

Equity, Diversity and Inclusion Statement

1. Introduction

- 1.1. OPDC has prepared a Draft Industrial Supplementary Planning Document (SPD). The Industrial SPD provides additional information and detail on how OPDC will implement policies in the industrial related policies in the Local Plan. The SPD will apply generally to the whole OPDC area, with a core focus is on:
 - how industrial developments, within and outside of the Strategic Industrial Location (SIL), can be intensified and integrated within the urban fabric and demonstrate best practice from both a design perspective and a placemaking perspective.
 - how industrial developments can respond to local character, by setting out spatially specific design guidance where appropriate.
 - Development that happens on/within sites
- 1.2. OPDC recognise the important role that our organisation has in supporting equity, diversity and inclusion (EDI). EDI is an integral part of how the organisation works (see Vision and Definitions), including in our capacity as a local planning authority.
- 1.3. A key objective underpinning the vision in OPDC's EDI Strategy is to Plan for a welcoming, accessible and inclusive place. The built environment has a strong influence on our everyday lives and how it's shaped can affect how we experience the world. Therefore, the design and planning of development needs to proactively support equitable opportunities for everyone.
- 1.4. The OPDC area is one of the most richly diverse areas in the UK, home to many different communities, ethnicities and cultures. Areas in and around OPDC are also some of the most deprived areas in the country. We want to embed diverse and inclusive experiences, opinions and voices into everything we do and at all levels – working with our Board, our staff and our communities. Only by doing this, will we deliver the world class regeneration we aspire to. Table 1 sets out some key contextual statistics related to EDI. The rest of this Statement explains how EDI considerations have been embedded into the Industrial Supplementary Planning Document (SPD) from the start.

Vision

Our Equity, Diversity and Inclusion vision is to be an organisation that identifies, prioritises, enables and champions equitable opportunities for everyone – both staff and our communities – regardless of background, race, age, gender identity, gender expression, sexual orientation or ability and to ensure that the area's regeneration is accessible and inclusive which helps to create a more level playing field.

OPDC EDI Strategy 2022-2027

Definitions



Equality

Means equal rights and opportunities are afforded to all. The 2010 Equality Act protects those with protected characteristics from direct and indirect discrimination in the workplace.



Equity

Recognises that treating everyone equally has shortcomings when the playing field is not level. An equitable approach emphasises that everyone should not be treated the same, but according to their own needs.



Diversity

Refers to demographic differences of a group often at team or organisational level. Often, diversity references protected characteristics in UK law: age, disability, gender reassignment, marriage, and civil partnership pregnancy and maternity, race, religion, or belief, sex and sexual orientation.



Inclusion

Is often defined as the extent to which everyone at work, regardless of their background, identity or circumstance, feels valued, accepted and supported to succeed at work.



Intersectionality

Refers to the interconnected nature of social categorisations such as race, class, and gender as they apply to a given individual or group, regarded as creating overlapping and interdependent systems of discrimination and disadvantage.

Table 1

	Context
General	<ul style="list-style-type: none"> • Most of the area is designated as SIL and occupied by industrial uses. There are approximately 8,200 residents¹ in the OPDC area, a proportion of which live adjacent or near the designated Strategic Industrial Location, including the authorised Gypsy and Traveller site on Bashley Road, accommodating 24 pitches². • Key employment sectors include transport, wholesale and logistics, food manufacturing and creative industries. Recent trends in data centres have seen a significant uptick in demand in Park Royal, with a number of existing data centres already in the industrial estate and more in the pipeline. • There are around 43,100 jobs, including employees who work at night. Whilst business data is more limited, it is understood that a significant proportion of employees in Park Royal either live within or adjacent to the OPDC area - within a 5km radius, approximately 60% of employees come from Brent and 30% from Ealing¹. So considering the other local area statistics should help provide some insight into the employee population. • There are 1,700 businesses, the majority of which are small and micro businesses, both accounting for 97.6% of the total share³. • Sites across the industrial area are largely in private ownership, with some key landowners having an established presence. • A reduced supply of industrial land across London is contribution to higher rents, with prime industrial rents reaching as high as £28/sqft, and vacancy levels as low as 2% to 3% (as of May 2023)⁴. • 57% of the Lower Layer Super Output Areas (LSOAs) fall within the top 10% to 30% of most deprived LSOAs⁵. • The equivalised household income in the OPDC area (before housing costs) averages £33,940. This local area figure falls below the London average⁶. • Residents in the OPDC area are more likely to be unemployed, with 6.4% of residents identifying as unemployed compared to the London average of 4.8%. The proportion of economically inactive residents who suffer from long term sickness or disability is 13.5%⁷.

