

Equality Impact Assessment (EqIA) for London Plan Guidance

London Plan Guidance:	This EqIA covers four pieces of draft London Plan Guidance (LPG): <ul style="list-style-type: none">• Characterisation and growth strategy LPG• Optimising site capacity – a design-led approach LPG• Small site design codes LPG• Housing design standards LPG.
Teams involved:	London Plan team
Date:	October 2022

Who is the guidance aimed at and what are the key issues to be aware of?

1. Characterisation and growth strategy LPG

This relates to the following policies in the London Plan and is used for plan-making:

- Policy D1: London's form, character and capacity for growth
- Policy D3: Optimising site capacity through the design-led approach
- Policy D9: Tall buildings
- Policy HC1: Heritage conservation and growth
- Policy SD9 (Part B): Town centres – Local partnerships and implementation.

It sets out a three-stage process to survey and analyse the characteristics of areas; and uses this to identify the characters of different areas and define tall buildings. This is then used to support growth strategies that take account of areas' capacity for change and for growth, including areas where tall buildings might be appropriate and the heights in these locations.

2. Optimising site capacity: a design-led approach LPG

This relates to the following policies in the London Plan and is used for plan-making and directly informing planning applications:

- Policy D1: London's form, character and capacity for growth
- Policy D3: Optimising site capacity through the design-led approach
- Policy D4: Delivering good design.

It sets out a five-stage process for implementing the design-led approach to plan-making and the site assessments that inform specific planning applications.

3. Small site and design codes LPG

This relates to London Plan Policy H2: Small sites, parts B2 to B4, setting out a process to analyse the opportunities for small site development; and to prepare and implement design codes. It will be used for plan-making and directly informing planning applications. It covers relevant aspects of the National Model Design Code published in 2021 by national government.

4. Housing design standards LPG

This relates to London Plan Policy D6: Housing quality and standards, and provides a checklist of London Plan policy requirements for new-build, change of use and housing conversions in one place. It also has appropriate cross-references back to the relevant policy in the London Plan and guidance about the type of development to which different standards apply. The new guidance will be of interest to architects, designers, planners, developers, boroughs, neighbourhood planning groups, community groups and others.

Which of the Public Sector Equality Duty (PSED) aims are relevant to the guidance and the impacts identified?

The Public Sector Equality Duty (PSED) set out at Section 149 of the Equality Act 2010 requires the Council, when exercising its functions, to have 'due regard' to the need to:

1. eliminate discrimination, harassment and victimisation and other conduct prohibited under the Act;
2. advance equality of opportunity between people who share a protected characteristic and those who do not, having due regard, in particular, to the need to:
 - a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
 - b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
 - c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low;
3. foster good relations between people who share a protected characteristic and those who do not, having due regard, in particular, to the need to:
 - a) tackle prejudice, and
 - b) promote understanding.

Consider which aims are particularly relevant to the guidance.

The four LPGs will have broadly positive impacts for all protected characteristics, particularly in relation to aims 2a and 2b. In relation to public safety issues, the guidance may be able to have indirect positive impacts in relation to PSED aim 1.

Assessment

List aspects of the guidance that might affect particular groups

Guidance key aspects, chapter headings, theme etc	Particular group that could be affected
Characterisation and growth strategy LPG	<ul style="list-style-type: none"> • Children and young people • Older people • Disabled people (including those affected by chronic respiratory conditions) • Trans people • Pregnant women, and women who have recently given birth • Black/African/Caribbean/Black British Londoners, and Londoners of mixed, multiple or other ethnicities • Women • The LGBTQ+ community • People on low incomes.
Optimising site capacity – a designed approach LPG	<ul style="list-style-type: none"> • Older people • Children and young people • Disabled people • Pregnant women • Black Londoners • Women • People on low incomes.
Small site design codes LPG	<ul style="list-style-type: none"> • Religious and ethnic groups who live in multi-generational households. • People on low incomes. • Children and young people
Housing design standards LPG	<ul style="list-style-type: none"> • Older people • Children and young people • Disabled people • Trans people • Black/African/Caribbean/Black British Londoners, and Londoners of mixed, multiple or other ethnicities • Women and girls • People on low incomes.

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

Characterisation and growth strategy LPG equality impacts, mitigating actions and justification

This section sets out the positive and negative impacts of the implementation of this guidance, both known and potential, for specified groups.

The objectives from the London Plan Integrated Impact Assessment (IIA) and the EqIA guide questions are used where relevant to structure the answers.

For negative impacts, mitigating actions to minimise or eliminate negative impacts are identified, along with any action plan. If negative impacts cannot be mitigated, an objective justification is provided. For positive impacts, considerations is given to how these could be maximised.

The impacts are scored as follows:

- +2 Strong positive
- +1 Positive
- 0 Neutral
- - 1 Negative
- - 2 Strong negative

Age (consider particularly children, under-21s and over-65s)

Potential positive impacts and score

By setting out a clear and consistent process for how characterisation should be done, the LPG increases the likelihood that consideration of factors such as air quality, transport networks (particularly walking and cycling) and open space will inform how an area develops. Children and young people may benefit from improvements that would increase their levels of independent mobility (such as safer walking and cycling routes) and access to open spaces, which could help in tackling childhood obesity and support good mental and physical health. This aspect of the LPG may also benefit specific groups of children (those from a Black, Asian or minority ethnic background, and those on low incomes), where engagement with the natural environment tends to be lower.

Section 4.5 of the LPG specifically states:

“Visions should take into account the different needs of specific groups within the community and the potential future population, with a particular focus on creating inclusive and accessible neighbourhoods (as required by Policy D5 of the London Plan) and informed by equality impact assessments, as required under the Public Sector Equality Duty.”

