Charter principles specifically address the issue of safety and how safe management of public space is to be achieved including:</p> <p><i>'Public Welcome'</i></p>	+1

			<p><i>Public space should be managed to be welcoming to all. It should be kept clean, well maintained and appropriately lit...</i></p> <p><i>Unrestricted Use</i> <i>Public space should only have rules restricting the behaviour of the public that are essential for safe management of the space.</i></p> <p><i>Good Stewardship</i> <i>Public space should be managed on behalf of all Londoners. Day-to-day supervision should be informal, with both supervision and maintenance carried out in a manner which is considerate of all users.'</i></p>	
Negative	If spaces are closed off at certain times either due to restricted opening hours or temporarily for events, it could have a negative impact for some groups for whom access to and the ability to spend time and dwell in a space could be particularly important. For example, homeless people that may have to leave hostels or other temporary accommodation during the daytime, with evidence finding that LGBT young people are more likely to find themselves homeless	2a 2b 2c	Mitigation: Requiring that opening hours are clearly identified in public spaces will make it easier for people to work out how they can spend time in a space. For example, if they will need to move on/leave the space at a certain time. By also encouraging a more informal approach to stewardship the Charter will help to ensure that spaces are more welcoming to spend time in. Security guards working in a space will be required to undergo appropriate training –	+1

	than their non-LGBT peers, comprising up to 24% of the youth homeless population.		including unconscious bias training - which could include sensitivity around the impacts that LGBTQ+ people may face in the public realm.	
People on low incomes	Positive Encouraging public space to be more open, accessible and inclusive may increase opportunities for informal play for children. This may have a positive impact for people on low incomes as 28 per cent of children living in poverty in London are materially deprived, with no access to a range of items and experiences typical in childhood.	2a 2b		+2
	If people feel safe and welcome to spend time in a space and encourage their children to play and be active in a space this may have a positive impact on the health of children from low income families. At year 5, children living in the most deprived areas are 15 percentage points more likely to be overweight or obese than children in the least deprived areas.	1 2a 2b 2c		+1
	Negative No anticipated impacts			

Overview of equality impacts

Using your findings from the table above, summarise the impacts for each group in the table below using the scoring listed above.

	Age	Disability	Gender reassignment	Marriage and civil partnership	Pregnancy and maternity	Race	Religion and belief	Sex	Sexual Orientation	People on low incomes
Public London Charter	+2	+2	+1	No anticipated impacts	+1	+2	+1	+2	+1	+1

Amendments to the guidance

(only for review to the EqIA in the future)

Change	Reason for change
What changes have you made to the guidance as a result of this EqIA?	Why have these changes been made?
<p>The principle of Privacy and data has been updated to clarify that smart technologies must be justified. The guidance has been updated to clarify the responsibilities of land owners and managers when using CCTV in public spaces and the UK Information Commissioner's Office Opinion on the use of Live Facial Recognition in public spaces by non-law enforcement bodies. The guidance has also been updated to reference the Emerging Technology Charter and the responsibilities landowners and managers of public spaces have prior to the use of new and emerging technologies in the public realm. This will help to create a travel environment in London that feels safe to all users.</p>	<p>These changes have been made due to concerns raised in consultation responses with intrusive biometric surveillance technologies (including live facial recognition) within CCTV systems for public space.</p> <p>specific concerns were raised with the potential for facial recognition technology to misidentify transgender people</p>
<p>The principle and guidance for public welcome have been updated to reflect this with the inclusion of reference to play. The guidance for the principle of Good Stewardship has been updated to note the importance of youth engagement training given the experience of exclusion young people often face in public spaces.</p>	<p>The importance of inclusive spaces particularly for children and who can feel excluded in public spaces and not feel welcome to play</p>

Recommendation

Based your assessment, please indicate which course of action you are recommending to decision makers.

Outcome Number	Description	Mark with an X

Outcome One	No major change to the guidance is required This EqIA has not identified any potential for discrimination or negative impact, and all opportunities to advance equality have been taken.	X (all required changes have been made to the guidance)
Outcome Two	Adjustments to the guidance are required to remove barriers identified by the EqIA or better advance equality.	
Outcome Three	Justify and continue with the guidance despite having identified some potential for negative impacts or missed opportunities to advance equality.	
Outcome Four	Stop, rethink or abandon when the EqIA shows actual or potential unlawful discrimination	

Monitoring

Monitoring will take place through the London Plan Annual Monitoring Report and wider monitoring of the Mayor's other strategies as well as part of reviewing the London Plan.

