

# Equality Impact Assessment [version 2.11]



Title: Whitehouse Street Framework	
<input type="checkbox"/> Policy <input checked="" type="checkbox"/> Strategy <input type="checkbox"/> Function <input type="checkbox"/> Service <input type="checkbox"/> Other [please state]	<input type="checkbox"/> New <input checked="" type="checkbox"/> Already exists / review <input type="checkbox"/> Changing
Directorate: Economy of Place	Lead Officer name: Maire Grogan
Service Area: Regeneration	Lead Officer role: Regeneration Manager

## Step 1: What do we want to do?

The purpose of an Equality Impact Assessment is to assist decision makers in understanding the impact of proposals as part of their duties under the Equality Act 2010. Detailed guidance to support completion can be found here [Equality Impact Assessments \(EqIA\) \(sharepoint.com\)](#).

This assessment should be started at the beginning of the process by someone with a good knowledge of the proposal and service area, and sufficient influence over the proposal. It is good practice to take a team approach to completing the equality impact assessment. Please contact the [Equality and Inclusion Team](#) early for advice and feedback.

### 1.1 What are the aims and objectives/purpose of this proposal?

Briefly explain the purpose of the proposal and why it is needed. Describe who it is aimed at and the intended aims / outcomes. Where known also summarise the key actions you plan to undertake. Please use plain English, avoiding jargon and acronyms. Equality Impact Assessments are viewed by a wide range of people including decision-makers and the wider public.

#### Overview:

The Whitehouse Street Regeneration Area has been identified as an area of Growth and Regeneration in Bristol's Local Plan. Bristol City Council, Hill Residential Limited (The Hill Group) and GHL Bedminster Bristol (Galliard Apsley) all own sites within the Whitehouse Street Regeneration Area. Spring Street is a Bristol City Council owned site within the regeneration area, that has been allocated to Goram Homes for mixed-use, residential-led development. Since 2021, Bristol City Council has been working in partnership with The Hill Group, Galliard Apsley, Goram Homes and the local community to develop the regeneration framework for Whitehouse Street.

Regeneration Frameworks integrate planning, transport and design thinking. They tend to be prepared for an area where there is a particular need to control, guide and promote change; the area is likely to be in multiple ownership, and developed in multiple stages by multiple developers over many years. A multi-disciplinary team has produced the framework:

- Strides Treglown (project management and coordination)
- Strides Treglown (urban design, architecture and master planning)
- Stantec (engineering)
- Savills (viability)
- BCC Community Development (community and stakeholder engagement)
- BCC Economic Development (community and stakeholder engagement)
- BCC External Communications and Engagement (community and stakeholder engagement)
- Cadence PR (community and stakeholder engagement)
- BCC Flood Risk (Flood Risk Assessment)
- BCC City Design (urban design assurance)

The project does not include the physical delivery of infrastructure or development of the development plots, which will be subject to their respective individual project management processes, planning applications (where relevant) and associated EQIAs and other due diligence. It is intended that this Whitehouse Street Framework project and associated project documentation, will form the basis of a detailed understanding of the project area, which will in turn inform an approach to programme management of the delivery of the Regeneration Framework.

**Project Aims:**

1. To develop a regeneration framework to guide and inform the future transformation of the area around Whitehouse Street in Bedminster from industrial warehousing into a genuinely mixed-use community of new homes, employment and community spaces.
2. Ensure regeneration contributes to meeting strategic city objectives, including:
  - a. Delivery of BCC's emerging Local Plan Review
  - b. Contributing to housing delivery targets including much needed affordable housing
  - c. Responding to COVID-19 pandemic recovery efforts (such as BCC's Economic Recovery and Renewal Strategy 2020)
  - d. Reducing socio-economic inequality (as per the project EQIA)
  - e. Responding to the climate and ecological emergencies by taking a strategic contribution to the city's 2030 targets of being a carbon neutral and climate resilient city.
  - f. Enhancing health and well-being outcomes (through healthy placemaking and urban design).
  - g. Improving connectivity and accessibility for all members of our community and taking opportunities for modal shift to sustainable transport modes
  - h. Achieving genuinely sustainable development (across all three pillars – environment, social and economic) linked with the United National Sustainability Goals and the city's One City Plan.
3. Produce a regeneration framework which can be used by landowners, BCC services, the community and other stakeholders to access funding opportunities and deliver the frameworks aspirations (other than Community Infrastructure Levy and developer contributions).
4. Gain Cabinet endorsement of the framework in March 2023, after which it will be a material consideration in the planning process and inform area-wide investment programmes and initiatives for change.
5. Secure funding from BCC's Community Infrastructure Levy in order to enable the early delivery of infrastructure to facilitate and kick-start regeneration of the site.
6. Secure funding through s106 contributions to support the delivery of initiatives to help local residents participate in the regeneration of the area and support community cohesion.

