

# Equality Impact Assessment (EqIA) for London Plan Guidance

## 1 Overview

**London Plan Guidance name: Purpose-built Student Accommodation LPG**

**Stage: Consultation**

**Date of EqIA assessment: Last updated October 2024**

Please provide a brief outline of the guidance:

The Purpose-built Student Accommodation (PBSA) LPG sets out to smooth, and therefore increase the appropriate delivery of PBSA including Affordable Student Accommodation (ASA). It does so by clarifying policy expectations around mixed and inclusive neighbourhoods relating to location, mix of uses, housing mix and distribution and design and management, plus the practicalities of securing nominations agreements. It addresses current areas of inconsistency in interpretation, and causes of delays in the planning process, encouraging positive planning for need. It also seeks to address the balance with other planning considerations that relate to other types of housing need, recognising that over-concentration and dominance of PBSA can nonetheless be problematic if unmanaged.

Who is the guidance aimed at?

The primary audience is Planning Authorities and others involved in bringing forward proposals for PBSA, including developers, providers, funders and London-based Higher Education Providers (HEPs) with student housing need. The guidance is to help them best provide for student housing need as part of a wider approach to housing and regeneration.

What are the key issues to be aware of?

This EqIA takes a general approach, based on the assumption that PBSA is typically designed to meet the needs of predominantly single-person households studying full-time at London-based HEPs. However, the caveat is that this accommodation type has a unique purpose, meeting the varying needs of students, including significant communal social provision to foster social interaction, and is not required to meet housing standards. It should be noted that as the guidance has been revised post-consultation to reflect consultation responses, the assessment has been approached afresh, drawing on updated evidence. However, the original EqIA is available on the LPG webpage.

The draft guidance has been amended post-consultation to address concerns raised regarding the way some issues were described. This was felt to potentially have played to negative stereotypes of students, and ignored their own vulnerabilities related to their age and other protected characteristics. The language of the document has been reviewed throughout to ensure it is appropriately positive or neutral, and clarifications added to guidance on spaces open to the public as distinct from spaces for students and their guests. Additional detail has been provided regarding the consideration of the specific infrastructure needs of students, or students with needs relating to their religion or disability. This reflects consultation responses, as noted in the consultation report at appendix 1, rather than issues identified in the original EqIA

The draft guidance has also been amended to encourage appropriate management of flexible spaces and awareness-raising of wheelchair-accessible accommodation, and other inclusive design features. This should help to broaden the inclusivity of the accommodation provided in practice, and hence equality of opportunity. This reflects post-consultation amendments made to the large-scale purpose-built shared living LPG, which is a similar managed housing product.

Following the research and recommendations set out in a specific report on trans and non-binary student experiences, a suggested management response (provision and sensitive allocation of LGBTQ+ only cluster flats) has also been added. This should again help broaden equality of opportunity.

The level of wheelchair accessible and adaptable bedspaces recommended by the guidance has been reduced post consultation. This has been carefully considered in light of evidence regarding levels of limiting disability in the student population and typical age group, and is aligned with national good practice guidance. This level remains ambitious to offset under-provision in the private rental sector and provide certainty of provision and choice for disabled students. However, it is more aligned with need and market realities, recognising that there will be tradeoffs with other needs relevant to those with disabilities and other protected characteristics (e.g., ASA provision). In addition, the justification for seeking this level (which continues to be challenged) has been strengthened, with impact expected to be enhanced by the addition of the marketing expectation (referenced above) to improve awareness.

The PBSA sector continues to evolve. Therefore, it will remain important to be alive to any emergent issues not anticipated by the engagement and updated assessment to date. This is the role of ongoing monitoring and engagement.

**Which of the Public Sector Equality Duty (PSED) aims, 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).

Yes

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.

Yes

## 2 Assessment

List aspects of the guidance that might impact those with protected characteristics or other identified group(s)<sup>1</sup>

Table 1: Summary assessment of post-consultation revised guidance

Guidance key aspects, chapter headings, theme etc	Group(s) that could be impacted
Improved certainty/ consistency particularly relating to nominations agreements: will help increase delivery of PBSA and ASA, in turn alleviating pressures on the wider private rental sector (at the London-wide level).	Positive: All groups, especially younger people and students from groups disproportionately affected by low incomes, including people from a black and other minority ethnic group, single parent or disabled parent households, and those that are significantly reliant on the private rental sector (including certain ethnic groups, lone parent households, households affected by limiting health and disability, and families with dependent children).
Fostering mixed and inclusive neighbourhoods through avoiding over-concentration of PBSA and spreading the benefits	Positive: All groups, helping to ensure different housing needs are balanced across an area, and that neighbourhoods are overall more able to meet a range of needs.
Fostering mixed and inclusive neighbourhoods through the proposed mix of uses and other design integration	Positive: All groups who should be able to better meet their housing, employment and social infrastructure needs. Those groups particularly experiencing more fear and discomfort relating to violence and harassment in public spaces due to their protected characteristics should also particularly benefit from design advice seeking to make public spaces safer and more secure.

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<sup>1</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.

Guidance key aspects, chapter headings, theme etc	Group(s) that could be impacted
Fostering mixed and inclusive neighbourhoods through housing mix	Positive - ensures the needs of students with needs arising from their disability and/or those from low-income backgrounds (including relating to their protected characteristics such as race, single parent families) that are more reliant on ASA can exercise housing choice and live independently of their families, experiencing wider student life. Provides further guidance on balancing different needs considerations which should benefit groups adversely affected by imbalances in an area or delivery pipeline.
Fostering mixed and inclusive neighbourhoods through housing and place-making for inclusive well-being	Positive - Disabled people and religious groups requiring prayer/worship space. Highlights relevant design considerations, recognising that different students use their accommodation space in different ways, with different needs that should be met, avoiding conflict. Addressing well-being in this way should also particularly help students with or vulnerable to, mental health conditions.
Nominations agreements – proxy arrangements	Positive - Disabled people. May improve housing choice for students needing accessible student rooms if allocation is pooled via this mechanism.

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

## 2.1 Equality impacts, mitigating actions and justification

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

Evidence (including engagement)<sup>2</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, considerations is given to how these could be maximised.

