



Early Minor  
Alternations to the  
London Plan  
Equalities Impact  
Assessment

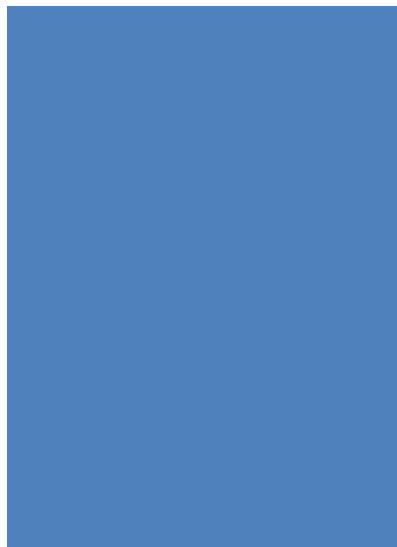
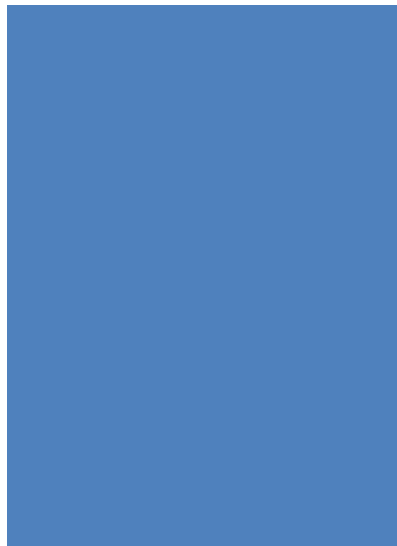
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## 1 SUMMARY OF FINDINGS AND RECOMMENDATIONS

- 1.1.1 URS considered the effects of the EMALP were likely to be broadly positive when considered against the equality objectives.
- 1.1.2 The early alterations to Affordable Housing Policy should provide increased certainty regarding Affordable Rent housing in London, which should support the sustained delivery of new affordable housing. The alterations are likely to contribute positively to provision of family housing and for creating mixed, sustainable communities, with likely positive benefits for relations between different groups. However, significant uncertainty regarding the national introduction of Affordable Rent and the complex relationship with welfare reforms is likely to affect the extent to which the benefits for groups of people sharing protected characteristics will be realised.
- 1.1.3 It remains uncertain how people sharing protected characteristics will respond to the combination of changes facing Londoners as a result of: welfare reform; the national introduction of Affordable Rent; the early alterations to London Plan policies on Affordable Housing; and new housing strategies for England and for London. We consider that the Mayor's proposals for ongoing monitoring and review of the impact of the revised London Housing Strategy are also relevant for monitoring the early alterations to the London Plan affordable housing policies. We recommend the Mayor works closely with the Department for Work and Pensions and the Department for Communities and Local Government to monitor and review the actual cumulative effects of these policy changes for Londoners, with an emphasis on identifying patterns that indicate groups of people sharing protected characteristics are differently affected.
- 1.1.4 The alterations to the policy wording regarding hazardous installations are likely to have positive impacts for regeneration, which are likely to be particularly important in areas of existing deprivation, with the potential of contributing towards equality objectives.
- 1.1.5 The alterations to the cycle parking standards may have a positive impact on equalities objectives, by promoting improved provision, which may support widened uptake of cycling.
- 1.1.6 We recommend that the Mayor and TfL:
- Consider further strengthening of policy or advice to support the inclusion of cycle parking suited to the needs of disabled cyclists (see 4.5.6). In response to this recommendation, TfL has stated that further information relating to provision of cycle facilities for disabled people will be included within the revised version of the London Cycling Design Standards which are due for publication later this year.

**Recommended monitoring indicators**

- 1.1.7 It is considered that the equality impacts of the early minor alterations to London Plan policies concerning affordable housing would be best monitored through monitoring the revised London Housing Strategy indicators.
- 1.1.8 Monitoring cycling rates by protected characteristic would enable an understanding of uptake by different groups of Londoners. However, it is unlikely that this could be meaningfully linked back to the revised parking standards.
- 1.1.9 No specific equality monitoring is recommended regarding the early minor alterations concerning hazardous installations.

## 2 INTRODUCTION

### 2.1 About this report

2.1.1 This report is the draft Equalities Impact Assessment (EQIA) of the Early Minor Alterations to The London Plan (referred to in this report as ‘the Early Minor Alterations’). URS was commissioned by the Mayor to undertake the EQIA as part of an Integrated Impact Assessment (IIA) of the Early Minor Alterations.

### 2.2 Equality duties of the Mayor and the Greater London Authority

2.2.1 The Mayor and the Greater London Authority (GLA), like all public bodies, have statutory duties to promote equality arising from the Equality Act 2010. The Mayor and the GLA also have an additional duty to promote equality of opportunity arising from the GLA Act 1999 (as amended).