**Key actions:**

<b>Stage 0: Project set up</b>	Inception, clarification and mobilisation
<b>Stage 1: Concept stage</b>	Area, evidence base, and data review including initial early engagement with the community and stakeholders.
<b>Stage 2: Framework development stage</b>	Establishment of urban design principles and further community/stakeholder engagement to test options.
<b>Stage 3: Framework refinement and detail stage</b>	Development of preferred option and further community/stakeholder engagement for feedback
<b>Stage 4: Final Amendments and to Cabinet</b>	Final amendments to framework and endorsement at BCC Cabinet
<b>Stage 5: Community Infrastructure Fund (CIL) allocation</b>	Development, submission and securing of CIL funding to deliver early infrastructure to enable development.
<b>Stage 6: Project Close</b>	Project close

**1.2 Who will the proposal have the potential to affect?**

<input type="checkbox"/> Bristol City Council workforce	<input checked="" type="checkbox"/> Service users	<input checked="" type="checkbox"/> The wider community
<input type="checkbox"/> Commissioned services	<input checked="" type="checkbox"/> City partners / Stakeholder organisations	
Additional comments: The project will affect a wide range of stakeholders: <ul style="list-style-type: none"> <li>• Landowners, developers, and investors</li> <li>• Businesses and other lease holders</li> </ul>		

- The wider community including residents and community groups / organisations
- Creative and cultural organisations and providers
- City partners and stakeholder organisations e.g. One City Office.
- BCC services and future BCC commissioned services (as we seek to develop detailed design/deliver specific elements of the framework such as green space or transport improvements)
- Service users (e.g. where regeneration proposals may change service provision)

### 1.3 Will the proposal have an equality impact?

Could the proposal affect access levels of representation or participation in a service, or does it have the potential to change e.g. quality of life: health, education, or standard of living etc.?

If 'No' explain why you are sure there will be no equality impact, then skip steps 2-4 and request review by Equality and Inclusion Team.

If 'Yes' complete the rest of this assessment, or if you plan to complete the assessment at a later stage please state this clearly here and request review by the Equality and Inclusion Team.

**Yes**       **No**      [please select]

n/a

## Step 2: What information do we have?

### 2.1 What data or evidence is there which tells us who is, or could be affected?

Please use this section to demonstrate an understanding of who could be affected by the proposal. Include general population data where appropriate, and information about people who will be affected with particular reference to protected and other relevant characteristics: [How we measure equality and diversity \(bristol.gov.uk\)](https://www.bristol.gov.uk/what-we-do/equality-diversity)

Use one row for each evidence source and say which characteristic(s) it relates to. You can include a mix of qualitative and quantitative data e.g. from national or local research, available data or previous consultations and engagement activities.

Outline whether there is any over or under representation of equality groups within relevant services - don't forget to benchmark to the local population where appropriate. Links to available data and reports are here [Data, statistics and intelligence \(sharepoint.com\)](https://www.sharepoint.com/~/s/00000000-0000-0000-0000-000000000000/Data,%20statistics%20and%20intelligence). See also: [Bristol Open Data \(Quality of Life, Census etc.\)](#); [Joint Strategic Needs Assessment \(JSNA\)](#); [Ward Statistical Profiles](#).

For workforce / management of change proposals you will need to look at the diversity of the affected teams using available evidence such as [HR Analytics: Power BI Reports \(sharepoint.com\)](https://www.sharepoint.com/~/s/00000000-0000-0000-0000-000000000000/HR%20Analytics%3A%20Power%20BI%20Reports) which shows the diversity profile of council teams and service areas. Identify any over or under-representation compared with Bristol economically active citizens for different characteristics. Additional sources of useful workforce evidence include the [Employee Staff Survey Report](#) and [Stress Risk Assessment Form](#)

Data / Evidence Source [Include a reference where known]	Summary of what this tells us
General population (deprivation): Index of Multiple Deprivation (2019) and June 2022 Quality of Life <a href="#">data</a>	<ul style="list-style-type: none"> <li>• The framework area is within the 10-20% most deprived neighbourhoods in the country. To the north of the framework area, Redcliffe South (10 minutes' walk) is identified as being within the 10% most deprived neighbourhoods in the country.</li> <li>• To the south of the framework area (40-minute walk) and despite being a focus of growth and regeneration over recent years, South Bristol includes some of the most</li> </ul>

