Planning for Equality and Diversity in London
Supplementary Planning Guidance to the London Plan

October 2007

MAYOR OF LONDON

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Mayor's foreword

London is a multicultural city of rich diversity. This diversity represents one of its greatest strengths and opportunities. However, many people from London's diverse communities are disadvantaged by where they live and by discrimination, and so are unable to contribute fully to or benefit from London's continuing development and economic growth.

This is why, in addition to my ongoing statutory duty to promote equality and social justice in the capital, I also said in the London Plan that I would produce more detailed guidance to boroughs on 'Meeting the spatial needs of London's diverse communities' (Policy 3A.14).

This supplementary planning guidance sets out some of the overarching principles that should guide planning for equality in the London context and also explores how the key spatial planning issues can impact upon equality and diversity. This SPG also examines the specific spatial needs of each of the target equality groups identified in the London Plan, and provides detailed guidance on how planning policies and proposals can be used to address them.

I commend this guidance to those working on planning issues in London and encourage those working at a local level to make use of this report to understand the interactions between equalities issues and planning and apply this knowledge in the production of emerging local development frameworks and sustainable community strategies. By targeting measures at disadvantaged groups and promoting more effective community engagement, planning for London's diverse communities will ensure wider benefits for all Londoners.

Ken Livingstone
Mayor of London

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Foreword by Director of Equalities and Policing

London is undoubtedly one of the most diverse cities in the world. This presents a unique set of opportunities and challenges, requiring unique responses at both strategic and local levels.

Mainstreaming equalities is one of the Mayor's key responses to these issues, and as a concept central to all of the work of the GLA this approach extends into the field of planning. This is why the Mayor set out a commitment in the London Plan (2004) to provide further guidance to boroughs on how to ensure that planning at the local level was addressing the needs of all of London's diverse communities.

Although the linkages are not always well publicised or understood, there are equalities considerations in almost all areas of planning, from housing provision to regeneration and access to open space. And, while the planning system itself is adapting to change by becoming more responsive to local communities, too often, groups of Londoners remain excluded from engaging with or having their needs adequately addressed by the planning process.

This guidance provides an opportunity for all those working in the planning profession to consider how they approach issues of equality and diversity as part of a wider 'spatial' rather than land-use based method. Ensuring that issues of equality and diversity are considered, and where possible, addressed, within planning contributes to successful development schemes and policies as well as making a wider contribution to community cohesion and integration.

In this European Year of Equal Opportunity for All, promoting the use of exemplar approaches to planning for equality and diversity is one of many contributions to the GLA's mainstreaming agenda. This document is unique in being the first SPG of its kind and its implementation will help to make a real difference to equalities outcomes by improving the way that London is planned for all the people who live and work here.

Lee Jasper
Director of Equalities and Policing

1 Introduction

1.1 Planning for equality

'People should be at the heart of the planning system because planning is a system to improve the quality of everyday lives'[1]

London is today one of the most ethnically diverse and multicultural cities in the world. It is also one of the wealthiest. However, as the city grows and continues to develop, some areas and some of its communities continue to experience inequalities in terms of quality of life, economic and social prosperity.

Promoting equality is one of three cross-cutting themes that the Mayor has a statutory duty to implement across all his strategies, along with promoting sustainability and the health of Londoners – with proposed new duties to address safety, climate change and health inequalities. All of these duties also have important equality implications. Because of this, equalities issues are already central to the published Mayoral strategies and policies, in line with his vision as set out below.

Mayor's Vision
The Mayor's vision is to develop London as an exemplary, sustainable world city. Based on three balanced and interlinked elements of strong and diverse economic growth; social inclusion to allow all Londoners to share in London's future success; and fundamental improvements in environmental management and use of resources. The vision is being delivered through six objectives, one of which is that London will be a fair city – showing tolerance and abolishing all forms of discrimination, where neighbourhoods and communities have a say in their own futures.

Planning has an important contribution to make to this process and the Mayor's Spatial Development Strategy, The London Plan (2004), includes policies to promote social inclusion and to help eliminate discrimination by ensuring that the spatial needs of all London's communities are addressed. It does this by identifying equality target groups and briefly highlighting some of their needs. The groups identified in the London Plan are:
· Children and young people
· Older people
· Disabled and Deaf people
· Women
· Black, Asian and minority ethnic people
· Lesbians, gay men, bisexuals and trans people.

The London Plan also recognises the differing spatial needs of immigrants, refugees and asylum seekers, Travellers and gypsies and people belonging to particular faith groups.

While identified as equality target groups, these communities actually make up the majority of Londoners[2]. It is vitally important then, that the needs of all London's diverse communities are taken into account and addressed through an inclusive and equalities-led approach to planning. To achieve this, those communities and individuals that are disadvantaged by where they live, by their ability to access services and by discrimination, must be considered as part of a wider agenda to reduce disadvantage and promote equality of opportunity for all in London.

1.2 The purpose of this SPG

This SPG provides more detailed guidance on how to implement the key London Plan policies relating to addressing the needs of London's different communities, to ensure that implementation of the London Plan achieves the Mayor's vision. As context to this guidance, the SPG also highlights the spatial impacts of wider socio-economic issues such as poverty and discrimination.

This SPG is based on the policies set out in the published London Plan (2004). However, it should be noted that the thrust of existing equalities policies have been refined and strengthened in draft Further Alterations to the London Plan (FALP), which have been consulted on and are in the process of adoption. While it is not possible to base guidance on policies that have not been formally adopted, where the FALP proposals effectively reflect a refinement of existing policy, in line with the Mayor's vision, the spirit of these policy changes have been reflected in the production of this SPG.

The equalities approach taken in the London Plan centres on two key policies - 3A.14 and 3A.15 (see below). Other policies are also relevant (such as 4B.7) and there are numerous references throughout the plan to equality issues. These are summarised in Annex 3 of the London Plan – which is reproduced in Annex 1 of this Supplementary Planning Guidance.

London Plan Policy 3A.14 Addressing the needs of London's diverse population
DPD policies should identify the needs of the diverse groups in their area. They should address the spatial needs of these groups, and ensure that they are not disadvantaged both through general policies for development and specific policies relating to the provision of social infrastructure (policy 3A.15), the public realm, inclusive design and local distinctiveness (policies 4B.4, 4B.5 and 4B.7). Existing facilities that meet the needs of particular groups should be protected and where shortfalls have been identified, policies should seek measures to address them proactively.

London Plan Policy 3A.15 Protection and enhancement of social infrastructure and community facilities
DPD policies should assess the need for social infrastructure and community facilities in their area, including children's play and recreation facilities, services for young people, older people and disabled people, as well as libraries, community halls, meeting rooms, places of worship and public toilets. Adequate provision for these facilities is particularly important in major areas of new development and regeneration. Policies should seek to ensure that appropriate facilities are provided within easy reach by walking and public transport of the population that use them. The net loss of such facilities should be resisted.

London Plan Policy 4B.7 Respect local context and communities
The Mayor will, and boroughs should, work with local communities to recognise and manage local distinctiveness ensuring proposed developments preserve or enhance local, physical, cultural, historical, environmental and economic characteristics. In doing so the requirements of policy 3A.14 should be taken into account.

The purpose of this SPG is not to be prescriptive but to give more detailed guidance on these and other policies with equalities implications, to encourage developers and planners to consider equality issues at the earliest stages of applications and in the preparation of DPDs. Preparation of supplementary planning guidance to help boroughs implement Policy 3A.14 is also a specific commitment in the London Plan.

A draft of this SPG was consulted on and is now a material consideration when determining planning applications, having substantial weight as a formal supplement to the London Plan.

1.3 Who this SPG is for

This SPG is particularly aimed at local authority planners responsible for producing development plan documents as well as officers preparing sustainable community strategies; regeneration and community safety plans. It is also a resource for considering the spatial needs of certain groups.

It provides guidance on some of the tools available for addressing equality issues, such as Equality Impact Assessments and it explains the principles of equality concepts in planning.

Implementation Points also provide guidance for developers, architects, urban designers, facilities managers and others with responsibility for London's built environment on how to take equalities issues into consideration.

1.4 How this SPG is structured

The approach to addressing the spatial needs of London's diverse population in this draft SPG is fourfold. The first section is formed by this introduction, with the remainder of the document as follows:

Part 2: Promoting equality and diversity in planning processes – deals with the legislative context to planning for equality, explores equality implications in the new planning system and explains some of the tools that are already available to address equality issues in planning - such as Equality Impact Assessments and Sustainability Appraisals - and sets out processes to ensure effective consultation and engagement with equality groups.

Part 3: The key spatial and social issues for London – introduces the complex relationship between spatial planning and wider social issues in the London context of diversity and multiculturalism. It explores how spatial planning can be used to help address inequality and disadvantage and promote community cohesion and identifies key spatial issues for achieving this. These core issues are explored and implementation points are highlighted to provide guidance.

Part 4: Addressing the spatial needs of target equality groups – considers the key spatial issues faced by each of the equality groups as a result of wider social issues. This section sets out where planning can make a positive impact, with implementation points where appropriate and signposts to further information. The list of equality groups is not intended to be exhaustive and boroughs are encouraged to develop the strategic analysis given here at a local level in their Development Plan Documents (DPDs).

1.5   How the guidance should be used

The guidance is designed to complement work already carried out by many London boroughs in considering equality issues in the production of their DPDs and also to provide greater consistency across London when tackling equalities issues. In order to prevent duplication of work already produced, the SPG includes signposts to additional documents that may assist boroughs in addressing the needs of their diverse communities.

The SPG highlights the fact that equality of opportunity is beneficial to all. For example, designing and managing environments that are accessible to all is a key factor in ensuring equality of access to the built environment. The Mayor believes that it is at the very initial stages of development and policy proposals that such issues need to be tackled. This SPG should therefore be used not just at the stage of considering planning applications, but in pre-application discussions and in the drafting of development frameworks and planning briefs.

1.6   Monitoring equalities issues in planning

Though London's ever-increasing diversity is well acknowledged as an opportunity, the mechanisms to ensure equality of opportunity for all are less than effective. This SPG stresses three overarching themes to tackle this:

· the collection of adequate and relevant data
· the identification of key spatial issues and different ways of addressing them and
· the need for effective and sustained two-way communication with communities.

2 Promoting equality and diversity in the planning process

This part of the SPG deals with:
- The legislative context to planning for equality
- The new planning system and equality issues
- Tools that are already available to address equality issues in planning – Equality Impact Assessments, Sustainability Appraisals
- Processes to ensure effective consultation and engagement with equality groups.

2.1 The legislative context to planning for equality groups

There is a complex historical background to equalities legislation in the UK. Over the last 40 years an extensive body of legislation has been passed and further amended to try and address the disadvantage and discrimination experienced by certain groups. The GLA has a statutory duty to promote equalities in its work (as set out in the GLA Act 2000) and has defined equality target groups as a focus for its equality work, which emphasises the importance of mainstreaming equalities issues (see Annex 2 for further information).

The legislation aimed at addressing discrimination covers a much wider remit than planning alone and places many duties on local authorities as part of their corporate role. However, the corporate duty impacts upon all areas of work. The key legislation, which sets out the corporate duties of local authorities with respect to equalities issues and provides the context to planning effectively for these groups, is set out below:

- The Equal Pay Act 1970, 1975, Amendment 1984
- Race Relations Act 1976 Amendment 2000. Amendment Regulations 2003
- Sex Discrimination Act 1975 Amendment 1982
- Employment Act 1989
- Race Relations (Remedies) Act 1994
- The Disability Discrimination Act 1995
- Employment Rights Act 1996
- Asylum and Immigration Act 1996
- Protection from Harassment Act 1997
- The Human Rights Act 1998
- Disability Discrimination Act 2005
- Immigration and Asylum Act 1999
- Employment Equality (Religion or Belief) Regulations 2003
- Employment Equality (Sexual Orientation) Regulations 2003
- Children Act 2004
- The Gender Recognition Act 2004
- Civil Partnership Act 2004
- Equality Act 2006 (Protection under provision of goods and services)
- Employment Equality (Age) Regulations 2006

More recent developments have widened the scope of legislative requirements when it comes to taking into account the spatial needs of specific groups. These developments include recent legal changes regarding lesbian, gay, bisexual and trans people, such as the abolition of Section 28 of the Local Government Act 1988 which prohibited local authorities from intentionally promoting homosexuality or publishing material with the intention of promoting homosexuality, the equalisation of the age of consent and the Civil Partnership and Gender Recognition Acts. The Equality Act (Sexual Orientation) Regulations 2007 now outlaws discrimination against lesbians, gay men and bisexual people in the provision of goods and services.

The Equality Act 2006 made provisions to dissolve the Equal Opportunities Commission, the Commission for Racial Equality and the Disability Rights Commission and to establish an overarching Commission for Equality and Human Rights (CEHR) by October 2007. The new Commission for Equality and Human Rights (CEHR) is expected to champion equality, diversity, and human rights as defining values of society, encouraging all institutions to operate for the benefit of every individual and will provide the future overarching guide for equalities legislation.

A Discrimination Law Review Green Paper 'A Framework for Fairness: Proposals for a Single Equality Bill for Great Britain', was published for consultation in June 2007. It is hoped this Single Equality Bill will make some steps towards tackling ongoing discrimination experienced by all equalities groups by setting out proposals for simplifying, modernising and making more effective the framework of discrimination law. The Green Paper notes that while discrimination law is one of the foundation stones of a fairer society, law alone cannot deliver equality. The law needs to work alongside effective social policy measures and strong institutions to promote a culture of fairness, participation for all and respect for each other's rights.

Signpost
Commission for Equality and Human Rights (CEHR)
http://www.cehr.org.uk/

Disability Rights Commission http://www.drc-gb.org/

The Equal Opportunities Commission
http://www.eoc.org.uk/Default.aspx?page=15016

Communities and Local Government, Discrimination Law Review,
A Framework for Fairness: Proposals for a Single Equality Bill for Great
Britain, A consultation paper, June 2007
http://www.communities.gov.uk/pub/244/AFrameworkforFairness
Consultation_id1511244.pdf

2.2 Equality in the new planning system

The changes to the planning system in the UK as a result of the Planning
and Compulsory Purchase Act (2004) have also had far reaching equalities
implications. The move away from a traditional land-use based system to
spatial planning brings together and integrates policies for the development
and use of land with other policies and programmes which influence the
nature of places and how they function. This includes policies that can
impact on land use by influencing the demands on, or needs for,
development, but which are not capable of being delivered solely or mainly
through the granting or refusal of planning permission and which may be
implemented by other means.

The requirement for local authorities to engage more effectively with local
communities as part of the act, in producing their Statement of Community
Involvement enables them to ensure that issues of diversity and equality are
central to the new planning process. This interaction will allow the positive
effects of development planning to be felt more widely, which will empower
local communities and help them to remain engaged in the issues and
developments that impact on their lives.

There has been an increasing focus on Community Strategies, and how issues
identified in this process can effectively feed into and be implemented across
wider policy areas, including spatial planning. The recent Local Government
White Paper: 'Creating Strong and Prosperous Communities' emphasises the
production of Sustainable Community Strategies, which will be linked to the
objectives and delivery plans of the Local Strategic Partnerships. Measures
such as these encourage the integration of spatial and service planning and
ensure that the needs of local communities are central to the way that both
plans and services are conceived and delivered.

2.3 Planning and discrimination

Despite legislative change aimed at improving equality in the UK, ageism,
homophobia, racism, religious intolerance, sexism and discrimination towards
disabled people have not been completely eradicated. Nor have their
negative social and economic effects. While there have been some positive
steps, the drivers for changing social attitudes towards equalities groups are
many and varied and achieving equality for all is a complex process[3].

Planning can make an important contribution to this social change by minimising some of the more indirect forms of discrimination that continue to occur in the planning process – especially around engagement and participation. Failing to engage with communities over plans that involve them or displaying plans for development in formats or locations that are inaccessible are good examples of discrimination that can be easily eliminated[4]. Discrimination in planning *outcomes* is another element to the problem – such as the poor location of affordable homes or the lack of or inappropriate provision of facilities for local communities.

These are difficult issues to address and there is confusion as to whether gender, ethnicity, age, disability and sexual orientation are issues to be taken into consideration when producing planning documents or making planning decisions. Planning is often viewed as a strictly land-use process where questions of lawfulness can limit the extent to which wider equality considerations can be addressed. Planning law is often regarded as a neutral process that regulates land use without prejudice in the public interest e.g. the granting of planning permissions is a land use decision and should not be person specific, and certainly not 'biased' to help particular groups. However, a fundamental doctrine of mainstreaming diversity and equality issues is that in order to treat individuals and/or groups equally you may have to treat them differently.

Within planning there are limitations as to how far this concept can be taken, but the spatial planning system presents opportunities to link wider corporate equalities issues to ensure that the needs of the target equality groups are considered within the planning process. Instead of being the frontline body to address diversity and equalities issues at large through strategic land use planning, local authority planning departments could contribute more to diversity and equality issues by offering a spatial context in which wider initiatives could be implemented.

The planning system has responded to legislative changes relating to the reduction of disability-based discrimination in planning. The Disability Rights Commission has produced guidance that explains the new Disability Equality Duties introduced by the Disability Discrimination Act 2005 (DDA 05), which amended the Disability Discrimination Act 1995 (DDA). It takes a practical look at what the promotion of disability equality means in relation to planning, building control and highway authorities. It also explains the new non-discrimination requirements as they relate to these public functions.

This guidance and the Accessible London SPG should also be referred to in the production of DPDs. This SPG aims to highlight and suggest ways for

improving planning outcomes and reducing discrimination across all equalities strands.

SPG Implementation Point 2a: Promoting equality in planning processes
Boroughs are recommended to have policies in place so that planning applications can be refused, amended or approved with conditions if issues of diversity and equality have not been properly addressed. In addition, boroughs are advised also to consider setting out further information on planning for diversity and equality in detailed guidance documents which support their planning policies.

Signpost

Planning and Diversity: Research into Policies and Procedures, ODPM (2004) http://www.communities.gov.uk/pub/400/DiversityandPlanning ResearchReportonPlanningPoliciesandPracticePDF359Kb_id1145400.pdf

Diversity and Equality in Planning: A good practice guide, ODPM (2005) http://www.communities.gov.uk/pub/506/DiversityandEqualityinPlanning AgoodpracticeguidePDF1415Kb_id1144506.pdf

A guide to the Disability Equality Duty and Disability Discrimination Act 2005 for local authority departments responsible for planning, design and management of the built environment and streets, Disability Rights Commission, August 2006 http://www.drc.org.uk/pdf/Highways_and_ planning_guidance_August06.pdf

Accessible London - Supplementary Planning Guidance, Mayor of London, 2004

2.4   Understanding local communities

In a city as diverse as London it is essential that an accurate picture of the population involved is created when considering approaches to promote equality and diversity in planning. The 'local knowledge, local initiative' approach is especially important for tackling certain diversity and equality issues within a particular borough.

Effective provision for communities cannot be made if their specific needs have not been recognised and understood. A variety of sources can be used to do this and local authorities in London should aim to maintain as up-to-date a picture of the local populations as possible. This is especially important in those areas of London which are experiencing higher levels of

migration inflows – to allow the needs of these new arrivals to be assessed and met. Where data may not be available for groups such as refugees, closer engagement with those communities becomes even more crucial.

In addition to collecting and publishing this information, it is also important to ensure that progress on these issues is monitored effectively.

SPG Implementation Point 2b: Baseline statistics
Boroughs are recommended to maintain accurate data on the make-up of local populations to allow for analysis which impacts in a positive way upon planning practices. Boroughs have the responsibility to produce Community Strategies that provide baseline information on the population's characteristics, for example age, gender and ethnic composition. These statistics should be used when developing Local Development Framework policies, regeneration plans and community safety plans, to ensure local service provision reflects the needs of the local residents.

Boroughs are advised also to identify the relevant issues facing different target equality groups based on their own data and the strategic issues in the sections that follow. These should be cross-referenced to wider equality issues and to Community Strategies.

SPG Implementation Point 2c: Monitoring progress on equalities planning
Boroughs are advised to develop and implement systems for monitoring outcomes for target equality groups from the planning process. Outcomes should be published on a regular basis either as part of annual monitoring reports or as a section on progress made in implementing equalities schemes.

Signpost:
The Data Management and Analysis Group (DMAG) have produced a series of briefings since 2002, covering all aspects of its work, which includes the latest demographic projections and analysis: http://www.london.gov.uk/gla/publications/factsandfigures.jsp

Focus on London 2007 provides a statistical portrait of some of the key matters affecting London. This edition of Focus on London has been jointly produced by the Greater London Authority (GLA) and the Office for National Statistics (ONS) and brings together a wide range of demographic, social and economic datasets to provide a broad picture of London: http://www.statistics.gov.uk/focuson/London/

2.5 Effective community engagement

Equalities groups are often excluded from consultation because they are considered to be 'hard to reach'. This further contributes to their social exclusion. However, proactive engagement by local authorities to inform the planning process can play a significant role in helping to eliminate inequalities in engagement.

Planning Policy Statement 1: Creating Sustainable Communities sets the framework for boroughs to produce Local Development Frameworks (LDFs) that promote equality of opportunity as a cross cutting theme. Paragraph 1.37 states that effective community involvement requires processes for:

· Notifying and informing communities about policies and proposals in good time.
· Enabling communities to put forward their own ideas and participate in developing proposals and options, rather than simply comment once these are fixed.
· Consultation on formal proposals.
· Feedback[5].

It is important to consider the views of local people in the production of Development Plan Documents. The Diversity and Equality in Planning Best Practice Guide by the ODPM (2005) sets out some principles for effective community engagement. These Principles for Community Involvement are reproduced, below[6]:

· Fit for purpose – appropriate to the level of the plan, the authority's circumstances and the needs of the community;
· Front-loading of involvement – opportunities for participation in identifying issues and debating options from the earliest stages;
· Methods used to encourage involvement and participation should be relevant to people's experience, a genuine dialogue is to be established and maintained.
· Clearly articulated opportunities for continuing involvement.
· There should be a continuous programme, not a series of disjointed one-off steps to avoid a "tick box mentality".
· Transparency and accessibility – a clear process and ground rules. Involvement should extend beyond those who are familiar with the system, and should extend to difficult to reach groups.
· Planning for involvement – the process needs to be planned, and thought should be given to how community involvement in planning can best fit with other involvement processes, particularly the Community Strategies.

Inaccessible, technical language and the lack of information provided by boroughs in regards to planning issues can have the effect of deepening the extent of discrimination and inequality within the planning sector. Although many efforts are made to consult the local community, these are often seen as tokenistic gestures whereby voices are heard but not listened to. For example, consultation methods in the planning process that rely mainly on the written form are not appropriate for engaging with all communities. Some people will not want to offer written comment but would be happy to participate in a public meeting or workshop and not all groups have the same levels of IT access or literacy to access plans and documents. Consideration should be given to alternative consultation methods and methods by which consultations are publicised. There also needs to be a greater focus on consultation methods that are age appropriate (i.e. for children and young people) and in different languages not only in the written form to engage diverse populations who may not speak or read English or read material in their own language.

Consultation should take place in an environment that makes people feel comfortable – e.g. their local community centre. Feedback is also important as people need to know that their opinions have been heard and given due consideration, even if their ideas are not reflected in final proposals. Feedback is critical to ensure that local people contribute to the planning decisions that affect them on an ongoing basis.

SPG Implementation Point 2d: Identifying the issues in Community Involvement
Boroughs, developers and their agents are asked to consult with, and engage, local communities including people from the target groups covered in this SPG throughout the plan making process and in decision-making.

SPG Implementation Point 2e: Community Communication
Community based groups are often the first place that people will visit to discuss any problems that they may be experiencing and boroughs are asked to take advantage of this resource when consulting on their Development Plan Documents.

A major obstacle to community engagement within the planning process is that those affected by planning applications in their local area are not aware of their rights and do not understand the planning process. Outreach work by planning officers would help to get the community engaged and to simplify the planning process and may provide specific links between planning departments and community groups. The review and development of sustainable community strategies is one of the ways that interaction between planning departments and community

organisations can be encouraged. Statements of Community Involvement are also central to facilitating this relationship between the community and the local authority and these should be kept up to-date.

Engaging with specific groups

Many local groups exist, who are experts in their own needs and have valuable contributions to make to the planning process. These groups may be linked to national bodies or be entirely local in their make-up, examples include organisations such as Age Concern and the Greater London Forum for Older People who are useful contacts for understanding the needs of older people.

