

Equality Impact Assessment (EqIA) for London Plan Guidance

1 Overview

London Plan Guidance name: Large-scale purpose-built shared living LPG

Stage: Post-Consultation

Date of EqIA assessment: Last updated February 2024

Please provide a brief outline of the guidance:

The large-scale purpose-built shared living (LSPBSL) LPG sets out to support the implementation of London Plan Policy H16. In doing so, it recognises the role of such accommodation as part of London's broader housing ecosystem; and seeks to achieve consistent quality and inclusivity in delivery as part of wider Good Growth objectives. It does so by clarifying policy expectations around mixed and inclusive neighbourhoods; design and sufficiency of facilities; and management, providing benchmarks to assess scheme proposals against. 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 LSPBSL can nonetheless be problematic if unmanaged.

Who is the guidance aimed at?

The primary audience is Local Planning Authorities and others involved in bringing forward proposals for LSPBSL. The guidance is to help them best address housing needs through this type of accommodation, as part of a wider approach to housing and regeneration. This audience may include developers, providers and funders.

What are the key issues to be aware of?

This EqIA takes a general approach, loosely based on the assumption that LSPBSL is generally designed to meet the needs of single-person households seeking a significant degree of interaction with others in a similar position. However, the caveat is that this accommodation type has a unique purpose, 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The draft guidance has been amended post-consultation to address concerns raised during the consultation that the single-occupancy requirement amounted to indirect discrimination in relation to marital status. Whilst marriage and civil partnership is a protected characteristic under the Equality Act 2010 (the Equality Act), it is not covered in the same way to other protected characteristics by the public sector equality duty (PSED). In relation to marriage and civil partnership, a body subject to the PSED need only comply with its first aim (and only in relation to work). This aim is limited in scope to circumstances where the Equality Act makes discrimination, harassment, victimisation or other prohibited conduct because of a particular protected characteristic unlawful.

Nonetheless the single-occupancy requirement has been removed from the guidance. The LPG has also been amended to encourage appropriate awareness-raising of wheelchair-

accessible accommodation, and other inclusive design features, to broaden the inclusivity of the accommodation provided in practice. References to design being affected by target demographic considerations have also been removed. While LSPBSL schemes are not restricted to any particular user groups by occupation or specific need, they generally cater to a younger age demographic of working people. They are currently targeted at this group through marketing material that should, in future, reflect the full range of individuals who could benefit from it. This reflects consultation responses, as set out in the consultation report at appendix 1, rather than issues identified in the original EqIA.

There are still relatively few LSPBSL schemes in operation (there were even fewer at the point of consultation in early 2022). 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,¹ 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.

Yes

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

Yes

3. Foster good relations between people who share a relevant 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).²

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

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

Table 1: Summary assessment of post-consultation draft guidance

Guidance key aspects, chapter headings, theme etc	Group(s) that could be impacted
<p>Fostering mixed and inclusive neighbourhoods through advising on plan-making and other consideration of over-concentration of LSPBSL and ensuring appropriate affordable housing contributions. Also consideration and addressing of infrastructure impacts.</p>	<p>Positive: All groups, helping to ensure different housing needs are balanced across an area rather than overly dominated by a particular type, and that authorities are overall more able to meet a range of needs. Neutral: All groups – infrastructure impacts addressed.</p>
<p>Design Standards: requiring sufficient and comfortable facilities with good design quality. Improved certainty/consistency particularly relating to facilities/space provision through assessment benchmarks to guide design and assessment of schemes.</p>	<p>Positive: All groups – given that all should be able to benefit as visitors, though low-income groups (noting intersectionality with other protected characteristics) may be less able to access the accommodation as residents.</p>
<p>Inclusive design and management advice relating to the accommodation, (including housing mix) public spaces and integration with the wider neighbourhood</p>	<p>Positive: Disabled people with particular access needs and religious groups requiring prayer/worship space – highlights design considerations that recognise the way that different people use their accommodation/communal and public space varies, and different needs that should be met, avoiding conflict.</p> <p>All should benefit from design seeking to foster a sense of community – encouraging interaction between different groups and the fostering of mutual understanding.</p> <p>All should benefit from design advice concerned with making public spaces more safe and secure, and especially groups that have particular personal safety concerns related to their protected characteristics, including LBGT+ people, women, disabled people and those from Black, Asian and minority ethnic groups.</p>

It should be noted that the general policy requirement and principles are already required through the London Plan. This LPG 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 the implementation of this (post-consultation draft) guidance for specified groups (including those that share a protected characteristic).

