

London Gypsies and Travellers – 255

Supplementary written statement – M2 Equality of Opportunity

25 February 2019

We welcome the opportunity to give further comments on Matter 2 Equality of opportunity considering the Supplementary Equality Impact Assessment information published by the GLA (NLP/EX/17).

It is our view that overall the IIA does not indicate that the London Plan will achieve the Equality duties under s 149 of the Equality Act 2010.

The main criticism, as raised in our previous submission and at the hearing session on 15th January is that the Equality Impact Assessment element of the IIA does not provide sufficient information on the expected impacts of each policy against each of the protected characteristics under the Equality Act. Without this information we consider the decision maker cannot make a sound judgement on whether the Public Sector Equality Duty is being met.

We haven't had the capacity to look at all the supplementary information but have selected a number of policies that are of particular concern – the Good Growth 2 options, D6 Optimising housing density, H1 Increasing Housing supply, H3 monitoring housing targets.

The matrices published as a result of the hearing session appear to be more detailed than the IIA and Addendum which had been submitted as part of the examination, however a closer look reveals the same inadequacies that were previously raised:

- The consideration of impacts on protected characteristics and low income groups is reduced to a list showing Yes or No for each one in the box titled 'Receptors and/or affected groups'. There is no clear justification of how the conclusion was reached other than the general statement in the NLP/EX/17 document that this was informed by the guide questions, 'specific evidence and professional judgement'.

Across the various options for GG2 for example, under Objective 1 the assignment of Y or N to the list of protected characteristics seems random. There is no indication why sexual orientation receives a No under GG2 Current London Plan and GG2 Sustainable intensification, and a Yes under the other three options.

Similarly, it is extremely odd that for policies such as D6 Optimising housing density; H1 Increasing housing supply; H3 Monitoring housing targets for Objectives 1 and 2 Equality and inclusion and Social integration there is no assessment of protected characteristics whatsoever.

A more fundamental issue here is that the Y/N approach continues to aggregate assumptions under the broad categories – leading the reader to think that all races and religions for example are affected in the same way.

- We would have expected to see a detailed justification of the assessment supported by evidence and references to the IIA baseline and other data in the boxes titled 'Summary against overall objective' for each of the policies. Instead this space is taken up largely by text that is copied across a number of the objectives which consists largely of assumptions and sweeping statements along the lines of 'the policy will have x effect...this is particularly important for y,z, etc groups'.

Looking at the GG2 options, we notice that Gypsies and Travellers are mentioned in the summary assessment under objective 5 Housing supply, quality, choice and affordability as part of a list of groups that would potentially benefit from the assumed effects of the different scenarios. However this is only for the option Polycentric approach and Current London Plan and Green Belt release, but not to the preferred option. There is no explanation of how the different policy options would have different effects – but on the face of this, GG2 Sustainable intensification is perhaps not the best approach to advance equality of opportunity for Gypsies and Travellers.

It is of particular concern that policies H1, H3 and D6 don't make any reference to the impacts of these policies on Gypsy and Traveller communities. All the evidence available to the GLA and so many of the consultation responses from Local Authorities point out the significant tensions around the pressure to increase general housing supply and density and the provision of Traveller sites. The high housing targets, requirements to make 'best use of land' and deliverability concerns are quoted by many London Boroughs as barriers to making any provision for Gypsies and Travellers, and furthermore reasons to oppose the London Plan definition of Travellers which clearly meets the s149 requirements of the Equality Act 2010.

- A final point of concern is the lack of 'integration' across the IIA of various assumptions and professional judgements related to groups protected under Equality legislation. This leads to a very fragmented and simplistic analysis that does not address any issues related to intersectionality of the protected characteristics or the complex cumulative impacts of 'headline' policies on others that are more marginal. While it has been pointed out by the GLA that the Plan should be read as a whole, in reality for example the policies driving up general housing delivery are most likely to take priority over specialist accommodation types, social infrastructure and other community uses.

The obvious example for us is the inferior provision of H16 Gypsy and Traveller policy compared to H1 Increasing housing supply, in terms of the lack of targets, monitoring and strong direction to deliver this type of accommodation. In the EqIA table for H16 under objective 6 Sustainable land use, there is a hint to the possible tensions mentioned above: *'Depending how these measures are implemented and managed, they could contribute to positive feelings about the local environment and while unlikely to result in high density development, the policy is suited to making better, more efficient and sustainable use of land'*

This issue is very understated and not mentioned anywhere else in the Plan or the IIA versions that were previously submitted, yet it is of strategic importance to delivering Gypsy and Traveller sites. Similarly, for H12 Housing mix under Objective 6 a potential negative impact is identified 'for groups who are more likely to experience poverty and who are disproportionately impacted by overcrowding' due to increasing density. As a minimum these issues should have been explored in the assessments of GG2 Sustainable intensification which makes an unsubstantiated generalisation that the policy would have a positive effect on all groups, and D6 Optimising housing density which is silent on the issue of equalities.

- We echo points made by others around the difficulty of reading and interpreting these assessments by the general public, and in particular by groups protected under the Equalities act. This has significant implications for the soundness of the IIA process in what regards meaningful consultation.