Disabled people are keen to get involved in the planning system to help ensure that their access needs are being effectively addressed. They are the experts in their own access needs and many groups have developed expertise in planning and access issues. There are a number of active local access groups in London and boroughs should work with and support these groups and involve them at an early stage in the development process - at a stage when their views on the design of the scheme can be taken into account. The London Access Forum is a network of local access groups in London. Contact details for local groups can be obtained from the GLA or via www.accessgroupresources.co.uk

Children and young people need to be engaged in the shaping of their environments and this also helps to generate greater respect for it. The Office of the Children's Commissioner is an independent organisation that was set up by Parliament as part of the Children Act 2004. It looks after the interests of and acts as a voice for children and young people and as part of the Children and Young People's Plans, encourages active engagement with children and young people. For this, it is necessary to develop appropriate and effective methods of engagement and the National Youth Agency has developed the Hear by Right standards framework for organisations across all sectors to assess and improve practice and policy on the active involvement of children and young people.

In a multicultural society, it is important to employ the full range of community consultation and engagement techniques that are increasingly becoming available (including citizen's juries, community planning forums and image theatres).

Signposts

Planning and engaging with intercultural communities: Building the knowledge and skills base, Academy for Sustainable Communities, November 2006 http://www.ascskills.org.uk/download/general/intercultural_communities.pdf

National Youth Agency, Hear By Right
http://www.nya.org.uk/Templates/internal.asp?NodeID=90031

Access group resources www.accessresources.co.uk

Regeneration and urban renewal
Regeneration and urban renewal are processes where local residents and community groups should have an active role in the development of their neighbourhoods. This is particularly important given the context of growth in London and the proposed levels of urban development that are likely to take place over the next few years. For more information please see Section 3.1: Social and spatial issues in this document.

Signposts
Planning for Real uses simple models as a focus for people to put forward and prioritise ideas on how their area can be improved. It is a highly visible, hands-on community development and empowerment tool, which people of all abilities and backgrounds find easy and enjoyable to engage in. http://www.nif.co.uk/planningforreal/

Prove It! Is a method to evaluate community regeneration projects that engages all those who are interested in improving their surroundings. Developed by the New Economics Foundation in partnership with Groundwork and Barclays plc, the principle behind Prove It! is to make data collection part of the process of regeneration itself. http://www.neweconomics.org/gen/newways_proveit.aspx

2.6   Equality Impact Assessments

Sustainability Appraisals (SAs) must be carried out on both regional and local planning policies and Environmental Impact Assessments (EIAs) must be carried out on large projects and planning applications. Both SAs and EIAs are statutory assessments and contain some provision for equalities issues, however Equality Impact Assessments (EqIAs) offer a more detailed look at the implications of development plans and policies on diversity and equality for the target groups. They also fulfil local authorities duties to carry out race, disability and gender impact assessments as required under the Race Relations (Amendment) Act 2000, the Disability Discrimination Act 2005 and the Equality Act 2006 respectively. EqIAs should be carried out alongside the development of the document or project being assessed. In addition to the traditional equalities groups, EqIAs can be expanded to cover social inclusion issues such as impact on family poverty, on refugees and on the traveller community.

EqIAs can be used to provide a structured approach to ensure policies, strategies and projects developed and implemented through the planning process contribute to improving the lives of London's communities. They systematically take into account the particular needs of each target equality group and are similar to doing a risk assessment. When carrying out an EqIA, the project team first gathers evidence on needs and priorities and the likely effects of the policy, strategy or project. The project team then looks at ways to:

· minimise known unintended and unjustifiable negative impacts

· fill gaps in understanding about needs

· find evidence to predict what will actually happen

· maximise positive outcomes.

This ensures that equalities considerations are built into the policy or project development process, and avoids a tick box approach to dealing with these sensitive issues. There is scope to use the EqIA process more extensively in dealing with strategic or major planning applications. By asking developers to commission independent EqIAs on major development schemes[7], it is possible to rectify any negative impacts that might arise and maximise positive impacts for all groups. Further guidance on how to carry out EqIAs as well as examples of completed EqIAs can be found on the GLA website

Signposts
How to do Equality Impact Assessments, GLA
http://www.london.gov.uk/gla/equalities-framework/eqia/index.jsp

Draft Further Alterations to the Mayor's London Plan (May 2006) EqIA Summary Report, September 2006
http://www.london.gov.uk/mayor/strategies/sds/further-alts/docs/equals-impact-summary.pdf

Capital Homes: London Housing Strategy 2005 – 2016, EqIA Report, Mayor of London http://www.london.gov.uk/gla/publications/housing/eqia-report.pdf

The Easy Way to EqIA – short, jargon free and practical tips for Equalities Impact Assessments, Central Services Agency, June 2005
http://www.centralservicesagency.com/files/equality_relaunch/file/Easy_EQIA.pdf

SPG Implementation Point 2d: Identifying the issues in Community Involvement
Boroughs are asked to ensure that existing corporate equalities action plans are reflected in planning guidance, development frameworks and planning briefs. Some of the issues will be of particular importance in different boroughs and additional local issues will need to be identified and related to the strategic issues. Boroughs should consider the use of equality impact assessment (either separately or as part of integrated impact assessments) on all statutory land use plans and development briefs and are encouraged to require them on major planning applications.

2.7 Equality and diversity in the planning profession

An important part of planning for equality and promoting diversity is ensuring that the people responsible for delivering services are representative of the communities they serve. This means that wherever possible, providers of public services should seek to use their recruitment and procurement techniques to encourage representation that reflects the composition of the local population.

In local authorities, the increased use of consultation and participation may provide an opportunity to develop posts, which could be filled by people representative of the local communities. This would serve to increase participation in planning events and increase officer understanding of local issues. Several of the London boroughs have implemented interesting programmes to engage with local communities and improve the representation of their staff, including recruiting staff through the Tomorrow's Planners project. Path UK runs this project with the Planning Inspectorate and Communities and Local Government (CLG) and aims to increase the representation of people from black and minority ethnic backgrounds in the planning profession over the next ten years through the use of positive action training programmes (under section 37 and 38 of the Race Relations Act 1976 – Amendment 2000) which provide access to opportunities for people from black and minority ethnic groups in professions where they are under represented. The scheme has successfully recruited 81 trainee planners from 2002 to 2007 and has made a valuable contribution to increasing the multi-cultural representation of planners.

For further information on the Tomorrow's Planners scheme and Path UK: http://www.pathuk.co.uk/services/index.cfm?ccs=169

SPG Implementation Point 2g: Encouraging diversity in planning departments in London
Boroughs are asked to follow best practice in recruitment and procurement procedures to ensure members of staff are representative of their local communities.

3 The key spatial and social issues for London

This part of the document deals with some of the key issues relating to spatial planning for equality and promoting diversity. It sets out:

· The relationship between spatial planning and wider social issues
· Overarching principles for planning for equality in London
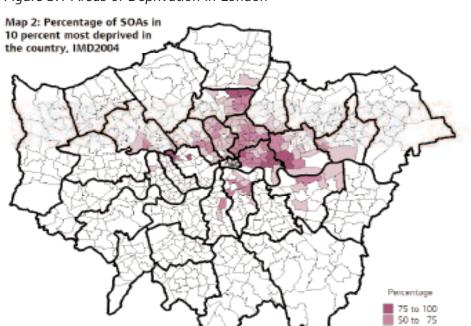· Addressing the equality elements to key spatial planning issues

3.1 Spatial planning and social issues

Planning is still largely viewed in its narrowest sense as simply a *land-use* issue. However, while its main focus is of course on land-use, spatial planning is increasingly being viewed in a wider context, where greater account is taken of the interactions with and impacts on wider public policy measures. How spatial planning can be used to reduce inequality and address social exclusion has become a key policy and practical concern.

Deprivation and regeneration

Communities are classified as being 'deprived' or 'disadvantaged' according to the key indicators established by the ODPM. These indicators include: income deprivation, employment deprivation, health deprivation and disability, education, skills and training deprivation, barriers to housing and services, living environment deprivation and crime.

Figure 3.1 shows the spatial distribution of deprivation in London according to these measures and reveals a concentration of deprivation in the inner boroughs, especially to the east and north east of the city.

Figure 3.1 Areas of Deprivation in London

Map 2: Percentage of SOAs in 10 percent most deprived in the country, IMD2004

Percentage
- 75 to 100
- 50 to 75
- 25 to 50
- 0 to 25

Source: Office of the Deputy Prime Minister, Indices of Deprivation 2004

NB: SOA = Super Output Areas

There is also an ethnic dimension to the distribution of 'deprived' communities, with most minority groups also experiencing high levels of child poverty and unemployment. Many of these issues are primarily related to income inequalities. While London is a city of great wealth, there is a growing gap between the richest and the poorest, which results in considerable levels of poverty and income polarisation in the city[8]. Research for Shelter showed that, in the decade up to 2003, housing wealth per child in the best-off ten per cent of areas increased 20 times more than in the worst-off ten per cent of areas[9]. This leads to cycles of poverty, reduced opportunities and entrenched area-based inequalities.

Areas inhabited by communities experiencing social exclusion and disadvantage are also more likely to be of poor environmental quality or in areas facing greater environmental threats, such as flooding or pollution[10]. This, combined with poor quality and inappropriate housing, lack of access to social and community facilities, inaccessible and inadequate public transport, crime, lack of open space or lack of employment and recreation opportunities generates key quality of life concerns for these communities.

It is for this reason, that the Mayor is concentrating regeneration efforts in London on those areas in most need. Figure 3.2 shows the areas for regeneration as set out in the London Plan, in line with those areas that are in the 20 per cent most deprived wards in London. Matching regeneration efforts to areas of deprivation is a key way that disadvantage and deprivation can be tackled through spatial planning, especially if combined with improvements in wider service delivery. By providing opportunities for improving employment opportunities and skills levels close to areas of skills deficit – which relates to concentrations of low-paid workers and worklessness, regeneration efforts can also contribute to reducing the resource gap between the materially rich and the materially poor.

Figure 3.2 Areas for Regeneration

Based on composite of five Domains from London Index

1 Poverty in, and exclusion from the labour force
2 Dependency
3 Education
4 Health
5 Housing

▇ Within 20% most deprived wards in London

Source: The London Index of Deprivation, GLA 2002 (unpublished)

However, regeneration of the built environment alone cannot deal with inequality and social exclusion and to maximise their effectiveness, these efforts will need to be combined with wider social policy measures, better integration of all strategies and programmes, partnership working and community involvement.

Target equalities groups and regeneration
Many of London's deprived communities consist of target equalities groups – especially black, Asian and minority ethnic communities; faith groups; disabled and Deaf people; older people; children and young people; lesbians and gay men; bisexual and trans people; immigrants, refugees and asylum seekers and women. There are also significant concentrations of deprived white communities in these areas.

Regeneration initiatives aim to improve the environmental quality of these areas, through improvements to homes, open spaces and the surrounding public realm. But, they also have wider aims to improve levels of employment and training, educational attainment, health outcomes also to restore civic pride in an area and increase community participation.

The National Strategy for Neighbourhood Renewal (see www.neighbourhood.gov.uk) emphasises the way that Community Empowerment Networks, partnership, local leadership, the voluntary and community sectors and outreach can be used to close the gap that often exists between the planning system and people from disadvantaged and socially excluded neighbourhoods. The Neighbourhood Renewal Unit runs a number of the government's cross-sector regeneration programmes, including:

- New Deal for Communities, partnerships tackling the five key themes:
  - poor job prospects
  - high levels of crime
  - educational under-achievement
  - poor health
  - problems with housing and the physical environment.
- Neighbourhood Management, working with local agencies to improve and link their services at a local neighbourhood level.
- Neighbourhood Wardens, providing a highly visible, uniformed, semi-official presence in residential and public areas, town centres and high-crime areas.
- A Skills and Knowledge programme, offering practical support to those at the frontline delivering neighbourhood renewal as well as a number of programmes focusing on the importance of business involvement in tackling disadvantage.

Community involvement in regeneration
For these planning responses to be evidence based and specifically driven by local need, there must be detailed interaction with the communities involved. The most socially excluded communities are often the most negatively affected by the spatial implications of disadvantage, which prevents them from engaging in the planning process. This lack of participation further exacerbates the quality of life of these communities by reducing their ability to bring about positive change.

Local authorities should therefore use community engagement to effectively tackle disadvantage and help create a more equitable society. If planning is to work to strengthen communities in deprived areas, and support residents who are most vulnerable, it is important that the

impacts of these wider social issues are understood and tackled as an integral part of the planning approach, not as a separate issue. Partnership working and the use of innovative community consultation and engagement techniques will be a key part of this process.

SPG Implementation Point 3a: Considering the social and spatial issues
Boroughs are recommended to assess systematically the needs of target equalities groups and develop local policies in light of the strategic guidance below on issues relating to the overarching principles and key spatial issues identified below.

Signpost
The Neighbourhood Renewal Unit
http://www.neighbourhood.gov.uk/page.asp?id=3

Renewal is the online guide to what works in neighbourhood renewal. Documents on the site include how to guides, case studies, project summaries and much more. Wherever possible, the documents are based on evaluated evidence. http://www.renewal.net/

Indices of Deprivation 2004, ODPM
http://www.communities.gov.uk/index.asp?id=1128444 - P29_4409

3.2 Overarching principles: Planning for equality & diversity

The interaction between social and spatial planning issues is complex. At its simplest, good planning can improve environments and opportunities for communities experiencing disadvantage. Planning which does not adequately engage with, or consider the needs of, local communities is unlikely to improve their life chances and may further entrench area-based disadvantage. The following are some of the overarching principles to consider when planning for equality in London, which are recurring themes throughout this document:

- Celebrating London's diversity
- Promoting equality of opportunity and social inclusion
- Promoting community cohesion
- Sustainable and healthy communities.

Celebrating London's Diversity
Although London has many areas of disadvantage and deprived communities, one of its greatest strengths is that it is one of the most diverse cities in the world. More languages and cultures are represented in London than in any other city in the world.

London thrives on the diversity of its inhabitants and the varying cultural traditions they bring. Over time, London's diverse communities have established themselves as part of the fabric of the city – making London their home. In some areas, these communities have clustered over time and created areas of ethnic and cultural concentration. These areas such as Southall, Brixton, Stamford Hill and Little Portugal in Stockwell, have a distinct minority ethnic character and develop specific cultural and ethnically specific services.

At a strategic level some of these areas not only provide the support network for the local communities, but also provide an important role in the retail and leisure industries, especially tourism, with China Town in Soho and Banglatown in Spitalfields as notable examples. These communities also provide important links to developing economies, which can be capitalised upon in terms of London's international markets.

In London, while there is an undeniable need to balance improving environments for those living in poverty and social exclusion, it will also be important to maintain and enhance the diversity and uniqueness of the local ethnic or cultural character.

SPG Implementation Point 3b: Promoting ethnic diversity and multiculturalism
Boroughs are asked to consider measures that respect and enhance areas which benefit from a distinct minority ethnic character.

Promoting equality of opportunity
The promotion of equality of opportunity is a theme underlining the majority of policies in the London Plan – it relates to the access to facilities and services, enhancing employment opportunities, the protection of open spaces as well as a broad range of policies concerned with the quality of life. The Mayor recognises that there are groups of Londoners for whom equality of opportunity is of particular concern.

These are groups who suffer poverty, discrimination, or have particular needs, as a result of their age, disability, gender, race, religion or sexual orientation. Addressing the strategic land use, transport and development aspects of these needs is key to ensuring that the planning system is used to its full potential to deliver benefits to all communities.

> **SPG Implementation Point 3c: Promoting equality of opportunity**
> Boroughs are asked to consider how spatial planning can be used to promote equality of opportunity, especially in areas where there are concentrations of deprivation.

Promoting community cohesion

Promoting community cohesion is a key concept for planning in a city as diverse as London. It refers to a wider set of concerns that may include service provision, economic development, issues relating to social inclusion, education and planning. The development of community cohesion according to the Neighbourhood Renewal Unit is the attempt to build communities with four key characteristics:[11]

· a common vision and a sense of belonging for all communities;
· the valuing of diversity;
· similar life opportunities for all and;
· strong and positive relationships being developed between people from different backgrounds and circumstances in the workplace, in the school and within neighbourhoods.

An important area of community cohesion work is helping people, groups or communities to find consensual strategies or common grounds on which they can work together. This is especially important in resolving conflict and ensuring that all members of the community understand and respect each other. Community cohesion has an important role to play in tackling problems such as discrimination and hate crime and it creates benefits by increasing social interaction within communities, building up civic pride and tolerance of all other community groups. Intergenerational activity between young and old can also play a key role in achieving more cohesive communities and reducing fear of crime.

> **SPG Implementation Point 3d: Promoting community cohesion**
> Boroughs are asked to give special consideration to those planning measures that improve community cohesion.

Sustainable and healthy communities

Sustainability is a key consideration for promoting equality and diversity in planning. The ODPM's 'Sustainable Communities Paper' in 2003 was followed up by Planning Policy Statement 1, which refers to wider concepts of sustainability in planning and the concept of 'virtuous circles' tying together the 'various strands of economic development, social inclusion and environmental protection'[12].

In practical terms, providing a good mix of homes, accessible public transport and a vibrant local economy with both jobs and necessary services are the key factors creating sustainable communities – and reflect some of the fundamental ways that sustainable spatial planning can contribute to the equalities agenda. In addition, environmental considerations to improve the sustainability of buildings in reducing energy consumption and carbon footprints in their construction and everyday use are also ways that sustainability can factor in planning for equality.

By reducing carbon footprints of new and existing buildings, the negative impacts of climate change, which are likely to have an increased effect on disadvantaged communities, due to their location and reduced capacity to respond to emergencies, can be minimised. In addition, new industries developing to respond to the education around and implementation of energy efficiency and waste reduction measures will create a new skills and employment demand. These opportunities might be targeted at communities currently experiencing worklessness and skills deficits, contributing to wider social sustainability objectives.

Within deprived communities, health outcomes are significantly reduced. Planning for health is an important tool in meeting equalities and sustainability objectives. Many of the determinants of health are closely related to equalities considerations, such as ensuring equal access to employment, education, transport, good quality housing, healthcare and other services, leisure and recreation and open and green/natural space and measures such as promoting walking and cycling, are key to wider health and sustainability objectives. As deprived areas frequently suffer the poorest environments, environmental considerations as much as lifestyle elements need to be addressed. Provision of high quality open space around new developments and investment in the existing network of sites, especially to address local natural open space deficiency experienced by many inner city neighbourhoods can be an effective way to address environmental inequalities and improve the health and wellbeing of local communities.

SPG Implementation Point 3e: Sustainable and healthy communities
Boroughs are asked to consider how their development plan documents and community strategies can incorporate key sustainability concerns and reduce health inequalities.

Signpost
Health Issues in Planning, Best Practice Guidance, Mayor of London, June 2007 http://www.london.gov.uk/mayor/strategies/sds/docs/bpg-health.pdf

The East London Green Grid Framework, draft Supplementary Planning Guidance, Mayor of London, November 2006 http://www.london. gov.uk/mayor/strategies/sds/spg-east-lon-green-grid.jsp

Sustainable design and construction, Supplementary Planning Guidance, Mayor of London, May 2006 http://www.london.gov.uk/mayor/ strategies/sds/docs/spg-sustainable-design.pdf

3.3 The key spatial planning issues

There are a number of key spatial planning issues that can contribute to meeting the needs of communities (and individuals) experiencing disadvantage and social exclusion. These issues are set out below in their London Plan context, with their relationship to some of the wider social issues and outcomes explored:

· Urban design and public realm
· Accessible, inclusive and safe environments
· Access to appropriate and affordable housing
· Access to employment and training opportunities
· Access to open space and recreational areas
· Provision of social infrastructure and community facilities
· Access to public transport, walking and cycling facilities
· Provision of leisure and recreational facilities.

While there a number of common concerns in planning for equality, there are some issues which are also relevant to specific communities or equality target groups – these are further explored in Part 4 of this SPG.

3.4 Urban design and public realm

(Links to crime, personal safety, mobility, accessibility)

The design of a development or area of public realm fundamentally affects the way people move within and around that space. It also has an impact on how they feel about and interpret a place. Good urban design can create welcoming areas where communities can interact. It can be used to create attractive environments which are socially available for certain groups such as children and young people and older persons and creating well-used areas brings about a monitoring by the local community, increasing safety. In this way, attractive and welcoming spaces engender a greater sense of community ownership, and contribute to community cohesion.

Urban design can be used to ensure that the environment is accessible for all. For example, ensuring that there is appropriately placed street furniture, good lighting and even surfaces makes it easier for people with mobility impairments to negotiate the public realm and take an active part in community life.

Using urban design to prevent crime and improve the safety of the public realm is another way that spatial planning can be used to reduce inequalities for more vulnerable people. The public realm can be a hostile place for many Londoners. Older people and disabled people often feel discouraged from travelling around the city and cite lack of accessible public toilet provision, especially at public transport facilities and public spaces as a barrier to independence. Similarly many women, irrespective of age, may avoid travelling alone, especially at night. This reduction of independence can lessen opportunities to work and enjoy the built environment and limits the chance to broaden individual travel horizons. Children and young people also have concerns about their personal safety and security in London's public spaces.

The London Plan Policy 4B.1 emphasises the need for design-led planning solutions to tackle issues of safety and the creation of accessible environments for all.

London Plan Policy 4B.1 Design principles for a compact city
The Mayor will, and boroughs should, seek to ensure that developments:
- maximise the potential of sites
- create or enhance the public realm
- provide or enhance a mix of uses
- are accessible, usable and permeable for all users
- are sustainable, durable and adaptable
- are safe for occupants and passers-by
- respect local context, character and communities
- are practical and legible
- are attractive to look at and, where appropriate, inspire, excite and delight
- respect the natural environment
- respect London's built heritage.

These principles should be used in assessing planning applications and in drawing up area planning frameworks and UDP policies. Urban design statements showing how they have been incorporated should be submitted with proposals to illustrate their design impacts.

It is important to recognise the positive benefits that good urban design, following the principles in London Plan Policy 4B.1, can have on local communities. For this reason, it is imperative that these principles are applied not only in new developments, but are also used to improve areas of disadvantage and poor urban quality. This might be through programmed estate renewal programmes or through actions identified in community strategies – such as the need for a new town square - as part of the Local Development Framework process.

SPG Implementation Point 3f: Improving urban design and public realm in all areas
In addition to applying design principles for a compact city (London Plan Policy 4B.1) to new developments, boroughs are asked to identify those existing areas in need of improvement and to take measures to address deficiencies.

Signposts
Sustainable Design and Construction, Supplementary Planning Guidance to the London Plan, 2006
http://www.london.gov.uk/mayor/strategies/sds/sustainable_design.jsp

Secured by Design, Association of Chief Police Officers Project and Design Group, 1994 http://www.securedbydesign.com/

Safer Places: The Planning System and Crime, ODPM, 2004
http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_028449.pdf

www.livingstreets.org.uk

Design for London
www.designforlondon.gov.uk

3.5   An accessible, inclusive and safe environment
(Links to accessibility, personal safety, discrimination, social exclusion)

An accessible and inclusive environment not only enables disabled people to access and use mainstream facilities without segregation or special treatment, but also enables older people, children and young people or any person with a mobility issue (for example a parent with a pushchair), to use these facilities equally, with choice and dignity. The definition of inclusive design in the London Plan is:

'… design that creates an environment where everyone can access and benefit from the full range of opportunities available to members of

society. It aims to remove barriers that create undue effort, separation or special treatment, and enables everyone regardless of disability, age, or gender to participate equally, confidently and independently in mainstream activities with choice and dignity.'

Inclusive design is therefore a key prerequisite to social inclusion and equality. It encourages all communities to take part in everyday life and claim ownership of the urban realm. Ensuring that inclusive design informs and directs development at the earliest stage in the design process is essential to its successful implementation. Policy 4B.5 of the London Plan sets out accessibility standards for development in London.

London Plan Policy 4B.5 Creating an inclusive environment
The Mayor will require all future development to meet the highest standards of accessibility and inclusion. UDP policies should integrate and adopt the following principles of inclusive design that will require that developments:

· can be used easily by as many people as possible without undue effort, separation, or special treatment

· offer the freedom to choose and the ability to participate equally in the development's mainstream activities

· value diversity and difference.