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<sup>2</sup> See Appendix A and B

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

### **Potential positive impacts and scores**

The guidance should result in an appropriate increase in PBSA and ASA which should primarily benefit younger people, given the 18-21 group predominate in higher education student populations. This should improve their housing choice and well-being as derived from managed brand quality and predictable energy and other bills. In some cases, this may also alleviate household over-crowding for their families back home, improving the experience of remaining children. (Strong positive)

The indirect impact on the private rental sector, alleviating competition and upward pressures on rents may also benefit the housing choice and wider quality of life for some young people. (Positive)

ASA will likely have a positive impact for young people who face being disadvantaged by high student housing costs which can form a significant barrier to accessing higher education. This may be particularly relevant for those from backgrounds affected by other inequalities arising from protected characteristics resulting in low incomes (see below). (Positive)

Children, (particularly those from lone parent households who are significantly present in the private rental sector and more likely to be residing in temporary housing having been made homeless) will also benefit from the alleviation of private sector rent pressures. This benefit may also arise from addressing imbalances in housing-mix and delivery, which may have reduced choice for families in some areas. It can, in turn, contribute to neighbourhoods that are more mixed and inclusive, and address social exclusion and poverty. (Positive)

Older people may also benefit from the guidance on housing-mix considerations. This can help address imbalances at a neighbourhood level, and/or in delivery, that may otherwise have reduced their housing choice in some areas, particularly in relation to affordable housing. (Positive)

Guidance encouraging the design and curation of successful mixed-use, mixed-tenure inclusive neighbourhoods should also help address the housing, employment and social infrastructure needs of all Londoners (including older people). It can, in turn, help to promote a culture of equality and reduce poverty and social exclusion experienced by older people. (Positive)

More broadly, the guidance on integrating PBSA with the neighbourhood should help foster good relations between students and other residents. (Positive)

### **Potential neutral impacts and scores**

Older people are less likely to benefit from PBSA or alleviation in private rental pressures, though they are an increasing proportion of private renters so this may change over time. (Neutral)

There is nothing in the guidance that would prevent PBSA developments being designed and managed for students that have children, it is just not the typical business model for private providers. However, older students and those with families would be more likely to live in conventional housing, or in dedicated PBSA that best meets their needs, typically managed by the HEP. A least one Registered Provider is also known to be operating in this space providing access to affordable postgraduate housing. (Neutral)

The guidance advises that infrastructure impacts should be considered, and addressed, as part of ensuring the scale of the development does not adversely impact anyone's ability to access the local infrastructure they need. This should avoid any adverse impacts. (Neutral)

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

None identified

### **Relevant PSED aim(s)<sup>3</sup>**

- 2 (a)
- 2 (b)
- 2 (c)
- 3

## **Disability (including different types of physical, learning or mental disabilities)**

### **Potential positive impacts and scores**

The application of the housing mix and inclusive (building scale) design guidance should increase and improve provision for disabled students, including those with affordability needs. This should widen their housing choice; improve their ability to live away from home; choose a university/course best suited to their needs and career plans; better enable them to socialise with other students; and provide other benefits of living in and visiting PBSA. Improved housing choice may also be a benefit of the pooling of specialist adapted rooms as could be enabled by the proxy arrangements highlighted for consideration.. The guidance that seeks awareness-raising through marketing of inclusive design features to broaden the demographic reach of the accommodation should also help reinforce these benefits. (Strong positive)

Guidance on design for inclusive should improve the health and well-being of all students, and may particularly benefit those with mental health conditions. Better availability of PBSA may also enable students with particular mental health needs to better access

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<sup>3</sup> See Appendix C for the PSED aims

support compared to living in the private rental sector, which can affect continuation, progression and achievement in higher education. (Positive)

Considering resident and visitor needs in the provision of communal facilities should enable social interaction between people with different characteristics. In this way it should improve social inclusion and foster mutual understanding. (Positive)

Disabled people may experience harassment in public spaces. The guidance encourages activation and surveillance of through routes and other public spaces and collaborative efforts to address community safety and well-being. This should help address vulnerability and help disabled people feel safer and more secure in public spaces. (Positive)

The indirect impacts on the private rental sector, alleviating competition and upward pressures on rents may also benefit the housing choice and wider quality of life for disabled people – given households affected by health and disability deprivation are significantly present in the private rental sector. (Positive)

Disabled people may also benefit from the guidance on housing-mix considerations that can help address imbalances at a neighbourhood level, and/or in delivery, that may otherwise have reduced their housing choice in some areas. They may also benefit from the guidance regarding quality design that should help PBSA proposals contribute positively to wider neighbourhood inclusivity and activity in terms of access and ability to meet different life needs. This should help to reduce social inclusion and foster good relations between different groups in the community. (Positive)

### **Potential neutral impacts and scores**

The guidance advises that infrastructure impacts should be considered, and addressed, as part of ensuring the scale of the development does not adversely impact anyone's ability to access the local infrastructure they need. This should avoid any adverse impacts. (Neutral)

While the recommended proportion of wheelchair accessible and adaptable units has been reduced compared with the consultation draft, this is consistent with national good practice guidance, and levels of limiting disability in the student population. This should still provide for improved choice, (relative to a situation where none is sought) while also enabling other housing needs to be met that may benefit other disabled students. This recognises the tradeoffs in viability terms between for instance, wheelchair accessible room numbers and ASA room numbers. (Neutral)

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

No impacts identified.

### **Relevant PSED aim(s)**

- 1
- 2(a)
- 2 (b)
- 2 (c )
- 3

## Gender reassignment

### Potential positive impacts and scores

Those undergoing gender reassignment may experience harassment in public spaces. Trans people in particular are more likely to experience threats of physical or sexual harassment or violence. The guidance encourages activation and surveillance of through routes and other public spaces and collaborative efforts to address community safety and well-being. This should help address vulnerability and help people feel safer and more secure in public spaces. (Positive)

Being able to access PBSA may also better enable students undergoing gender reassignment to access support relevant to their needs (e.g., relating to their mental health, social networks) compared with living in the private rental sector. This may in turn affect their higher education continuation and achievement. (Positive)

Guidance suggesting provision and sensitive allocation of LGBTQ+ only rooms should help address some of the well-being issues experienced by those transitioning or who have undergone gender re-assignment. Research has identified that such people may wish to have spaces of retreat amongst those that share their protected characteristics or the wider LBGQT community. It is recognised however, that this should be balanced with communal spaces open to all, and not all such students will want to pursue this separation, and that there are also benefits of interaction (see below). (Positive)

Considering resident and visitor needs in the provision of communal facilities should enable social interaction between people with different characteristics. In this way it should improve social inclusion and foster mutual understanding. (Positive)

Guidance regarding design and curation of successful mixed-use inclusive neighbourhoods, through the design and management of PBSA, will help address the employment and social infrastructure needs of all Londoners. This in turn should help to promote a culture of equality and reduce poverty and social exclusion, which disproportionately affect some trans people. (Positive)

### Potential neutral impacts and scores

The guidance advises that infrastructure impacts should be considered, and addressed, as part of ensuring the scale of the development does not adversely impact anyone's ability to access the local infrastructure they need. This should avoid any adverse impacts. (Neutral)

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

No impacts identified.

