

Appendix 3

Summary of the specific implications of the Plan for each of the 9 groups with protected characteristics

April 2019

1 Introduction

1.1 The purpose of this report

1.1.1 This report has been produced in response to Panel Note No. 7.2: Equality of Opportunity and the Integrated Impact Assessment (March 2019). Specifically, it responds to the requests from the Panel to “provide brief separate outlines of the specific implications of the Plan (both positive and negative) for each of the nine groups with protected characteristics”.

1.1.2 The report does not discuss every policy in the Plan and it is not intended to be exhaustive; instead it aims to highlight key specific implications of the Plan (both positive and negative) from the perspective of each of the nine protected characteristics under the Equality Act 2010. The examples given seek to draw out where there are specific impacts for that protected characteristic in particular.

1.2 Structure of this report

1.2.1 This report takes each protected characteristic in turn and highlights the key potential implications – positive and negative – of the Plan. In order to provide specific implications in a clear and logical format, the narrative is structured within each protected characteristic by the chapters contained in the Plan.

1.3 The protected characteristics

1.3.1 ‘Protected characteristics’ is the legal term used in the Equality Act 2010 to define the groups against whom discrimination is unlawful under The Act. These are:

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation

1.4 **Baseline information**

1.4.1 Baseline information on those who share protected characteristics in London can be found in the evidence base that informed the Plan as well as the other Mayoral Strategies and the associated evidence for those strategies. The Mayor's other strategies are the:

- Mayor's Transport Strategy
- London Environment Strategy
- London Housing Strategy
- London Health Inequalities Strategy
- Economic Development Strategy
- Culture Strategy
- Equality, Diversity and Inclusion Strategy
- Social Integration Strategy
- Skills strategy
- London food strategy
- Sport and physical activity strategy

1.4.2 These Strategies and the London Plan (the Mayor's Spatial Development Strategy) have been developed alongside each other and work together to deliver the same aims. As a spatial strategy, the Plan focuses primarily on what can be delivered through the planning system, much of which is also essential to delivering the other strategies.

1.5 **Good Growth**

1.5.1 The draft Plan seeks to accommodate the vast majority of London's growth within London. There are positive and negative impacts associated with accommodating this growth, just as there are positive and negative impacts for not planning for that growth (which would not necessarily mean the growth would not happen).

1.5.2 One of London's strengths is its diversity, and different communities and areas will be impacted in different ways by the projected level of growth. The Policies in the Plan have been developed to ensure that growth is planned for in a way that takes account of the needs of all Londoners and that, as far as possible – within the constraints of the planning system, national legislation and requirements – any negative impacts of accommodating this level of growth are mitigated.

1.5.3 This approach specifically takes account of, and responds to, the requirements of the Public Sector Equality Duty contained within section 149 of the Equality Act 2010, which requires public authorities in the exercise of the function being undertaken to have due regard to the need to:

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

1.5.4 Chapter one of the Plan includes the Good Growth policies. These provide the overarching policy framework for the Plan. Each sets out a high-level objective, which is a more detailed expression of the Mayor's vision for the future of London within the context of a spatial plan, with the clauses underneath setting out the strategic approach to development in London.

1.5.5 The Good Growth policies contain the key issues that the Mayor considers essential to provide expression to his vision and to give appropriate context to the rest of the policies within the Plan, as well as being policies that can be implemented in their own right, providing an effective strategic framework for the development of Local Plans and Neighbourhood Plans and informing development decisions. Chapters 2 to 11 of the draft Plan provide the topic-specific and spatially-specific policies that are required to deliver the Good Growth policies. Key to this is the delivery of inclusive growth – creating a City for all Londoners.

GG1 Building Strong and Inclusive communities

1.5.6 The Policy establishes the principle that Good Growth is inclusive growth. It sets the framework for the Plan to deliver strong and inclusive communities. This Policy seeks to ensure that all development in London takes account of London's diverse population. In framing the Plan, this Policy seeks to ensure that this approach permeates throughout the Plan and that the specific requirements of those sharing protected characteristics are consistently identified and considered as part of all planning and development across London.

GG2 Making the best use of land

1.5.7 This Policy sets out the Plan's aim to make the best use of land in London, to meet the needs of London's growing population. In particular, it focuses on delivering mixed-use development on brownfield land in places well-connected by public transport, walking and cycling, while seeking to maintain protected open space and take into account what is valued about existing places. The approach seeks to balance the needs of existing

communities and the need to accommodate and integrate London's growing population.

- 1.5.8 The population of London has been growing despite the delivery of homes not keeping pace, and the number of jobs continues to rise. London's population is projected to increase to 10.8 million by 2041. The Plan seeks to meet the vast majority of London's needs for housing and other development within London. This will have many benefits for those with protected characteristics, by helping to ensure the range of housing and jobs are available that Londoners need. However, development and intensification of the scale required will have implications and the resulting change will need to be managed in order to benefit both existing communities and London's growing population, which is a key theme of the Plan and is set out in Policy GG1.
- 1.5.9 The spatial approach adopted in the Plan will mean development and intensification is seen in all parts of the city (with the exception of protected open space). This departs from previous Plans that have focused on intensification of Inner London, with limited intensification of Outer London.
- 1.5.10 The approach in Policy GG2 and the best use of land concept allow the different land use needs to be balanced based on a range of factors, including the needs of specific groups. This will be done in the context of planning to meet challenging housing targets that, as the Plan accepts, will mean some places will change. Policies in the Plan (particularly those in chapter 3) seek to manage that change and part of that process is understanding the impacts of any development at the local level, this includes the specific impacts on those with protected characteristics in the existing and potential new communities.

GG3 Creating a healthy city

- 1.5.11 Policy GG3 is focused on creating a healthy city, to improve Londoners' health and reduce health inequalities. The focus is on ensuring that wider determinants of health are addressed and that the potential impacts of development proposals and development plans are assessed in terms of the mental and physical health and wellbeing of all communities in order to mitigate negative impacts and achieve positive outcomes.
- 1.5.12 Specific elements of Policy GG3 are likely to have a greater beneficial impact on those on low incomes with protected characteristics as they seek to address inequalities. For example, the Policy seeks to minimise inequalities in levels of exposure to poor air quality and improve the access and quality of green spaces.

GG4 Delivering the homes Londoners need

- 1.5.13 London's population is growing and is projected to grow significantly over the Plan period. The implications of house building not keeping pace with population growth and the importance of addressing London's housing crisis are discussed in detail in the Mayor's Housing Strategy, and the specific implications for some groups with protected characteristics are discussed in the associated impact assessment and summarised in relation to Chapter 4 of the Plan in this document.
- 1.5.14 It is considered that seeking to deliver more homes and the delivery of the 50 per cent genuinely affordable housing target will have an overall positive impact. However, the level and tenure of affordable housing that can be delivered is constrained by viability and the availability and conditions of funding. Thus, while providing a potential positive impact on those with protected characteristics in need of affordable housing, the impact of Policies (H5-7) will be constrained as they will not meet all identified need. It should also be noted that the London Plan has no remit over how homes are allocated. The Mayor's Housing strategy sets out how the Mayor is lobbying Government for more funding for genuinely affordable housing, in particular low-cost rent, and the Plan commits to reviewing both the threshold (to determine whether the threshold affordable housing level should increase) and the minimum tenure splits (set out in Policy H7) in 2021.
- 1.5.15 A potential negative (or perceived negative) of more housing development is the impact on transport and social infrastructure. This can be overstated; the population is already growing and thus much of the pressure already exists, even without the additional housing. However, it is clear that planning from the outset for the level of infrastructure needed, as required by the Policy GG4, will be important to delivering Good Growth. This is especially important for some protected characteristics and the impacts for each group are discussed in the summary for Chapters 5 and 9.

GG5 – Growing a Good Economy

- 1.5.16 This Policy sets out explicitly that London's economic success should be shared amongst all Londoners. This Policy seeks to ensure the Plan has a positive impact on all Londoners with a focus on promoting the strength and potential of the wider city region, diversifying the economy and ensuring that employment is in the right locations with public transport to support agglomeration and economic activity. The Plan seeks to promote economic development across the city, providing a range of employment opportunities. Like all the Good Growth Policies, this Policy provides the framework for the rest of the Plan and the key specific impacts on the 9 protected

characteristics are discussed primarily in the summary for Chapters 6 and 7.

GG6 – Increasing efficiency and resilience

- 1.5.17 This Policy is about ensuring that London becomes a more efficient and resilient city. This Policy should have a positive impact on all Londoners, particularly those sharing certain protected characteristics. Like all of the Good Growth Policies, the objectives of this Policy permeate the Plan, but the key specific impacts on the 9 protected characteristics linked to this Policy are discussed primarily in Chapters 3 and 9.

1.6 Funding the Plan

- 1.6.1 Chapter 11 sets out that the level of growth anticipated in the Plan will require significant investment from both the public and the private sector. It sets out the Policy framework for viability and planning obligations and estimates the infrastructure requirements to deliver the London Plan. It is clear that there is a funding gap to delivering the ambitions in the Plan.
- 1.6.2 This document sets out the key positive and negative impacts of the Plan on each of the nine protected characteristics. The assumption made in the summary of impacts is that the requirements and policies of the Plan are delivered, and that the funding is available for the required infrastructure. If this is not the case, the growth in the Plan either will not be met, or it may not result in Good Growth. This will obviously have implications for all Londoners but may also mean that many of the positive impacts of the Plan for specific protected characteristic groups are not realised and/or that mitigation measures against potential negative impacts are not delivered.
- 1.6.3 This may also be an issue on a site by site basis when dealing with development management applications, if the delivery of certain requirements cannot viably be supported. Policy DF1 states that priority should be given to affordable housing and public transport improvements followed by other social infrastructure, affordable workspace, culture and leisure. Many of those with protected characteristics will benefit from the prioritisation of affordable housing and transport infrastructure, but many of the same groups could be negatively impacted if social infrastructure, particularly schools and health care are not delivered. However, as recognised in Chapter 11 of the Plan, whereas transport improvements and affordable housing are very much reliant on planning obligations, other infrastructure types will more typically be funded through Community Infrastructure Level (CIL), which is not negotiated on a site by site basis and so these infrastructure types are less likely to be

affected where individual developments are not able to fully support policy requirements.