Inclusive Design
The Mayor published in April 2004 Supplementary Planning Guidance on Accessible London: achieving an inclusive environment[13]. It sets out 28 Implementation Points to assist boroughs in implementing the policies in the London Plan that promote inclusive design and the social model of disability (refer to Section 4.4 for more information). It sets out some minimal criteria for an inclusive environment, which:

· provides equitable access

· allocates appropriate space for people

· ensures ease of use, comprehension and understanding

· requires minimal stress, physical strength and effort

· achieves safe, comfortable and healthy environments.

The Accessible London SPG includes signposts to a number of other useful documents on legislation, government policy, technical standards and good practice advice and should be read alongside this SPG.

In August 2004 CABE published The Principles of Inclusive Design[14]. If these principles are applied, developments:

- can be used safely, easily and with dignity by all regardless of disability, age, gender, ethnicity or financial circumstances
- are convenient and welcoming with no disabling barriers, so everyone can use them independently without undue effort, separation or special treatment
- are flexible and responsive taking account of what different people say they need and want, so people can use them in different ways
- are realistic, offering more than one solution to help balance everyone's needs, recognising that one solution may not work for all.

The principles of inclusive design should be used in assessing planning applications and in drawing up master plans and area planning frameworks. Design and Access Statements should be submitted with development proposals explaining how the principles of inclusive design, including the specific needs of disabled people, have been integrated into the proposed development and how inclusion will be maintained and managed.

SPG Implementation Point 3g: Principles of inclusive design
Developments should be accessible and inclusive taking account of the Mayor's Accessible London SPG and CABE's Principles of Inclusive Design.

Design and Access statements
Since the government introduced changes to the planning applications process in May 2006, access statements have become an important tool to ensure that new developments have adequately considered accessibility issues as part of the design process.

Access statements accompany a planning application, but are not part of it and are needed with most types of application. They are needed to explain and justify what is being applied for, and can be linked to planning decisions by conditions so that developers are required to implement commitments made in the statement.

The circular *Guidance on changes to the development control system*[15], effective from 10 August 2006, sets out the formal requirements and asserts that statements should explain the design principles and concepts that have informed the development and how access issues have been dealt with. Applicants should set out in design and access statements how the objective of creating an inclusive development will be met and the process to achieve this[16].

Open space and recreation facilities
Ensuring accessible and inclusive environments should also be extended to the provision of open spaces and recreation facilities, which have important health and well-being benefits.

Many groups are not able to enjoy open space as freely as they would like – especially disabled and older people – as their needs are not adequately considered in the ongoing management of facilities. Some communities, such as new migrants, may not view these spaces as being available for their use and be fearful of using them. Wherever possible adjustments should be made to ensure that paths and walkways are clearly separated from roads and cycle paths and are easy to negotiate for those in wheelchairs or with other mobility issues so that these spaces can be effectively used for all.

Discrimination and hate crime
Hate crime tends to be specifically directed at race groups, faith groups, disabled people, lesbians, gay men, bisexuals and trans people and can range from verbal abuse to direct hostility and physical attacks. The reality of these types of events, apart from having specific and long-lasting repercussions on the victims, is that they can also create a sense of fear that may prevent people from accessing public transport, enjoying the public realm and retreating from urban life, which undermines other strategies for creating social inclusion.

While hate crime is part of a much wider social issue, which must be tackled through educational and legislative measures, spatial planning can make a positive and complementary contribution by ensuring the creation of safe urban environments, including good urban design, 'natural' monitoring through well-used spaces, lighting and where necessary the use of CCTV. These measures also ensure that the urban realm is non-discriminatory and accessible for all.

SPG Implementation Point 3h:
Creating safe and inclusive urban environments
Ensuring that wherever possible urban environments are overlooked and well-used, with direct routes, safe street scaping and good lighting will help all people, but especially the more vulnerable, to feel more confident in the urban environment and will work well alongside other public policy measures to reduce discrimination.

SPG Implementation Point 3i: Combating harassment
Boroughs are encouraged to monitor harassment cases and establish systematic processes so that planning can respond, where appropriate, alongside increasing investment and support for community and police based organisations supporting victims of harassment.

Signposts
Supplementary Planning Guidance Accessible London: Achieving an Inclusive Environment 2004 http://www.london.gov.uk/mayor/strategies/sds/accessible_london.jsp

Principles of Inclusive Design CABE, 2006
http://www.cabe.org.uk/AssetLibrary/8853.pdf

Design and access statements: How to write, read and use them, CABE, 2006 http://www.cabe.org.uk/AssetLibrary/8073.pdf

The Disability Rights Commission (DRC) http://www.drc-gb.org/ and Disabled Persons Transport Advisory Committee (DPTAC) http://www.dptac.gov.uk/ web pages contain useful statistics and publications relevant to those responsible for designing and managing the built environment.

Living Streets website also has information regarding the design, management and maintenance of accessible streets http://www.livingstreets.org.uk/download/16-pb002-accessible-streets.pdf

3.6 Access to appropriate and affordable housing
(Links to accessibility, mobility, personal safety, social exclusion & poverty)

Access to appropriate housing is particularly important for reducing inequalities, because too often those who are most disadvantaged are more likely to be living in housing that does not adequately meet their needs. Lack of choice and quality in housing stock means that the most vulnerable communities are often housed in cramped, poor quality accommodation within deprived areas. These areas include high concentrations of people from ethnic minority communities as well as women, older people living alone and families with young children. Poorer families are also more likely to be living in overcrowded housing, with significant health and quality of life implications.

Poor design of housing stock may encourage crime and where neighbourhoods appear run-down and neglected it reinforces negative attitudes, undermines local confidence and reinforces unpopularity and low demand[17].

Ensuring that a mix of housing design, type and tenure is available to local residents is important to address inequalities in housing. Size and style of

homes provided is also a key factor as different cultural and ethnic groups require different kinds of housing, with some groups requiring larger houses and some requiring specialist local facilities or housing.

Housing and health

Housing is also an important determinant of health. Therefore ensuring appropriate housing can help to reduce health inequalities. The location of new housing in relation to environmental health hazards such as industrial areas/floodplains is thus an important consideration and especially in areas containing communities, for example older people, who are less able to deal with the impacts of environmental hazards such as flooding.

The quality of homes is also an important consideration – with many of London's most vulnerable inhabitants living in the poorest quality homes. Fuel and cool poverty – where people are unable to effectively heat their homes in winter or cool them in summer, due to poor insulation and a lack of funds is a major issue in London. Climate change and the increasing effects of the urban heat island will make this a more important consideration.

While measures are being taken to improve the situation in local authority stock in line with Decent Homes Standards, there are many poor quality homes in the private sector. Boroughs should be aware of the potential issues of fuel and cool poverty on their more vulnerable local communities, and should attempt to address these through landlord partnerships. New homes should be built to be energy efficient, reducing the need for heating and cooling by using sustainable design and construction methods. As part of renovations and refurbishments, retrofitting of energy efficiency measures is encouraged to reduce carbon footprints in both new and existing housing stock. As industries are established to meet these needs, there will be additional employment and skills benefits, especially if the spatial planning system creates the right conditions.

In addition to the quality, availability, type and tenure of housing it is important that wider ancillary needs are considered alongside housing need. These might include the provision of outdoor spaces for play and social activities, community facilities (please refer to Section 3.7) such as shops, post office, library, GP surgery, schools, or childcare facilities. Wherever possible, these facilities should be located near to housing and well connected, designed and signposted walk and cycle ways should be provided. The use of public transport links should also be maximised, where on-site provision of facilities is not feasible.

Affordable and accessible housing choice

New developments should seek to provide adequate levels of social and affordable housing to match local need. Appropriate housing provision can help reduce the level of underused properties in and around London and address shortages in affordable homes. The increased provision of affordable and family sized (3 bed+) housing (Policy 3A.7) is a key factor in reducing inequality in housing provision and overcrowding, but planning departments should avoid the location of social housing on the least attractive and least well-connected parts of development sites. Supplementary Planning Guidance on Housing (2005) provides detailed guidance for boroughs on how to develop sites for housing and how to determine housing mix and density for any individual site.

'Lifetime Homes' aim to allow residents to remain in their homes for longer by making housing more flexible especially for older people and disabled people in transitional stages within their lives. Building all new homes to Lifetime Home standards will address shortages in homes that are suitable for disabled people and older people and will reduce costs in adaptations currently required to meet these specific needs. Building a proportion of homes that are fully wheelchair accessible will help cater for unmet need for people who need the additional space and flexibility.

The Mayor has investigated the feasibility of establishing a London register of accessible housing in both the public and private sector. The results of this are now being incorporated into the proposed Pan-London Choice and Mobility scheme. In undertaking an assessment of housing needs, a borough should consult fully and ensure that the assessment includes the full range of different communities within the borough and that these communities are consulted on how policy is derived from the needs assessment.

London Plan Policy 3A.4 Housing choice

Boroughs should take steps to identify the full range of housing needs within their area. DPD policies should seek to ensure that:

· new developments offer a range of housing choices, in terms of the mix of housing sizes and types, taking account of the housing requirements of different groups, such as students, older people, families with children and people willing to share accommodation

· all new housing is built to 'Lifetime Homes' standards

· ten per cent of new housing is designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users.

SPG Implementation Point 3j: Lifetime Home Standards
All new housing should be built to allow the design of individual homes to be more flexible, enabling residents for example older and disabled people, to remain in their property for longer.

Family housing
The size of rooms provided in new accommodation should be in line with the guidance on bedroom size mix in the Mayor's Housing SPG. The Mayor's Housing Density Review and Residential Space Standards projects aim to achieve a better mix and better standards of housing for families with a significant potential positive impact for children and young people and ethnic minority people. In applying the density policy set out in the London Plan, boroughs should have regard to the need to provide an appropriate mix of housing, including family housing. Density should be assessed in terms of habitable rooms as well as homes.

Housing policy is also an important factor in creating community cohesion. By providing the right level of accommodation, families are able to establish themselves within a community. This helps to preserve the 'uniqueness' created when communities with particular housing needs settle in distinct areas.

SPG Implementation Point 3k: Family housing
Housing needs of larger families in London need to be addressed by borough planning documents. Planning and design needs to be integrated with providing the community infrastructure to support families, including child care and health facilities. Larger housing units for large families and suitable play spaces should be planned within high-density design.

Special needs and specialist housing
Many Londoners require special needs and specialist housing – especially older and frail people and people with severe physical impairments. There is a large stock of sheltered housing in London for older people but it is of variable quality and does not adequately match current need. The Mayor supports the redevelopment of unpopular, outmoded or hard-to let sheltered accommodation to provide housing that more closely meets current needs although it is important to ensure that adequate supply is maintained in the provision of residential and extra care housing.

Development in the future is likely to focus on much needed extra care housing, which provides a range of facilities and 24-hour care and support on site when needed. Redevelopment of existing schemes may therefore involve transforming current housing into extra care sheltered housing or into provision for other client groups.

London Plan Policy 3A.10 Special needs and specialist housing
DPD policies should provide for special needs housing, including sheltered housing with care support, staffed hostels and residential care homes, based on up-to-date estimates of need.

Signposts
Housing, Supplementary Planning Guidance to the London Plan, 2005
http://www.london.gov.uk/mayor/strategies/sds/spg_housing.jsp

London and Sub-Regional Strategy Support Studies, August 2005
http://www.london.gov.uk/mayor/housing/support-studies.jsp

Density Review http://www.london.gov.uk/mayor/planning/docs/density-matrixreview.pdf

Residential Space Standards report http://www.london.gov.uk/mayor/planning/docs/space-standards.pdf

Accessible Living in London: A Feasibility Study for an Accessible Housing Register for London - November 2004 http://www.london.gov.uk/mayor/housing/docs/accessible_living.pdf

Accessible London: achieving an inclusive environment. Lifetime Homes Case Study Examples, Mayor of London, 2006.
http://www.london.gov.uk/mayor/strategies/sds/docs/lifetime-homes.pdf

Greater London Housing Requirements Study December 2004
http://www.london.gov.uk/mayor/housing/docs/housing_reqs_2004.pdf

3.7 Access to employment and training opportunities
(Links to social exclusion, discrimination, poverty)

While London continues to experience growth in terms of economy and employment, there are still vast inequalities in access to jobs and levels of worklessness in the capital. London has a higher proportion of its working age population who are not in paid work than any other region of the country[18]. This includes young people who are not in employment or training (NEET), which has significant implications for ongoing cycles of worklessness and poverty in some of London's most disadvantaged communities.

Too often, these communities are unable to access appropriate employment or training opportunities. This inequality in access to jobs further contributes to poverty and social exclusion, with debilitating

effects on morale, health, family status and even social networks of individuals and communities[19]. For London to achieve the same proportion of the working age population in employment as in England and Wales would mean 250,000 more Londoners in work. This means there are also wider economic benefits to improving access to employment and training by widening the pool of labour for employers and extending the tax base.

London Plan Policy 3B.1 recognises the need for providing premises within development to meet the needs of London's economic growth, but more particularly to ensure that Londoners benefit from new employment opportunities in the capital.

London Plan Policy 3B.1 Developing London's economy
The Mayor will work with strategic partners to support and to develop London's economy as one of the three world cities. He will:

- seek a range of premises of different types, sizes and costs to meet the needs of different sectors of the economy and firms of different types and sizes and to remove supply side blockages for key sectors, including the finance and business services sector

- match the spatial application of policies to the needs of different sectors and markets within the London economy including small and medium enterprises and black and minority ethnic businesses

- establish a 'research observatory' and 'sector commissions' to monitor the implementation of this plan to ensure that it is updated as appropriate to respond to the different sectors of the London economy, and to their linkages and needs

- promote London as a location for international and European agencies

- ensure cohesion with regional policy to secure sustainable relations between London and its wider region in terms of urban forms, flows and processes

- facilitate social enterprise and community development.

London Plan Policy 3B.12 recognises the importance of co-ordinating and providing the spatial context alongside the range of initiatives necessary to improve the employment opportunities for London, including the removal of barriers to work. It emphasises the need to ensure that opportunities provided by major new development are used to assist in skills action and the targeting of job opportunities to local communities.

The government has also recently announced its intention to devolve responsibility for setting the strategy for adult skills in the capital. This will drive the work of the Learning and Skills Council (LSC) to improve adult

skills in London. The Mayor's new London Skills and Employment Board will define future skills investment priorities and will be able to secure greater engagement with business.

The two London City Strategy Pilots – covering much of east and west London – are new initiatives established to find innovative ways to increase the employment rate and reduce child poverty. The pilots bring together boroughs, the LSC, Jobcentre Plus, local businesses, the LDA and the GLA, and are focused on structural changes to existing services. These include integrating services such as training, childcare, financial advice and job search at the point of use and widening access to them, especially for families with children in poverty. These changes will take effect from 2007.

Skills and training

London has the highest unemployment rate in the country at 7.5 per cent and an employment rate 5 per cent below the national average. A number of factors lie behind this high unemployment and low employment rate. Skill levels are only one dimension, but a key one. Employment rates in London vary dramatically by skill level. In 2004, for example, 87 per cent of Londoners with NVQ level 4 and above qualifications were in work, compared to 69 per cent for people with qualifications below NVQ level 2 and only 43 per cent for people without any qualifications.

A high percentage of London residents are qualified to degree level (31 per cent) compared to the national average (26 per cent). However, 25 per cent of the population are not qualified to basic employability level (which we call Level 2, the equivalent of at least five good GCSEs) and 14 per cent have no qualifications whatsoever. In a number of boroughs more than 50 per cent of the resident population have low or no formally recognised qualifications. (Low level usually means that people may possess a small number of GCSEs with passes at D to G or parts of other qualifications only).

Local employment

Boroughs are encouraged to get agreement of developers to use reasonable endeavours to encourage the recruitment of local businesses and people living within the locality of an application site to apply for jobs or work (including self employed and sub contracting) arising out of the construction of the development or in the resultant end use, or to become a supplier of goods and services. The borough will need to consider what 'local' should mean on a case-by-case basis in light of the size and nature of the proposal e.g. reasonable walking distance from site, within borough or sub-region.
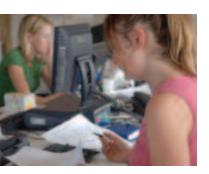
In new developments within or near to areas with high levels of worklessness, the submission of an employment and training strategy is encouraged. Such a strategy should give consideration to the following:

- The creation of local employment during construction and within completed development;
- The utilisation of SME's and local businesses, in particular those owned ethnic minority, women or disabled persons or groups, both during the construction period and within the completed development;
- Addressing barriers to work:
  - through improvements to transport and access arrangements
  - through the provision of child care facilities
  - through the training of local people
- Business support;
- The provision of alternative premises for those displaced by the proposal; and
- Sustainable procurement principles.

The employment and training needs arising from the development may be either generated by the development itself or identified in the surrounding area. In making an assessment of such needs, it may be necessary to take into account the cumulative effect of the surrounding developments on the existing social and physical infrastructure of the surrounding area. With regard to considering employment and training needs within new developments, this could include the potential for:

- Local employment during construction and within the completed development (including opportunities for 'local' SME's, BAME's, businesses and residents to apply for employment during construction and within the completed development).
- Employment and training initiatives during construction and within the completed development (including financial contributions towards initiatives safeguards of the use of any contributions, monitoring the use of any financial contributions, direct provision of employment and training initiatives and / or premises by the developer, funding of any ongoing management costs of premises, the dual use of existing or proposed premises for undertaking these initiatives).
- Monitoring of local employment during construction and within the completed development, monitoring targets, and the provision of monitoring information.
- Implementation measures (including links made with existing initiatives, formation of employment/training forum/partnership/consultative groups, and other appropriate schemes).

With regard to child care and other caring responsibilities as part of this assessment, this could include: provision of a financial contribution, safeguards of the use of any contributions, safeguard of subsidy over a period of time, defined level of childcare provision, defined qualifying employees, secure care provision for older children before and after school or during school holidays and support for employees with other care responsibilities (e.g. disabled, long term sick or elderly dependents for example, through subsidy to pay for care costs or the agreement of flexible working arrangements).

SPG Implementation Point 3l: Creating local employment in new developments
Boroughs are encouraged to investigate with developers the possibility of providing local businesses and residents the opportunity to apply for employment during the construction of developments and in the resultant end use.

Training and employment strategies
A training and employment strategy should be encouraged where appropriate and should give consideration to including:
- timing and arrangements for its implementation including funding arrangements;
- a stakeholder charter to ensure initial and subsequent employers within the completed development participate in the implementation of the strategy;
- minimum local recruitment targets for employees and targets for the involvement of local businesses and measures to be undertaken by the Developer to meet with these targets;
- periodical workforce and business monitoring and reporting of the results to the council, the London Development Agency and such other parties as may be set out in the approved strategy;
- a programme for skills training for local residents and/or businesses- including the provision of suitably equipped training premises;
- local publicity, awareness raising proposals and methods for advertising employment opportunities and impending contracts;
- initiatives to promote the involvement of local businesses including sub-contracting and the supply of goods and services;
- initiatives to promote the employment of small and medium businesses;
- initiatives to promote the employment of BAME businesses; and
- projects for removing barriers to employment including the availability of childcare.

SPG Implementation Point 3m: Skills and training

To ensure that opportunities to provide training and skills improvements are achieved, developers are encouraged to either directly provide employment and training initiatives or make a financial contribution to support such initiatives to be run/managed by the Council (see SPG Implementation Point 3o). The timing and content of such training programmes should be closely aligned with the skills requirements arising from the development. These initiatives should cover both the construction period and the completed development. The submission of an employment and training strategy to support this is encouraged.

Removing barriers

The London Skills Survey (2002) highlighted the variations in economic status by demographic factors and by qualifications held. It found that London residents are on average more likely to be unemployed if they hold low levels of qualification, if they have a disability or if they come from a Black, Asian and Minority Ethnic (BAME) community. However exploration of the main reason for unemployment shows that the majority of unemployed residents believe it is a lack of total or suitable jobs available that are holding them back rather than any other factor[20].

The LDA supports the improvement to employment and skills opportunities in terms of the number and range of opportunities available to local residents (within the area, borough and the sub region as appropriate) as well as the employment opportunities for local businesses in, for example in the provision of goods and services.

The creation of new opportunities in the borough should be through enabling local residents and businesses to gain access to them by tackling some of the major barriers to employment. This will contribute to reducing disparities in labour market outcomes between groups. The promotion of local businesses is also important and policies and initiatives should also be supportive of these needs, especially small and medium businesses (SME's) which offer better opportunities for some of the equality groups such as women, disabled people and BAME people.

There is an important role for planning in ensuring that an adequate mix of businesses and public services (and therefore employment opportunities) are provided close to those communities who are in need of local jobs. In the same way, planning can help to remove many barriers to employment and training opportunities by:

· providing for affordable childcare facilities;

· providing for business start up units and advice for local entrepreneurs;

- providing for training facilities in new developments creating high levels of jobs, to help the skills of local people match the needs of new employment;

- ensuring facilities for employment are well-designed and accessible; and

- locating employment and training facilities within walking/cycling or public transport access of local communities.

There is also a role for planning processes to consider the accommodation needs of community and voluntary sector organisations, which can provide important local jobs, experience and services. In addition, positive action is required by employers and agencies to promote equality of opportunity through good recruitment practices and ensuring that local people are connected to local jobs. The planning system can support the delivery of these elements by way of negotiation, or through the use of appropriate conditions and Section 106 agreements. Section 106 agreements may also be a way of providing funding for local skills training and employment opportunities, but any use of funds in this way should take into account the demographic profile of the surrounding area of the proposal/ application/development in question and should be evidence based and specifically driven by local need as opposed to preference.

SPG Implementation Point 3n: Using Section 106
Boroughs are asked to consider local skills and employment needs (reasonably related to the development in scale and kind) and how these might be addressed when negotiating S106 agreements on new developments.

SPG Implementation Point 3o: Supporting local employment centres
Boroughs are asked to support local hubs of employment. Proposals that combine social services provision, health and social care provision and childcare can provide employment opportunities for many people who are disadvantaged in the labour market. Developments should seek to provide a range of services fully accessible by public transport, reducing car dependency in line with London Plan policies 2A.5 Town Centres, 3B.1 Developing London's Economy and 3D.1 Supporting Town Centres.

However, unemployment is only part of the story; there are a lot of people not in work who are not counted as unemployed e.g. disabled people on incapacity benefits, lone parents unable to find childcare, migrants whose qualifications are not recognised in the UK. The London FRESA project targets lone parents, young people, men over 50, BAME people, disabled people, offenders and ex-offenders, refugees and asylum seekers, and homeless people to achieve skills training and employment[27].

> **SPG Implementation Point 3p: Employment and training access for all**
>
> To help disabled people gain access to employment and training facilities, it is important that new employment and training facilities are located and designed to be fully accessible for all. In addition, people from all communities including lone parents, young people, men over 50, BAME people, disabled people, offenders and ex-offenders, refugees and asylum seekers, and homeless people should be able to access facilities provided, especially to help secure employment.

There is also a role for employers and the business community to consider the positive impacts they could bring by implementing sustainable procurement and supplier diversity procedures to open up opportunities for local entrepreneurs. Supporting women, black, Asian, minority ethnic or disabled led SME's for example, is one way that larger businesses can contribute to promoting equality.

Signposts

'What works with tackling worklessness?' is a comprehensive and timely review of evidence to help tackle this problem. The report looks at the effectiveness of policies to help workless people get and keep paid employment.

http://www.lda.gov.uk/upload/pdf/what_works_with_tackling_worklessness.pdf

The London Skills Commission London's Framework for Regional Employment and Skills Action October 2002 www.fresa-london.org

DMAG Briefing 2003/12 March 2003 Women and the labour market an analysis of Labour Force Survey data for London 2001/02 http://www.london.gov.uk/gla/publications/women/dmag_briefing.pdf

DMAG Briefing 2003/1 January 2003 *Disabled people and the Labour* market http://www.london.gov.uk/gla/publications/equalities/disability_briefing.pdf

3.8 Access to social infrastructure and provision of community facilities

(Links to accessibility, social inclusion, poverty, mobility)

Londoners need access to the social infrastructure and community facilities necessary for them to carry out their day-to-day lives and make the most of

what the city has to offer. Access to these facilities allows for the development of social networks which are important in ensuring sustainable development, social cohesion and ultimately, sustainable communities. But, poverty and discrimination can prevent people from fully accessing and receiving the benefits associated with the provision of the facilities.