### Relevant PSED aim(s)

- 1
- 2a/b/c
- 3

## Marriage and civil partnership

### Potential positive impacts and scores

No impacts identified.



### **Potential neutral impacts and scores**

There is nothing in the guidance that would prevent PBSA being designed and managed for students that are married. Indeed, some providers allow dual occupancy of some of their rooms, which would be available to couples, married or unmarried, improving their housing choice. This is reinforced by guidance that management plans should include appropriate marketing provision that improves awareness of inclusive design features (which may include larger rooms). (Neutral)

The guidance advises that infrastructure impacts should be considered, and addressed, as part of ensuring the scale of the development does not adversely impact anyone's ability to access the local infrastructure they need. This should avoid any adverse impacts. (Neutral)

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

No impacts identified.

### **Relevant PSED aim(s)**

NA

## **Pregnancy and maternity**

### **Potential positive impacts and scores**

Inclusive design and management guidance, particularly relating to external public realm and internal/external communal spaces, considering resident and visitor needs, should benefit all. This includes those with pregnancy and maternity-related mobility impairments and particular access needs (e.g., related to pram/pushchair use). (Positive)

Guidance regarding design and curation of successful mixed-use inclusive neighbourhoods, through the design and management of PBSA, will help address the employment and social infrastructure needs of all Londoners. This in turn should help to promote a culture of equality and reduce poverty and social exclusion, which disproportionately affect some women. (Positive)

### **Potential neutral impacts and scores**

There is nothing in the guidance that would prevent particular PBSA developments being designed and managed for students that are pregnant or have children, it is just not the typical business model for private providers. However, older students and those with families would be more likely to live in conventional housing, or in dedicated PBSA that best meets their needs, typically managed by the HEP. A least one Registered Provider is also known to be operating in this space providing access to affordable postgraduate housing. (Neutral)

The guidance advises that infrastructure impacts should be considered, and addressed, as part of ensuring the scale of the development does not adversely impact anyone's ability to access the local infrastructure they need. This should avoid any adverse impacts. (Neutral)

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

No impacts identified.

## Relevant PSED aim(s)

- 2 (a)
- 2 (b)

## Race

### Potential positive impacts and scores

Greater delivery of ASA could particularly benefit students from Black, Asian and Minority Ethnic backgrounds. This reflects that such households disproportionately live in poverty and overcrowded conditions, so such students could, through better access to ASA, improve their quality of accommodation with health and other well-being benefits. This could also help address barriers to such students accessing higher education, and open up the opportunities brought about by this and living away from home. (Positive)

Increased supply of managed, quality PBSA will particularly benefit international students from diverse racial backgrounds. These include students from India and parts of Africa (such as Nigeria) as well as China who make up an increasing proportion of the international student intake. These are groups that may experience discrimination and exploitation in the private sector housing market given their unfamiliarity with the British legal system and language barriers. Therefore, it will likely improve their housing choice and quality, and overall experience, with health and well-being benefits. (Strong positive)

Considering resident and visitor needs in the provision of communal facilities should enable social interaction between people with different characteristics. In this way it should improve social inclusion and foster mutual understanding. (Positive)

Increased PBSA and its potential to alleviate pressures on the private rental sector that push rents upwards and increase competition for housing will likely benefit, in particular, ethnic groups that disproportionately rely on this tenure to meet their housing needs. In London this is non-British White and Chinese groups. Black, Asian and Minority Ethnic groups are disproportionately affected by homelessness which will in part due to unaffordable rent increases, and these groups may also benefit from this mechanism. (Positive)

People from Black, Asian and Minority Ethnic backgrounds may benefit from the guidance on housing-mix considerations that can help address imbalances at a neighbourhood level, and/or in delivery, that may otherwise have reduced their housing choice in some areas. This may be particularly relevant in respect of C3 affordable housing which some Black, Asian and Minority Ethnic groups are more in need of given ongoing labour market inequalities and other impacts of discrimination. (Positive)

Guidance helping to foster the design and curation of successful mixed-use inclusive neighbourhoods will help address the employment and social infrastructure needs of all Londoners. This should in turn help to promote a culture of equality, and reduce poverty and social exclusion that disproportionately affect some ethnic groups, helping to foster good relations within the neighbourhood. (Positive)

People from Black, Asian and Minority Ethnic backgrounds may experience harassment in public spaces. The guidance encourages activation and surveillance of through routes and other public spaces and collaborative efforts to address community safety and well-being.

This should help address vulnerability and help people feel safer and more secure in public spaces. (Positive)

### **Potential neutral impacts and scores**

The guidance advises that infrastructure impacts should be considered, and addressed, as part of ensuring the scale of the development does not adversely impact anyone's ability to access the local infrastructure they need. This should avoid any adverse impacts. (Neutral)

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

No impacts identified.

### **Relevant PSED aim(s)**

- 1
- 2 (a)
- 2 (b)
- 2 (c)
- 3

## **Religion or belief**

### **Potential positive impacts and scores**

To the extent that households holding certain religious beliefs belong disproportionately to Black, Asian and Minority Ethnic groups, they are likely to experience similar impacts to those identified for people with these ethnic backgrounds. (Positive)

Inclusive design guidance within the document encourages consideration of students' worship needs and other religious practices (e.g., relating to cooking/food storage) in the design and management of spaces. This should benefit those for whom such religious practice in or close to their place of residence is important. The guidance suggesting that a management plan includes details of marketing to raise awareness of inclusive design features to broaden the demographic reach of the accommodation, should also help reinforce this. (Positive)

Considering resident and visitor needs in the provision of communal facilities should enable social interaction between people with different characteristics. In this way it should improve social inclusion and foster mutual understanding. (Positive)

Guidance regarding design and curation of successful mixed-use inclusive neighbourhoods, through the design and management of LSPBSL, will help address the employment and social infrastructure needs of all Londoners. This in turn should help to promote a culture of equality and reduce poverty and social exclusion, which disproportionately affect some communities. (Positive)

### **Potential neutral impacts and scores**

The guidance advises that infrastructure impacts should be considered, and addressed, as part of ensuring the scale of the development does not adversely impact anyone's ability to access the local infrastructure they need. This should avoid any adverse impacts. (Neutral)

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

No impacts identified.