2.2.2 The Equality Act 2010 has come into force since the preparation of the IIA for the current London Plan. This brings together and replaces all the previous discrimination legislation. The Act contains a new single public sector equality duty (“the Duty”) which brings together the previous race, disability and gender duties and extends coverage to the following:

- age
- gender reassignment
- pregnancy and maternity
- religion or belief
- sexual orientation and
- marriage and civil partnership (applicable only to the need to eliminate unlawful discrimination)

- 2.2.3 These are the grounds upon which discrimination is unlawful and are referred to as ‘protected characteristics.’
- 2.2.4 The Duty requires the Mayor and the GLA when exercising their functions to have due regard to the need to:
1. **Eliminate unlawful discrimination, harassment and victimisation** and any other conduct which is unlawful under the Equality Act 2010
  2. **Advance equality of opportunity** between people who share a protected characteristic, and those who don’t have that characteristic. This means in particular:
    - a. **Removing or minimising disadvantages** suffered by people who share a protected characteristic that are connected to that characteristic
    - b. **Taking steps to meet the needs of people who share a protected characteristic** that are different from the needs of people who don’t have that characteristic
    - c. **Encouraging people** who share a protected characteristic **to participate in public life or in any other activity** in which their participation is disproportionately low
  3. Foster good relations between people who share a protected characteristic, and those who don’t have that characteristic. This means, in particular:
    - a. Tackling prejudice
    - b. Promoting understanding
- 2.2.5 Compliance with these duties may involve treating some persons more favourably than others.
- 2.2.6 The Mayor is also subject to specific duties in relation to equality of opportunity under section 33 of the GLA Act 1999, as amended. He is required to undertake an EQIA in the development of his strategies and to publish a summary report of the EQIA conforming to the requirements of the Act alongside drafts for public consultation and with final strategies.
- 2.3 The Early Minor Alterations to the London Plan**
- 2.3.1 The GLA Act 1999 (as amended) gives the Mayor of London the power and responsibility to produce a Spatial Development Strategy for London (which is generally known as the London Plan) and to keep it under review and alter or replace it as necessary.



- 2.3.2 The latest London Plan underwent an Examination in Public between July and December 2010 and was published on 22 July 2011. During the later stages in the process to adopt this Plan, the Government announced some important proposals to change the planning system and land use policies including introducing a new Affordable Rent product. It was not possible to include these changes within the Plan.
- 2.4 Why are these early minor alterations needed?**
- 2.4.1 The London Plan was published in July 2011. The period of its preparation included the May 2010 General Election, and changes were made to the draft Plan as the process went forward to ensure that account was taken of policy changes announced by the Coalition Government. It was not possible, however, to deal fully with all of the changes, particularly those made by the Government to change the definition of “affordable housing” for planning purposes, bringing in a new Affordable Rent product alongside social rent and intermediate housing.
- 2.4.2 This change was signalled in the London Plan (see paragraph 3.63), but on legal advice the Mayor did not consider it was appropriate to change the affordable housing policies to fully reflect it. Accordingly, he published the Plan on the basis that he would bring forward supplementary guidance explaining how its policies should be applied in the light of changing Government policy, pending a formal alteration to bring the Plan fully up-to-date. It was on this basis that the Secretary of State agreed that publication should proceed.
- 2.4.3 The other development it was not possible to reflect in the London Plan was the publication by the Government of the draft National Planning Policy Framework (NPPF). This was published for consultation in July 2011, with comments sought by 17 October 2011. The Government intends that the NPPF will replace the suite of Planning Policy Statements (PPSs) and Guidance Notes (PGNs), replacing around a thousand pages of guidance across forty documents with a single document of 50-60 pages. The publication of the NPPF will therefore make the references to Government guidance in the London Plan out of date. While the general policy approach in the draft Framework is consistent with that in the London Plan, there may also be doubts about the respective status of the two documents after the NPPF is published.
- 2.4.4 The London Plan also signalled the Mayor’s intention to commission Transport for London to review cycle parking standards (paragraph 6A.11). Considerable progress has been made on this review, and it is possible to bring forward some improvements to the standards informed by its initial conclusions.

