

# Equality Impact Assessment of Industrial Land and Uses London Plan Guidance – Draft December 2023

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# 1 Overview

**London Plan Guidance (LPG) name: Industrial Land and Uses LPG**

**Stage: Consultation**

**Date of Equality Impact Assessment (EqIA): Last updated December 2023**

**Brief outline of the guidance:**

The Industrial Land and Uses LPG sets out to assist local planning authorities (LPAs) in preparing the industrial element of the evidence supporting the Local Plan. It also provides guidance for LPAs and developers when developing or assessing masterplans and planning applications involving industrial uses, or located on designated industrial land. The draft LPG does this by: providing clear definitions for terms relating to industrial development; providing clarity and consistency for assessing the sufficient supply of industrial capacity to meet demand; and setting out considerations for strategic industrial intensification and co-location opportunities.

**Who is the guidance aimed at?**

The primary audience is made up of: LPAs and others that support the production of Local Plan evidence; developers and designers involved in bringing forward proposals for industrial masterplans and developments.

**What are the key issues to be aware of?**

The GLA's [London Industrial Land Supply](#) study shows that 343,200 (7 per cent) of all employment in London was in industrial activities in 2019.

The study also shows that London lost 18 per cent of its industrial land between 2001 and 2020; however, in recent years demand has increased due to structural changes in the economy – such as the rise in online retail, and growth in the population and the economy. The demand for industrial land has resulted in the land vacancy rate halving to 6 per cent over the decade to 2020, with the rate close to 0 per cent in some areas. Modern stacked intensification and co-location industrial developments are an emerging typology in London. Whilst there are numerous planning permissions for stacked co-location schemes, only a limited number have been built.

The draft Industrial Land and Uses LPG sets out factors to consider when developing evidence to inform Local Plans and policy development upfront, as opposed to at Regulation 18 and 19 stages when the Mayor provides comments on the general conformity of the Local Plan with the London Plan. While the LPG may not significantly change the overall outcome, it should save time and resources for the GLA and LPAs.

The guidance provided on Use Class E is likely to have a limited impact on the overall number of jobs – but should help ensure the appropriate mix of industrial jobs to underpin the functioning of London.

Whilst the London Plan has policies on design, transport and the environment, the advice in this guidance is specific to, and will therefore influence the outcome of, industrial developments.

The guidance also helps to identify areas suitable for industrial intensification and co-location typologies. It sets out a masterplanning process to ensure they are only prepared where appropriate locational and operational conditions for businesses and their employees can be provided, as well as appropriate living conditions for residents.

**Which of the Public Sector Equality Duty (PSED) aims,<sup>1</sup> considered in turn, are relevant to the guidance and the impacts identified?**

1. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by or under the Equality Act 2010 (the Act).

No

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

Yes

3. Foster good relations between people who share a protected characteristic and those who do not.

No

## 2 Assessment

### 2.1 Summary assessment of LPG

This section lists aspects of the LPG that might impact those with protected characteristics or other identified groups.<sup>2</sup>

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<sup>1</sup> Please see Appendix C for legal context / background information.

<sup>2</sup> Including those that share one of the nine protected characteristics in the Equality Act 2010 (please see Appendix C for definitions), and other groups that are likely to be affected by equalities issues, such as people on low incomes; carers; refugees and asylum seekers; looked-after children; care leavers; UK Armed Forces Veterans; homeless people and rough-sleepers; and ex-offenders/people with experience of the criminal justice system.

**Table 1: Summary assessment of LPG**

<b>LPG key aspects, chapter headings, theme etc</b>	<b>Groups that could be impacted</b>
<p>Better <b>working conditions</b>, through early consideration, to improve urban/building design; public/amenity space; environmental conditions; and operational safety benefitting staff, customers and visitors of industrial premises including facilities for night workers (sections 4 and 5 of the LPG)</p>	<p>Positive impacts on all protected groups, if they work on industrial premises; the proportion of employees in industrial occupations is relatively high for people from Black, Asian and Minority Ethnic backgrounds, and young people compared to other groups of Londoners.</p> <p>Positive impacts on people experiencing more fear and discomfort relating to violence and harassment due to their protected characteristics or vulnerabilities such as disabled people; women; people undergoing gender reassignment; people who are lesbian, gay, bisexual, transgender, queer, and more (LGBTQ+); and people from Black, Asian and Minority Ethnic backgrounds.</p>
<p>Better spatial <b>living conditions</b> for Londoners living near industrial premises, by early consideration to improve their urban/building design; public/amenity space; and environmental conditions (sections 4 and 5 of the LPG)</p>	<p>Positive impacts on all protected groups if they live near industrial premises. That is more likely for people on low incomes; young people; disabled people; and people from Black, Asian and Minority Ethnic backgrounds due to a limited choice of places to live compared to other groups of Londoners.</p>
<p>Suitable locations for industrial <b>intensification and co-location</b> that can provide appropriate working and living conditions (section 4 of the LPG)</p>	<p>Positive impacts on all protected groups, if they work or live in industrial intensification or co-location schemes.</p>
<p>Early consideration of improving <b>access</b> routes and points to industrial premises for day and night use, benefitting staff, customers and visitors; and fully segregated residential access in co-location schemes (section 5 of the LPG).</p>	<p>Positive impacts on all protected groups. That is more likely for disabled people; older people; people with caring responsibilities; pregnant women; and women with young children due to their mobility issues compared to other groups of Londoners.</p> <p>Positive impacts on all protected groups, if they cycle, which may be more likely for young people.</p>

It should be noted that the general policy impacts have already been assessed as part of preparing the London Plan. This LPG is providing further detail on how the policies should be implemented, and is therefore amplifying the effects. This means that the potential positive effects, in terms of additional employment for example through industrial intensification, and the potential negative effects through possible increased vehicle movements are not included in this assessment.

## 2.2 Detailed equality impacts

This section sets out the positive and negative impacts of the implementation of this guidance for specified groups (including those that share a protected characteristic).

Evidence (including engagement)<sup>3</sup> is cited, where possible, for impacts. 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, consideration is given to how these could be maximised.

The impacts are scored as follows:

- strong positive
- positive
- neutral
- negative
- strong negative
- mixed (both positive and negative impacts identified) or uncertain.

Further explanation of the PSED aims and definitions of protected characteristics can be found in Appendix C.

### Age

#### Potential positive impacts and scores

London has a relatively young population, but many young Londoners disproportionately struggle with high housing costs or unemployment. This may limit their choice of housing, as it has to be affordable; this potentially increases the chance that this could be near an industrial area. The selected locations near Strategic Industrial Locations (SILs), for example, have a higher share of young people and children.