## Relevant PSED aim(s)

- 1
- 2 (a)
- 2 (b)
- 2 (c)
- 3

## Sex

### Potential positive impacts and scores

Women may experience harassment and other threats in public spaces. The guidance encourages activation and surveillance of through routes and other public spaces and collaborative efforts to address community safety and well-being. This should help address vulnerability and help women feel safer and more secure in public spaces. (Positive)

Women may also benefit from the alleviation of private sector rent pressures given the gender pay gap, and particularly if lone parents. Female-headed lone parent households are more likely to be residing in temporary housing having been made homeless, often due to rising private sector rents. (Positive)

This benefit may also arise from guidance addressing imbalances in housing mix and delivery, which may have reduced choice in some areas. This may be particularly relevant in respect of C3 affordable housing which some women are more in need of given women are more likely to be economically inactive, low paid, and/or subject to the poverty that affects single parent families. This should contribute to neighbourhoods that are more mixed and inclusive, and address social exclusion and poverty. (Positive)

Guidance helping to foster the design and curation of successful mixed-use inclusive neighbourhoods will help address the employment and social infrastructure needs of all Londoners and in turn help to promote a culture of equality, and reduce poverty and social exclusion that disproportionately affect some women. (Positive)

### Potential neutral impacts and scores

The guidance advises that infrastructure impacts should be considered, and addressed, as part of ensuring the scale of the development does not adversely impact anyone's ability to access the local infrastructure they need. This should avoid any adverse impacts. (Neutral)

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

No impacts identified.

## Relevant PSED aim(s)

- 1
- 2 (a)
- 3

## **Sexual orientation**

### **Potential positive impacts and scores**

Those who are LGBTQ+ may be more likely to experience harassment in public spaces. The guidance encourages activation and surveillance of through routes and other public spaces and collaborative efforts to address community safety and well-being. This should help address vulnerability and help people feel safer and more secure in public spaces. (Positive)

Being able to access PBSA may also better enable LGBTQ+ students to access support and community relevant to their needs (such as higher rates of poor mental health and family estrangement) compared with living in the private rental sector. This may in turn affect their higher education continuation, progression and achievement. (Positive)

Guidance suggesting provision and sensitive allocation of LGBTQ+ only rooms should help address some of the well-being issues experienced by such students who may wish to have spaces of retreat amongst the LGBTQ+ community. It is recognised however, that this should be balanced with communal spaces open to all, and not all such students will want to pursue this separation, and that there are also benefits of interaction (see below). (Positive)

Considering resident and visitor needs in the provision of communal facilities should enable social interaction between people with different characteristics. In this way, it should improve social inclusion and foster mutual understanding. (Positive)

Guidance regarding design and curation of successful mixed-use inclusive neighbourhoods, through the design and management of PBSA, will help address the employment and social infrastructure needs of all Londoners. (Positive)

### **Potential neutral impacts and scores**

The guidance advises that infrastructure impacts should be considered, and addressed, as part of ensuring the scale of the development does not adversely impact anyone's ability to access the local infrastructure they need. This should avoid any adverse impacts. (Neutral)

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

No impacts identified.

### **Relevant PSED aim(s)**

- 1
- 2 (b)
- 3

## People on low incomes<sup>4</sup>

### Potential positive impacts and scores

Students from low-income backgrounds are likely to benefit from increased access to ASA and the impact this may have on wider access to opportunity brought about by being able to live away from their family home and access the higher education course of their choice. This may also help them stay on their course and attain higher levels of achievement by reducing cost pressures. (Strong positive)

Low-income groups may also benefit from the indirect impact of alleviating of pressures on the private rental sector where many are concentrated and where many are particularly vulnerable to homelessness given their income situation and ongoing increases to rents. (Positive)

People from low-income backgrounds may also benefit from the guidance on housing-mix considerations that can help address imbalances at a neighbourhood level, and/or in delivery, that may otherwise have reduced their housing choice in some areas. This may be particularly relevant in respect of C3 affordable housing, which some low-income groups are more in need of. (Positive)

Guidance helping to foster the design and curation of successful mixed-use inclusive neighbourhoods will help address the employment and social infrastructure needs of all Londoners. This should in turn help to promote a culture of equality, and reduce poverty and social exclusion arising from income status. (Positive)

### Potential neutral impacts and scores

The guidance advises that infrastructure impacts should be considered, and addressed, as part of ensuring the scale of the development does not adversely impact anyone's ability to access the local infrastructure they need. This should avoid any adverse impacts. (Neutral)

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

No impacts identified.

### Relevant PSED aim(s)

- 2(a)
- 2 (c)
- 3

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<sup>4</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**

People with vulnerabilities including refugees and asylum seekers are identified as disproportionately housed in the private rental sector, and in the lowest income third. Therefore these groups may benefit from more PBSA that indirectly alleviates pressure on the private rental sector. This may help address upward pressure on rents and competition that affects people's disposable income and propensity to homelessness. (Positive)

Insofar as carers, refugees, care leavers, homeless people and rough sleepers, and ex-offenders are all groups that are more likely to fall into low-income brackets or experience difficulties with housing and workspace costs, the guidance could have positive effects. Provision of ASA may benefit students from these groups who may otherwise not be able to afford to go to university with the benefits this brings. (Positive)

Being able to access PBSA also may enable those students to be better supported with their particular needs than in the wider private rental sector, with potential impacts on continuation and achievement. (Positive)

Similarly, advising of housing-mix considerations can help address imbalances at a neighbourhood level, and/or in delivery, that may otherwise have reduced the housing choice in some areas. This may be particularly relevant in respect of C3 affordable housing, which many of these groups should be able to benefit from - given their priority status on council housing waiting lists. (Positive)

More generally, guidance helping to foster the design and curation of successful mixed-use, mixed tenure inclusive neighbourhoods, will help address the housing, employment and social infrastructure needs of all Londoners. This should in turn help to promote a culture of equality and good community relations, and reduce poverty and social exclusion. (Positive)

### **Potential neutral impacts and scores**

The guidance advises that infrastructure impacts should be considered, and addressed, as part of ensuring the scale of the development does not adversely impact anyone's ability to access the local infrastructure they need. This should avoid any adverse impacts. (Neutral)

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

No impacts identified.

### **Relevant PSED aim(s)**

- 1
- 2 (a)
- 2 (b)
- 2 (c)
- 3

## 2.2 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	Yes	Yes	-	-	-
Disability	Yes	Yes	Yes	-	-	-
Gender reassignment	-	Yes	Yes	-	-	-
Marriage and civil partnership	-	-	Yes	-	-	-
Pregnancy and maternity	-	-	Yes	-	-	-
Race	Yes	Yes	Yes	-	-	-
Religion and belief	-	Yes	Yes	-	-	-
Sex	-	Yes	Yes	-	-	-
Sexual orientation	-	Yes	Yes	-	-	-
People on low incomes	Yes	Yes	Yes	-	-	-
Other groups	-	Yes	Yes	-	-	-

### Cumulative impacts

Cumulative, aggregate and in-combination impacts have been considered; and, where relevant, seem generally likely to reinforce positive benefits. For instance, the combination of design and management features, and marketing material that highlights these is likely to raise awareness of them amongst those that may benefit from them, perhaps encouraging more take-up of the opportunities presented.