- 1.6.4 Moreover, the Policies in the Plan, together with other national and local requirements, have been subject to a viability assessment that has tested the cumulative impact of relevant standards, obligations and requirements to ensure they do not put the implementation of the draft Plan at serious risk^[1]. Moreover, the Plan has a number of policies, notably the approach to affordable housing and viability assessments in H5, H6 and DF1 that seek to ensure that viability is only used as a reason to reduce obligations on a site-specific basis where there are clear circumstances creating barriers to delivery. DF1 is also clear that the borough should determine the weight to be given to a viability assessment, alongside other material considerations, ensuring that developments remain acceptable in planning terms. Viability assessments should be tested rigorously and undertaken in line with the Mayor's Affordable Housing and Viability SPG.
- 1.6.5 The approach taken to viability in Chapter 11, therefore aims to maximise the positive impacts identified for specific protected characteristic groups identified and ensure that Good Growth can be achieved via the Plan policies. This will help to ensure that mitigation measures against potential negative impacts for specific protected characteristic groups that have been incorporated into the draft Plan are delivered.

^[1] Three Dragons/Turner & Townsend/Housing Futures, London Plan Viability Study, Dec 2017 ('LPVS')

2 Age

2.1 Chapter 2: Spatial development pattern

- 2.1.1 Policy SD6 seeks to support the varied role of London's high streets, and Policy SD7 requires boroughs to consider the protection of out-of-centre high streets. Policy SD8 encourages a focus on convenience retailing, social infrastructure, local employment and workspace in District centres, and convenient and attractive access to local goods and services in Local and Neighbourhood centres. London's high streets provide important places for people to gather, particularly for young people not in education, employment or training, and for older people, as they support social interaction and exchange that might not be available elsewhere. High streets also provide flexible job opportunities for younger and older people such as Saturday jobs for young adults and students and part-time work for older Londoners¹. Policies SD6, 7 and 8 therefore provide positive impacts for younger and older Londoners in particular.
- 2.1.2 Older people also tend to place particular value on retail that is convenient and easily accessed, as well as the presence of shopkeepers and service providers who enhance familiarity on the street². Policies SD6-8, complemented by Policy E9, which requires development plans to identify areas under-served in local convenience shopping and to prevent the loss of retail and related facilities that provide essential convenience and specialist shopping, may therefore have positive impacts for older Londoners specifically.
- 2.1.3 Policy SD6 encourages a range of housing within town centres, including specialist older persons housing (complemented by the requirements of Policy H15) and student accommodation, which is more likely to serve younger people. This may therefore have a positive impact on older and younger people living in these specific housing types, enabling them to more easily access facilities and services in town centres.
- 2.1.4 Policy SD6 promotes the delivery of a barrier-free and inclusive town centre environment that meets the needs of all Londoners, including older Londoners. It also promotes schemes such as Shopmobility, which is of particular benefit to older people³. Together with policy D7, which promotes a safe, accessible and

¹ High Streets for All, GLA, September 2017

² Ibid

³ 47% of mobility scooter users are aged 65+ years

<https://www.ridc.org.uk/sites/default/files/documents/pdfs/research-consultancy/Rica%20Mobility%20scooter%20market%20study%20final.pdf>

inclusive public realm, the policy requirements of SD6 are likely to represent positive impacts for older people.

2.2 Chapter 3: Design

- 2.2.1 This chapter promotes a design-led approach to accommodating growth and development, seeks to ensure that planning for new development takes account of what is valued about a place, and seeks to ensure that all new development achieves a good standard of design, meeting or exceeding minimum standards. This will contribute to the creation of environments that are inclusive and accessible, welcoming to people of all ages, that encourage different communities to meet, interact and integrate, and that preserve and enhance the features and services that Londoners value about their city.
- 2.2.2 Only 17 per cent of disabled people were born with their disability⁴ and the majority of disabled people acquire their disability later in life. Around 7 per cent of children are disabled, compared with 18 per cent of working age adults and 44 per cent of adults over state pension age⁵. Given the higher incidence of disability within older age groups, the design policies contained within the plan that specifically seek to improve access and inclusion and remove barriers for disabled people are very likely to result in positive impacts for older people. In addition, there are many older people do not consider themselves to be disabled but who have age-acquired impairments and would also benefit from the approach adopted by the design policies in the plan.
- 2.2.3 Policy D3 requires developments to achieve the highest standards of accessible and inclusive design. The specific requirements of the policy will help to remove the physical barriers to inclusion and participation that many older people experience due to impairments or conditions, ensuring the built environment is designed to accommodate them in a safe and dignified way, resulting in positive impacts for many older people.
- 2.2.4 Policy D1 promotes inclusive, safe and secure environments, reducing barriers to participation for many older people, whether physical or safety related (crime is often cited as a major concern for older people⁶). Policy D1 also highlights the requirement to encourage and facilitate active travel, promoting the use of public transport. People tend to travel less frequently as they get older. Older Londoners tend to make fewer weekday journeys (2.3 journeys on average compared with 2.7

⁴ DWP, Family Resources Survey 2015/2016

⁵ Disability Facts and Figures 2016, Papworth Trust, 2016

⁶ King's College London (2015) An Age Friendly City – how far has London come?

for Londoners overall). This is especially the case among Londoners aged 70-79 (2.4 journeys) and those aged 80 and over (1.6 journeys)⁷. However, buses are a key form of transport for people aged 65 and over, with 61 per cent saying they use the bus at least once a week⁸. These policy requirements are therefore likely to particularly benefit many older Londoners.

- 2.2.5 Policy D7 requires the public realm to be safe, accessible and inclusive, specifically highlighting the need for pedestrian crossings to be accessible and to provide tactile paving and associated dropped kerbs or level access. These requirements represent a positive impact for many older people, specifically those who would benefit from a consistently designed street environment with cues to aid navigation, including blind and partially sighted people, people who require level access, as well as some people with neurodiverse conditions including dementia, as the incidence of all of these conditions increases with age. A focus on desire lines and the placement of regular, convenient and accessible crossings will also benefit older people with ambulant mobility impairments for whom travelling distance is an important consideration.
- 2.2.6 Policy D7 also highlights the importance of inclusive design, as well as consideration of the links to the wider neighbourhood for all pedestrians, including a network of legible, logical, safe and navigable pedestrian routes. This should have a positive impact for many older people including those living with dementia.
- 2.2.7 Policy D7 requires that appropriate shade, shelter and seating are provided to encourage people to spend time in a place. This will be particularly beneficial for older people who may need to stop and rest more regularly. Large areas of public realm, specifically pedestrianised areas, can be a barrier for some older people who rely on personal cars or taxis to travel and need to be dropped off very close to their destination⁹. If their destination is in the middle of a pedestrianised area this could mean extended travelling distances from the nearest vehicle drop off or parking point, potentially representing a negative impact for some. However, some older people prefer pedestrianised areas as they represent a safe area in which they do not have to worry about potential conflicts with vehicles, for example older people with a level of sight or hearing loss.
- 2.2.8 Policies D1 and D7 require that green and open spaces are created for social interaction, play, and relaxation for people of all ages.
- 2.2.9 Policy D1 supports appropriate design to mitigate the adverse impacts of noise and air quality. These features are likely to

⁷ TfL 2015 Travel in London: Understanding our diverse communities page 113

⁸ TfL 2015 Travel in London: Understanding our diverse communities. Page 114

⁹ TfL 2015 Travel in London: Understanding our diverse communities. Page 114

benefit those individuals who could be more susceptible to poorer air quality or who are more sensitive to noise. People with dementia can experience problems identifying what a sound is or picking out one sound from another, causing difficulties in some environments to process and understand what they are hearing and communicate a response, which can lead to feelings of anxiety, frustration, confusion and distress¹⁰.

- 2.2.10 Policy D5 requires new build dwellings to be designed to be accessible and adaptable, or wheelchair user dwellings. Many of the design standards and features contained within the accessible housing standards are of benefit for those older people who may not consider themselves as disabled. Older people age 75+ are most likely to need adaptations to their homes¹¹. Accessible and adaptable homes incorporate features that specifically enable the most common accessibility adaptations to be undertaken cheaply and easily, often allowing people to remain in their homes longer.
- 2.2.11 The requirements in Policies D3 and D11 with regard to fire safety and emergency evacuation represent a significant positive impact for many older people, as people over 65 with reduced mobility, and those who live alone, are more likely to die in a fire¹².
- 2.2.12 Policy D1 also highlights the need to optimise site layout and building design to reduce the risk of overheating, which can impact negatively on older and younger people in particular.
- 2.2.13 Policy D2 ensures that the policy requirements contained within the Plan are successfully implemented via a process of design scrutiny and the provision of information in the Design and Access Statement, as well as the retention of the design quality through the development process to completion. Policy D2 will ensure that ad-hoc decisions taken on-site during construction of a development do not undermine an inclusive design approach or inadvertently create barriers for this group.