¹ OPDC Community Engagement Strategy 2021

² OPDC Gypsy and Traveller Accommodation Assessment October 2016

³ ONS 2022. UK Business Counts. <https://www.nomisweb.co.uk/datasets/idbrent>

⁴ Volterra and Redo. OPDC and LB Ealing Affordable Workspace Study. https://www.ealing.gov.uk/download/downloads/id/17944/affordable_workspace_study.pdf

⁵ Census 2021. Household by deprivation dimensions. <https://www.nomisweb.co.uk/datasets/c2021ts011>

⁶ ONS 2018. Income estimates for small areas, England and Wales.

<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/earningsandworkinghours/datasets/smallareaincomeestimatesformiddlelayersuperoutputareasenglandandwales>

⁷ Census 2021. Economic activity status. <https://www.nomisweb.co.uk/datasets/c2021ts066>

	<ul style="list-style-type: none"> Residents in the local area are less likely to have a degree level qualification compared to the average across London. This is expressed by 40.7% of OPDC residents holding a Level 4 qualification or above to London's average of 46.6%⁸. The health of the community in the OPDC region is broadly in line with London average levels, with childhood obesity levels either falling just below or in line⁹ and nominal lower than average life expectancy¹⁰. Access to amenities for local businesses and employees varies across the industrial estate; and the lack of provision could affect the competitive position of the area. The 2021 census revealed that 60.3% of all adults in a household within the OPDC boundary has English as a main language. 21.2% of households, however, have no adults speaking English as a main language; significantly higher than the London average which sits at just over 5%^{11,12}. <p>Local statistics based on the protected characteristics are presented in more detail below.</p>
Age	The majority of the population falls within the 25-64 age range, accounting for 57.7% of the residents within the OPDC boundary. There is also a relatively high number of young people in the OPDC area; 31.4% of which fall within the age range of 0-24. Older people 65 years and older account for a comparatively lower proportion of the population at 10.9%.
Disability	There is a marginally higher non-disabled population within the OPDC boundary (82.5%), in comparison to the national average and London, which is 81.5%. The proportion of economically inactive residents who suffer from long term sickness or disability is 13.5% ¹³ .
Gender re-assignment	Gender re-assignment data for the OPDC area has not been collected, however, the census has revealed that 0.19% of the population across the three OPDC boroughs (Ealing, Brent and Hammersmith and Fulham) identify as a different sex to what they were registered at birth ¹⁴ .
Pregnancy and maternity	In Brent and Ealing, there is a greater number of live births per 1000 residents, in comparison to both London (12.4) and England (10.3). Hammersmith and Fulham has a lower birth rate per 1000 compared to the regional averages, but is still higher than national averages ¹⁵ .

⁸ Census 2021. Highest level of qualification. <https://www.nomisweb.co.uk/census/2011/qs501ew>

⁹ Department of Health 2019. Prevalence of childhood obesity by borough. <https://data.london.gov.uk/dataset/prevalence-childhood-obesity-borough>

¹⁰ Public Health England. Local Authority Health Profiles. <https://fingertips.phe.org.uk/profile/health-profiles/data#page/1/gid/1938132701/pat/6/ati/401/are/E09000013/iid/90366/age/1/sex/1/cat/-1/ctp/-1/yrr/3/cid/4/tbm/1/page-options/car-do-0>

¹¹ Census 2021. Household Language. <https://www.nomisweb.co.uk/query/construct/summary.asp?mode=construct&version=0&dataset=2044>

¹² Census 2021. Main Language. <https://www.nomisweb.co.uk/query/construct/components/simpleapicomponent.aspx?menuopt=20430&subcomp=>

¹³ Census 2021. Economic activity status. <https://www.nomisweb.co.uk/datasets/c2021ts066>

¹⁴ Census 2021. Gender Identity: England and Wales. <https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/genderidentity/bulletins/genderidentityenglandandwales/census2021>

¹⁵ ONS 2020. Live births in England and Wales: birth rates down to local authority area. <https://www.nomisweb.co.uk/datasets/lebirthrates>

