#### MAYOR OF LONDONLONDON ASSEMBLY

# **EqIA - Good Quality Homes for all Londoners**

## **Key information**

Publication type: London Plan Guidance

Publication status: Draft

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### 1. Equality Impact Assessment (EqIA) for London Plan Guidance

Good Quality Homes for All Londoners – draft for consultation

London Plan Guidance:

October 2020

1. Please provide an outline of the guidance, who it is aimed at and any key issues to be aware of.

Housing need exceeds supply in London. This guidance supports, amongst others, boroughs, developers and architects to identify potential sites and assess development potential and deliver high quality appropriate housing that makes the best use of available land. It aims to support boroughs to implement Intend to Publish London Plan (hereafter referred to as London Plan) Policies notably D1 – D7 and H2, which establish the principles of optimising site capacity through a design-led approach. This guidance provides further details on carrying out this process, with a particular focus on the role of good quality housing design.

The guidance comprises a suite of 4 modules. Module A sets out a process for assessing sites' suitability, particularly at the plan-making stage. It contains a method for conducting site analysis (including engagement), understanding a site's attributes, context and capacity for growth, and using standard residential types, which meet quality standards to identify potential densities.

Module B includes further detail on identifying opportunities and delivering on small sites – a key component of boosting overall housing supply for Londoners. It also provides example design codes to aid boroughs.

Design quality is a key consideration when working out how to make best use of land in London. Quality housing is important for physical and mental wellbeing. The guidance embeds high-quality design in its approach, to ensure quality of life for residents, encouraging stakeholders to consider this at the start of the process. Module C includes, inter alia, considerations such as daylight, access to outdoor space, safety, comfort, bin storage, security, dual aspect outlook, minimum ceiling heights, and space standards. Finally, Module D offers a set of best practice case studies.

Seven conventional housing types are provided in Module A, alongside their characteristics and performance against Module C's housing standards. The housing types are the most commonly recognised in London and they have been assessed by their characteristics, access and circulation and ability to meet the housing design quality standards. The housing types are used to calculate potential site capacity, helping to determine the appropriate built form and scale for making the best use of a site. No one building type is favoured – it depends on what is appropriate to the site's context. Furthermore, the development of hybrid types in response to local circumstances and needs is possible. Types that vary from recommended forms should be assessed against housing design standards. It should be noted that the guidance does not cover student or specialist housing, such as older people's housing.

Using building types to plan site capacity is a new design-led approach set out in the London Plan. It replaces a formulaic calculation of potential site capacity based upon PTAL and residential character that did not sufficiently take into account a site's potential when calculating capacity. A design-led method, together with housing typologies, is based on the idea that London's urban landscape consist of familiar, repeatable types brought together to work in coherent urban environment. The types recommended are the most commonly recognised in London and are best placed to address quality and standards. It is designed to support applicants and decision makers to understand a site's capacity for growth and what appropriate development is likely to consist of prior to a proposal coming forward. The guidance and tools are likely to benefit boroughs by standardising the process across London.

Housing types are suggested as being more suitable for small sites are residential conversions and extensions, individual houses, clusters of houses or stacked maisonettes. Housing types more suitable for large sites are outlined as terraces, linear blocks, villa blocks and towers.

Boroughs are expected to meaningfully consult as part of their approach to working out site capacity. Meaningful consultation is crucial to understanding the needs of residents and the successful integration of new residents into existing communities. Proposals should demonstrate how local resident groups and other stakeholder groups have been engaged to influence design

2.	2. Which of the Public Sector Equality Duty aims are relevant to the guidance and the impacts id	entified?

The Public Sector Equality Duty (PSED) set out at Section 149 of the Equality Act 2010 is likely to be relevant to the guidance. Listed below are examples of how the guidance seeks to meet the three aims of the PSED:

1. eliminate discrimination, harassment and victimisation and other conduct prohibited under the Act;

The guidance builds on the London Plan policies, which aim to ensure that residents are not treated different depending on whether they occupy affordable housing or market rent. For example, design quality standards relating to open space notes that children's play space should be designed to be accessible to all tenures and be safely accessed from the street by children and young people independently.

The guidance also emphasises the importance of meaningful community engagement by boroughs, in accordance with up to date Statements of Community Involvement, to support the development of site allocations/ design codes that reflect the concerns and aspirations of Londoners living in existing neighbourhoods likely to be affected by from the change. Requiring that the site allocation process should include meaningful engagement and collaboration with stakeholders will help applicants and decision makers to understand and identify what the diverse needs of the local population are and so be able to respond to these needs through the design of development.

2. advance equality of opportunity between people who share a protected characteristic and those who do not;

The housing standards included in the guidance highlight, in greater detail the importance of development creating places that everyone (including children and young people, older people, disabled people, people with young children and people with other protected characteristics) can use confidently, independently, and with choice and dignity. The importance of considering inclusive design early on and throughout a scheme's development (from initial concept through to completion and in the on-going management and maintenance of the development) is emphasised.

Many of the housing design standards, such as 'Designing for a Diverse City', help to ensure that developments and their wider environments meet the needs of people with protected characteristics, help to reduce barriers, and could encourage the participation of groups that are less represented in activities. For example, design standard 'cycle parking' sets out the importance of accessible cycle parking with adequate spacing and facilities for larger cycles, such as adapted cycles. Stores should have step free access. Cycle storage identified in habitable rooms or on balconies is not acceptable.

Accessibility is a thread throughout the standards, e.g. C1.4 Open space highlights the importance of accessible and well-designed open spaces. Design standard C2.3 sense of community highlights the importance of homes being designed to be flexible and easily adaptable as possible, so

#### 1.1 Assessment

#### List aspects of the guidance that might affect particular groups

Guidance key aspects, chapter headings, theme etc	Particular group that could be affected
Module A	Positive: Age, Disability, Pregnancy and Maternity, Race, Sex, Sexual orientation, People on low incomes  Negative: Age, Disability, Pregnancy and Maternity, Race, Religion or belief, Sex, People on low incomes
Module B	Positive: Disability Negative: Disability
Module C	Positive: Age, Disability, Gender reassignment, Pregnancy and Maternity, Race, Religion or belief, Sex, Sexual orientation, People on low incomes Negative: Age, Disability, Sex, Race
Module D	NA. Document contains best practice examples based on guidance set out in Modules $\mathbf{A} - \mathbf{C}$

<sup>\*</sup> it should be noted that the general policy requirement and principles are already required through the London Plan. This draft London Plan Guidance is providing further detail on how the policies should be implemented, and therefore further amplifying the effects.