- 2.4.5 The opportunity is being taken, as part of the early minor alterations to the London Plan, to make provision to publish guidance on developments potentially affected by hazardous installations. This is in response to a degree of uncertainty expressed by the boroughs and developers about the process regarding hazardous installations and the relative roles of the various organisations involved. This proposed alteration is to ensure appropriate weight can be given to any supplementary guidance in line with Circular 1/2008 which states planning guidance published by the Mayor should be based on published policy that has undergone Examination.
- 2.4.6 The Mayor considers that these alterations are “minor” for the purposes of regulation 7 (7) of the Town and Country Planning (London Spatial Development Strategy) Regulations 2000. This means that the period of full public consultation that takes place following this initial round with the London Assembly and GLA functional bodies should be a period of not less than six weeks, rather than twelve. He takes this view given that alterations are proposed to five policies of the 122 in the London Plan. Those dealing with the Government’s new Affordable Rent product were clearly highlighted in the published London Plan, while other policies merely involve moving supporting text into formal policy.
- 2.4.7 Under the GLA Act 1999 (as amended), the Mayor is required to undertake two rounds of consultation on the statutory plan, first, with the London Assembly and functional bodies (Transport for London, London Development Agency, Metropolitan Police Authority, London Fire and Emergency Planning Authority) and, second, with the public. An initial formal document was submitted to the Assembly and the GLA functional bodies in November 2011. This version has been prepared for consultation with the public in February 2012. The final version will be subject to an Examination in Public, with adoption likely in late 2012/early 2013.
- 2.4.8 In preparing and making alterations to the London Plan, the Mayor has a legal responsibility to have regard, among other matters, to the effect it would have on equalities, the health of people in London, health inequalities in London, climate change and its consequences, and the achievement of sustainable development in London. This EQIA has been undertaken as part of an IIA. This will enable these responsibilities to be discharged efficiently and cost-effectively, whilst ensuring thorough analysis of the potential effects of the early alterations for groups of Londoners sharing protected characteristics.
- 2.4.9 The EMALP seek to achieve a number policy changes and clarifications, outlined below. The bullet point list below also identifies those alterations which are considered to be substantive changes that require IIA appraisal.
- Add a new paragraph to the Overview and Introduction chapter of the Plan dealing with the NPPF giving advice about the status of the Plan following publication of the Framework and explaining that the Mayor will make any

necessary changes to the Plan once the final NPPF is published. This involves no change to the overall policy and so does NOT require IIA appraisal.

- Change London Plan policies 3.8-3.13 dealing with affordable housing. In particular, an alteration to the definition of 'affordable housing' in Policy 3.10 is proposed to include the Government's new 'affordable rent' product. Changes are proposed to Policy 3.11 with an updated approach to setting affordable housing targets in Local Development Frameworks. Alterations are also proposed to Policy 3.12 to give a clear preference to on-site provision, with off-site next and financial payments in lieu third, to give additional weight to the text in paragraph 3.74. The changes to: policy 3.10 Definition of affordable housing; policy 3.11 affordable housing targets; and policy 3.12 negotiating affordable housing involve substantive policy change and so DO require IIA appraisal.
- Include additional wording to Policy 5.22 Hazardous substances and installations to make provision for the preparation of supplementary guidance on this matter. This would give weight to any supplementary planning guidance produced and so DOES require IIA appraisal.
- Change to policy 6.9 cycling to reflect updated cycle parking standards, following a review carried out by Transport for London. This is a substantive policy change that DOES require IIA appraisal.
- Delete the London Plan Glossary definition of 'Air Quality Neutral', which has been suggested to be unhelpful. No change to the policy on air quality (7.14) is proposed. This is not considered a substantive change and so does NOT require IIA appraisal.

### Equality policy

- 2.4.10 [Equal Life Chances for All](#) (GLA, 2009) sets out the approach of the Mayor and the GLA towards promoting equal opportunities for all Londoners to share in the benefits of growth and economic opportunities. It adopts an aspirational definition of equal opportunities:

*An equal society protects and promotes equal, real freedom and the opportunity to live in the way people value and would choose, so that everyone can flourish. An equal society recognises people's different needs, situations and goals, and removes the barriers that limit what people can do and be.'*

- 2.4.11 Within a framework of desired outcomes, it prioritises a decrease in the levels of homelessness and an increase in the diversity of housing. Specific outcomes are:
- decrease in the levels of homelessness;
  - increase in the amount of affordable housing;
  - increase in the amount of family sized housing; and

- increase in the amount of Lifetime homes.

- 2.4.12 The GLA uses an evidence-based approach to determine needs and priorities to inform housing and other key policy areas that affect Londoner's quality of life.
- 2.4.13 The London Plan has as one of its headline objectives to contribute to:
- 2.4.14 'Ensuring London is:....A city that meets the challenges of economic and population growth in ways that ensure a sustainable, good and improving quality of life and sufficient high quality homes and neighbourhoods for all Londoners, and help tackle the huge issue of deprivation and inequality among Londoners, including inequality in health outcomes.'
- 2.4.15 Whilst Policy 3.1 Ensuring Equal Life Chances For All, forms the centre piece of efforts within the Plan to promote equality, other policies throughout the London Plan are directed towards addressing existing inequalities, including in relation to housing and health.

**Issues affecting groups of people sharing protected characteristics relevant to the Early Minor Alterations**

- 2.4.16 The Early Minor Alterations, in addressing the definition of affordable housing and targets for provision, is relevant to groups of people sharing protected characteristics who disproportionately experience housing needs, including problems of affordability, homelessness and overcrowding and housing that is not adapted to meet disability needs or other life changing needs as people get older. For many of these groups, their experience of housing problems is related to the high rates of poverty amongst them.
- 2.4.17 The Early Minor Alterations' proposed revisions to cycle parking standards have the potential to affect people sharing protected characteristics differentially, due to differences in rates of cycling amongst Londoners. The different barriers to taking up cycling identified by people who share protected characteristics may also be relevant to consideration of the policies' equality impacts.
- 2.4.18 Hazardous installations, such as gas storage sites, are more frequently found in areas with existing high levels of deprivation. This means that the policy addressing these installations may have relevance to issues of equality and deprivation.