2.3 Chapter 4: Housing

- 2.3.1 The overall the aim of the Policies in the Housing chapter of the Plan is to deliver more homes, and more genuinely affordable homes, to meet housing need and contribute to the delivery of mixed and inclusive communities. As all new homes will need to meet the various other Policies in the plan (such as those relating to housing quality, environmental standards, and accessibility) the effective implementation of the Policies

¹⁰ An Age Friendly City: How far has London come? Kings College London, 2016

¹¹ MHCLG (2016) English Housing Survey 2014 – 2015: adaptations and accessibility of homes report

¹² LFEPA (2016) Community Safety Risk Reduction – Targeting and Delivery

contained within this chapter will mean the delivery of more homes that can meet a range of needs and are predominantly located in areas well-connected by public transport. This will increase the amount of London's housing stock that can, in particular, meet the needs of older people and those with young children.

- 2.3.2 Measures to encourage the development of new homes in and around town centres may be of particular value to older people and families with young children, who may be more likely to use or access the facilities and services provided, or, in the case of older people may require these to be located nearby due to mobility impairments. Older people and babies are particularly prone to the effects of excess cold, and thus will also benefit from energy-efficient new homes.
- 2.3.3 Older people are more likely to be disabled or have age-acquired impairments or mobility impairments and are therefore more likely to require the design features provided by accessible housing. Therefore, an increase in homes that meet the requirements of Policy D5 will result in a positive impact for older people as these requirements will increase the chances of older people finding homes that meet their needs. This is also positive for households containing young children, as many of the design features within the accessible housing standards benefit those with young children.
- 2.3.4 Overcrowding is an issue that effects a range of Londoners but is more likely to affect households that include children, thus the increase in housing stock, in particular affordable housing (as overcrowding disproportionately affects those on low incomes), may help alleviate overcrowding. Moreover, Policy H12 is clear that, for low cost rent, boroughs should set requirements for the size of units required and take account of the level of existing overcrowding, thereby helping to ensure that the right sized homes are built in terms of number of bedrooms to meet identified need for low cost rent.
- 2.3.5 However, the level and tenure of affordable housing that can be delivered is constrained by viability and the availability and conditions of funding. While the Plan includes the strategic target for 50 per cent of new homes to be genuinely affordable (H5), this will not provide enough affordable housing to meet all of London's affordable housing requirements in the Plan period¹³. Moreover, many overcrowded households will need low cost rent to meet their needs, but the constraints of viability and funding mean that the Plan only requires a minimum of 30 per cent of the threshold level of affordable housing to be low cost rent (H7), although it does state that the presumption is that low cost rent will be the focus for the element that is left to the borough's discretion. Given the level of need for affordable housing in London (and low-cost rent in particular), the positive

¹³ Mayor of London (2017) London Strategic Housing Market Assessment

impact of Policies H5, H6 and H7 will be constrained as they will not meet all identified need. While this does not mean that an existing overcrowded family will remain so, it does mean that an element of overcrowding is likely to remain across London.

- 2.3.6 The general increase in the overall housing stock, particularly in more affordable areas will also help increase housing choice, which could have positive impacts on families who are currently overcrowded. In addition, the Mayor's Housing strategy sets out how the Mayor is lobbying Government for more funding for affordable housing and in particular low-cost rent and the Plan commits to reviewing both the threshold (to determine whether the threshold affordable housing level should increase) and the minimum tenure splits (set out in Policy H7) in 2021.
- 2.3.7 Intensification of existing housing areas (H2) could be of benefit to older people and people with young families in particular as it may allow them to find a home more suitable for their needs (either directly or indirectly, by providing opportunities for movement in the existing stock¹⁴) while remaining in their current community, thereby maintaining existing support and social networks, providing a potential positive impact for these groups.
- 2.3.8 However, some intensification, particularly where it involves the intensification of existing stock, may not be able to meet the accessible housing standards M4(2) or M4(3) as required by Policy D5, and Policy H2 provides flexibility for homes above the ground floor of developments of fewer than ten units to only meet the M4(1) housing standard, which is not considered to be an accessible housing standard. Therefore, housing schemes that consist of fewer than ten units are less likely to meet the needs of older Londoners and families with young children than those with ten or more units. Because Policy H2 is a new policy approach and promotes a range of types of small housing developments it is not clear at this stage how many homes may only meet M4(1) standard. This should be monitored specifically as part of the general monitoring of the implementation and impacts of this policy.
- 2.3.9 While not promoted by the Plan as a source of housing supply, Policy H10 sets out the approach to the demolition and re-provision of housing, including through estate regeneration. Where redevelopment of housing estates involves demolition,

¹⁴ Older person households are more likely to under-occupy housing than their younger counterparts. 54% of older home owners in London and 16% of older renters are under occupying by 2 or more bedrooms. Ensuring a range of homes are delivered that can meet the needs of older Londoners, within existing neighbourhoods will provide opportunities for downsizing and this in turn could free up family housing for families with children – data shows that 34% of family sized homes (those with 3 bedrooms or more) in London are occupied by households with dependent children.

this will require existing tenants to relocate for a period of time, which can be disruptive and can impact on people's ability to access their community and support networks. This can have negative implications for all age groups, but may be of particular concern for older people and families with dependent children, as these age groups are more likely to rely on local community facilities and support networks. Measures to mitigate potential negative impacts have been developed through the Mayor's other powers, including through the Mayor's London Housing strategy (see Policy 5.3 E) and *Better Homes for People, the Mayor's Good Practice Guide to Estate Regeneration*, which applies to all estate regeneration schemes seeking Mayoral funding. The Good Practice Guide is clear that "when considering the option of demolishing and rebuilding homes, boroughs, housing associations and their partners should always consider alternative options to demolition first."¹⁵ The Plan itself references the guide and Policy H10 stipulates that affordable housing floor space should be replaced on an identical basis where tenants have the right to return, or equivalent basis where they do not. This ensures that existing tenants are able to return, which may be of particular value to older people and families with young children, as well as the new development providing equivalent affordable housing provision for new tenants.

- 2.3.10 Moreover, returning and new tenants are likely to benefit from better quality development that meets all of the other requirements of the Plan (including access, space and safety standards) and, where an uplift is provided, will increase the stock of affordable housing, which will be of benefit to those in need of affordable housing including older people, families with young children and young people who currently form concealed households.
- 2.3.11 Young people are more likely to experience difficulties with housing costs. In a London First survey of London employees, 70 per cent of respondents in the 25-39 age group said that they found the cost of living and working in London difficult and 41 per cent of these said that they would consider leaving London to work elsewhere. Younger Londoners therefore may benefit from an increase in affordable housing and are particularly likely to benefit from investment in intermediate housing options (the average age for shared ownership properties based on 2016/17 CORE Data is 32) and this may help younger Londoners live across London (rather than only in areas where market housing is more affordable), thereby helping to deliver mixed and inclusive communities.
- 2.3.12 Purpose built student accommodation (H17) should have a positive impact for younger people. Policy H17 will ensure

¹⁵ Mayor of London, "Better Homes for People, the Mayor's Good Practice Guide to Estate Regeneration" Page 8

student accommodation not only delivers affordable accommodation but is also suitably located, contributing to mixed and inclusive neighbourhoods. The requirement for affordable student accommodation should have a positive impact for low income students (predominantly 18-21 years old) who otherwise may not be able to study in London given the cost associated with accommodation.

2.3.13 Policy H15 recognises that while most older Londoners will prefer to remain in their own home, some will seek specialist older persons accommodation to meet their needs as they age. The policy provides indicative benchmark targets for specialist older persons accommodation for each borough and encourages boroughs to work positively and collaboratively with providers to identify sites that may be suitable for specialist older persons housing. Policy H15 also requires specialist older persons housing developments to deliver affordable housing, the highest standards of accessible and inclusive design, the Plan's accessible housing standards, and relevant facilities such as mobility scooter storage and charging and pick-up and drop-off facilities. The requirements of this policy will impact positively for older people who wish to live in this type of age-restricted specialist housing, by ensuring it is suitable and relevant for them and facilitating the delivery required to create choice within the market for older people.

2.3.14 Policy H14 states that the delivery, retention and refurbishment of supported and specialised housing should be supported. The policy provides a list of types of accommodation that could come under this definition, including accommodation for specific age groups for example accommodation for care leavers and for young people with support needs. The focus this policy provides should have a positive impact on the accommodation options available to young people.

2.4 **Chapter 5: Social infrastructure**

2.4.1 Good quality social infrastructure in the right places helps to bind communities together through the promotion of social interaction as well as allowing people to lead healthy, active lives. This is important for people of all ages but particularly for older and younger Londoners who tend to rely more on different elements of social infrastructure to support different aspects of their lives.

2.4.2 Policy S1 protects existing social infrastructure where needed and supports the delivery of new facilities that are accessible and inclusive. This will particularly benefit older people through improving access to services and amenities such as health care, day centres, and community centres, as well as children and young people in facilitating access to informal and formal

play spaces, appropriate education facilities, sports and recreation facilities, community centres and youth centres.