Evidence (including engagement)³ 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.

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 increase in good-quality LSPBSL benefiting those of all age groups, though acknowledging younger people are particularly attracted to this housing type. This should improve their housing choice and wellbeing, as derived from managed brand quality; an emphasis on a variety of spaces for social interaction; and predictable billing for energy and other utilities. (Strong positive.)

The revised guidance also recognises that some other people, including older people and others experiencing life changes (e.g. bereavement, changes in relationships, moves to a new city) may also benefit from this housing typology; and that design, management and marketing should acknowledge this to make it more inclusive in practice. (Positive.)

There may also be indirect impact on the HMO private rental sector, alleviating competition and upward pressures on rents. This may also benefit the housing choice and wider quality of life of some young people and others (including older people) that resort or choose to live in this type of housing. (Positive.)

Affordable accommodation payments in lieu, and encouraging on-site conventional C3 provision where the site is sufficiently large, should also help address wider supply of affordable housing. This may be particularly relevant for those from backgrounds affected by other inequalities arising from protected characteristics resulting in low incomes (see below). (Positive.)

This benefit may also arise from the guidance advising on wider housing-mix considerations that can help address imbalances at a neighbourhood level; and/or in

³ See Appendix A and B.

delivery that may otherwise have reduced the housing choice in some areas for families and older people. This can contribute to neighbourhoods that are more mixed and inclusive, addressing social exclusion and poverty. (Positive.)

Considering resident and visitor needs in the design and provision of communal facilities should enable social interaction between people with different characteristics, improving social inclusion and fostering mutual understanding (Positive.)

Guidance encouraging the design and management of successful mixed-use developments, integrated with wider neighbourhoods, should also help address the housing, employment and social infrastructure needs of all Londoners, including older people. This can in turn help to promote a culture of equality; and reduce poverty and social exclusion experienced by these older 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 the ability of anyone in the neighbourhood to access the infrastructure they need. This should avoid any adverse impacts for all (Neutral.)

The guidance also advises on design and management plan mitigation of issues associated with the impact of a large development on the wider neighbourhood. This includes the impact of servicing and resident access/egress on surrounding streets and pavements, such as disruption and crowding that may particularly affect older people with mobility impairments and children in buggies. This guidance should neutralise these potential impacts, particularly when acting in tandem with broader design and Transport for London (TfL) advice on streets. (Neutral.)

Potential negative impacts, mitigations or objective justification and scores

None identified

Relevant PSED aim(s)⁴

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

Disability (consider 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 people seeking to live in a more social form of accommodation. This recognises that private-sector HMOs (the typical alternative to LSPBSL) are often in older, inaccessible housing stock, affecting equality of opportunity for disabled people. This should widen their housing choice; improve their ability to live away from their family home if best suited to their needs and career plans; and improve their

⁴ See Appendix C for the PSED aims.

ability to socialise with people in similar circumstances and other benefits of living in and visiting LSPBSL. (Strong positive)

Inclusive design guidance, including that relating to flexibility to meet different needs and ensure adequate size, quality and accessibility of spaces and facilities, considering resident and visitor needs, should improve the inclusion, health and wellbeing of all residents, and may particularly benefit those with mental health conditions. The management plan guidance that seeks awareness-raising through marketing of inclusive design features to broaden the demographic reach of the accommodation should also help reinforce this. (Positive.)

The potential indirect impacts on the HMO private rental sector, alleviating competition and upward pressures on rents, may also benefit the housing choice and wider quality of life of 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 advising 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 LSPBSL 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.)