These facilities include: primary healthcare facilities; children's play and recreation facilities; services for young people; older people and disabled people; as well as libraries; sports and leisure facilities, open space; schools; nurseries and other childcare provision; facilities for training and advice centres; adult learning; fire and police station; community halls; meeting rooms; places of worship and public toilets. Retail provision is also an important community facility, especially for the provision of fresh food in inner city areas and essential services such as chemists, banks and post offices.

Access to affordable, fresh food for all and the elimination of 'food deserts' is one of the objectives of the Mayor's Food Strategy for London. Local markets have an important role to play in providing cheap and accessible food supplies, and should be enhanced wherever possible. They also have the added benefit as functioning as important social spaces for local communities[22].

The provision of affordable accommodation for voluntary and community sector organisations is also key to ensuring that local level services, such as training and advice centres tailored to specific community needs can be adequately met. These organisations can provide useful links for planning authorities when engaging with local communities in the production of community strategies.

Wherever possible, in areas where there are concentrations of ethnic or religious groups, these communities should be encouraged to contribute towards the provision of culturally specific facilities and delivery of local services. This will ensure that services provided and facilities offered (including recreation) are relevant to local community needs. It will also generate local employment opportunities and play a role in offering a range of initiatives to tackle low participation in the labour markets by some groups.

The location and design of social infrastructure and community facilities must also be suitable for the specific needs identified for equality groups. These include the need for wheelchair and pushchair accessibility and location near to public transport or local walking and cycling routes. Affordability of social infrastructure and community facilities is also a key

consideration with admission or membership costs often being prohibitive to local families. Minimum subscription periods can also deter people living on a tight budget, or those expecting to move for work or study reasons, from trying out a nearby facility. These issues may be addressed through planning conditions or planning obligations in the provision of new facilities.

London Plan Policy 3A.15 Protection and enhancement of social infrastructure and community facilities
DPD policies should assess the need for social infrastructure and community facilities in their area, including children's play and recreational facilities, services for young people, older people and disabled people, as well as libraries, community halls, meeting rooms, places of worship and public toilets. Adequate provision of these facilities is particularly important in major areas of new development and regeneration.

Policies should seek to ensure that appropriate facilities are provided within easy reach by walking and public transport routes of the population that use them. The net loss of such facilities should be resisted.

London Plan Policy 3A.16 The voluntary and community sector
The Mayor will and boroughs should assist the voluntary and community sector in delivering the objectives of this plan. In particular, boroughs should, when reviewing DPDs, consult voluntary and community organisations and include policies that address their need for accessible and affordable accommodation.

SPG Implementation Point 3q: Supporting the provision of social infrastructure and community facilities
Boroughs are advised to support the provision of social infrastructure and community facilities as listed in London Plan Policy 3A.15 – especially those facilities which provide a specific cultural element or local sports facilities. Where there are gaps (identified through assessment of need – please refer to SPG IP 3q) measures should be taken to fill these.

SPG Implementation Point 3r: Equitable access to services
Boroughs are advised to use local evidence to ensure that development plan documents and planning proposals provide access to health and social facilities for all communities, and especially those from vulnerable groups.

SPG Implementation Point 3s: Multiculturalism in provision of local services
Boroughs are advised to support the provision of social infrastructure and community facilities, where there are high concentrations of ethnic and religious groups requiring specific services.

Needs assessment and funding

New development and regeneration initiatives offer important opportunities to meet deficits in existing social infrastructure provision for disadvantaged communities, as well as considering additional social infrastructure to meet any new demand created. Local authorities need to have a good idea of local social infrastructure needs, to be able to identify gaps and meet deficits through the development process. In some areas, additional community facilities to those listed above may be necessary, including for example, sporting or cultural facilities.

The provision of appropriate levels of social infrastructure and community facilities are an important way to create sustainable communities. By carrying out assessments of need, in conjunction with consulting local strategic partnership members and community groups in the creation of the proposed sustainable communities strategies[23] – boroughs will have a clearer idea of their existing and future social infrastructure requirements. This will provide a basis for negotiations with developers as part of the S106 process.

The Social Infrastructure Framework being developed as part of the Thames Gateway Development Investment Framework. The London Thames Gateway Social Infrastructure Framework has an overall objective to promote healthy, successful and sustainable communities across the Gateway ensuring that a supporting network of high quality, accessible, and effective social infrastructure services and facilities accompanies population and residential growth.

Section 106

The use of S106 is one of the main tools for local authorities to ensure that the planning approval process delivers the most benefit for local communities from private or public sector investment. However, there are considerable pressures on S106 funding and a more detailed picture of social infrastructure and community facility requirements is necessary from boroughs to justify S106 requests. Local assessments of need should be conducted and regularly updated by LPAs to provide a sound basis on which to commence negotiations in terms of Section 106 obligations. This is also a key requirement of the local development framework and requires partnership working through the local strategic partnership. Authorities should also use the forthcoming standard planning charge to maximise community benefits from developments.

SPG Implementation Point 3t: Assessing social infrastructure need
Boroughs are advised to support the provision of social infrastructure and community facilities to meet existing deficits and future demand through local assessment of need. Boroughs are encouraged to carry out detailed audits and surveys of existing facilities and match these against user need through consultation with local communities.

Signpost
Healthy and Sustainable Food for London, The Mayor's Food Strategy, GLA, May 2006 http://www.london.gov.uk/mayor/health/food/index.jsp

Introduction to SIF, The Case for the Social Infrastructure Framework, Barriers and Hurdles to Social Infrastructure Planning and the SIF Toolkit can all be found at: http://www.healthyurbandevelopment.nhs.uk/pages/integrating_social_infrastructure/social_infrastucture.htm

3.9 Access to high quality open space

London's open spaces have many benefits and uses including managing flood risk, recreation and protecting and enhancing wildlife. Table 3D.1 of the London Plan sets out the public open space hierarchy for the provision of a range of different types of parks. Access to high quality open space can make a significant contribution to building strong, and socially cohesive communities, and can make a positive contribution to health and wellbeing. Research suggests that the health benefits of inner London's open spaces save the economy £9 million per annum and saves the NHS £1.8 million per annum[24].

Local communities should be encouraged to make the most of open spaces and locating appropriate facilities within them – such as cafes – is a good way to take advantage of the space provided and to provide informal monitoring of these spaces. The 'London's Life force' report was produced for local strategic partnerships by English Nature (now Natural England) and the London Wildlife Trust and demonstrates how open space can provide multiple opportunities to build social cohesion: http://naturalengland.twoten.com/naturalenglandshop/docs/LL1.pdf

Safety in accessing open space
But, in an urban environment, and especially in some of the poorer and more disadvantaged areas, it can be difficult to access open space due to lack of accessibility, poor management or fear for personal safety. The Mayor's Biodiversity Strategy seeks to improve access to nature, particularly where areas deficient in open space coincide with areas of regeneration, and offers proposals to address issues relating to safety and security in parks.

Pervasive fear of crime levels may make open spaces that are available feel too unsafe to some groups. Improving the quality of existing public open spaces and reducing deficiency areas in provision should include addressing safety and security concerns. The Children's Play Council's draft play indicator for the Audit Commission is that play provision should be no more than 60m in a straight line from home. This again reinforces the need to think about the design of local open spaces that accommodates a range of needs and uses. Please refer to the Mayor's draft SPG Providing for Children and Young People's Play and Informal Recreation (2006) for more detailed guidance. Open space and play strategies should include access and safety issues in considering the provision of facilities and the needs of the community.

SPG Implementation Point 3u: Maximising the benefits of open space
Boroughs and open space managers are advised to consider access, safety and security issues in order to maximise the potential value and benefits of open spaces to communities. For example as part of open space and children's play strategies and park management plans.

Signpost
The Mayor's Biodiversity Strategy - Connecting with London's Nature, 2002 http://www.london.gov.uk/mayor/strategies/biodiversity/docs/strat_full.pdf

Guide to Preparing Open Space Strategies, Best Practice Guidance, Mayor of London, March 2004 http://www.london.gov.uk/mayor/strategies/sds/open_space.jsp

Guide to Preparing Play Strategies, Best Practice Guidance, Mayor of London, April 2005 http://www.london.gov.uk/mayor/strategies/play/index.jsp

The East London Green Grid Framework, draft Supplementary Planning Guidance, Mayor of London, November 2006 http://www.london.gov.uk/mayor/strategies/sds/spg-east-lon-green-grid.jsp

Improving Londoners' Access to Nature, draft London Plan Implementation Report, Mayor of London, March 2007 http://www.london.gov.uk/mayor/strategies/sds/access-to-nature.jsp

A guide to producing parks and green space management plans, CABESpace, May 2004 http://www.cabe.org.uk/default.aspx?contentitemid=484&field=sectionsearchterm&term=park%20management&type=2

Providing for Children and Young People's Play and Informal Recreation Draft Supplementary Planning Guidance, Mayor of London, 2006
http://www.london.gov.uk/mayor/strategies/sds/docs/
spg-children-recreation.pdf

3.10   Access to public transport, walking and cycling facilities

London's streets should be performing a variety of functions. They should provide a safe and pleasant means of travelling by foot, cycle, bus or car and act as a network of attractive public spaces in which people can meet and enjoy life.

Access to good public transport links, along with the provision of direct, safe and well signposted walking and cycling facilities, is vital in areas of low-income housing, where people are less likely to have access to a car. Encouraging the provision of walking and cycling facilities in new developments, which serve the wider area, are an effective way to create social cohesion and to make contributions to improving the local air quality and road safety. Encouraging walking and cycling also has important health outcomes for local communities by encouraging levels of fitness and fresh air.

Provision of public transport and well-designed walking and cycling routes allow independence in travel choices. Walking and cycling routes need to be direct to relevant destinations such as local facilities. This ensures that people are able to access vital local services such as retail and employment opportunities. They also need to be well signposted and lit, with street furniture where appropriate/possible. Cycle parking facilities should also be provided at destination points to encourage use of cycle routes.

Shared spaces are another way that walking and cycling facilities can be encouraged although care should be taken to carefully balance the needs of different street users, including the needs of disabled and visually impaired people in particular. Home zones are another way that street safety can be made user-friendly for pedestrians and cyclists, with the added benefit of increasing social interaction by creating play areas for children (for more information please see Section 4.2: Children and young people).

Creating an attractive and accessible public realm has a part to play in getting people out and about, especially the more vulnerable members of the community who might experience isolation. In this way, local communities can build up community cohesion and social capital. For groups who may be unable to use public transport, community transport and door-to-door services are important and provision of waiting spaces

etc should be considered in development design. The design of public transport facilities also need to be sensitive to the needs of some groups, for example, bus stops need to be well lit and have seats.

The London Plan (2004) puts emphasis on providing essential access for people, goods and services and more localised modes of travel – the bus, walking and cycling – in central London and the larger town centres and the relevant policies are set out below.

London Plan Policy 3C.19 Improving conditions for buses
The Mayor will work with TfL and boroughs to implement Londonwide improvements to the quality of bus services for all. UDP policies should actively promote and give priority to the continued development of the London bus network, including:

- the allocation of road space and the high levels of road priority required for buses on existing or proposed bus routes
- ensuring good bus access to and within town centres, major developments and residential areas
- ensuring that walking routes to bus stops from homes and workplaces are direct, secure, pleasant and safe
- ensuring that bus layover and turning areas, driver facilities, bus stations and garages are available where needed.

London Plan Policy 3C.20 Improving conditions for walking
UDP policies should:

- ensure that safe, convenient, accessible and direct pedestrian access is provided from new developments to public transport nodes and key land uses, taking account of the need to connect people to jobs, to town centres and to schools
- identify, complete and promote high quality walking routes including the six strategic walking routes identified in the Mayor's Transport Strategy
- ensure that Thames-side developments incorporate provision for a riverside walkway in accordance with Countryside Agency standards
- ensure that the pedestrian environment is accessible to disabled people
- take account of measures set out in the TfL Walking Plan for London improve the safety and convenience of pedestrian routes to school.

> **London Plan Policy 3C.21 Improving conditions for cycling**
> UDP policies should:
>
> · identify and implement high quality, direct, cycling routes, where possible segregated from motorised traffic, giving access to public transport nodes, town centres and key land uses
>
> · ensure that routes are segregated from pedestrians as far as practicable, but are not isolated
>
> · identify, complete and promote the relevant sections of the London Cycle Network Plus, and other cycling routes
>
> · take account of measures identified in the TfL Cycling Action Plan
>
> · encourage provision of sufficient, secure cycle parking facilities within developments.

Bus stop accessibility

An accessible bus system is crucial for allowing equality of opportunity, and accessible bus stops are needed together with the accessible buses already operating in London to make this work. Transport for London are undertaking a Londonwide Bus Stop Audit of all 18,000 bus stops this year to determine the exact current level of service and enable a programme of planned improvements to reach 100 per cent accessibility to be developed with the best and targeted use of resources.

To reach 100 per cent accessibility across all of London's bus stops will require input and agreement by the boroughs (as well as TfL engineers on TLRN roads), and considerably higher levels of funding year on year until 2012. The results of the audit will also enable calculation of the shortfall in necessary funding to reach this target.

Minimum distance between raised entry crossings/speed humps and bus stops

The TfL Bus Priority Team produced guidance in September 2005 on 'Traffic calming measures for bus routes'. This sets out the acceptability, in terms of type and design, of the various traffic calming measures available to designers. There are a number of factors that affect the positioning of both bus stops and vertical traffic calming measures in a road. If a minimum distance between the two were set, this could lead to a compromise in general road safety. However, TfL has no powers to enforce the guidance that they provide in relation to traffic calming on bus routes. This document can be downloaded from the TfL website, using the following link:
http://www.tfl.gov.uk/assets/downloads/businessand partners/trafficcalmingmeasuresleaflet-rev-final.pdf

SPG Implementation Point 3v: Balancing transport user needs
Boroughs could make use of integrated approaches such as local area transport treatments to improve the balance struck between different street users, and seek opportunities to link these with other local initiatives. The design of new developments should follow best practice in creating an inclusive environment that prioritises walking, cycling and access to public transport. This includes initiatives like Home Zones, a concept described in paragraph 4G.48 and proposal 4G.9 in the Mayor's Transport Strategy. Contributions from developers should be sought to address any off site issues.

Signpost
The Mayor's Transport Strategy http://www.london.gov.uk/mayor/strategies/transport/index.jsp

Making London a walkable city: The Walking Plan, TfL, February 2004
http://www.tfl.gov.uk/streets/downloads/pdf/walking-plan-2004.pdf

Improving Walkability, TfL (September 2005) http://www.tfl.gov.uk/streets/downloads/pdf/improving-walkability2005.pdf

Creating a chain reaction: The London Cycling Action Plan, TfL, February 2004 http://www.tfl.gov.uk/cycles/downloads/reports/cycling-action-plan.pdf

London Cycling Design Standards, TfL, May 2005
http://www.tfl.gov.uk/cycles/company/standards.shtml

Living Streets are the champions of streets and public spaces for people on foot. This organisation works on practical projects to create safe, vibrant and healthy streets for all. http://www.livingstreets.org.uk/

RNIB – Street design research project
The Joint Mobility Unit at the RNIB will shortly be publishing a report of research into Home Zones and disabled people.
http://www.guidedogs.org.uk/index.php?id=2635

3.11   Access to retail, leisure and recreation facilities
London offers many opportunities to enjoy the city through its culture, sport, leisure, shopping, tourism and high quality natural spaces. As the city's population and economy grows and development intensifies, access to these activities offers release from the pressures of metropolitan life. These facilities enhance London's standing as a centre of culture and innovation. They ensure access to goods and services; offer space and activities,

opportunities for relaxation and socialising, and employment throughout London. It is therefore important that all Londoners are able to equally access and enjoy a diverse range of leisure and recreation opportunities.

London's network of town centres offer access to a variety of essential and non-essential goods and services for surrounding communities. Healthy town centres with a mix of uses including community services retail and leisure, can offer attractive focal points for communities. They also contribute to sustainability as they are focal points for access by public transport as well as walking and cycling. Town centres also provide a range of night time leisure facilities including pubs and bars, which can provide opportunities for social interaction and contribute to local economies.

To ensure that all Londoners are able to access retail and leisure facilities, the London Plan adopts a policy of 'structured choice', which concentrates the supply of retail and leisure facilities and services in the most accessible places and spreads them between central London, town centres and development areas such as the Thames Gateway. The plan sets out a network of around 200 town centres, recognising the different roles of district, major, metropolitan international centres. It recognises the need benefits and accessibility of district centres in providing essential goods and services to local communities.

Specialist leisure activities are supported and protected through the designation of Strategic Cultural Areas and Tourism Action Zones. These are complemented by local retail, leisure, recreation, sport and cultural facilities that provide particular benefits for local communities. London offers a wide range of opportunities for leisure, recreation and retail throughout the city.

Local sports facilities such as sports centres, playing fields, tennis courts, athletics tracks, swimming pools, children's informal play and recreation areas, skateboarding and cycling parks, ice-skating rinks and other indoor facilities have a key role to play in improving health and encouraging social interaction in local communities. Retail, particularly in district centres, provides London's diverse communities with opportunities to access healthy, affordable and culturally appropriate food (See section 3.8). Local social and cultural facilities including theatres, libraries, cinemas and bingo halls, together with restaurants and other leisure venues also enable social interaction and can be focal points for local communities.

Local culturally specific facilities can play an important role in preserving some of the unique characteristics of these areas, while also being tailored to effectively meet the needs of the local community. For example, an

ethnic, cultural or faith based facility might provide a meeting place for local voluntary groups, provide drop in centres for older people or homeless people and provide a youth club or other facilities for children and young people. Wherever possible, these facilities should be encouraged and protected in line with London Plan Policies 3A.15 and 3A.16.

Please also refer to SPG Implementation Point 3s, in Section 3.8.

Public transport and good walking and cycling facilities have a role to play in ensuring that people are able to access these facilities, whether they are at a local or more strategic level. Provision of facilities in town centres helps to make them more accessible and closer to other goods and services.

Creating employment opportunities

Another way that leisure and recreation facilities can play a role in reducing disadvantage in London is through the creation of employment opportunities. The people-oriented services are a major driver for jobs growth in London, particularly concentrated in entertainment, leisure and retail industries. Job growth in these sectors is spread widely throughout London and the sector provides regeneration as well as employment benefits. The LDA are working with employers to improve skills and training in the hospitality, leisure, travel and tourism sector.

Signpost

Managing the Night Time Economy, Best Practice Guidance, Mayor of London, March 2007 http://www.london.gov.uk/mayor/strategies/sds/bpg-nighttime-economy.jsp

London-wide Town Centre Health Checks 2006 Analysis, January 2007 http://www.london.gov.uk/mayor/strategies/sds/town_centre_assessment.jsp - town

Town Centres, Retail and Leisure, Draft Supplementary Planning Guidance (forthcoming)

4 Addressing the spatial needs of target equality groups

'Planning that is responsive to diversity will contribute to social inclusion'[25].

This part of the document looks in greater detail at the key spatial issues facing London's diverse communities, focusing on those people who experience exclusion and discrimination and are defined as 'target equality groups' by the Mayor in the London Plan.

4.1 The target equality groups

By considering different needs of these target equality groups and socially excluded groups, the planning system can help to reduce and eliminate the exclusion and discrimination many people continue to experience. The reasons for identifying target equality groups and meeting their needs have been set out in Section 1.1 above.

In line with the planning processes for equality and diversity set out in Part 2 and the spatial implications of social issues set out above in Part 3, each of the following sections focuses on the specific spatial needs of London's diverse community groups. For each of these equality target groups, relevant strategic data is set out, key strategic issues are identified and a series of SPG implementation points are presented where relevant, with references for further information. As the equality groups identified are not homogenous in character and each group overlaps with another, it should be remembered that individuals often experience multiple discrimination.

Some of the implementation points are more amenable to direct policies or actions in DPDs than others. But all need to be addressed in a holistic and more detailed way at the local borough level. These issues will also need checking against local issues and should receive the greatest attention in community strategies, statements of community involvement and local development documents.

The target groups specifically dealt with in detail in this section (in alphabetical order of the overarching equalities strand, ie age, disability, faith, gender, race and sexual orientation) are:

· Children and Young People
· Older People
· Disabled and Deaf People
· Faith Groups
· Women
· Black, Asian and Ethnic Minority People
· Refugees and Asylum Seekers
· Gypsies and Travellers
· Lesbians, Gay men, Bisexual and Trans People.

4.2 Children and Young People
Introduction
While children (from birth to aged 17) and young people (aged 18 to 25) value the range of things to do in London and like the excitement of living in a world-famous place, many are excluded from enjoying all it has to offer. Paradoxically, London, one of the world's richest cities, has one of the highest rates of child poverty in Europe.

Although the child population is forecast to fall by seven per cent nationally between 2001 and 2011, the child population of London is projected to continue to grow during this period[26]. The under-fives population, already proportionately larger, is projected to grow at a faster rate than other age groups and BAME children will account for an increasing proportion of London's child population growth to 2021. As such, it will be important to ensure that the needs of London's diverse children and young people are considered in spatial planning terms.

A. Children and Young People[27] – the facts
- Nearly a quarter of households with children in London and nearly a third in inner London, have no adult in employment. This compares to 16 per cent nationally[28].
- There are more children in London than in the majority of European cities, 1.62 million children under the age of 18 – almost a quarter of London's total population of 7.2 million and two-fifths of them (41 per cent) belong to a BAME group.
- Children from BAME groups are resident across the whole of London. Harrow, Brent, Ealing and Hounslow have high proportions of Indian children; Tower Hamlets and Camden have high proportions of Bangladeshi children; and the highest proportions of black Caribbean children live in Lambeth and Lewisham.
- London's schoolchildren speak approximately 300 different languages.
- After housing costs are taken into consideration, half (52 per cent) of children in inner London are living in households with incomes below the official poverty line, compared with 33 per cent in outer London and 28 per cent nationally.
- There are more children in London living in lone parent families (28 per cent) compared to England and Wales (23 per cent). In Inner London, the proportion rises to 35 per cent.
- More than a third (35 per cent) of London's children live in social rented housing and 29 per cent live in overcrowded households
- London has the highest rates of teenage drug dependency, homelessness and pregnancy in the UK as well as a high proportion

of other young groups with key needs, such as those leaving care, young refugees and young carers.

B. Key spatial issues for Children and Young People
The spatial implications that face London's children and young people are set out below.

1 **Child poverty** is a serious problem in London, most often caused when parents and guardians do not have **access to employment and training opportunities**. This can have serious implications on health, nutrition and levels of education attainment.

2 **Poverty and social exclusion** contribute to a complex profile of needs for the health, education and social care of many of London's disadvantaged children. The **provision of high quality social facilities**, including childcare, play and informal recreation, leisure, cultural and educational facilities across London is a clear determinant of children's future life chances.

3 Poverty can also lead to **overcrowded and poor quality housing conditions**, placement in temporary accommodation, often in disadvantaged areas where there are insufficient social facilities or public transport levels.

4 Being placed in these areas often means that there is a **lack of access to free and inclusive play space and open space**, which can hinder their mental and physical development and their independence.

5 Children and young people are often **unable to enjoy the public realm** due to **discrimination by adults**, with groups often being moved on in managed areas. The public realm can often be particularly inaccessible to disabled children.

6 Although there have been dramatic improvements in recent years, there are still concerns relating to **crime, safety and vulnerability** particularly in relation to street crime and road accidents. Fear of 'stranger danger' means that children are often prevented from going out and enjoying the public realm. Children from disadvantaged areas are also more likely to be killed or injured on roads near their homes.

7 Young people need to be provided with opportunities to be independently mobile. **Reliable, safe and cheap or free public transport** has a vital role to play in this.

C. What can spatial planning do?
There are several key spatial issues that are of particular importance to meeting the needs of children and young people. These issues will need careful consideration in the preparation of DPDs and are now set out below. Where planning can make a difference to meeting the needs of this equality group, implementation points are set out alongside the issues.

Access to employment and training

As worklessness is the main cause of child poverty, it is important to look at the reasons for this. Where possible, mixed use schemes should be encouraged that offer employment or training opportunities that fit the skills levels of local people. Providing small business start up units can be used as part of this process as can providing affordable childcare.

Please refer to SPG Implementation Points 3l, 3m, 3n, 3o, and 3p in Part 3.7; and SPG Implementation Point 4.6c, in Part 4.6.