Making this an explicit requirement of the visioning process aims to help to ensure that visions for growth areas result in places that are more inclusive for groups of people of specific ages, such as older Londoners, who tend to face more barriers in the public realm that can limit confidence and ability to access buildings, places and spaces. Nevertheless,

further explicit mention could be made that this should be informed by community engagement. As a result, additional text has been added to clarify this.

The LPG requires the development of area visions, informed by data including demographic and socio-economic analysis.

Requiring the identification of cultural, social or economic/commercial characteristics that are valued by the community may result in area visions that better reflect the needs of specific groups, including groups of people of specific ages.

The revised LPG requires the identification of cultural, social and economic/commercial characteristics that are valued by the community. This aims to better reflect the needs of specific groups. Impact score: **+1**

Relevant PSED aim(s)

- 2a
- 2b

Disability (consider different types of physical, learning or mental disabilities)

Potential positive impacts and score

By setting out a clear and consistent process for how characterisation should be done, the LPG increases the likelihood that consideration of factors such as air quality will inform how an area develops. Improving air quality is an important issue for disabled people affected by chronic respiratory conditions.

Section 4.5 of the LPG specifically states:

“Visions should take into account the different needs of specific groups within the community and the potential future population, with a particular focus on creating inclusive and accessible neighbourhoods (as required by Policy D5 of the London Plan) and informed by equality impact assessments, as required under the Public Sector Equality Duty.”

Making this an explicit requirement of the visioning process aims to help ensure that visions for growth areas result in places that are more inclusive for disabled people. Nevertheless, further explicit mention could be made of the fact that this should be informed by community engagement. As a result, additional text has been added to clarify this.

The LPG requires the development of area visions, informed by data including demographic and socio-economic analysis.

Requiring the identification of cultural, social or economic/commercial characteristics that are valued by the community aims to result in area visions that better reflect the needs of specific groups, including disabled people.

The revised LPG requires the identification of cultural, social and economic/commercial characteristics that are valued by the community. This aims to better reflect the needs of specific groups. Impact score: **+1**

Relevant PSED aim(s)

- 2a
- 2b

Gender reassignment

Requiring the identification of cultural, social or economic/commercial characteristics that are valued by the community aims to result in area visions that better reflect the needs of specific groups, including trans Londoners. Impact score: **+1**

Relevant PSED aim(s)

- 2b

Marriage and civil partnership

No anticipated impacts.

Pregnancy and maternity

Potential positive impacts and score

Requiring the identification of cultural, social or economic/commercial characteristics that are valued by the community aims to result in area visions that better reflect the needs of pregnant women, and women who have recently given birth. This is especially important given the traditional dominance of male-oriented patterns and types of development in city planning. Impact score: **+1**

Relevant PSED aim(s)

- 2b

Race or ethnicity (consider refugees, asylum seekers, migrants, Gypsies and Travellers)

Potential positive impacts and score

By setting out a clear and consistent process for how characterisation should be done, the LPG increases the likelihood that consideration of factors such as air quality will inform how an area develops. This aspect of the LPG may benefit Black/African/Caribbean/Black British Londoners, and Londoners of mixed, multiple or other ethnicities, who tend to be slightly more exposed to pollution than the rest of the population.

Requiring the identification of cultural, social or economic/commercial characteristics that are valued by the community aims to result in area visions that better reflect the needs of specific racial and ethnic groups. Impact score **+1**

Relevant PSED aim(s)

- 2b

Religion or belief

Requiring the identification of cultural, social or economic/commercial characteristics that are valued by the community aims to result in area visions that better reflect the needs of specific religious groups. Impact score **+1**

Relevant PSED aim(s)

- 2b

Sex

Potential positive impacts and score

Requiring the identification of cultural, social or economic/commercial characteristics that are valued by the community aims to result in area visions that better reflect the needs of women, given the traditional dominance of male-oriented patterns and types of development in city planning. Impact score **+1**

Relevant PSED aim(s)

- 2b

Sexual orientation

Requiring the identification of cultural, social or economic/commercial characteristics that are valued by the community aims to result in area visions that better reflect the needs of specific groups including the LGBTQ+ community. Impact score **+1**

Relevant PSED aim(s)

- 2b

People on low incomes

Potential positive impacts and score

By setting out a clear and consistent process for how characterisation should be done, the LPG increases the likelihood that consideration of factors such as air quality will inform how an area develops. Areas of greater deprivation tend to see high levels of air pollution, so this aspect of the guidance may benefit people on low incomes. Impact score **+1**

Relevant PSED aim(s)

- 2a

Optimising site capacity – A design-led approach LPG equality impacts, mitigating actions and justification

This section sets out the positive and negative impacts of the implementation of this guidance, both known and potential, for specified groups.

The objectives from the London Plan Integrated Impact Assessment (IIA) and the EqIA guide questions are used where relevant to structure the answers.

For negative impacts, mitigating actions to minimise or eliminate negative impacts are identified, along with any action plan. If negative impacts cannot be mitigated, an objective justification is provided. For positive impacts, considerations is given to how these could be maximised.

The impacts are scored as follows:

- +2 Strong positive
- +1 Positive
- 0 Neutral
- - 1 Negative
- - 2 Strong negative

Age (consider particularly children, under-21s and over-65s)

Potential positive impacts and score

The LPG requires site-capacity work to be informed by opportunities to enhance permeability and access to local services, employment and social infrastructure. This aims to provide better access for younger Londoners to education and employment opportunities; and better access for older Londoners to services such as shops, open spaces, public transport and community uses. Greater permeability, and attractive and safe routes, also positively benefits older people.

The LPG requires site capacity to be informed by and reflect requirements for green infrastructure, including open space on site in appropriate instances; and connection to green infrastructure elsewhere. This aspect of the LPG may benefit specific groups of children (those from a Black, Asian or minority ethnic background, and those on low incomes), whose engagement with the natural environment tends to be lower.