Equality impacts, mitigating actions and justification (where applicable)

Modules A and B

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, an 3)
Age	Positive  Overshadowing and overheating are key design considerations, which could benefit groups that are less likely to spend time outdoors, such as older people who are more likely to have a disability.	2b
	Emphasis on considering air pollution as part of site characteristics, and reducing air pollution through sufficient well-designed mitigation measures with consideration for uses by groups particularly affected (e.g. avoiding children's play areas being located in areas of high pollution). This could benefit young and older people, who are more likely to be negatively affected by poor air quality.	1, 2b, 2c
	Flood risk is reduced as developers should prioritise areas least likely to flood. This could particularly benefit young and older people who are particularly vulnerable in the event of a flood, as they are less likely to be able to escape independently. Whilst not encouraged by the guidance, development within a flood zone or over a certain size requires a full flood risk assessment. If approved an evacuation strategy must be provided.	2a, 2b
	Emphasis on connectivity, accessible walking routes, step-free changes, and sufficient infrastructure provision (particularly for larger sites e.g. bus and rail, services and facilities). This is likely to benefit young and older people through supportive travel by means of walking, cycling and using public transport where possible.	2a, 2b, 2c

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
Incremental densification of small sites is encouraged by London Plan policy - which has been subject to an EqIA - in existing residential areas, taking into account PTAL and/or distance from a rail station. This will support access to local services, benefitting particularly people who are less mobile, such as older people who are more likely to be affected by disability.	2a, 2b, 2c	

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSEI (1, 2a, b or c, at 3)
Considering how issues intersect (e.g. walking routes in areas of lower air and noise pollution) guidance is likely to benefit protected groups by encouraging active travel where possible. It may also positively impact children and older people by reducing their exposure to poor air quality, which research shows these groups are particularly vulnerable to.	1, 2a, 2b, 2c	
Emphasis on connectivity alongside density is likely to encourage active means of travel where possible by reducing overcrowding, a commonly cited barrier to greater public transport use cited by young people and older people Transport for London (2019).	2a, 2b, 2c	

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
Improving digital infrastructure provision could positively impact older people, who are less likely to be online, and young people from low income households or who are in larger families, who may have more limited digital access. It is also likely to support people to work from home, including working parents alleviating potential issues around childcare.	2b, 2c	
Play space emphasised to meet the needs of children and young people, including ensuring access to the same spaces across tenures.	2b, 2c, 3	

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
Encouraging the promotion of higher density developments in areas that are well connected e.g. to services and infrastructure may help to provide more opportunities for Londoners to actively participate in the city's life, decision making and communities which could represent a positive impact for groups who are at higher risk of social isolation including older people and people aged 20-24.	2b, 2c	
Housing types  B - House: Private amenity space may be more appropriate for families with children, including young people with Autism.	2a, 2b	

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
C – Cluster: Communal outdoor space opportunities could help to meet the needs of children and older people, by ensuring access to outdoor space and reducing isolation.	2a, 2b	
D – Terraces: Private gardens or courtyards likely to benefit children and older people.	2b	
E – Linear blocks: Lower floors may be more suitable for families with children due to access to outdoor space and if there is no lift access (in exceptional circumstances in blocks with 4 storey's or less). Upper floors likely to be suitable for older people if provided with lift access.	2a, 2b	

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
Negative  Access to waste and recycling facilities for people with disabilities may be more difficult if the development doesn't have lift access.	2a, 2b	Development proposals should ensure that comm refuse, recycling food waste conta communal bin enclosures and restores are easily accessible to and usable by all resincluding childred disabled people, located on a hard level surface.

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, an 3)
In exceptional circumstances, site conditions may make it impossible to provide private outside space for all dwellings. This may negatively impact children and young people.	1, 2a, 2b, 2c, 3	Where in excepticircumstances proutdoor space cabe provided, additional internaliving space may instead be provided equivalent to the private open space requirement, addithe minimum GI and the minimum GI and the dwelling. Justification will to be made as to external private outside space can be provided.

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
Housing types  E – Linear blocks: Limited private direct rear gardens access could mean this type of housing is less suitable to families with children, particularly families with children with disabilities where there is no lift access (in exceptional circumstances in blocks with 4 storey's or less).	2b	Lack of direct acto a garden for families is believed be mitigated by the provision of communal outdon space, which shous the development accessible by chinand families from different tenures. Communal outdon space can bring positive impacts families with children, by encouraging opportunities to rand for children the play together. Since one site communal spaces might be allikely to be used older people how potentially due to noise and lack of space. The guida in Module C also requires that all dwellings should provided with adequate private outside space however in the form of a garden terral communication.

of a garden, terra

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
Maisonettes at ground level to provide family units where required. This may limit choice for other protected groups with smaller household sizes, such as older people, and negatively impact them by reducing their direct access to a garden.	2b	Providing direct access to a garde families with chi is likely to positi impact on their h The provision of communal outdo space and private outside space such balconies ensures smaller househol which may included older people, still have access to outdoor space and health benefits associated.

l r			
	Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, an 3)
	As set out in the parent London Plan policy, in exceptional circumstances, in linear blocks of 4 storeys or less, lift access may not be provided to upper levels. This could limit choice for older people, who are more likely to be disabled. It could also reduce the ability of older people to visit occupants of upper floors, both in terms of friends and family and employees of organisations, as they may find it more difficult to access the upper floors. It could also make it harder for families with small children, and children with disabilities to access.	1, 2a, 2b, 2c, 3	The cost of includifts in linear bloof 4 storeys or lecould negatively impact on the viability of the development, as costs may be too for occupants. Furthermore, lift access is provided upper levels in liblocks of 4 storemore, and alternational housing types, surface to the sinclude lift provided upper levels in liblocks of 4 storemore, and alternational housing types, surface will alway include lift provided lift provided lift provided lift provided which is characteristics, however it ensure that housing is provided which is the needs of peopwithout physical disabilities. Including a blocks that 4 storeys or less without lift access helps to ensure viability of the scheme and mee housing needs of people without a physical disability.

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
F – Villa blocks: Without lift access, families with small children and/or children with disabilities, and older people on upper floors may be negatively affected	1, 2a, 2b, 2c, 3	The cost of inclulift access in villablocks could make scheme unviable. Alternative types housing, which a accessible, is inclinity the guidance to ensure that needs older people, who more likely to be disabled, are met Including housin types without lift access means that housing is develot to meet the needs younger people a families, who are likely to have a disability.
Disability	Positive  The further guidance on Design and access statements, which are a statutory requirement for certain development, should maximise opportunities for access and inclusion.	1, 2a, 2b, 2c, 3

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
Importance of considering access to open space and public transport, and impact of overshadowing (disabled people more likely to be isolated).	1, 2a, 2b, 2c, 3	The positive imp of this guidance of the maximised by encouraging applicants to proof 'pioneering' Circ Economy Statem which go beyond standard practice the minimum requirements for Statements set out he guidance. The guidance outlines applicants can put his status, which be encouraged through the development management proof
Taller buildings less appropriate for narrower street widths. This could help to reduce overcrowding, encourage active travel by people with disabilities and reduce isolation.	2b, 2c, 3	

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
Ensuring inclusive public access to heritage asset viewing locations as required by the London View Management Framework. Heritage assets can provide landmarks that aid navigation, which can support people with wayfinding.	1, 2a, 2b, 2c, 3	