Ethnicity	The OPDC area is an ethnically diverse part of London, with a large Black and Asian community (21.7% and 21.5% respectively), with those identifying as White higher at 37.6%. Other ethnic groups, including mixed, account for around 19.3% combined ¹⁶ .
Religion or belief	Christianity is the most widely observed religion at 41.3%. Second most widely practiced religion, with 23% of residents identifying as Muslim. This share is higher than regional figures. Third most common response was no religion and there are also smaller proportions of the population who follow Hinduism, Buddhism, Judaism, Sikhism and other religion ¹⁷ .
Sex	The distribution of male and female population is almost in line across all the areas with female population accounting for a higher share at 50.9% and male at 49.1% ¹⁸ .
Sexual orientation	Around 85% of the people identify as straight or heterosexual in the OPDC area. Those who identify as gay or lesbian share the same proportion of the population as those who identify as bisexual at 1.6%. All other sexual orientations account for 0.6%. It is to be noted that since the question on sexual orientation was voluntary in nature, a significant proportion of the residents chose not to answer it (11%) ¹⁹ .
Marriage or civil partnership status ²⁰	Within the OPDC area, 52.2% have never been married or registered a civil partnership. This is higher than London and National averages which stands at 46.2% ²¹ . This is perhaps influenced by the relatively young population in the area.

¹⁶ Census 2021. Ethnicity. https://www.nomisweb.co.uk/sources/census_2021_ts

¹⁷ Census 2021. Religion. <https://www.nomisweb.co.uk/datasets/c2021ts030>

¹⁸ Census 2021. Sex. <https://www.nomisweb.co.uk/datasets/c2021ts008>

¹⁹ Census 2021. Sexual Orientation data. <https://www.nomisweb.co.uk/datasets/c2021ts077>

²⁰ the duty in respect of this last characteristic is to eliminate unlawful discrimination only

²¹ Census 2021. Legal partnership data. <https://www.nomisweb.co.uk/datasets/c2021ts002>