The requirement to consider noise as part of site-capacity work may benefit older Londoners affected by dementia, Alzheimer's and other related conditions.

Considering public transport accessibility levels when establishing potential site capacity can benefit younger and older Londoners as they tend to use buses than other age groups. As a result, they are likely to benefit from greater public transport accessibility. Impact score: **+1**

Relevant PSED aim(s)

- 2a

Disability (consider different types of physical, learning or mental disabilities)

Potential positive impacts and score

The LPG requires site-capacity work to be informed by opportunities to enhance permeability and access to local services, employment and social infrastructure. This is particularly important for disabled Londoners who face a range of barriers to walking (including physical barriers, pollution and noise) and barriers using streets and accessing public transport.

The requirement to consider air quality as part of site-capacity work may benefit disabled Londoners who are affected by chronic respiratory conditions. The requirement to consider noise may benefit disabled Londoners who are neurodiverse.

Considering public transport accessibility levels when establishing potential site capacity should reduce the likelihood of new development contributing to overcrowding on public transport, which is a significant barrier for disabled Londoners. Impact score: **+1**

Relevant PSED aim(s)

- 2a

Gender reassignment

No anticipated impacts.

Marriage and civil partnership

No anticipated impacts.

Pregnancy and maternity

Potential positive impacts and score

The LPG requires site-capacity work to be informed by opportunities to enhance permeability and access to local services, employment and social infrastructure. This is particularly important for those that are pregnant and have small children who face a range of barriers using streets and accessing public transport (specifically those that do not have step free access or access to toilets).

In areas where bus travel is higher, this may benefit pregnant women and those with children as they are more likely to use buses than other groups. Impact score: **+1**

Relevant PSED aim(s)

- 2a

Race or ethnicity (consider refugees, asylum seekers, migrants, Gypsies and Travellers)

Potential positive impacts and score

Considering public transport accessibility levels when establishing potential site capacity should lead to a greater proportion of new homes being close to transport and other social infrastructure. This can improve access to local services and employment. In areas where bus travel is higher, this may benefit Black Londoners as they are more likely to use buses than other groups. Impact score **+1**

Relevant PSED aim(s)

- 2b

Religion or belief

No anticipated impacts.

Sex

Potential positive impacts and score

Considering public transport accessibility levels when establishing potential site capacity can benefit women who live in areas where bus travel is higher, as women are more likely than men to use buses. Impact score **+1**

Relevant PSED aim(s)

- 2b

Sexual orientation

No anticipated impacts.

People on low incomes

Potential positive impacts and score

The guidance recognises that taller buildings do not always result in more affordable homes, and can result in reduced affordable housing as a proportion of total delivery; and that on some sites alternative lower-rise build types may be more appropriate. Inclusion of this in the guidance may lead to site-capacity work by boroughs and neighbourhood planning groups that optimises affordable housing delivery, which would benefit people on low incomes in particular.

Considering public transport accessibility levels can benefit Londoners on low incomes, as they are more likely to use buses than other income groups. Impact score **+1**

Relevant PSED aim(s)

- 2b

Small site design codes LPG equality impacts, mitigating actions and justification

This section sets out the positive and negative impacts of the implementation of this guidance, both known and potential, for specified groups.

The objectives from the London Plan Integrated Impact Assessment (IIA) and the EqIA guide questions are used where relevant to structure the answers.

For negative impacts, mitigating actions to minimise or eliminate negative impacts are identified, along with any action plan. If negative impacts cannot be mitigated, an objective justification is provided. For positive impacts, considerations is given to how these could be maximised.

The impacts are scored as follows:

- +2 Strong positive
- +1 Positive
- 0 Neutral
- - 1 Negative
- - 2 Strong negative

Age (consider particularly children, under-21s and over-65s)

Potential negative impacts and score

The LPG seeks to facilitate the development of small sites, which could in some instances include flatted development. These flatted homes are less likely to have access to private gardens, and may not result in new play spaces due to the small scale of development. This could have a negative impact on children if new homes do not have adequate access to green open space.

Increase in housing provision is vital for addressing the housing crisis, which will be of particular importance to young people and children as they grow older and seek accommodation. Intensification of the built-up area through small sites will help to achieve this in a more sustainable way than other options (such as not meeting need, displacing need to outside London or building on the Green Belt). The guidance is clear that any such developments should not cause a net loss of green cover. Impact score: -1

Relevant PSED aim(s)

- 2b

Disability (consider different types of physical, learning or mental disabilities)

No anticipated impacts.

Gender reassignment

No anticipated impacts.

Marriage and civil partnership

No anticipated impacts.

Pregnancy and maternity

No anticipated impacts.

Race or ethnicity (consider refugees, asylum seekers, migrants, Gypsies and Travellers)

Potential positive impacts and score

While the LPG is generally aimed at encouraging new dwellings, it could also be drawn on by boroughs to facilitate extensions to existing homes to provide for religious and ethnic groups who live in multi-generational households. When identifying small sites for redevelopment, the LPG highlights the opportunity to consider and identify other housing needs within an area, including Gypsies and Traveller accommodation. Impact score **+1**

Relevant PSED aim(s)

- 2b

Religion or belief

Potential positive impacts and score

While the LPG is generally aimed at encouraging new dwellings, it could also be drawn on by boroughs to facilitate extensions to existing homes to provide for religious and ethnic groups who live in multi-generational households. Impact score **+1**

Relevant PSED aim(s)

- 2b

Sex

No anticipated impacts.

Sexual orientation

No anticipated impacts.