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
The importance of reducing resident exposure to air pollution is highlighted (e.g. using air quality data to inform residential type and location, engaging with air quality experts, developing mitigations such as increasing distances between buildings and busy roads, considering throughout development and the impact of multiple developments), which should positively impact people with disabilities who are more likely to be affected.	1, 2a, 2b, 2c	
Ways to reduce noise pollution are suggested, which are likely to benefit people with disabilities, for example Autistic people who are more likely to be sensitive to noise.	2a, 2b, 3	

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
Minimising the negative impacts from construction and demolition could positively impact people with a visual impairment, who are particularly affected by changing routes and street clutter.	2a, 2b, 2c, 3	
Prioritising areas least likely to flood and including mitigation (e.g. locating vulnerable users or people on upper floors) is likely to positively benefit people with disabilities.	1, 2a, 2b	

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
Addressing flood risk, urban heat and poor air quality through well-designed green infrastructure could positive impact children and young people, older people and people with disabilities, who are more vulnerable to these issues.	1, 2a, 2b, 2c, 3	
Phasing development to coincide with new infrastructure may help to reduce overcrowding, which can be a concern for people with disabilities and older people when using public transport. For example, 51% of disabled Londoners cited overcrowding and cramped conditions as being a barrier to greater public transport use, compared to 47% of non-disabled people Transport for London (2019).	2a, 2b, 2c, 3	

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
Requiring a delivery schedule for phased developments including details on how accessibility will be enhanced is likely to positively impact people with disabilities, as it ensures access and inclusion issues are considered early on and supports implementation.	2a, 2b	
The guidance supports clearly legible and easily accessible entrances, which is likely to positively impact disabled people.	2a, 2b, 2c	
Encouraging noise analysis for mixed use developments is likely to positive impact disabled people, particularly Autistic people, by helping to minimise noise pollution.	2a, 2b	

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
Housing types  B – House: This type may be more appropriate for people with disabilities, including Autistic people, due to direct access from the street and access to private amenity space.	2a, 2b	
C – Cluster: Opportunities for communal outdoor space could benefit people with disabilities in terms of ease of access and facilitating social interactions.	2a, 2b, 2c, 3	
D – Terraces: Access to private gardens or courtyards and disabled persons parking could mean that this type is more suitable for disabled people.	2a, 2b	

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
E – Linear blocks: Lower floors may be more suitable for people with mobility impairments. Suitable for wheelchair accessible houses when planned with lift access. Ground floor more suitable for people with disabilities and Autistic people, if separate entrances can be provided.	2a, 2b	
G – Tower: Wheelchair accessible units suitable throughout due to lift access.	2a, 2b	

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
Module B – frontage line of new developments should not negatively impact street scene or create street canyons / result in poorer air quality. This could positively impact disabled people in terms of supporting accessible streets, and protect air quality, which some disabled groups, for example people with asthma, may be particularly affected by.	2a, 2b, 2c	
Negative  Car parking may be needed by people with disabilities and carers.	2a, 2b, 2c	Mixed-use development in v connected areas should be car-fre (with the exception disabled persons parking). Car par standards are specified within the London Plan white take into account needs of people v disabilities.

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
Large scale development could increase air pollution, which could negatively impact disabled people, who are particularly affected by poor air quality.	2a, 2b, 2c	In line with Lond Plan policies, Mo C requires that la scale redevelopm areas (i.e. Opport Areas) should consider how loc quality can be improved as part air quality positiv approach. All oth development sho be at least Air Qu Neutral. Air Qua Assessments sho be submitted with major development

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSEI (1, 2a, b or c, a 3)
Taller buildings supported near to each other could reduce opportunities for parking spaces either on-site or as bays on the street. This could negatively impact people with disabilities and carers, as they may find it harder to navigate streets and travel longer distances.	2a, 2b, 2c	Equality considerations a considered as pa scheme's development, for example through Inclusive Design Statements and Equality Impact Assessments. Cumulative equimpact assessment which may be conducted by lo authorities shout help to identity difficulties from multiple tall buit and their impact parking for disa people and care The London Pla includes parking requirements for schemes, which recognises the no of disabled peop

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
Developments with accessible housing may be built in flood risk areas. Disabled people may find it harder to evacuate.	2a, 2b	Building in flood areas is not promin the guidance. I development was being considered flood risk area, a flood risk assess would need to be conducted. If a scheme was permitted, it wouneed to have an evacuation strate which included the needs of disabled people. As highlighted in MC, where development in a at risk from flood is permitted, hom should make spawater and aim for development to be back from the back from the back of watercourses a be designed to incorporate flood resistance and

resistance and resilience measur

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
Minor schemes not needing infrastructure assessments could mean less consideration is given to the public realm including public transport, which would support disabled people.	2a, 2b, 2c, 3	Infrastructure is considered as par scheme being permitted. Infrastructure assessments are f be required more larger schemes w the impact on infrastructure is l to be greater.
Use of soft landscaping to minimise noise could introduce barriers to people with a visual impairment.	2a, 2b, 2c	Inclusive Design Statements shoul include access an inclusion considerations, w aim to minimise negative impacts disabled people.

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
Housing types with communal space may not be suitable for Autistic people.	2a, 2b	Alternative small housing types are provided (e.g. ho and terraces) whi may be suited to needs of Autistic people. Commun space may help to foster good relati between different groups. It also he to ensure that hot targets are met. Ground floor unimay have direct access to propertialso, although the are more likely to family sized, and would more likel benefit families a people with Autic

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
Housing types  C – Cluster: Stacked maisonettes – without level access, this housing type may be less suitable to people with disabilities, particularly if they cannot be adapted to make them accessible in the future, thus increasing the chance that a person developing a disability would need to move.	1, 2a, 2b	Stacked maisone are an efficient w providing larger homes and theref benefit families, whilst trying to deliver a greater number of homes overall. Module (highlights that development proposals should provide an appropriate range housing types and tenures so that, cumulatively, the provide opportun for people to rem within a commur over a longer per of their lives.

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSEI (1, 2a, b or c, a 3)
D – Terraces: Accommodation consists of a number of floors, which may be less suitable for some disabled and older people, given lift access is unlikely to be available in low rise terrace accommodation and compliance with Part M4(3) of the building regulations is inherently more challenging.	2a, 2b	Whilst this may be the most suit development for people with disabilities the trange of other delivery types is designed to mit. Terraces are alsefficient way of providing larger homes and so homeet the needs families. Access upper floors e.g stairlifts, could made possible through future adaptations to the property. Providing larger homes and so homeet the needs families. Access upper floors e.g stairlifts, could made possible through future adaptations to the property. Providing lift access could the scheme unvias the costs could too high to pass occupants.