- 2.4.3 The Plan promotes more innovative design solutions to facilitate the co-location of services, which could enable increased opportunities for different age groups to interact and form social networks. This can be particularly important for older people who often value and benefit from increased intergenerational interactions. The co-location of services and their accessibility by public transport or walking, cycling (see SD6-SD9 and T2) reduces the number of trips people need to make to access the services they need, which can also particularly benefit young people who are more likely to use public transport (among Londoners aged 11-15, 81 per cent use the bus at least once a week, compared with 61 per cent of all Londoners¹⁶).
- 2.4.4 Facilities and services that are easily accessible can also help decrease the risk of social isolation, which many older Londoners are more likely to experience, often due to the incidence of disability increasing with age and physical barriers within the built environment that can prevent people from experiencing the city in full.
- 2.4.5 Policy S2 requires boroughs to work with CCGs and other NHS and community organisations to understand local health and social care needs and plan for them accordingly, taking into account the implications of service transformation plans and new models of care set out in NHS Forward Planning documents. Policy S2 works alongside a wide range of other policies in the Plan to create an effective policy framework that positively supports the health and wellbeing of Londoners and addresses the wider determinants of health and health inequalities that cannot be solely addressed through the health care provision.
- 2.4.6 Policy S3 set out a framework for the delivery of education and childcare facilities to meet demand and offer educational choice. London faces challenges around the cost and availability of childcare for under-fives¹⁷. Access to affordable, accessible and high-quality childcare (pre-school and school age) provision can play a significant role in children's development and positively influence school-readiness, future educational attainment, economic participation and health. It can also benefit parents, enabling them to go back to work, as well as employers who will be more likely to be able to find skilled and reliable staff because parents are not locked out of the labour market by childcare issues. The policy also encourages the shared use services, which can also benefit families through the co-location of childcare facilities and

¹⁶ Transport for London (2015) *Travel in London: Understanding our Diverse Communities*, pg. 157.

¹⁷ Family and Childcare Trust (2017), *Childcare Survey*

schools, increasing accessibility to services and potentially reducing trips for parents.

- 2.4.7 Policy S3 supports proposals for education and childcare located on sites that can be easily accessible by sustainable modes of travel such as walking, cycling or public transport, are designed to promote the safety and health of children and young people and incorporate outdoor space. Often areas with poorer air quality are more deprived¹⁸. While the policy does not restrict the provision of new education facilities in areas of poorer air quality as that would compound issues of inequality and deprivation, this is mitigated by Policy S11, which requires buildings such as schools where there will be high concentrations of groups such as children and young people to be designed to minimise increased exposure to poor air quality.
- 2.4.8 Policy S4 requires the provision play space. Having access to suitable play spaces can help improve children’s development, health and well-being and in gaining confidence in interacting with their peers and forming social bonds. The policy requires appropriate provision for different age groups, which can help to increase social cohesion through increased interaction between ages. Policy S4 suggests consulting with children and young people to understand the type of facilities most beneficial to them, as well as ensuring that they are designed to be appropriate and relevant for other users such as parents and carers, resulting in a positive impact for children and young people.
- 2.4.9 Policy S6 requires boroughs to secure the provision of free, publicly-accessible toilets. This will positively impact older people for whom these facilities are vital in ensuring that they can retain their dignity and the confidence to participate in community life¹⁹. There will also be positive impacts for parents with young children who may need regular access to toilets at short notice, as Policy S6 specifically highlights the need for suitable facilities including family toilets and baby change facilities.

2.5 Chapter 6: Economy

- 2.5.1 Along with policies in Chapter 2 of the Plan, Chapter 6 supports the provision and protection of workspaces (including offices, industry and retail) in places across London, particularly town centres, the Central Activities Zone and Northern Isle of Dogs, and industrial sites including

¹⁸ GLA (2017) Updated Analysis of Air Pollution Exposure in London and MHCLG (2015) English indices of deprivation 2015

¹⁹ Age UK (2007) Nowhere to Go: Public toilet provision in the UK

Strategic Industrial Locations and Locally Significant Industrial Sites.

- 2.5.2 Policies E4 to E7 support intensification of industrial areas and – in some circumstances – co-location of industry and residential uses. This could have a negative impact on young people and older people due to potential increased exposure to poor air quality and these groups being particularly likely to experience the effects of this²⁰. However, these impacts should be mitigated through the measures in Policy E7 and elsewhere in the Plan, particularly Policy S11. While industrial land is sometimes associated with higher emissions, retention of industrial capacity within London should prevent the displacement of these uses to outside London, which would exacerbate pollution and congestion. This approach therefore represents a potential positive impact for younger and older people.
- 2.5.3 Childhood obesity is a major problem in London. London has the highest level of childhood overweight and obesity in England, with 38 per cent of London's 10-11 year olds overweight or obese compared to 34 per cent nationally²¹. Policy E9 seeks to restrict the development of new hot food takeaways near to schools, and this therefore could have a positive benefit for the health of younger people.
- 2.5.4 Younger people are less likely to be employed and are likely to face less secure and stable employment²². Policy E3A supports the provision of affordable workspace that supports educational outcomes through connections to schools, colleges or higher education. This part of the policy will particularly benefit younger people and represents a positive impact for that specific age group.
- 2.5.5 Policy E3 supports the provision of affordable workspace, including workspace that is tailored toward disadvantaged groups starting up in any sector. While the Plan does not specify the groups to which such workspace could be tailored, the policy allows scope for the delivery of affordable workspaces being tailored toward businesses run by or employing younger people.
- 2.5.6 Policy E10 supports the provision of accessible hotel rooms, including the provision of rooms for people with ambulant mobility difficulties, which are likely to be of particular benefit to older people staying in London.

²⁰ Updated Analysis of Air Pollution in London, Aether, February 2017.

²¹ National Child Measurement Programme - England, 2015-16

²² EHRC (2016) 'Is England Fair: The State of Equality and Human Rights 2016'

2.6 Chapter 7: Heritage & Culture

- 2.6.1 This chapter highlights the importance of London's heritage and culture in shaping its character, recognising the value heritage and culture brings to London's diverse communities.
- 2.6.2 London has a world-class cultural offer, but more needs to be done to help different groups make the most of it. Policy HC5 encourages boroughs to develop an understanding of the existing cultural offer in their areas and consider how it serves different groups of people. As well as helping to promote social integration by bringing different communities together, culture also has a particular role to play in helping to tackle social isolation, which older Londoners, particularly older disabled Londoners, are more at risk of²³).
- 2.6.3 The promotion of London's night-time economy is also important in shaping London's culture. Policy HC6 requires boroughs to develop a vision for the night-time economy and to promote it in appropriate places. A key element of the policy is to encourage a greater diversity of activities and uses to broaden the appeal of the night-time economy to ensure it is appealing and welcoming to a wider range of people, including older Londoners. Given that the incidence of disability increases with age, older Londoners may also face physical barriers to inclusion²⁴. Policy HC6 promotes an integrated approach to the management of the night-time economy and explicitly requires boroughs to improve access, inclusion and safety, and to ensure that night-time economy venues are well-served with safe and convenient transport.
- 2.6.4 Policy HC6 also recognises that there are potential negative impacts of the promotion of the night time economy on residents (which may particularly impact older Londoners and families with young children) and seeks to mitigate against these. This is supported by the requirements of Policy D12. This is particularly important as the draft Plan encourages mixed use development (including housing) in town centres, which is also where development of the night time economy is being promoted.

2.7 Chapter 8: Green Infrastructure

- 2.7.1 The policies in this chapter have the potential to have a positive impact for Londoners, particularly older people and children. Children and older people can be more at risk to the effects of more intense and severe weather associated with climate

²³ King's College London (2015) An Age Friendly City – how far has London come?

²⁴ From good night to great night, A vision for London as a 24-hour city, GLA, 2017

change²⁵. The green infrastructure policies, including Policy G5, through providing urban greening, will help to enhance resilience during extreme weather events such as heat waves, for example by providing cooling and shading.

- 2.7.2 London's green infrastructure can help to tackle poor air quality. For example, plants and trees can intercept pollutants and help to reduce exposure. Age is an important factor in relation to the susceptibility of the health effects of air pollution. Poor air quality can have particular impacts on children and older people²⁶. Through protecting and enhancing London's green features the Plan's green infrastructure policies, and policies such as T2 (Healthy Streets), should help to mitigate some of the impacts of poor air quality and in particular the impacts this can have for children and older people.
- 2.7.3 Fewer children in London regularly visit a park or green space than elsewhere in England²⁷. Policy G4 sets the framework for the identification and protection of open spaces and securing of new open space, including addressing areas of deficiency. The extent of the positive impacts will depend on local circumstances (through the Local Plan process or local planning decisions) however improving the quality, quantity and access to green space can have a positive impact on children within local areas, particularly in areas of deficiency.
- 2.7.4 Policy G8 has the potential to have positive outcomes in relation to access to healthy food, physical activity and social interaction²⁸. The exact benefits of this policy will depend on how it is progressed and implemented through the Local Plan process however it is likely to have a positive impact for all ages, including children and older people, in particular there can be educational benefits of learning about food growing and healthy food for children.

2.8 Chapter 9: Sustainable Infrastructure

- 2.8.1 Age is an important factor in relation to the susceptibility of the health effects of air pollution²⁹. Poor air quality can have particular impacts on children and older people, in particular those with respiratory conditions such as asthma. Policy SI1

²⁵ World Health Organisation 2017, protecting health in Europe from climate change

²⁶ Updated Analysis of Air Pollution in London, Aether, February 2017.

²⁷ Natural England, Monitor of Engagement with the Natural Environment, 2016

²⁸ There is a wide body of literature on the benefits of food growing for health and well-being. Further information can be found at www.sustainweb.org.

²⁹ Updated Analysis of Air Pollution in London, Aether, February 2017.

seeks that developments do not cause new breaches of legal limits of air pollution, undermine other efforts to achieve them as well as meet standards that seek to reduce total pollutant emissions. S11 alongside other policies (e.g. D1 and D2) supports reducing exposure to poor air quality through good design, with a particular attention on preventing or minimising exposure in Air Quality Focus Areas (those areas with particularly high exposure) and in locations likely to be used by large number of people vulnerable to poor air quality such as children or older people. Policy S11, alongside other policies in the Plan (for example S3 which looks to address such issues through design of education facilities) are therefore likely to have a positive impact in relation to air quality, which could be of benefit for children and older people in conjunction with wider measures to tackle air quality identified in the Mayor’s Transport Strategy and London Environment Strategy.