Considering resident and visitor needs in the provision of communal facilities should enable social interaction between people with different characteristics, improving social inclusion and fostering mutual understanding (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 the ability of anyone in the neighbourhood to access the infrastructure they need. This should avoid any adverse impacts (Neutral.)

The guidance also advises on design and management plan mitigation of issues associated with the impact of a large development on the wider neighbourhood. This includes the impact of servicing and resident access/egress on surrounding streets and pavements, such as disruption and crowding that may particularly disabled people with mobility impairments or others that find crowds and other disruption challenging. This guidance should neutralise these potential impacts, particularly when acting in tandem with broader design and TfL advice on streets. (Neutral.)

Potential negative impacts, mitigations or objective justification and scores

No impacts identified.

Relevant PSED aim(s)

- 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 public and external communal spaces. This should help address vulnerability; and help people feel more safe and secure. (Positive.)

Considering resident and visitor needs in the provision of communal facilities should enable social interaction between people with different characteristics, improving social inclusion and fostering 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 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 the ability of anyone in the neighbourhood to access the infrastructure they need. This should avoid any adverse impacts for all. (Neutral.)

Potential negative impacts, mitigations or objective justification and scores

No impacts identified.

Relevant PSED aim(s)

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

Marriage and civil partnership

Potential positive impacts and scores

The consultation draft guidance previously specified that rooms should be secured for single occupation only. Consultation responses raised this as a negative impact amounting to potential indirect discrimination in relation to marital status. Whilst marriage and civil partnership is a protected characteristic under the Equality Act, the PSED (as explained above) does not cover it in the same way as other protected characteristics.

Nonetheless the single-occupancy requirement has been removed from the guidance, enabling some larger rooms to be let to couples, improving their housing choice. Guidance that management plans should include appropriate marketing provision to improve awareness of inclusive design features (which may include larger rooms) should also help reinforce this. (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 for all. (Positive.)

Potential neutral impacts and scores

The guidance recognises that this housing typology is typically aimed at single-person households. This does not in itself affect the ability of married persons to access it. (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 the ability of anyone in the neighbourhood to access the infrastructure they need. This should avoid any adverse impacts for all. (Neutral.)

Potential negative impacts, mitigations or objective justification and scores

No impacts identified.

Relevant PSED aim(s)

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

Pregnancy and maternity

Potential positive impacts and scores

Inclusive design and management guidance, particularly that relating to external public realm and internal/external communal spaces, considering resident and visitor needs, should benefit all – including those with pregnancy and maternity-related mobility impairments and particular access (e.g. pram/pushchair related) needs. (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 affects 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 the ability of anyone in the neighbourhood to access the 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

Provision of LSPBSL, and its potential impact on alleviating pressures on the private rental (HMO) sector that affect rents (pushing them upwards) and competition for housing, are likely to particularly benefit 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, in part due to unaffordable rent increases; these groups may also benefit through this mechanism. (Positive.)

Considering resident and visitor needs in the provision of communal facilities should enable social interaction between people with different characteristics, improving social inclusion and fostering mutual understanding. (Positive.)

People from Black, Asian and Minority Ethnic backgrounds may also benefit from the guidance advising 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 (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 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 public and external communal spaces. This should help address vulnerability; and help people feel more safe and secure. (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 the ability of anyone in the neighbourhood to access the infrastructure they need. This should avoid any adverse impacts. (Neutral.)

The guidance also advises on design and management plan mitigation of issues associated with the impact of a large development on the wider neighbourhood. This includes the impact of servicing and resident access/egress on surrounding streets and pavements; and on cultural events in surrounding communities that may be associated with particular ethnic groups. This guidance should neutralise these potential impacts,

particularly when acting in tandem with broader design and TfL advice on streets. (Neutral.)

Potential negative impacts, mitigations or objective justification and scores

No impacts identified.

Relevant PSED aim(s)

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

Religion or belief

Potential positive impacts and scores

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

Inclusive design guidance within the document encourages consideration of diversity of needs – including for designated cooking/food storage and preparation associated with particular religious practices; and for suitable prayer/worship space. The management plan guidance that seeks awareness-raising through marketing 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, improving social inclusion and fostering 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 the ability of anyone in the neighbourhood to access the infrastructure they need. This should avoid any adverse impacts. (Neutral.)