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
If residential accommodation is moved to upper levels due to floor risk (as in D4.1 Foundry Mews example in Module D) this could affect accessibility, and therefore reduce choice for disabled people and may mean the property needs adaptations in the future to support disabled occupants.	2a, 2b	The guidance do not recommend building in flood areas. However, permitted follow full flood risk assessment, provresidential accommodation aupper levels coul help minimise negative impacts occupants. Modu specifies that development permitted in arearisk of flooding should be set back from the banks of watercourses and designed to incorporate flood resistance and resilience measure. Whilst accommodation aupper levels with lift access may nesuitable for peop with disabilities, adaptations could potentially be manke the propert accessible. Alternative housing the sales of for the sales of the sales o

types also offer l

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
E – Linear blocks Level access is not guaranteed, for example, for blocks that are 4 storeys or less. This may negatively impact people with disabilities as it may limit choice, as accommodation on upper floors may not be accessible. It may make it difficult for disabled people to occupy units on upper levels and/or to visit their neighbours on upper floors. It may make it harder for disabled people to visit people living on upper levels also - this could include friends, family and/or professionals from organisations. It may mean that a property cannot be adapted to meet the needs of people with a disability, and people may need to move if they develop a disability in the future.		Linear blocks of storeys or less he meet the needs of Londoners, particularly those are less likely to a disability, and scontribute to mee housing needs ovin London.  Alternative housi types are provide which include accessible accommodation. Ground floor uni would be accessialso, although the are more likely to family sized, and be less likely to benefit disabled people in smaller household sizes. inclusion of lift a could make the scheme unviable equality impacts the policy have b considered and at believed to be justified.

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
Maisonettes encouraged at ground floor to provide family units where required. However, this may negatively impact on the availability of accommodation for disabled people, who may require smaller household units.	2a, 2b	Alternative housing types are provided which include accessible housing and lift access. Ground floor unit would benefit disabled people with require family size housing.
Access to waste and recycling facilities for people with disabilities may be more difficult if the development doesn't have lift access.	2a, 2b	Development proposals should ensure that comm refuse, recycling food waste conta communal bin enclosures and restores are easily accessible to and usable by all resincluding childred disabled people, located on a hard level surface.

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, an 3)
		Module C specification that development proposals should demonstrate that achieve the highest standards of fire safety, identify unobstructed out space for fire appliances which also appropriate use as an evacual assembly point, a provide suitable convenient mean escape and an associated evacu strategy for all building users.
		In line with Lond Plan policy, sche are required to have evacuation strate which consider the needs of disabled people and how the would evacuate in event of a fire. Thighest standards fire safety should embedded in developments from the earliest possifications,

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
F - Villa blocks: Limited access to street frontages and open public spaces from dwellings could make this housing type less suitable for people with disabilities. Also, if upper levels are planned without lift access, this housing type may be less suitable for people with physical impairments and it may mean people are more likely to have to move if they develop a physical impairment.	2a, 2b	Occupants should have access to communal space /or private outsid space such as balconies. Under building regulatio M4(2) and M4(3) access to the frondoor must be step free.
If planned without lift access, access to waste and recycling facilities and means of evacuation may be more difficult.	2a, 2b	The guidance encourages developers to pla waste and recyclic considering the n of all occupants.

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
G – Tower: Autistic people may be negatively affected by noise from surrounding units.	2a, 2b	Evacuation mean all occupants sho be included in evacuation strate and Fire Stateme Development proposals should demonstrate that achieve the higher standards of fire safety, identify unobstructed outs space for fire appliances which also appropriate if use as an evacuat assembly point, a provide suitable a convenient mean escape and an associated evacuates strategy for all building users. Noise insulation included in stand which may mitig this.

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
Module B  Access may be more restricted for small sites, such as back land developments, depending on site specific considerations.	2a, 2b, 2c	Schemes need to M4(2) or M4(3) accessibility requirements. Outdoor space m however be more limited for small developments.
Developments that bookend a street or on a corner could have a frontage line that steps out in front of adjacent buildings, which could impact on accessibility for people with disabilities e.g. people with a visual impairment and wheelchair users.	2a, 2b, 2c	Accessibility is a aspect of good do The importance of designing for a diverse city is highlighted in MoC.
Distances between buildings can be reduced in certain circumstances, which could reduce space for disabled parking.	2a, 2b, 2c	Parking requiremapply, including disabled people. Different housing types are include which should mit any potential negimpact on disable people.

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
As suggested by the London Plan, conversions could be exempt from M4(2) (e.g. see example 4.1.1. or when houses are converted to maisonettes).	2a, 2b, 2c	Occupant could sensure accessibil requirements at a date
Gender reassignment	Positive No anticipated impacts	
	Negative No anticipated impacts	
Marriage and civil partnership	Positive No anticipated impacts	
	Negative No anticipated impacts	

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
Pregnancy and maternity	Positive  Emphasis on access to open space and reducing air pollution are likely to positively impact people who are pregnant and people with small children.	2a, 2b, 2c
	Research by <u>Transport for London (2019)</u> highlights that parents of young children face barriers to accessing public transport in London including overcrowding. Ensuring that the scale of development relates to existing or future infrastructure capacity will help to mitigate the impacts of a growing population on the public transport network. Managing future levels of crowding by improving transport capacity and connectivity should have a beneficial impact on those who share the protected characteristic of pregnancy and maternity by helping make public transport journeys more comfortable.	2a, 2b, 2c
	Housing types  B (House), C (Cluster) and D (Terraces) are likely to be suitable for people with small children due to access to private amenity or communal outdoor space or courtyards.	2b
	E – Linear blocks: Lower floors may be more suitable for people with small children due to ease of access (especially when planned with lifts).	2c

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
Negative  E – Linear blocks: The lack of private garden space could mean that this housing type is less suitable to people with children.	2b	Private outdoor s (e.g. balconies) a communal outdo space are still required. In exceptional cases where private our space cannot be provided, Module highlights that additional living space must be provided and justification.

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
Upper floors without lift access are likely to be less suitable to people with small children / prams.	2a, 2b, 2c	Developments ar expected to be planned for so th 90% meets M4(2 accessible and adaptable requirements and meets M4(3) wheelchair acces In unusual circumstances, in housing types of storeys or less, lit access may make scheme unviable felt that the provi of housing in the exceptional cases outweighs the negative impact oproviding lift acc Alternative housi types that meet the needs of people vare pregnant or oparental leave the level access.

