

Equality Impact Assessment (EqIA) for London Plan Guidance

	Energy Assessment Guidance update May 2022
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1. Please provide an outline of the guidance, who it is aimed at and any key issues to be aware of.

The purpose of an energy assessment is to demonstrate that the proposed climate change mitigation measures comply with London Plan energy policies, including the energy hierarchy. It also ensures energy remains an integral part of the development's design and evolution.

The guidance document explains how to prepare an energy assessment to accompany strategic planning applications referred to the Mayor as set out in London Plan Policy SI 2. It is for anyone involved in, or with an interest in developing energy assessments including developers, energy consultants and local government officers.

The update to the guidance reflects the changes to Part L and Part O of national Building Regulations

2. Which of the Public Sector Equality Duty aims are relevant to the guidance 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:

1. *eliminate discrimination, harassment and victimisation and other conduct prohibited under the Act;*
2. *advance equality of opportunity 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;

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.

Consider which aims are particularly relevant to the guidance.

Assessment

List aspects of the guidance* that might affect particular groups

Guidance key aspects, chapter headings, theme etc	Particular group that could be affected
<p>Carbon emissions reduction The guidance promotes on-site carbon savings as part of the overarching net zero-carbon requirement of the London Plan and introduces new metrics which combined, are likely to result in greater levels of carbon reductions for major development sites. This will strengthen the climate change mitigation aspects of the London Plan</p>	Older people, children, disabled people, pregnant women, Black, Asian and minority ethnic people.
<p>Overheating The updated guidance, in combination with changes to national Building Regulations, will improve the accuracy of overheating assessments and help ensure overheating risks are identified at planning stage</p>	Older people, children, disabled people, pregnant women, Black, Asian and minority ethnic people.
<p>Energy efficiency and fuel poverty The guidance in combination with changes to national Building Regulations, encourages improvements to the energy efficiency of new buildings which should lead to lower fuel costs for occupiers</p>	Children, disabled people, Black, Asian and minority ethnic people, women, people on low incomes.

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

Equality impacts, mitigating actions and justification (where applicable)

Group	Potential impact description	Relevant PSED aim (1, 2a, b or c, and/or 3a or b)	Actions identified and/or justification	Assessment of equality impacts
Age (consider particularly children, under 21s and over 65s)	<p>Positive</p> <p>The guidance (acting in combination with London Plan policy and national Building Regulations) is likely to result in higher levels of carbon reductions for major development sites which will help mitigate climate change.</p> <p>This may have a positive impact on older people and children who are more susceptible the effects of extreme weather events which are likely to increase in frequency and intensity under climate change scenarios.</p>	2a	<p>The London Plan carbon reduction policies apply to major developments only, the positive impacts of the policy could be maximised if applied to smaller-scale development. It is not possible to amend the policy to widen its application via this guidance. However, in many instances Borough's elect to expand and incorporate the Mayor's strategic policies into their Local Plans and the guidance encourages boroughs to apply and adapt the principles</p>	<p>+ 1</p>

	<p>In addition, as a result of the guidance encouraging improved thermal efficiency standards in new housing, future homes will be more fuel efficient. Reducing the burden of heating homes in the winter and cooling in the summer will be especially beneficial to elderly people and children, both in health and financial terms.</p> <p>The combined effect of changes to the approach to overheating assessments will also improve the accuracy of heat risk assessments and allow these risks to be mitigated which may have a particular positive impact on older people and children who are more vulnerable to the impacts of overheating.</p>		<p>of the guidance to smaller scales of development.</p>	
<p>Disability (consider different types of physical, learning or mental disabilities)</p>	<p>Positive</p> <p>The guidance, in combination with London Plan policy and Building Regs, is likely to have a positive impact for groups such as disabled people, as well as groups at greater risk of poor mental health including disabled adults. People in these groups may be more likely to experience health related issues which may be exacerbated by a lack of a comfortable climate within their homes.</p>	<p>2a</p>	<p>The London Plan carbon reduction policies apply to major developments only, the positive impacts of the policy could be maximised if applied to smaller-scale development. It is not possible to amend the policy to widen its application via this guidance. However, in many instances Borough's elect to</p>	<p>+ 1</p>

