

**Panel Note No. 7:**

**Equality of Opportunity and the Integrated Impact Assessment**

**Supplementary Written Statement**

Matter 2: Equality of Opportunity

Does the *Integrated Impact Assessment* and Addendum Report 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? In particular, which policies of the Plan will achieve this?

Equalities considerations should be being considered at all stages of the plan making process and therefore throughout the EIP. London has large numbers of vulnerable people, very many of whom fall within one or more of the protected groups, thus the need to discharge this duty in the formation of the London Plan is very high.

The Public Sector Equality Duty requires a public authority to be properly informed before taking a decision. It has been stated by many that the *Integrated Impact Assessment* and Addendum Report were totally inadequate documents and that is why the individual assessments were released. However, with the release of these, it is clear there has been a wholesale failure to analyse the policies' equalities impacts in a rigorous manner as required.

The purpose of the EIA is to fulfil the PSED duty before and at the time when a particular draft Plan is being considered. There is a grave danger that the Panel has an insufficiently open mind to really take on the implications of the inadequacy of the EIA for the Plan, meaning as it does, a complete rethinking of many of the policies as currently constituted, at this late stage.

It is highly likely, that the Panel will insist, as they continue with the policies, that they are taking the equalities statements into account but do not translate the three aims of the PSED into policy changes. They will, of course, state that this is due to differences in planning judgement or opinion and ignore the fact that the Plan lacks a foundation steeped in equalities.

There is not the requisite information in the EIA to enable the Panel to have due regard as required by s149 of the Equality Act 2010. Sweeping statements are made in the EIA about impacts but no evidence from the impact of the previous London Plan are used to support them. In fact, GLA officers were very open at the EIP on matter 15, that monitoring has been very sketchy and needed to be improved. If this Plan is very much continuing the work of the previous Plan without such monitoring information, how can it be said to be based on a satisfactory foundation. Anecdotally many negative impacts are known about, throughout London, not least of which is the lack of really affordable housing for local people. This is totally ignored in the EIA.

Wishful thinking pervades the document, with words like: could, might, possible to indicate positive outcomes. The possible negative outcomes are either ignored or played down substantially and if identified, little thought is given to mitigating the negative effects. There is the very real danger that the Panel will assert that it is sometimes going to be possible to claim that relevant matters should have been investigated more thoroughly but that evidence should nevertheless be proportionate and claim that overall there are no omissions in the evidence base such as to undermine the Plan.

Thus the London Plan fails to discharge the Mayor's duty under S.149 of the Equality Act 2010 and if the Examination in Public continues on the basis of the current EIA it will do so in a discriminatory manner and in bad faith. Therefore, if this Plan is adopted by the Mayor, then it must be challenged by Judicial Review. It is for this reason, I am withdrawing from any further representation at the EIP with Just Space, as I feel the EIP process should be halted at this point to enable the implications of the inadequacy of the EIA to be truly considered in a faithful manner.

Some inadequacies in the EIA are shown in the table below.

## GG2 1 EQUALITY AND INCLUSION

This option focuses on delivering large scale housing in opportunity areas, and high density mixed-use development in town centres. The provision of housing can help to meet a range of social and health needs across London's diverse population. By focussing growth in Opportunity Areas and town centres, the option could also support the protection of green and open spaces. An appropriate supply of high quality housing is particularly important for equalities groups, who can be particularly vulnerable to poor quality housing, overcrowding and barriers to the housing market. BAME people and some religious groups are more likely to be in poor quality or overcrowded housing so this may have particular benefits for them.

Where is the evidence to show that the housing that is being provided is being accessed by poor BAME/religious groups? Isn't the opposite happening , with overcrowding being exacerbated and people being displaced from where they been living and where they may have built up a community?

Where is the evidence that the green and open spaces that are protected are located in areas where poorer people live? Isn't the opposite happening, with the green belt areas protected where there are much fewer poorer people and the Opportunity Areas approach targeting the more deprived areas , reducing the amount of all space available, including green space.

## GG2 3HEALTH & HEALTH INEQUALITIES

The provision of high quality housing, and protection of green spaces through intensification can contribute to a range of positive health and wellbeing outcomes. Access to open space is particularly important for children, people with long-term health conditions and disabilities. Poor access to recreational opportunities can also be disproportionately experienced by low-income households, religious and ethnic minority groups. The protection of green spaces coupled with sustainable transport options could improve access for more deprived parts of the city, and help in tackling health inequalities IS THIS SAYING POOR PEOPLE WILL BE ABLE TO TRAVEL TO THE OUTER GREEN AREAS? People do not have time to do this. They need green spaces to be around them, which the policy of OAs does not encourage.