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, an 3)
Race	Positive  Just under a third (30%) of Bangladeshi households and 15% of Black African households are classified as overcrowded, compared to only 2% of white British households (English Housing Survey 2018). Encouraging more housing delivery is of benefit to groups that are more likely to live in sub-standard or overcrowded housing.	2a, 2b
	Encouraging enhancements to walking areas, promoting cycling, access to open space and reducing air and noise pollution, improving connectivity and infrastructure provision are likely to positively impact on BAME groups. For example, research by Sport England (2020) shows lower participation in sport amongst BAME communities. Research by the Institute of Fiscal Studies (2020) 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. Enhancements to walking areas and improving connectivity and infrastructure provision could encourage active travel amongst BAME groups and positively impact on health.	2b, 2c
	Protecting heritage and cultural views could positively impact on the protected characteristic of race, by potentially ensuring that buildings of cultural significance to people from minority backgrounds are preserved.	2b, 2c, 3
	Providing affordable housing is a key consideration. Affordable housing should be outlined in delivery schedules, where delivery will be phased, which may help to secure affordable housing. This is likely to positively impact BAME groups who are more likely to be living in poverty.	2a, 2b

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
Family size and the needs of households including multiple generations are included in housing need assessments and London Plan policy H10, which focuses on housing size mix.	2b	
Housing types  B (House), C (Cluster) and D (Terraces) are likely to be suitable due to the provision of private amenity space, communal outdoor space and private gardens or courtyards.	2b	
Negative  E Villa blocks: Limited access to street frontages and open public spaces from dwellings could potentially negatively impact on families.	2b	

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
Extent to which the housing types meet the needs of Gypsies and Travellers.	2b	
Religion or belief	Positive  Buildings worthy of retention and their uses considered as part of site assessments, and heritage assets and protecting cultural views – this could include limit negative impacts on buildings used by people of particular religions or beliefs.	2a, 2b, 2c
	Housing types  B (House), C (Cluster) and D (Terraces) are likely to be suitable for people of particular religions or beliefs due to the provision of private amenity space, communal outdoor space and private gardens or courtyards. This could support people who have a religion or a belief to practice their religion or belief with others, for example through community gatherings. However, access to communal outdoor space and private outdoor space is a key consideration in Module C, across all housing types and other policies of the Plan encourage associated infrastructure development to meet wider community need in any case.	2b, 3
	Housing size is also considered through housing needs assessments and London Plan policy H10.	2b

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
Negative		
No anticipated impacts		
Sex	Positive  Evaluation of social infrastructure provision could positively impact women, as women tend to provide more informal care and rely more on social infrastructure provision.	2a, 2b, 2c
	Negative  E Villa blocks: Limited access to street frontages and open public spaces from dwellings may negatively impact people with small children. 90% of lone parents are women and so women may be more likely to be affected.	2a, 2b, 2c
	Without lift access people with prams could find it difficult to access.	2a, 2b, 2c
Sexual orientation	Positive  Assessing physical site characteristics includes identifying existing buildings worthy of retention and their uses and heritage assets, which could include significant buildings to LGBT+ communities.	2a, 2b, 2c, 3

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
Providing affordable housing is a key consideration. Affordable housing should be outlined in delivery schedules, where delivery will be phased, which may help to secure affordable housing. This is likely to positively impact LGBT young people who are more likely to be homeless than non-LGBT peers, due to increased likelihood of familial rejection.	2b	
Negative No anticipated impacts		
People on low incomes	Positive  Evaluating infrastructure capacity could improve energy efficiency and reduce fuel poverty.	2a

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
Providing affordable housing is a key consideration. Affordable housing should be outlined in delivery schedules, where delivery will be phased, which may help to secure affordable housing. This could particularly benefit BAME young LGBT people who are on low incomes, due to their increased risk of living in poverty and of being homeless.		
Improving connectivity to social and transport infrastructure can improve access to jobs and services, which may positively impact people on low incomes.		

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
Housing types  E (Linear blocks), F (Villa blocks) and in some cases G (Towers) offer opportunities to generate larger amounts of new affordable housing.		
Lower rise may also be more appropriate than towers in lower value locations to maximise the affordable housing offer.		

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including	Relevant PSED (1, 2a, b or c, an 3)
	engagement).	
Negative		Improving connectivity cou a contributing fa
Improving connectivity to social and transport infrastructure can impact on the value of land and depending on local circumstances this could inflate the cost of accommodation in some areas, particularly impacting private renters on lower incomes such as older retired people, some disabled people, or students.		in facilitating the delivery of more housing which contains a positive in if different types housing are proving a p
D – Terraces: Opportunities to generate affordable housing are reduced due to lower densities/ homes more likely to come forward through minor development.		Terraced housing more likely to me the needs of families including low in families. The Los Plan aims to ach 50% affordable housing which includes consider of different type housing.

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, an 3)
G –Tower: Taller buildings do not always result a higher percentage of affordable homes within a development, due to higher development costs. This may be more evident in lower value locations.		The London Plan aims to achieve 5 affordable housing which includes consideration of different types of housing. Taller buildings are still likely to provide higher number of affordable homes when compared to other housing types.

**Module C** 

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
Age	Positive  In line with London Plan policy SI1, development should be designed to reduce resident's exposure to air pollution, and to meet the needs of older people and families with young children.	2a, 2b, 2c
	All open space should be designed to be safe, accessible and inclusive, avoiding features which could enhance the fear of crime.	2b, 2c
	Shelter from the wind is likely to encourage social activity outside for children and older people.	2b, 2c
	For developments where 10 or more children and young people are expected to live, development proposals should make appropriate play and informal recreation provision in accordance with London Plan Policy S4. Children's play space should be designed to be stimulating and incorporate greenery, be overlooked to enable passive surveillance, be accessible to all tenures and be safely accessed from the street by children and young people independently. Play space should be carefully integrated into a scheme, which is likely to benefit children and young people.	2b
	Play space and communal areas should be located in areas with low air pollution. This should positively impact children and older people, who are more vulnerable to poor air quality.	2a, 2b

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
Where family units are prov ided on the upper floors, it is important to ensure appropriate private open space is provided with adequate outlook, orientation, and privacy. This is likely to positively impact on families with children.	2b	
Development proposals should demonstrate how they have been designed to meet the needs of a diverse population, including older people and families with young children in terms of site arrangements.	2b	

I <del></del>		
Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
Negative  Locating footpaths and cycleways next to trafficked streets could increase exposure young and older people's exposure to air pollution.	2a, 2b, 2c	The potential increased exposure poorer air quality argued to be justiful by increasing saft and security for pedestrians and cyclists. The ben of increased safe through surveillaris likely to positiful impact young and older people, red fear of crime and isolation. Air qualissessments are required as particularge development Reducing air politis a key feature of good quality designification. Furthermore, the Mayor's Health Sapproach and moshift to 80% of journeys to be made by walking, cyclication and public transproach and public transproach air qualistreet level.