For young and older Londoners living near industrial areas, the draft LPG is likely to contribute to better **living conditions**. People specifically working or living in areas undergoing industrial intensification or co-location are also likely to benefit from better working and living conditions. (Positive)

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<sup>3</sup> See Appendix A and B

In terms of employment, a relatively high proportion of young Londoners aged 16-24 work in retail, wholesale or vehicles repair. However, retail activities are unlikely to take place on industrial land. A relatively high proportion of older Londoners aged 50+ work in transport and storage, most of which is likely to take place on industrial land. The exception to this is passenger transport, which is also included but less likely to take place on industrial land.

For young and older Londoners working in industrial areas, the application of the draft LPG is likely to contribute to better **working conditions** through early consideration to improve urban/building design; public/amenity space; environmental conditions; and operational safety of the industrial premises, including facilities for night workers. (Positive)

Those particularly likely to benefit from early consideration of improving **access** routes and points to industrial premises for day and night use are: older people with mobility issues; children/babies in buggies; and young people cycling. The requirement to consider, at an early stage, fully segregated residential access in co-location schemes is especially likely to increase the safety of children, who tend to be less aware of traffic dangers. (Positive)

### Potential neutral impacts and scores

None identified

### Potential negative impacts, mitigations or objective justification and scores

None identified

### Relevant PSED aim(s)<sup>4</sup>

- 2 (a)
- 2 (b)
- 2 (c)

## Disability

### Potential positive impacts and scores

Disabled people may experience harassment and other threats in public spaces.

The LPG encourages **activation and surveillance** of routes and other public spaces in areas that traditionally may not have active frontages. This should help address vulnerability; and help disabled people feel more safe and secure in public spaces. (Positive)

Disabled people are more likely to be unemployed than people who are not disabled. Families with a disabled person are more likely to live in poverty than families where no one is disabled. A higher proportion of disabled people live in the social rented sector. All this may limit their choice of housing, as it has to be affordable; this potentially increases the chance that this could be near an industrial area.

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<sup>4</sup> See Appendix C for the PSED aims.

For disabled people living near industrial areas, the draft LPG is likely to contribute to better **living conditions**. Disabled people specifically living in areas undergoing industrial intensification or co-location are also likely to benefit from better conditions. (Positive)

For disabled people working in or visiting industrial premises, the early consideration of improving **access** routes and points for day and night use is likely to be beneficial. The requirement to consider, at an early stage, fully segregated residential access in co-location schemes is also likely to be beneficial and increase their safety. (Positive)

The emphasis on ensuring that site layout and design enable the 24-hour operation of the industrial element of a co-location scheme should ensure **noise considerations** are addressed. This will help to provide a more suitable environment for people with mental health conditions and neurodiversity. (Positive)

### Potential negative impacts, mitigations or objective justification and scores

No impacts identified.

### Relevant PSED aim(s)

- 1
- 2 (a)
- 2 (b)
- 2 (c)

## Gender reassignment

### Potential positive impacts and scores

People undergoing gender reassignment may experience harassment in public spaces; many of those crimes remain unreported. Trans people in particular are more likely to experience threats of physical or sexual harassment or violence.

The LPG encourages **activation and surveillance** of routes and other public spaces in areas that traditionally may not have active frontages. This should help address vulnerability, and help people feel more safe and secure in public spaces. (Positive)

### Potential negative impacts, mitigations or objective justification and scores

No impacts identified.

### Relevant PSED aim(s)

- 1
- 2 (a)
- 2 (b)
- 2 (c)

## Marriage and civil partnership

### Potential positive impacts and scores

A comparatively high proportion of people who are married or in a registered civil partnership are employed in manufacturing, construction or utilities. However, no impacts of the LPG have been identified.

### Potential negative impacts, mitigations or objective justification and scores

No impacts identified.

### Relevant PSED aim(s)

N/A

## Pregnancy and maternity

### Potential positive impacts and scores

For pregnant women, who are less mobile, and women with young children, the draft LPG is likely to contribute to better living conditions, if these women live near industrial premises. If they are specifically living in areas undergoing industrial intensification or co-location, they are also likely to benefit from better conditions. (Positive)

For pregnant women and women with young children visiting industrial premises, the early consideration of improving **access** routes and points for day and night use is likely to be beneficial. The requirement to consider, at an early stage, fully segregated residential access in co-location schemes is also likely to be beneficial and increase their safety, as well as that of their children, who tend to be less aware of traffic dangers. (Positive)

### Potential negative impacts, mitigations or objective justification and scores

No impacts identified.

### Relevant PSED aim(s)

- 2 (a)
- 2 (b)
- 2 (c)

## Race

### Potential positive impacts and scores

People from Black, Asian and Minority Ethnic backgrounds may experience harassment in public spaces.

The LPG also encourages **activation and surveillance** of routes and other public spaces in areas that traditionally may not have active frontages which could help people from



Black, Asian and Minority Ethnic backgrounds feel more safe and secure in public spaces. (Positive)

Many people from Black, Asian and Minority Ethnic backgrounds live on comparatively low incomes, and their employment rate is relatively low, particularly among young people. This may limit their choice of housing, as it may have to be affordable; this potentially increases the chance that this could be near an industrial area. The immediate hinterlands around selected sample SILs have higher percentages of residents from Black, Asian and Minority Ethnic groups compared to London as a whole.

For people from Black, Asian and Minority Ethnic backgrounds who live near industrial areas, the draft LPG is likely to contribute to better **living conditions**. People specifically working or living in areas undergoing industrial intensification or co-location are also likely to benefit from to better working and living conditions. (Positive)

Employment of people from Black, Asian and Minority Ethnic backgrounds in wholesale, retail, vehicle repair, transport and storage is significantly higher than the respective averages across all occupations (although retail and passenger transport activities are unlikely to take place on industrial land).

For people from Black, Asian and Minority Ethnic backgrounds who work in industrial areas, the application of the draft LPG is likely to contribute to better **working conditions** through early consideration to improve urban/building design; public/amenity space; environmental conditions; and operational safety of the industrial premises including facilities for night workers. (Positive)

### Potential negative impacts, mitigations or objective justification and scores

No impacts identified.

### Relevant PSED aim(s)

- 2 (a)
- 2 (b)
- 2 (c)

### Religion or belief

#### Potential positive impacts and scores

The shares of Muslim and Hindu employees in wholesale, retail, vehicle repair, transport and storage are significantly higher than the respective averages across all occupations (although retail and passenger transport activities are unlikely to take place on industrial land).

To the extent that households holding particular religious beliefs belong disproportionately to Black, Asian and Minority Ethnic groups, this means they are likely to experience similar impacts to those identified for Black, Asian and Minority Ethnic backgrounds above. (Positive)

## Potential negative impacts, mitigations or objective justification and scores

No impacts identified.