Data / Evidence Source [Include a reference where known]	Summary of what this tells us
	<p>deprived neighbourhoods in England (with Bristol's 10 most deprived neighbourhoods are all being in South Bristol). Though these areas generally score poorly on the IMD2019, they experience particular problems associated with employment, barriers to housing, health and disability, crime, income, and education skills and training.</p>
General population (premature mortality and life expectancy): Ward Profile <a href="#">data</a>	<ul style="list-style-type: none"> <li>• Premature mortality is significantly higher in Southville Ward (537.4 per 100,000) than Bristol's average (377.5 per 100,000)</li> <li>• Life expectancy in Southville Ward (M 75.8yrs/F 78.1yrs) is lower than Bristol's average (M 78.5yrs/F 82.7yrs)</li> </ul>
General population (crime): Ward Profile <a href="#">data</a>	<ul style="list-style-type: none"> <li>• The crime rate in Southville (156.6 per 1,000) is higher than the Bristol average (115.4 per 1,000), and recently peaked in 2019 at 391.3 per 1,000. This was more than three times Bristol's average at the time (113.5 per 1,000).</li> <li>• Conversely, crime in Windmill Hill (86.9 per 1,000) is lower than Bristol's average although has been rising steadily since 2018/19.</li> </ul>
Disability, Age, Sex (safety): June 2022 Quality of Life <a href="#">data</a>	<ul style="list-style-type: none"> <li>• Disabled people (38.6%), 16-24 year olds (41.1%) and females (45.2%) are less likely to feel safe outdoors after dark across Bristol (city average 54.4%).</li> </ul>
Age (demographics): 2021 Census <a href="#">data</a>	<ul style="list-style-type: none"> <li>• Bedminster (33.2%) and Windmill Hill (23%) MSOAs have significantly higher proportion of people aged 24-34 years than the city average (18.7%)</li> </ul>
Age (child poverty): Ward Profile <a href="#">data</a>	<ul style="list-style-type: none"> <li>• Southville Ward (7.0%) has one of the lowest rates of child poverty in Bristol with the city's average being 17.8%</li> <li>• There has been a steady reduction in child poverty in the Southville Ward since 2016</li> <li>• At 13.3%, Windmill Hill Ward's level of child poverty is more closely aligned to the city's average</li> <li>• There has been a steady increase in child poverty in Windmill Hill Ward since 2018</li> </ul>
Age (engagement): June 2022 Quality of Life <a href="#">data</a>	<ul style="list-style-type: none"> <li>• 43.6% of people age 16-24 across Bristol reported feeling that they lack the information to get involved in their community (city average across all age groups 30.8%). They are less likely to feel like they belong to their neighbourhoods (53.2% reported feeling like they belong compared to 63.1% in city overall).</li> </ul>
Age (public transport): June 2022 Quality of Life <a href="#">data</a>	<ul style="list-style-type: none"> <li>• 25.9% of people aged 16-24 in Bristol reported being limited by inaccessible public transport (city average all ages 11.8%)</li> </ul>
Race (ethnicity): 2021 Census <a href="#">data</a>	<ul style="list-style-type: none"> <li>• The ethnic mix of the area is in line with the city average with the largest ethnic group being White.</li> <li>• White residents make up 86.3% of Bedminster MSOA and 83.4% of Windmill Hill MSOA with Bristol's average being 81.1% of the population.</li> <li>• 6.6% of Bristol's population is Asian with Bedminster (4.6%) and Windmill Hill (5.0%) MSOAs maintaining similar levels of Asian residents.</li> <li>• 5.9% of Bristol's population is Black with Bedminster (3.3%) and Windmill Hill (4.7%) MSOAs maintaining similar levels of Black residents.</li> </ul>
Race (language): Ward Profile <a href="#">data</a>	<ul style="list-style-type: none"> <li>• English is not the main language for 8% of the local population which is in line with Bristol's average (8.5%)</li> </ul>

<b>Data / Evidence Source</b> [Include a reference where known]	<b>Summary of what this tells us</b>
	<ul style="list-style-type: none"> <li>The main countries of birth of the local population born outside of the UK are Pakistan, Ireland and other EU accession countries.</li> </ul>
Race (public transport): June 2022 Quality of Life <a href="#">data</a>	<ul style="list-style-type: none"> <li>13.9% of Black, Asian and minority ethnic citizens in Bristol reported being limited by inaccessible public transport (city average 11.8%) and 16.0% took the bus to work (10.7 % city average).</li> </ul>
Religion or belief: 2021 Census <a href="#">data</a>	<ul style="list-style-type: none"> <li>The proportion of residents identifying as having no religion in Bedminster (58.2%) and Windmill Hill (59.1%) MSOAs is slightly higher than Bristol's average (51.4%).</li> <li>The major religion in the area is Christian (28.5% in Bedminster MSOA / 26% in Windmill Hill MSOA / Bristol average 32.2%)</li> <li>The area is also home to a small Muslim community (Bedminster MSOA 3.4% / Windmill Hill MSOA 6.2% / Bristol average 6.7%).</li> </ul>
Sexual orientation: 2021 Census <a href="#">data</a>	<ul style="list-style-type: none"> <li>7.92% of people in Bedminster MSOA and 7.06% of people in Windmill Hill MSOA identify as Lesbian, Gay, Bisexual or Other (LGB+) which is in line with Bristol's average (6.07%)</li> </ul>
Sexual orientation (public transport): June 2022 Quality of Life <a href="#">data</a>	<ul style="list-style-type: none"> <li>19.6% of lesbian, gay and bisexual people in Bristol reported being limited by inaccessible public transport (city average 11.8%) and 11.6% reported taking the bus to work (city average 10.7%).</li> </ul>
Disability: 2021 Census <a href="#">data</a>	<ul style="list-style-type: none"> <li>In Bristol 8.3% of the population is disabled under the Equalities Act whose day-to-day activities are limited a lot, 11.1% of the population is disabled under the Equalities Act whose day-to-day activities are limited a little, and 80.6% of the population is not disabled under the Equalities Act.</li> </ul>
Disability (public transport): June 2022 Quality of Life <a href="#">data</a>	<ul style="list-style-type: none"> <li>Disabled people are less likely to be satisfied with their local bus service (42.3%), less likely to be satisfied with information on their local bus service (32.7%) and more likely to be prevented from leaving their home due to inaccessible public transport (24.7%) across the city (Bristol's averages of those indicators are 49.4%, 45.5% and 11.8% respectively)</li> </ul>
Disability (community and local area)	<ul style="list-style-type: none"> <li>62.3% of disabled people in Bristol reported feeling satisfied with their local area (city average 74.2%) and 16.3% of disabled people reported not getting involved in their community because accessibility issues stopped them from doing so (city average 1.9%). However only 30.6% of disabled people identified a lack of time to get involved in their community (city average 61.7%).</li> </ul>
Race, Age, Disability, Sexual orientation (housing): June 2022 Quality of Life <a href="#">data</a>	<ul style="list-style-type: none"> <li>BAME groups (74.4%), 16-24 yr olds (64.5%), disabled people (72.4%) and those who are LGB+ (68.65) are all less satisfied with their current accommodation than the average Bristol citizen (82.2%).</li> </ul>
<p><b>Additional comments:</b></p> <p>A series of inferences can be made from the data above:</p> <ol style="list-style-type: none"> <li>1. Relative deprivation in and surrounding the immediate framework area has reduced in recent years relative to the national picture, but it still is subject to significant deprivation. Furthermore there are severe deprivation hotspots both immediately north (Redcliffe South) and across South Bristol –</li> </ol>	