### 3 Amendments

No further changes made due to overall positive impacts. However, note the amendments highlighted in the introduction that have addressed equalities concerns raised in the consultation.

### 4 Recommendation

**The EqlA of this draft guidance proposed for publication (which has been updated post-consultation)** has not identified any potential for discrimination or negative impact, and all opportunities to advance equality have been taken. As such officers recommend that the guidance can be published in its proposed form.

### 5 Monitoring

Monitoring will take place through the London Plan Annual Monitoring Report and wider monitoring of the Mayor's other strategies, as well as part of reviewing the London Plan. The evidence base on student housing need (including composition by group characteristic) will continue to be developed and further help to identify and monitor relevant trends.

## 6 Appendix A: Evidence Reference and Content

### 6.1 Evidence

#### Age

In terms of student affordability, the average annual rent of a room in London takes up 88 per cent of the maximum loan amount<sup>5</sup>.

Most students in England are under 24 (38 per cent are under 20, and a further 28 per cent are 20-24)<sup>6</sup>

Young people are more likely to be unemployed than adults aged between 25 and 64<sup>7</sup>.

Younger Londoners face higher housing costs than older groups: those aged 16-49 spend an average of 29 per cent of their net income on housing costs, compared to 24 per cent for those aged 50-64 and 17 per cent for those aged 65 or more<sup>8</sup>.

Rates of overcrowding are higher in London than anywhere else in the country. Households with children are more likely to be overcrowded than households with no children. In London, 26 per cent of all households with dependent children are considered overcrowded, according to the bedroom standard measure, compared to 4.2 per cent of households without dependent children<sup>9</sup>

In March 2024 there were 65280 homeless households living in temporary accommodation arranged by London boroughs, including 86810 children<sup>10</sup>. Households with dependent children comprise one third of all households accepted as statutorily homeless, and 22 per cent of such households are female headed<sup>11</sup>.

Under 24s are now less likely than previously to live in the private rental sector; and are more likely to still live at home due to rising costs. Older people are an increasing proportion of private renters<sup>12</sup>.

A higher proportion of older Household Reference Persons aged 65 and over own, rather than rent, their home (67 per cent with 33 per cent); though 25 per cent live in social rented housing<sup>13</sup>.

#### Disability

16 per cent of students enrolled in England have a known disability<sup>14</sup>. Engagement with PBSA providers and HEPs has found that they note this is primarily neurological (such as dyslexia) and mental health related.

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<sup>5</sup> Unipol [Unipol \[triennial\] Accommodation Costs Survey 2021/22](#)

<sup>6</sup> HESA [HE enrolments data for 2021/2](#) (2022/23 data not yet available)

<sup>7</sup> ONS [Unemployment numbers and rates by equalities group LFS](#), London Datastore April 2024

<sup>8</sup> Resolution Foundation, [Intergenerational audit for the UK: Data dashboard, 2020](#)

<sup>9</sup> ONS, [Census 2021: Household Composition Occupancy Rating by region](#)

<sup>10</sup> MHCLG (2024) Live Homelessness Tables, [quarterly release](#), table TA1

<sup>11</sup> MHCLG (2024) Live Homelessness Tables, [annual release](#), table A5R

<sup>12</sup> [UK private rented sector data \(2018\)](#).

<sup>13</sup> ONS, [Census 2021: Household composition, occupancy rating for bedrooms and tenure of household](#)

<sup>14</sup> [HESA HE enrolment stats 2021/22](#).

13.2 per cent of 20-24 year olds and 11.3 per cent of 15-19 year olds have a disability, and 3.9 per cent of both these age groups have a disability that limits them a lot (wheelchair users are more likely to fall within this category)<sup>15</sup>. In London, the proportion of population aged 20-24 that has a disability is 10 per cent, (8.5 per cent for 15-19 year olds) and 2.9 per cent (3 per cent for 15-19 year olds) have a disability that limits them a lot<sup>16</sup>.

The Office for Students identifies that disabled students are more likely to experience cost pressure; lack of choice of institution/course; and lack of wider higher education 'capacity' (e.g., suitable housing). This affects their access to higher education, continuation, progression and achievement<sup>17</sup>.

Disabled people are more likely to live in the social rented sector compared with their non-disabled counterparts:

- Nearly 1 in 4 (24.9 per cent) disabled people aged 16 to 64 years in the UK rent social housing compared with fewer than 1 in 10 (7.9 per cent) non-disabled people<sup>18</sup>,
- In London this proportion rises to nearly 1 in 3 (30 per cent)<sup>19</sup>

The proportion of disabled people living with parents rose from 12.4 per cent in 2013/14 to 16.4 per cent in 2020/21. By contrast, the proportion of non-disabled people living with parents was more or less unchanged (up 1 per cent from 18.2 per cent in 2013/14 to 19.2 per cent in 2020/21)<sup>20</sup>.

Households in London where at least one member uses a wheelchair some or all of the time are more likely to be dissatisfied with their accommodation than households where no one uses a wheelchair.<sup>20</sup>

Deaf and disabled residents 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>21</sup>.

## Gender reassignment

The Office for Students notes that students that report that their gender identity is not the same as their sex registered at birth are more likely to experience mental ill health<sup>22</sup> which may affect their continuation, progression and achievement in higher education.

Research by HEPI<sup>23</sup> found that trans and non-binary students face multiple financial challenges related to their protected characteristics and higher levels of loneliness and other challenges to their well-being than other students.

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<sup>15</sup> ONS [Disability in England and Wales, 2021](#) Table 2

<sup>16</sup> ONS [Disability in England and Wales, 2021](#) ONS, Table 4

<sup>17</sup> Office for Students [Equality of Opportunity Risk Register](#) undated

<sup>18</sup> ONS [Outcomes for disabled people in the UK 2021](#)

<sup>19</sup> ONS [Table 6: Housing Situation of people aged 16 to 64 by disability status and English region](#), Disability and Housing UK 2021

<sup>20</sup> ONS, [Table 6: Housing Situation of people aged 16 to 64 by disability status and English region](#), 2021

<sup>21</sup> GLA analysis of Households Below Average Income data (End User dataset) quoted in EqIA of the Affordable Homes Programme, (2021-26)).

<sup>22</sup> Office for Students [Equality of Opportunity Risk Register](#) undated

<sup>23</sup> HEPI [Trans-and-non-binary-student-experiences-in-higher-education.pdf \(hepi.ac.uk\)](#) 2024

Stonewall research in 2018 found that 25 per cent of trans/non-binary survey respondents were discriminated against when looking for a house or flat to rent or buy in the previous year. In the survey, 20 per cent reported that they had experienced discrimination while looking for a new home<sup>24</sup>.