The guidance also advises on design and management plan mitigation of issues associated with the impact of a large development on the wider neighbourhood. This includes the impact of servicing and resident access/egress on surrounding streets and pavements; and on cultural events in surrounding communities that may be associated with particular religious groups. This guidance should neutralise these potential impacts, particularly when acting in tandem with broader design and TfL advice on streets. (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. This should help address vulnerability, and help women feel more safe and secure in public spaces. (Positive.)

A positive 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 addressing social exclusion and poverty. (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 affects 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 the ability of anyone in the neighbourhood to access the 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)

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 public and external communal spaces. This should help address vulnerability; and help people feel more safe and secure in public spaces. (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 LGBTQ+ people. (Positive.)

Considering resident and visitor needs in the provision of communal facilities should enable social interaction between people with different characteristics, improving social inclusion and fostering mutual understanding. (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 the ability of anyone in the neighbourhood to access the infrastructure they need. This should avoid any adverse impacts. (Neutral.)

The guidance also advises on design and management plan mitigation of issues associated with the impact of a large development on the wider neighbourhood. This includes the impact of servicing and resident access/egress on surrounding streets and pavements, and on events in surrounding communities which may be associated with particular groups. This guidance should neutralise these potential impacts, particularly when acting in tandem with broader design and TfL advice on streets. (Neutral.)

Potential negative impacts, mitigations or objective justification and scores

No impacts identified.

Relevant PSED aim(s)

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

People on low incomes⁵

Potential positive impacts and scores

Low-income groups may also benefit from the indirect impact of alleviation of pressures on the private rental HMO sector, where many (particularly those not on benefits) may be particularly focused, and vulnerable to homelessness, given their income situation where rental rises may easily tip into unaffordability. (Positive.)

People from low-income backgrounds may also benefit from the guidance advising 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 low-income groups are more in need of. (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 people. (Positive.)

In addition, considering resident and visitor needs in the provision of communal facilities should enable social interaction between people with different characteristics, improving social inclusion and fostering mutual understanding. (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 the ability of anyone in the neighbourhood to access the infrastructure they need. This should avoid any adverse impacts. (Neutral.)

The guidance also advises on design and management plan mitigation of issues associated with the impact of a large development on the wider neighbourhood. This includes the impact of servicing and resident access/egress on surrounding streets and pavements. This guidance should neutralise these potential impacts, particularly when acting in tandem with broader design and TfL advice on streets. (Neutral.)

Potential negative impacts, mitigations or objective justification and scores

No impacts identified.

Relevant PSED aim(s)

- 2 (a)
- 2 (c)

⁵ The socio-economic duty was introduced into legislation as Section 1 of the Equality 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 Equality 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 brackets, so may benefit from an increase in this type of provision that indirectly alleviates pressure on the private rental HMO sector. This may help address upward pressure on rents and competition that affects people's disposable income and propensity to homelessness. (Positive.)

There may be further benefits through the guidance advising on housing-mix considerations that 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.)

Considering resident and visitor needs in the provision of communal facilities should enable social interaction between people with different characteristics, improving social inclusion and fostering mutual understanding. (Positive.)

In addition, more generally 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 these groups. (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 the ability of anyone in the neighbourhood to access the 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 (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	Yes	-	-	-
Pregnancy and maternity	-	Yes	Yes	-	-	-
Race	-	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 (e.g. the combination of design and management features, and marketing material that raises awareness raising).

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/the earlier EqIA.

4 Recommendation

The EqIA 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 housing need (including composition by group characteristic) will continue to be developed, and will further help to identify and monitor relevant trends.