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, an 3)
Provision of mobility scooter parking could help older people to maintain their independence and reduce social isolation.	2a, 2b, 2c	Disabled car park is included which should help to en that the needs of people with disabilities and care met. Mobility scooter storage cobe added to developments as of good quality design.
Disability	Positive  Development proposals should ensure access and inclusion in terms of inclusive design. They should demonstrate how they meet the needs of disabled people and the provision of accessible housing, entrances, disabled persons car parking and access to public transport networks. This is likely to positively impact disabled people in terms of increasing accessible housing, supporting access to facilities and services and reducing social isolation.	1, 2a, 2b, 2c
	Wheelchair user dwellings should meet the design requirements set out in Approved Document M volume 1, M4(3).	2a, 2b

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
Minimum space required for private outside space should meet building regulation accessibility standards (90% must be M4(2) accessible and adaptable and 10% must be M4(3) wheelchair accessible).	2b, 3	
Developments should minimise noise pollution to sound sensitive rooms and reduce resident's exposure to air pollution. This could support people with a disability, particularly Autistic people who are more likely to be sensitive to noise. It is also likely to reduce any negative impact of noise pollution on health.	2a, 2b, 2c	

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
Level changes on sites can be exploited while still ensuring that accessible housing is provided, and the highest standards of access and inclusion are met throughout the site.	2a, 2b, 2c	
All open space should be designed to be safe, accessible and inclusive, avoiding features which could enhance the fear of crime.	2a, 2b, 2c	

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
Creative approaches should be developed for play equipment which is accessible and inclusive for a range of users, including people with a range of impairments. This is likely to benefit people with disabilities, including children, including having a positive impact on health.	2a, 2b, 2c, 3	

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
Wheelchair user dwellings should generally be provided for all tenures of housing to maximise choice for wheelchair users. However, wheelchair users disproportionately require affordable housing and so at least 10% of affordable homes should comprise wheelchair user dwellings with a mix of dwellings with a mix of dwelling types to cater for a broad range of household sizes, ages of residents and varying family needs.	1, 2a, 2b	
All other dwellings to which Part M volume 1 of the Building Regulations apply should be 'accessible and adaptable'. The guidance reiterates the importance of accessible housing for disabled people.	1, 2a, 2b	

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
The approach to all entrances, should be level or gently sloping. All main entrances should be illuminated and have level access. This should benefit people with disabilities, including wheelchair users, people with sensory impairments, people living with dementia and people with invisible disabilities, as well as older people who are more likely to be at risk of falls.	2a, 2b, 2c	

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
Communal cycle stores should include accessible stand types and have step-free access. This is likely to positively impact people with disabilities by promoting access to cycling and encouraging exercise, which is likely to have positive health benefits.	2a, 2b	

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, an 3)
Shared approach routes, including the vertical circulation in the common parts of a block of flats, and communal areas between dwellings of different categories (i.e. M4 (2) and M4 (3)) should meet the highest numbered category of dwelling to ensure that people can visit their neighbours with ease. This is likely to positively impact disabled occupants in terms of reducing social isolation. It will also support people with disabilities to visit occupants, both friends and family of occupants and professionals from organisations.	2c, 3	

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, an 3)
Architects are encouraged to indicate in Design and Access Statements how dwelling types facilitate flexible use so that changes in circumstances and lifestyle can be accommodated without residents having to move to a new home. This is likely to positively impact residents with disabilities by increasing their choice of accommodation and supporting them to stay in their own homes for longer, should they wish to.	1, 2a, 2b, 2c, 3	

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
The guidance aims to reduce the negative impacts of noise, which could positively impact people with disabilities, including Autistic people. It could also help support people's mental health. Residents should be able to get to public transport, shop for food, relax in a park or have access to food and beverage facilities within comfortable walking distance of their home. This should positively benefit people with physical disabilities who may find it harder to travel further independently and without access to a car.	2a, 2b	

1		
Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, an 3)
Communal areas should be located in areas with low air pollution. This should positively impact people with disabilities, who are more vulnerable to poor air quality.	2a, 2b	
Overheating strategy should take into account external noise, which may positively impact disabled people by reducing noise disruption.	2a, 2b, 2c, 3	
Emergency means of escape should be designed to incorporate safe and dignified emergency evacuation for all building users.	2a, 2b, 2c, 3	

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, an 3)
Negative  Communal spaces and courtyards if not planned sensitively and with the input of people with lived experience of disabilities may not be accessible for disabled people.	2b	Inclusive design access statement should mitigate a negative impacts disabled people. Equality impact assessments for schemes should consider how to ensure communa spaces and court are planned to m the needs of peop with disabilities.

	Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
the air social design impac who m social	nunal entrances and m of encouraging interaction in may negatively t Autistic people, nay find these situations nfortable.	2a, 2b	Designing to encourage social interaction may positively impact residents, includi older people, who more likely to be affected by social isolation. It could help to foster good relations between groups with a protected characteristic, and doing so, reduce prejudices. Private entrances are provided for som types of accommodation, ensuring that the needs of Autistic people are met.
scoote	duce social	2a, 2b, 2c, 3	Mobility scooter parking could still included within developments. Disabled car park must be consider

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSEL (1, 2a, b or c, an 3)
Open-plan living, dining and kitchen spaces are often considered to be the market preference, however with more people working from home due to Covid-19, families and people with disabilities may find it hard to work from home successfully in open-plan environments. but there are times when it is preferable to achieve a degree of separation, at least between the living space and the work area of the kitchen.		The guidance highlights that a times it may be preferable to ach a degree of separation, at lead between the living space and the wearea of the kitch. The guidance also notes that homes which living, directly and kitchen fundare combined in single space can it difficult for farmembers to pure different activiti the same time we disturbing each activities are time we disturbed when the an insufficient and external wall with windows to allow sub-division.

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
Gender reassignment	Positive  All open space should be designed to be safe, accessible and inclusive, avoiding features which could order to feature of arims.	2a, 2b, 2c, 3
	avoiding features which could enhance the fear of crime.  Negative  No anticipated impacts	
Marriage and civil partnership	Positive No anticipated impacts	
	Negative No anticipated impacts	
Pregnancy and maternity	Positive  Development proposals should demonstrate how they have been designed to meet the needs of families with young children and access to outdoor space and play space is a key consideration. For developments where 10 or more children and young people are expected to live, development proposals should make appropriate play and informal recreation provision in accordance with London Plan Policy S4. This is likely to positively impact parents of small children, including positively impacting on physical and mental health.	2b, 2c, 3

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
Where family units are provided on the upper floors, it is important to ensure appropriate private open space is provided with adequate outlook, orientation, and privacy. This is likely to positively impact on families with children.	2a, 2b	
Negative No anticipated impacts		
	Positive  Development proposals should demonstrate how they have been designed to meet the needs of families with young children.	2b, 2c, 3
II I	All open space should be designed to be safe, accessible and inclusive, avoiding features which could enhance the fear of crime.	2a, 2b
	Provision of communal spaces, where possible, that are of value to the existing or future community such as well-located open green spaces or community rooms that enable a variety of activities, can help to foster active participation in social life.	2c, 3

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
Development proposals should demonstrate that meaningful engagement has taken place with existing communities from the early design stage in order to help define specific community needs and aid with any integration of new communities.	2b, 2c, 3	
Fire Statements include ensuring that people who speak little or no English are planned for in terms of evacuation.		
Homes for larger families should cater for activities involving family members and visitors and should have sufficient social spaces e.g. homes with 3+ bedrooms should have two social spaces, both with external windows.	2a, 2b	

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
Where housing is being designed to suit specific cultural requirements, designers might (depending on said cultural requirements) find a preference for the kitchen to be separated from the living and dining spaces. Different methods of cooking may require larger kitchens with additional ventilation or features.	2a, 2b	
Narrow living rooms are discouraged. It is recommended that the width of the principal sitting space is at least 3.2m for dwellings with four or more occupants, and at least 2.8m in dwellings for those with fewer than four occupants.	2a, 2b, 2c, 3	