## GG2 5HOUSING

This option supports the large scale provision of high quality housing in Opportunity Areas and mixed-use developments in town centres. Although the current Plan would help to unlock

growth, it leaves uncertainties in the long term surrounding land capacity for the delivery of housing needs in the future. YES Any insufficient provision of long-term housing would be likely to disproportionately impact equalities groups who are more vulnerable to overcrowding (especially BAME, some religious groups and disabled people and children), poor quality provision that does not accommodate complex needs (e.g. accessible lifetime homes, LGBT\* specific housing), and homelessness. Many groups sharing protected characteristics and those on low incomes are more vulnerable to homelessness.

#### GG2 6 Sustainable land use

The option supports high density housing delivering and mixed use development on brownfield sites, whilst protecting green spaces. This can promote the efficient use of space and regeneration for communities. However, BAME and low income groups (particularly likely to live in social housing) may be disproportionately affected by disruption due to redevelopment. They are also most likely to benefit from additional and upgraded quality housing as a result of redevelopment. THIS IS SIMPLY NOT TRUE Although this options supports transport investment, there are uncertainties surrounding land capacity for the quantum of future housing and employment need required. Similarly, without substantial investment in a range of physical and social infrastructure, high density growth can have a number of adverse impacts on communities. WHERE IS THERE ANY ATTEMPT TO ENSURE THE INFRASTRUCTURE REQUIRED IS ADEQUATELY ASSESSED AND PROVIDED BEFORE THE HOUSING? Any insufficient provision of long-term housing would be likely to disproportionately impact equalities groups who are more vulnerable to overcrowding (esp. BAME, some religious groups and disabled people and children), poor quality provision that does not accommodate complex needs (e.g. accessible lifetime homes, LGBT\* specific housing), and homelessness. Many groups sharing protected characteristics and those on low incomes are more vulnerable to homelessness.

#### GG2 10 ECONOMIC COMPETITIVENESS

The option supports the delivery of housing and mixed-use development in town centres and the CAZ. The focus on growth in town centres and CAZ could support the provision of jobs and employment for disadvantaged groups. Similarly, the increased investment in transport can minimise the barriers to employment. There is uncertainty however surrounding the type of jobs created, and ensuring these can reach the most deprived and disadvantaged communities. WHERE IS THE MONITORING OF THIS? There is also uncertainty in the long term about the ability for this option to deliver housing and employment needs to support future growth. This

could undermine London's economic competitiveness and adversely impact businesses/employment opportunities. Any insufficient provision of long-term housing would be likely to disproportionately impact equalities groups who are more vulnerable to overcrowding (esp. BAME, some religious groups and disabled people and children), poor quality provision that does not accommodate complex needs (e.g. accessible lifetime homes, LGBTQ specific housing), and homelessness. Many groups sharing protected characteristics and those on low incomes are more vulnerable to homelessness.

#### GG2 11 INFRASTRUCTURE

This option supports the delivery of infrastructure to support housing needs, and growth in the CAZ and town centres. Improved accessibility, particularly between residential areas and key services, can be particularly important for equalities groups, who disproportionately face barriers to access, social isolation and severance. Public transport can be particularly important for low income households, pregnant women and those with young children, older people, and those with a long-term health condition or disability. This includes investment in sustainable transport options, which is likely to unlock capacity and improve accessibility for communities.

There are however uncertainties surrounding how infrastructure provision can adequately mitigate high density growth, and ensure equality of opportunities for all groups, including the most deprived parts of the city. WHERE IS THE MONITORING?

#### GG2 14 AIR QUALITY

This option supports investment in transport infrastructure and sustainable transport options. This could encourage a modal shift to more sustainable options, and in turn could help to reduce traffic volumes and congestion across the city. Similarly, high density growth could reduce the overall need to travel. Improved health and wellbeing outcomes associated with air quality are particularly important for those with an existing health condition or disability, young children, and pregnant women. Poor air quality can also disproportionately impact low-income households and the most deprived parts of the city, along with ethnic minorities and religious groups who may be concentrated in these areas.

High density growth does not stop people from owning cars. It just causes huge amounts of conflict about parking. There is a 30% increase in traffic congestion in the most deprived areas from the Redbridge Local Plan, while the more affluent areas will see an actual decrease.