Appendix A: Evidence Reference and Content

London Plan IIA (including EqIA) and Addendums

Evidence

Age

[Equality, diversity and inclusion evidence base for London](#) GLA Intelligence June 2019

The GLA projects that, in 2019, over a fifth of London's population are under 16 (1.9 million). Over two-thirds, or 6.2 million, are working age (aged between 16 and 64), and less than one in eight are 65 or over (1.1 million). Despite being the smallest age group in London's population, the number of Londoners aged 65 or over is projected to increase by 86 per cent between 2019 and 2050, faster than younger age groups. Therefore, there will be a growing need for infrastructure that supports an ageing

population, including accessible transport and housing, as well as more inclusive employment practices.

Outside of the home, the nature of London's built environment can support or form barriers to participating in city life. This is particularly relevant to older people and those with children in pushchairs, who face barriers in accessing many services and buildings because of how buildings, spaces and places are designed and managed.

Children in London are less likely than children in other parts of England to make visits to the natural environment, with 62 per cent making at least one visit a week, and 15 per cent never visit, versus 70 per cent and 12 per cent respectively at an England level. Data at a national level also reveals that some groups of children are less likely to engage with the natural environment, including children who are Black, Asian and Minority Ethnic, 56 per cent of whom make at least one visit a week compared to 74 per cent of children who are not from Black, Asian and Minority Ethnic group backgrounds. Also, children whose parents are from a lower social class, with a gap in weekly visits of 12 percentage points between the highest social grade (77 per cent) and the lowest (65 per cent).

37 per cent of London's children are living in relative poverty. Evidence at a UK level suggests that Bangladeshi and Pakistani children are at a greater risk of poverty than children in other ethnic groups. Children living in lone parent households, rented housing, households where nobody is in work or where someone is disabled are at a greater risk of poverty. Twenty-eight per cent of children living in poverty in London are materially deprived, with no access to a range of items and experiences typical in childhood.

[Is Britain Fairer? Key facts and findings on children](#), Equality and Human Rights Commission 2015

The percentage of children and young people who were obese was 28% in England, 34.4% in Wales, and 30.6% in Scotland, in 2012.

In England, 19.8% of children were living in substandard accommodation in 2011/13, compared with 30.9% in 2007/09, and the percentage of children and young people living in overcrowded accommodation fell slightly from 11.5% in 2008/09 to 11.3% in 2012/13. In Scotland, the percentage of households with children living in accommodation that did not meet the Scottish Housing Quality Standard fell from 60.2% in 2008 to 43.5% in 2013. However, there was an increase in the percentage of households with children living in overcrowded accommodation between 2008 and 2013, from 4.5% to 8.2%. There were no data available for Wales.

[Making London Child Friendly - Designing Places and Streets for Children and Young People](#), Greater London Authority January 2020

Children, particularly teenagers, are a complicated presence in public space – often stereotyped as proponents of antisocial behaviour, whilst also imposed with mobility

restrictions due to perceived dangers of public space. In London, young people's perceptions of safety in their area decrease with age. A study conducted by ZCD Architects found knife crime, strangers and adults' negative perceptions to be the most prominent factors for reluctance to go outside. Built environment interventions and policy should therefore aim to fulfil a child's right to safety, both actual and perceived.

Girls, particularly teenage girls, are more likely to have restrictions placed on their mobility freedoms. Research in different housing typologies in London found that boys are more likely to play out, visit a park and ride a bicycle alone, and have fewer concerns over safety in public spaces. Design, planning and policy must understand these social and gendered issues when considering how built environment interventions will be experienced and impact on opportunities for mobility.

Designing for independent mobility needs to create safe and accessible routes between the home and the school, as well as connections to the other places that children and young people use. 'Third places' are places used away from home and school, such as parks, recreation facilities, libraries and other forms of social infrastructure. These informal spaces, where important social interactions occur, hold a key functional and symbolic role.

Disability

[Equality, diversity and inclusion evidence base for London](#) GLA Intelligence June 2019

There are 1.3 million disabled adults in London, defined according to the Equality Act 2010 as having a physical or mental impairment that has a 'substantial' and 'long-term' negative effect on their ability to do normal daily activities. Disability is closely related to age: 13 per cent of the working-age population are disabled versus 28 per cent of people aged 65 or over.