In 2022/2023, 4732 Hate crimes against transgender people were recorded by the Police, an increase of 11 per cent from the previous year<sup>25</sup>. This number considered to be underreported (out of 108,100 responses to the National LGBT Survey, 88 per cent of transgender people said they did not report the most serious type of incident). Transgender people are more likely to experience threats of physical or sexual harassment or violence compared with the LGBT community as a whole.<sup>26</sup>

## **Marriage or civil partnership**

No relevant data

## **Pregnancy and maternity**

No relevant data

## **Race**

The Office for Students identifies that students from some Black, Asian and Minority Ethnic group backgrounds are less likely to access higher education, and students from mixed ethnic backgrounds are more likely to experience mental ill health that may affect their continuation, progression and achievement in higher education<sup>27</sup>.

The number of domestic compared to international students enrolled in higher education in the UK in the academic year 2022/23 is as follows<sup>28</sup>:

- UK students: 2,175,530 (74 per cent)
- EU students: 95,505 (3 per cent)
- Students from beyond the EU: 663,355 (23 per cent)

In London, most EU students are from France, Ireland, Italy, Spain and Germany; and most Non-EU international students are from China, India and Nigeria.

On average, Black Londoners and those from most other minority ethnic groups experience worse housing conditions, less tenure security, higher rates of housing need, worse affordability and lower wealth than White Londoners.

39 per cent of Black, Asian and Minority Ethnic group Londoners live in relative poverty after housing costs, compared to 21 per cent of White Londoners<sup>29</sup>

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<sup>24</sup> Stonewall, [LGBT in Britain – Trans Report](#), 2018

<sup>25</sup> Home Office (2023) [Hate Crime in England and Wales](#), 2<sup>nd</sup> edition (annual release)

<sup>26</sup> Government Equalities Office [National LGBT Survey Research Report](#) 2019

<sup>27</sup> Office for Students [Glossary entry for Underrepresented groups](#) undated

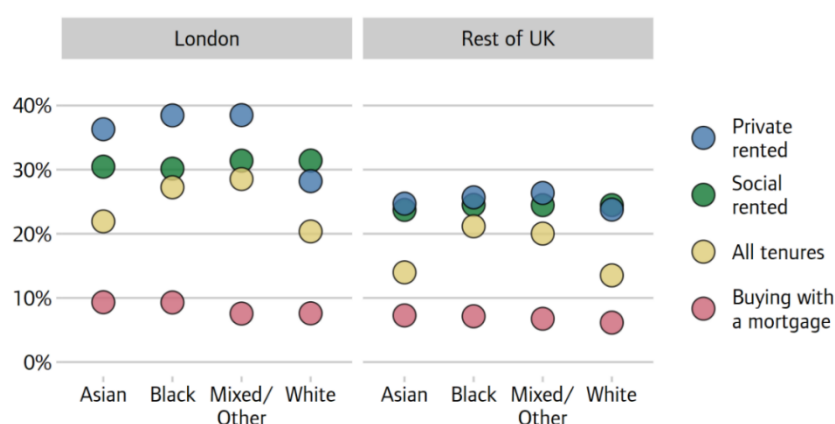
<sup>28</sup> HESA [Where do HE students come from?](#) 2023

<sup>29</sup> GLA analysis of Households Below Average Income data (End User dataset), Homes for Londoners: Affordable Homes Programme 2021-2026 Equality Impact Assessment)

2023 surveys found that Londoners from a Black or Asian ethnic background were more likely than people from White, other or mixed ethnicity backgrounds to have struggled to meet housing payments in the last six months. They were also less confident about meeting them without a struggle in the next six months<sup>30</sup>

The poverty rate in London, after housing costs, was 38 per cent for Black households, and 33 per cent for Asian households, compared to 18 per cent for White household. For single parents it was 47 per cent. Poverty rates also varied significantly across London's boroughs.<sup>31</sup>

So whilst there is a problem of relative low income (household income before housing costs) in populations with a Black, Asian and mixed/other minority ethnic background, these groups are also more affected by London's high housing costs than White Londoners, as illustrated in the chart below. This particularly shows the issue within the private rental sector, (where students are more likely to reside) and the insulating effect of home ownership.<sup>32</sup>



Median of housing costs as a proportion of household income, London and rest of UK 2015-16 to 2019-20. Source: Households Below Average Income

Black households in London are significantly more likely than those of other ethnicities to report moving because their landlord ended the tenancy or evicted them. They are also more likely to say they expect to be treated worse by private landlords than people of other races<sup>33</sup>.

Households headed by someone who is Black are around 150 per cent more likely to be owed a homelessness duty.<sup>34</sup> 1.6 per cent of all householders in London were assessed as owed a homelessness duty in London in 2019- 20, but this rate varies enormously by ethnicity – from less than one in every 1,000 for Chinese, Indian and White British households to four or five in every 100 for Black and Mixed ethnicity households. 17 per cent of Black households living in private rented or social housing in London say they have

<sup>30</sup> GLA, [Housing in London 2023](#), October 2023

<sup>31</sup> Trust for London, [Who is in poverty in London?](#), 21 July 2023 (using 2021-22 data)

<sup>32</sup> GLA, [Housing and race equality in London: An analysis of secondary data](#), March 2022

<sup>33</sup> GLA, [Housing and race equality in London: An analysis of secondary data](#), March 2022 (using English Housing Survey 2014-18)

<sup>34</sup> GLA Housing and Land, [Housing in London 2023](#), October 2023

been homeless at some point in their lives, compared to 8 per cent of Asian households, 6 per cent of White households and 9 per cent of mixed/other ethnic minority households<sup>35</sup>.

Households that were not from a White British ethnic background in the three years to 2021 were 60 per cent more likely to be overcrowded than the London average.<sup>33</sup> More specifically, Londoners from Bangladeshi and Black African backgrounds were among those most likely to say they are living in crowded homes<sup>36</sup>.

English Housing Survey data (2015-17) shows that, in every ethnic group, private renters were the most likely to live in homes below the decent homes standard; and Black and Asian households in private rented housing were particularly likely to live in 'non-decent' homes<sup>37</sup>.

## Religion or belief

To the extent that Londoners holding particular religious beliefs belong disproportionately to Black, Asian and Minority Ethnic groups (Census 2021), the relevant data overlaps.

There has been limited data releases with the breakdown in relation to housing statistics, but people of Muslim faith are disproportionately likely to be homeless (19 per cent of homeless people are Muslim, compared to 15 per cent of the population)<sup>38</sup>. This is also the case with housing deprivation more generally, which shows 35 per cent of Muslim-only households are deprived in one or more domain (over-crowding, no central heating, shared dwelling) compared to an average of 17 per cent for all other households with any other single religion or no religion<sup>39</sup>.