## 2.5 How this assessment was undertaken

- 2.5.1 A scoping report for the IIA was prepared in-house by the GLA. This identified relevant strategies and baseline evidence relating to people sharing protected characteristics to inform the appraisal stage. It also identified appraisal objectives, questions and possible indicators for monitoring the impact of the Early Minor Alterations for equalities outcomes. URS undertook a technical review of the scoping report which included consideration of whether it was consistent with Equalities and Human Rights Commission (EHRC) guidance in relation to the Equalities Act 2010.
- 2.5.2 URS and GLA officers attended a meeting with the Housing Equalities Standing Group (HESG) principally to engage the views and expertise of the group regarding the revised London Housing Strategy (LHS). This meeting also resulted in information and views being shared relevant to the potential equality impacts of the Early Minor Alterations. At a further stakeholder meeting specifically for the Early Minor Alterations, further views and evidence were discussed regarding the potential impacts of the Early Minor Alterations, including equality impacts.
- 2.5.3 The appraisal stage involved a review of the evidence baseline, drawing on additional evidence to address identified gaps, including gaps identified during the stakeholder engagement process.
- 2.5.4 The appraisal took into consideration the findings of the Government's Full Equality Impact Assessment for Affordable Rent (EQIA for AR) (CLG, 2011). This recognised potential adverse impacts for some households in being offered affordable rent housing as compared to if they were allocated a social rent property, in terms of the introduction of time-limited tenure and potential for higher rents. Balanced against that, it identified that the policy would bring substantial advantages to the same type of households by increasing supply. The Government's EQIA for AR identified that in the absence of this policy the resulting limited supply could have the effect that people in housing need would not receive any form of affordable tenancy and would remain in the private rented sector.
- 2.5.5 The Government's EQIA for AR also recognised interaction between the introduction of Affordable Rent nationally and policies being developed by the Department for Work and Pensions on Housing Benefit, to introduce a Universal Credit. The Government's EQIA for AR states that the Homes and Communities Agency (HCA) and local authorities will be responsible for carrying out equality analysis, with the HCA reporting periodically to Department for Communities and Local Government (CLG).

- 2.5.6 The appraisal considered the potential impacts of the proposed early minor alterations to the London Plan policies and supporting text, in terms of contributing to equality objectives, with reference to a set of appraisal questions.
- 2.5.7 Will the early minor alterations to the London Plan:
- meet the requirements of the Equality Act 2010 to eliminate unlawful discrimination, harassment and victimisation?;
  - advance equality of opportunity in relation to people with protected characteristics as set out by the Equality Act 2010?;
  - foster good relations as set out by the Equality Act 2010 between people who share a protected characteristic and those who don't have that characteristic?; and
  - reduce poverty and social exclusion in the areas and communities most affected and provide opportunities to increase life chances?.

- 2.5.8 The appraisal used a qualitative approach, based on the subjective judgment of the equalities lead, with reference to the evidence base, but drawing on her wider knowledge of equalities issues. The equalities appraisal was also informed by the insights and analysis of a housing specialist, drawing on her background in housing strategy and delivery to interpret the effects of the EMALP's incorporation of recent policy and legislative changes. The appraisal included consideration of potential impacts for people who share more than one protected characteristic.
- 2.5.9 During the appraisal period the Government published its Housing Strategy for England, *Laying the Foundations*<sup>1</sup>. Some of the key announcements have already been addressed by the Early Minor Alterations, others are yet to be consulted on by the Government (e.g. Right to Buy re-provision) and it is likely that the Mayor's future policies will need to adapt in the light of the strategy and its roll-out. It has not been possible to fully consider the potential cumulative equality impacts of the Early Minor Alterations in combination with wider national policy changes to welfare benefits, Affordable Rent and housing supply since the Government's Welfare Benefit Reform and NPPF, which are not yet settled.
- 2.5.10 Following from the identification of potential impacts, recommendations were made to the GLA in terms of potential additions or changes to Early Minor Alterations and other mitigation actions to minimise or avoid potential damaging impacts for equality.
- 2.6 Evidence sources for the assessment**
- 2.6.1 The baseline data used in this EQIA is mainly from the Early Minor Alterations 2011 IIA scoping report and existing reports and documentation, including that signposted to us by Early Minor Alterations stakeholders. It also includes feedback received through consultation with the Assembly and function bodies and the statutory consultees.
- 2.6.2 Data limitations were identified in the scoping report, with regards to certain protected characteristics, including regarding the housing needs and experiences of people who have undergone gender reassignment and the characteristics of households living in overcrowded housing. These data limitations may impact on the ability to arrive at robust judgments regarding the potential impact of policies on groups of people sharing relevant protected characteristics. During the appraisal, some of the early data limitations were successfully addressed, including through the identification of additional evidence regarding: disabled people in London, housing provision; and the diversity profile of cyclists, in relation to gender, age and ethnicity.