### Relevant PSED aim(s)

- 2 (a)
- 2 (b)
- 2 (c)

## Sex

### Potential positive impacts and scores

Women may experience harassment and other threats in public spaces.

The LPG encourages **activation and surveillance** of routes and other public spaces in areas that traditionally may not have active frontages. This should help people feel more safe and secure in public spaces. (Positive)

Female employment in industrial sectors is generally disproportionately low, but it is growing in, for example, the logistics sector. In sectors such as manufacturing, wholesale, retail and vehicle repair, employment is already relatively high compared to that across all occupations (although retail is unlikely to take place on industrial land).

For female employees who work in industrial areas, the application of the draft LPG is likely to contribute to better **working conditions** through early consideration to improve urban/building design; public/amenity space; environmental conditions; and operational safety of the industrial premises, including facilities for night workers. (Positive)

### Potential negative impacts, mitigations or objective justification and scores

No impacts identified.

### Relevant PSED aim(s)

- 2 (a)
- 2 (b)
- 2 (c)

## Sexual orientation

### Potential positive impacts and scores

People who are LGBTQ+ may experience harassment in public spaces.

The LPG encourages **activation and surveillance** of routes and other public spaces in areas that traditionally may not have active frontages. This should help people feel more safe and secure in public spaces. (Positive)

### Potential negative impacts, mitigations or objective justification and scores

No impacts identified.

#### Relevant PSED aim(s)

- 1
- 2 (a)
- 2 (b)
- 2 (c)

### People on low incomes<sup>5</sup>

#### Potential positive impacts and scores

London has the highest poverty rate in the UK, and the proportion of Londoners financially struggling is increasing. For people on low incomes the choice of housing is likely to be limited, as it may have to be affordable. This potentially increases the chance that this could be near an industrial area. The immediate hinterlands around the majority of selected sample SILs had higher percentages of people who are not economically active compared to London as a whole.

For people on low or no income living near industrial areas, the draft LPG is likely to contribute to better **living conditions**. People specifically working or living in areas undergoing industrial intensification or co-location are also likely to benefit from to better working and living conditions. (Positive)

#### Potential negative impacts, mitigations or objective justification and scores

No impacts identified.

#### Relevant PSED aim(s)

- 2(a)
- 2 (c)

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<sup>5</sup> The socio-economic duty was introduced into legislation as Section 1 of the Act, with the aim of ensuring that public bodies had to take socio-economic disadvantage into account when making strategic decisions. However, following a change in government in 2010, the new coalition government decided not to implement the socio-economic duty. Though not a protected characteristic in the Act, the GLA recognises that socio-economic disadvantage is a significant contributor to inequality across London and therefore considers equality impacts on people on low incomes as part of its decision making.

## Other groups such as carers; refugees and asylum seekers; looked-after children; care leavers; UK Armed Forces Veterans; homeless people and rough sleepers; and ex-offenders/people with experience of the criminal justice system

### Potential positive impacts and scores

Most of these other groups are vulnerable and people may experience harassment in public spaces.

The LPG encourages **activation and surveillance** of routes and other public spaces in areas that traditionally may not have active frontages. This should help people feel more safe and secure in public spaces. (Positive)

Most of these groups, including carers and looked-after children, also suffer financial hardship, which severely limits the choice of their place to live, as it has to be affordable. This potentially increases the chance that this could be near an industrial area.

For those living near industrial areas, the draft LPG is likely to contribute to better **living conditions**. People specifically living in areas undergoing industrial intensification or co-location are also likely to benefit from better conditions. (Positive)

Specifically for people with caring responsibilities visiting industrial premises, the early consideration of improving **access** routes and points is likely to be beneficial. The requirement to consider, at an early stage, fully segregated residential access in co-location schemes is also likely to be beneficial and may increase their safety. (Positive)

### Potential negative impacts, mitigations or objective justification and scores

No impacts identified.

### Relevant PSED aim(s)

- 2 (a)
- 2 (c)

## 2.3 Overview of equality impacts

**Table 2: overview of equality impacts**

Protected characteristic/ group	Strongly positive impacts	Positive impacts	Neutral impacts	Negative impacts	Strong negative impacts	Mixed or uncertain impacts
Age	-	Yes	-	-	-	-
Disability	-	Yes	-	-	-	-

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Protected characteristic/ group	Strongly positive impacts	Positive impacts	Neutral impacts	Negative impacts	Strong negative impacts	Mixed or uncertain impacts
Gender reassignment	-	Yes	-	-	-	-
Marriage and civil partnership	-	-	-	-	-	-
Pregnancy and maternity	-	Yes	-	-	-	-
Race	-	Yes	-	-	-	-
Religion and belief	-	Yes	-	-	-	-
Sex	-	Yes	-	-	-	-
Sexual orientation	-	Yes	-	-	-	-
People on low incomes	-	Yes	-	-	-	-
Other groups	-	Yes	-	-	-	-

## 2.4 Cumulative impacts

The draft LPG is likely to have positive impacts, in particular, cumulatively between young Londoners; those from Black, Asian and Minority Ethnic backgrounds; and low-income groups.

## 3 Amendments

No changes made to the draft LPG due to overall positive impacts.

## 4 Recommendation

Based on the assessment, this table indicates the recommended course of action to decision-makers with regard to reviewing the guidance.

**Table 3: Recommendation**

Description	Recommended
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
Adjustments to the guidance are required to remove adverse impacts identified by the EqIA or better advance equality. [Include here how you have adapted plans to mitigate adverse impacts]	-
Justify adverse impacts or missed opportunities to advance equality and continue with the guidance. [Add justification explanation. Include here: reasons why adverse impacts cannot be mitigated and justification, how you have adapted plans to mitigate adverse impacts, alternative options looked at and how you have chosen the option which is least intrusive etc]	-
Stop, rethink or abandon when the EqIA shows actual or potential unlawful discrimination.	-

## 5 Monitoring

Monitoring will take place through the London Plan Annual Monitoring Report and wider monitoring of the Mayor's other strategies; and when reviewing the London Plan. The evidence base for industrial land, and its correlation with protected groups, will continue to be developed, and further help to identify and monitor relevant trends.