Access to housing

Housing policy can make a real difference to the quality of children's lives, especially those who are living in poor quality, overcrowded and inappropriate accommodation. By increasing the supply of affordable housing of mixed tenures, there is greater choice for families to choose the types and location of homes they want. This means that at the local level, the mix of dwelling sizes needs to be appropriate to the profile of household size in the borough. Dwelling sizes also need to allow for space for children to carry out their homework without interruption and should have sufficient levels of play space and natural light.

Please refer to SPG Implementation Points 3j and 3k, in Part 3.6.

Access to social facilities

Children and young people have a need to access social facilities such as education, healthcare and recreation activities. In the case of schools, nurseries and healthcare facilities, it is important that provision is in line with demand and boroughs should use their monitoring of the local community demographic make-up (see SPG IP 2.b) to assess this.

Mobility levels, in terms of change of address, among London's children and their families are also very high – particularly among more disadvantaged groups. This leads to difficulties in accessing key services and to the potential for children and their families to 'slip through the net' and presents enormous challenges for service coordination. As part of the Every Child Matters initiative, there is an extended schools agenda and prospectus, which stresses access to opportunities and services for all with education facilities as a community base.

SPG Implementation Point 4.2a: Use of school facilities
Boroughs are encouraged, wherever possible to maximise the use of new and existing school facilities by either using school grounds for wider community use out of hours, or by encouraging multi-use centres for social and community facilities through S106 agreements in new developments. Social facilities should be easily accessible by public transport, walking and cycling and should be of an accessible design to help those with pushchairs, buggies, wheelchairs and guide dogs. Further info: http://www.everychildmatters.gov.uk/resources-and-practice/search/IG00046/

Transport and safety
The Mayor and Transport for London (TfL) have introduced free travel on buses and trams with a 16 to 17 Oyster photocard for 16 to 17 year olds in full-time education who live in London. Under-16s can travel free at any time on buses and trams. This covers the entire London bus network, including sections outside Greater London.

Under-11s can also travel free on the Tube and DLR during off-peak hours when they are travelling with an adult who has a valid ticket, or who has an Oyster pay as they go or Freedom Pass. However, there are some safety issues to be taken into consideration with children travelling alone – and education will play a part in this.

Walking and cycling are also important ways for children and young people to maintain their independence and keep fit and the implementation of Home Zones can address local safety issues.

Home Zones can also encourage community cohesion through traffic calming, changes in street allocation (reducing the dominance of the car, allocating more street space as play space and providing passive policing though encouraging communities to use the space around their homes). This will create a safer and more pleasant environment and ensure that children's needs are central to the redesigning of the built environment. The Mayor's Transport Strategy provides further guidance on Home Zones. However careful consideration needs to be given to ensure that the design of Home zones is accessible to disabled people, particularly visually impaired people.

Further info http://www.tfl.gov.uk/tfl/fares-tickets/2006/freetravel.shtml

SPG Implementation Point 4.2b: Walking and cycling routes
Development plans should ensure that routes and facilities are provided for children and young people's needs as well as those of others – particularly for short trips to local social facilities such as schools, colleges, healthcare centres, leisure centres and to recreational areas with open spaces.

SPG Implementation Point 4.2c: Addressing the impacts of the 'school run' and safe routes to school
Boroughs are asked to develop a range of initiatives in their community strategies relating to child mobility and the reduction of congestion and pollution caused by the 'school run'. Walking and cycling as part of safer routes to school programmes should be used wherever possible. Safer routes to schools and school travel plan initiatives should be detailed in the local implementation plan.

SPG Implementation Point 4.2d: Home Zones
Boroughs should consider Home Zones or similar initiatives where there are high percentages of children in the area and to ensure that these are accessible to all.

Access to play space facilities
Children and young people have the right, under Article 31 of the UN Convention[29] to engage in a range of play, leisure, cultural, and sporting activities. Access to open space, recreation and play space facilities is important to encourage physical activity and reduce levels of child obesity.

Children instinctively like to be within the heart of their neighbourhoods. They tend to play where there is a high probability that they will meet friends and other members of the community. This is why they often congregate in front of shops, on street corners and in other well-used public spaces. All children depend upon the suitability of these environments to be able to play[30].

This explains why putting children and their playgrounds 'out of sight and out of mind' leads to facilities that are little used and often vandalised. However, children also like the option of accessing or creating special and 'secret' spaces: dens and hideaways. Successful play places will take account of children's need to see and be seen without compromising the need for a rich and varied environment[31]. Play spaces that do not comply with these criteria are generally used by fewer children and are more vulnerable to vandalism.

Other commonly identified barriers to play, recreation and their enjoyment of public space include fears for their safety, especially from bullying; traffic; dirty, boring or run-down play areas and parks; lack of choice; and lack of access[32]. Research has also shown that certain minority ethnic groups are disproportionately excluded from play provision. For example, Asian children – and girls in particular – are widely discouraged from attending mainstream play services owing to a range of cultural and ethnic pressures, including overt and implicit racism[33].

The Mayor's Children and Young People's Strategy (January 2004)[34] sets out the Mayor's policy on children's play, based on the belief that all children should be able to play within their local neighbourhoods and have safe and attractive play spaces within easy walking distance of their homes. For older children and young people, having opportunities to meet friends and to enjoy and develop their own cultural and recreational pursuits is equally important. The Mayor has also produced a guide to preparing play strategies and included a new draft Policy 3D11i in the Further Alterations to the London Plan and draft SPG providing for Children and Young People's Play and Informal Recreation. Please refer to draft SPG Providing for Children and Young People's Play and Informal Recreation for more detailed guidance (2006).

Access to high quality open space
Large open spaces with sporting facilities are important to provide children and young people with the opportunity to engage in sports and exercise – especially for those who live in areas where there is not provision for these activities – which can disturb neighbours. It is important that London's parks and green spaces offer the necessary facilities and supervision to encourage their use by young people. A report by Groundwork (2002) has noted that while young people are often represented as the perpetrators of crime, they experience anti-social behaviour in the form of bullying from other age groups and from adults – ranging from the possibility of attack in unlit areas to adults allowing their dogs to roam loose in children's areas[35].

Crime prevention policies and actions and the encouragement of safety and security for the population as a whole will clearly also benefit children. In addition, particular care has to be taken to ensure that these issues are addressed in practical ways in and around the spaces and places where children congregate.

SPG Implementation Point 4.2e: Access to high quality natural space
Working with the London Parks and Green Spaces Forum, the Mayor will explore, with the London boroughs and others responsible for managing open space, ways to expand the provision of trained staff (park constabularies, London Wardens, Police Community Support Officers, outreach play workers and detached youth workers) to provide better engagement with, and increased supervision of, children and young people in parks and open spaces to increase accessibility and improve safety.

Please also refer to SPG Implementation Point 3u in Section 3.9.

Access to the public realm
Children and young people have the right to inhabit a shared public realm and to freely access streets and public places and spaces[36]. This access is significantly compromised for many BAME children who can often be victims of discrimination and race crime. A survey of 3,000 young Londoners[37] found that many children and young people have had experiences of racist abuse and bullying and that this inhibits their use of open space. There are also around 4,000 unaccompanied asylum-seeking children and young people in London and many more with families. Many experience a lack of respect and overt discrimination in public spaces.[38] Planning can help this by providing safe and accessible places for children and young people of different communities to meet. Providing community facilities may encourage appreciation of multiculturalism.

Children may also feel they are discriminated against as they rarely have access to space that they can call their own, or which they are welcome to share with adults, and that they are consequently characterised as posing a threat or a nuisance[39]. In these circumstances young people can adopt other spaces such as car parks, building sites and cemeteries as their own. This can lead other groups to feel threatened when in these spaces.

Research commissioned by CABE Space shows that 'place making' – improving the design, maintenance and supervision of parks and other public spaces – is a more effective solution to anti-social behaviour than simply increasing security measures[40]. Safeguarding London's open spaces and the creation of safer street networks can have direct benefits for the physical and mental wellbeing of children and young people. Please also refer to 'Providing for Children and Young People's Play and Informal Recreation: Draft SPG' for more detailed guidance (2006).

D. Further Information

Making London Better for All Children and Young People: The Mayor's Children and Young People's Strategy, 2004 http://www.london.gov.uk/mayor/strategies/children/index.jsp.

Providing for Children and Young People's Play and Informal Recreation Draft Supplementary Planning Guidance, Mayor of London, 2006 http://www.london.gov.uk/mayor/strategies/sds/docs/spg-children-recreation.pdf

The State of London's Children Report, Mayor of London, 2004 http://www.london.gov.uk/mayor/children/docs/state_london_children_full.pdf

Guide to preparing play strategies: Planning inclusive play spaces and opportunities for all London's children and young people, Mayor of London, 2005 http://www.london.gov.uk/mayor/strategies/play/docs/play_strategy.pdf

Child Poverty in London: Income and Labour Market Indicators, Data Management and Analysis Group, DMAG Briefing 2006/19-Summary, June 2006 http://www.london.gov.uk/gla/publications/factsand figures/dmag-briefing-2006-19-summary.pdf

Barnardo's, ChildLine, NCH, NSPCC and The Children's Society, with support from 30 other children's charities, have produced Towards an Inclusive and Child-Friendly London – A Children and Young People's Manifesto for the Greater London Authority. It can be found at http://www.childline.org.uk/pdfs/mayormanifesto.pdf

Involving young people in the design and care of urban spaces. CABE. http://www.cabe.org.uk/AssetLibrary/2103.pdf

Home Zones
http://www.londonplay.org.uk/projects/home-zone-london-project.html
http://www.homezonenews.org.uk/

Every Child Matters: Change for Children is a new approach to the well-being of children and young people from birth to age 19.
http://www.everychildmatters.gov.uk/

London Child Poverty Commission
http://www.londonchildpoverty.org.uk/

Office of the Children's Commissioner for England
https://www.childrenscommissioner.org/

4.3 Older People

Introduction

Older people make an important contribution to public life in London. Yet they face age discrimination in many areas, including in access to employment and public services, and are excluded from many aspects of London life by the cost of living in the capital. With older people aged 60 or over accounting for sixteen per cent of London's population (with three per cent of London's total population over the age of 80), the Mayor believes their contribution should be recognised and their spatial planning needs should be taken into greater consideration.

A. Older People – the facts[41]

- London has a smaller proportion of older people than elsewhere in the country and experiences net outflows of people at and above retirement age.

- Women's longer life expectancy means that they outnumber men in the older age groups. Women make up 57 per cent of all those aged 60 and over and 68 per cent of those aged 80 and over.

- London's white population, including Irish people, has an older age profile than other groups. In 2001, 90 per cent of London's over 65s were white and 10 per cent were from black and minority ethnic groups.

- By 2011, it is projected that white Londoners will account for 84 per cent of people aged 65 and over and black and minority ethnic groups for 16 per cent.

- The profile of older London will change dramatically in the coming years, particularly with the increasing proportion of older people from black, Asian and minority ethnic (BAME) groups – from 12 to 23 per cent by 2021[42].

- Fifteen per cent of 60 to 74-year-old women in London were still in employment at the time of the 2001 Census[43].

- In 2001, a third of older households were assessed as living in non-decent accommodation[44].

- Almost one in three persons aged over 80 are excluded from basic services compared to only one in 20 of those aged 50 to 59. One in four aged 80 and over are excluded from social interaction compared to almost one in ten of those aged 50 to 59[45].

- In 2000/01 the NHS spent 41 per cent of its budget (£12.4 billion) on people over 65[46]

· Almost a quarter (22 per cent) of 2,682 managers surveyed in 2005 admitted that they used age as a recruitment criterion. Almost half of those surveyed said they had experienced age discrimination in the recruitment process. Sixteen per cent of managers also claimed that age had an impact on redundancy or dismissal decisions[47].

B. Older People – the key spatial issues
The spatial implications for London's older people are:

1. Older people are disproportionately more likely to be living in **poverty** and suffering the associated effects of **low quality and inappropriate housing**. There is a shortage of sheltered and specialised accommodation for older people and many have to wait months for an occupational therapist assessment for necessary home adaptations.

2. Many older people live alone and experience **isolation**. Their **safety and security** can be a real concern, both at home and in public and open spaces, preventing them from leaving the house or feeling safe within it.

3. While many older people remain in work and continue to contribute to London's economy, many experience **discrimination** when it comes to gaining **access to employment and training**. Older people also contribute to the wealth of London's society through sharing their experience and skills, through work, volunteering and their role as carers and child minders in extended families

4. **Health and social care** often does not meet their needs by being poorly located and inaccessible, which can have damaging impacts on their health and wellbeing and prevent them from continuing to engage in society.

5. Convenient, cheap, safe and reliable **public transport** is a priority for older people alongside the provision of specialist transport services such as dial-a-ride.

6. London's **environmental quality** needs to be improved as does the **accessibility of the public realm**, and the provision of basic facilities such as accessible places to meet, public toilets and street furniture needs to be greater to accommodate the needs of older Londoners.

C. What can planning do?
The analysis above shows that at a strategic level there are five key spatial issues that are of particular importance to meeting the needs of older people. These issues will need careful consideration in the preparation of DPDs and are now set out below. Where planning can make a difference

to meeting the needs of this equality group, implementation points are set out alongside the main issues.

Access to appropriate housing

Older Londoners live in some of the worst housing in the country, often inappropriate to their changing needs[48]. There are large numbers of older people in London living alone and in isolation. Where these people wish to move to sheltered or extra-care accommodation, it is important that this is available for them in an area close to their existing social networks and that it is fully accessible and of good quality design. Housing for older people should not be isolated from the rest of the community. Older people are more likely to feel safe and to enjoy life and contribute to the community if they have positive relationships with younger people living around them.

Provision of both extra care housing and residential care is lower than nationally and there is a particular shortage of provision for BAME groups, for example to meet the needs of Chinese elders[49]. Numbers of older people from a particular ethnic community may not provide a critical mass of demand within one borough and cross-borough work may be required in considering culturally specific provision.

Specialist housing

When older people are housed in mainstream sheltered housing schemes and residential homes, these should be managed to meet the diverse and specific needs of this group – especially relating to food and cultural activities. Those who wish to remain in their homes should be provided with the support facilities they require to achieve this and to an appropriate and efficient adaptation service. The promotion of lifetime homes standards will in future, reduce the need for adaptations to property.

In addition, housing-related support services such as community alarm provision, or floating support such as wardens in sheltered and extra care housing (where a variety of models exist combining the security and independence of owning or renting, with the constant availability of care and support services), can enable older people to remain independent in their homes for longer.

SPG Implementation Point 4.3a: Housing for older people

Boroughs are asked to give consideration to the needs of older people in the design of new developments and encourage a range of housing options to be provided in new developments.

Under-occupation

A significant number of older people are living in under-occupied properties (i.e. those with two or more unoccupied bedrooms above the 'bedroom standard'). While many enjoy the additional space, for others under-occupation can be a problem. Some would find a smaller home easier to keep warm and cheaper and more manageable to run. Older people who currently live in larger properties (in both the social and market sectors) and wish to choose to 'downsize' to more manageable accommodation should be helped to do so. This in turn would have benefits for other equalities target groups in housing need by releasing much needed family homes.

However, a large proportion of under-occupied homes are privately owned and therefore beyond the scope of such schemes. Many London boroughs have schemes that provide incentives for older people living in the social rented sector to move somewhere smaller. These can be successful if tenants are offered attractive alternative properties in the right location and practical support throughout the moving process. There may be the opportunity to increase the scope of these schemes by developing properties that are attractive to older people.

SPG Implementation Point 4.3b: Reducing under-occupation

Boroughs are asked to assess the needs of older people who wish to 'downsize' and encourage the provision of suitable alternative accommodation in new developments. The Mayor's Housing Strategy will examine a range of opportunities to help facilitate this.

Access to social facilities

Older people require access to a range of facilities and services within their local area. These include: information, advice and advocacy, including services catering specifically for older people; post offices; good neighbour schemes; day care centres; other day centres and lunch clubs; cleaning and home help services; support for carers; community transport; handyperson and gardening projects; community safety and crime prevention work[50]. The provision of community-based leisure and recreational facilities, including facilities for religious practices, is also very important for London's older people, many of whom are not independently mobile. These services enable older people to maintain links with their cultural roots and their lives are enhanced by the social interaction.

Community facilities can also provide local and accessible centres for social interaction and provide a base for voluntary organisations and support services within the local community, especially for BAME older people. Provision of the capacity and premises for these activities is an issue that

local authorities should consider within planning proposals. Community halls can be used to provide a variety of these important services and activities and because of this, they are an important facility for London's older people, providing a chance to socialise within the local vicinity.

Older people also have a higher incidence of long-term ill health. It is important therefore that they are able to gain access to healthcare facilities and preventive health and wellbeing services by public transport or within walking distance.

Please also refer to SPG Implementation Point 3q in Section 3.8

Access to employment

Eleven per cent of London's older people (over 60) are still in employment; while more than 140,000 are providing care for other adults; 400,000 people aged 50 or over are involved in voluntary work; and the amount of unpaid care for grandchildren being provided by London's older people is worth an estimated £500 million. The provision of good quality and affordable facilities for the voluntary sector is one way that the planning system can contribute to keeping older people engaged and active within the community.

Labour Force Survey data for 2004 and a review of studies on learning and age, research by the Institute for Employment Studies (IES) concludes that myths about the ability of older people to learn new skills are preventing many from accessing training[51]. The need to care for an adult is an important barrier to continuing employment for many people. Increased provision of day-care services for adults would have similar beneficial effects to increased availability of childcare, and provision should be made where possible.

Please also refer to Implementation Points 3l, 3m, 3n, and 3p in Section 3.7.

Accessibility of the public realm

The design of the public realm can impact on the ability of older people to use it. It is important that public spaces are designed to be as accessible as possible, because older people are more likely to experience physical impairments – such as frailty, instability, impaired vision and hearing. The provision of seating (preferably in shaded spots for the summer) and public toilets is also important for older people to be able to enjoy the public realm. As older people are more likely to fear for their personal safety, is important that the urban environment is one in which consideration is taken to design-out crime. The inclusion of well-designed

spaces which are overlooked and provide good levels of social interaction are key to this process as they help to build up social capital. Public spaces must be managed and maintained to a high standard to prevent degradation of the environment and vandalism.

SPG Implementation Point 4.3c: New developments
Boroughs are asked to ensure that new developments take account of the need to promote independence among older people by ensuring accessibility and safety issues are addressed in the public realm.

Please also refer to Implementation Point 3f, in Section 3.4.

Public transport
The Freedom Pass is funded by the London boroughs and provides free travel on all public transport within the capital to Londoners over 60 and disabled people. Access to transport has long been identified as a key element in overcoming social exclusion and promoting a more inclusive London.

However, many older people have major concerns about the safety of using the public transport network, particularly older women and people from BAME groups. The Annual London Survey, carried out in 2004 by MORI for the GLA found that 25 per cent of people aged 65 or over identified personal safety on transport as the biggest issue relating to public transport in London.

Badly lit streets, isolated bus stops and stations, long distances to walk, feeling intimidated by other passengers and the perceived lack of a police presence can add to the sense of fear felt by some older people. Older people are also restricted in their ability to use the transport system owing to mobility issues and a lack of facilities such as toilets, handrails and seating.

Planning can be used to address many of these issues and encourage older people to use public transport by ensuring that their needs are incorporated into the design and improvement of public transport facilities.

D. Older People – Further Information
Valuing Older People: The Mayor of London's Older People Strategy, 2006
http://www.london.gov.uk/mayor/strategies/older_people/
docs/ops.pdf

Accessible London: Achieving an Inclusive Environment: Supplementary Planning Guidance, 2004 http://www.london.gov.uk/mayor/strategies/sds/accessible_london.jsp

Best Practice Guidance - Wheelchair Accessible Housing, Mayor of London, 2007 http://www.london.gov.uk/mayor/strategies/sds/bpg-wheelchair-acc-housing.jsp

Supporting Diversity in Tower Hamlets – Sonali Gardens

The Health and Social Care Change Agent Team (CAT) was created by the DoH to improve discharge from hospital and associated arrangements. Sonali Gardens - An Extra Care scheme for Bangladeshi and Asian Elders http://www.cat.csip.org.uk/_library/docs/Housing/Case_study_07.pdf

4.4 Disabled and Deaf People
Introduction
Disabled people continue to be excluded from many mainstream activities that other Londoners take for granted. Many lose out when it comes to work, housing, leisure, health and social care and are frequently denied the opportunity to participate fully as equal citizens. All too often, the design of the built environment and transport either ignores the needs of disabled people and creates barriers to inclusion or provides access in a segregated and separate way, making disabled people unnecessarily dependent on others.

The Mayor of London has produced supplementary planning guidance on creating accessible environments (see Section 3.4 for further information) which is based on the social model of disability, which states that:

- disability is a social phenomenon
- while many individuals have physical or sensory impairments or learning difficulties or are living with mental health needs, it is the way society responds to these which creates disability and not an individual's particular impairment
- disablism is a form of oppression in the same way as for example racism, sexism and homophobia.

In this model, disability is characterised as resulting from the exclusionary way in which society organises itself, where a lack of practical access to the social world, or prejudice against disabled people, can be seen as disabling processes that create inequality. In other words barriers or elements of social organisation, which take no or little account of people who have impairments, cause disability. Barriers might include, but not be confined to, prejudice and stereotypes, inflexible organisational

procedures and practices and inaccessible information, buildings, public realm and transport.

In a similar way, there are two main approaches to deafness:

·   The medical model of deafness defines deafness in terms of a sensory deficit, which is measured by how much someone's hearing deviates from the norm, using words such as 'hearing loss', 'impairment' (in the context of deaf people), 'audiology', 'decibels', profound', 'severe', 'moderate'.

·   The cultural model, sometimes known as the 'social model' defines being deaf as a positive way of experiencing the world visually. It is linked to sign language, lifestyle, history and a sense of belonging. People who share this culture are proud to be part of the Deaf community.

The GLA recognises that Londoners who use BSL as their first or preferred language are a linguistic and cultural minority and do not identify as disabled people, although they share similar oppression. There is a great deal of pride in the Deaf community, and a strong Deaf identity within the individual.

Deaf people have struggled to overcome a history of oppression by people who have misunderstood the language, believing it to be nothing more than a collection of ungrammatical gestures. For most of the 19th century, BSL was used in schools and widely accepted in society. However, for most of the 20th century, hearing educators banned BSL in schools for Deaf children, insisting that they should speak and lip-read instead. Children were ridiculed and punished for signing in schools, but the language did not die out. Today, the campaign by Deaf people to be accepted as a linguistic minority has led to BSL being used increasingly in public places and now broadband video offers the ability to communicate through BSL in the same way that the invention of the telephone offered communication through speech to hearing people.

A. Disabled and Deaf People – the facts

·   There are estimated to be around 395,000 disabled women and 415,000 disabled men of working age in London representing 17.1 per cent and 16.3 per cent respectively of the working age population[52].

·   In 2001/02, 12.2 per cent of disabled men and 9.6 per cent of disabled women in London were classified as unemployed, compared with 6.8 per cent of non-disabled men and 5.4 per cent of non-disabled women. Nationally, 52 per cent of disabled women and

44 per cent of disabled men are classified as 'economically inactive' but a third of these people do want a job[53].

· The prevalence of disability tends to increase with age, from 19 per cent of those aged 60 to 64 to 78 per cent of those aged 85 and over. Altogether there are estimated to be around 456,000 disabled people aged 60 and over in London, of whom nearly two-thirds are women[54].

· There are approximately 50,000 disabled children living in London, around three per cent of the under 18 population[55].

· An estimated 13 per cent (412,400) of London's 3.1 million households contain at least one person who is in an identified 'special needs' group and nearly a third (130,000) of these households live in unsuitable housing[56].

· In a recent survey of disabled people, nearly 40 per cent of all households containing someone with mental health problems live in unsuitable housing and 21 per cent of all respondents mentioned the lack of accessible housing as a major problem for disabled Londoners[57].

· There are estimated to be about nine million deaf and hard of hearing people in the UK. The number is rising as the number of people over 60 increases[58].

· About 3.5 million people of working age (16 – 65 years) are deaf or hard of hearing. 160,000 of these are severely or profoundly deaf.