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<sup>1</sup> *Laying the Foundations: A Housing Strategy for England*, HM Government Nov 2011

**3 SUMMARY OF EVIDENCE REGARDING GROUPS SHARING EQUALITY PROTECTED CHARACTERISTICS**

- 3.1.1 The IIA of the Early Minor Alterations report provides more comprehensive evidence regarding the baseline situation. This includes information on housing delivery, housing affordability and poverty rates in London. It also includes additional baseline data on cycling and on hazardous installations. The IIA Scoping Report provides a full baseline of evidence.
- 3.1.2 Table 3-1 summarises evidence regarding housing needs amongst groups of people sharing protected characteristics. The data is taken from the Early Minor Alterations IIA Scoping Report as well as the LHS IIA Scoping Report. The evidence is presented in relation to protected characteristics, as defined in the Equality Act 2010.

**Table 3-1: Summary of housing needs of groups sharing equality protected characteristics**

Equality protected characteristic	Housing needs / issues affecting this group
Race Black, Asian and Minority Ethnic (BAME) households	<p>BAME populations make up 40% of London’s population and are expected to grow further through natural growth and continued in-migration from overseas.</p> <p>Households from ethnic minority groups are disproportionately likely to become statutorily homeless, reflecting in part greater exposure to risk factors such as poverty, deprivation and overcrowding.</p> <p>60% of households accepted as homeless had BAME backgrounds in 2010/2011.</p> <p>For any given household size, overcrowding is higher in Black, Asian and minority ethnic households.</p>
Sex (gender) women	<p>Women’s employment rates in London are lower than men’s at 61.3% compared to 74.8%. There is also a pay gap of around 13% between men and women. This means that housing affordability may be a particular barrier affecting women, which may limit their housing options.</p> <p>Domestic violence can be a key factor in homelessness. Forced marriage and ‘honour’ based violence, trafficking and prostitution can lead to homelessness.</p> <p>49% of homelessness acceptances in 2010/2011 were single women with dependent children.</p>
Age - Children	<p>Child poverty rates after housing costs are higher in London than nationally, and much higher for those in social housing. Within London, child poverty is much higher among the Inner London boroughs. The rate of child poverty in Tower Hamlets is five times that of Richmond<sup>2</sup>.</p> <p>The child poverty rate is much higher for those living in social housing (61 per cent) and in private rented housing (57 per cent) than those living in owner occupied housing (20 per cent)</p> <p>There are 330,000 children living in working households experiencing poverty, up by 90,000 or 40% since the late 1990s. Of this rise, some 20,000 was in the last three years. By contrast, the number of children living in low-income workless families has dropped by 150,000 over the same period to 280,000<sup>3</sup>.</p>

<sup>2</sup> <http://www.londonpovertyprofile.org.uk/indicators/topics/income-poverty/> [Accessed 24/11/2011]

<sup>3</sup> <http://www.londonpovertyprofile.org.uk/indicators/topics/income-poverty/child-and-adult-poverty-and-work/> [Accessed 24/11/2011]



Equality protected characteristic	Housing needs / issues affecting this group
	<p>There are currently an estimated 240,000 households living in overcrowded accommodation in the capital and these households are likely to contain children and young people. In 2009/10, 8 per cent of households in London were overcrowded compared with 2 per cent nationally. Rates of overcrowding in the capital are highest in social rented housing.</p>
<p>Age - Children sharing other protected characteristics</p>	<p>Children in certain ethnic groups, those with lone parents (mostly women) and in households with at least one disabled adult are more likely to be living in poverty. The highest rates in London were for children in Pakistani and Bangladeshi households (64 per cent), and Black households (56 per cent).</p>
<p>Age - Older people</p>	<p>56 per cent of disabled children live in poverty and 54 per cent of children with at least one disabled adult, compared with 34 per cent of children in households with no disabled members.</p>
	<p>14% (over a million people) of London's population are over retirement age. Pensioner poverty rates after housing costs are higher in London than nationally. In 2005 – 08 there were an estimated 760,000 under-occupying households in the capital (with two or more bedrooms than required according to the bedroom standard). Many of these will be older households. 64,000 of these households live in social housing. Older people living in social housing or private rented accommodation (both 32 per cent) are twice as likely to be living in poverty than those in owner occupied housing (16 per cent)<sup>4</sup>.</p>
<p>Religion or belief</p>	<p>Families from some religious groups may need larger homes for large / multi-generation families.</p>
<p>Disability</p>	<p>There are over a million disabled people in the capital, just over half are older people. Many disabled and older people live in unsuitable homes that prevent them from living independent and dignified lives. Households with multiple specific needs are three times as likely to be living in unsuitable housing as those with no identified specific needs. Disabled people living in London are more likely to live in rented accommodation with 48.7% of disabled people compared to 41% non-disabled people living in rented accommodation. More than half (53.1%) of disabled people rent their accommodation from the local authority or council whereas non-disabled people are most likely to rent from other individual private landlords (46.3%).</p>
<p>Disability - Wheelchair users</p>	<p>Nearly a fifth of wheelchair user households in London have an unmet need for wheelchair accessible housing compared to a national average of 13 per cent. Despite the large number of wheelchair user households with unmet housing need, only 35 per cent of wheelchair user households who moved into social housing in London in 2009/10 moved into wheelchair accessible housing.</p>
<p>Disability - mental health - physical disability</p>	<p>In 2010/11, 8% of homelessness acceptances were due to physical disability &amp; 9% due to mental ill health</p>
<p>Sexual orientation -Lesbian, gay and bisexual people (LGB)</p>	<p>There is limited official information on the needs of LGB people. Research has shown that being LGB can be the direct cause of homelessness for young people. Homophobia can lead to young people being thrown out of home, or deciding to leave home. In addition, expectations of intolerance by young people or emotional and psychological difficulties in coming to terms with their sexual orientation, particularly in unsupportive environments, can cause</p>