6 Appendix A: Evidence Reference and Content

6.1 Evidence

Age

London has a relatively young population. The median age of Londoners is 35, compared to a national average of 40. Under-25s make up 30 per cent of London's population; those aged 65-plus make up 12 per cent.⁶

Those aged 16-24 are more likely to be unemployed than those aged 25-64.⁷

Younger Londoners face higher housing costs than older groups: those aged 16-49 spend, on average, 29 per cent of their net income on housing costs, compared to 24 per cent for 50-64 year olds and 17 per cent for those aged 65-plus.⁸

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.⁹

At the end of March 2023 there were just over 60,000 homeless households living in temporary accommodation arranged by London boroughs, including 76,970 children.¹⁰ In 2022-23, households with dependent children comprised more than 89 per cent of households accepted as statutorily homeless.¹¹

Those under 24 are now less likely to live in the private rental sector than they would have been 20 years ago – and more likely to still live at home due to rising costs. Older people make up an increasing proportion of private renters, so this may change over time.¹²

Around one in four children are in persistent poverty. Child poverty overall stands at around 33 per cent.¹³

The proportion of London's pensioners in poverty is 23 per cent: just above that of the working-age population. One in nine London pensioners are living in material deprivation, unable to access the necessities for today's society.¹⁴

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.¹⁵

⁶ [ONS, 2021 census](#)

⁷ ONS/London Datastore, [Unemployment numbers and rates by equalities group LFS](#)

⁸ Resolution Foundation, [Intergenerational audit for the UK: Data dashboard, 2023 \(data to 2017\)](#)

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

¹⁰ GLA Housing and Land, [Housing in London 2023](#), October 2023

¹¹ DLUHC, [Homelessness Live Tables](#), 2023

¹² ONS, [UK private rented sector – 2018](#), 18 January 2019

¹³ GLA: London Datastore, [Poverty in London 2021/22](#), 27 March 2023

¹⁴ GLA: London Datastore, [Poverty in London 2021/22](#), 27 March 2023

¹⁵ ONS, [Census 2021: Household composition, occupancy rating for bedrooms and tenure of household](#)

Disability

Disabled people are more likely to live in the social rented sector compared with their non-disabled counterparts. Across the UK, nearly one in four disabled people aged 16 to 64 (24.9 per cent) rent social housing, compared with fewer than one in 10 non-disabled people (7.9 per cent).¹⁶ In London, this proportion rises to nearly one in three (30 per cent)¹⁷

The proportion of disabled people living with their parents has risen 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 their parents is more or less unchanged (from 18.2 per cent to 19.2 per cent in the same period).¹⁸

Disabled residents are more likely to be living in poverty: 33 per cent of Londoners who live in families where someone is disabled are living in poverty after housing costs, compared to 22 per cent of those in families where no one is disabled.¹⁹

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.²⁰

Gender reassignment

In 2022-23, the police recorded 4,732 hate crimes against transgender people across England and Wales: an increase of 11 per cent from the previous year.²¹ Probable underreporting means this figure is likely low (out of 108,100 responses to the 2017 National LGBT Survey, 88 per cent of transgender people did not report the most serious type of incident).²² Transgender people are more likely to experience threats of physical or sexual harassment or violence compared with the LGBT community as a whole.²³

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 last year. In the survey, 20 per cent reported that they had experienced discrimination while looking for a new home.²⁴

Marriage or civil partnership

No relevant data.

Pregnancy and maternity

No relevant data.

¹⁶ ONS, [Outcomes for disabled people in the UK: 2021](#), 10 February 2022

¹⁷ ONS, [Table 6: Housing Situation of people aged 16 to 64 by disability status and English region](#), 2021

¹⁸ ONS, [Table 6: Housing Situation of people aged 16 to 64 by disability status and English region](#), 2021

¹⁹ Trust for London, [Proportion of Londoners in poverty in families with and without disabled persons](#), 2023 (based on three-year averages to 2021-22 excluding 2020-21, using DWP data)

²⁰ GLA Housing and Land, [Housing in London 2023](#), October 2023

²¹ Home Office, [Hate crime, England and Wales, 2022 to 2023 second edition](#), updated 2 November 2023

²² Government Equalities Office, [National LGBT Survey: Research report](#), updated 7 February 2019