2.8.2 10 per cent of households in London are fuel poor and a significant proportion of households that are fuel poor include children. Older people can also be impacted by fuel poverty³⁰. Policies in the Plan such as S12 aim to provide better insulated, more energy efficient homes which can help to lower costs for heating. These policies also encourage developments to maximise opportunities for on-site electricity and heat production from solar technologies, which will help to reduce energy costs for occupants. These policies can therefore have a positive impact for those who are more likely to be fuel poor, including children.

2.8.3 Children and older people can be more at risk from the effects of severe weather associated with climate change, such as heat-waves³¹. Policies such as S12 and S14 will help to provide buildings that are better able to adapt to changing and more extreme temperatures – for example homes that are better insulated and more energy efficient in winter but can also minimise the adverse impacts of the urban heat island through their design. Through helping to mitigate the effects of more intense and severe weather there are therefore several policies in Chapter 9 which are likely to result in positive impacts for children and older people.

2.9 Chapter 10: Transport

2.9.1 Londoners’ travel behaviour tends to change with age, with different barriers to travel being experienced by older and younger Londoners. The transport policies of the Plan are likely to result in positive impacts for older and younger Londoners.

³⁰ www.gov.uk/government/collections/fuel-poverty-statistics

³¹ World Health Organisation 2017, protecting health in Europe from climate change

- 2.9.2 The Healthy Streets Approach, as set out in Policy T2, seeks to create street environments that can help to encourage walking, cycling and public transport use. This has the potential to have a positive impact on younger and older Londoners in terms of getting around London. Healthy Streets can also help to support active travel, which can be beneficial, as research has shown that younger and older Londoners are less likely than other age groups to meet recommended levels of physical activity³². By managing road congestion and its impact on air quality as London grows, the transport policies of the Plan should also positively impact on young people as they are more susceptible to the health consequences of poor air quality than the general population³³.
- 2.9.3 Many of the policies in the transport chapter aim to reduce Londoners' reliance on car travel, including Policy T6, which seeks to restrict car parking where it is appropriate to do so (in line with the availability of public transport alternatives). This may disproportionately affect some older Londoners as they are more likely to drive a car at least once a week (60% of Londoners aged 65-69 drive weekly compared to 39% of Londoners overall³⁴). However, the Plan aims to mitigate these potential negative impacts by containing policies that increase the attractiveness of walking, cycling and public transport as alternatives to car travel. For example, the most commonly cited barrier to increased public transport use among older Londoners is concern about overcrowded services³⁵. Policy T3 aims to improve capacity and connectivity on the public transport network in order to mitigate crowding on services as London grows. In particular, table 10.1 of Policy T3 contains schemes to enhance the bus network, which is the public transport mode that is used the most by older Londoners³⁶. These measures should therefore contribute to ensuring public transport is a more attractive option and choice for older Londoners. Older Londoners are also more likely to be disabled³⁷ and so may be more reliant on car travel to get around London. More information on the impact of the Plan's transport policies on disabled people can be found in the relevant sections of this report.
- 2.9.4 Policy T2 also seeks to reduce road danger through the design of street environments and measures to encourage walking, cycling and public transport. Given that children and older people are disproportionately affected by road danger³⁸ as they are more likely to sustain more severe injuries if they are

³² British Heart Foundation (2015) Physical Activity Statistics

³³ Aether (2013) Analysing Air Pollution Exposure in London

³⁴ Transport for London (2015) Travel in London: Understanding our Diverse Communities.

³⁵ Ibid

³⁶ Ibid

³⁷ Ibid

³⁸ Transport for London (2014) Pedestrian Safety Action Plan

involved in road traffic accidents, Policy T2 is likely to have a positive impact for these groups.

- 2.9.5 Young Londoners are slightly more likely to feel worried about their personal security when using public transport³⁹, with fear of crime or anti-social behavior more likely to affect young Londoners' frequency of use of public transport than Londoners overall. Policy T2, along with design policies D1, D7 and D10, seek to create street environments that feel safe and secure. This should have a positive impact on young Londoners, helping them to feel more confident using the city's streets. The Mayor's Transport Strategy contains complementary policies aimed at increasing feelings of safety on the public transport network.
- 2.9.6 Policy T2, along with design policies D2 and D7, also seek to promote street designs that encourage cycling, while Policy T5 requires development plans and proposals to support the delivery of cycle parking and a London-wide network of cycle routes to make cycling more convenient. Older Londoners are less likely to cycle; only 8 per cent of Londoners aged 65 or above sometimes use a bike to get around London, compared to 17 per cent of all age groups⁴⁰. Given this, Policy T5 may represent less of a positive impact for older age groups than younger age groups but could still result in positive outcomes and potentially increase the level of cycling in the older population by providing the infrastructure needed to encourage older Londoners to cycle more frequently.

³⁹ Transport for London (2015) Travel in London: Understanding our Diverse Communities

⁴⁰ Transport for London (2015) Travel in London: Understanding our Diverse Communities

3 Disability

3.1 Chapter 2: Spatial development pattern

- 3.1.1 Policy SD6 promotes the delivery of a barrier-free and inclusive town centre environment that meets the needs of all Londoners, including disabled Londoners. Together with policy D7, which promotes a safe, accessible and inclusive public realm, SD6 represents a positive impact for disabled people and will result in the creation of inclusive town centre environments that are welcoming and designed to incorporate features such as seating, which provides benefits for many disabled people with a range of impairments.
- 3.1.2 Personal safety is often a barrier for many disabled people⁴¹. Policy SD6 seeks to improve the safety and security of town centres. Together with Policies D1 and D7, Policy SD6 should help to create town centre environments that are safer and more inclusive, for example through the development of active frontages and appropriate street lighting, the latter providing particular benefits for many disabled people- for example blind and partially sighted people for whom a well-lit street environment is essential.

3.2 Chapter 3: Design

- 3.2.1 Policy D3 requires developments to achieve the highest standards of accessible and inclusive design. The specific requirements of the policy will work to remove the physical barriers to inclusion and participation that many disabled people experience due to their impairment or condition, ensuring that the built environment is designed to accommodate them in a safe and dignified way- therefore resulting in positive impacts for disabled people.
- 3.2.2 Policy D1 promotes inclusive, safe and secure environments, this seeks to reduce barriers to participation for disabled people, whether physical or safety related, resulting in a positive impact for disabled people.
- 3.2.3 D1 also highlights the requirement to encourage and facilitate active travel, promoting the use of public transport. This will benefit and be relevant for some disabled people; for example, blind or partially sighted people who cannot drive due to their impairment and may therefore be more reliant on public transport.

⁴¹EHRC (2016 update) Crime and disabled people: Measures of disability-related harassment

- 3.2.4 Policy D7 requires the public realm to be safe, accessible and inclusive, specifically highlighting the need for pedestrian crossings to be accessible and provide tactile paving and associated dropped kerbs or level access. This should have a positive impact for many disabled people, specifically disabled people who benefit from a consistently designed street environment with cues to aid navigation, including blind and partially sighted people, people who require level access, as well as some people with learning difficulties or cognitive impairments. A focus on desire lines and the placement of regular, convenient and accessible crossings may also benefit people with ambulant mobility impairments for whom travelling distances are an important consideration.
- 3.2.5 Policy D7 also highlights the importance of inclusive design, as well as consideration of the links to the wider neighbourhood for all pedestrians, including a network of legible, logical, safe and navigable pedestrian routes. This should have a positive impact for many disabled people, responding to and avoiding some of the negative impacts for disabled people associated with certain design approaches such as shared space.
- 3.2.6 Policy D7 also highlights the need to ensure appropriate shade, shelter and seating are provided to encourage people to spend time in a place. This may be particularly beneficial for disabled people with ambulant mobility difficulties or conditions that require them to stop and rest more regularly.
- 3.2.7 Large areas of public realm, specifically pedestrianised areas can be a barrier for some disabled people who rely on personal cars or taxis to travel and need to be dropped off very close to their destination due to their impairment. If their destination is in the middle of a pedestrianised area, this could extend potential travelling distances from the nearest vehicle drop off or parking point, which could have a negative impact for some disabled people. However, some disabled people prefer pedestrianised areas due to the nature of their impairment as it creates a safe area in which they do not have to worry about potential conflicts with vehicles, for example blind and partially sighted people or people who are Deaf or hard of hearing who may be less aware of the presence of vehicles around them.
- 3.2.8 D7 promotes the opportunity for cultural activities and organised events in the public realm. This can cause difficulties for some disabled people who rely on consistent navigable routes across or around a space, for example blind and partially-sighted people who may rely on regular learned routes or for people with neurodiverse conditions who may find it more difficult to navigate the changes to the space or experience sensory overload due to the additional activity in the area. For this reason, the policy highlights the need to plan areas taking into account additional uses and an inclusive approach to mitigate potential negative impacts for these groups.