<sup>4</sup> DWP, *Households below Average Income Reports*, April 2011

Equality protected characteristic	Housing needs / issues affecting this group
	homelessness. Nationally, 1 in 5 lesbian and gay people expected to be treated worse than heterosexuals when applying for social housing (2008 data based on email survey by Yougov). This could be due to homophobic attitudes or a lack of understanding of LGB issues.
Gender reassignment - people undergoing gender reassignment - trans-people	There is limited official information on the needs of trans-gender people. NHS records estimate that 5000-6000 people in the UK have undergone gender reassignment surgery (2008 data). Trans people were often reluctant to disclose their gender identity to housing officers because they feared insensitivity in the way they would be treated.
Pregnant women & women during 1 <sup>st</sup> six months following birth	12% of homelessness acceptances in 2010/11 were due to pregnancy. Pregnancy can contribute to overcrowding. Pregnancy and maternity may be a reason for mobility e.g. to move nearer to family / support networks. Social landlords may have different policies on allocation of different sized properties to pregnant women (for example only allocating 1 bed properties to pregnant women).

3.1.3

Table 3-2 summarises evidence regarding cycling trends in relation to equality protected characteristics housing needs amongst groups of people sharing protected characteristics, mainly drawn from Transport for London studies. The evidence is presented in relation to protected characteristics, as defined in the Equality Act 2010.

**Table 3-2: Summary of the cycling needs of groups sharing equality protected characteristics**

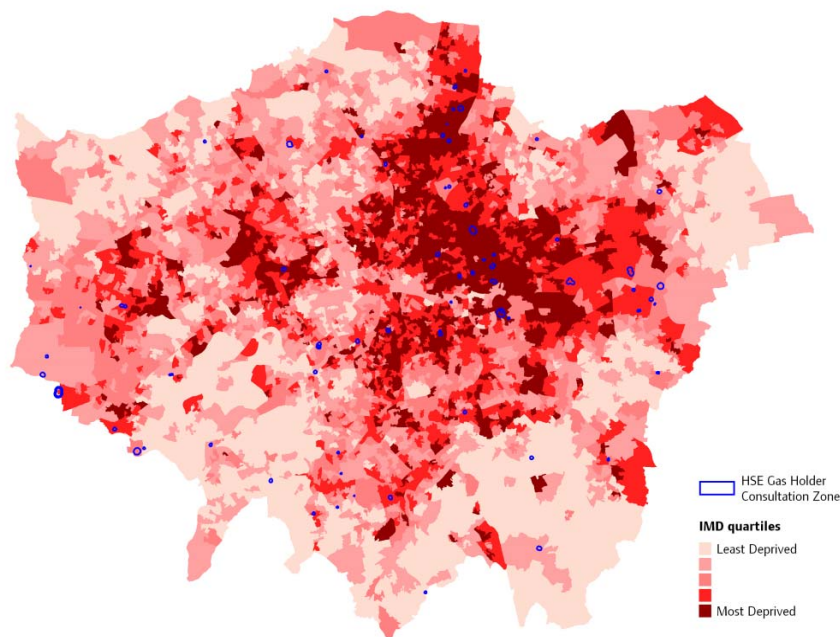
Equality protected characteristic	Housing needs / issues affecting this group
Race Black, Asian and Minority Ethnic (BAME) households	Higher rates of white people (14%) cycling frequently than other ethnic groups, with particularly low rates amongst people of Asian origin (6%) and Black people (9%)
Sex (gender) women	Two thirds of frequent cyclists (those who cycle once a week or more often) and more than half of infrequent cyclists in London are men. The proportion of men who cycle frequently is twice that of women (16 per cent compared to 8 per cent).
Age	Nearly 50% of frequent and infrequent cyclists in London are aged between 25 and 44. Only one in six frequent cyclists is over 45. Children under 14 are the age group most likely to cycle at least once a week.
Religion or belief	There is no reliable data on cycling rates based on religion or belief. It is considered unlikely that this gap in information will have an impact on the assessment of the impacts of the proposed policy change.
Disability	Three times higher rates of regular cycling amongst people without a disability (13%) than amongst people with a disability (4%), with similar differences in rates for occasional cycling