²³ Stop Hate UK, [Transgender Hate](#)

²⁴ Stonewall, [LGBT in Britain – Trans Report](#), 2018

Race

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.²⁵

Currently, 39 per cent of Black, Asian and Minority Ethnic Londoners live in relative poverty after housing costs, compared to 21 per cent of White Londoners.²⁶ 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.²⁷

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% for White household. For single parents it was 47 per cent. Poverty rates also varied significantly across London's boroughs.²⁸

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, and the insulating effect of home ownership.²⁹

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.³⁰

Households headed by someone who is Black are around 150 per cent more likely to be owed a homelessness duty.³¹ 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 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.³²

²⁵ GLA, [Housing and race equality in London: An analysis of secondary data](#), March 2022

²⁶ (source: GLA analysis of Households Below Average Income data (End User dataset), Homes for Londoners: Affordable Homes Programme 2021-2026 Equality Impact Assessment)

²⁷ GLA, [Housing in London 2023](#), October 2023

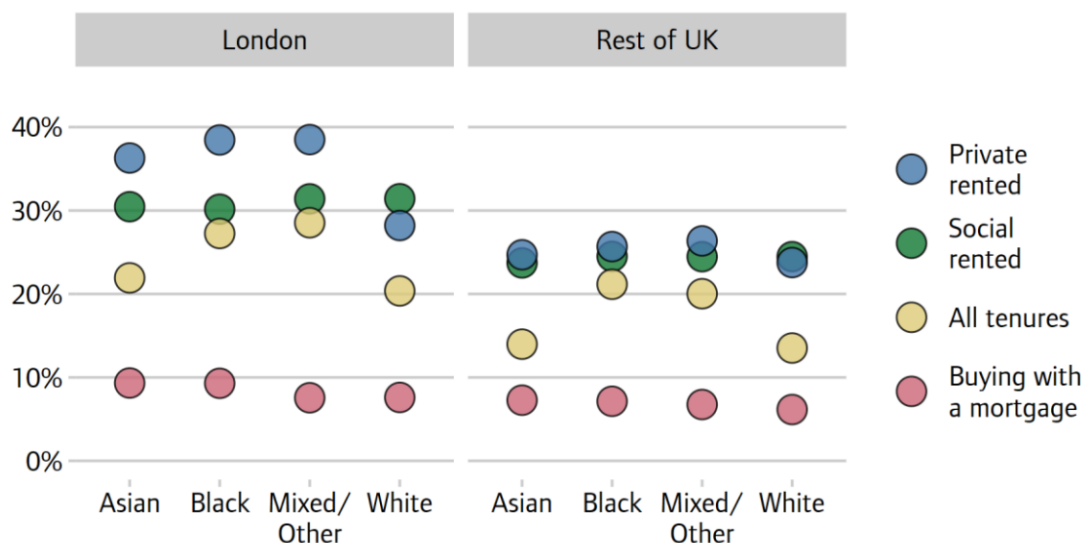
²⁸ Trust for London, [Who is in poverty in London?](#), 21 July 2023 (using 2021-22 data)

²⁹ GLA, [Housing and race equality in London: An analysis of secondary data](#), March 2022

³⁰ GLA, [Housing and race equality in London: An analysis of secondary data](#), March 2022 (using English Housing Survey 2014-18)

³¹ GLA Housing and Land, [Housing in London 2023](#), October 2023

³² GLA, [Housing and race equality in London: An analysis of secondary data](#), March 2022 (using data from the English Housing Survey and the DLUHC)



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

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.³³ More specifically, Londoners from Bangladeshi and Black African backgrounds were among those most likely to say they are living in crowded homes.³⁴

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.³⁵

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).³⁶ 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.³⁷

³³ DLUHC, [Overcrowded households](#), 2 August 2023

³⁴ GLA, [Housing in London 2022](#), October 2022 (from 2021-22 London survey data).