- 3.2.9 Policy D1 supports appropriate design to mitigate the adverse impacts of noise and air quality. These features are likely to benefit those individuals who could be more susceptible to poorer air quality or who are more sensitive to noise. For example, by minimising noise this can make an environment more welcoming for people with neurodiverse conditions, potentially minimising 'sensory overload' for some.
- 3.2.10 Policy D5 should ensure at least 10 per cent of new housing are wheelchair user dwellings with the rest being accessible and adaptable for disabled people with a range of impairments who are not wheelchair users. This policy will result in an increase choice for people who require accessible housing, increasing the proportion of London's housing stock that is suitable for a range of disabled people, and the likelihood of disabled people being able to find accommodation that is suitable for them, resulting in a positive impact for disabled Londoners.
- 3.2.11 The requirements in Policies D3 and D11 regarding fire safety and specifically emergency evacuation represent a positive impact for many disabled people who currently face barriers to inclusion based on a building's ability to accommodate them in an emergency evacuation situation.
- 3.2.12 Policy D10 highlights the importance of boroughs working with other agencies to identify community safety needs and the necessary infrastructure to maintain a safe and secure environment and reduce the fear of crime. Policies D1, D4 and D7 highlight the importance of ensuring that people feel safe. Despite the decrease in the incidence of crime overall, in most cases experience of crime remained higher for disabled people compared with non-disabled people, and more specifically experience of any crime was higher for disabled people with certain impairments⁴². The focus in chapter 3 on creating a safe and secure environment therefore could have positive impacts for disabled people.
- 3.2.13 Policy D2 ensures that the policy requirements contained within the Plan are successfully implemented via a process of design scrutiny and the provision of information in the Design and Access Statement, as well as the retention of the design quality through the development process to completion. This will help ensure that decisions taken on-site during construction do not undermine an inclusive design approach or inadvertently create barriers for this group.

⁴² EHRC (2016 update) Crime and disabled people: Measures of disability-related harassment

3.3 Chapter 4: Housing

- 3.3.1 There are 1.3 million disabled adults in London (using the Equality Act definition of a physical or mental impairment that has a 'substantial' and 'long-term' negative effect on their ability to do normal daily activities⁴³), many of whom face barriers to accessing suitable accommodation that meets their needs.
- 3.3.2 Disabled residents are more likely to be living in poverty. 33 per cent of London households in which someone is disabled are living in poverty, compared to a London average of 25 per cent⁴⁴. Housing affordability is therefore an important issue for many disabled Londoners.
- 3.3.3 The housing policies in the Plan will work to reduce physical barriers for disabled people by encouraging new housing to be delivered in areas that are well connected by public transport and are in close proximity to social infrastructure, health care and public transport facilities. This may be of particular value to disabled people, who may be more likely to use or access the facilities and services provided or may require these to be located nearby due to mobility impairments.
- 3.3.4 Overall the aim of the Policies in the Housing chapter of the Plan is to deliver more homes, including more genuinely affordable homes, to meet housing need and contribute to the delivery of mixed and inclusive communities. Policy D5 requires new build dwellings to be designed to be accessible and adaptable for disabled people and requires the provision of wheelchair user dwellings, which will lead to an increase in the number of market and affordable accessible and adaptable dwellings and wheelchair user dwellings, increasing choice and options for this group.
- 3.3.5 The delivery of small sites and the intensification of existing housing areas (see H2) could be of benefit to disabled people, as it may allow disabled people who require accessible housing to find a home that suits their requirements while remaining in their current community, thereby maintaining existing support and social networks. However, Policy H2 provides flexibility for homes above the ground floor of developments of fewer than ten units to only meet the housing M4(1), which is not considered to be an accessible housing standard, and thus may mean these units are not suitable for disabled Londoners.
- 3.3.6 While not promoted by the Plan as a source of housing supply, Policy H10 sets out the approach to the demolition and re-provision of housing. Redevelopment of housing estates, where it involves demolition, will require existing tenants to relocate for

⁴³ The Equality Act 2010. Section 6.
<https://www.legislation.gov.uk/ukpga/2010/15/section/6>

⁴⁴ New Policy Institute. London's Poverty Profile 2015

a period of time, which can be disruptive and can impact on people's ability to access their community and support networks.

- 3.3.7 Disabled people are more likely to live in social housing⁴⁵ and thus may be disproportionately affected by estate redevelopment programmes and that disruption may be experienced more acutely. This includes upheaval and potentially being housed in temporary accommodation that may be less suitable or accessible for them during that process and being affected by change to established communities and support networks.
- 3.3.8 Measures to mitigate these potential negative impacts of estate redevelopment have been developed through the Mayor's other powers, including through the Mayor's London Housing strategy (see Policy 5.3 E) and "Better Homes for People, the Mayor's Good Practice Guide to Estate Regeneration", which applies to all estate regeneration schemes seeking Mayoral funding. The Good Practice Guide is clear that "when considering the option of demolishing and rebuilding homes, boroughs, housing associations and their partners should always consider alternative options to demolition first"⁴⁶.
- 3.3.9 The Plan itself references the guide and Policy H10 stipulates that affordable housing floor space should be replaced on an identical basis where tenants have the right to return, or equivalent basis where they do not. This ensures that existing tenants are able to return or that the new development continues to provide equivalent affordable housing provision for new tenants. Moreover, returning and new tenants are likely to benefit from better quality development that meets all of the other requirements of the Plan (including access, space and safety standards) and, where an uplift is provided, will increase the stock of affordable housing, which will be of benefit to those in need of affordable housing, potentially including disabled Londoners in need of accessible homes. Policy H14 specifically supports the delivery, retention and refurbishment of supported and specialised housing that meets identified needs. Specific reference is made to the need for reablement accommodation, accommodation for disabled people (including people with physical and sensory impairments and learning difficulties) who require additional support or for whom living independently is not possible, as well as accommodation for people with mental health issues who require intensive support. The policy requires boroughs to undertake assessments of local needs for specialised accommodation and plan to meet that need (whether at local or pan-London level). This will help meet the specific needs of disabled Londoners who require additional

⁴⁵ Nationally 48.5% of households in social rented accommodation include a person with a long term illness or disability

⁴⁶ Mayor of London, "Better Homes for People, the Mayor's Good Practice Guide to Estate Regeneration" Page 8

support for whom living independently is not an option, potentially increasing choice and options for this group.

- 3.3.10 As the incidence of disability increases with age, the provisions of Policy H15 (including the requirement to meet accessible housing standards) should be positive for disabled people who are older and wish to live in age-restricted specialist housing (both market and affordable).

3.4 Chapter 5: Social infrastructure

- 3.4.1 Policy S1 requires boroughs to undertake a needs assessment of social infrastructure to meet the needs of London's diverse communities and plan for it accordingly. Planning for the diversity of London's communities should result in disabled people's requirements being taken into account in these assessments, thereby advancing equality of opportunity and enabling people with disabilities to participate in public life.
- 3.4.2 Chapter 5 policies require the design of social infrastructure to be accessible and inclusive, which should result in positive impacts for disabled people, with social infrastructure being provided that meets their requirements in an inclusive, non-segregated way, whether that is in health facilities, community centres, schools, play space or sports facilities.
- 3.4.3 The policies promote the co-location of services and facilities, which could have a positive impact for some disabled people by providing central hubs where a number of services are situated, potentially minimising trips and travel across a larger area, benefiting disabled people who experience barriers in this regard.
- 3.4.4 Policy S3 highlights the increasing need for provision for children with SEND (Special Educational Needs and Disability) requirements in London. This should result in a positive impact for many disabled children, ensuring that all new schools or learning environments are designed to be barrier free and offer choice for disabled students and those with specific requirements, whether this be in a mainstream school environment or a specialist learning environment. Access to a choice of good quality education is important in improving life chances, which is particularly important for disabled children who may also face barriers to employment as they get older⁴⁷.
- 3.4.5 Policy S4 requires new developments that are likely to be used by children to incorporate accessible routes to existing play provision, schools and youth centres, which will enable disabled

⁴⁷ Disability Facts and Figures 2016, Papworth Trust, 2016

children to play and move around their local neighbourhood safely and independently. In addition to benefitting children and young people who are disabled, parents or carers who are disabled who otherwise may find it difficult to access these play spaces should also benefit from these requirements.

- 3.4.6 Where formal play provision is provided in new developments, it should be free, well-designed, accessible, inclusive and stimulating. This will require an understanding of the needs of disabled children, not just in terms of accessible and inclusive play equipment but also in terms of the design and layout of the space and facilities.
- 3.4.7 Policy S6 aims to increase the provision of public toilets, which will benefit many disabled people with certain conditions who may need to visit toilet facilities more frequently. It also aims to ensure that facilities are suitable for a range of users including disabled people. The requirement for 'Changing Places' toilets that are specifically designed for assisted use recognises that standard disabled persons toilets do not meet the needs of all disabled people, and people with profound and multiple impairments, learning disabilities and some other impairments such as spinal injuries, muscular dystrophy, multiple sclerosis or acquired brain injury often need larger facilities and specific equipment.

3.5 Chapter 6: Economy

- 3.5.1 Chapter 6 seeks to provide sufficient workspace of different types in appropriate locations to meet the growing needs of London's economy. The creation of a strong, dynamic economy has the potential for an indirect positive impact on groups that traditionally face greater barriers to employment and would be lower income groups, including disabled people. While Chapter 6 deals with the provision of workspaces, many of the barriers experienced by these groups are outside the scope of the Plan, but are addressed in other Mayoral strategies, in particular the Economic Development Strategy.
- 3.5.2 Disabled people are disproportionately likely to face barriers to joining the workforce. With 19 per cent of the UK working age population being disabled this makes up a significant share of the population.
- 3.5.3 Policy E1 supports improvements to the quality, flexibility and adaptability of office space of different sizes, which may have a beneficial impact for disabled people, through supporting accessible spaces that could be adapted to suit a disabled persons' requirements, if they do not already, taking into account the policy requirements of Policy D3.

- 3.5.4 Policy E10 requires the provision of accessible hotel rooms for people with a range of impairments, which will result in an increase in the number of accessible rooms and visitor accommodation options in London and therefore increased choice for disabled people who require them, again impacting positively on this protected characteristic group.
- 3.5.5 Policy E9 requires development plans and proposals to prevent the loss of retail and related facilities that provide essential convenience and specialist shopping and requires the identification of areas under-served in local convenience shopping. This may benefit some disabled people for whom longer travelling distances are a barrier to accessing shops and services.

