

Equality Impact Assessment (EqIA) for the Annual Monitoring Report (AMR) Framework (London Plan 2021)

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Teams involved:	<ul style="list-style-type: none"> • Planning Change and Delivery Team • London Plan Team
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1. Please provide an outline of the document, who it is aimed at and any key issues to be aware of.

The [London Plan](#) was published in March 2021. A new monitoring framework is required to monitor this London Plan as required by section 346 of the Greater London Authority (GLA) Act 1999. The new monitoring framework must meet Chapter 12 of the London Plan and the [Sustainability Statement](#) that was published alongside the Plan.

The first AMR to use this framework will be AMR 19 for the monitoring period 2021-22, which is expected to be published in March 2023.

Consultation was carried out between 14 December 2021 and 30 January 2022. A Mayoral decision will be made before the framework can be approved.

2. Which of the Public Sector Equality Duty aims are relevant to the framework and the impacts identified?

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

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

Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it 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.*

Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:

- *3(a) tackle prejudice, and*
- *3(b) promote understanding.*

Assessment

The AMR framework is a reporting structure for monitoring the performance of the London Plan 2021. The London Plan was supported by equality considerations and assessments set out in the Integrated Impact Assessment (IIA) and subsequent addendums; and in the supplementary EqIA information and tables that were published alongside the Plan (Appendix 1).

As such, where the key performance indicators (KPIs) and other evidence show that the London Plan delivery is in accordance with expectations, the impacts on people who share relevant protected characteristics would be expected to follow, in accordance with the documentation that accompanied the London Plan outlined above.

Similarly, where there is under-performance or poor performance, this would be expected to disproportionately impact on those groups identified in the London Plan documentation as being disproportionately impacted.

It would not be possible to repeat EqIA documentation for every AMR given the breadth of documentation that would be required and the resources required to draw together the necessary evidence to support this analysis. For this reason, it is suggested that performance (including any under-performance) is assumed to impact on people sharing relevant protected characteristics in accordance with the documents supporting the London Plan.

However, what is missing from the draft framework is a prompt to consider, and where appropriate, report any significant impacts on specific groups sharing one or more protected characteristics that don't accord with what was predicted within the London Plan supporting documentation. This means that meaningful consideration of equality impacts was wholly absent from the framework, and there was no scope to identify unanticipated impacts on specific groups (positive or negative).

Amendments to the AMR framework

Change	Reason for change
Additional section at 6.4.1 to record any significant, unanticipated equality impacts.	To provide both a prompt and an opportunity to report any unanticipated impacts not predicted by the documentation supporting the London Plan.

Recommendation

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

Outcome number	Description	Mark with an X (more than one box can apply)
Outcome one	No major change to the framework is required. This EqlA has not identified any potential for discrimination or negative impact, and all opportunities to advance equality have been taken.	
Outcome two	Adjustments to the framework are required (and have been made) to remove barriers identified by the EqlA or better advance equality.	X
Outcome three	Justify and continue with the framework despite having identified some potential for negative impacts or missed opportunities to advance equality.	
Outcome four	Stop, rethink or abandon when the EqlA shows actual or potential unlawful discrimination.	

Appendix A: Evidence reference

London Plan IIA (including EqlA) and Addendums

- [IIA Scoping Report 2017](#)
- [IIA Scoping Report – Summary of Consultation Responses 2017](#)
- [IIA for the draft New London Plan 2017](#)
- [London Plan IIA Addendum Report 2018](#)
- [IIA Addendum Report November 2019](#)
- [IIA Addendum Report December 2020](#)
- [Sustainability Statement March 2021](#)
- [Supplementary EqlA information](#)
- [IIA Supplementary EqlA Information 2019](#)

Appendix B: Engagement summary

Summary of protected groups engaged

No specific engagement was undertaken due to the nature of the AMR framework.

Engagement record

Groups sharing the following protected characteristics were raised in the consultation responses:

Age

Mums for Lungs, Alliance for Childhood, Mayoral Design Advocate, Elysian Residences

Race

The London Forum of Amenity and Civic Societies (only in relation to requesting all KPIs from the 2016 London Plan monitoring framework are included, including the previous KPIs to “Reduce the employment rate gap between Black, Asian and Minority Ethnic groups and the white population”).