· Deaf people have an unemployment rate of 19 per cent, which is four times the national average for people who are not deaf or hard of hearing, and not disabled. Nearly a third of those deaf people who were in full-time work in 2002 earned under £10,000 per year compared to 11.8 per cent of the UK general population[59].

· A high proportion of severely or profoundly deaf people have other impairments as well. Among those under 60, 45 per cent have additional impairments – these are more likely to be physical disabilities. Among severely or profoundly deaf people over 60 years, 77 per cent have some additional disability. For 45 per cent, this means significant dexterity or sight difficulties, or both[60].

B. Disabled and Deaf people – the key spatial issues
The following section sets out the spatial implications of disadvantage and social exclusion for London's disabled community.

Towards Joined-up Lives is a social-model based, qualitative research study commissioned by the GLA and launched at Disability Capital 2006. It is about the experiences of disabled Londoners in housing, post-16 education, and employment. It revealed the following:

1 Disabled people are twice as likely to experience **worklessness** as non-disabled people, they are more likely to live in **unsuitable or**

inaccessible housing without essential amenities, and have difficulty using many public transport facilities with ease. Deaf people are four times more likely to be unemployed than hearing people.

2   There is a serious **shortage of accessible housing** for disabled people, leading to a **lack of choice and inappropriate housing**. Surrounding environments are often not fully accessible and do not include accessible and well-maintained open space.

3   While significant improvements in public transport have been made – there are still some **inaccessible environments** that present barriers to mobility. Provision of **blue badge parking** is crucial for those people who have to rely on private cars.

4   **Access to social facilities and services** for disabled and Deaf people across the city are inconsistent and not co-coordinated, and in some cases neglect can lead to isolation and social exclusion. Easily accessible, comprehensive, accurate and timely information advocacy and support enables disabled people to achieve equal citizenship. This is especially true for deaf people who require specialised equipment such as textphones or videophones. The **community and voluntary sectors** may have an important role to play in this.

5   Disabled and Deaf people continue to experience **high levels of discrimination, harassment and lack of awareness** and understanding from the general public and professionals. This can limit their ability to enjoy the public realm and excludes them from participating fully in society.

6   **Inaccessible facilities** limit disabled people from accessing education and training opportunities.

C. What can planning do?
The analysis above shows that at a strategic level there are six key spatial issues that are of particular importance in meeting the needs of disabled people. These issues will need careful consideration in the preparation of DPDs as set out below. Where planning can make a difference to meeting the needs of this equality group, implementation points are set out alongside the main issues.

Please also refer too Section 3.5: An Accessible Inclusive and Safe Environment

Accessibility of public transport

Barriers for disabled people to access the built environment need to be removed to enable equal access and independent mobility. These improvements will also have benefits for other groups, including people with pushchairs and older people. For more detail on the accessibility of the public realm, please see Sections 3.4 and 3.8.

TfL have made significant efforts to improve the accessibility of London Buses in recent years. The TfL Disability Equality Scheme action plan has responded to some of the long-term issues relating to the accessibility of London's buses for disabled people. It has also responded to transport issues raised by the Another Planet Survey in 2003, such as difficulties experienced while trying to use ramps, by implementing strict monitoring procedures to ensure that ramps are fully functioning before buses are allowed to leave the garage, with financial penalties applied if this is not the case. In addition, ensuring that bus drivers are trained in equality issues has contributed to making London's buses more accessible for disabled people, by increasing driver awareness of wheelchair users' needs.

However, there are still some improvements to be made. To tackle the potential issues between wheelchair users and other passengers, such as wheelchair spaces taken up by buggies, TfL are sponsoring research to understand how to promote better understanding between non-disabled customers and wheelchair users and other customers who may need to use priority seating.

Local authorities will need to work with TfL to ensure that local transport is accessible and will need to assess the need for provision of more localised and specialist transport services, such as dial-a-ride or shop-mobility schemes. In addition, many disabled people have to rely on the use of the car and lack of accessible car parking space can be limiting. Provision of blue badge parking is therefore essential. Parking standards for blue badge holders are set out in the London Plan.

SPG Implementation Point 4.4a: Blue Badge Parking
Boroughs are advised to ensure that new developments incorporate adequate blue badge parking, either on or off street, to enable disabled people to use the development.

Access to appropriate housing

There is a serious shortage of accessible housing in London and as a result – a lack of choice – with disabled people often being housed in inappropriate accommodation. Many more homes require adaptation to make them appropriate and disabled people report delays, cost and

poor quality of adaptations to housing as well as ongoing problems with maintenance.

In addition, some local authorities housing services do not offer sufficient support and advice for disabled people, often resulting in a lack of information about housing options and rights. Any information that is available is difficult to get and can be provided in inaccessible formats. Disabled people have also experienced harassment by neighbours, lack of personal security and poor police and local authority responses[62].

In 2005 the Mayor published a report on the housing needs of Londoners, which contains important new information about the housing needs of disabled people. It sets out the number of households with one or more disabled residents broken down into descriptions of 'special needs' groups: frail elderly, physically disabled, learning disability, mental health problem, severe sensory disability and other. It is acknowledged in the report that these definitions, which focus on impairment, are at odds with the social model of disability, but they are of necessity drawn from the categories used in the borough housing needs surveys[63].

The use of lifetime homes – please refer to Implementation Point 3j as well as London Plan Policy 3A.4 – will improve accommodation standards for all groups, especially families and improve the possibility for such accommodation being used by disabled people, reducing the need for costly adaptations over time.

Please also refer to Implementation Point 3j, in Section 3.6.

Access to open space and recreation facilities
Disabled people are often excluded from enjoying open spaces and other recreational facilities – and yet it is important for disabled people to be able to enjoy the benefits of exercise and being in the natural environment. It is also important that disabled children are able to engage in play and recreation in an inclusive environment. This is because disabled children are especially vulnerable to negative attitudes and inaccessible physical environments, which compound the general problems experienced by most children.

In London, as across the UK as a whole, there is evidence that disabled children do not enjoy equality of access to play and leisure activities. A recent survey of 1,000 parents of disabled children demonstrated how their children were excluded from ordinary leisure opportunities. Parks and playgrounds were the least user-friendly, with few facilities for disabled people . The provision of accessible play space will help to reduce the

enormous social and physical barriers to the enjoyment of their right to play independently.

SPG Implementation Point 4b: Managing accessible and inclusive open spaces
Boroughs are recommended to ensure that open spaces are well managed and designed to allow access for disabled people. Including the provision of walkways and paths that are level and clear of obstructions and access to sports and recreation facilities. For children, the same principles apply.

Accessing public services
In the Another Planet Survey[65] 40 per cent of respondents said that their health and social care needs were not met. In relation to local facilities, only supermarkets (at 53 per cent) were judged to be fully accessible by those asked and only 36 per cent of health centres were judged to be fully accessible.

Although these statistics are not London wide they give a clear indication of the lack of accessible local amenities and the need for positive action to address the barrier faced by many people on a daily basis. Boroughs are encouraged to examine the accessibility of social infrastructure and community facilities as part of their assessments of community need.

Please also refer to SPG Implementation Point 3q, 3r, 3s, and 3t in Section 3.8.

Access to employment and training
Inability to access many of London's opportunities, including the opportunity to work, restricts the independence of disabled people and means that instances of poverty, social exclusion and isolation among disabled people is higher than average, with many disabled people restricted to certain local areas.

In research carried out for the Disability Capital's 'Towards joined up lives' report (March 2006) it was noted that facilities provided by Jobcentre Plus and Disability Employment were often inaccessible and that personnel lacked understanding of disability issues. Attitudes and lack of awareness on the part of both employers and colleagues were also major barriers, especially as employers were perceived as being unwilling to introduce greater flexibility of working practices, to commit resources to make work places accessible, or to invest in equipment.

As a result of these kinds of problems, disabled people are more likely to be unemployed than non-disabled people. To help disabled people gain

access to employment and training facilities, it is important that new employment and training facilities are fully accessible for all.

Please also refer to SPG Implementation Point 3l, 3m, 3n, 3o, and 3p in Section 3.7.

Discrimination and hate crime

Disabled people not only face discrimination and physical barriers to access and full participation in society, but they may also experience direct hostility and physical attacks. A survey by Mencap found that nearly nine out of ten respondents had experienced bullying in the last year and nearly one in four had suffered a physical attack.

Wherever possible, public spaces should be designed to be overlooked and well-used, with direct routes, safe street-scaping and good lighting. This will help disabled people to feel more confident in the urban environment and will work well alongside other public policy measures to reduce discrimination by increasing the 'visibility' of disabled people.

Please also refer to SPG Implementation Points 3h and 3i in Section 3.5.

D. Further Information

Accessible London: Achieving an Inclusive Environment, Supplementary Planning Guidance, April 2004 http://www.london.gov.uk/mayor/strategies/sds/accessible_london.jsp

Towards joined up lives (qualitative research study) http://www.london.gov.uk/mayor/equalities/joined-up-lives.jsp

Another Planet? Disabled and Deaf Londoners and discrimination: The interim results of the Disability Capital 2003 survey http://www.london.gov.uk/mayor/eydp-2003/disability_capital_report.jsp

Best Practice Guidance - Wheelchair Accessible Housing, 2007 http://www.london.gov.uk/mayor/strategies/sds/bpg-wheelchair-acc-housing.jsp

Case study examples, lifetime homes http://www.lifetimehomes.org.uk/

Wheelchair housing design guide, Habinteg Housing Association http://www.habinteg.org.uk/pages/whdg.html

Sense is an organisation has a worldwide reputation for its expertise in working with deafblind people. They also work with people with single sensory impairments and a wide range of other difficulties - including physical disabilities, learning disabilities, and challenging behaviour. http://www.sense.org.uk/

The Royal National Institute for Deaf People http://www.rnid.org.uk/

Mencap http://www.mencap.org.uk/

The Office for Disability http://www.officefordisability.gov.uk/docs/betteroutcomesreport.pdf

4.5 Faith Groups
Introduction
Multi-cultural communities are often multi-faith communities and this should be fully recognised in policies aimed at promoting diversity. Fostering understanding and respect between different faiths is vital in practically implementing community cohesion strategies.

Communities and Local Government aims to help bring about a society in which different belief systems, whether religious or otherwise, are understood, respected and valued[66].

For the first time the Census in 2001 included a question on religious affiliation and over three-quarters of respondents reported having some religious affiliation. The facts below are derived from the results of this census.

A. Faith Groups – the facts
· Nearly 60 per cent of Londoners say they are Christian, 8.5 per cent Muslim, 4.1 per cent Hindu, two per cent Jewish and one per cent Sikh.
· Nearly 16 per cent had no religion and nine per cent gave no answer.
· The boroughs with the highest proportions of Muslims, Hindus and Jews in England and Wales are all London boroughs. After Slough, three London boroughs have the highest proportions of Sikhs.
· London's children are more highly represented than children nationally in all religious groups (excepting Christianity) and one-fifth of inner London's children are Muslim, compared to just five per cent in England and Wales[67].

B. Faith groups – the key spatial issues
The following section sets out the spatial implications of disadvantage and social exclusion for London's faith groups, some of which are similar to the issues set out Section 4.6 for BAME communities.

1. **Discrimination** because of religious belief has wide ranging impacts on people[68].

2. Access to **appropriate housing** can be one of the ways in which this indirect discrimination manifests itself – especially in relation to **overcrowding** among populations with high fertility due to religious and cultural restrictions on contraceptive use.

3. People from faith groups are likely to require **specialised service provision**, including facilities for cultural practices, community activities and **provision for places of worship** – that are easily accessed by the communities which require them.

4. The **definition** of 'places of worship' in the planning system is based on an old fashioned Church of England model of provision, and often does not adequately reflect the wider needs of faith groups and the very different patterns of worship that are beginning to crop up.

5. Some faith groups also require specialised retail facilities and can create **local markets for goods and services.**

6. The provision of appropriate **burial space** is a key concern for some faith groups.

C. What can planning do?
The analysis above sets out the strategic spatial issues that are of particular importance to meeting the needs of faith groups. These issues will need careful consideration in the preparation of DPDs and are set out below in greater detail. Where planning can make a difference to meeting the needs of this equality group, implementation points are set out alongside the main issues.

Access to housing
Certain faith groups tend to have larger families and therefore require larger dwellings and increase pressure on social and community facilities. For this reason, areas with high fertility rates (whether as a result of religious practices or not) need careful planning to ensure that housing demand is met by supply, and is of the right type and tenure. Play space facilities, and access to social facilities are important for these groups – just as they are for others. The needs of older people from different faith groups also need consideration, especially in relation to provision of culturally specific extra-care homes and borough planners may need to

work together with housing departments and service providers to ensure sites are found to cater for these groups.

For other faith groups, it is important to live within a certain distance of their place of worship. This can have planning implications as communities expand and pressure for space develops within a restricted area. Wherever possible boroughs experiencing these pressures should try to accommodate the additional necessary housing and should engage with affected groups to ensure future demand is met.

SPG Implementation Point 4.5a: Access to housing
Faith groups have different needs and boroughs should make this distinction, for example in the type and sizing of housing required. An assessment of need may be the most suitable way to determine what types of dwellings are required. Advice should be sought from organisations that support faith groups such as the Joseph Rowntree Foundation (see in further information below).

Please also refer to SPG Implementation Points 3j and 3k in Section 3.6.

Access to social and community facilities
Faith groups tend to require some specialist social and community facilities. Wherever possible, an approach to planning which encourages multiculturalism and diversity will allow necessary services to be provided by local people, especially if some affordable community accommodation is provided. By allowing provision for these facilities, planning can help to preserve the identity of local areas, and can help with aspects of community cohesion.

Some faith groups have particular health service needs associated with their faith and local service providers should be aware of and able to respond to these needs. Leisure and recreational facilities should also be aware of the faith group needs within their catchment areas and tailor services accordingly.

SPG Implementation Point 4.5b: Supporting food markets and retailing
Boroughs are advised to identify the needs of local communities and where appropriate to encourage the provision of and access to faith based food markets and retailing, perhaps through local strategic partnerships.

Please also refer to SPG Implementation Point 3b, 3c, 3d and 3e, in Section 3.2.

Places of worship

Places of worship are an important requirement for most faiths. Where facilities already exist, these should be protected as an important part of the local community need. Places of worship that are in decline should be encouraged to consider converting to multi-denomination to preserve the facility for their own faith and for others. Provision of new multi-denomination places of worship should be considered as part of new developments, to serve as a wider community facility and encourage community cohesion. Where this is the case, buildings provided should be iconic and follow the principles set out in the Sustainable Design and Construction SPG.

In London, models of religious worship are changing and large congregations are developing for some faiths. These groups require large spaces to accommodate all worshipers in their services and in many cases experience difficulties in finding appropriate sites. Where sites can be found, issues of transport accessibility mean that the most suitable locations for these large-scale places of worship are often close to good public transport links. In identifying suitable sites, public transport accessibility should be an important factor (as a central criterion in a 'sequential approach'), although it is recognised that good public transport accessibility may not always be possible due to the limited availability of suitable sites. In any case, the implementation of a green travel plan will minimise the impacts of these facilities on the local area.

SPG Implementation Point 4.5c: Supporting places of worship
Boroughs are advised to identify significant clusters of faith groups and identify sites that will encourage the provision of suitable places of worship and meeting places (separate from or integrated with places of worship). Where appropriate, multi denomination places of worship should be encouraged, which can also serve as wider community facilities, especially as part of regeneration schemes.

Burial Grounds

The four main religious groups in London that require burial space are the Jewish, Muslim, Buddhist and Roman Catholic communities; although Zoroastrian and Hindu religions also have burial requirements.

However, some boroughs have run out of burial space, and reserves in other boroughs will run out over the next few years. For central and inner London boroughs, this means that provision is often made in outer London, and this can cause serious problems of access, maintenance and exceptional costs. This has a disproportionate effect on people in London's poorest boroughs and on some of London's poorest communities who rely on access to this facility, such as the Bangladeshi community in east London.

Boroughs should continue to make provision for burial in line with London Plan Policy 3D.15 Burial space and ensure ongoing accessibility for local communities. Provision for communities with specific faith requirements should be safeguarded, pending any changes in the law relating to the re-use of burial plots in the UK.

Tackling discrimination and harassment on religious grounds
Part 2 of the Equality Act 2006, made it illegal to discriminate on the grounds of religion or belief in education, the provision of goods, facilities or services, the management of premises and the exercising of public functions.

However, there are still issues for people of faith groups relating to their personal security in the public realm, especially in dealing with the negative affects of religious intolerance for example, Islamophobia and anti-Semitism. In 2005/06 there were 1,006 faith hate crimes reported in London. During the first quarter of 2005/06 the number of faith hate crimes increased by 24 per cent (450)[69]. This has been partly attributed to the 7 July London bombings, despite universal condemnation by all major faith group leaders at the time, and partly due to efforts to encourage reporting.

Improving the design of the public realm has a part to play in ensuring the safety of all people, but wider measures to increase understanding and foster respect are the only ways to eliminate hate crime.

> **Please also refer to SPG Implementation Points 3b, 3c, 3d and 3e in Section 3.2 and 3h and 3i, in Section 3.5.**

Inter faith co-operation and community cohesion
The traditions of all major faiths contain teachings commending the fundamental values of equality and respect. These are key elements for the creation of community cohesion. There are now a large number of inter faith and multi faith local bodies in the UK which play a key role in bringing people of different faiths together to:

- increase trust, mutual understanding and respect;
- help defuse inter-community tensions; build community cohesion; provide advice and information on religious issues;
- foster co-operation on local issues and;
- work jointly on social and educational projects.

The experience and resources of the faith communities are invaluable and should be given the opportunity to participate fully in society through voluntary activity and other faith based projects.

Please also refer to SPG Implementation Point 3b, 3c, 3d and 3e in Section 3.2.

D. Further Information
The Inter Faith Network for the UK links representative bodies of the faith communities; national, regional and local inter faith organisations; and educational and academic bodies with a focus on inter faith and multi faith issues. It works with its member bodies to contribute to community cohesion through deepening inter faith understanding and cooperation at all levels. www.interfaith.org.uk

The Local Interfaith Guide, Faith Community Cooperation in Action, 2005
http://www.interfaith.org.uk/publications/lifg2005.pdf

Working Together: Cooperation between Government and Faith Communities, Home Office Faith Communities Unit, February 2004
http://www.communities.gov.uk/pub/627/WorkingTogetherCooperationb etweenGovernmentandFaithCommunities_id1502627.pdf

The Faith Based Regeneration Network has produced a toolkit for engaging faith groups in regeneration:
http://www.fbrn.org.uk/publications.htm

Engaging Faith Communities in Regeneration, Joseph Rowntree Foundation, 2006
http://www.jrf.org.uk/knowledge/findings/housing/413.asp

Faith Regen Foundation is an innovative multi faith national charity working in partnership with BAME and faith communities to address poverty http://www.faithregenuk.org/frf.html

For further information regarding the limitations experienced by some BAME and faith groups to consumer credit see the Joseph Rowntree link below: http://www.jrf.org.uk/knowledge/findings/socialpolicy/sp104.asp

Muslims in London Report http://www.london.gov.uk/gla/publications/equalities/muslims-in-london.pdf

2001 Census profile: The Jewish population of London Data Management and Analysis Group, 2006
http://intranet.london.gov.uk/media/09D/A9/3/DMAG Briefing 2006-27 2001 Census profile - Jewish population of London.pdf

The Muslim Council of Britain campaigns for British Muslim rights and integration. http://www.mcb.org.uk/

4.6 Women
Introduction
There are over three million women in London, coming from a huge range of backgrounds, faiths and cultures. The way women live their lives depends on public policy and the future of London's public services will be an important determination in planning for their needs. In the domestic arena, women still have the main responsibility for supporting children, older people and those with limiting illness. Women are also more likely to do the family shopping and transport children alongside working and are an important component of the part-time labour market.

Women are set to make up a growing number of London's population and a growing proportion of the total number in employment[70]. Women aged 16 and over in London make up 51 per cent of the adult population and by 2016 women are expected to make up 48 per cent of all those in employment. This demonstrates that London can present many opportunities for women's advancement, with its thriving and diverse economy, matched by a huge variety of social, voluntary and community activity. However, there remain some important spatial issues to be addressed to make real progress towards equality for women in London.

A. Women – the facts[71]
· Over 26 per cent of London women are aged 16 to 29 compared to 21 per cent in England. This is partly because many younger women are attracted to London because of the opportunities to work and study.
· London's women are a diverse group and by 2021, BAME groups are expected to make up 35 per cent of the adult female population.
· Older women aged 60 and over make up just over 21 per cent of women in London, compared with 28 per cent in England as a whole. These women are more likely to live alone and in poverty than other groups.
· Just over 12 per cent of women aged 16 to 59 were living alone in

London at the time of the 2001 Census and a further nine per cent were lone mothers living with their dependent children but no other adults.

· Women are significant contributors to London's economy. They represent 46 per cent of all taxpayers in London. However, on average in London, women earn only 77 per cent of men's earnings per hour. This means less ability to buy a home, less savings for retirement and personal investment.

· In January 2006, the average cost of a day nursery place for a child under two was £197 per week in Inner London and £174 in Outer London, compared with an average of £142 per week in Great Britain[72].

· As well as those looking after children, many women provide unpaid care for sick or disabled relatives or friends[73].

· Women make up over 67 per cent of the workforce in the public services sector, with black and minority ethnic women particularly highly represented, most notably in the health and caring services.

· Women are the greatest users of public services. Therefore low pay rates and poor services affect women directly.

B. The key spatial issues

The following section sets out the spatial implications of disadvantage and social exclusion for London's women.

1 Many women have to balance **work and domestic responsibilities**. To do this, they ideally need to be able to **access employment and training opportunities** close to home. The provision of part-time work opportunities, business start up units and community and voluntary sector facilities can be used to promote women's employment and reduce poverty and social exclusion.

2 With **provision of childcare** falling behind the national average in London, its resulting increased cost has become a major barrier to women's employment. **Access to affordable childcare** is a key factor to London's women engaging fully in the labour market and continuing to make a contribution to London's economic growth.

3 The nature of women's trip making patterns – often making a range of complex local journeys – means that they need **access to convenient, affordable and safe public transport**. Women also require **safe and accessible walking and cycling routes** to cover most local journeys from the home for work, shopping, leisure and childcare.

4 Women are more likely to live in **social housing** – due to factors such as lower wages and restricted employment opportunities – therefore they are more likely to experience the effects of **poor quality, inaccessible housing and lack of choice** over location for themselves and their families.

5 Many women's experiences of London are affected by concerns about **crime and personal safety**, particularly at night in the **public realm** and when travelling alone on **public transport**. Many urban areas are not well designed for personal safety in terms of visibility, lighting and being overlooked. This can cause feelings of vulnerability and prevent women entering certain areas at certain times.

6 As women have complicated lives and often multi-task, carrying out domestic chores throughout their day, **access to good local services** is vital to them. Access to healthcare, education facilities (for themselves and/or children) and other services, including leisure, education and cultural services.

C. What can planning do?
The analysis above shows the key strategic spatial issues that are of particular importance to meeting the needs of London's women. These issues will need careful consideration in the preparation of DPDs and are now set out in greater detail. Where planning can make a difference to meeting the needs of this equality group, implementation points are set out alongside the main issues.

Access to appropriate housing
Many women in London live alone with the proportion increasing, as they get older. At the time of the 2001 Census, just over 12 per cent of women aged 16 to 59 were living alone in London. This rose to 33 per cent of women aged 60 to 74 living alone, 54 per cent of those aged 75 to 84, and 59 per cent of those aged 85 and over. Older women living alone are more likely to be living in poverty and provision of appropriate shared accommodation might be financially and socially beneficial for some groups. Some developments planned in London are specifically aimed at working age women and have been designed particularly to cater to their needs.

SPG Implementation Point 4.6a:
Research on gender specific developments
Boroughs are recommended to investigate the benefits of these kinds of developments and if found to be beneficial, they could be encouraged.

Women-headed households tend to be more reliant on social housing – local authority and housing association accommodation. This applies in particular to lone parent households, 60 per cent of whom live in social housing, compared to 23 per cent of other households with dependent children. For these households, larger size dwellings are more appropriate and can reduce the stress of living in overcrowded conditions.

Please refer to SPG Implementation Point 3k in Section 3.6.

The total number of households accepted by London local authorities as homeless and living in temporary accommodation stood at over 63,400 in November 2005[74]. The vast majority of these households are headed by, or include, women. Since 1 April 2004 it has been illegal for local authorities to house families with children and pregnant women in bed and breakfast accommodation for more than six weeks, which has put increased pressure on the housing system.