	<p>In addition, people living with disabilities are more likely to have lower incomes or be in workless households, making them more vulnerable to the financial burdens of heating homes.</p> <p>By increasing the thermal efficiency of new homes, the guidance will reduce the burden of heating homes in the winter and cooling in the summer, which will be beneficial to people living with disability, both in health and financial terms. In addition, the climatic benefits secured through the reduction in carbon emissions by the guidance will lower the propensity of extreme weather events which would otherwise impact on disabled people who may be more susceptible their effects (e.g. flooding or heatwaves).</p>		<p>expand and incorporate the Mayor's strategic policies into their Local Plans and the guidance encourages boroughs to apply and adapt the principles of the guidance to smaller scales of development.</p>	
Gender reassignment	None identified.			
Marriage and civil partnership	None identified.			

<p>Pregnancy and maternity</p>	<p>Positive</p> <p>The combined effect of changes to the approach to overheating assessments will also improve the accuracy of heat risk assessments and allow these risks to be mitigated which may have a particular positive impact on pregnant women who are more vulnerable to the impacts of overheating.</p>	<p>2a</p>	<p>The London Plan carbon reduction policies apply to major developments only, the positive impacts of the policy could be maximised if applied to smaller-scale development. It is not possible to amend the policy to widen its application via this guidance. However, in many instances Borough's elect to expand and incorporate the Mayor's strategic policies into their Local Plans and the guidance encourages boroughs to apply and adapt the principles of the guidance to smaller scales of development.</p>	<p>+ 1</p>
<p>Race or Ethnicity (consider refugees, asylum seekers, migrants, gypsies and travellers)</p>	<p>Positive</p> <p>The reduction in carbon emissions secured by the guidance will help to mitigate against the acceleration of climate change and the propensity of extreme weather events. This will be beneficial to Black, Asian and minority ethnic people who are more likely to live in areas of London that are most susceptible to climate risks including</p>		<p>The London Plan carbon reduction policies apply to major developments only, the positive impacts of the policy could be maximised if applied to smaller-scale development. It is not possible to amend the policy to widen its application via this guidance. However, in many instances Borough's elect to</p>	<p>+ 1</p>

	<p>flooding, exposure to toxic air, and heat risk.</p> <p>In addition, as a result of the guidance encouraging improved thermal efficiency standards in new housing, future homes will be more fuel efficient. Reducing the burden of heating homes in the winter and cooling in the summer will be beneficial to Black, Asian and minority ethnic Londoners who are more likely to experience fuel poverty</p>		<p>expand and incorporate the Mayor's strategic policies into their Local Plans and the guidance encourages boroughs to apply and adapt the principles of the guidance to smaller scales of development.</p>	
Religion or belief	None identified.			
Sex	<p>Positive</p> <p>The guidance (acting in combination with London Plan policy and national Building Regulations) encourages improved thermal efficiency standards in new housing, meaning future homes will be more fuel efficient. Reducing the burden of heating homes in the winter and cooling in the summer will be beneficial to lone parents (90% of which</p>	2a	<p>The London Plan carbon reduction policies apply to major developments only, the positive impacts of the policy could be maximised if applied to smaller-scale development. It is not possible to amend the policy to widen its application via this guidance. However, in many instances Borough's elect to expand and incorporate the</p>	+ 1

	are women), who are more likely to experience fuel poverty.		Mayor's strategic policies into their Local Plans and the guidance encourages boroughs to apply and adapt the principles of the guidance to smaller scales of development.	
Sexual orientation	None identified.			
People on low incomes	<p>Positive</p> <p>The number of households experiencing fuel poverty has increased with higher fuel costs. The policy and guidance promote high levels of energy efficiency which should result in lower fuel costs for occupants of new developments.</p>	2a	The London Plan carbon reduction policies apply to major developments only, the positive impacts of the policy could be maximised if applied to smaller-scale development. It is not possible to amend the policy to widen its application via this guidance. However, in many instances Borough's elect to expand and incorporate the Mayor's strategic policies into their Local Plans and the guidance encourages boroughs to apply and adapt the principles	+ 1

			of the guidance to smaller scales of development.	
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Overview of equality impacts