People on low incomes

Potential positive impacts and score

The LPG encourages boroughs to proactively support well-designed new homes on small sites by developing design codes for small sites. While some larger small sites would be required to provide affordable housing, many smaller sites would not meet the thresholds for requiring this. This could be seen as negatively impacting on people on low incomes, who are most in need of affordable housing. However, the guidance cannot be seen in isolation; and the London Plan encourages development of a broad range of sites for housing including larger sites. It is likely that encouraging small sites through design codes would increase the delivery of housing overall, which would help to tackle housing affordability as well as providing affordable housing on sites that meet the relevant thresholds. Impact score **0**

Relevant PSED aim(s)

- 2b

Housing design standards LPG equality impacts, mitigating actions and justification

This section sets out the positive and negative impacts of the implementation of this guidance, both known and potential, for specified groups.

The objectives from the London Plan Integrated Impact Assessment (IIA) and the EqIA guide questions are used where relevant to structure the answers.

For negative impacts, mitigating actions to minimise or eliminate negative impacts are identified, along with any action plan. If negative impacts cannot be mitigated, an objective justification is provided. For positive impacts, considerations is given to how these could be maximised.

The impacts are scored as follows:

- +2 Strong positive
- +1 Positive
- 0 Neutral
- - 1 Negative
- - 2 Strong negative

Age (consider particularly children, under-21s and over-65s)

Potential positive impacts and score

The guidance requires wind assessments for buildings over 30 metres high. This may help to mitigate the impact of such buildings on the wind strengths at street level – something that may be beneficial for older Londoners and children, who are more likely to find that strong winds negatively affect their ability to get around.

The LPG sets out various measures that seek to make new buildings more thermally efficient, and minimise extremes of temperature. This could have a beneficial effect for older Londoners, who are more likely to be negatively affected by very hot and very cold temperatures.

The guidance requires development to respond to specific local needs such as specialised housing for older people and multigenerational housing.

The guidance promotes improvements to walking and cycling networks, the 'Healthy Streets' approach, cycle parking and other interventions that may help to increase levels of independent mobility for children and young people.

Older people and younger children, in particular, are likely to benefit from the incorporation of seating and shelter in new streets; the creation of public realm that is barrier-free; and requirements for drop-off points with dropped kerbs as set out in the guidance.

The guidance requires all apartment buildings to provide secure and convenient storage for mobility scooters and wheelchairs, which is likely to benefit older people.

Incorporating play opportunities, as required by the guidance, would be likely to benefit children and young people. The guidance reiterates the London Plan policy S4 requirement for an appropriate quantity of play space. The guidance also stipulates that family-sized homes should predominantly be on lower floors in order to provide good access to play and amenity spaces. This is likely to benefit children in particular.

Additional wording stating that the design of shared spaces should be inclusive has been added to the introduction sections of Parts A and B. Impact score: **+1**

Relevant PSED aim(s)

- 2b

Disability (consider different types of physical, learning or mental disabilities)

Potential positive impacts and score

The guidance encourages retention and reuse above demolition. This may help to improve air quality by reducing pollution from demolition and construction. The guidance reiterates the need for Air Quality Neutral and Air Quality Positive approaches and the submission of air quality assessments (as required in London Plan policy). The guidance also advises developments to locate habitable rooms away from sources of poor air quality. Improving air quality is an important issue for disabled people affected by chronic respiratory conditions.

The guidance requires wind assessments for buildings over 30 metres high. This may help to mitigate the impact of such buildings on the wind strengths at street level, something that may be beneficial for disabled Londoners, who are more likely to find that strong winds negatively affect their ability to get around.

The guidance requires provision of parking for adapted cycles and mobility scooters, which is likely to be beneficial to disabled Londoners in particular.

Disabled people, in particular, are likely to benefit from the incorporation of seating and shelter in new streets; the creation of public realm that is barrier-free; and requirements for drop-off points with dropped kerbs, as set out in the guidance.

The guidance reiterates the requirements of London Plan policy D7 for wheelchair user dwellings, and accessible and adaptable dwellings; and requires proposals to demonstrate that an inclusive design approach has been taken. The guidance requires internal circulation space to provide accessible routes and stipulates that corridors should be at least 1,500mm wide, with consideration for additional width adjacent to cores. The guidance reiterates the need (set out in policy D5) for a fire evacuation lift. These aspects of the guidance would be likely to benefit disabled people.

The guidance requires all apartment buildings to provide secure and convenient storage for mobility scooters and wheelchairs, which is likely to benefit disabled people.

The guidance requires communal refuse and recycling facilities to be accessible and usable by wheelchair users.

The guidance recommends larger private outside space as best practice, in order to enable wheelchair users to manoeuvre more easily.

The LPG sets out requirements for public realm, shared areas and active travel routes that are safe. This may benefit disabled people, who in recent years have experienced significant increases in levels of hate crime. Impact score: **+1**

Relevant PSED aim(s)

- 2a
- 2b

Gender reassignment

Potential positive impacts and score

The LPG sets out requirements for public realm, shared areas and active travel routes that are safe. This may benefit trans people, who experience high levels of harassment in the street and increasing levels of hate crime. A significant proportion of trans people report avoiding certain streets because of a lack of feeling safe. Impact score: **+1**

Relevant PSED aim(s)

- 1
- 2a

Marriage and civil partnership

No anticipated impacts.

Pregnancy and maternity

No anticipated impacts.

Race or ethnicity (consider refugees, asylum seekers, migrants, Gypsies and Travellers)

Potential positive impacts and score

The guidance encourages retention and reuse above demolition. This may help to improve air quality by reducing pollution from demolition and construction. The guidance reiterates the need for Air Quality Neutral and Air Quality Positive approaches, and the submission of air quality assessments (as required in London Plan policy). The guidance also advises developments to locate habitable rooms away from sources of poor air quality. This aspect of the LPG may benefit Black/African/Caribbean/Black British Londoners, and Londoners of mixed, multiple or other ethnicities, who tend to be slightly more exposed to pollution than the rest of the population. Impact score **+1**

Relevant PSED aim(s)

- 2a

Religion or belief

Potential positive impacts and score

No anticipated impacts.

