

Examination in Public – SUPPLEMENTARY Written Evidence Submission

MATTER 2 – Equality of Opportunity

M2. Does the Integrated Impact Assessment and Addendum Report (NLP/CD/04 & 05) 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?

Supplementary written evidence following a review of NLP/EX/17 ‘Supplementary Equality Impact Assessment Information - Response to Panel Note 7’

Trust for London (1296)

We express our thanks to the Panel for seeking the publication of the background assessments which lay behind the published Equalities Impact information in the Integrated Impact Assessment. At issue in the discussion at the Examination in Public on January 15th was whether the GLA and their consultants, Arup, had given sufficient ‘due regard’ to the impact of policies on different groups with protected characteristics to meet the requirements of the Equality Act 2010.

Having read the report ‘Greater London Authority: Integrated Impact Assessment Supplementary Equality Impact Assessment Information’ and reviewed a number of the EqIA matrices, we accept that an assessment has been made of the impact of individual policies on groups with protected characteristics. We acknowledge the iterative process that the IIA went through, and are willing to believe that the IIA discussion had some impact on the development of the Draft New London Plan policies, even if this was indirect or informal, due to some of the same GLA staff being involved in both processes.

We maintain however that the quality of the assessment of the equalities impact in the IIA documents provided is poor, and could be improved in order to confidently meet the requirements of the Act.

1. It is extraordinary to us that, in a series of three-page assessments of the impact of individual policies (we focused on housing), there could be such limited detail on the impact on individual equalities groups. For example, the impact on all BAME groups is reduced to a single ‘+’ sign or a ‘Y’. This implies that the impact on all of London’s different BAME groups is the same, which is not supported by the evidence. Meanwhile the volume of extraneous detail detracts from being able to engage with the assessment.
2. The only place in the key housing policies where the needs of LGBT communities are considered is under ‘supported and specialised accommodation’. This is despite there being a known increased likelihood of LGBT people being in housing need and potentially reduced likelihood of meeting thresholds for statutory homelessness assistance. Again, the only reference to this potential need is in the ‘Y/N’ field on sexuality (which is

mostly registered as a 'N'). This implies that the housing needs of LGBT people have only been considered as relevant where they qualify for supported accommodation.

3. The assessments contain a lot of pro forma text in the qualitative 'summary against overall objective' columns. The effect is highly concerning, and implies a process of box ticking and copying and pasting, rather than thoughtful delivery of a mandated legal process to protect and ensure consideration of the real and differentiated housing needs of protected groups in London.
4. Finally, on page 6 of the 'Supplementary Information' report, there is a reference to the baseline evidence on equalities. This evidence is crucial to the GLA / ARUP's understanding of the needs of and impacts on different groups. However this evidence base is not referenced, and so it is impossible to check its comprehensiveness or sufficiency. We would appreciate, at the minimum, a reference or bibliography for this evidence base, and its publication if it is not already publicly available.

Overall, we retain our concerns that the information published in support of the IIA does not sufficiently assist those with protected characteristics to participate in public life. People must be able to quickly and transparently understand the impacts of key policies on them.

We therefore ask again that the Deputy Mayor commit to producing a plain English summary of the Plan, as well as a more detailed assessment of the impact of policies on different equalities groups. This could be made considerably shorter than the current document, by removing the environmental and habitats information, reducing repetition and focusing in on the key impacts. I have proposed an example of how this might look on the following pages.

EXAMPLE ALTERNATIVE EIA LAYOUT – TRUST FOR LONDON PROPOSAL H10 Redevelopment of existing housing and estate regeneration

Key factors:

- The policy supports the regeneration of London's housing, to support higher density and high quality development.
- There is emphasis within the policy on delivering equivalent or higher densities to increase London's housing stock.
- The policy also encourages estate regeneration and, where possible, to deliver an uplift in affordable housing and re-providing appropriate tenure mixes.

Topic	ST (0-4 years)	MT (5-9 years)	LT (10+ years)	Direct (D) or indirect (I) effects					Temporary (T) or Permanent (P)	Spatial context: Local (L), Greater London (GL), Wider Region (WR)			
EqlA	+	+	+	D					T, P		L, WR		
Obj. No.	Top three most relevant topics	Assessment ++(Significant positive) +(Minor positive) 0(Neutral) -(Minor negative) --(Significant negative)? (Unknown)											Summary of impacts, including cumulative impacts and references
		Low income :	Disability:	Age:	Sex:	Race:	Religion:	Sexual orientation:	Gender reassignment:	Marriage & civil partnership:	Pregnancy & maternity:		
1	Equality and Inclusion	+	+	+	n/a	+	+	n/a	n/a	n/a	n/a	<p>The policy:</p> <ul style="list-style-type: none"> • is likely to promote a culture of equality, and social inclusion, especially for more vulnerable groups and those more likely to be impacted by poverty. • permits residents to participate in the process of regeneration. <p>Add more detail on impacts on particular groups, intersectional effects and references</p>	
2	Social integration	+	+	+	n/a	+	+	n/a	n/a	n/a	n/a	<p>The policy:</p> <ul style="list-style-type: none"> • is likely to promote a culture of equality, and social inclusion, especially for more vulnerable groups and those more likely to be impacted by poverty. • permits residents to participate in the process of regeneration. • will mitigate the potential displacement of those in existing affordable housing, among whom those with protected characteristics can be over-represented. <p>Add more detail on impacts on particular groups</p>	
5	Housing supply, quality, choice and affordability	++	+	+	n/a	+	+	n/a	n/a	n/a	n/a	<p>Summarised above. The policy emphasises maintaining safe, good quality homes.</p> <p>Add more detail on impacts on particular groups, intersectional effects and references</p>	

Reminder: assessment criteria

Equality and Inclusion

To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population

Reduce poverty and social exclusion

Promote a culture of equality, fairness and respect for people and the environment

Promote an inclusive design approach ensuring a barrier free environment for all, especially disabled people

Provide opportunities for Londoners to actively participate in the city's life, decision making and communities

Provide opportunities for Londoners of every background to connect

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Provide opportunities for Londoners of every background to connect

Help to facilitate the delivery of house building that meets the needs to Londoners

Increase the range and affordability of housing

Promote accessible and adaptable homes, improving choice for people who require them

Provide housing that encourages a sense of community and enhances the amenity value of the community

Social integration

To ensure London has socially integrated communities which are strong, resilient and free of prejudice

Housing supply, quality, choice and affordability

To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand