

# Equality Impact Assessment

## 1. Service affected

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Planning policy.

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## 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.

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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.

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## 3. Potential savings

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

How will this be achieved?

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The guidance does not propose savings to budgets.

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## 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

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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. Part 1 of the Design Guide SPD (DGSPD), the Design Principles, was adopted in January 2025 and 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.

Part 2 of the Design Guide comprises four documents – Building Alterations and Extensions, Small Sites, Area Types and the Technical Handbook. These documents have been produced to provide further, more detailed and specific guidance for certain types of development common across the Borough. This guidance has been drafted to 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 documents, with a desire to ensure that 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:

- This guidance will complement the recently adopted DGSPD Part 1 – Design Principles and will also replace several outdated Bexley planning guidance documents. 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.
- Within each document, guidance is organised into different chapters which are further broken down into several sections, setting out the Council's ongoing vision for growth. Each document will be available as 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. As with the Design Principles guidance, an online, HTML version of the document will also be provided following adoption.
- 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.

<i>Equality Group</i>	<i>Bexley Statistic</i>	<i>Analysis of Impact</i>	<i>Assessment of Impact</i>
Age	Across the borough, the demographic of Bexley differs.	Potential direct and	Public space may feel unwelcoming and therefore

	<p>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.</p> <p>Bexley has an aging population; it is predicated that the population over 75 will almost double by 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>	<p>indirect impacts on protected group</p>	<p>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.</p>
<p>Disability</p>	<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>
<p>Sex</p>	<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</p>

			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.
Gender Reassignment	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 who have undergone gender reassignment.	Potential direct and indirect impacts on protected group	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 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 effect 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 householder development and common issues arising in planning applications allowing these topics to be disseminated and explored further within the Building Alterations and Extensions document.

Workshops and desktop reviews were also conducted with members of Bexley's Design Review Panel, exploring topics for inclusion across four identified common and emerging types of development in Bexley. Following these workshops, all topics discussed 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 2*, 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 2nd March - 12th April 2026 comprising online and printed publication of the draft guidance for comment from all members of the public. For the duration of the consultation period printed copies were available in all 13 borough libraries and one copy was held in the Bexley Civic Office's Contact Centre. During the consultation period, digital copies of the four documents were available alongside an online survey on the Council's Ask Bexley platform. The online survey sought feedback on the effectiveness, relevance and robustness of the guidance document through several questions. Three drop-in events were held at Erith, Sidcup and Bexleyheath libraries, allowing individuals to discuss the *Design Guide SPD Part 2* with Officers. This provided an alternative forum to online and written feedback and was dispersed throughout the borough for accessibility.

Over the course of the statutory consultation period, comments were received from statutory bodies, including TfL, Historic England and Natural England. Via the Ask Bexley platform, the Council also received responses from Bexley residents and those with interests in the borough. All comments received were analysed and considered and where appropriate, amendments to the guidance documents were proposed.

A final draft of the *Design Guide SPD Part 2* 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.

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## 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.

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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** – most relevant to the Technical Handbook, Area Types and the section on non-residential uses in Building Alterations and Extensions. In the Technical Handbook, a chapter dedicated to play space

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provision states the importance of public spaces that support the health and wellbeing of all people through incidental play features, seating, and exercise equipment. The guidance supports the development of community-focused public space that can provide a range social and cultural offerings for all ages. The Area Types guidance chapter on public realm, town and neighbourhood centres advocates for the design of places and spaces that are inclusive, open, and welcoming to all demographics. Building Alterations and Extensions speaks to the importance of level, step-free access being provided to non-residential spaces to avoid excluding users with reduced mobility.

**Disability** – most relevant to the Technical Handbook, Area Types and the section on non-residential uses in Building Alterations and Extensions. The latter and Area Types provides guidance on the design of access to commercial spaces being designed to eliminate physical barriers and minimising visual clutter to reduce potential sensory overload for those with neurodivergences and hidden disabilities. The Technical Handbook promotes the design of play features 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.

**Sex** – most relevant to the Technical Handbook and Area Types documents where the guidance places an emphasis on the importance of designing welcoming and inclusive public space for all – with a specific focus on public space, including play space, being attractive to young women and 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, where relevant 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 Area Types and commercial Alterations and Extensions guidance promotes public spaces that support the health and wellbeing of all users, suggesting the provision of incidental seating and welcoming areas, with a specific focus throughout on guidance on making space welcoming to women, girls and gender diverse people. The latter promotes the inclusion of level, step-free access that can enable easier navigation for those with a pram.

**Race** – The Area Types guidance requires developers to put in place a maintenance plan for public space that complies with the Public London Charter principles. Principles within this charter state the need for public space to “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.

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