Sex

Potential positive impacts and score

The LPG sets out requirements for public realm, shared areas and active travel routes that are safe. This may benefit women and girls, given increasing concerns around the safety of women and girls. Impact score **+1**

Relevant PSED aim(s)

- 1
- 2a

Sexual orientation

No anticipated impacts.

People on low incomes

Potential positive impacts and score

The guidance encourages retention and reuse above demolition. This may help to improve air quality by reducing pollution from demolition and construction. The guidance reiterates the need for Air Quality Neutral and Air Quality Positive approaches, and the submission of air quality assessments (as required in London Plan policy). The guidance also advises developments to locate habitable rooms away from sources of poor air quality. Areas of greater deprivation tend to see high levels of air pollution, so this aspect of the guidance may benefit people on low incomes. Impact score **+1**

Relevant PSED aim(s)

- 2a

Overview of equality impacts

This table summarises the scoring of the impacts for each group identified in the previous section.

Category	Characterisation and growth strategy LPG	Optimising site capacity – A design-led approach LPG	Small site design codes LPG	Housing design standards LPG
Age	+1	+1	-1	+1
Disability	+1	+1	No anticipated impacts	+1
Gender reassignment	+1	No anticipated impacts	No anticipated impacts	+1
Marriage and civil partnership	No anticipated impacts	No anticipated impacts	No anticipated impacts	No anticipated impacts
Pregnancy and maternity	+1	+1	No anticipated impacts	No anticipated impacts
Race	+1	+1	+1	+1
Religion and belief	+1	No anticipated impacts	+1	No anticipated impacts
Sex	+1	+1	No anticipated impacts	+1
Sexual orientation	+1	No anticipated impacts	No anticipated impacts	No anticipated impacts
People on low incomes	+1	+1	+1	+1

Amendments to the guidance

Change	Reason for change
<p>What changes have you made to the guidance as a result of this EqIA?</p>	<p>Why have these changes been made?</p>
<p>Characterisation and growth strategy LPG: Section 4.5 of the LPG states that the assessment of different needs of specific groups within the community should be informed by the community engagement and consultation that the local planning authority carries out.</p>	<p>Making it clear that a needs assessment should involve, and be informed by, community engagements aims to ensure that visions for different areas result in places that are more inclusive for disabled people and older people in particular, given the (often physical) barriers that these groups face, which prevent environments from being inclusive and accessible for them.</p>
<p>Small Site Design Codes LPG: Additional wording stating that when boroughs identify small sites for redevelopment, they should also consider other housing needs within an area, including Gypsies and Traveller accommodation.</p>	<p>This change has been made to encourage practitioners to consider the wider needs of an area when undertaking this process. This may include Gypsy and Traveller accommodation, or other specialist forms of housing/accommodation.</p>
<p>Housing design standards LPG: Additional wording stating that the design of shared spaces should be inclusive has been added to the introduction sections of Parts A and B.</p>	<p>These changes have been made to reiterate the importance of designing inclusive spaces. Clarifying this importance aims to make it clearer to the designer of residential applications, and ensure that new development is more inclusive.</p>

Recommendation

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

Outcome number	Description	Recommended
Outcome one	No major change to the guidance is required: this EqIA has not identified any potential for discrimination or negative impact, and all opportunities to advance equality have been taken.	Yes
Outcome two	Adjustments to the guidance are required to remove barriers identified by the EqIA or better advance equality.	No
Outcome three	Justify and continue with the guidance despite having identified some potential for negative impacts or missed opportunities to advance equality.	No
Outcome four	Stop, rethink or abandon when the EqIA shows actual or potential unlawful discrimination	No

Monitoring

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

Appendix A: Evidence Reference and Content

London Plan IIA (including EqIA) and Addendums

Evidence

Age

[ONS](#), 2011

London boroughs have a relatively young population. The median age of Londoners is 35, compared to a national average of 40. 32 per cent of Londoners are under 25; and 11 per cent are 65 or over.

[London Travel Demand Survey](#), 2016-17

Older Londoners (aged 65 or over) are more likely to be women

[GLA City Intelligence Unit](#), 2018

In 2019, over a fifth of London's population were under 16 (1.9m). Over two-thirds, or 6.2m, were working age (between 16 and 64), and less than one in eight were 65 or over (1.1m). Despite being the smallest age group in London's population, the number of Londoners aged 65 or over is projected to increase by 86 per cent between 2019 and 2050, faster than younger age groups.

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

Data at a national level reveals that some groups of children are less likely to engage with the natural environment. This includes children who are Black, Asian or Minority Ethnic (BAME), 56 per cent of whom make at least one visit a week to green space. This is compared children who are not from BAME backgrounds (74 per cent); and children whose parents are from a lower social class, with a gap in weekly visits of 12 percentage points between the highest social grade (77 per cent) and the lowest (65 per cent).

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

More than one in five reception children in London are overweight or obese, rising to more than a third of year 6 pupils: five percentage points greater than the national rate. Black and Asian children are more likely to be overweight or obese in London than White children. At year 5, children living in the most deprived areas are 14 percentage points more likely to be overweight or obese than children in the least deprived areas.

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

There are several specific barriers that older Londoners face which can limit their confidence and ability to access buildings, places and spaces, contributing to feelings of social isolation. Issues such as speed of traffic, noise, and fear of crime or falling affect half of older people – especially people in sheltered accommodation or care homes, and

people with physical or cognitive impairments. Older Londoners also face barriers accessing public transport in London, including overcrowding, antisocial behaviour and a lack of universal step-free access.