#### GG4 1 EQUALITY & INCLUSION

This option represents a co-ordinated approach to meeting London's long term housing needs, using a combination of temporary housing, market-driven forces, affordable housing delivery, and delivery against identified need (in terms of housing size and type). An appropriate supply and range of housing can help to meet the needs of the most disadvantaged and marginalised communities across London, and can contribute to reducing poverty and social isolation. This is likely to particularly benefit low-income communities, ethnic and religious groups (especially where they correlate with areas of deprivation), older people, and people with a disability and existing health condition.

Where is the analysis about the proportion of the different type of homes both in tenure and size that have been created in the last ten years? Where is the questioning of whether this Plan will continue on in the same vein.

EQUALITY & INCLUSION OPTION AFFORDABLE HOMES GG4 This option focuses specifically on the delivery of affordable housing across London. An appropriate supply of housing at affordable and social rent can help to meet the needs of the most disadvantaged and marginalised communities across London, and can contribute to reducing poverty and social inclusion. This is likely to particularly benefit low-income communities, ethnic minority and religious groups (especially where they correlate with areas of deprivation), older people, and people with a disability and existing health condition. This option however would not specifically support the delivery of the full range of housing types (larger houses, adaptable and accessible options), to accommodate diverse needs across London. The delivery of high levels of affordable housing may also be at the expense of overall housing quantum over the Plan period, and could therefore not fully address overcrowding, homelessness and other barriers to accessing the housing market.

BUT AT LEAST IT WOULD PROVIDE THE HOMES THAT PEOPLE NEED UNLIKE THE OA OPTION

#### GG6 SUSTAINABLE LAND USE

This option represents a co-ordinated approach to meeting London's long term housing needs, using a combination of temporary housing, market-driven forces, affordable housing delivery, and delivery against identified need (in terms of housing size and type). Through a range of interventions, this option is likely to provide the quantum and variety of housing required to

contribute to meeting London's long term housing needs. This options is likely to help promote regeneration through mixed-used and inclusive communities, and accommodate a range of needs across London. More specifically, this option supports the reuse of large brownfield sites, vacant plots, and optimising small sites in a range of locations.

**BUT WE HAVE HAD MARKET RATE HOUSING FOR THE LAST TEN YEARS AND WE DON'T NEED ANY MORE. WHERE IS THE ANALYSIS OF WHAT IT HAS ACHIEVED FOR THE MOST DEPRIVED?**

#### CCG 4 7 DESIGN OBJECTIVE

This option represents a co-ordinated approach to meeting London's long term housing needs, using a combination of temporary housing, market-driven forces, affordable housing delivery, and delivery against identified need (in terms of housing size and type). Through a range of interventions, this option is likely to provide the quantum and variety of housing required to meet London's long term housing needs. This options supports meeting high standards of design, and providing for identified needs, including specialist housing options. This will support with the creation of attractive and inclusive communities. High quality design and an improved built environment can be particularly important for low-income households, ethnic and religious groups (especially where these communities correlate with areas of deprivation), older people, people with a disability or existing condition (including sensory impairments), and pregnant women. Inclusive and safe environments can also be particularly important for LGBTQ communities and Gypsy and Travellers.

**WHERE IS THE EVIDENCE THAT THIS WILL PROVIDE THE HOUSING TO MEET LONDON'S NEEDS. WHERE IS THE QUESTIONING OF WHETHER POOR PEOPLE WILL BE ABLE TO ACCESS THIS HOUSING? WHERE IS THE QUESTIONING OF WHAT HIGH STANDARDS OF DESIGN CAN BE ACHIEVED IN THESE HIGH RISE, HIGH-DENSITY BUILDINGS. THE SAINSBURY REDEVELOPMENT IN REDBRIDGE IS ONE EXAMPLE OF MANY OF HUGE INADEQUACIES IN THE DESIGN.**

#### CCG4 9 CONNECTIVITY

This option represents a co-ordinated approach to meeting London's long term housing needs, using a combination of temporary housing, market-driven forces, affordable housing delivery, and delivery against identified need (in terms of housing size and type). Through a range of interventions, this option is likely to provide the quantum and variety of housing required to contribute to meeting London's long term housing needs. This option supports building housing as part of the development of town centres, and providing homes in well-connected places that will help to sustain local communities. Well-connected development is particularly important for

low-income households, ethnic minority and religious groups (especially where these communities correlate with areas of deprivation), people with a disability or existing health condition, and older people.