Disabled and older Londoners face barriers in accessing London's built environment, as a result of street design and clutter, a lack of dedicated parking, and a few accessible and specialised public toilets. Older Londoners are at risk of social isolation due to physical barriers preventing them from experiencing the city in full.

[Being disabled in Britain: a journey less equal](#), Equality and Human Rights Commission 2017

UK data from 2014/15 shows that 30% of working-age adults in families where at least one member is disabled were living in households with below 60% of contemporary median income after housing costs, compared with 18% for those living in families with no disabled members. Across Great Britain, 59% of families with children, that were in

income poverty and that contained a disabled person, lived in material deprivation in 2014/15, compared with an average material deprivation rate of 20%.

["Who put that there!" The barriers to blind and partially sighted people getting out and about](#), The Royal National Institute for the Blind (RNIB), 2015

Ninety-five per cent of blind and partially sighted people have collided with an obstacle in their local neighbourhood over three months. The most common obstacles collided with are: – cars parked on pavements (70 per cent) – bins of all kinds (64 per cent) – permanent and temporary street furniture (59 per cent and 55 per cent) – advertising boards (49 per cent).

Over half of blind and partially sighted people reported that recent building developments in their area had made it either a little harder or much harder, for them to get about. Many couldn't avoid using these areas, but 40 per cent were either using the area less or avoiding it altogether. Two-thirds had not been consulted about these changes to their neighbourhoods. Few local authorities provided evidence of robust consultation policies for planning and highway disruptions.

There is a failure to provide accessible information about building and street developments. This means that blind and partially sighted people are unaware of changes being proposed, and are denied the right to object or ask for disability access to be considered.

Gender reassignment

[Is England Fairer? The state of equality and human rights 2016](#) Equality and Human Rights Commission 1 March 2016

Some people were particularly vulnerable to homelessness, including transgender people. In a 2012 survey of transgender people, 19% of the 542 participants who answered questions on their housing reported they had been homeless at some point, while 11% had been homeless more than once (McNeil et al., 2012).

A 2006 study of transgender and transsexual people's experiences of inequality and discrimination found that 73% of surveyed transgender respondents had experienced harassment in public spaces (including comments, threatening behaviour, physical abuse, verbal abuse or sexual abuse) with 10% having been victims of threatening behaviour in public spaces (Whittle et al., 2007).

In 2015, the Home Office reported a 9% rise in police recorded transgender hate crimes between 2013/14 and 2014/15. For almost all police forces (41), transgender identity hate crime was the least commonly recorded hate crime (Home Office, 2015a).

[Is Britain Fairer? Key facts and findings on transgender people](#) Equality and Human Rights Commission 2015

A UK survey of transgender people carried out in 2012 indicates that respondents avoided some activities due to a fear of being harassed or identified as transgender. Many said they avoided public toilets and gyms, and around a quarter said they avoided clothing shops, leisure facilities, clubs or social groups, public transport, travelling abroad, restaurants or bars. Those with 'clear and constant gender identities' as men avoided many more situations than those with 'clear and constant identities' as women. This was particularly the case with public toilets, with 77% of transgender men avoiding them.

LGBT in Britain- Trans report, Stonewall 2018

Trans people experience high levels of discrimination and poor treatment because of their gender identity and often change their behaviour because of it. This ranges from verbal abuse and intimidation in the street and other public spaces like toilets, to being discriminated against in shops, cafés, restaurants, bars and nightclubs. Trans people also face discrimination when using public services and when looking for a house to rent or buy.

More than two in five trans people (44 per cent) avoid certain streets altogether because they don't feel safe there as an LGBT person

Marriage or Civil Partnership

No evidence was found which is relevant to the Public London Charter.

Pregnancy and maternity

Equality, diversity and inclusion evidence base for London GLA Intelligence June 2019

Outside of the home, the nature of London's built environment can support or form barriers to participating in city life. This is particularly relevant to those with pushchairs, who face barriers in accessing many services and buildings because of how buildings, spaces and places are designed and managed.

Race

Causes and motivations of hate crime Research report 102 Equality and Human Rights Commission July 2016

There is no single type of hate crime. Research shows that some of the most common types of hate crime involve: 1. Incidents that occur during an ongoing local conflict (for example, between neighbours) that has escalated over time; 2. Incidents that form part of a targeted campaign of abuse directed against certain individuals within a neighbourhood; or 3. Incidents that occur in public spaces and are perpetrated by

individuals who feel somehow aggrieved by the victim – sometimes occurring during commercial transactions or on public transport.