## Sex

71 per cent of women surveyed for a report by the All-Party Parliamentary Group for UN Women stated that they had experienced some form of sexual harassment in a public space, and among 18-24 years olds, the figure was even higher at 86 per cent<sup>40</sup>.

Female-headed lone-parent households in London comprise 22 per cent of all households accepted as statutory homelessness in 2022-23 (compared to 2 per cent of male-headed lone-parent households). Single males comprise 38 per cent per cent of households assessed as owed a duty<sup>41</sup>.

The London Housing Committee found that the gender pay gap means women earning a median income need to spend 63 per cent of their earnings to afford the median private rent in London, compared to 49 per cent for men<sup>42</sup>. This means upward pressures on private rents make them ever more unaffordable for women.

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<sup>35</sup> GLA, [Housing and race equality in London: An analysis of secondary data](#), March 2022 (using data from the English Housing Survey and the DLUHC)

<sup>36</sup> GLA, [Housing in London 2022](#), October 2022 (from 2021-22 London survey data).

<sup>37</sup> GLA Housing and Land, [Housing and race equality in London: An analysis of secondary data](#), March 2022

<sup>38</sup> ONS, [People experiencing homelessness, England and Wales: Census 2021 – Ethnic group, national identity, language and religion tables](#), 6 December 2023

<sup>39</sup> ONS, [Census 2021: Combination of religions in household and household deprived in the housing dimension](#)

<sup>40</sup> APGG for UN Women (2021) [Prevalence and reporting of sexual harassment in UK public spaces](#)

<sup>41</sup> DLUHC, [Tables on homelessness](#), last updated 30 November 2023 (annual release)

<sup>42</sup> London Housing Committee [Women and Housing: a gap in the market](#), 2023

## Sexual orientation

The Office for Students identifies that LBQT+ students are more likely to experience mental ill health, which may affect their higher education continuation, progression and achievement<sup>43</sup>.

In 2022-23, the police recorded 24 102 hate crimes related to sexual orientation across England and Wales<sup>44</sup>. Over two-thirds of same-sex couples have modified their behaviour in public towards their partner (for example, avoided hand-holding) for fear of hate crime<sup>45</sup>.

## People on low incomes

The Office for Students identifies that people from low-income backgrounds are less likely to access higher education, and students from this background are more likely to experience a lack of choice of course, cost pressures and mental ill health which may also affect continuation, progression and achievement<sup>46</sup>

The proportion of Londoners saying they were 'financially struggling' increased from 12 per cent in January 2022 to 17 per cent in January 2023, a level which was sustained into January 2024. In January 2024, 51 per cent of Londoners said they struggled to pay for food and essential items, up from 39 per cent in January 2022.<sup>47</sup> Londoners living in social rented accommodation, (49 per cent) followed by those in private rented accommodation (34 per cent) are most likely to live in poverty, though a greater and increasing proportion of Londoners in poverty are now private renters (40 per cent) <sup>48</sup>.

Despite higher average incomes, more expensive housing means that the poverty rate in London almost doubles when housing costs are taken into account (from 14 per cent to 24 per cent). This is a situation worse than any other region in the UK<sup>49</sup>. Poverty rates after housing costs are even higher in most Inner London boroughs (over 27 per cent over a 5 year period excluding 2020/21)<sup>50</sup>. Child poverty is most acute in wards in Tower Hamlets, Newham, Barking and Dagenham and Hackney.<sup>51</sup>

For some groups, the rate was even higher; the poverty rate after housing costs amongst Bangladeshi households in London was 63 per cent<sup>52</sup>, and for single parents it was 47 per cent<sup>53</sup>.

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<sup>43</sup> Office for Students - [Equality of Opportunity Risk Register](#) undated

<sup>44</sup> Home Office, [Hate crime, England and Wales, 2022 to 2023 second edition](#), updated 2 November 2023 (annual release)

<sup>45</sup> Government Equalities Office, [National LGBT Survey: Research report](#), updated 7 February 2019

<sup>46</sup> [Office for Students glossary entry for Underrepresented groups](#)

<sup>47</sup> See GLA Poll Results at [London Datastore](#)

<sup>48</sup> Trust for London (2024) [Number of People in Poverty by Household Tenure](#) 2024, data for 2004/05-2022/23

<sup>49</sup> Trust for London [Poverty Rates by Region](#) 2024

<sup>50</sup> Trust for London [Poverty Rates by London Borough](#) 2023

<sup>51</sup> Trust for London [Overview of London Boroughs](#) 2024

<sup>52</sup> Trust for London [Proportion of Households in Poverty by Ethnicity 2022-23](#) 2024

<sup>53</sup> Trust for London [Proportion of Households in Poverty by Family Type 2022-23](#) 2024



In 2022, 17 per cent of Londoners were in persistent poverty, compared to 12 per cent nationally<sup>54</sup>. In 2022-2023, almost a third of single pensioners lived in poverty, as did 47 per cent of lone parent households.<sup>55</sup>

## Other groups

### Asylum seekers and refugees

Asylum seekers have rapidly increased in the last few years, nationally and in London<sup>56</sup>. Accommodation provision is typically through hotel (initial) and private rental (dispersed) contracts as asylum seekers do not have access to other housing until they are granted refugee status. At this point, the rapid withdrawal of direct state support (within 28 days) can often lead to homelessness, given lack of time to find employment and linked to this, alternative accommodation<sup>57</sup>.

Research from 2018 found that refugees and asylum seekers in the bottom one third of income groups (before housing costs), are disproportionately housed in the private rental sector<sup>58</sup>.

According to the 2021 census, Londoners whose first language is not English make up 35.1 per cent of those who are homeless – but only 26.6 per cent of the overall population. This disproportionality is more pronounced among those with the least proficiency in English, who constitute 11.8 per cent of those who are homeless but only 4.2 per cent of the overall population.<sup>59</sup> This is likely to be a partial proxy for asylum seekers and refugees who may have had less opportunity to gain language fluency.

### Carers

The current cost-of-living crisis means that carers are facing unprecedented pressure on their finances: 25 per cent are cutting back on essentials such as food or heating and 63 per cent are extremely worried about managing their monthly costs<sup>60</sup>.

In addition, caring also comes with additional costs that can have a significant impact on carers' finances and many carers suffer financial hardship. 44 per cent of working-age adults who are caring for 35 hours or more a week are in poverty<sup>61</sup>. Carer's Allowance is the main carer's benefit and is the lowest benefit of its kind.

Being a carer also links to sex as a protected characteristic, as unpaid carers are more likely to be women (who make up 59 per cent of unpaid carers)<sup>62</sup>.