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

Use of London buses is higher among Black, younger and low-income Londoners, and women.

Disability

[ONS](#), 2017

Between 2015 and 2017, 16 per cent of working-age Londoners (16 to 64) were disabled. This is slightly less than the national average for Great Britain of 20 per cent, reflecting London's younger population.

[ONS](#), 2019

There are 1.3m disabled adults in London, defined according to the Equality Act 2010 as having a physical or mental impairment that has a 'substantial' and 'long-term' negative effect on their ability to do normal daily activities. Disability is closely related to age: 13 per cent of the working-age population are disabled versus 28 per cent of people aged 65 or over. 56 per cent of disabled Londoners are women, compared with 50 per cent of non-disabled Londoners.

[ONS](#), 2011

14 per cent of Londoners consider themselves to have a disability that affects their day-to-day activities 'a lot' or 'a little'.

[London Travel Demand Survey](#), 2016-17

Disabled people are also more likely to be on a low income (61 per cent of disabled people are also on low income). 34 per cent of disabled Londoners have a household income of less than £10,000 compared with 10 per cent of non-disabled Londoners. 84 per cent of disabled Londoners report that their disability limits their ability to travel. 55 per cent of disabled Londoners state that their disability affects their mobility; 22 per cent have a serious long-term illness; and 10 per cent have a mental health condition. Many disabled people experience multiple impairments.

According to GP records, approximately 2 per cent of London's population, or around 175,000 people, have a learning disability (Public Health England in GLA, 2019).

[Equality and Human Rights Commission \(EHRC\), The housing experiences of disabled people in Britain](#), 2018

Key factors for successful independent living for disabled people include accessibility features such as adapted kitchens and bathrooms; a feeling of safety and security and being in a good location with access to shops, transport and public services. There is a lack of availability of accessible housing across all tenures. Living in unsuitable accommodation can cause deterioration in mental wellbeing. Appropriate housing is often either unavailable or unaffordable.

Disabled people in the private and social rented sectors were more likely to have experienced poor housing than disabled homeowners. Although homeowners overall had

more choice and control over their housing, many had experienced considerable difficulty purchasing accessible homes, particularly within an affordable price range.

[LSE, No Place Like an Accessible Home: Quality of life and opportunity for disabled people with accessible housing needs, 2016](#)

At least 1.8m households (one in 12 of all households) in England have an identified need for accessible housing, of whom 580,000 (one-third) are working age. 0.7m households (around one in 30 of all households) have more significant needs corresponding roughly to Building Regs 2/3. Real need is estimated to be higher, as the English Housing Survey does not include figures for disabled children.

[DCLG, English Housing Survey Adaptations and Accessibility Report, 2014-15, 2016](#)

In England in 2014, there were around 814,000 households (4 per cent) with a wheelchair user. Around 521,000 (64 per cent) of these households included someone who only required a wheelchair outside the home; while 210,000 (26 per cent) of these households contained someone who used a wheelchair all the time. The remaining 84,000 households (10 per cent) had someone who just used their wheelchair when indoors. Among all households with a wheelchair user, 84 per cent (685,000) lived in a home that did not have full visitability – including the 19 per cent (158,000) who lived in a home that lacked any of the four following features: level access to the entrance; a flush threshold; sufficiently wide doorways and circulation space; and a toilet at entrance level. These households most commonly had only one visitability feature (32 per cent).

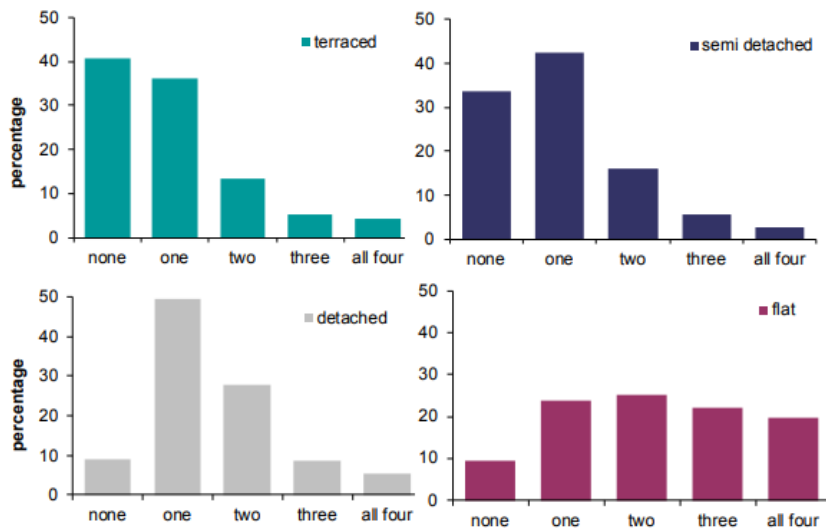
Terraced (41 per cent) and semi-detached (34 per cent) houses were far more likely to have none of the four accessibility features than detached houses (9 per cent) or flats (10 per cent). The majority of homes lacking full visitability could be adapted to provide all four features. It was more difficult for terraced houses and older properties to be made fully visitable. Terraced houses were the most likely dwelling type in which full visitability was unfeasible (50 per cent) compared with flats (27 per cent), and other houses (semi-detached, 15 per cent; and detached, 14 per cent).

In 2014-15, one in 10 households (10 per cent) that included a person with a long-term limiting disability requiring adaptations wanted to, or were trying to, move somewhere more suitable for their needs. Nearly half of the households (47 per cent) that wanted to move somewhere more suitable contained a person with a long-term disability aged under 55.