3.6 Chapter 7: Heritage & Culture

- 3.6.1 Policy HC1 encourages the regenerative use of heritage assets, with a particular focus on Heritage at Risk. Aligned with Policy D3, this will particularly benefit disabled people by improving accessibility to the heritage environment in general and heritage assets in particular. As well as physical access, the policy also focusses on the interpretation of heritage assets to make them more accessible to the wider public, recognising that this may need to be presented in different ways. This will particularly benefit disabled people with sensory impairments, neurodiverse conditions and learning difficulties.
- 3.6.2 Many disabled people do not feel able to access the culture available locally due to cost, a lack of information and accessibility issues⁴⁸. Policy HC5 encourages boroughs to develop an understanding of the existing cultural offer in their areas and consider how it serves different groups of people. This should positively benefit disabled people by increasing the range of the cultural offer available to them as well as improving access to the existing offer. Culture can help to promote social integration by bringing different communities together and can often alleviate issues such as social isolation that some disabled people are more at risk of⁴⁹.
- 3.6.3 Policy HC6 requires boroughs to develop a vision for the night-time economy and to promote it in appropriate places. Some disabled people may not feel comfortable going out and about at night either because of physical barriers or a lack of facilities suitable for them. Personal safety is often a barrier for disabled people⁵⁰. A key element of the policy is to encourage a greater

⁴⁸ Taking Part, Focus One: Barriers to Participation, DCMS, 2015

⁴⁹ Economic and Social Research Council (2013/14), Understanding Society

⁵⁰ ECRH, 2016, Crime and Disabled People: Measures of Disability Related Harassment, Page 7

diversity of activities and uses to broaden the appeal of the night-time economy to a wider range of people, including disabled Londoners. Policy HC6 promotes an integrated approach to the management of the night-time economy and explicitly requires boroughs to improve access, inclusion and safety, and to ensure that night-time economy venues are well-served with safe and convenient transport.

- 3.6.4 Policy HC6 also recognises that there are potential negative impacts of the promotion of the night time economy on residents and seeks to mitigate against those. This is also supported by the requirements of Policy D12. This is particularly important as the Plan encourages mixed use development (including housing) in town centres, which is also where development of the night time economy is being promoted.

3.7 Chapter 8: Green Infrastructure

- 3.7.1 The impacts of more intense and severe weather associated with climate change can have impacts on health across the population, however disabled people can be more at risk⁵¹. The green infrastructure policies, including Policy G5, through providing urban greening, will help to mitigate these impacts through enhancing resilience during extreme weather events such as heat waves, by providing cooling and shading, and help to mitigate against flooding by contributing to sustainable urban drainage. A green infrastructure approach as promoted by Policy G1 places additional emphasis on functionality, looking at green spaces and assets in a more integrated way, ensuring a stronger relationship with policies related to climate change adaptation, the benefits of which can help to result in a positive impact for those that can be particularly impacted by the negative effects of intense and severe weather, including disabled people.
- 3.7.2 Policies within the Plan, including G2, G3 and G4, help to protect and enhance green and open spaces within London, which can have positive impacts for disabled people in relation to health and wellbeing as well as increased opportunity for physical recreation. The supporting Policy G3 encourages proposals to enhance access to MOL, addressing poorer quality areas for example by through improving public access for all and levels of access and inclusion via an inclusive design approach. Policy G4 provides for the protection of open spaces and securing of new open space, including addressing areas of deficiency which should help to enhance access to urban green space; the supporting text also highlights encouragement for

⁵¹ World Health Organisation 2017, protecting health in Europe from climate change

improved public access and improved access and inclusion via an inclusive design approach.

- 3.7.3 The extent of the positive impacts will depend on local circumstances (through the Local Plan process or local planning decisions) however alongside Policy D3 the provisions in these policies can help to make green spaces more inclusive in their design. A key element of inclusive design as set out in Policy D3 is that spaces can be used safely – this is important given that disability-related hate crime is a concern⁵². Applying an inclusive design approach to open and green spaces can help to ensure they are convenient and welcoming with no disabling barriers. These policies can therefore help to result in a positive impact for disabled people.
- 3.7.4 Some mental health conditions would come under the Equality Act definition of disability. In addition, disabled people are more likely to experience mental health problems such as anxiety and depression⁵³. Policy G6 can have a positive impact on and mental health in terms of access to nature. Policy G8 through promoting opportunities for food growing through Local Plans also has the potential to have positive outcomes in relation to social interaction, which can have positive outcomes for mental health. The benefits of this policy will depend on how it is progressed and implemented through the Local Plan process.

3.8 Chapter 9: Sustainable Infrastructure

- 3.8.1 Age is an important factor in relation to the susceptibility of the health effects of air pollution⁵⁴. This can include conditions such as asthma that can result in a person belonging to the protected characteristic of disability. Policy SI1 seeks to ensure that developments do not cause new breaches of legal limits of air pollution, undermine other efforts to achieve them as well as meet standards (for example Air Quality Neutral and Air Quality Positive) that seek to reduce total pollutant emissions. SI1 alongside other policies (e.g. D1 and D2) supports reducing exposure to poor air quality through good design, with a particular attention on preventing or minimising exposure in Air Quality Focus Areas (those areas with particularly high exposure). The policies can therefore have a positive impact on people who have a health condition or disability that can be exacerbated by poor air quality.
- 3.8.2 Disabled people can be more at risk from the effects of severe weather associated with climate change, such as heat-waves⁵⁵. Policies such as SI2 and SI4 will help to provide buildings that

⁵² EHRC, 2016, Is England Fairer? The state of equality and human rights in 2016.

⁵³ Mayor of London 2017 Mental health- disabled people and Deaf people

⁵⁴ Updated Analysis of Air Pollution in London, Aether, February 2017.

⁵⁵ World Health Organisation (2017) protecting health in Europe from climate change

are better able to adapt to changing and more extreme temperatures – for example homes that are better insulated and more energy efficient in winter but can also minimise the adverse impacts of the urban heat island through their design. Through helping to mitigate the effects of more intense and severe weather there are therefore several policies in Chapter 9, which are likely to result in positive impacts for disabled people.

3.8.3 Disabled people are among those groups most likely to be fuel poor⁵⁶ and thus policies in the plan such as SI2 that seek to provide better insulated, more energy efficient homes that can help lower costs for heating could be beneficial for this group.

3.8.4 The Waterways policies can help with promoting inclusive access to the river network. For example, the supporting text to Policy SI14 highlights that Thames Strategies should cover inclusive public access and Policy SI16 also aims to secure more inclusive public access and infrastructure along the waterways. More inclusive public access and infrastructure secured by these policies alongside others, for example Policy D3, are likely to have a positive impact for disabled people where they lead to improvements to waterways environments that would previously have been more difficult to access and navigate.

3.9 Chapter 10: Transport

3.9.1 14 per cent of Londoners consider themselves to have a disability that impacts their day to day activities ‘a lot’ or ‘a little’⁵⁷ and 90 per cent of disabled Londoners report that their disability limits their ability to travel⁵⁸.

3.9.2 The Plan aims to create an inclusive street environment. The Healthy Streets Approach (Policy T2) supports the delivery of high quality, inclusive spaces that should prevent and remove barriers for disabled people, and will encourage many disabled Londoners to increase their use of the city’s streets by making them more appealing and accessible to people with a range of impairments, for example by reducing traffic volumes and speeds, making it easier to cross roads, ensuring footways are even and wide, providing lighting and resting points, and allowing inclusive and step free access to bus stops and Tube stations.

3.9.3 Table 10.1, linked to Policy T3, indicatively lists the transport schemes to be delivered over the Plan period and contains schemes that deliver step-free access to the London

⁵⁶ www.gov.uk/government/collections/fuel-poverty-statistics

⁵⁷ Office for National Statistics (2011) Census

⁵⁸ Transport for London, London Travel Demand Survey (2013/14)

Underground, London Rail and National Rail networks. Currently, only 26 per cent of the Tube network is step-free⁵⁹, offering disabled passengers who require level access much less connectivity than the full network. Disabled Londoners who do travel by the public transport network often face longer journey times; an average journey using only bus and step-free stations is estimated to take 13 per cent longer than the average by the fastest available route⁶⁰. By making the public transport network more accessible (which includes enhancing the bus network, expanding step-free access at stations, and increasing the number of accessible trains and interchange facilities on the London Underground as per Table 10.1 and through Policies T1-3), it is likely that Londoners with physical and in some cases sensory impairments will benefit from new travel opportunities and potentially reduced journey times.

- 3.9.4 The parking policies T6, T6.1 and T6.5 ensure that adequate well-designed and suitably-located disabled persons car parking bays are provided. The difference in approach to disabled persons parking compared to general parking recognises that for many disabled Londoners public transport or active travel options are not accessible for them, are that they are therefore more likely to rely on the use of a car. The Plan therefore promotes the provision of disabled persons parking, even in otherwise car free schemes, to minimise potential disadvantage experienced by disabled people who due to an impairment may be more reliant on the use of a car to meet their needs, enabling them to participate in activities and access different places in London.
- 3.9.5 Policy T5 requires development proposals to demonstrate how cycle parking facilities will cater for adapted cycles used by disabled people, ensuring that a lack of suitable cycle parking is not a barrier for disabled people using adapted cycles. Disabled Londoners are slightly more likely to say they have never cycled than people who are not disabled and the proportion of disabled Londoners that cycle sometimes is 3 per cent less than non-disabled population⁶¹. While these differences are not large, ensuring provision of cycle parking is suitable for disabled Londoners who use adapted cycles may help to close the gap and encourage disabled Londoners to participate in cycling.