2. Process – Embedding EDI into the Draft Industrial Supplementary Planning Document (SPD)

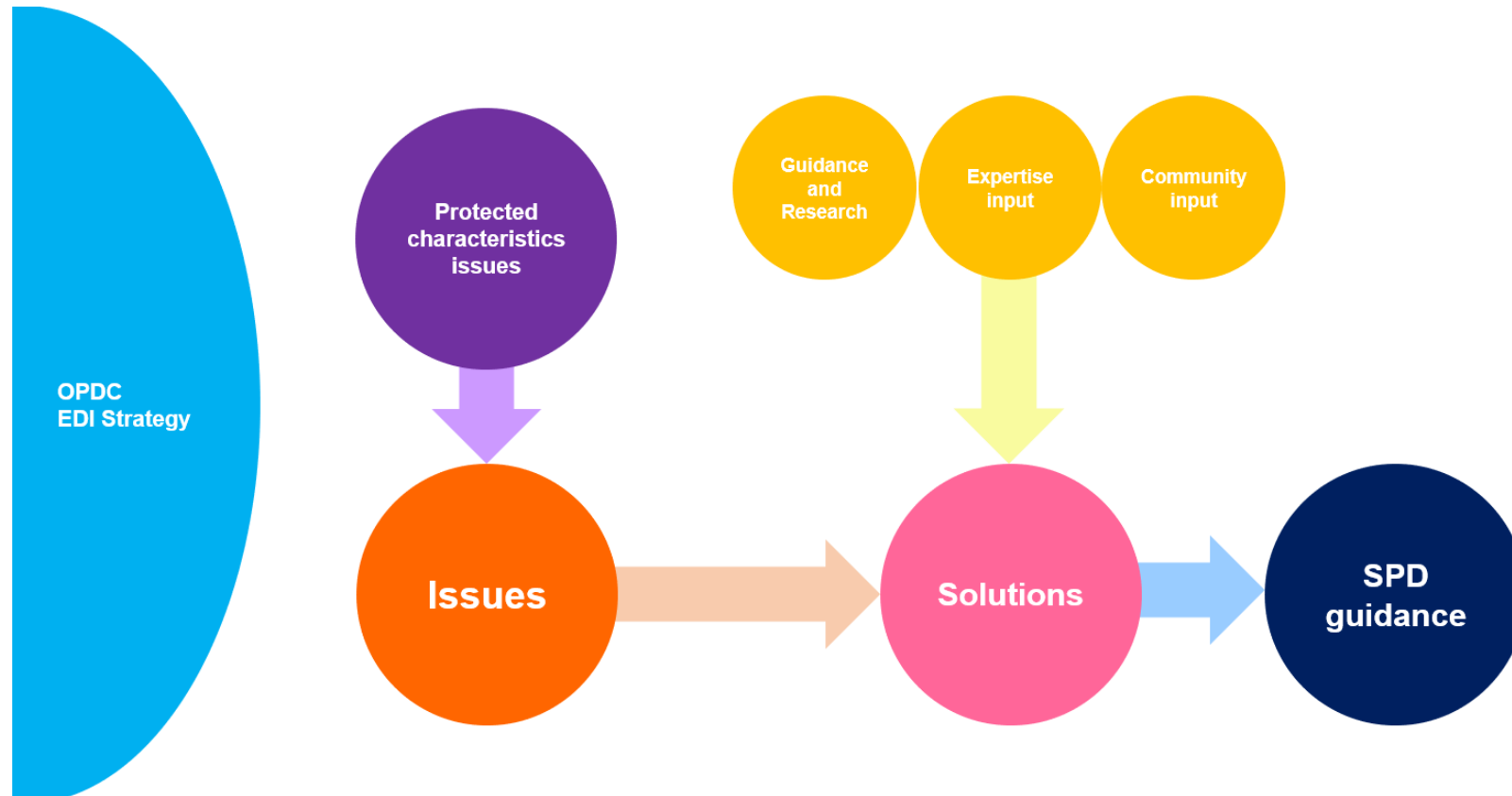


Figure 1

2.1. We have taken a multi-stepped approach (see Figure 1) to embedding EDI into the SPD. Firstly identifying protected characteristics (see paragraph 2.3) and any relevant baseline statistics (see Table 1) to form the basis for evaluating EDI, and then considering the different types of issues that these groups might face/be affected by that relate to the scope of the SPD guidance, considering relevant research and with input from staff and stakeholders. We want to continue to build on this and will publish this Statement alongside the Draft Industrial SPD for consultation to get a diverse and inclusive range of views. Further detail on each stage of this process is explained in this section.

Protected characteristics

2.2. Under the Equality Act 2010, all public sector bodies must have due regard to the need to eliminate unlawful discrimination, harassment and victimisation, and to advance equality of opportunity and foster good relations between people who share a protected characteristic and those who do not. This is known as the Public Sector Equality Duty (“PSED”).

2.3. The protected characteristics covered by the PSED are:

- a. Age
- b. Disability
- c. Gender re-assignment
- d. Pregnancy and maternity,
- e. Race,
- f. Religion or belief,
- g. Sex,
- h. Sexual orientation,
- i. Marriage or civil partnership status²²

2.4. These protected characteristics are used as the basis for our assessment. The legislation sets these out as categories but we recognise that intersectionality (see Definitions) can also exacerbate issues. We hope that by looking at all of the protected characteristics together in this way will ensure intersectional issues are also covered.

Identifying Issues and Solutions

2.5. OPDC officers have identified EDI issues and solutions using quantitative and qualitative sources, including a review of relevant literature/data/guidance and initial informal engagement through the EDI staff peer review panel, Community Review Panel and Place Review Panel.

EDI staff peer review panel - Individual lived experiences are instrumental in guiding discussions around identifying and developing solutions to issues we find in the built environment today. OPDC’s EDI strategy was developed through the lived experiences shared by staff members and an OPDC EDI peer review group is an informal and open forum that give staff an opportunity to comment on emerging work from an EDI perspective.

²² the duty in respect of this last characteristic is to eliminate unlawful discrimination only

Community Review Panel (CRG) - CRG is made up of people who live locally and members include people of different ages and backgrounds, reflecting the diverse make up of the Old Oak and Park Royal community. It plays an active role in ensuring that proposals serve the needs of the community. The group meets to discuss policy and development proposals and to give its views. These discussions are turned into a formal report and feed into decisions made by OPDC and the OPDC Planning Committee.

Place Review Panel (PRG) - PRG brings together leading practitioners across a range of different disciplines with a range of expertise of particular relevance to Old Oak and Park Royal. It provides independent, objective expert advice to the planning authority as a 'critical friend' to support delivery of high quality development, in accordance with the Mayor of London's 'Good Growth by Design' agenda.