**THERE IS NO QUESTIONING OF WHETHER THE SIZE OF THE UNITS AND AFFORDABILITY WILL BE AN ISSUE REGARDLESS OF CONNECTIVITY**

**H1 5 HOUSING** This policy strongly supports a range of interventions to unlock housing delivery, including redeveloping brownfield sites, promoting small sites, intensification and renewal. This includes improving certainty for developers, establishing a consistent housing need assessment methodology and aligning density with current and future transport improvements. This policy also supports the promotion of a range of housing needs, including affordable and accessible units across London boroughs. This is particularly important for groups who are likely to experience poverty and homelessness and who are disproportionately affected by poor quality housing and overcrowding

**BUT TRANSPORT CAPACITY NEEDS TO BE ASSESSED PROPERLY UNLIKE THE ASSESSMENT FOR THE ELIZABETH LINE.**

#### **H1 6 SUSTAINABLE LAND USE**

The policy supports meeting housing needs through higher density developments in areas of good PTAL. **It is unclear however how densification can be managed in a sustainable and equitable way.** More broadly, the policy supports town centre renewal, and brownfield regeneration, which could provide a range of social and economic benefits. The policy also supports the development of surrounding infrastructure to increase proximity to social infrastructure. This could provide opportunities for mixed-use developments. **However high density development and delivery of minimum space standards could impact negatively on and potentially exacerbate issues for groups who are more likely to experience poverty and who are disproportionately impacted by overcrowding. SO WHAT SHOULD BE DONE ABOUT THIS?**

**H1 7 DESIGN** This policy supports a range of interventions to unlock housing delivery, including regenerating brownfield sites, promoting small sites, intensification and renewal. **However, to achieve positive benefits and increase equality, the policy needs to ensure that regeneration and renewal projects support the development of surrounding infrastructure. WHERE IS THE MONITORING PROPOSED TO ENSURE THIS TAKES PLACE??** This could provide opportunities for

mixed-use developments and encourage development to match and integrate with new social and transport infrastructure, increasing services and reducing the need to travel. These policy measures therefore could help to make people feel positive about their local area, and improve the overall quality of the built environment

#### H1 9 CONNECTIVITY

This policy supports a range of interventions to unlock housing delivery, including regenerating brownfield sites, promoting small sites, intensification and renewal. **There is a strong emphasis on promoting high density, mixed-use development in areas of high PTAL, to reduce the overall need to travel and improve access to services, such as offices and retail. THIS ASSUMES THAT THE POOR WILL BE WORKING IN OFFICES AND RETAIL – MOST ARE NOT** Additionally, this policy supports the increase in the use of active transport through the creation of integrated infrastructure within neighbourhoods. While the policy addresses connectivity issues, it does not directly address the need to improve connectivity across the River Thames, particularly in east London. In addition, the encouragement of sustainable and active transport modes has the potential to negatively impact groups that are more dependent on car travel.

**H1 ECONOMIC COMPETITIVENESS** This policy supports a range of interventions to unlock housing delivery, including regenerating brownfield sites, promoting small sites, intensification and renewal. There is a strong emphasis on promoting small house builders, and tackling the construction skills gap. This could encourage training and job creation within the construction industry. **WHERE IS THE MONITORING PROPOSED TO ENSURE THIS HAPPENS?** More broadly, the policy supports mixed-used development, town centre renewal and regeneration which could encourage disadvantaged groups to secure, sustain and progress employment opportunities. However, depending on how these policies are implemented and managed, they could help to provide employment opportunities, particularly for more disadvantaged parts of the city. This policy also supports affordable and active transport, which is accessible and inclusive. The provision of such active transport infrastructure could help to overcome barriers to employment and provide job opportunities for those who are more likely to experience unemployment.

**H1 14 AIR QUALITY** This policy supports high density housing delivery in areas of high PTAL, or planned infrastructure improvements. The provision of high quality transport infrastructure could help to reduce private vehicle use, and associated emissions. Depending on how this policy is managed, it could help to improve localised air quality. Additionally, this policy supports the

promotion of active transport infrastructure and the encouragement of public access to transport, which can benefit air quality through reduced use of private vehicles. The policy supports new homes that are more environmentally sustainable. Improving the energy performance of homes will reduce carbon emissions and waste and improve air quality

JUST BECAUSE AN AREA HAS HIGH PTAL IT DOES NOT MEAN IT HAS SPARE CAPACITY. CURRENT TRANSPORT USAGE SHOULD BE MONITORED. WHERE IS THE RECOMMENDATION THAT AIR QUALITY LEVELS SHOULD BE USED TO HELP DECIDE WHERE MORE DEVELOPMENT IS LOCATED TO ENSURE INEQUALITY IN AIR QUALITY DOES NOT RISE FURTHER?