Data / Evidence Source [Include a reference where known]	Summary of what this tells us
	<p>suggesting an opportunity for the regeneration of Whitehouse Street to have a reach wider than the immediate framework area.</p> <ol style="list-style-type: none"> <li>2. Despite this, the 2019 Quality of Life Survey indicates general satisfaction with circumstance and quality of life/environment – though those with protected characteristics, particularly disabled people, have very different realities.</li> <li>3. Engagement programmes and regeneration should make particular effort to over-coming barriers to engagement and community participation for young people who feel a lesser extent of belonging to their local neighbourhood. Particular attention should also be made to engage those with disabilities.</li> <li>4. Accessibility, both in terms of quality of the built environment (buildings, streets and public spaces) and public transport, is a key factor affecting equalities groups, particularly disabled people, older people, Black, Asian and minority ethnic groups, young people and the LGBT+ community. Limitations due to inaccessible public transport appears to be an increasing problem.</li> <li>5. Disabled people consistently score significantly differently to other groups throughout the quality of life indicators, suggesting significant barriers to accessing quality life experiences and services remain.</li> <li>6. Engagement programmes should make the following reasonable adjustments to foster inclusive engagement: <ol style="list-style-type: none"> <li>a. Provide a range of engagement options including online and in-person and at different times and days to maximise participation of those who may have care responsibilities for example.</li> <li>b. Reduce barriers to engagement for young people by making activities more engaging and relevant.</li> <li>c. Possibly incentivise engagement for those who feel disenfranchised and consider specific adjustments for Disabled People e.g accessible buildings, easy read</li> <li>d. Hold engagement activities in publicly accessible spaces, in daylight hours, with convenient access to public transport connections.</li> </ol> </li> <li>7. Services designed to provide outcomes in the following would be particularly beneficial for equalities groups: <ol style="list-style-type: none"> <li>1. social interaction and integration</li> <li>2. civic participation and engagement</li> <li>3. financial planning, employability and skills</li> <li>4. public health</li> </ol> </li> </ol>

## 2.2 Do you currently monitor relevant activity by the following protected characteristics?

<input checked="" type="checkbox"/> Age	<input checked="" type="checkbox"/> Disability	<input checked="" type="checkbox"/> Gender Reassignment
<input type="checkbox"/> Marriage and Civil Partnership	<input checked="" type="checkbox"/> Pregnancy/Maternity	<input checked="" type="checkbox"/> Race
<input checked="" type="checkbox"/> Religion or Belief	<input checked="" type="checkbox"/> Sex	<input checked="" type="checkbox"/> Sexual Orientation

## 2.3 Are there any gaps in the evidence base?

Where there are gaps in the evidence, or you don't have enough information about some equality groups, include an equality action to find out in section 4.2 below. This doesn't mean that you can't complete the assessment without the information, but you need to follow up the action and if necessary, review the assessment later. If you are unable to fill in the gaps, then state this clearly with a justification.

For workforce related proposals all relevant characteristics may not be included in HR diversity reporting (e.g. pregnancy/maternity). For smaller teams diversity data may be redacted. A high proportion of not known/not disclosed may require an action to address under-reporting.

There are gaps in the diversity data for some protected characteristics at a local level where this has not historically been collected for statutory reporting e.g. sexual orientation, gender reassignment, etc. In some instances, national estimates can be used to give an indication:

- Sexual orientation: in 2018, the percentage of people who identified as lesbian or bisexual in South West England was 2.2% (an increase from 1.6% in 2014) – suggesting a growing trend as societal attitudes become more liberal. This is in line with the national average ([ONS, 2018](#)).

- Gender reassignment/gender identify: there is currently a lack of data on this protected characteristic. However the UK Government will be collecting data about gender identity in the 2021 Census ([ONS, 2018](#)).

The quality of life survey data does not provide specific information about Gender reassignment, Marriage or civil partnership status, or Pregnancy and maternity. It is not anticipated that filling these data gaps would provide any benefit over the assumptions on impact/mitigation made in Step 3.

## 2.4 How have you involved communities and groups that could be affected?

You will nearly always need to involve and consult with internal and external stakeholders during your assessment. The extent of the engagement will depend on the nature of the proposal or change. This should usually include individuals and groups representing different relevant protected characteristics. Please include details of any completed engagement and consultation and how representative this had been of Bristol's diverse communities.

Include the main findings of any engagement and consultation in Section 2.1 above.

If you are managing a workforce change process or restructure please refer to [Managing change or restructure \(sharepoint.com\)](#) for advice on consulting with employees etc. Relevant stakeholders for engagement about workforce changes may include e.g. staff-led groups and trades unions as well as affected staff.