## 6 Appendix A: Evidence reference and content

### 6.1 Age

London has a relatively young population. The median age of Londoners is 35, compared to a national average of 40. Across the capital, 32 per cent of Londoners are under 25; and 11 per cent are 65 or over.<sup>6</sup>

Around one in eight London pensioners were classified as in persistent poverty (after housing costs) between 2016-17 and 2019-20, compared to one in ten between 2012-13 and 2015-16.<sup>7</sup>

Among London's older household representative persons aged 65 and over, with 65 per cent higher proportion own their home compared to other age groups, but 27 per cent live in social rented housing, compared to 18 per cent across England as a whole.<sup>8</sup>

Young people are more likely to be unemployed than those aged 25-64.<sup>9</sup>

Younger Londoners also face higher housing costs than older groups: those aged 16-29 spend an average of 29 per cent of their net income on housing costs. This compares to 24 per cent for those aged 50-64; and 17 per cent for those aged 65 or older.<sup>10</sup>

Data from the [2021 Census \(NOMIS RM062\)](#) shows that Londoners aged 16-24 comprise around 7 per cent of all employees in industrial occupation categories A-F (manufacturing/construction/utilities)<sup>11</sup> and H (transport/storage).<sup>12</sup> This is marginally below the average of 9 per cent for all occupations. In contrast, category G (wholesale/retail/ vehicles repair)<sup>13</sup> accounts of 15 per cent of this group. This is significantly above the average, although this may be influenced by the retail occupations within this category.

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<sup>6</sup> Office for National Statistics (ONS) 2011

<sup>7</sup> [Poverty in London 2021/22 – London Datastore](#)

<sup>8</sup> Census 2011 [Census Trends in Housing Tenure](#), GLA Datastore

<sup>9</sup> [Unemployment numbers and rates by equalities group LFS, ONS, London Datastore](#)

<sup>10</sup> Resolution Foundation, [Intergenerational audit for the UK: Data dashboard, 2020](#)

<sup>11</sup> This includes the ONS' industry categories covering agriculture, quarrying, manufacturing, agriculture, quarrying, construction, energy, water and waste management. It is assumed that most of these occupations do take place on industrial land. All calculations are based on the ONS Census data tool [Create a custom dataset](#).

<sup>12</sup> This includes the ONS' industry categories covering transport, warehousing, postal and courier activities. It should be noted two-thirds of Londoners employed in this category are in passenger and freight transport activities, and passenger transport occupations may not be representative of activities that typically take place on industrial land.

<sup>13</sup> This includes the ONS' industry categories covering wholesale/retail trade and repair of motor vehicles/cycles. It should be noted that the retail activities within this category make up three-quarters of Londoners in employment in this category, which makes it less representative of activities that typically take place on industrial land.

Data from the [Annual Population Survey \(2022\)](#), which is based on a smaller sample size than the Census data, suggests that 10 per cent of UK residents aged 16-24 work in sectors related to freight transport, logistics and warehousing.

Londoners aged 50 and over comprise around 28 per cent of all employees in industrial occupation categories A-F (manufacturing/construction/utilities), marginally above the average of 26 per cent for all occupations. For employees in industrial occupation category H (transport/storage), the share is 37 per cent – significantly above average. For employees in industrial occupation category G (wholesale/retail/vehicles repair), the share is 24 per cent – marginally below average, although this may again be influenced by the retail occupations within this category.

From a transport accessibility perspective, the 2CV report [Cycling potential in London's diverse communities](#) (2021) for TfL showed that the proportion of young people aged 16-34 who cycle is 36 per cent higher than for older people.

## 6.2 Disability

According to the [2021 Census](#), 317,000 of Londoners identifying as disabled under the Equality Act are economically active and in employment.<sup>14</sup> This represents 7 per cent of all Londoners in employment. A further 41,000 are unemployed and either seeking work or waiting to start a job. This is 12 per cent of all those unemployed Londoners - a higher proportion than for those in employment.

The [2021 Census](#) indicates that there were approximately 29,000 Londoners (6 per cent) identifying as disabled under the Equality Act, and employed in industrial occupation categories A-F (manufacturing/construction/utilities). This is slightly lower than the corresponding figure of 7 per cent for all occupations. The respective shares for employees in categories G (wholesale/retail/vehicles repair) and H (transport/storage) are also around 7 per cent.

Data from the [Annual Population Survey \(2022\)](#) suggests that 15 per cent of UK residents who identify as disabled work in sectors related to freight transport, logistics and warehousing. This proportion is higher than that from the 2021 Census above.

Disabled people are more likely to live in the social rented sector than their non-disabled counterparts: Nearly 25 per cent of disabled people aged 16 to 64 years in the UK rent social housing compared with fewer than 8 per cent of non-disabled people.<sup>15</sup> In London this proportion rises to nearly 30 per cent.<sup>16</sup>

Deaf and disabled people are more likely to be living in poverty: 36 per cent of Londoners who live in families where someone is disabled are living in poverty after housing costs, compared to 26 per cent of those in families where no one is disabled.<sup>17</sup>

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<sup>14</sup> Including full-time students

<sup>15</sup> [ONS Outcomes for disabled people in the UK 2021](#)  
[16 Table 6: Housing Situation of people aged 16 to 64 by disability status and English region](#), Disability and Housing UK 2021, Annual Population Survey

<sup>17</sup> GLA analysis of Households Below Average Income data (End User dataset), Homes for Londoners: Affordable Homes Programme 2021-2026 Equality Impact Assessment



## 6.3 Gender reassignment

In 2020-21, the police recorded 2,630 hate crimes against transgender people: an increase of 16 per cent from the previous year.<sup>18</sup> Transgender people are generally more likely to experience threats of physical or sexual harassment or violence, compared with the LGBT community as a whole.<sup>19</sup> The large majority of the most serious incidents, which respondents to the National LGBT Survey experienced, went unreported.

According to data from the [2021 Census \(NOMIS, RM169\)](#), more than 5,000 Londoners employed in industrial occupation categories A-F (manufacturing/construction/utilities) identified as having a gender identity different from the sex registered at birth (1 per cent). The proportion employed in all occupations is also around 1 per cent.

## 6.4 Marriage or civil partnership

According to data from the [2021 Census](#), the proportion of Londoners employed in industrial occupation categories A-F (manufacturing/construction/utilities) who are either married or in a registered civil partnership was 47 per cent. This is higher than the 42 per cent employed in all occupations. The share of employees in category H (transport/storage) is even higher, at 52 per cent.

## 6.5 Pregnancy and maternity

No relevant evidence available.

## 6.6 Race

Black, Asian and Minority Ethnic Londoners make up 40 per cent of London's population (ONS, 2011).