A large research study recently conducted in England (The Leicester Hate Crime Project) estimated that 49% of hate crimes are committed by perpetrators who are unknown to their victim (Chakraborti et al., 2014). The authors reported that incidents commonly occurred in public spaces including streets, parks and city centres, as well as in and around public transport infrastructures (Chakraborti et al., 2014, p. 31). Yeung and Duncan (2016) reported that there has been a 37% increase in the number of race hate crimes reported to British Transport Police over the past five years.

[Equality, diversity and inclusion evidence base for London](#) GLA Intelligence June 2019

GLA projections estimate that, in 2019, 57 per cent of Londoners have a white British, white Irish or other white ethnicity, with the remaining 43 per cent having a black, Asian or minority ethnicity.

Availability of green space is lower in more deprived areas and areas with a higher proportion of Black, Asian and Minority Ethnic group residents, with children in London less likely to visit the natural environment than children elsewhere in England. LGBT, black and mixed ethnicity Londoners have a less positive attitude towards the police. Younger Londoners feel less well informed about local police activities than other groups.

[Stop and think A critical review of the use of stop and search powers in England and Wales](#), Equality and Human Rights Commission July 2010

Across England and Wales there were 22 stops and searches per 1,000 people in 2007/08. Breaking this down for the different ethnic groups reveals significantly different rates. The black population had the highest rate of stop and search at 129 per 1,000. The rate for Asian people was 40 per 1,000, and it was 17 per 1,000 for white people.

A major influence on the England and Wales figures is the high stop and search rate in London, which in 2007/08 was 60 per 1,000 people. In 2001 the London area was also home to around three-fifths of the black population aged 10 and over in England and Wales, which means that its relatively low disproportionality ratio (4.1) in fact has a big impact on this group's experience of stop and search nationwide. The large numbers of excess stops and searches conducted on ethnic minority people in London, 104,000 for the black population and 19,000 for the Asian population, are the result of large minority populations and high stop and search rates rather than exceptionally high disproportionality ratios.

[Facial Recognition Technology \(FRT\) | NIST](#) Testimony of the Director of Information at the United States Department of Commerce's Technology Laboratory National Institute of Standards and Technology to Committee on Homeland Security United States House of Representatives.

"Accuracy of face recognition algorithms is assessed by measuring the two classes of error the software can make: false positives and false negatives. A false positive means that the software wrongly considered photos of two different individuals to show the same person, while a false negative means the software failed to match two photos that, in fact, do show the same person.... Higher false positive rates in Asian and African American faces relative to those of Caucasians. There are also higher false positive rates in Native American, American Indian, Alaskan Indian and Pacific Islanders. These effects apply to most algorithms, including those developed in Europe and the United States. However, a notable exception was for some algorithms developed in Asian countries. There was no such dramatic difference in false positives in one-to-one matching between Asian and Caucasian faces for algorithms developed in Asia. While the NIST study did not explore the relationship between cause and effect, one possible connection, and area for research, is the relationship between an algorithm's performance and the data used to train the algorithm itself."

[Parks and green space: does everyone feel welcome?](#) Future of London, 2020

A roundtable discussion exploring how parks and green spaces can be made more inclusive, convened by Future of London with input from Dr Bridget Snaith, University of East London. The session found that Privately Owned Public Spaces (POPS) can be very well maintained but can also be heavily patrolled and frequently exclude people; that local Black, Asian and minority ethnic residents are not using their local green spaces, and park managers and others need to understand why; and that Black, Asian and minority ethnic people can feel unwelcome in parks and can be treated differently to white people.

[Stop and search](#), Gov.uk 2021

In London between April 2019 and March 2020, the stop and search rate for Black people was 71 for every 1,000 people. For Asian people the rate was 26 per 1,000. For mixed people it was 24 per 1,000 and for people whose ethnicity was recorded as 'other' the rate was 27 per 1,000. For white people the rate was 18 per 1,000 people. The average for all groups was 34 per 1,000 people.

Religion or belief

[Is Britain Fairer? Key facts and findings on religion or belief](#) Equality and Human Rights Commission 2015

People with no religion were less worried about crime. In England, Muslims (67.8%), Buddhists (67.1%), Hindus (66.4%), Sikhs (61.6%) and Christians (38.6%) were more likely to report feeling worried about physical attack and acquisitive crime than those with no religion (32.3%) in 2012/13.

In England, the proportion of religious minorities that reported being a victim of violent crime was higher (9.1%) than those of no religion.