### **Learnings from previous engagement and consultation in the locality**

#### **Bedminster Green Framework**

Of particular relevance to the Whitehouse Street Framework is the Bedminster Green Framework which has been developed and endorsed by BCC Cabinet. In the 2019 Bedminster Green Statement of Stakeholder and Consultation Involvement ([available online](#)), a range of indirect considerations which affect those with protected characteristics are noted:

- The need for a mix of housing tenures, including affordable housing options
- The need for there to be appropriate housing options for people with disabilities.
- The importance of quality and accessible public transport connections as well as active travel networks and associated infrastructure (cycle/walking paths, bike storage, places to stop and rest).
- Recognition that some people require car access (such as those with particular disabilities or caring responsibilities) – therefore it is important to not overlook this need in a drive discourage car usage.
- The need for regeneration to be supported by community infrastructure, in order to ensure access to essential services, and provide spaces for the community to come together. This will be an important aspect of reducing hostility amongst class/race/generations.

### **Whitehouse Street engagement and consultation**

#### **Stage 1**

#### **Whitehouse Street Development Community Manifesto**

Prior to the commencement of any design work Bristol City Council commissioned local community group Action Greater Bedminster to produce a 'Community Manifesto' to set out the priorities of the local community, which would then guide the development of the framework. Action Greater Bedminster partnered with Windmill Hill City Farm, The Sanctuary, Fun 4 Families and the BCC Community Development team to reach a broad range of local stakeholders. This includes equalities groups and those who do not normally engage with the development process, such as residents in hostels, visually impaired residents and foodbank users. Three community meetings were held with approximately 85 attendees, and St Mary Redcliffe Primary School received a presentation. Local interest groups who have experience in planning applications such as WHAM, BS3 Planning and TRESA, were also engaged along with anyone else who has wanted to take part in the process. Action Greater Bedminster spoke with over 15 groups including:

- Redcliffe Residents Action Group
- BS3 Planning
- TRESA (Totterdown Residents Environment and Social Action group)
- Friends of Parson Street Station
- WHAM (Windmill Hill and Malago Planning group)
- York Road residents

- Somewhere Housing Co-op
- WECIL (West of England Centre for Inclusive Living)
- Fun4Families clients
- Redcliffe Women's Voice group
- Sight Support West group
- Foodbank users at Refresh Café
- Residents at St Mungo's and Spring Street supported housing
- Young people via The Sanctuary.

### Student event

Design consultants Stride Treglown hosted an Architecture Centre 'Shape My City' education event for talented 15-18 year olds. It particularly welcomed female participants, students from BAME backgrounds and those from state schools and under-represented socio-economic groups and was attended by 20 people.

### Online interactive map and survey

220 formal comments were made on the interactive map and 207 community survey responses were received.

Breakdown of respondents:

4% aged 18-24

26 % aged 25-34

31% aged 35-44

18% aged 45-54%

10% 55-64

8% 65-74

Other respondents preferred not to say.

89% were residents

3% businesses

11% work in the area

10% are regular visitors

8% represented an interest group

52% live in Southville ward

22% live in Windmill Hill ward

5% live in Bedminster ward

5% disabled and 4% preferred not to say

58% female and 37% male

1% gone through gender reassignment, 6% prefer not to say

80% White British, 8% White Other, 5% prefer not to say

74% heterosexual, 5% Bisexual, 5% Gay, 16% either other or prefer not to say

69% no religion, 15% Christian, 1% Buddhist, 1% Muslim, 1% Pagan, 14% either other or prefer not to say

1% asylum seeker

3% given birth in last 26 weeks

### **Stage 2**

#### In-person exhibition and webinars

Two webinars (Saturday and mid-week) were held to launch stage 2 and set out the activities that would see the design team use stage 1 feedback to create concepts and options for the framework, and for these to be tested and developed with the community. Design options were presented at a local exhibition where a presentation on the history of the Whitehouse Street area by BCC Principal Historic Environment Officer was also delivered. 75 people including councillors, businesses, residents and interest groups were engaged across the online and offline events.

### **Stage 3**

#### In-person exhibition and webinar / business engagement



Feedback was received on the 'concept masterplan' developed thus far at an in-person exhibition and webinar with 72 attendees across both events. Council Officers went door to door visiting each business within the core regeneration area to ensure they were familiar with the proposals and to understand how each business is affected, what their plans are and what support they may require.

#### **Stage 4**

The final draft framework was presented during stage four and feedback sought through a formal consultation survey and at various engagement events:

##### Media engagement widely publicising the formal consultation to inform community and promote participation

Media met with the Mayor, project team and developers on site with a number of articles running online as a result: Bristol 24/7, Bristol World, BBC Bristol and Bristol Post.

##### Bespoke webinar for locals with disabilities

Session organised by BCC Community Development and held to present plans and answer specific questions related to disability and accessibility. Webinar attended by 3 people.

##### Bristol Disability Equality Commission

Meeting held with Commission rep to inform them of the formal consultation, request them to promote amongst their networks and encourage them to participate in the survey.

##### Workshop with young people

Session organised by BCC Community Development alongside Community Champion (neurodiversity lead) to present the final draft framework, support attendees to complete the survey and answer any questions. Workshop attended by 7 people.

##### Schools and youth groups

Eight local schools and youth groups were specifically contacted to inform them of the formal consultation and encourage them to publicise amongst pupils, parents, members etc.

##### Business engagement

Presentation delivered to Business West Planning and Transport Group. In addition, council officers went door to door to speak to all businesses within the core regeneration area during the formal consultation period and encouraged them to participate in the survey.