- 2.6. We used this information to develop the Principles and Ambitions in the draft Industrial SPD, and more detail on the priority issues and proposed mitigations identified so far and how these have fed into the draft SPD is set out in section 3 of this document. We will publish this Statement alongside the Draft Industrial SPD to provide an opportunity for everyone to get involved and provide feedback on EDI issues that they think are relevant to the SPD. All responses will be considered by OPDC planning officers to help shape the final version of the Industrial SPD.
- 2.7. After the consultation, we will publish each individual comment and provide a specific officer response to each comment setting out whether or not it has resulted in a change to the SPD and the reasoning for the officer response. These will be published in a table within a Statement of Consultation and presented to both OPDC's Planning Committee and OPDC's Board for consideration in adopting the SPD.

3. Summary of EDI issues and proposed mitigation measures addressed in the SPD

			Relevant sections of SPD where this is considered/addressed <i>* denotes referencing in supporting text section</i>							
Priority issue	Group/s that might be affected	Proposed mitigation commentary	Use	Movement	Character	Built Form	Green Infrastructure	Mitigating Impacts	Environmental Sustainability	Delivery
Inclusive access and independent mobility across all modes (walking, cycling and driving)	Age	Step and obstruction-free access into and around buildings		MP1: Access						
	Disability			MP2: Onsite Cycle Parking						
	Gender re-assignment			MP3: Yards, Servicing and Parking						
	Pregnancy and maternity	Direct, convenient entrances - short distance to street		MP1: Access						
	Race									
	Religion or belief	Convenient access/short distance to priority parking and cycle parking		MP2: Onsite cycle parking						
	Sex			MP3: Yards, Servicing and Parking						
	Sexual orientation									

			Relevant sections of SPD where this is considered/addressed <i>* denotes referencing in supporting text section</i>							
Priority issue	Group/s that might be affected	Proposed mitigation commentary	Use	Movement	Character	Built Form	Green Infrastructure	Mitigating Impacts	Environmental Sustainability	Delivery
		Ensure that all access points, internal roads and footpaths meet the needs of different users minimise conflicts and reduce speeds		MP1: Access MP3: Yards, Servicing and Parking						
		Parking for different types and sizes of cycles		MP2: Onsite cycle parking Ambition MA2: Onsite Cycle Parking						
		Legible signage		MP1: Access		BFP1: Adjacencies and agent of change principle BFP5: Building lines, boundary treatments and frontages				

			Relevant sections of SPD where this is considered/addressed * denotes referencing in supporting text section							
Priority issue	Group/s that might be affected	Proposed mitigation commentary	Use	Movement	Character	Built Form	Green Infrastructure	Mitigating Impacts	Environmental Sustainability	Delivery
		Safety measures (i.e. CCTV, lighting, visibility/natural surveillance, permeability) considering those who might be working at night		MP1: Access MP2: Onsite cycle parking MP3: Yards, Servicing and Parking	ICP2: Amenities and supporting facilities for businesses and their employees	BFP1: Adjacencies and agent of change principle BFP2: Scale, massing and rooflines of new industrial buildings BFP3: Designing large footprint and taller buildings BFP5: Building lines, boundary treatments and frontages				

			Relevant sections of SPD where this is considered/addressed * denotes referencing in supporting text section							
Priority issue	Group/s that might be affected	Proposed mitigation commentary	Use	Movement	Character	Built Form	Green Infrastructure	Mitigating Impacts	Environmental Sustainability	Delivery
		Touch/tactile and auditory measures		MP1: Access						
Safety and perception of safety including at night	Age Disability Gender re-assignment Pregnancy and maternity Race Religion or belief	Lighting and CCTV within site		MP1: Access MP2: Onsite cycle parking MP3: Yards, Servicing and Parking		BFP1: Adjacencies and agent of change principle BFP5: Building lines, boundary treatments and frontages				
	Sex Sexual orientation	Design of green infrastructure and fencing does not obstruct sightlines.				BFP5: Building lines, boundary treatments and frontages	GIP2: Green roofs and boundaries			