Ultimately, this will only be solved with the increased provision of suitable and affordable family homes. Local planning authorities could provide specialised family support centres as specialist alternative accommodation to meet emergency needs.

SPG Implementation Point 4.6b: Accommodation for crisis centres
Where strategic and local needs dictate, boroughs are encouraged to consider the provision of crisis centres for female victims of domestic violence, rape and abuse.

Access to employment and training
Women in London face a wider gap in comparison with men's pay and earning potential. In addition, part-time work which many women, and especially mothers choose, is more limited in earning and career progression potential. Higher living costs in London, particularly for housing and childcare, make it more difficult for women to make ends meet if they are not well paid. Lower earnings, interrupted employment patterns and time spent caring for others all mean a greater likelihood of having to live on a low income in retirement.

A wide range of factors can influence pay. These include education, work experience, having children, ethnicity, part-time employment, industry and occupation. A GLA Economics study, Women in London's Economy found that while the different individual and job characteristics between men and women contributed to 72 per cent of the gender pay gap in both London and the UK, 28 per cent of this pay gap is directly attributable to the unequal treatment of women[75]. Ensuring that barriers to employment are removed and local employment opportunities are provided to match local skills. Or, where they do not, ensuring the provision of training facilities to address this gap, are some of the ways in which planning can be used to ensure that women are in a better position to tackle discriminatory practices.

> **SPG Implementation Point: 4.6c Removing barriers to local skills training**
> The LDA are the main delivery agency for the Mayor's Childcare Strategy and will produce further guidance for boroughs on the development of Children's Centres that combine childcare support
> for both child and mother whilst providing training opportunities for women wishing to re-enter the workforce.
> http://www.surestart.gov.uk/surestartservices/childrenscentres/

> **Please also refer to SPG Implementation Points 3l, 3m, 3n, 3o and 3p in Section 3.7.**

Access to affordable childcare

The high cost of childcare in London is one of the major barriers to women's employment. The Mayor's Childcare Strategy is designed to improve the availability and affordability of childcare in London. The Mayor has continued to make funding for childcare available through the London Development Agency (LDA). Following gap funding for neighbourhood nurseries, providing over 1,100 places, the LDA has devoted £22 million to a joint Childcare Affordability Fund with the Department for Education and Science (DfES). Between 2005 and 2008 this fund will provide affordable childcare for around 10,000 lower income families across London.

The lack of facilities and support for carers of adults is another barrier to employment and training that needs further consideration in terms of providing facilities.

> **SPG Implementation Point 4.6d:**
> **Assessing childcare provision and need**
> Boroughs are encouraged to make detailed assessments of provision for childcare and draw up proposals to address any shortfalls. To address the shortage of childcare facilities in London, the Mayor will and boroughs should seek to ensure that proposals for housing and employment facilities provide suitable childcare for those in need of it. The Mayor will seek to ensure commercial facilities and housing developments should provide day care places if the developments would lead to extra need. This could involve contribution towards the cost of existing places that are currently priced out of reach of most families or through block funding a number of places that are made available to the local community. Alternatively land/premises could be provided or reserved for community organisation use.

Access to social and community facilities

Women have complicated lives and often multi-task, carrying out a variety of chores throughout the day and access to good local services is vital to them. This might include healthcare, education facilities (for themselves and/or children), leisure, education and cultural services.

Women are also highly represented as users of and volunteers at community and voluntary facilities. These provide small-scale services that are important to them – such as play groups, hobby and support groups and exercise classes. The need for affordable accommodation for these facilities should be recognised and provided for in development plans and in regeneration schemes, especially where no such facilities are currently provided.

Please also refer to SPG Implementation Points 3q, 3r, 3s, and 3t in Section 3.8.

Access to public transport, walking and cycling

Women require convenient, affordable and safe public transport as well as safe and accessible walking and cycling routes to cover most local journeys from the home.

Local bus routes are particularly important for London's women – both for those who live in the centre and the suburbs. Increasing provision of these services is vital because of the kind of trips that women are more likely to make – combining trips for work, local shopping, childcare as well as social and leisure.

Women with children are also likely to be concerned about the safety of local roads and support the creation of home zones where relevant.

Please also refer to SPG Implementation Point 3v, in Section 3.10.

Personal safety in the public realm and on public transport

Concern about personal safety can limit women's opportunities to take part in all aspects of London life, and women are less likely to feel safe than men. Ensuring that safety issues are considered in the design of the public realm and at transport interchanges will have benefits for all, but will improve women's confidence.

Please also refer to SPG Implementation Points 3d, 3e, 3f, 3g, 3h and 3i in Sections 3.2, 3.4 and 3.5.

D. Further Information

Women in London's Economy, GLA Economics, Mayor of London, February 2007 http://www.london.gov.uk/mayor/economic_unit/wile/index.jsp

Women in London, Mayor of London, 2007 http://www.london.gov.uk/capitalwoman/docs/women-in-london-2007.pdf

The London Childcare Strategy: Towards affordable good quality childcare for all, Mayor of London, 2003 http://www.london.gov.uk/mayor/strategies/childcare/index.jsp

The Gender Mainstreaming Toolkit, RTPI (2004)
http://www.rtpi.org.uk/resources/panels/equal-w/gender.pdf

The Women and Equality Unit
http://www.womenandequalityunit.gov.uk/

4.7   Black, Asian and Minority Ethnic People
Introduction
Nearly a third of all Londoners are from black, Asian and minority ethnic groups (BAME)[76]. While they share many of the generic needs of all Londoners, or have additional needs concomitant with their age, disability, gender or sexuality, at the same time, many black and minority ethnic groups have distinct spatial needs. These needs must be taken in to account in producing LDFs to ensure that development plans reflect the diversity of local populations.

A. BAME communities in London – the facts
· According to the 2001 Census, black and minority ethnic groups made up nearly 29 per cent of London's population. The largest groupings are people from the Indian sub-continent, black Caribbeans and black Africans[77].
· By 2016 there will be twice as many BAME Londoners over the age of 65 compared with 2001[78].
· Since 1997 homelessness among the African Caribbean population has risen at two and a half times the rate of the general population (89 per cent increase in homelessness among Black African Caribbean households compared to 34 per cent increase in homelessness among the general population)[79].
· BAME groups are disproportionately likely to experience poor housing; they are seven times more likely to live in overcrowded conditions than white households[80]. People of Bangladeshi origin are particularly likely

to experience overcrowding with over half of Bangladeshi children living in officially overcrowded conditions[81].

· BAME groups are two to three times more likely than white British people to end up homeless and three times more likely to be living in social housing. Twice as many BAME households live in conditions deemed officially unfit for human habitation, compared to white households[82].

· People from BAME communities are more likely to be poor and to be unemployed, regardless of their age, gender and qualifications[83].

· In terms of experiences of discrimination in employment, black Africans and Caribbeans had the highest rates of job refusal and perceived unfair treatment at work (39 per cent being refused jobs and 21 per cent unfairly treated, compared with 20 per cent and 12 per cent among white people, and 31 per cent and 16 per cent among Asians)[84].

· Many ethnic minority groups continue to have higher unemployment rates, greater concentrations in skilled and semi-skilled work and lower hourly earnings than white people. These differentials cannot be explained by the age, education or foreign birth of ethnic minority groups[85].

· The Latin American community in London has grown over recent years and now represents a minority as does the Eastern European economic migrant community.

B. BAME People – the key spatial issues
The following section sets out the spatial implications of disadvantage and social exclusion in London's BAME people.

1 **Discrimination** in London's labour market is a recurrent problem for many black and minority ethnic groups, particularly young black men and constrains **access to employment opportunities**.

2 **Worklessness** is a key factor in the poverty experienced by some BAME communities. In London, the spatial location of workless households relates closely to those wards that are classified as most deprived.

3 Living in these deprived areas often means that these groups are restricted in the level of **access to essential social facilities** and the transport provision to reach them.

4 The **cost of housing** in London often prohibits families from being able to access the type or size of accommodation required. The **larger family size** in some BAME communities mean that **overcrowding and poor housing conditions** can be a particular problem.

5 Many black and minority ethnic groups are prevented from enjoying life to the full because of **fear of crime, racial abuse and**

discrimination.They can often feel victimised in the public realm and uncomfortable accessing open space.

C. What can planning do?

The analysis above shows that at a strategic level there are five key spatial issues that are of particular importance to meeting the needs of London's BAME communities. These issues will need careful consideration in the preparation of DPDs and are now set out below in greater detail. Where planning can make a difference to meeting the needs of this equality group, implementation points are set out alongside the main issues.

Access to employment and training

The levels of discrimination that are inherent within the labour market in London prevent some people from participating fully in London's economy, with poverty and social exclusion as a result. The planning process should seek to address this shortage of opportunities from an employment perspective by ensuring that developments in areas where there are high levels of worklessness are mixed-use and provide relevant employment opportunities such as increased provision of business start up units with skills training offered where necessary.

SPG Implementation Point 4.7a: Supporting SMEs
The LDA's Economic Development strategy provides guidance on and support for non-spatial and non-land use initiatives, especially the roles and needs of economic clusters, small and medium sized enterprises, black and other ethnic minority entrepreneurs and the voluntary and community sectors. The Mayor supports the use of the planning system to secure suitable and affordable premises for SMEs and encourages the boroughs to do likewise.

Please also refer to SPG Implementation Point 3l, 3m, 3n, 3o, and 3p in Section 3.7.

The Mayor is working actively with the MPS to address some of these issues, particularly in respect of the recruitment and retention of black police officers. The Mayor recommends that boroughs should seek to extend this good practice to all areas of employment and training opportunities.

Access to appropriate housing

People from BAME communities are also more likely that than the population as a whole to live in poor quality and overcrowded housing. The cost of housing in London often prohibits families from being able to access the type or size of accommodation required; given the larger size

of families in some BAME communities, overcrowding and poor housing conditions can be a particular problem.

Boroughs are encouraged to consider developing a borough specific BAME housing strategy in those areas with a large ethnic/diverse population. The London borough of Harrow has a BME housing strategy in place (supplemented by action plans) that considers the characteristics of the populations, assesses their housing needs and evaluates ways in which this can be implemented.

Please also refer to SPG Implementation Point 3k, in Section 3.6.

Access to social facilities

When seeking access to social facilities many BAME people experience problems related to a lack of cultural sensitivity, overt racism and language barriers in the provision of social facilities. Public health bodies are required under the Race Relations [Amendment] Act 2000 to eradicate discrimination and promote racial equality. This provides an opportunity for public service providers to properly investigate the needs of local communities and work with them to plan, design, deliver and monitor service provision.

The GLA supports health organisations in developing and implementing schemes and initiatives to address the diverse needs of black Londoners [e.g. development of ethnic monitoring systems, consultation practice, mainstreaming, etc.] There are significant problems experienced by older people within black and minority ethnic communities. Older people from these communities are often extremely isolated, marginalised; have difficulties accessing health and social care and experience significant levels of racial harassment. Local community groups can enable individuals to access mainstream services and support and achieve independence.

Please also refer to SPG Implementation Points 3q, 3r, 3s, and 3t in Section 3.8.

Encouraging multiculturalism

Encouraging multiculturalism in the provision of local services is one way that planning can contribute to meeting the social facility needs of BAME. Areas such as Southall and Chinatown should be supported and enhanced in line with market demands for the specific services they provide for their constituent ethnic communities in London, the educational role they play in providing different cultural experiences and the links they provide.

Please also refer to SPG Implementation Points 3b and 3c in Section 3.2 and 3s in Section 3.8.

Crime and safety

Many black and minority ethnic people are prevented from enjoying life to the full because of fear of crime and racial abuse. Hate crime is a real issue and there were more than 20,000 race-related incidents and 18,000 racial offences in London in 2001[86]. Discrimination in the workplace must be eradicated in a meaningful way, particularly given the projected growth in the population of black and minority ethnic communities in London, which will see 80 per cent of the total increase in working age population coming from BAME communities[87].

Establishing systematic processes to monitor racial harassment cases, more investment and support for community based organisations supporting victims of harassment can be helpful in understanding the spatial context and identifying issues that could be dealt with through the planning process.

Please also refer to SPG Implementation Points 3f in Section 3.4 and 3h and 3i in Section 3.5.

Deprivation and regeneration

There is an ethnic dimension to poverty in London, and this is reflected in the high concentrations of BAME communities within areas of deprivation. It is important to tackle the disadvantage experienced by these groups and regeneration that provides specific estate renewal programmes or more general improvements housing, local environmental quality, transport or employment opportunities can all play a part.

Facilitating choice in housing provision will allow communities to remain in an area and are able to benefit in the longer term from improvements. Research for the Mayor has demonstrated the importance of communicating with and involving local people from the start of any major regeneration projects. This is particularly important in helping understand how regeneration can benefit and be tailored to the needs of BAME communities[88].

Please also refer to SPG Implementation Points 3a, 3b, 3c, 3d and 3e in Sections 3.1 and 3.2.

D. Further Information

Ready for Business: The contribution of black businesses to London's economy – February 2005
http://www.london.gov.uk/mayor/economic_unit/docs/ready_for_business.pdf

The contribution of Asian-owned businesses to London's economy, June 2005 http://www.london.gov.uk/mayor/economic_unit/docs/asian_businesses.pdf

The Ethnic Minority Foundation (EMF) is a charity committed to extending opportunities to people from the most disadvantaged communities in the UK. http://www.ethnicminorityfund.org.uk/

The Commission for Racial Equality is a publicly funded, non-governmental body, which tackles racial discrimination and promotes racial equality. http://www.cre.gov.uk/index.html

Black Information Link (Blink) is an independent, interactive community site for justice, equality, anti-racism and social inclusion. http://www.blink.org.uk/pubs.asp

The Chinese in Britain Forum works to promote equal access to public resources and services for Chinese people living in the UK. http://www.cibf.co.uk/english/index.htm

4.8   Immigrants, Refugees and Asylum seekers
Introduction

London is a city that has a long tradition of receiving immigrants. Today as throughout its history, they include not only people looking for work but also those seeking asylum from persecution, those wishing to be re-united with their families or to ensure better educational opportunities for their children. Neither the Home Office dispersal system operating since 2000, nor the recent fall in the number of UK asylum applications, is likely to diminish the importance of refugees in London's development or London's central role in receiving and integrating refugees who reach the UK.

Considering that many refugees and asylum seekers are some of the most vulnerable and socially excluded people in our city, it is important that their needs are taken into account in a spatial planning context.

A. Refugee and asylums seekers in London – the facts
· Over the six years from 1998-2004 London received around two-thirds of the UK's net inflow of international migrants , at the rate of around 100,000 per annum - equivalent to a 1.4 per cent annual increment on the city's current population of 7.4 million.
· Building on large-scale immigration to London in earlier decades, the inflow of recent years means that by 2002/03 Londoners born outside the UK totalled two million people or 29 per cent of its total resident population - and 35 per cent of the working-age population.

- The 2001 Census showed that, of residents moving to London from overseas in the previous year, 55 per cent were aged 15-29 with a further 11 per cent aged under-15.

- Arrival of migrants from abroad is a key element in the population growth projected by this plan, and to the dynamic effects that flow from it.

- London's high average household size, relative to the rest of the UK, probably in part reflects patterns of household formation among many of the city's migrants - whether those with families, or single adults choosing to share dwellings for cultural or financial reasons.

- London today, on available evidence, is home to most of the UK's refugees and asylum seekers and is likely to remain so for the foreseeable future. Possible numbers of refugees and asylum seekers who claimed UK asylum during 1991 – 2005 (cumulative) and who were living in London in 2005, including dependents, totals up to 0.5million people or six to seven per cent of the city's total population[89].

- Refugees and asylum seekers make up a substantial part of the city's ethnic minority population[90].

- Working migrants from Poland, India and China make up the largest groups of economic migrants in London, contributing to the city's economy[91].

B. The key spatial issues
The barriers facing refugees and asylum seekers coincide with those faced by non-refugee black, Asian and minority ethnic Londoners, but they also have distinct needs that present specific challenges.

1 The need for **access to both temporary and permanent affordable accommodation**, in both the social and private rented sector.

2 Many have high health needs and report difficulty in accessing **social facilities** such as basic primary health and social care. Again, further research is needed to help identify these issues.

3 **Travel problems** (which can range from lack of money to pay for public transport to access to information as to the whereabouts of information centres) again illustrate the way access to employment, especially for asylum seekers, may be blocked by restrictions on working that causes poverty.

4 Women refugees are likely to face a **specific extra set of pressures and constraints**, due to the conditions of escape to the UK and dependence on male principal applicants. Many women face arrival risks, arising from: **temporary accommodation; problems getting access to health and social care**, especially in pregnancy and for mothers with young children; problems in getting school places;

overcrowded, insecure housing; and (often) isolation from family or community who might help with childcare and consequent extra barriers to entering the labour market.

5   Sustained net immigration from abroad plays a key part in maintaining London's young age structure and hence its high level of fertility.

C. What can planning do?
The analysis above shows that at a strategic level there are five key spatial issues that are of particular importance to meeting the needs of refugees and asylum seekers. These issues will need careful consideration in the preparation of DPDs and are set out below in greater detail. Where planning can make a difference to meeting the needs of this equality group, implementation points are set out alongside the main issues.

The Mayor has established a Board for Refugee Integration in London (BRIL) to establish how he will carry out his strategic leadership of refugee integration work. Many of the issues in this chapter are dealt with in further detail by the Mayor's Refugee Integration Strategy for London, which contains chapters on housing, employment, training and enterprise, health, community safety, refugee children and young people and community development, participation and funding (see reference in Section D: Further information).

Immigration
Many areas in London are experiencing population change due to migration. Often these areas have higher fertility rates than the wider community Both the wide range of planning needs associated with children and young adults, and the significant potential they offer the city in cultural and economic terms will need to be a key consideration when planning in areas undergoing these population changes.

SPG Implementation Point 4.8a:
Monitoring immigration impacts
Boroughs are encouraged to monitor the immigration flows and assess needs relating to the composition of incoming groups.

Access to temporary and permanent accommodation
Refugees and asylum seekers have differing housing needs and a range of dwelling sizes and types need to be provided in both the private and social sector. Many refugees and asylum seekers face challenges relating to low or lack of income; lack of capital for a deposit; few household possessions and high forced mobility which makes it difficult to establish a 'local connection'. Some kinds of temporary accommodation currently used by authorities to house refugees and asylum seekers are

inappropriate – especially for women and children and young people, many of whom are traumatised by their experiences – and can place them at unacceptable levels of risk on arrival.

In the longer-term, issues of international migration may impact on demand for housing in London. With many immigrants choosing to share dwellings for cultural or financial reasons, there may be a greater need for larger accommodation. Current immigration from abroad from poorer countries (making up the majority of London's foreign-born population) is also likely to affect housing tenure by sustaining demand for cheaper, private sector rented accommodation in the capital.

On 24 July 2000 responsibility for accommodating new asylum seekers passed from London boroughs to the National Asylum Support Service. However accommodation needs of this large and vulnerable element of London's population remains an important factor in planning for the capital's housing in both the short and long term. Boroughs retain the duties to offer temporary accommodation to a wide variety of people.

SPG Implementation Point 4.8b: Access to temporary and permanent accommodation
Refugee and asylum seekers have different needs and boroughs must make this distinction, for example in the type and sizing of housing required. An assessment of need may be the most suitable way to determine what types of dwellings are required. Advice should be sought from organisations that support asylum seekers and refugees such as the Refugee Council or the Albert Kennedy Trust.

Access to employment and training opportunities
The most recent large-scale study of refugee employment was the Refugee Skillsnet survey based on interviews with 236 refugees and asylum seekers in London (London Research Centre 1999). This focused on people with high-level qualifications or skills from their home countries. They had trained for example in medicine, engineering, computing, teaching, business and journalism; there were also secretaries, mechanics, electricians and welders.

- The great majority of refugees surveyed had worked in their countries of origin, usually for several years and often in positions of responsibility.
- Eighty five per cent spoke good English.
- Most people spoke three or more languages and some as many as seven or eight.

- Most also had a wide range of leisure and home skills, such as dressmaking, song writing, radio production, furniture design, theatre, counselling, fundraising and advocacy[92].

However, aside from their qualifications not being recognised, many refugees and asylum seekers are prevented from accessing employment and training facilities due to their residential and benefit-claimant status. Refugee and asylum seekers have different barriers to overcome when accessing employment. Advice should be sought from organisations that support asylum seekers and refugees such as the Refugee Council. The wealth of expertise and skills refugees and asylum seekers have should not be wasted due to bureaucratic processes. London has a skills shortage and improved access to information on routes into employment could prevent people, who are keen to work, from remaining unemployed. These issues will be explored in more detail in the Mayor's Learning and Skills Strategy.

Please also refer to SPG Implementation Points 3l, 3m, 3n, 3o, and 3p in Section 3.6.

Access to support/social services
With its long history of receiving refugees and asylum seekers, London has a wide range of services seeking to meet their specific needs. This includes the provision of specialised support services, access to information and advice about the asylum process and provision of cultural facilities to smooth the process of integration. Advice on how to get to and apply for housing, job opportunities and healthcare facilities is essential and will play a role in providing equitable access to social services and support for refugees or asylum seekers.

However, provision is often inadequate, uneven and poorly coordinated, with older refugees and asylum seekers having little visibility within the system due to language barriers. Local authorities should co-ordinate with central Government to ensure that refugees and asylum seekers are able to access support services within the local area. Given the limited income of refugees and asylum seekers, it will be important to ensure that they are able to access public transport and orientate themselves within their local area.

SPG Implementation Point 4.8d: Access to support and information
Boroughs are asked to work with the new Board for Refugee Integration in looking to provide appropriate information for newly arrived asylum seekers and ongoing advice for refugees. Boroughs are advised to identify any need for new information centres and seek to provide them through new development.

SPG Implementation Point 4.8e: Supporting cultural facilities
Where a high proportion of a particular group of refugees and/or asylum seekers reside in one borough, the borough is advised to investigate and to encourage the provision of appropriate cultural facilities.

Please also refer to SPG Implementation Points 3b, 3c, 3d in Section 3.2 and 3s and 3t, in Section 3.8.

D. Further Information
London Enriched: The Mayor's Draft Strategy for Refugee Integration in London, July 2007 http://www.london.gov.uk/mayor/equalities/ immigration/docs/ref-int-strategy-summ.pdf

London Enriched: The Mayor's Draft Strategy for Refugee Integration in London. Reference document supporting evidence for the strategy, July 2007 http://www.london.gov.uk/mayor/equalities/immigration/ docs/ref-int-strategy-reference.pdf

The Board for Refugee Integration in London (BRIL) http://www.london. gov.uk/mayor/equalities/immigration/bril/concept.jsp

Estimating London's new migrant population: Stage I – review of methodology September 2006 http://www.london.gov.uk/mayor/ refugees/docs/nm-pop.pdf

Refugees and asylum seekers in London: a GLA perspective, September 2001.

Missed Opportunities: A skills audit of refugee women in London from teaching, nursing and medical professions, December 2002 http://www.london.gov.uk/mayor/refugees/docs/skills_rpt.pdf

Destitution by Design – Withdrawal of support from in-country asylum applicants: An impact assessment for London, February 2004 http:// www.london.gov.uk/mayor/refugees/docs/destitution_by_design.pdf

Offering more than they borrow: Refugee children in London, March 2004
http://www.london.gov.uk/mayor/refugees/docs/refugee_
children_report.pdf

The Refugee Council is the largest organisation in the UK working with
asylum seekers and refugees. http://www.refugeecouncil.org.uk/

Asylum Aid is a charity working to end discrimination and help asylum
seekers to get integrated in local communities in the UK.
http://www.asylumaid.org.uk/AA pages/campaigns.htm

Amnesty International campaigns for a fair and humane asylum system in
the UK. Join Amnesty. http://www.amnesty.org/

4.9 Gypsies and Travellers
Introduction
Gypsies and Travellers are some of the most socially excluded and
discriminated communities in the country, and very under-represented at
all political levels. In general there is a lack of interest and information
about the numbers, way of life and needs of Gypsies and Travellers that
hinders the ability of public services to respond to their needs. A shortage
of appropriate accommodation sites for Gypsies and Travellers also inhibits
their ability to access key services.