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
Negative Housing types without lift access (e.g. linear blocks with 4 storey's or less) may be difficult to access for families with small children	2b, 2c	It is expected that new build developments with include level account meet targets 90% accessible and adaptable (M4(2) 10% wheelchair accessible (M4(3) exceptional and unusual cases, developments that 4 storeys or less of stacked maisonet or buildings above shops may be exceptional and unusual cases, developments that 4 storeys or less of stacked maisonet or buildings above shops may be exceptional developments that accessible housing types enthat accessible housing is provided building in exceptional circumstances will be access would still benefit non-disabled people, including other protected groups can help to ensuraffordable housing provided benefitillow income groups.

low income grou

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
Religion or belief	Positive  All open space should be designed to be safe, accessible and inclusive, avoiding features which could enhance the fear of crime.	
	Provision of communal spaces, where possible, that are of value to the existing or future community such as well-located open green spaces or community rooms that enable a variety of activities, can help to foster active participation in social life.	
	Where housing is being designed to suit specific cultural requirements, designers might (depending on said cultural requirements) find a preference for the kitchen to be separated from the living and dining spaces. Different methods of cooking may require larger kitchens with additional ventilation or features.	
	Narrow living rooms are discouraged. It is recommended that the width of the principal sitting space is at least 3.2m for dwellings with four or more occupants, and at least 2.8m in dwellings for those with fewer than four occupants.	

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
Negative  Housing types without lift access (e.g. linear blocks with 4 storey's or less) may be difficult to access for families with small children, which may affect people of particular religions more as research indicates that they may be more likely to have higher numbers of dependent children.		It is expected that new build developments with include level account meet targets 90% accessible and adaptable (M4(2) 10% wheelchair accessible (M4(3) exceptional and unusual cases, developments that 4 storeys or less of stacked maisonet or buildings above shops may be exceptional and unusual cases, developments that 4 storeys or less of stacked maisonet or buildings above shops may be exceptional level access would mat the scheme unvia providing alternate housing types enthat accessible housing is provided building in exceptional circumstances will benefit non-disabled people, including other protected groups can help to ensure affordable housing provided benefitilow income groups.

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
Sex	Positive  All open space should be designed to be safe, accessible and inclusive, avoiding features which could enhance the fear of crime.	2a, 2b, 2c, 3
	Negative  Housing types without lift access (e.g. linear blocks with 4 storey's or less) may be difficult to access for families with small children.	2b, 2c
Sexual orientation	Positive  All open space should be designed to be safe, accessible and inclusive, avoiding features which could enhance the fear of crime.	2a, 2b, 2c, 3
	Negative No anticipated impacts	

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
People on low incomes	Positive  Development proposals should demonstrate that housing of different types	1, 2a, 2b, 3
	and tenures have been fully integrated, and that the quality of architecture and materials is consistent across all tenures. Affordable homes should have the same external appearance as private market homes.	1, 20, 20, 3
	In some higher-density schemes, separate provision of entrance and circulation spaces for different tenures may be permitted to support the viability of the scheme. However, the size and legibility of all residential entrances should be designed such that equal weight is given to the quality and accessibility of residential entrance lobbies and their visual presence from the public realm.	1, 2a, 2b, 3
	Residents of all homes in a residential tower should have access to all communal amenity and play space that serves the building.	1, 2a, 2b, 2c, 3
	There should be equitable access to on-site cycle parking and any car parking spaces for different tenures based on the proportion of affordable homes within the scheme.	1, 2a, 2b, 2c, 3
	Developments such as gated communities that might compromise objectives to secure a more socially inclusive city should be resisted.	2a, 2b, 3

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
This guidance requires that all dwellings should be provided with adequate private outside space in the form of a garden, terrace, balcony or glazed winter garden. This applies to all forms of tenure, including affordable rent. This ensure that low income residents have access to private outside space, which is likely to positive impact on their health.	1, 2a, 2b, 3	

Group	Potential impact description  What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, ar 3)
Costed plans should set out how management arrangements will work in mixed-tenure schemes, and how residents' views will be taken into account in delivering affordable services. This should help to ensure that the needs of low-income residents are taken into account.	2a, 2b, 2c	
Negative No anticipated impacts.		

# Overview of equality impacts

Using your findings from the table above, summarise the impacts for each group in the table below using the scoring listed above.

Age Disability	Gender reassignment	and civil		Race	Religion and belief		Sexual Orientation	People on low incomes
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Module A and B	+1	0	No anticipated impacts	+1	+1	+1	+1	+2	+2
Module C	+1	+1	No anticipated impacts	+2	+2	+2	+1	+2	+2

# Amendments to the guidance

(only for review to the EqIA in the future)

Change	Reason for change
What changes have you made to the guidance as a result of this EqIA?	Why have these changes been made?

# Recommendation

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

Outcome Number	Description	Mark with an X
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.	x
Outcome Two	Adjustments to the guidance are required to remove barriers identified by the EqIA or better advance equality.	
Outcome Three	Justify and continue with the guidance despite having identified some potential for negative impacts or missed opportunities to advance equality.	
Outcome Four	Stop, rethink or abandon when the EqIA shows actual or potential unlawful discrimination	

# **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.

# 1.2 Appendix A: Evidence Reference and Content

This section sets out key evidence by protected group relating to the guidance. Additional evidence is set out in draft London Plan IIA 2017.

### **Evidence**

Age

London boroughs have a relatively young population. The median age of Londoners was 35, compared to a national average of 40.

32% of Londoners are under the age of 25 and 11% are aged 65 or over (ONS 2011).

Older Londoners (aged 65 or over) are more likely to be women (London Travel Demand Survey 2016/17). The GLA projects that, in 2019, over a fifth of London's population are under 16 (1.9 million). Over two-thirds, or 6.2 million, are working age (aged between 16 and 64), and less than one in eight are 65 or over (1.1 million). 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 (GLA City Intelligence Unit 2018).

**Disability** 

16% of working age Londoners aged 16 to 64 were disabled between 2015 to 2017 (ONS 2017). This is slightly younger than the national average for Great Britain of 20%, reflecting London's younger population.

There are 1.3 million 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 (ONS 2019).

14% of Londoners consider themselves to have a disability that effects their day-to-day activities 'a lot' or 'a little' (ONS 2011).

Disability is closely related to age: 13% of the working age population are disabled versus 28% of people aged 65 or over (ONS 2019).

56% of disabled Londoners are women, compared with 50% of non-disabled Londoners Disabled people are also are more likely to be on a low income (61% 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% of non-disabled Londoners (London Travel Demand Survey 2016/17)

84% of disabled Londoners report that their disability limits their ability to travel.

55% of disabled Londoners state that their disability affects their mobility, 22% have a serious long-term illness and 10% 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).

#### EHRC (2018) The housing experiences of disabled people in Britain

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.