In 2014, almost two-thirds (64 per cent) of homes had a toilet at entrance level; but the presence of the other three visitable features were less common – especially level access, which was present in just 18 per cent of homes. Of the other accessibility features assessed by the English Housing Survey, the most common in 2014 were the absence of any trip steps (75 per cent); and the presence of a room at entrance level that could be converted into a bedroom (56 per cent). Less common were the presence of a bathroom at entrance level (39 per cent), and straight stairs (for the installation of a stair lift) with a sufficiently wide landing to allow wheelchair access (24 per cent). Just a fifth had a wheelchair-accessible toilet at entrance level (20 per cent).

Although a quarter of newer homes built since 1990 (24 per cent) could be made compliant with minor works only, a similar proportion (25 per cent) of these homes were not feasible for full visitability. This latter finding can be partly explained by the dwelling-type profile of newer homes – namely, the relatively high proportion of flats that have been built; where these are not fully visitable, it is often impractical to extend or redesign these homes.

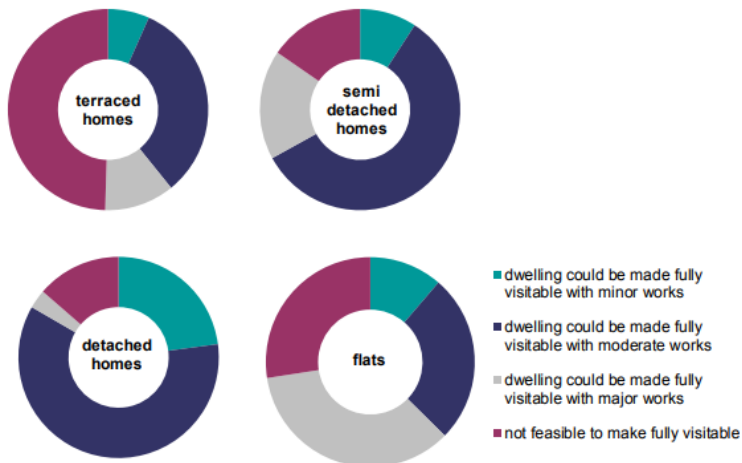
Figure 2.4: Number of visitability features, by dwelling type, 2014



Base: all dwellings
 Note: underlying data are presented in Annex Table 2.2
 Source: English Housing Survey, dwelling sample

Improving the accessibility of terraced homes would be the most challenging project, with half (50 per cent) of these homes simply not feasible for full visitability in 2014. This is partly because smaller and mid-terraced homes do not easily allow for any moderate or major adaptations, such as the rearrangement of internal space or building extensions to take place. There are similar issues with extensions to upper floor or basement flats; and so 27 per cent of flats were not feasible for visitability. Over half of semi-detached (58 per cent) and detached homes (60 per cent) could be made fully visitable through a moderate level of work; but 15 per cent and 14 per cent respectively were not feasible for compliance with visitability.

Figure 2.5: Level of work required to create full visitability by dwelling type, 2014



Base: all dwellings
 Note: underlying data are presented in Annex Table 2.3
 Source: English Housing Survey, dwelling sample

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

Disabled Londoners face barriers to accessing public transport in London, including overcrowding, antisocial behaviour, and a lack of universal step-free access. There has been a major growth in the number of hate crime victims who are disabled, increasing five-fold between 2014-15 and 2016-17.

Gender reassignment

EHRC, 2012

There are no current data sources on gender identity in London or the UK as a whole. Research carried out in 2012 on the acceptability of gender-identity questions in surveys provided an indicative estimate that 1 per cent of the UK population identify as trans. The Government Equalities Office tentatively estimated that around 0.3- 0.8 per cent of the UK population in 2018 were transgender (approximately 200,000 to 500,000 people).

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

Between 2014-15 and 2016-17 there was a threefold increase in the number of hate crime victims who were trans.

[Stonewall, LGBT in Britain – Trans report](#), 2018

Trans people experience high levels of discrimination and poor treatment because of their gender identity, and often change their behaviour because of these factors. Examples of this discrimination and poor treatment range from verbal abuse and intimidation in the street and other public spaces, such as toilets, to being discriminated against in shops, cafés, restaurants, bars and nightclubs. Trans people also face discrimination when using public services, and when looking for a house to rent or buy. More than two in five trans people (44 per cent) avoid certain streets altogether because they don't feel safe there as an LGBT person.

Marriage or civil partnership

In 2015, 5 per cent of partnerships formed in London were same-sex marriages or civil partnerships. In 2011, 39.8 per cent of adults in London aged 16 and over were married, and 0.4 per cent were in a same-sex civil partnership. The national respective figures were 46.6 per cent and 0.2 per cent.

Pregnancy and maternity

[ONS](#), 2017

The total fertility rate (the number of children that a woman with average fertility would have) is 1.70 in London, compared to a national figure of 1.76. In London the general fertility rate (births per 1,000 women aged 15-44) is 62.9 per cent, compared to 61 per cent for England and Wales. The crude birth rate (births per 1,000 population) is 14.3, compared to 11.6 for England and Wales. 58 per cent of live births are borne by mothers who were themselves born outside the UK, compared to a national average of 28 per cent.

Pregnant women, and people on maternity and paternity leave using buggies, are more likely to require level access to buildings. Housing types without level access, such as linear blocks that are four storeys or less and lack lift access, may be more difficult to access.

Pregnant women may also be negatively affected by overcrowding on public transport.

Race

[ONS](#), 2011

BAME Londoners make up 40 per cent of London's population. BAME Londoners are more likely to be younger and on lower incomes. Most Londoners have English as their main language (78 per cent). However, 4 per cent do not speak English well.

[London Travel Demand Survey](#), 2016-17

44 per cent of people on low incomes in London are BAME. Cost of travel is more often mentioned as a barrier to public transport use by BAME Londoners (51 per cent). BAME Londoners are more likely to live in households with an average annual income below £20,000 (33 per cent BAME compared with 25 per cent White).