The recent reduction in the number of available sites – the result of
legislative change – has led some Gypsies and Travellers to use
unauthorised encampments. This in turn, has resulted in a policy emphasis
on crime/ disorder/ environmental damage relating to this group rather
than their needs/rights, and in many cases this has exacerbated already
fragile relations with local residents.

London Plan Policy 3A.11 London's travellers and gypsies
Boroughs should, in coordination with neighbouring boroughs and
districts, assess the accommodation needs of Gypsies and Travellers and
review the pitch capacity of each borough. UDP policies should:

· protect existing sites
· set out criteria for identifying the suitability of new sites
· identify them where shortfalls occur.

A. Gypsies and Travellers – the facts[93]

- Gypsies and Travellers are recognised ethnic groups under the Race Relations Act (1976), identified as having a shared culture, language and beliefs.

- In the UK 72 per cent or 10,836 Gypsies and Travellers are on authorised sites (5,946 on local authority sites and 4,890 authorised private sites).

- However, 28 per cent or 4,232 are on unauthorised developments or encampments – 12 per cent or 1,855 on unauthorised developments (where Gypsies and Travellers own the land but do not have planning permission) and 16 per cent or 2,377 on unauthorised encampments (where Gypsies and Travellers do not own the land and planning consent has not been given for use as a site).

- Because of pressure on land and a lack of suitable permanent sites, there is a higher than average additional proportion of housed Gypsies and Travellers in London.

- Since 1996 the total number of traveller caravans has remained fairly constant, but the number of caravans on unauthorised sites has increased, while those on unauthorised sites has decreased.

- Gypsies and Travellers are more prone to ill health and experience significantly higher levels of prenatal mortality, stillbirths and infant mortality than the national average.

- It is estimated that, on average, Gypsy and Traveller women live 12 years less than women in the general population and Gypsy and Traveller men ten years less than men in the general population.

- Gypsy and Traveller pupils in England are the group most at risk of failure in the education system

B. Gypsies and Travellers – the key spatial issues

The following section sets out the spatial implications of disadvantage and social exclusion in London's Gypsies and Travellers.

1 London has a lack of **permanent sites** to accommodate the Gypsy and Traveller population, with currently no transit sites at all. There is particularly high pressure on sites in London due to the **high value of land.**

2 Sites are often located in **poor environments**, on polluted and hazardous areas, which are unsafe and can cause health issues.

3 Understanding the lifestyles of Gypsies and Travellers is key to reducing the **social exclusion** they experience in **accessing social facilities** such as health, education and employment. But, there is much ignorance about the way of life, needs, even the numbers, of Gypsies and Travellers and this makes adequate social provision difficult.

4   It is difficult for Gypsies and Travellers to **access mainstream employment**, not only due to their transitory lifestyle, but also because of **poor educational attainment** and **discrimination.**

5   Key issues affecting Gypsy and Traveller children are those associated more generally with child poverty and include a lack of site provision, a lack of basic amenities, and a range of **inequalities in health and in education and within the youth justice system**[94].

6   The **lack of accurate information** about Gypsies and Travellers has been worsened as the 2001 Census did not include Romany Gypsies or Irish Travellers as named ethnic groups.

C. What can planning do?

The analysis above shows that at a strategic level there are six key spatial issues that are of particular importance in meeting the needs of Gypsies and Travellers. These issues will need careful consideration in the preparation of DPDs and are set out below in greater detail. Where planning can make a difference to meeting the needs of this equality group, implementation points are set out alongside the main issues.

Access to housing – Provision of transit sites

Local authorities have a duty under the Race Relations Act (as amended 2002) to ensure that all ethnic minorities including Gypsies and Travellers have equal access to services, are adequately consulted about policies that affect them and that Race Equality Impact Assessments are carried out to determine the impact of policies on ethnic minorities and that good community relations are maintained. However, many local authorities have challenged the targets set by planning circular 1/2006 or have caved in to pressure from the settled community and cancelled or deferred plans for increasing site provision or the location of new sites in marginal areas.

Although local authorities used to have a legal duty to provide sites for Gypsies and Travellers, this obligation was removed in 1994 following the Criminal Justice and Public Order Act. As a result, and along with a change in the use of land and more land being identified for housing, there are now too few sites to accommodate all Gypsies and Travellers.

Gypsies and Travellers experience difficulties in gaining planning permission for caravan use on sites: 90 per cent of all Gypsy and Traveller planning permission applications are initially rejected compared to 20 per cent overall. As a result, some Gypsies and Travellers, certain that their applications will be initially turned down, set up sites before obtaining or even applying for planning permission[95].

There is a clear need for the demand for permanent and transit site needs to be assessed in boroughs hosting Gypsy and Traveller communities and for sites to be made available. Although caravan counts have been conducted across local authorities, there has been inconsistency and little monitoring of accuracy. This has meant an underestimation of the numbers of caravans in use, which do not include housed Gypsies and Travellers who may wish to live on caravan sites. However, it is important that boroughs begin to act on the needs identified without delay as years of neglect and three years on from the Housing Act 2004, not one site has been built to remedy the deficit. Powers of intervention do exist where local authorities fail to identify locations for sites following the completion of the Gypsy and Traveller Accommodation Needs Assessment.

The Mayor recognises the needs of Gypsies and Travellers' nomadic lifestyles and the need to protect existing sites and review pitches and is co-ordinating piece of research on behalf on London Councils producing more accurate figures. Boroughs should in accordance with Circular 01/2006 Planning for Gypsy and Traveller sites have regard to the accommodation needs of Gypsies and Travellers and formulate policies to assess the suitability of new sites.

SPG Implementation Point 4.9a: Investigating the need for transit sites
Before allocating sites for use by Gypsies and Travellers boroughs are asked to assess the most appropriate types of sites to provide. Regional research currently being carried out will provide useful information on current site provision and help boroughs to identify where deficiencies arise

Site quality and management
Transit and permanent sites need to be provided with adequate waste, sanitation and management arrangements, within accessible distance of social facilities. There is a similar need for good design, variety and choice on Gypsy and Traveller sites as in other social housing. As yet, the Communities and Local Government guidance to be issued as 'Decent Homes' standard, does not apply to Travellers' sites – and is yet more evidence of discrimination against Travellers in their accommodation and at a legislative level. The results of a lack of enforceable standards can be seen in levels of disrepair and poor maintenance in sites all across London.

In addition, many of the sites are either not managed at all or are managed by inappropriate departments, such as pest control, street cleaning or noise nuisance. Poor management leads to a decline in quality, causing distress for site residents and poor relations with the surrounding

communities. It should be standard practise that Travellers' sites are managed by the same agencies as other social housing in the area.

SPG Implementation Point 4.9b: Access to site provision and effective site management
When allocating sites for Gypsies and Travellers boroughs are asked to provide effective and sustained site management to maintain site quality

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The Mayor in partnership with London boroughs has commissioned a comprehensive London wide study of Gypsy and Traveller accommodation needs. This will be completed by June 2007 and will form the evidence base for borough targets. In the interim, table 3A.3 in the draft Further Alterations to the London Plan (2006) sets out information by borough from the most recent DCLG caravan count, in relation to authorised provision and unauthorised provision.

Access to education and training facilities
Gypsy and Traveller children, particularly those of secondary age, have much lower levels of school attendance than pupils from other groups. By Key Stage 3, it is estimated that only 15-20 per cent of Traveller pupils are registered or regularly attend school[96]. In 2003, 23 per cent of Roma Gypsy pupils and 42 per cent of Traveller pupils in England obtained five or more A*-C GCSEs, compared with an overall average of 51 per cent. Twenty two per cent of Roma Gypsy pupils and 17 per cent of Traveller pupils obtained no passes, compared with six per cent on average[97]. If planning is used to place sites within reach of education facilities this social exclusion of children within education may be reduced.

SPG Implementation Point 4.9c: Site requirements
Sites should be appropriate for residential occupation and have access to social facilities, including schools and healthcare. Where the use of a site as a Gypsy and Traveller site will also include non-residential uses, these uses should be compatible with neighbouring land uses.

Access to health services
Gypsy and Traveller communities often experience lower levels of good health than the wider community and they experience considerable difficulties in registering for medical care due to their often being classed as a 'temporary patient'. This means that their medical files are not always kept on site that hinders diagnosis and monitoring. By locating permanent sites within easy reach of health services, local health services will be easier to access, especially for older age groups who have greater health and social care needs. However, service providers will also need to be aware and able to respond to the specific needs of these communities.

> **Please also refer to SPG Implementation Points 3b, 3c, 3d and 3e, in Section 3.2 and 3s, 3t in Section 3.8.**

D. Further Information

ODPM circular 01/06 Planning for gypsy and traveller caravan sites
http://www.communities.gov.uk/pub/389/Circular0106ODPM
PlanningforGypsyandTravellerCaravanSitesPDF253Kb_id1163389.pdf

Moving Forward the provision of accommodation for Travellers and Gypsies (2004) Heaven Crawley

Common Ground: Equality, good race relations and sites for Gypsies and Irish Travellers 2006 http://www.cre.gov.uk/about/gtinquiry.html

Partnership and Good Community Relations 2006 (The Safer Communities Initiative's Work with Gypsies and Travellers
http://www.cre.gov.uk/gdpract/sci/partnership.html

4.10 Lesbians, Gay Men, Bisexual and Trans People
Introduction

London's lesbians, gay men, bisexual and trans people (LGBT) continue to face prejudice and discrimination and are still denied many of their basic human rights. LGBT people experience discrimination based on society's attitude to homosexuality and trans people experience gender identity discrimination.

A. LGBT communities in London – the facts

- London has the largest population of lesbians, gay men, bisexual and trans people in the country.
- Some estimates state that the LGBT community makes up ten per cent of the capital's population and that almost half experience discrimination at work because of their sexuality or gender identity[98].
- Nearly half of the estimated three million gay men and lesbians in the UK do not reveal their identity to their colleagues and one in ten gay men and one in eight lesbians have been harassed at work because of their sexuality[99].
- But financial services recruiter Joslin Rowe has found that 8.2 per cent of respondents working in the City of London identified themselves as gay compared with 5.9 per cent two years ago.
- The Mayor is aware that reliable research and supporting data on the experiences and needs of the lesbian, gay, bisexual and trans communities is inadequate.

B. LGTB people - the key spatial issues

The following section sets out the spatial implications of disadvantage and social exclusion for London's LGBT people.

. Lesbians, gay men, bisexuals and trans people can face **hate crime and harassment** in the public realm. Issues of homophobia and transphobia are forms of a discrimination that can impact on the way that this group interacts with the spatial environment.

2 These issues are compounded further for lesbians, gay men, bisexual and trans people from other equality groups as they often experience **multiple discrimination.**

3 **A lack of awareness** of the way discrimination impacts on these communities, particularly with regard to **housing, employment, counselling, advice and health services** means that these groups are not currently well-planned for in spatial terms and can be reluctant to access services which they are entitled to for fear of discrimination or breach of confidentiality.

4 **Personal safety** in public spaces and on public transport is often an issue for LGBT people, particularly for those who are open about their sexuality.

5 Some parts of London have a particularly high concentration of **night time entertainment venues** that cater to LGBT people. In these areas, consideration should be given to how **social and recreational facilities** can be provided.

C. What can planning do?

The analysis above shows that at a strategic level there are five key spatial issues that are of particular importance to meeting the needs of LGBT people. These issues will need careful consideration in the preparation of DPDs and are set out below in greater detail. Where planning can make a difference to meeting the needs of this equality group, implementation points are set out alongside the main issues.

Researching the issues

Not enough research has been done on the issues that affect the LGBT community. If planning is to address the needs of these, detailed research and consultation will be needed.

SPG Implementation Point 4.10a: Further research and supporting data on the experiences and needs of LGBT communities
Boroughs are asked to identify areas where there are concentrations of LGBT communities where regeneration and development opportunities could contribute to the provision of relevant services and community safety support.

Opposing discrimination

The needs of LGBT people are not fully understood by service providers. Because of this, they are often exposed to discrimination and harassment in terms of accessing public services from healthcare to housing provision. LGBT communities experience discrimination and/or harassment in accessing employment opportunities. Provisions have been set in law to tackle this.

Please also refer to SPG Implementation Points 3h and 3i in Section 3.5.

The public realm

The public realm can be a place where lesbians, gay men, bisexuals and trans people can face hate crime and harassment. Issues of homophobia and transphobia are forms of discrimination that can impact on the way that this group uses the public realm. They can contribute to social exclusion by preventing these communities from taking part in everyday life. Planning can make a contribution to ensuring the personal safety of all people in the public realm by applying principles of inclusive design, and where necessary providing well-overlooked spaces and CCTV.

Please also refer to SPG Implementation Points 3c and 3d in Section 3.2 and 3g and 3h, in Section 3.5.

Area based facilities

In light of discrimination and fear of harassment, several areas in London have developed and been established over the years as safe and tolerant of other sexualities by the LGBT community. Well-known areas such as Old Compton Street in Soho and Vauxhall are complemented by more local areas of LGBT facilities, which are often signalled to the LGBT community by the use of a rainbow flag. Local authorities should be aware of this provision and ensure that where necessary, it is protected and that the surrounding areas are safe and accessible for all.

The night time economy has particular significance to some of London's diverse communities. Some members of lesbian, gay and bisexual and transgender communities in particular use the leisure economy as a visible element of their urban lives[100].

SPG Implementation Point 4.10b: Area based facilities
In areas where the local authority has identified an established LGBT community, boroughs are advised to encourage applications that expand cultural facilities for LGBT communities.

Please also refer to SPG Implementation Point 3c, 3d, 3e in Section 3.2 and 3h and 3i, in Section 3.5.

Access to housing
Some LGBT communities have different needs and boroughs should seek to address these distinctions, for example in the type and sizing of housing required. An assessment of need may be the most suitable way to determine what types of dwellings are required. Advice should be sought from organisations that support LGBT people such as Stonewall Housing or the Albert Kennedy Trust. Specialist accommodation may be considered for LGBT communities, especially people at risk of also being discriminated against due to age or ethnicity. Provision for sheltered accommodation and emergency hostels should be considered for the more vulnerable members of the LGBT community.

Please also refer to SPG Implementation Point 3j in Section 3.5.

D. Further Information
The Mayor supports Gay Data Resources, a service that provides a comprehensive directory of services that meet the needs of London's LGBT community. http://www.london.gaydata.co.uk

Stonewall Information Bank
Details about organisations tackling prejudice, discrimination and stigma against young and older people (Age), asylum seekers and refugees (International & Immigration), disabled people, women (Gender), trans people, people living with HIV and AIDS (Health), homeless people (Housing & Homelessness), people with mental health issues (Health), black and minority ethnic people (Race & Ethnicity), lesbians, gay men and bisexuals.http://www.stonewall.org.uk/information_bank/multiple_discrimination/default.asp

Stonewall Housing provides supported housing, advice and advocacy for the lesbian, gay, bisexual and transgender communities in London. http://www.stonewallhousing.org/

The Albert Kennedy Trust works to ensure that that lesbian and gay young people are able to live in accepting, supportive and caring homes. The trust provides homeless gay or lesbian teenagers (under 21) with lesbian or gay homes where they can live and rebuild their lives. http://www.akt.org.uk/.

Stormbreak Research Consultancy – The Lesbian and Gay Market http://www.stormbreak.co.uk/gayfr.html

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Annex 1: equality of opportunity for all Londoners: functional linkages

Equality of opportunity is a critical determinant of the quality of all our lives. A range of factors affect equalities issues and these are outlined in Table A3.1 of the London Plan, which is duplicated below. Factors such as access to leisure facilities, fresh food or decent living conditions can all lead to healthier, longer and more equal lives. Planning decisions have the potential to influence these factors and the following table sets out the areas where there is a link to improving equality of opportunity and health.

Health	Social and economic factors (for example: poverty, employment, social exclusion)	Environmental factors (for example: air quality, housing, water quality)	Lifestyle factors (for example: diet, physical activity)	Access to services (for example: education, NHS, leisure, transport)	Equalities
Policy 1.1 The Mayor's objectives	✓	✓	✓	✓	✓
Policy 2A.1 Sustainability criteria	✓	✓	✓	✓	✓
Policy 2A.2 Opportunity Areas	✓	✓		✓	✓
Policy 2A.3 Areas for Intensification	✓	✓		✓	✓
Policy 2A.4 Areas for Regeneration	✓	✓		✓	✓
Policy 2A.5 Town centres	✓	✓	✓	✓	✓
Policy 2A.6 Spatial strategy for suburbs	✓	✓	✓	✓	✓
Policy 3A.1 Increasing London's supply of housing	✓	✓			✓
Policy 3A.4 Housing choice	✓	✓			✓
Policy 3A.7 Affordable housing targets	✓	✓			✓
Policy 3A.9 Partnership approach and Sub-Regional Development Frameworks	✓	✓			✓
Policy 3A.10 Special needs and specialist housing	✓	✓			✓
Policy 3A.11 London's travellers and gypsies	✓			✓	✓
Policy 3A.13 Loss of hostels, staff accommodation and shared accommodation	✓			✓	✓
Policy 3A.14 Addressing the needs of London's diverse population	✓	✓	✓	✓	✓
Policy 3A.15 Protection and enhancement of social infrastructure and community facilities	✓	✓	✓	✓	✓
Policy 3A.16 The voluntary and community sector	✓	✓	✓	✓	✓

Health	Social and economic factors (for example: poverty, employment, social exclusion)	Environmental factors (for example: air quality, housing, water quality)	Lifestyle factors (for example: diet, physical activity)	Access to services (for example: education, NHS, leisure, transport)	Equalities
Policy 3A.17 Health objectives	✓	✓	✓	✓	✓
Policy 3A.18 Locations for health care			✓	✓	✓
Policy 3A.19 Medical excellence			✓	✓	
Policy 3A.20 Health impacts	✓	✓	✓	✓	✓
Policy 3A.23 Community strategies	✓		✓	✓	✓
Policy 3A.24 Meeting floor targets	✓		✓	✓	✓
Policy 3A.25 Social and economic impact assessments	✓				✓
Policy 3A.26 Supporting neighbourhood plans	✓			✓	✓
Policy 3B.1 Developing London's economy	✓				✓
Policy 3B.4 Mixed-use development	✓			✓	✓
Policy 3B.9 Creative industries	✓				✓
Policy 3B.10 Tourism industry	✓			✓	✓
Policy 3B.12 Improving the skills and employment opportunities for Londoners	✓			✓	✓
Policy 3C.1 Integrating transport and development	✓	✓		✓	✓
Policy 3C.2 Matching development to transport capacity	✓	✓			✓
Policy 3C.3 Sustainable transport in London	✓	✓			✓
Policy 3C.9 Increasing the capacity, quality and integration of public transport to meet London's needs	✓	✓	✓	✓	✓
Policy 3C.12 Improved Underground and DLR services				✓	✓
Policy 3C.13 Enhanced bus priority, tram and bus transit schemes				✓	✓
Policy 3C.16 Tackling congestion and reducing traffic		✓		✓	✓
Policy 3C.17 Allocation of street space		✓			✓
Policy 3C.18 Local area transport treatments				✓	✓
Policy 3C.19 Improving conditions for buses				✓	✓
Policy 3C.20 Improving conditions for walking	✓	✓	✓	✓	✓

Health

	Social and economic factors (for example: poverty, employment, social exclusion)	Environmental factors (for example: air quality, housing, water quality)	Lifestyle factors (for example: diet, physical activity)	Access to services (for example: education, NHS, leisure, transport)	Equalities
Policy 3C.21 Improving conditions for cycling			✓		✓
Policy 3C.22 Parking strategy		✓			✓
Policy 3D.1 Supporting town centres	✓	✓		✓	✓
Policy 3D.2 Town centre development	✓	✓		✓	✓
Policy 3D.3 Maintaining and improving retail facilities	✓			✓	✓
Policy 3D.4 Development and promotion of arts and culture			✓	✓	✓
Policy 3D.5 Sports facilities			✓	✓	✓
Policy 3D.6 Visitors' accommodation and facilities				✓	✓
Policy 3D.7 Realising the value of open space	✓				✓
Policy 3D.10 Open space provision in UDPs		✓	✓	✓	✓
Policy 3D.11 Open space strategies and audits		✓	✓	✓	✓
Policy 3D.15 Burial space				✓	✓
Policy 4A.6 Improving air quality		✓	✓		✓
Policy 4A.12 Water quality		✓			
Policy 4A.14 Reducing noise		✓			✓
Policy 4A.15 Climate change		✓			✓
Policy 4A.17 Dealing with hazardous substances		✓			✓
Policy 4B.1 Design principles for a compact city	✓	✓			✓
Policy 4B.4 Enhancing the quality of the public realm	✓	✓		✓	✓
Policy 4B.5 Creating an inclusive environment	✓		✓	✓	✓
Policy 4B.6 Sustainable design and construction	✓	✓	✓	✓	
Policy 4B.7 Respecting local context and communities	✓		✓	✓	✓
Policy 4B.10 London's built heritage		✓			✓
Policy 4B.11 Heritage conservation		✓			✓
Policy 4C.1 The strategic importance of the Blue Ribbon Network	✓	✓			✓
Policy 4C.16 Increasing sport and leisure use on the Blue Ribbon Network			✓	✓	✓

Health	Social and economic factors (for example: poverty, employment, social exclusion)	Environmental factors (for example: air quality, housing, water quality)	Lifestyle factors (for example: diet, physical activity)	Access to services (for example: education, NHS, leisure, transport)	Equalities
Policy 4C.17 Increasing access alongside and to the Blue Ribbon Network	✓	✓		✓	✓
Policy 4C.18 Supporting facilities and activities in the Blue Ribbon Network				✓	✓
Policy 5A.1 Sub-Regional Development Frameworks	✓	✓	✓	✓	✓
Policy 5B.1 The strategic priorities for Central London	✓	✓	✓	✓	✓
Policy 5B.2 Development in the Central Activities Zone	✓	✓		✓	✓
Policy 5B.3 Special Policy Areas	✓	✓		✓	✓
Policy 5C.1 The strategic priorities for East London	✓	✓	✓	✓	✓
Policy 5D.1 The strategic priorities for West London	✓	✓	✓	✓	✓
Policy 5E.1 The strategic priorities for North London	✓	✓	✓	✓	✓
Policy 5F.1 The strategic priorities for South London	✓	✓	✓	✓	✓
Policy 6A.1 The Mayor's own powers and resources	✓	✓			✓
Policy 6A.2 Working in partnership	✓	✓		✓	✓
Policy 6A.4 Priorities in planning obligations	✓	✓		✓	✓
Policy 6A.6 Generation and use of resources	✓	✓			✓
Policy 6A.7 Increasing the capacity of London	✓	✓			✓
Policy 6A.9 Working with stakeholders	✓	✓	✓	✓	✓
Policy 6A.10 Complementary strategies	✓	✓	✓	✓	✓
Policy 6B.1 Monitoring and review	✓	✓	✓	✓	✓
Policy 6B.2 Measuring progress	✓	✓	✓	✓	✓

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Annex 2: mainstreaming equality

In responding to its statutory duty to promote equality, the GLA has a range of Equalities initiatives. These include:

· Equalities schemes - which set out action plans to help meet equalities objectives – for each of the equality strands of Disability, Faith, Gender, Race and Sexual Orientation. An age equality scheme is also imminent.

· The Mayor has set up the London Equalities Commission to advocate, encourage, support and promote equalities in London.

· The Mayor's Annual Equalities Report, written to sit alongside the Annual Report sets out how the Mayor has championed equalities over the previous year.

· An Equalities Toolkit, which provides information and guidance to all GLA staff about how they can ensure that the work of the GLA challenges discrimination, promotes equality and is accessible to Londoners.

Boroughs have also adopted many of these initiatives, and this should be encouraged as part of the wider agenda of tackling social exclusion and disadvantage.

Signposts
The GLA Equalities Toolkit http://www.london.gov.uk/gla/publications/ equalities/equalities_toolkit.pdf

GLA Equalities Annual Report 2006/7 http://www.london.gov.uk/ mayor/annual_report/docs/equals_rpt_2007.pdf

GLA Equalities Annual Report 2005/6 http://www.london.gov.uk/ mayor/annual_report/docs/equals_rpt_2006.pdf

GLA Equality schemes:
http://www.london.gov.uk/mayor/equalities/ soes/index.jsp

http://www.london.gov.uk/gla/publications/equalities/race_ equality_scheme.pdf

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