##### Walking Tours

Three walking tours were held throughout the consultation: one open to the general public, one for Ward Councillors, and one for special interest groups (TRESA, WHAM and BS3 Planning). There were 15 attendees across all events.

##### Webinar

A webinar, which was open to all, was held to present the final draft framework, answer questions and encourage those present to participate in the survey. Webinar attended by 6 people.

##### Consultation survey

143 responses were received:

Age	%	Disability	%	Sex	%	Gender reassignment	%	Pregnant or given birth within 26 weeks	%
0-10	0.00	Yes	14.29	Female	44.03	Yes	2.31	Yes	0.00
11-15	0.75	No	81.20	Male	47.01	No	91.54	No	94.66

16-17	2.26	Prefer not to say	4.51	Prefer not to say	6.72	Prefer not to say	6.15	Prefer not to say	5.34
18-24	3.01			Other	2.24				
25-34	17.29								
35-44	20.30								
45-54	16.54								
55-64	21.05								
65-74	11.28								
75-84	5.26								
85 +	0.00								
Prefer not to say	2.26								
<b>Ethnic group</b>	<b>%</b>	<b>Religion / faith</b>	<b>%</b>	<b>Sexual orientation</b>	<b>%</b>	<b>Refugee or asylum seeker</b>	<b>%</b>		
White British	75.19	No Religion	62.60	Bisexual	7.69	Yes	0.00		
White Irish	0.75	Buddhist	0.76	Gay Man	4.62	No	94.66		
White Other	7.52	Christian	23.66	Gay Woman / Lesbian	1.54	Prefer not to say	5.34		
Black /African / Caribbean / Black British	2.26	Hindu	0.00	Heterosexual / Straight	69.23				
Asian / Asian British	1.50	Jewish	0.00	Prefer not to say	14.62				
Mixed / Multi ethnic group	4.51	Muslim	0.00	Other	2.31				
Gypsy / Roma / Irish Traveller	0.00	Pagan	0.76						
Prefer not to say	7.52	Sikh	0.00						
Any other ethnic background	0.75	Prefer not to say	10.69						
		Other	1.53						

## 2.5 How will engagement with stakeholders continue?

Explain how you will continue to engage with stakeholders throughout the course of planning and delivery. Please describe where more engagement and consultation is required and set out how you intend to undertake it. Include any targeted work to seek the views of under-represented groups. If you do not intend to undertake it, please set out your justification. You can ask the Equality and Inclusion Team for help in targeting particular groups.

- The project website ([www.whitehousetstreet.com](http://www.whitehousetstreet.com)) will remain live and updated regularly as the regeneration progresses and our mailing list will remain an important communication channel.
- Through the formal consultation on the draft framework, participants were asked how they want to be kept updated as the regeneration moves into delivery, and suggestions including setting up a working group and in-public events will be discussed with stakeholders.

- Developers of individual plots will be required to conduct their own consultation and engagement when they go through the formal planning process.

### Step 3: Who might the proposal impact?

Analysis of impacts must be rigorous. Please demonstrate your analysis of any impacts of the proposal in this section, referring to evidence you have gathered above and the characteristics protected by the Equality Act 2010. Also include details of existing issues for particular groups that you are aware of and are seeking to address or mitigate through this proposal. See detailed guidance documents for advice on identifying potential impacts etc. [Equality Impact Assessments \(EqIA\) \(sharepoint.com\)](#)

#### 3.1 Does the proposal have any potentially adverse impacts on people based on their protected or other relevant characteristics?

Consider sub-categories and how people with combined characteristics (e.g. young women) might have particular needs or experience particular kinds of disadvantage.

Where mitigations indicate a follow-on action, include this in the 'Action Plan' Section 4.2 below.

#### GENERAL COMMENTS (highlight any potential issues that might impact all or many groups)

##### Regeneration v gentrification

As part of the 2019 Local Plan Review, Draft Policy DS8: Central Bedminster was consulted on (a summary of responses can be [viewed online](#)). In relation to this EQIA, comments on the draft policy noted that gentrification should be avoided and regeneration should support existing communities as a priority rather than just try to expand the city centre offer. It is noteworthy that in the 2021 Bristol Quality of Life Survey, 66.2% of respondents in Southville Ward thought their local area had changed due to gentrification compared to a city average of 31%. Across Bristol as a whole the percentage of people who feel gentrification has had a negative impact has risen from 21.4% in 2019 to 32.9% in 2021.

There is a high level of deprivation in the framework area, as well in neighbouring areas. Regeneration therefore presents an opportunity to enhance socio-economic opportunity, reduce inequality when compared to the city average, and enhance the overall quality of built environment including homes and connections to neighbouring areas so that access to services, public spaces and workplaces is maximised.

However, this opportunity will only be realised if regeneration proposals are developed with the needs and aspirations of the local community in mind, and if local communities are able to shape, take part in and reap the rewards of regeneration and local investment. An unintended negative consequence, for example, could be that regeneration provides new homes which are unaffordable for the local community, or existing places of employment are displaced, causing the local community and businesses to move to another (more affordable) part of the city, resulting in gentrification of the Whitehouse Street area. New and improved greenspaces also risk increasing problems of gentrification. Engaging local communities in the co-design of public green spaces will be important to support inclusion and feelings of local ownership.