³⁵ GLA Housing and Land, [Housing and race equality in London: An analysis of secondary data](#), March 2022

³⁶ ONS, [People experiencing homelessness, England and Wales: Census 2021 – Ethnic group, national identity, language and religion tables](#), 6 December 2023

³⁷ ONS, [Census 2021: Combination of religions in household and household deprived in the housing dimension](#)

Sex

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) while single males comprise 38 per cent of households assessed as owed a duty.³⁸

Sexual orientation

In 2022-23, 24, the police recorded 24 102 hate crimes related to sexual orientation across England and Wales.³⁹ 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.⁴⁰

People on low incomes

The proportion of Londoners saying they were 'financially struggling' increased from 12 per cent in January 2022 to 17 per cent in January 2023. Londoners living in social rented accommodation and with a gross household income of less than £20,000 remain most likely to be 'financially struggling'. In January 2023, over half of Londoners (54 per cent) said they struggled to pay for food and essential items, up from 39 per cent in January 2022.⁴¹

In 2021-22, 25 per cent of Londoners had a maximum of £1,500 in savings. This is a significant reduction from 33 per cent in 2018-19. Black Londoners were the ethnic group most likely to be in this category.⁴²

Despite higher average incomes, more expensive housing means that the 2021-22 poverty rates in London almost doubles when housing costs are taken into account (from 14 per cent to 25 per cent), meaning London has the highest regional poverty rate in the UK.⁴³ Around one in six Londoners are in persistent poverty.⁴⁴ As detailed in other sections above, for some groups poverty rates are even higher.

Lower-income households are more likely to rent, with roughly the same proportion in social rent and private rental tenures (38 per cent and 37 per cent respectively) – the latter has significantly increased in recent years. Of all tenures, poverty rates are highest for those in social rented housing (49 per cent), compared to 31 per cent of those in privately rented, and 11 per cent of owner-occupiers.⁴⁵

Estimates suggest that London households in poverty (those with incomes that are up to 60 per cent below the median), on average, spend 54 per cent of their total net income on housing costs, compared with just 13 per cent for the rest of the population.⁴⁶

³⁸ DLUHC, [Tables on homelessness](#), last updated 30 November 2023

³⁹ Home Office, [Hate crime, England and Wales, 2022 to 2023 second edition](#), updated 2 November 2023

⁴⁰ Government Equalities Office, [National LGBT Survey: Research report](#), updated 7 February 2019

⁴¹ See GLA Poll Results surveys at [London Datastore](#)

⁴² GLA: London Datastore, [Survey of Londoners 2021-22](#)

⁴³ Trust for London, [Poverty rates by region](#), 2023

⁴⁴ GLA: London Datastore, [Poverty in London 2021/22](#), 27 March 2023

⁴⁵ Trust for London, [Housing](#), 2023 (using three year average to 2021-22 excluding 2019-20)

⁴⁶ Trust for London, [Relative housing costs](#), 2023 (using three-year rolling averages 2017-18 to 2019-20)

Other groups

Asylum seekers and refugees

Asylum seekers have rapidly increased in the last few years, nationally and in London.⁴⁷ 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 as refugees, given the lack of time to find employment and, linked to this, alternative accommodation.⁴⁸

Research from 2018 found that refugees and asylum seekers in the bottom one third of before housing costs income groups, are disproportionately housed in the private rental sector.⁴⁹

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 disproportion 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.⁵⁰ 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 and heating; and 63 per cent are extremely worried about managing their monthly costs.⁵¹

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.⁵² Carer's Allowance, the main carers' benefit, is £76.75 per week (2023-24) for a minimum of 35 hours. It is the lowest benefit of its kind. In the UK, 977,506 carers were in receipt of Carer's Allowance in 2022.⁵³

Being a carer also links to sex as a protected characteristic, as unpaid carers are more likely to be women (according to the 2021 census, 59 per cent of unpaid carers are women).