People with no religion are less likely to report bad physical or mental health but are more likely to smoke or drink excessively. In England, fewer people with no religion reported very bad health (4.6%), compared with Christians (6.7%) and religious minorities (8.5%) in 2012. In Scotland during the same period, fewer people with no religion reported very bad health (6.6%), compared with Christians (9.8%).

Sex

[Is Britain Fairer? Key facts and findings on women and men](#) Equality and Human Rights Commission 2015

In England, more men reported being the victim of violent crime (3.2%) than women (2.1%) in 2012/13.

[Facial Recognition Technology \(FRT\) | NIST](#) Testimony of the Director of Information at the United States Department of Commerce's Technology Laboratory National Institute of Standards and Technology to Committee on Homeland Security United States House of Representatives.

Accuracy of face recognition algorithms is assessed by measuring the two classes of error the software can make: false positives and false negatives. A false positive means that the software wrongly considered photos of two different individuals to show the same person, while a false negative means the software failed to match two photos that, in fact, do show the same person.

False positives are higher in women than in men... The NIST study measured higher false positives rates in women, African Americans, and particularly in African American women.

[The London Tackling Violence Against Women and Girls Strategy](#) GLA March 2018
A national YouGov survey commissioned by the End Violence Against Women Coalition (EVAW) in 2016 found that 64% of women of all ages had experienced sexual harassment in public spaces, a figure that increased to 85% for women between the ages of 18-24.

For many reasons, overall, women worry about their safety in London more often than men. This perception of risk is connected to the circumstances in which the woman finds herself – for example, we know that certain environments such as empty streets and isolated transport locations can increase an individual's feelings of vulnerability.

Fewer than half of respondents (44%) in a recent online survey on TalkLondon, agreed that London is a safe place for women and girls and 68% of respondents were concerned about sexual offences on public transport. 74% of female respondents told us

they worry about their safety 'all the time' or 'sometimes', compared to 61% of male respondents.

Sexual orientation

[Equality, diversity and inclusion evidence base for London](#) GLA Intelligence June 2019

The report states that 2 per cent of adult Londoners identify as gay or lesbian, higher than the UK rate of 1.3 per cent. A further 0.6 per cent identify as bisexual and 0.6 per cent as other sexual identities. A recent survey of the UK's LGBT population found that 40 per cent had experienced an incident such as verbal harassment or physical violence because they were LGBT and that they had lower levels of life satisfaction than the general UK population.

LGBT, black and mixed ethnicity Londoners have a less positive attitude towards the police.

Note: Statistics about the size of the LGB population vary considerably and there is no single widely accepted measure. The 2017 GP Patient Survey found that 5.4% of London residents surveyed identified as Lesbian, Gay, Bisexual or 'Other' compared to a national rate of 3.3%. Figures from the 2017 Annual Population Survey provide lower estimates for London and England (3.2% and 2.6%) ([Brent Equality Profile](#), page 12).

[LGBT youth homelessness: A UK national scoping of cause, prevalence response and outcome](#). The Albert Kennedy Trust, 2015

Focuses on LGBT youth homelessness, covering prevalence, causes, and top 5 issues presented by homeless LGBT young people.

- LGBT young people are more likely to find themselves homeless than their non-LGBT peers, comprising up to 24% of the youth homeless population.
- Whilst homeless they are significantly more likely to experience targeted violence, sexual exploitation, substance misuse, and physical and mental health problems than other homeless youth.

[Is England Fairer? The state of equality and human rights 2016](#) Equality and Human Rights Commission 1 March 2016

In 2015, the Home Office reported a 22% rise in police recorded sexual orientation hate crimes between 2013/14 and 2014/15. For 38 out of 44 police forces, sexual orientation hate crime was the second most commonly recorded hate crime.

People on low incomes

Equality, diversity and inclusion evidence base for London GLA Intelligence June 2019

Availability of green space is lower in more deprived areas and areas with a higher proportion of Black, Asian and Minority Ethnic groups residents, with children in London less likely to visit the natural environment than children elsewhere in England.

Thirty-seven per cent of London's children are living in relative poverty. Evidence at a UK level suggests that Bangladeshi and Pakistani children are at a greater risk of poverty than children in other ethnic groups. Children living in lone-parent households, rented housing, households where nobody is in work or where someone is disabled are at a greater risk of poverty. Twenty-eight per cent of children living in poverty in London are materially deprived, with no access to a range of items and experiences typical in childhood.