Equality protected characteristic	Housing needs / issues affecting this group
Sexual orientation -Lesbian, gay and bi-sexual people (LGB)	There is no reliable data on cycling rates based on sexual orientation. It is considered unlikely that this gap in information will have an impact on the assessment of the impacts of the proposed policy change.
Gender reassignment - people undergoing gender reassignment - trans-people	There is no reliable data on cycling rates based on gender reassignment. It is considered unlikely that this gap in information will have an impact on the assessment of the impacts of the proposed policy change.
Pregnant women & women during 1 <sup>st</sup> six months following birth	There is no reliable data on cycling rates based on pregnancy and maternity. It is considered unlikely that this gap in information will have an impact on the assessment of the impacts of the proposed policy change.

3.1.4

Map 1 illustrates the location of hazardous installations in relation to areas of deprivation in London. It shows that there are 21 sites within zones of most deprivation and 4 sites within the zones of least deprivation.

**Map 1: Locations of gasholder and hazardous installations sites in relation to zones of deprivation in London**



## 4 APPRAISAL OF IMPACTS

4.1.1 The appraisal is structured to reflect the three early alteration policy area in the London Plan:

- Affordable Housing and Rent
- Cycle Parking Standards
- Hazardous Substances and Installations

### 4.2 Affordable Housing

4.2.1 In supporting sustained delivery over the current investment round for significant volumes of new affordable housing, the early minor alterations are likely to benefit people sharing protected characteristics who are particularly disadvantaged by problems of overcrowding, homelessness and living in unsuitable housing. These groups include: children; Black, Bangladeshi, Pakistani and other ethnic minority households; single parent, mainly women-headed, households; as well as pensioner households. Households from certain faith communities, which have generally younger age profiles and hence tend to include more families with dependent children, may also particularly benefit. The early minor alterations are also likely to benefit low income households generally, through supporting an increased supply of affordable homes. These benefits are likely to vary according to where new housing is delivered.

4.2.2 Uncertainties regarding how households will respond to the introduction of Affordable Rent within the context of welfare cap reforms are relevant to how far the potential equality-related benefits of the increased volume of affordable housing will be realised.

4.2.3 In their responses to the draft of the EMALP which was published for consultation with statutory consultees, several stakeholders identify possible scenarios of how households may respond to the introduction of Affordable Rent in London, in combination with the welfare caps. These scenarios may particularly affect certain groups of people who share protected characteristics, as identified below:

- Households offered Affordable Rent housing in London may need to allocate a significant share of their income to housing costs. This scenario may result in increased rates of poverty after housing costs. Certain types of households may be disproportionately affected, though it is complex to predict how this will relate to protected characteristics. Where this affects households with disabled family members, they may find it particularly hard to cope due to the difficulty of foregoing other forms of expenditure without compromising their ability to participate fully in everyday life. Where it affects households with children, this may affect their ability to afford to

participate in activities which are generally considered part of a normal childhood.

- Some households may move to different parts of London or out of London in order to apply for affordable housing in cheaper areas. This may affect a number of groups with protected characteristics who rely on family networks for care and support.
- Some households may choose to remain in overcrowded private rental households, perpetuating or newly giving rise to overcrowding. This scenario may be particularly harmful for children and may disproportionately affect ethnic and faith groups who have younger age profiles and hence comprise many families with dependent children.

- 4.2.4 Both the early minor alterations and the revised LHS, which helps to support the implementation of the affordable housing policies in the London Plan, include important policies to enable flexibility in rent levels for Affordable Rent housing. These measures should minimise adverse equality impacts.
- 4.2.5 The early minor alterations to policy 3.12 promote a more balanced housing mix. Alterations to policy 3.12 prioritise on-site, then off-site provision for affordable housing, then off-site, with financial payments in lieu only accepted in exceptional circumstances. This may encourage the creation of communities which are mixed in terms of income and profile, thereby fostering good relations between different groups, including between people from different ethnic backgrounds. The early minor alterations emphasise prioritisation of family housing. This may contribute to addressing disadvantage experienced by children living in overcrowded housing, as well as extended (mainly Asian) families and older people who have moved in with family members. An increased supply of family housing is likely to contribute to more cohesive and sustainable communities. The early minor alterations enable relevant agencies to encourage and prioritise investment offers which cater for the particular needs of older people or disabled people, thereby addressing disadvantage experienced by these groups in accessing homes that are suited to their needs.