39 per cent of Black, Asian and Minority Ethnic Londoners live in relative poverty after housing costs, compared to 21 per cent of White Londoners.<sup>20</sup>

Black Londoners are the ethnic group most likely not to have savings of at least £1,500.<sup>21</sup> Black, Asian and Minority Ethnic Londoners are also more likely to be younger and on lower incomes.<sup>22</sup>

London sees lower-than-average employment rates among Black African, Caribbean and Other Black ethnic groups; Bangladeshi, Pakistani, Mixed Ethnic groups; Other ethnic groups; and White Gypsy or Irish Travellers.<sup>23</sup> Among these groups, employment rates are particularly low for those aged 16-24 – and, notably, males aged 16-24 in the Black

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<sup>18</sup> Home Office, 2021

<sup>19</sup> National LGBT Survey, Government Equalities Office - [Stop Hate UK - About Hate Crime – Transgender Hate](#)

<sup>20</sup> GLA analysis of Households Below Average Income data (End User dataset), Homes for Londoners: Affordable Homes Programme 2021-2026 Equality Impact Assessment

<sup>21</sup> [GLA Survey of Londoners 2021 - 2022](#)

<sup>22</sup> London Travel Demand Survey 2016/17

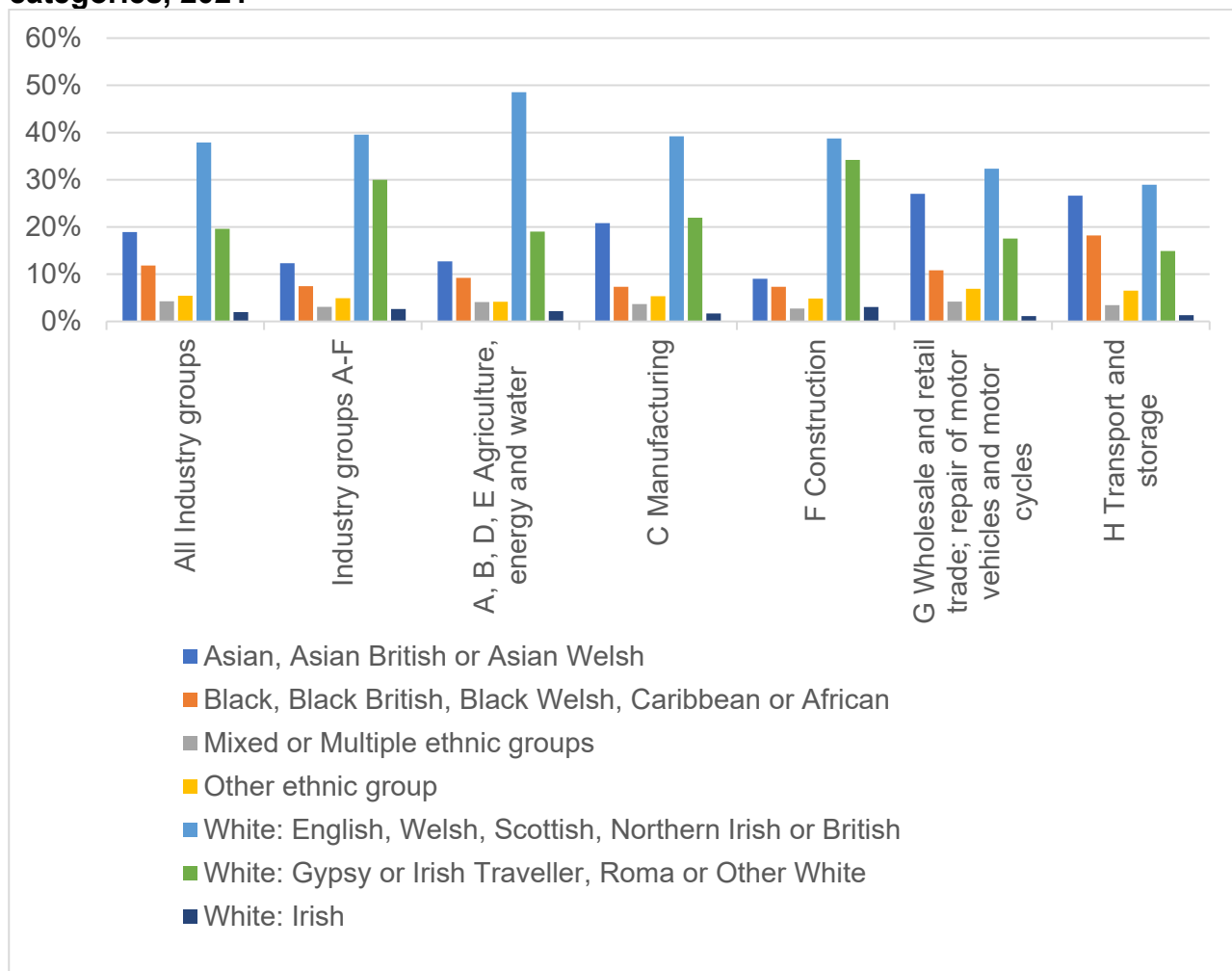
<sup>23</sup> ONS 2021 Census tables

African, Caribbean, and Other Black ethnic groups; Mixed Ethnic groups; and White Gypsy or Irish Traveller groups.

According to data from the [2021 Census](#), there were 141,000 Londoners from Black, Asian and Minority Ethnic groups employed in industrial occupation categories A-F (manufacturing/construction/utilities) (28 per cent). This is below the average of 40 per cent for all occupations. Of this total, 63,000 (12 per cent) identified as Asian, Asian British or Asian Welsh; 38,000 (7 per cent) as Black, Black British, Black Welsh, Caribbean or African; 16,000 (3 per cent) as being from Mixed or Multiple ethnic groups; and 25,000 (5 per cent) as from 'Other' ethnic groups. These figures are all below the average for Londoners in these ethnic groups, employed in all occupations. Further detail is included in Figure 1.

For categories G (wholesale/retail/vehicle repair) and H (transport/storage), the share of Black, Asian and Minority Ethnic employees is 49 per cent and 55 per cent respectively. This is well above the 40 per cent share for all occupations. However, the inclusion of retail and passenger transport activities that may not take place on industrial land should be highlighted again.

**Figure 1 – Londoners in employment: Ethnic groups' share of occupation categories, 2021**



Source: ONS, 2021 Census

In contrast, data from the [Annual Population Survey \(2022\)](#) suggests that only 16 per cent of UK residents from Black, Asian and Minority Ethnic groups work in sectors related to freight transport, logistics and warehousing.

## 6.7 Religion or belief

To the extent that Londoners hold particular religious beliefs, they are disproportionately held by Black, Asian and Minority Ethnic groups (Census 2021).

According to the [2021 Census](#), Londoners identifying as Christian comprise almost 50 per cent of residents employed in industrial occupation categories A-F (manufacturing/construction/utilities) - higher than the average of 41 per cent for Christians across all occupations. For Muslim it is 7 per cent in these industrial occupations, versus 10 per cent across all occupations; Hindu, 4 per cent versus 5 per cent; Sikh, 2.1 per cent versus 1.6 per cent; Jewish, 1 per cent versus 1.5 per cent; and Buddhist, 0.6 per cent versus 0.9 per cent.

