

Supporting Just Space's assessment – LGBTQ+ written statement on Equalities evidence.

We write in agreement with and support of the assessment by Just Space that the Integrated Impact Assessment and Addendum Report (NLP/CD/04 & 05) do not credibly indicate that the Plan will help to advance equality of opportunity between people who share a “protected characteristic” as defined in the Equality Act 2010 and those that do not share it and further the other two aims of the Act, with specific reference to members of London's LGBTQ+ population.

The Integrated Impact Assessment (IIA) does not warrant recognition as an Equalities Impact Assessment (EqIA) because it fails to show due consideration of the range of issues relevant to members the LGBTQ+ population detailed in our earlier submission.<sup>1</sup> Subsequent to this submission, we were disappointed not to be approached for further consultation around the areas of concern we raised and are further disappointed to see minimal evidence that our concerns have been recognised as valid or deserving of consideration. We consider that the experience of minority groups in engaging with the consultation on the plan reflects wider problems with the way that it speaks of inclusion even while it fails to effect it.

We do not find it credible simply to assert (a typical example of many relates to S1 Social Infrastructure) that a given policy “supports the provision and enhancement of a range of community infrastructure types” to positive effect without any substantive reference to the real, complex and specific LGBTQ+ needs and aspirations around, for instance, social integration, health inequality, safety and security detailed in our prior submission. Nor is there evidence of engagement with such concerns, including potential negative consequences of proposed policies, around good growth, housing, heritage and the nighttime economy (with the qualified exception of reference to public houses in HC7).

Rather, the real, complex and specific concerns around the needs and aspirations of this population with a protected characteristic are unsatisfactorily subsumed under umbrella terms linking a range of such characteristics such as “LGBT+ communities, BAME groups and young people”. Such umbrella terms do not show any substantive engagement with the specific challenges facing such populations – for example, the negative impact of large-scale transport infrastructure development on LGBTQ+ spaces, even when Equalities Impact Assessments have been carried out, as documented by UCL Urban Laboratory.<sup>2</sup> The research conducted by Urban Lab made clear that Equalities Impact Assessments in some key large-scale urban developments have failed to adequately protect clusters of LGBTQI+ venues, even where other forms of cultural heritage have been recognised. Urban Lab's research on the extent and impacts of venue closures was well received by the Mayor and Night Czar and the latter has frequently cited it.

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<https://www.london.gov.uk/sites/default/files/UCL%20Urban%20Laboratory%20%282231%29.pdf>

<sup>2</sup> <https://www.ucl.ac.uk/urbanlab/research/lgbtqi-space>

Nor do umbrella terms of inclusivity evince any understanding of the complex and intersectional dynamics through which such challenges play out in the lived experience of those affected – that is to say there is no sense of engagement with how existing and proposed policies can disproportionately disadvantage, for instance, disabled queer, trans and intersex people of colour in ways relating to linked concerns around, for instance, housing, transport, safety and culture.

In conclusion, the IIA's failure to consider the specific impact of proposed policies on groups with protected characteristics, including LGBTQ+ people, cannot yield a proper understanding of the potential impact of the Plan and to proceed as if it can would not be lawful. We seek instead a plan that will be world-leading in the concrete and intersectional ways that it addresses inclusivity for those with protected characteristics.

Signed,

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Raze Collective (Tim Crocker-Buqué)

UCL Urban Laboratory, LGBTQ+ Spaces research team (Prof Ben Campkin)