### 4.3 Summary

4.3.1 The early minor alterations concerning the definition and targets for delivery of affordable housing overall may benefit groups of Londoners with shared protected characteristics who experience higher rates of housing need, by enabling an increased supply of affordable homes due to greater certainty in delivery. This positive effect will be supported by the HCA/Mayor's investment decisions and measures in the revised LHS to mitigate potential problems of affordability. LHS mitigating policies include: enabling a range of rents charged, including some at target rent levels and policy to set rent levels within welfare cap limits. The benefits are likely to be unevenly distributed across London, reflecting opportunities for delivery of new affordable housing in different boroughs and the differing demographic profiles of boroughs.

### 4.4 Hazardous Substances and Installations

4.4.1 The policy seeks to ensure that developments take into account specific issues relating to the proximity to hazardous installations and that decommissioning of hazardous materials is funded.

4.4.2 As a result of the reference to a future potential SPG, developers are likely to be provided with greater certainty regarding the assessment process for development in proximity to hazardous installations.

4.4.3 The reference to a possible future SPG is likely to facilitate implementation of the policy wording, which notes that boroughs should, when assessing developments near hazardous installations, take account of site specific circumstances and proposed mitigation measures. The development of the proposed SPG offers an opportunity to provide advice on how to mitigate potential issues of mental health as well as physical health impacts, on how to take into consideration issues of deprivation and sensitivity of particular groups to potential impacts of developments located close to hazardous installations. This may prevent future developments exacerbating existing disadvantage and discrimination in areas near to hazardous installations.

- 4.4.4 Evidence shows that a large number of hazardous installations are in areas suffering the greatest deprivation. For example the existing baseline<sup>5</sup> (Table 4-1) shows the location of gas holders is significantly higher within zones of high deprivation compared to zones of least deprivation. Giving developers and decision makers the confidence to bring forward schemes, especially derelict sites near hazardous installations can improve a local area. Where they result in more homes and jobs for local people and improved amenity and services, this can improve the social, physical and economic conditions for local people. New homes would be provided in accordance with London Plan policies and deliver additional family and wheelchair housing and lifetime homes, benefitting families, children and disabled people. The development of a possible SPG provides an opportunity for developing guidance that helps minimise possible negative effects for equality (e.g. the worry and mental health effects of living near an installation) and, where possible, enhances opportunities to tackle existing deprivation and disadvantage.

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<sup>5</sup> EMALPEMALP IIA Scoping Report Addendum January 2012

**Table 4-1: Number of Gas Holders in each of the Quartiles of deprivation**

<b>Inner consultation Zone for Gas Holders</b>	
<b>IMD Rank 1 = most deprived</b>	<b>Gas Holders in IMD Quartile</b>
1	21
2	16
3	10
4	13
5	4
<b>Grand Total</b>	<b>64</b>



#### 4.5 Cycle Parking Standards

- 4.5.1 The Early Minor Alterations increase provision for cycle parking at business offices, student accommodation, and health centres and for visitors at a range of different use types.
- 4.5.2 In terms of protected characteristics, younger men, people from white ethnic backgrounds and younger working age people have higher rates of cycling. These same groups are likely to particularly benefit from the improved provision, as existing regular cyclists.
- 4.5.3 The alterations emphasise the importance of improving secure provision. By increasing provision and addressing concerns about security of provision, the revised standards may encourage increased uptake by women and people sharing other protected characteristics amongst office workers, students and health centre employees.
- 4.5.4 Improved visitor provision may be particularly valued by women who tend to make more frequent, shorter trips, which may involve visits to a number of use types. The increased provision may encourage women to switch to making more trips by cycle, motivated by health and financial considerations.
- 4.5.5 Thus although a significant share of the benefits may be enjoyed by white men from a relatively narrow age band, the increased provision may promote widened accessibility and uptake of cycling by other groups.
- 4.5.6 The Early Minor Alterations supporting text makes reference to London Cycling Design Standards (TfL 2005), which includes a small section on Disability Discrimination Act requirements, both to prevent cycle parking being a hazard or barrier to disabled people as well as to include consideration of parking for trikes or trailers used by disabled people. This provides some support for enabling disabled people to benefit from the improved cycle parking, though more explicit wording within the Early Minor Alterations text of the London Plan could strengthen improved provision of cycle parking suited to the needs of Deaf or disabled cyclists including wider bays, explanatory stickers and level access around a parking bay.

**5 ACRONYMS**

BAME	Black, Asian and Minority Ethnic
CLG	Department for Communities and Local Government
EHRC	Equalities and Human Rights Commission
EQIA	Equalities Impact Assessment
EMALP	Early Minor Alterations to the London Plan
GLA	Greater London Authority
HCA	Homes and Communities Agency
HESG	Housing Equalities Standing Group
HSE	Health and Safety Executive
IIA	Integrated Impact Assessment
IMD	Index of Multiple Deprivation
LGB	Lesbian, Gay and Bisexual
LGBT	Lesbian, Gay, Bisexual and Transgender
LHS	London Housing Strategy
NHS	National Health Service
NPPF	National Planning Policy Framework
SPG	Supplementary Planning Guidance
TfL	Transport for London
URS	Consultants commissioned to undertake EQIA