The shares of Muslim employees in categories G (wholesale/retail/vehicle repair) and H (transport/storage) are 15 per cent and 21 per cent respectively. This is significantly higher than the 10 per cent average for all occupations. For Hindu employees there is a similar pattern: the shares for these categories are 9 per cent and 6 per cent respectively, compared to 5 per cent for all occupations.

## 6.8 Sex

Data from the [2021 Census \(NOMIS RM065\)](#) shows that 113,000 female Londoners were employed in industrial occupation categories A-F (manufacturing/construction/utilities) (22 per cent), well below the average of 48 per cent for all occupations. Specifically for construction, the share of female residents was even lower at 15 per cent. In contrast, the share for manufacturing was significantly higher at 41 per cent. The proportion for category G (wholesale/retail/vehicle repair) is 47 per cent – close to the average. Category H (transport/storage) is similar to categories A-F, at around 20 per cent.

Data from the [Annual Population Survey \(2022\)](#) indicated that female representation in sectors related to freight transport, logistics and warehousing was around 24 per cent.

Research in a paper produced by [Prologis](#) found that the proportion of female employees in the logistics sector grew from 34 per cent to 39 per cent between 2018 and 2022. These figures are higher than the average female representation (among Londoners) in industrial occupations cited above. The exception to this is category G, which has to be caveated due to its large share of retail occupations.

## 6.9 Sexual orientation

According to the [2021 Census \(NOMIS RM184\)](#), the proportion of Londoners employed in industrial occupation categories A-F (manufacturing/construction/utilities) identifying as gay or lesbian was 1.3 per cent. This is lower than the proportion across all occupations (2.8 per cent). The share of gay and lesbian Londoners in construction was particularly low, at 0.8 per cent. For Londoners identifying as bisexual it was 1 per cent in industrial occupations, against 1.6 per cent in all occupations.

## 6.10 People on low incomes

The proportion of Londoners saying they were ‘financially struggling’ increased from 12 per cent in January 2022 to 17 per cent in January 2023. Londoners living in social rented accommodation, who have a gross household income under £20,000, remain the most likely to be ‘financially struggling’. In January 2023, 54 per cent of Londoners said they struggled to pay for food and essential items. This is up from 39 per cent in January 2022.<sup>24</sup>

A quarter of Londoners (25 per cent) did not have at least £1,500 in savings in 2021-22. This is a significant reduction from 33 per cent in 2018-19.<sup>25</sup>

Despite higher average incomes, more expensive housing means that the 2019-20 (pre-pandemic) poverty rate in London almost doubles when housing costs are taken into account (from 16 per cent to 27 per cent). This makes London the region with the highest poverty rate in the UK. Poverty rates are even higher in Inner London (30 per cent), where they are 5 per cent above many parts of the North of England. Poverty rates also varied significantly across London’s boroughs (Trust for London, 2022). Around one in six Londoners, including three in ten children, are in persistent poverty. Child poverty is most acute in wards in Tower Hamlets, Hackney and Camden.<sup>26</sup>

Lower-income households are more likely to rent, with those in the poorest 20 per cent of households the most likely to be in social rent housing.<sup>27</sup>

## 6.11 Other groups

### Carers

Caring comes with additional costs that can have a significant impact on carers’ finances; many suffer financial hardship. 44 per cent of working-age adults who are caring for 35 hours or more a week are in poverty (Joseph Rowntree Foundation, UK Poverty 2022).

Being a carer also links to sex as a protected characteristic, as women make up the majority (59 per cent) of unpaid carers (Census 2021).

### Looked-after children

There is concern for distribution of housing options, including sufficient in-borough provision (including foster care), which is likely to correlate with the availability of affordable housing. Statutory guidance assumes that foster carers can access the homes they need, including affordable homes, in each borough. Given the need for affordable homes across London, this seems unlikely to be the case.<sup>28</sup> Further evidence is needed, however.

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<sup>24</sup> [GLA Poll Results survey \(2023\)](#)

<sup>25</sup> [GLA Survey of Londoners 2021 - 2022](#)

<sup>26</sup> [Poverty in London 2021/22 – London Datastore](#)

<sup>27</sup> GLA 2019

<sup>28</sup> [Statutory Guidance on Securing Sufficient Accommodation for Looked After Children \(2010\)](#)

## 6.12 Intersectional evidence

### Industry group/ethnic group / age

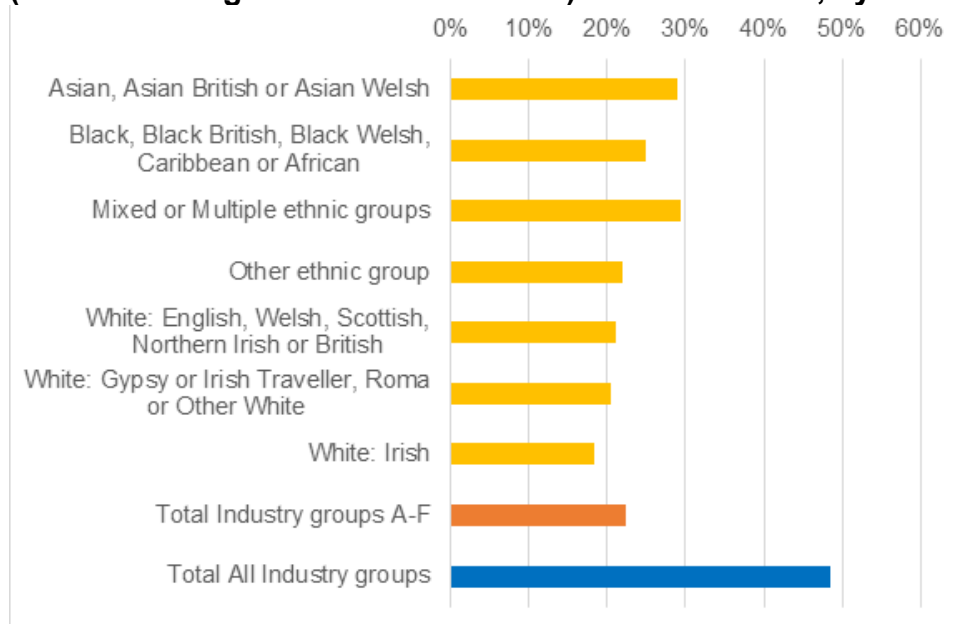
According to data from the [2021 Census](#), there is underrepresentation of Londoners employed in industrial occupation categories A-F (manufacturing/construction/utilities), who identify as Asian, Asian British or Asian Welsh. The representation from this ethnic group is 7 per cent lower compared to all occupations, and notably those aged 16-49. There is also underrepresentation, across all age groups, of those who identify as Black, Black British, Black Welsh, Caribbean or African. The representation from this group is 4 per cent lower than for all occupations – for those aged 16-24, it 6 per cent lower. The cumulative underrepresentation of Black, Asian and Minority Ethnic groups in construction occupations is particularly significant at 21 per cent.