Research by Sport England (2020) shows that people from Asian and Black backgrounds are far more likely to be physically inactive than those who are White.

[Institute of Fiscal Studies](#), 2020

Research shows that Black people are more likely to be overweight than White people, while both Asian and Black populations have been found to have a higher risk of diabetes and heart disease.

[English Housing Survey](#), 2018

Just under a third of Bangladeshi households are classified as overcrowded, as are 15 per cent of Black African households, according to the. Only 2 per cent of White British households are classified as overcrowded.

[ONS](#), 2011

18.9 per cent of Black households are made up of a single parent with dependent children, the highest percentage out of all ethnic groups for this type of household; the lowest percentage was found among Asian households, at 5.7 per cent.

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

Black/African/Caribbean/Black British Londoners are slightly more likely to be exposed (15 per cent versus 13 per cent of the population). A similar result has been found for people of a mixed, multiple or other ethnicity, with only White and Asian/Asian British Londoners accounting for a smaller share of people exposed than their share of the population. Use of London buses is higher among Black, younger and low-income Londoners, and women.

Religion or belief

[ONS](#), 2011

The 2011 Census shows that the representation of religion and beliefs of Londoners has changed over the past 10 years. There has been a decline in the proportion of Londoners considering themselves to be Christian (from 58 per cent to 48 per cent). There has also been an increase in the proportion who do not identify with any religion (from 16 per cent to 21 per cent). Religion varies considerably between ethnic groups. While 28 per cent of White Londoners, and 27 per cent of mixed ethnicity Londoners, report they have no religion, only 7 per cent of Black and 8 per cent of Asian Londoners report this. More than half of Black Londoners (68 per cent) and White Londoners (57 per cent) report that they are Christian. Asian Londoners, and Londoners who have selected 'other' to describe their ethnic group, are most likely to be Muslims (36 per cent of Asian Londoners and 50 per cent of Londoners selecting 'other' ethnic group are Muslims).

Research by the EHRC highlights that, in England, there is a higher percentage of Christians recorded as being overweight or obese (66.6 per cent), compared with people that have no religion (55 per cent). The percentage of religious minorities recorded as overweight or obese was 56.4 per cent in 2012.

Sex

[ONS](#), 2011

Half of Londoners are women (51 per cent).

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

In 2018, the GLA projected that, in 2019, 4.55m Londoners would be female and 4.55m would be male. Women face particular issues around gender-based violence and low pay. As the majority of lone parents (90 per cent) are women, recent reforms to welfare that have affected lone parents have had a disproportionate impact on women.

[ONS](#), 2011

18.9 per cent of Black households, and 16.2 per cent of mixed ethnicity households, were made up of a single parent with dependent children, the highest percentages out of all ethnic groups for this type of household. The lowest percentage was found among Asian households, at 5.7 per cent, followed by White households, at 6.7 per cent.

[EHRC](#), 2018

Women sharing other protected characteristics often face additional challenges, such as higher gender pay gaps among older and BAME women (All-Party Parliamentary Group on Sex Equality, 2018). Young women report issues around financial pressures and mental health issues (Young Women's Trust, 2017). Men face issues around lower educational attainment and are at higher risk of suicide.

[London Travel Demand Survey](#), 2016-17

Londoners living in a lower-income household (less than £20,000 per year) are more likely to be women.

[ONS](#), 2011

Women in London are more likely to be older. Men are more likely than women to be working full-time. Women are more likely to be unemployed than men; and are more likely to work part-time. Women are more likely than men to be travelling with buggies. This could mean that women are more likely to be affected by lack of level access and overcrowding.

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

Use of London buses is higher among Black, younger and low-income Londoners, and women.

[Jenny Divine and Aude Bicquelet-Lock, for RTPi: Women and Planning \(Part II\) – Creating Gender-Sensitive Urban Environments Post-Covid-19: Challenges and Opportunities](#), 2021

Many cities have developed in ways that are biased toward the needs of men, including a focus on car-based transport rather than walking and public transport; lack of easy access to a variety of employment opportunities; a traditional commuting pattern that promotes long commutes into city centres; public spaces that are unsuitable for people with pushchairs and buggies; loss or lack of public toilets; and lack of safety considerations at night.

Sexual orientation

Statistics about the size of the LGB population vary considerably and there is no single widely accepted measure. The 2017 GP Patient Survey found that 5.4 per cent of Londoners identified as lesbian, gay, bisexual or 'other', compared to the national rate of 3.3 per cent. Figures from the 2017 Annual Population Survey provide lower estimates for London and England (3.2 per cent and 2.6 per cent respectively).

LGB Londoners are significantly more likely than heterosexual Londoners to have experienced incidents of unwanted sexual behaviour or hate crime.

LGBT young people are more likely to find themselves homeless than their non-LGBT peers, comprising up to 24 per cent of the youth homeless population.

People on low incomes

[Equality, Diversity and Inclusion Evidence Base for London](#), GLA Intelligence, June 2019

Areas of greater deprivation tend to see high levels of air pollution. Use of London buses is higher among Black, younger and low-income Londoners, and women.

Gaps in evidence

None identified

Appendix B: Engagement summary

Summary of protected groups engaged and engagement record

Already engaged:

The guidance has been developed by a broad network of built environment and planning professionals, including Mayor's Design Advocates.

Young Londoners working with the Stephen Lawrence Trust have had their say on the role that housing has in shaping our neighbourhoods and boroughs.

Urban Design London has provided a platform for borough officers to offer its expertise.

Engagement record

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

Event details	Specific groups represented	Key findings
August 2018	Young people	GLA workshop facilitated by Mae Architects and the Stephen Lawrence Charitable Trust, engaging young Londoners on the key quality-of-life indicators and priorities from their perspective.