			Relevant sections of SPD where this is considered/addressed * denotes referencing in supporting text section							
Priority issue	Group/s that might be affected	Proposed mitigation commentary	Use	Movement	Character	Built Form	Green Infrastructure	Mitigating Impacts	Environmental Sustainability	Delivery
		Safety measures (i.e. CCTV, lighting, visibility/natural surveillance, permeability) considering those who might be working at night		MP1: Access MP2: Onsite cycle parking MP3: Yards, Servicing and Parking	ICP2: Amenities and supporting facilities for businesses and their employees	BFP1: Adjacencies and agent of change principle BFP2: Scale, massing and rooflines of new industrial buildings BFP3: Designing large footprint and taller buildings BFP5: Building lines, boundary treatments and frontages				

			Relevant sections of SPD where this is considered/addressed * denotes referencing in supporting text section							
Priority issue	Group/s that might be affected	Proposed mitigation commentary	Use	Movement	Character	Built Form	Green Infrastructure	Mitigating Impacts	Environmental Sustainability	Delivery
		Legible signage		MP1: Access		BFP5: Building lines, boundary treatments and frontages				
		Familiarity and sense of community and networks			ICP2: Amenities and supporting facilities for businesses and their employees					DA1: Social value and EDI
Supporting diverse communities/identities and self-expression	All	Inclusive access to amenities			ICP2: Amenities and supporting facilities for businesses and their employees					
		The design of spaces to support amenity, inclusion and social interaction.			ICP2: Amenities and supporting facilities for businesses and their employees	BFP8: Integrating small and affordable industrial workspaces				

			Relevant sections of SPD where this is considered/addressed * denotes referencing in supporting text section							
Priority issue	Group/s that might be affected	Proposed mitigation commentary	Use	Movement	Character	Built Form	Green Infrastructure	Mitigating Impacts	Environmental Sustainability	Delivery
		Supporting conditions that support a diverse business makeup			ICP1: Respecting and Enhancing Local Character ICP2: Amenities and supporting facilities for businesses and their employees	BFP7: Designing for flexibility and resilience				
Vulnerability to impacts from emissions, nuisance and climate change	All	Reducing emissions and exposure to nuisance.				BFP1: Adjacencies and agent of change principle			MIP1: Air Quality MIA1: Air Quality MIP2: Noise and Vibration MIA2: Noise and Vibration	

			Relevant sections of SPD where this is considered/addressed * denotes referencing in supporting text section							
Priority issue	Group/s that might be affected	Proposed mitigation commentary	Use	Movement	Character	Built Form	Green Infrastructure	Mitigating Impacts	Environmental Sustainability	Delivery
		Comfort of cool with naturally shaded areas for hot spells of weather					GIP4: Trees GIA4: Trees			
		Manage potential overheating				BFP1: Adjacencies and agent of change principle			ESP2: Sustainable Construction and Materials ESA2: Sustainable Construction and Materials	
Social isolation, loneliness, amenity and wellbeing	All	The design of spaces to support amenity, inclusion and social interaction.			ICP2: Amenities and supporting facilities for businesses and their employees	BFP8: Integrating small and affordable industrial workspaces				
		Active/ancillary uses providing spaces for interaction outside of work			ICP2: Amenities and supporting facilities for businesses and their employees					

			Relevant sections of SPD where this is considered/addressed * denotes referencing in supporting text section							
Priority issue	Group/s that might be affected	Proposed mitigation commentary	Use	Movement	Character	Built Form	Green Infrastructure	Mitigating Impacts	Environmental Sustainability	Delivery
Access to services	All	Small scale town centre uses providing access to walk to services			ICP2: Amenities and supporting facilities for businesses and their employees					
		Diversity of industrial uses and typologies that support diverse business makeup and communities			ICP2: Amenities and supporting facilities for businesses and their employees	BFP7: Designing for flexibility and resilience				
Social Value and EDI taken into account as part of developing specific proposals	All	Additional measures that relate to the different roles/responsibilities and processes involved (as an employer, within the Local economy and towards the environment)								DA1: Social Value and EDI

4. Ongoing implementation as part of the planning process

- 4.1. If adopted, the guidance in the Industrial SPD will be a material consideration for the determination of planning applications alongside relevant planning policies and guidance. EDI considerations embedded in the SPD can be taken into account as part of this process.
- 4.2. Statutory public consultation is undertaken on valid planning applications to give stakeholders the opportunity to comment on proposals. As part of the decision making process for planning applications, officers also refer OPDC Planning Committee to the provisions of the Human Rights Act 1998 and Equality Act 2010 and provide commentary on how these have been taken into account.