In contrast, in categories G (wholesale/retail/vehicles repair) and H (transport/storage), Black, Asian and Minority Ethnic groups are overrepresented. In category G there is above-average representation across all age groups and up to 11 per cent among those aged 50 to 64, compared with all occupations among Londoners who identify as Asian, Asian British or Asian Welsh. For category H (transport/storage) there is also above-average representation, ranging up to 10 per cent for those aged 35 to 49 among Asian, Asian British or Asian Welsh Londoners. Similarly, the representation among Black, Black British, Black Welsh, Caribbean or African is around 5 per cent higher than for all occupations across all age groups.

### Industry group/ethnic group / sex

According to data from the [2021 Census](#), there is underrepresentation of female Londoners employed in industrial occupation categories A-F (manufacturing/construction/utilities) across all ethnic groups, ranging from 18 per cent female representation in the White Irish ethnic group up to 29 per cent in the Asian, Asian British or Asian Welsh group and Mixed or Multiple ethnic groups. Figure 2 provides further details.

**Figure 2 – Percentage of Londoners employed in industrial occupations A-F (manufacturing/construction/utilities) who are female, by ethnic group**



Source: ONS 2021 Census

Looking at the sub-sectors, the share of female Londoners in manufacturing is closer to the average for all occupations. The grouping of White Gypsy or Irish Traveller, Roma or Other White slightly exceeds the average of 48 per cent across all occupations by 1 per cent. Conversely, in other industrial occupations such as construction, the underrepresentation is more significant than the average across all industrial and related occupations. For category G (wholesale/retail/vehicle repair) the share of female Londoners is close to the average female representation across all occupations. Figures range from 41 per cent in the Asian, Asian British or Asian Welsh grouping, up to 56 per cent in the White Gypsy or Irish Traveller, Roma or Other White grouping.

While there has been improvement over the last decade, in terms of reducing labour-market inequalities, they are still pronounced. This is especially the case when comparing outcomes for Londoners by ethnic background, disability status, and caring for dependants.<sup>29</sup>

## 6.13 Area profiles

The GLA has analysed population profiles of the areas surrounding a sample of the following five SILs in London using the [ONS 2021 Census custom build profiles](#):

- Park Royal in West London
- Central Leaside in North London
- River Road (Barking & Dagenham) in East London
- Purley Way/Beddington Lane in South London

<sup>29</sup> [GLA Intelligence 2022, Employment gaps](#)

- Old Kent Road in Central London.

For their immediate hinterlands, a population count of around 30,000 residents was selected. This equates to a radius of 1km around the River Road and Old Kent Road SILs; and a 1.5km radius around the Central Leaside, Park Royal and Purley Way/Beddington SILs.

As set out in Table 4, all of the sample SIL immediate hinterlands had broadly similar proportions of female and male residents, compared to London as a whole. The immediate hinterlands of the Old Kent Road and Central Leaside SILs had marginally higher proportions of residents identifying as Disabled under the Equality Act. With regards to economic activity rates for residents. The immediate hinterlands of Central Leaside, Park Royal and River Road had lower proportions of economically active residents in employment compared to London as a whole.

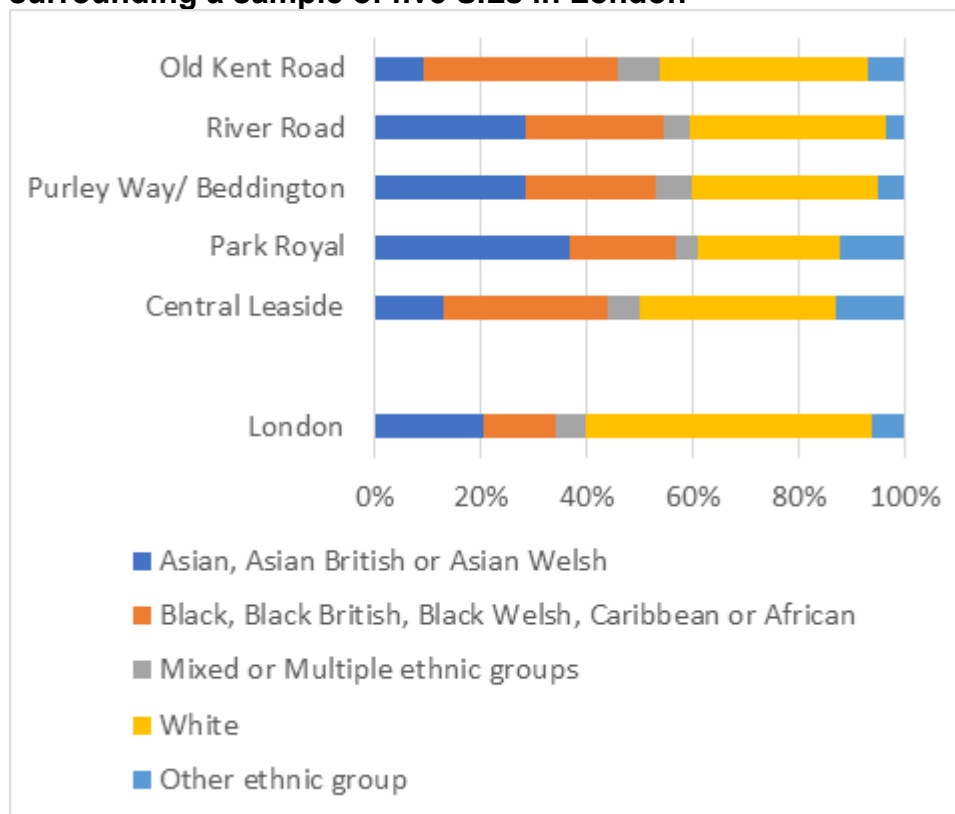
**Table 4 – Population profiles of the immediate areas surrounding sample strategic SILs**

Area profile	London	Central Leaside	Park Royal	Purley Way/Beddington	River Road	Old Kent Road
Radius	n/a	1.5km	1.5km	1.5km	1km	1km
Population	8,799,700	29,500	33,700	38,300	35,200	34,600
Female (per cent)	51.5	51.8	50.2	51.6	51.3	52.4
Disabled under the Equality Act (per cent)	13.2	14.0	11.3	13.1	11.9	15.0
Economically active in employment (per cent)	61.4	52.9	58.5	61.3	59.3	61.5

Source: ONS Census 2021 / GLA

The ethnic group profiles of the population in these areas are illustrated in Figure 3. All of the immediate hinterlands around the five sample SILs had significantly higher percentages of residents from Black, Black British, Black Welsh, Caribbean or African groups, compared to London as a whole. Some SILs – notably Park Royal, Purley Way/Beddington and River Road – also had a significantly higher percentage of residents from Asian, Asian British or Asian Welsh backgrounds, compared to London as a whole. All of the immediate hinterlands of the sample SILs had a significantly lower percentages of residents from White ethnic groups, compared to London as a whole.