Using your findings from the table above, summarise the impacts for each group in the table below using the scoring listed above.

	Age	Disability	Gender reassignment	Marriage and civil partnership	Pregnancy and maternity	Race	Religion and belief	Sex	Sexual Orientation	People on low incomes
Energy Assessment Guidance update	+ 1	+ 1			+ 1	+ 1		+ 1		+ 1

Consider whether to break the guidance down and introduce further rows in order to make clear different equality impacts for different aspects of the guidance.

Amendments to the guidance

(only for review to the EqlA in the future)

Change	Reason for change
What changes have you made to the guidance as a result of this EqlA?	Why have these changes been made?

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 guidance is required This EqlA has not identified any potential for discrimination or negative impact, and all opportunities to advance equality have been taken.	x
Outcome Two	Adjustments to the guidance are required to remove barriers identified by the EqlA or better advance equality.	
Outcome Three	Justify and continue with the guidance 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	

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.

Appendix A: Evidence Reference and Content

London Plan IIA (including EqIA) and Addendums

Evidence

Age

The impacts of more intense and severe weather associated with climate change can have impacts on health across the population, however the impacts on children and older people are be more significant.

[the Intergovernmental Panel on Climate Change \(IPCC\) report 2021](#), states that each of the last four decades has been successively warmer than any decade that preceded it since 1850. It is virtually certain that hot extremes, including heatwaves, have become more frequent and with continued global warming the frequency and intensity of these weather extremes is projected to increase.

[The health effects of hotter summers and heat waves in the population of the United Kingdom: a review of the evidence](#) (2017) Warmer temperatures and longer periods of sunny weather increase the risk of overheating in residential buildings, which has subsequent negative impacts on the heath of occupants. In all assessments of heat-related impacts using different climate change scenarios, deaths are expected to increase due to hotter temperatures, with some studies demonstrating that an increase in the elderly population will also amplify burdens.

Age is also an important factor in relation to the susceptibility to the health effects of air pollution, with younger and older people being more at-risk.

[Equality, diversity and inclusion evidence base for London](#) (2019)

Living in overcrowded and poor-quality housing has a range of negative impacts, particularly for children. Housing quality more generally, including damp, excess heat and cold, and the presence of housing hazards such as lead and asbestos, is linked to a variety of illnesses, with older adults and young children the most at risk.

[The rising cost of living and its effects on Londoners \(2022\)](#) - Over 15 per cent of London households were in fuel poverty in 2019 and with gas prices a key part of high inflation, the £140 increase in the standard tariff in October 2021 put a further estimated 75,000 households into fuel poverty. The figure could rise further with a £600 or more increase in April 2022. [According to BEIS Annual Fuel Poverty Statistics in England \(2022\)](#), in 2020, 40.3 per cent of all fuel poor households had one or more dependent children.

Disability

Disabled people, particularly those who suffer from respiratory conditions may be impacted more by the health effects of air pollution and by the exacerbating impact of climate factors and climate change. Disabled people may also be more impacted by financial factors owing to the fact that this group has higher rates of unemployment, or for working disabled people, are less likely to hold higher paid positions.