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 (2016) No Place Like an Accessible Home Quality of life and opportunity for disabled people with accessible housing needs

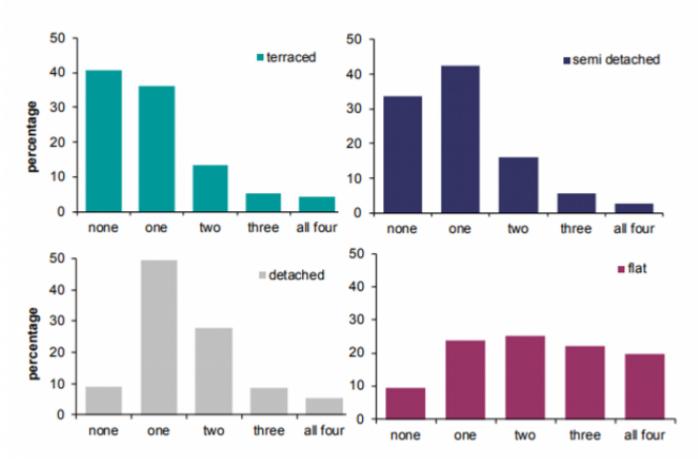
At least 1.8 million households (one in twelve of all households) in England have an identified need for accessible housing, of whom 580,000 (one third) are working age.

0.7 million households (around one in thirty of all households) have more significant needs corresponding roughly to Building Regs 2/3.

Real need estimated to be higher, as English Housing Survey does not include figures for disabled children.

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

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

Figure 1.1

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

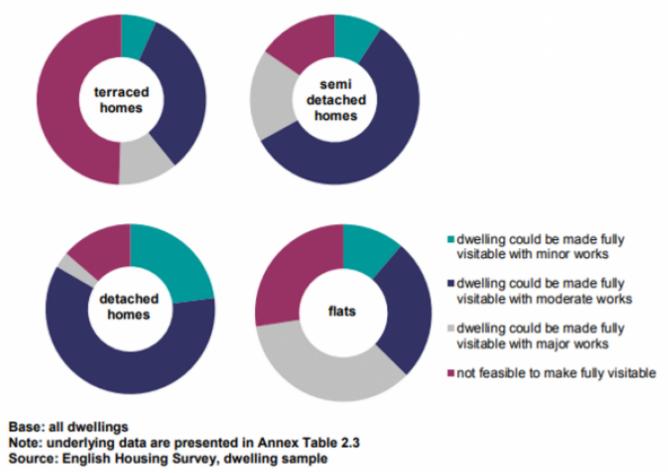


Figure 1.2

Improving the accessibility of terraced homes would be the most challenging, with half (50%) of these homes simply not feasible to make fully visitable 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% of flats were not feasible to make visitable. Over half of semi-detached (58%) and detached homes (60%) could be made fully visitable through a moderate level of work but 15% and 14% respectively were not feasible to make them to compliant.

#### Gender reassignment

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% of the UK population identify as trans (EHRC, 2012). The Government Equalities Office tentatively estimated that around 0.3-0.8% of the UK population in 2018 were transgender (approximately 200 000 to 500 000 people).

#### Marriage of Civil Partnership

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

Pregnancy and maternity

The total fertility rate (number of children a woman with average fertility would have) was 1.70 in London, compared to a national figure of 1.76 (ONS 2017). In London the general fertility rate (births per 1000 women aged 15-44) was 62.9%, compared to 61% for England and Wales. The crude birth rate (births per 1000 population) was 14.3, compared to 11.6 for England and Wales.

58% of live births were born to mothers who were born outside the UK, compared to a national average of 28% (ONS, 2017).

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 4 storeys or less without lift access, may be more difficult to access.

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

Race

#### Race

Black, Asian and minority ethnic (BAME) Londoners make up 40% of London's population (ONS 2011). BAME Londoners are more likely to be younger and on lower incomes. For instance, 44% of people on low incomes in London are also BAME (London Travel Demand Survey 2016/17). Cost of travel is more often mentioned as a barrier to public transport use by BAME Londoners (51%). BAME Londoners are more likely to live in households with an average annual income below £20,000 (33% BAME compared with 25% white) [11].

Most Londoners have English as their main language (78%). However, 4% do not speak English well (ONS 2011).

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

Research by the Institute of Fiscal Studies 2020 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.

Furthermore, just under a third of Bangladeshi households are classified as overcrowded, as are 15% of black African households, according to the English Housing Survey (2018). Only 2% of white British households are classified as overcrowded.

18.9% of Black households were 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% (Census 2011).

Religion or belief

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 (58% to 48%). There has also been an increase in the proportion who do not identify with any religion (16% to 21%).

Religion varies considerably between ethnic groups:

While 28% of white and 27% of mixed Londoners report they have no religion, only 7% of Black and 8% of Asian Londoners report this.

More than half of Black (68%) and white (57%) Londoners 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% of Asian Londoners and 50% of Londoners selecting 'other' ethnic group are Muslims).

Research by the Equality and Human Rights Commission highlights that in England, there was a higher percentage of Christians who were recorded as overweight or obese (66.6%), compared with people with no religion (55%). The percentage of religious minorities recorded as overweight or obese was 56.4% in 2012.

Half of Londoners are women (51%) (ONS 2011).

In 2019, the GLA projected that 4.55 million Londoners were female and 4.55 million were male (GLA Intelligence Unit 2018). Women face particular issues around gender-based violence and low pay. As the majority of lone parents (90%) are women, recent reforms to welfare that have affected lone parents have had a disproportionate impact on women. 18.9% of Black households and 16.2% of Mixed households were 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% followed by White households at 6.7% (Census 2011).

Women sharing other characteristics women 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 (EHRC 2018).

Londoners living in a lower income household (less than £20,000 per year) are more likely to be women (London Travel Demand Survey 2016/17).

Women in London are more likely to be older (ONS 2011).

Men are more likely than women to be working full-time.

Women 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.

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% of Londoners identified as Lesbian, Gay, Bisexual or 'Other' compared to the national rate of 3.3%. Figures from the 2017 Annual Population Survey provide lower estimates for London and England (3.2% and 2.6%).

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% of the youth homeless population.

Gaps in Evidence

No gaps have been identified at this stage. Additional data that could inform the EqIA may include the number of disabled people by household size, for example that held by Local Planning Authorities in relation to social housing.

# 1.3 Appendix B: Engagement summary

## Summary of protected groups engaged

List the protected groups that have been engaged through the informal engagement - Please refer to the engagement table 2 below.

If groups are identified in the assessment who have not been previously engaged, briefly set out how they will be targeted through the formal engagement (i.e. either a specific focus group meeting or invitation to community webinar event) and timeframes.

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 have provided a platform for borough officers to offer their expertise.

Future engagement:

Engagement with community groups as part of the formal consultation on the guidance.

Voy findings

## **Engagement record**

Event

Specific groups

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

details	represented	Key findings
Aug 2018	Young	GLA workshop facilitated by Mae Architects and the Stephen Laurence Charitable Trust engaging young Londoners on the key quality of life indicators and priorities from their perspective.

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