**Figure 3 – Ethnic group population profiles of the immediate hinterlands\* surrounding a sample of five SILs in London**



Source: ONS Census 2021 / GLA

\* All 1.5km radius from centre of each SIL, except River Road and Old Kent Road SILs (1km radius)

The age profiles of the immediate hinterlands of the Central Leaside, River Road and Purley Way/Beddington SILs had a higher percentage of children and young people aged up to 19 compared to London as a whole. The 1km hinterland of Old Kent Road in central London had a higher percentage of residents aged 20-34.

## 6.14 Gaps in evidence

No data is available that specifically focuses on the correlation between protected characteristics and industrial business ownership, or the profiles of customers who may in particular rely on products and services generated on industrial land.

Further work is needed with the ONS occupation categories to identify data that reliably focuses on the correlation between the protected characteristics and employment on industrial land, to ensure the most accurate representation of occupations expected to work on industrial land. This includes a further breakdown of occupation categories G (wholesale/retail/vehicle repair) and H (transport/storage), which would help to ensure that the significant proportions of retail and passenger transport activities are not included in the analysis.

In terms of access to industrial areas, no data is available about this, or about relative mode use of protected characteristics to employment in designated industrial areas.



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For the protected characteristic pregnancy and maternity, there is no data available from the ONS or other sources. Therefore, the extent to which this correlates with improving conditions on and around industrial land cannot be assessed.

## 7 Appendix B: Engagement summary

### 7.1 Summary of groups engaged and engagement record

Robust equality information is necessary to design and deliver effective and efficient guidance. Where there are information gaps about people who may be affected with particular protected characteristics, focused and targeted engagement may help.

#### Already engaged

Early engagement has taken place with representatives from a range of industrial sector experts, including through the Industrial and Logistics Sounding Board; the New London Architecture Expert Panel on Industrial and Logistics; and London boroughs, including the Industrious London Officer Network.

There have also been several [Planning for London Programme](#) events with participants from London's diverse communities. Their purpose has been to understand the breadth of views on the challenges around jobs and housing that are faced in London, including the role of industrial land.

#### Future engagement

More formal engagement to inform the further refinement of this document will take place during the consultation period.

Through the EqIA process, protected groups have been identified as being positively impacted. Given this, and as this is an LPG consultation rather than an opportunity to influence policy change, no further targeted consultation is planned.

### 7.2 Engagement record

**Table 5: engagement record**

Event details	Specific groups represented	Key findings

## 8 Appendix C: Legal context

### 8.1 Equality Act 2010

The Equality Act 2010 replaced the pre-existing anti-discrimination laws with a single Act. The legislation covers the exercise of public functions, employment and work, goods and services, premises, associations, transport and education.

The Act prohibits victimisation and harassment, and all of the following forms of discrimination: direct; indirect; by association; by perception; and discrimination arising from disability.

The Act recognises [nine protected characteristics](#), as listed below.

#### 1. Age

A person having a particular age or being within an age group. This covers all ages, including children and young people.

#### 2. Disability

A physical or mental impairment that has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities. Certain medical conditions are automatically classed as being a disability – for example, cancer, HIV infection and multiple sclerosis.

#### 3. Gender reassignment

A person has the protected characteristic of gender reassignment if they are proposing to undergo, are undergoing or have undergone a process (or part of a process) to reassign their sex by changing physiological or other attributes of sex ([Equality Act 2010, Section 7 \(1\)](#)).

#### 4. Marriage and civil partnership

Marriage is a union between a man and a woman, or between a same-sex couple.

Couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must not be treated less favourably than married couples (except where permitted by the Equality Act 2010).

Marriage and civil partnership are a protected characteristic for the purposes of the duty to eliminate discrimination.

#### 5. Pregnancy or maternity

Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth. This includes treating a woman unfavourably because she is breastfeeding.

## 6. Race

In the Equality Act, race can mean your colour, or your nationality (including your citizenship). It can also mean your ethnic or national origins, which may not be the same as your current nationality. For example, you may have Chinese national origins and be living in Britain with a British passport.

Race also covers ethnic and racial groups. This means a group of people who all share the same protected characteristic of ethnicity or race.

## 7. Religion or belief

Religion refers to any religion, including a lack of religion. Belief refers to any religious or philosophical belief (including ethical veganism) and includes a lack of belief (for example, atheism).

## 8. Sex

A man or a woman.

## 9. Sexual orientation

Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.

Though not a protected group in the Equality Act 2010, the GLA recognises that socio-economic disadvantage is a significant contributor to inequality across London and therefore regards people on low incomes as an additional group against which to assess equality impacts.

## 8.2 Public Sector Equality Duty aims

The PSED set out at Section 149 of the Equality Act 2010 requires public bodies, when exercising its functions, to have 'due regard' to the following:

- Aim 1: eliminate discrimination, harassment and victimisation and other conduct prohibited under the Act.
- Aim 2: advance equality of opportunity between people who share a protected characteristic and those who do not.
- Aim 3: foster good relations between people who share a protected characteristic and those who do not.

The first aim means giving advance consideration to discrimination issues before making policy decisions. It relates particularly to scrutinising policies, practices or decisions that could result in discrimination or other prohibited conduct.<sup>30</sup>

Having due regard to second aim involves having due regard, in particular, to the need to:

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<sup>30</sup> [EHRC Technical Guidance](#)

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- Aim 2(a): remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic.
- Aim 2(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.
- Aim 2(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.

Having due regard to the third aim involves having due regard, in particular, to the need to:

- 3(a) tackle prejudice
- 3(b) promote understanding.

The three aims of the duty are known as the 'general equality duty'. They must be fulfilled before and at the time of the exercise of a public function and on a continuing basis by the GLA when exercising its functions. Each aim must be considered in turn: for example, the obligation to have due regard to advancing equality is quite separate from the obligation to have due regard to eliminating discrimination.