[Outcomes for disabled people in the UK: 2021 \(ONS\)](#)

Around half of disabled people aged 16 to 64 years (53.5 per cent) in the UK were in employment compared with around 8 in 10 (81.6 per cent) for non-disabled people (July to September 2021); disabled people with severe or specific learning difficulties, autism and mental illness had the lowest employment rates. Working disabled people were also less likely to work as managers, directors and senior officials or in professional occupations than working non-disabled people.

[Analytical study on the promotion and protection of the rights of persons with disabilities in the context of climate change: 2020 \(UN Human Rights\)](#)

Persons with disabilities are at greater risk from the adverse impacts of climate change owing to a variety of social and economic factors. Poverty, discrimination and stigma are key components that affect the exposure of persons with disabilities to the impacts of climate change. Persons with disabilities are disproportionately affected by the adverse impacts of disasters. Climate change can exacerbate existing health and health care inequalities faced by persons with disabilities and the health impacts of climate change may be experienced more severely by persons with disabilities owing to the harmful impact of climate change on health systems.

According to [BEIS Annual Fuel Poverty Statistics in England \(2022\)](#), Overall an estimated 68.8 per cent of households in fuel poverty are in receipt of benefits. This share rises to 75.4 per cent if disability benefits are included.

Gender reassignment

No evidence was found which is relevant to the Energy Assessment Guidance.

Marriage or Civil Partnership

No evidence was found which is relevant to the Energy Assessment Guidance.

Pregnancy and maternity

Heatwaves and higher average temperatures could impact on pregnant women more than the general population. The findings of [Bekkar, Pacheco, Basu, et al \(2020\)](#) suggest that exacerbation of air pollution and heat exposure related to climate change may be significantly associated with risk to pregnancy outcomes in the US. This research is likely to be applicable to the UK.

Race

The Climate Change Committee suggests that people in poverty are most likely to be affected by the risks and impacts of climate change. [GLA climate risk mapping \(2022\)](#) shows that areas of London with Black, Asian and minority ethnic populations of more than 50 per cent are more likely to face the highest climate risk in London including flooding, exposure to toxic air, heat risk and limited access to green space.

[BEIS National Statistics \(2022\)](#) - levels of fuel poverty split by ethnicity show that more non-white than white households were in fuel poverty in England in 19/21 (12.6 per cent

for white households, 19.1 per cent for other-than-white households) While levels of fuel poverty had been declining across all ethnic groups since 2009, the effect of current increased fuel prices is likely to reverse this trend and can be expected to have a disproportionate effect on non-white ethnic minorities.

Religion or belief

No evidence was found which is relevant to the Energy Assessment Guidance.

Sex

The Climate Change Committee suggests that people in poverty are most likely to be affected by the risks and impacts of climate change. Lone parents are more likely to experience poverty than other household types and 90 per cent of lone parents are women.

[The rising cost of living and its effects on Londoners \(2022\)](#) - Over 15 per cent of London households were in fuel poverty in 2019 and with gas prices a key part of high inflation, the £140 increase in the standard tariff in October 2021 put a further estimated 75,000 households into fuel poverty. The figure could rise further with a £600 or more increase in April 2022. Single parent households have consistently had the highest proportion of households in fuel poverty ([BEIS 2022](#)). In 2020, 26.5 per cent of single parent households were fuel poor likely due to their considerably lower median income but the lowest average fuel gap of £170 due to a high energy efficiency rating.

Sexual orientation

No evidence was found which is relevant to the Energy Assessment Guidance.

Gaps in Evidence

No gaps in evidence identified.

Appendix B: Engagement summary

Summary of protected groups engaged

Already engaged: engagement with and input from industry stakeholders – primarily those who will be involved in the preparation and assessment of Energy Strategies - has taken place during the production of the guidance.

Future engagement: no specific engagements is proposed with groups who share protected characteristics given the technical nature of the guidance.

Engagement record

Engagement undertaken which is relevant to the EqlA for example with specific community groups, or protected characteristic groupings, or to fill identified evidence gaps.

Event details	Specific groups represented	Key findings
N/A	N/A	N/A