At year 5, children living in the most deprived areas are 15 percentage points more likely to be overweight or obese than children in the least deprived areas.

Gaps in Evidence

Please detail any areas identified as requiring further data or detailed analysis.
Sex (How different genders experience public space). We will use the consultation process to help fill this gap.

Appendix B: Engagement summary

Summary of protected groups engaged

List the protected groups that have been engaged through the informal engagement - Please refer to the engagement table 2 below.

If groups are identified in the assessment who have not been previously engaged, briefly set out how they will be targeted through the formal engagement (i.e either a specific focus group meeting or invitation to community webinar event) and timeframes.

Already engaged:

1. Disabled people
2. Pregnancy and maternity
3. Age (Older people and Young people)
4. Black, Asian and Minority Ethnic people
5. People on low incomes

Through engagement events people who identify with other groups may have been engaged with, but not in a targeted way.

Engagement record

Engagement undertaken which is relevant to the EqIA for example with specific community groups, or protected characteristic groupings, or to fill identified evidence gaps.

Event details	Specific groups	Key findings
Inclusive design and access panel (IDaAP) meeting 12 June 2019 City Hall	Disabled people Older people	<p>Opportunity to engage with this group of users at an early stage of the project and get some feedback from them about their priorities and what they would like to see in a Charter.</p> <p>The following points were raised at the meeting:</p> <ul style="list-style-type: none">• The Panel made a submission for the draft LP which included points addressing shared space, management and maintenance, access for disabled people. <p>General panel comments:</p> <ul style="list-style-type: none">• Specific references to accessibility and disabled people needed so doesn't get missed

Event details	Specific groups	Key findings
		<ul style="list-style-type: none"> • Use definition of inclusive which emphasises disabled people. • Requirements of disabled people/ people with a range of impairments need to be considered • All people should be able to comfortably use areas, people aren't all the same • There should be user involvement too, disabled people should be involved later once there is a draft to look at too. • Check for other best practice examples, the Olympic park etc. • Need to consider very different requirements of people with mental health issues and neurodiverse conditions in how spaces are managed • The charter needs to be more people/ user focussed rather than legal/ ownership based • Public spaces include: cathedrals, royal parks, canal towpaths, it needs to work across a wide range of areas/ define carefully what is covered.
<p>LSE Seen and Heard Brent Youth Council 5th September 2019 LSE</p> <p>Blueprint Collective presented preliminary ideas for a multi-media Youth Charter (Brent Council) + initial ideas for a series of policy</p>	<p>Young people</p>	<ul style="list-style-type: none"> • Seen and heard projects – Blueprint collective has been working on putting together a vision and plan for a public space – representing young people/ a space for young people. • Development of a charter (as part of the seen and heard project). • Attended a conference at the GLA where a number of Charter's were presented – picked up that none of the charters were very engaging. <p>Some policy recommendations that the youth group came up with:</p> <p>Engagement</p> <ul style="list-style-type: none"> • Young adults want to get involved in shaping their physical environments <p>Design</p> <ul style="list-style-type: none"> • mapped out how people travel out the borough and where they go, to start seeing patterns • Young adults look for privacy but equally visual safety

Event details	Specific groups	Key findings
recommendations based on the findings from their workshops, GLA presented on the Public London Charter and sought feedback		<p>Infrastructure</p> <ul style="list-style-type: none"> • LSE starting to make their own google map of Privately Owned public spaces. • Designing for young adults must translate into management that allows for congregation and dwell time in the space. • Include young adults in the long term programming of these spaces. • Investment in the public realm should extend beyond the red line of the development (in the context of the rise of large scale redevelopment projects particularly in context of high social and economic inequality).
Peer Outreach Workers	Young people Black, Asian and Minority Ethnic groups	<p>Targeted engagement session during formal consultation with the Peer Outreach Workers. This was in the form of an in-depth virtual presentation and discussion forum focused on a particular stakeholder group, in this case young people.</p> <p>The following points were raised at the meeting:</p> <ul style="list-style-type: none"> • Explain what we mean by public space at the start. Some hadn't really thought what a public space was • Noted barriers e.g. not for me, territorial, can happen at the door space. Real issues. Police. Class issue • How to include people in the process • Invitation to space • A lot picked up in co-design – involving young people in the process from the beginning rather than informing them of a public space once it is already built. <p>Through this event people who identify with other groups may have been engaged with, but not in a targeted way.</p>