##### Businesses and their employees

The Whitehouse Street area is currently a designated Protected Industrial and Warehousing Area and predominantly home to a number of successful light-industrial and distribution companies

#### PROTECTED CHARACTERISTICS

##### Age: Young People

Does your analysis indicate a disproportionate impact? Yes  No

##### Potential impacts:

The Whitehouse Street Regeneration Framework should facilitate positive outcomes for all age groups through the identification of age-specific needs in line with demographic projections, including a general provision of age-appropriate housing, social infrastructure as well as more accessible public spaces and services.

Particular age groups could be marginalised from the engagement and consultation process if a range of methods are not used or made accessible in various ways, particularly young people.

	There are a number of known uses within or near the project area which cater to the specific needs of young people e.g. local schools and the Scouts.
Mitigations:	Targeted engagement was conducted during stages 1 and 4 to ensure young people and organisations working with young people could influence the project.
<b>Age: Older People</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	<p>The Whitehouse Street Regeneration Framework should facilitate positive outcomes for all age groups through the identification of age-specific needs in line with demographic projections, including a general provision of age-appropriate housing, social infrastructure as well as more accessible public spaces and services.</p> <p>Particular age groups could be marginalised from the engagement and consultation process if a range of methods are not used or made accessible in various ways e.g. if delivered all online.</p>
Mitigations:	A mix of online and in-person engagement events were delivered to remove the barrier of digital exclusion.
<b>Disability</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	<p>The framework will facilitate regeneration of the area which will provide a general uplift in terms of physical accessibility (buildings and public realm design; services).</p> <p>Disability led groups could be marginalised from the engagement and consultation process if accessibility is not considered when designing the Comms &amp; Engagement Plan and engagement material. Those with visual/hearing impairments may have found it difficult to engage as provisions such as sign language interpreters / braille forms weren't provided.</p>
Mitigations:	<p>Targeted engagement was conducted during stages 1 and 4 to ensure people living with disabilities could influence the project. Those with visual/hearing impairments were however not specifically engaged although the feedback from Guide Dogs for the Blind Association has been incorporated (see 3.2 below).</p> <p>Health and disability scores poorly on the IMD 2019 so engagement with those with disabilities uncovered how regeneration can deliver a more accessible and healthier built environment.</p>
<b>Sex</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	This project is not anticipated to have any specific impact on this group.
Mitigations:	None
<b>Sexual orientation</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	No specific impact on this group. However it is noted that there has been growing trend in recent years for more hate crimes related to sexual orientation and gender identity ( <a href="#">The Guardian, 2021</a> ). Facilitating actual and perceived public safety in the design of public spaces should therefore be kept in mind.
Mitigations:	Avon & Somerset Police will be contacted as a key stakeholder to understand 'hotspots' for crime with the intention of embedding 'safety by design' as standard.
<b>Pregnancy / Maternity</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	The regeneration framework will facilitate regeneration of the area which will provide a general uplift in terms of physical accessibility (buildings and public realm design; services) e.g. for parents with prams.
Mitigations:	None
<b>Gender reassignment</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	No specific impact on this group. However it is noted that there has been growing trend in recent years for more hate crimes related to sexual orientation and gender identity ( <a href="#">The Guardian, 2021</a> ). Facilitating actual and perceived public safety in the design of public spaces should therefore be kept in mind.
Mitigations:	Avon & Somerset Police will be contacted as a key stakeholder to understand 'hotspots' for crime with the intention of embedding 'safety by design' as standard.
<b>Race</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

Potential impacts:	Regeneration can support the socio-economic prospects of all races and given Bedminster's strategic role in South Bristol with regard to the provision of services and employment opportunities, the Whitehouse Framework has the potential to make a positive impact across South-Bristol.
Mitigations:	None
<b>Religion or Belief</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	This project is not anticipated to have any specific impact on this group.
Mitigations:	None
<b>Marriage &amp; civil partnership</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	This project is not anticipated to have any specific impact on this group.
Mitigations:	None
<b>OTHER RELEVANT CHARACTERISTICS</b>	
<b>Socio-Economic (deprivation)</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	The wider Whitehouse Street area has high levels of deprivation. Gentrification of the area risks widening inequality.
Mitigations:	Engagement sought views from a wide range of stakeholders to promote inclusivity and ensure local priorities were incorporated into the framework.
<b>Carers</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Carers may be more difficult to include within engagement activities due to care responsibilities.
Mitigations:	A variety of times and methods of engagement (in person and online) was employed to include views from as wide a range of people as possible.
<b>Those without English as a first language</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Whilst the % of those without English as a first language is lower in the project area than the Bristol average, they may have been be less able to interact with the project and engagement without translation
Mitigations:	Translation of the consultation survey was available upon request, however engagement materials were unable to be translated therefore possible exclusion for this small group.
<b>Other groups</b> [Please add additional rows below to detail the impact for other relevant groups as appropriate e.g. Asylums and Refugees; Looked after Children / Care Leavers; Homelessness]	
Potential impacts:	n/a
Mitigations:	n/a

### 3.2 Does the proposal create any benefits for people based on their protected or other relevant characteristics?

Outline any potential benefits of the proposal and how they can be maximised. Identify how the proposal will support our [Public Sector Equality Duty](#) to:

- ✓ Eliminate unlawful discrimination for a protected group
- ✓ Advance equality of opportunity between people who share a protected characteristic and those who don't
- ✓ Foster good relations between people who share a protected characteristic and those who don't

It is intended that regeneration will provide a general uplift in the built and natural environment (housing, infrastructure, public spaces) and services for local people and businesses which will secure holistic socio-economic and environmental benefits for all, including those with protected characteristics (notwithstanding the risks of gentrification noted above).