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

⁴⁷ London Councils, [Asylum Seekers and refugees in London](#); House of Commons Library, [Asylum statistics](#), 12 September 2023

⁴⁸ Refugee Council, [Top facts from the latest statistics on refugees and people seeking asylum](#)

⁴⁹ University of York Centre for Housing Policy, [Vulnerability amongst Low-Income Households in the Private Rented Sector in England](#), 2018

⁵⁰ ONS, [People experiencing homelessness, England and Wales: Census 2021 – Ethnic group, national identity, language and religion tables](#), 6 December 2023

⁵¹ Carers UK, [State of Caring](#), November 2022

⁵² Joseph Rowntree Foundation, [UK Poverty](#), 18 January 2022

⁵³ DWP, [Stat-Xplore](#), retrieved in February 2022

- 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

Veterans are likely to disproportionately need specialist adapted housing, which may be particularly lacking. Additionally, some are at increased risk of homelessness due to a lack of knowledge around the civilian housing sector, welfare system and budgeting; and a reluctance to seek help early.⁵⁴

Care leavers

Poor housing options and provision for care leavers persists. It is often far from social networks, and comprised of stressful environments that have knock-on effects to mental health.⁵⁵

Looked-after children

There is concern for the distribution of housing options, including sufficient in-borough provision (e.g. foster care) which is likely to correlate with the availability of affordable housing. Statutory guidance assumes that foster carers can access the homes they need, including affordable homes, in each borough. Given the need for affordable homes across London, this seems unlikely.⁵⁶ However, further evidence is however needed.

Homelessness

The number of individuals seen sleeping rough in London rose substantially in 2022-23, to over 10,000, continuing the long-term trend. At the end of March 2021, more than 60,000 homeless households were being housed by London's local authorities in temporary accommodation.⁵⁷

6.2 Gaps in evidence

LGBTQ+

There is a lack of data on the extent to which those who identify as LGBTQ+ find it harder to access suitable and affordable housing, compared with other groups. This makes it difficult to reliably identify potential impacts in this domain, though some wider issues can be surmised in relation to broader experiences in public spaces.

Marriage and civil partnership

⁵⁴ Ministry of Defence, [Statutory Guidance on the Armed Forces Covenant Duty](#), November 2022

⁵⁵ The Care Leavers' Association, [Caring for Better Health](#), December 2017

⁵⁶ Department for Children, Schools and Families, [Statutory Guidance on Securing Sufficient Accommodation for Looked After Children](#), 2010

⁵⁷ GLA: London Datastore, [Raising Living Standards](#)

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

Pregnancy and maternity

No data has been found that details 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 LPAs that are also bound by Equalities Act duties. As the consultation report sets out, there is limited information on the demographics, including protected characteristics, of participants, as this was not recorded at events and people chose not to respond to relevant monitoring questions in sufficient numbers in the online survey. However, several additional equalities issues were raised in this process, suggesting that this is nonetheless a helpful process.

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 (see Appendix 1 of that document).

In summary, of 33 survey respondents, 39 per cent would have been subject to the PSED.

Respondent type	Number	Percentage
Anonymous	5	15%
Business	14	42%
Government body or agency	1	3%
London Local Planning Authority	12	36%
Professional Body	1	3%
Total	33	100%

While other engagement did take place, the 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 EqIA that accompanied the consultation draft of the guidance.

8 Appendix C: Legal context

8.1 Equality Act 2010

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

The Equality 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 which 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.

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

Marriage and civil partnership are a protected characteristic for the purposes of the duty but only in relation to the first aim of the equality duty as detailed below and only in relation to work.

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

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

7. Religion or belief

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

8. Sex

A man or a woman.

9. Sexual orientation

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

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

8.2 Public Sector Equality Duty aims

The PSED set out at section 149 of the Equality Act 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 Equality Act because of any of the protected characteristics.
- Aim 2: advance equality of opportunity between people who share a protected characteristic and those who do not. This only applies in relation to those who share a relevant protected characteristic for the purposes of this aim.
- Aim 3: foster good relations between people who share a protected characteristic and those who do not. This only applies in relation to those who share a relevant protected characteristic for the purposes of this aim.

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.⁵⁸

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

⁵⁸ Equality and Human Rights Commission, [EHRC Technical Guidance](#)

- Aim 2(a): remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic
- Aim 2(b): take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it
- Aim 2(c): encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

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

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

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