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<sup>54</sup> Trust for London [Poverty in London before and After the Covid19 Pandemic](#) 2022

<sup>55</sup> Trust for London [Who is in poverty in London?](#) 2024

<sup>56</sup> London Councils, [Asylum Seekers and refugees in London](#); House of Commons Library, [Asylum statistics](#), 24 May 2024

<sup>57</sup> Refugee Council, [Top facts from the latest statistics on refugees and people seeking asylum](#)

<sup>58</sup> University of York Centre for Housing Policy, [Vulnerability amongst Low-Income Households in the Private Rented Sector in England](#), 2018

<sup>59</sup> ONS [People experiencing homelessness, England and Wales: Census 2021 – Ethnic group, national identity, language and religion tables](#), 6 December 2023

<sup>60</sup> Carers UK, [State of Caring 2022 report](#), November 2022

<sup>61</sup> Joseph Rowntree Foundation, [UK Poverty 2022](#), January 2022

<sup>62</sup> Census 2021



In terms of housing, a 2016 report by Carers UK found:

- One in five carers (18 per cent) are waiting for adaptations to be made to their homes
- 10 per cent said that their home was in poor condition, damp or disrepair, rising to 15 per cent of carers renting privately
- 15 per cent said there isn't enough space for someone to provide overnight care, rising to 19 per cent of carers living in social housing
- 13 per cent said that as a result of caring there isn't enough space to live comfortably, rising to 18 per cent of carers living in social housing.

## **Veterans**

Only a small minority of the Armed Forces community will need to access the housing services provided by the housing bodies subject to the Duty (section 4A). However, there are likely to be disproportionate numbers needing specialist adapted housing, which may be particularly lacking. Some are at increased risk of homelessness, lacking the knowledge of the civilian housing sector, welfare system and budgeting, and being reluctant to seek help early<sup>63</sup>.

## **Care leavers**

Poor housing options and provision for care leavers persists. Such housing is often far from social networks and comprised of stressful environments that have knock-on effects for mental health<sup>64</sup>.

The Office for Students identifies that care leavers are underrepresented in terms of access to higher education and are more likely to be affected by cost pressures.<sup>65</sup>

## **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<sup>66</sup>. Given the need for affordable homes across London seems unlikely to be the case. However, further evidence is however needed.

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<sup>63</sup> Ministry of Defence, [Statutory Guidance on the Armed Forces Covenant Duty](#) November 2022

<sup>64</sup> The Care Leavers' Association/Department of Health, [Caring for Better Health](#) December 2017

<sup>65</sup> Office for Students [Equality of Opportunity Risk Register](#); Office for Students glossary entry for [underrepresented groups](#) undated

<sup>66</sup> Department for Children, Schools and Families, [Sufficiency: Statutory guidance on securing sufficient accommodation for looked after children](#) 2010

## Homelessness

The number of individuals seen sleeping rough in London rose substantially in 2022-23, to over 10,000. This continues a long-term trend<sup>67</sup>. More than 65,000 homeless households were being housed by London's local authorities in temporary accommodation at the end of March 2024.<sup>68</sup>

## 6.2 Gaps in evidence

Data on students segmented by protected characteristic and linked to London higher education providers is not publicly available at this time. For now, for many groups England-wide data and risk assessments have been used.

### LGBTQ+ and gender reassignment

There is a lack of data Lack of data on the extent to which those identifying as LGBTQ+, or undergoing gender reassignment, find it harder to access suitable housing they can afford compared with other groups. This makes it difficult to reliably identify potential impacts.

### Marriage and civil partnership

No data has been found detailing the extent to which this characteristic correlates with accessing suitable housing and related inclusive neighbourhood needs.

### Pregnancy and maternity

No data has been found detailing the extent to which this characteristic correlates with accessing suitable housing and related inclusive neighbourhood needs.

## 7 Appendix B: Engagement summary

### 7.1 Summary of groups engaged

#### Already engaged:

The consultation on the document, including the associated EqIA, was widely publicised, with several 'open to all' stakeholder events, as well as some more targeted sessions with Local Planning Authorities (LPAs) that are also bound by Equalities Act duties. As the consultation report sets out, there is limited information on the demographics of participants, including protected characteristics, as this was not recorded at events; and in the online survey relevant monitoring questions did not receive sufficient responses. However, several additional equalities issues were raised in this process, suggesting that this is nonetheless a helpful process.

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<sup>67</sup> DLUHC, [Tables on homelessness](#), last updated 30 November 2023 (annual)

<sup>68</sup> MHCLG [Tables on homelessness, quarterly release August 2024 Detailed Local Authority Tables table TA1](#)

### Future engagement:

The London Plan team continues to work to broaden its engagement reach, including through the Planning for London programme. Relevant information will be drawn into the monitoring process and used to update the LPG as necessary.

## 7.2 Engagement record

The detailed engagement record is to be found in the LPG consultation report.

In summary, of 39 respondents, 44 per cent would have been subject to the PSED (LPAs and HEPs). In addition several responses came from those with accessibility expertise.

Respondent type	Number	Percentage
Business excluding providers & developers	3	8 per cent
PBSA providers/investors	12	31 per cent
Other developers	2	5 per cent
Higher education provider (HEP)	5	13 per cent
Campaign/interest group	2	5 per cent
Local Planning Authority (LPA)	12	31 per cent
Statutory consultee/professional body	2	5 per cent
Individual	1	3 per cent
<b>Total</b>	<b>39</b>	<b>Rounded numbers so sums to just over 100</b>

While other engagement did take place, the consultation survey was the main source of input around equalities issues given specific questions on the implications of the guidance for different groups with protected characteristics, and the adequacy of the EqlA that accompanied the consultation draft of the guidance.

The pre-consultation EqlA highlighted the intention to contact student advocacy groups associated with particular protected characteristics such as disability. However, despite repeated attempts to engage with these, this has not proved to be possible, with some suggestion that they are not currently active. As a result, the assessment has relied on the expertise and advocacy of others, and secondary data such as the reports highlighted in the evidence section.

## 8 Appendix C: Legal context

### 8.1 Equality Act 2010

The Equality Act 2010 (the Act) 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; or arising from disability.

The Act recognises [nine protected characteristics](#):

#### 1. Age

A person having a particular age or being within an age group. This includes 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, 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.

#### 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 Act).

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, and this includes treating a woman unfavourably because she is breastfeeding.

#### 6. Race

In the 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 Act, 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.

## 8.1 Public Sector Equality Duty aims

The PSED set out at section 149 of the Act 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 the 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>69</sup>

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

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

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<sup>69</sup> [EHRC Technical Guidance](#)

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 exercising 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.