**Harnessing the power of good urban design and place-making**

It is well understood that good urban design and place-making is essential to support and encourage overall quality of life including active and sustainable lifestyles, mental health, wellbeing and community cohesion, public safety, public enjoyment and satisfaction, and access to services and employment. These are cross-cutting outcomes which would benefit all residents and users of the area, but perhaps particularly those with protected characteristics who are more likely to rely on public transport systems and feel limited by accessibility in the built environment.

### **Accessibility**

Particular attention has been paid to accessibility throughout the framework with notable inclusions:

- Specific guidance on the provision of street furniture reiterating the requirement of the design of street furniture needing to take into account accessibility needs.
- Provision of cycle parking, and a specific exception to on-street parking for disabled bays.
- Specific sub-section on accessibility in the transport and movement section, picking up points on design for visually impaired people and positioning of street furniture inc. scooters etc.
- A recommendation for developers to provide accessibility audits. This was informed by some very useful feedback on the neighbouring Mead Street development from Guide Dogs for the Blind Association, a charity based within the regeneration area.
- Provided requirements on the positioning of street trees in light of accessibility needs.
- Sub-section on the provision of housing design standards, recommending 10% of dwellings to be wheelchair accessible or easily adaptable to be wheelchair accessible (Part M4(3)) and the remainder to be designed to Part M4(2) (accessible and adaptable dwellings). This goes beyond existing policy but is in line with the recommendations of the urban living SPD and in line with emerging policy.
- Identified that Langton Street Bridge needs improved accessibility.

### **Social integration and community cohesion**

Regeneration of the site is intended to achieve a balance of meeting the needs of existing local communities, while also making a strategic contribution to the city's housing needs. The project area will see an influx of new residents and businesses from elsewhere across the city. Exploring and building in means of facilitating social integration and community cohesion will be an important part of regeneration proposals.

## **Step 4: Impact**

### **4.1 How has the equality impact assessment informed or changed the proposal?**

What are the main conclusions of this assessment? Use this section to provide an overview of your findings. This summary can be included in decision pathway reports etc.

If you have identified any significant negative impacts which cannot be mitigated, provide a justification showing how the proposal is proportionate, necessary, and appropriate despite this.

#### **Summary of significant negative impacts and how they can be mitigated or justified:**

Regeneration may result in gentrification of the area if the framework and regeneration programme does not respond to the needs and aspirations of local communities including businesses. This would likely exacerbate rather than reduce socio-economic opportunity across the city. This risk is being mitigated through the design of a comprehensive engagement programme which is based on a co-design process with the local community.

#### **Summary of positive impacts / opportunities to promote the Public Sector Equality Duty:**

Regeneration and investment will result in the reduction of socio-economic inequality when compared against the city average and the overall improvement of quality of life and access to opportunity (notwithstanding risk of gentrification noted above).

The framework and regeneration programme should result in a general uplift in the built and natural environment which will have a knock-on impact on overall quality of life, accessibility and public health outcomes. Opportunities to maximise these outcomes will be explored through the framework.

Regeneration and investment in public spaces and services has the potential to foster greater social integration and community cohesion.

Note that the Whitehouse Street Framework will be a high-level document. Delivering the detail which is highlighted in this EQIA will largely come through the individual planning applications and detailed design of capital works and investment programmes following its endorsement.

## 4.2 Action Plan

Use this section to set out any actions you have identified to improve data, mitigate issues, or maximise opportunities etc. If an action is to meet the needs of a particular protected group please specify this.

Improvement / action required	Responsible Officer	Timescale
Share this EQIA with BCC Project Team for input and comment	Jamie Walling (Regeneration Officer)	By end Jan 2023
Review feedback from the formal consultation survey regarding how best to continue to engage the community once the framework has concluded, and write plan to take recommendations forward	Jamie Walling (Regeneration Officer)	By end April 2023
Collaborate with neighbouring regeneration areas to identify and maximise opportunities to improve socio-economic outcomes	Jamie Walling (Regeneration Officer)	By end Aug 2023
Maintain and strengthen links developed through this project with community organisations including equalities groups	Jamie Walling (Regeneration Officer)	On going


## 4.3 How will the impact of your proposal and actions be measured?

How will you know if you have been successful? Once the activity has been implemented this equality impact assessment should be periodically reviewed to make sure your changes have been effective your approach is still appropriate.

Further iterations of the IMD and Bristol Quality of Life Survey can be used to assess the impact of regeneration. This includes a number of social integration indicators including ‘% who agree people from different backgrounds get on well together in their neighbourhood’.

## Step 5: Review

The Equality and Inclusion Team need at least five working days to comment and feedback on your EqIA. EqIAs should only be marked as reviewed when they provide sufficient information for decision-makers on the equalities impact of the proposal. Please seek feedback and review from the [Equality and Inclusion Team](#) before requesting sign off from your Director<sup>1</sup>.

<b>Equality and Inclusion Team Review:</b> <i>Reviewed by Equality and Inclusion Team</i>	<b>Director Sign-Off:</b> 
Date: 26/01/2023	Date: 1.2.2023

<sup>1</sup> Review by the Equality and Inclusion Team confirms there is sufficient analysis for decision makers to consider the likely equality impacts at this stage. This is not an endorsement or approval of the proposal.