⁵⁹ Transport for London, *Travel in London 10*, pg. 201.

⁶⁰ Transport for London, *Travel in London 11*, pg. 216.

⁶¹ Transport for London (2015) *Travel in London: Understanding our Diverse Communities*, pg. 232.

4 Gender reassignment

4.1 Chapter 2: Spatial development pattern

- 4.1.1 People who share the protected characteristic of gender reassignment are more likely to be victims of crime than some other members of the population⁶². While the London Plan cannot directly prevent hate crime, harassment or discrimination, Policy SD6 seeks to improve the safety and security of town centres. Together with Policies D1, D7 and D10, Policy SD6 may help to create town centre environments that are safer, for example through the development of active frontages and appropriate street lighting. These policy requirements are therefore likely to have positive impacts for people who share the protected characteristic of gender reassignment.

4.2 Chapter 3: Design

- 4.2.1 Policies D1 and D2 seek to ensure what is valued in a place is identified and strengthened in the future development of the area, this could include trans (coming under the protected characteristic of gender reassignment) identity or culture, although this is not explicitly stated.
- 4.2.2 Policies D1 and D7 require that the design of places and the management of the public realm creates safe, secure and inclusive places. Policy D10 sets out requirements to maintain a safe and secure environment and reduce the fear of crime. As people who share the protected characteristic of gender reassignment are more likely to be victims of crime than some other members of the population⁶³, these policies may therefore result in a positive impact, creating a safe secure environment that people have confidence accessing and using.
- 4.2.3 Policies D1 and D7 also seek to ensure that places, including the public realm, are designed to be inclusive, comfortable and inviting. These policies should also positively impact on those who share the protected characteristic of gender reassignment.
- 4.2.4 Policy D12 requires that Agent of Change principle is applied to new development. This places the responsibility for mitigating the impacts of noise and other nuisances (e.g.

⁶² See assessment of the GLA impact on trans-equality
https://www.london.gov.uk/sites/default/files/assessment_of_the_gla_impact_on_trans_equality.pdf

⁶³ EHRC, 2016, Is England Fairer? The state of equality and human rights in 2016.

noise from a nearby existing pub or club) on the development not the existing noise generating use. London has lost 58 per cent of its LGBT+ night time venues in the past decade⁶⁴, and this policy supports the retention of LGBT+ venues, which will positively impact on many people who share the protected characteristic of gender reassignment who choose to access these venues.

4.3 Chapter 4: Housing

4.3.1 There is limited available data on the housing needs of those who are proposing to undergo, undergoing or have undergone a process (or part of a process) for the purpose of reassigning their sex, but given that people sharing this protected characteristic can face a lack of support from their families and are at high risk of experiencing homelessness and domestic abuse, being able to access suitable housing will be important. Therefore, the overall the aim of the Policies in the Housing chapter of the Plan, to deliver more homes, and more genuinely affordable homes to meet housing need and create mixed and inclusive communities, could be positive as could be the requirements for specialist and supported housing services (H14). However, most of the actions that are key to ensuring housing is inclusive for this particular group are related to how housing is managed, and – where relevant – allocated, and therefore sit outside of the planning system.

4.4 Chapter 5: Social infrastructure

4.4.1 S1 requires boroughs to undertake a needs assessment of social infrastructure to meet the needs of London’s diverse communities, and states that development proposals should be supported where they provide high quality inclusive social infrastructure. This could be of particular benefit for people who share the protected characteristic of gender reassignment, who may face barriers, or not feel comfortable, accessing certain types of social infrastructure, due to a fear of discrimination or past experience of acts of abuse.

4.4.2 Ensuring that social infrastructure is designed inclusively for this group is essential to helping to advance equality of opportunity, reduce discrimination and enable people who share the protected characteristic of gender reassignment to participate in public life fully. For sports and recreation facilities this may include appropriate and well considered design of changing and

⁶⁴ LGBTQ+ Cultural Infrastructure in London: Night Venues, 2006–present, UCL Urban Laboratory

toilet facilities to provide options for this group⁶⁵. The extent to which this is done in practice, however, depends largely on the detailed design, operation and management of these facilities, many of which are outside the scope of the Plan and its policy requirements.

- 4.4.3 For play spaces, supporting text to Policy S4 highlights the need for formal play provision to be inclusive but also that these spaces feel safe and welcoming. In particular, Policy S4 highlights how natural surveillance may contribute positively to feelings of safety and security. Whilst this will benefit everyone, it may particularly benefit some people who share the protected characteristic of gender reassignment – either young adults or by association as parents or carers of children, all of whom may otherwise feel less welcome or comfortable accessing these spaces.
- 4.4.4 People who share the protected characteristic of gender reassignment face particular barriers in relation to health and social care.⁶⁶ There is only one NHS gender identity clinic in London⁶⁷, and this therefore serves a larger-than-local function. Policy S2 requires boroughs to work with CCGs and other NHS and community organisations to understand local health and social care needs, using Joint Strategic Needs Assessments (JSNA) to understand local priorities, and to assess the need for health and social care facilities sub-regionally, and plan for them accordingly. This is likely to benefit many people who share the protected characteristic of gender reassignment by helping to ensure that facilities and services are available to them, however many of the barriers cited by this group relate to staff training and awareness, which are outside the scope of the Plan.
- 4.4.5 Students who share the protected characteristic of gender reassignment also face barriers to education. While Policy S3 sets out a framework for the delivery of education and childcare facilities to meet demand and offer educational choice, many of the barriers relate to discrimination or harassment⁶⁸, which are outside the scope of the Plan.
- 4.4.6 Increasing the supply of public toilets in line with the requirement of Policy S6 will increase the number and proportion of non-gendered public toilets, which will benefit many people who share the protected characteristic of gender reassignment who may otherwise avoid their use due to a lack of choice or relevant facilities, or fear of or past experience of abuse around their choice of gendered toilets.

⁶⁵ Sports England, 2016, Changing rooms Sport, Physical Activity and LGBT

⁶⁶ EHRC, 2016, Is England Fairer? The state of equality and human rights in 2016.

⁶⁷ The Gender Identity Clinic (GIC), part of The Tavistock and Portman NHS Foundation Trust, in Hammersmith

⁶⁸ ⁶⁸ EHRC, 2016, Is England Fairer? The state of equality and human rights in 2016

4.5 Chapter 6: Economy

- 4.5.1 No specific key positive or negative impacts of this chapter have been identified for this protected characteristic.

4.6 Chapter 7: Heritage & Culture

- 4.6.1 Working alongside Policy D1, Policy HC1 requires boroughs to develop an understanding of the value of the historic environment, recognising that local communities provide a valuable source of information in understanding the value of the historic environment and how it contributes to the character and identity of a place. The policies explicitly recognise the influence of past human cultural activity from all sections of London's diverse community. This will act to ensure that the cultural heritage of specific groups is recognised and protected, which could be of specific benefit and represent a positive impact for people who share the protected characteristic of gender reassignment.
- 4.6.2 Policy HC5 encourages boroughs to develop an understanding of the existing cultural offer in their areas and consider how it serves different groups of people, explicitly recognising that LGBT+ Londoners (which includes those who share the protected characteristic of gender reassignment) may currently feel excluded from town centres and night time activities and that this should be considered⁶⁹. This policy protects existing cultural venues and support the development of new ones, and is complemented by Policy HC7 which seeks to protect pubs, recognising that some pubs meet the needs of and provide safe spaces for particular groups including LGBT+ communities. With over half of LGBT+ venues closing since 2006⁷⁰, this will particularly benefit people who share the protected characteristic of gender reassignment.
- 4.6.3 The overall promotion of a more diverse evening and night time economy is also likely to benefit people who share the protected characteristic of gender reassignment in terms of broadening the appeal of the night-time economy to a wider range of people. However, people who share this protected characteristic might feel more at risk at night of verbal and physical attack⁷¹, which can be exacerbated through alcohol

⁶⁹ From good night to great night, A vision for London as a 24-hour city, GLA, 2017

⁷⁰ LGBTQ+ Cultural Infrastructure in London: Night Venues, 2006–present, UCL Urban Laboratory

⁷¹ See assessment of the GLA impact on trans-equality

https://www.london.gov.uk/sites/default/files/assessment_of_the_gla_impact_on_trans_equality.pdf

and drug use. Policy HC6 requires boroughs to work with landowners, businesses and the police to reduce these barriers to the night-time economy such as improving safety and security in town centres and public realm and providing gender-neutral toilets. The availability of safe and convenient public transport near night-time economy venues is also likely to positively benefit people who share this protected characteristic of gender reassignment and Policy HC6 aims to ensure that venues are well-served in this regard.

4.7 **Chapter 8: Green Infrastructure**

- 4.7.1 Hate crime is a particular issue for many people who would share the protected characteristic of gender reassignment, including harassment in public spaces⁷². The supporting text for Policy G3 encourages proposals to enhance access to Metropolitan Open Land (MOL), addressing poorer quality areas such that they provide a range of benefits for Londoners including for example through improved public access for all, recreation facilities and the application of an inclusive design approach. Policy G4 provides for the protection of local open spaces and securing of new open space, including addressing areas of deficiency, which should help to enhance access to urban green space; the supporting text also highlights the importance of inclusive design. Alongside policy D3 (inclusive design) and D7 (public realm) the provisions in such policies can help to make open spaces more inclusive in their design. A key element of inclusive design is that spaces can be used safely, easily and with dignity by all – this is important given that hate crime is of particular concern for this protected characteristic group. The extent of the positive impacts will depend on local circumstances (through the Local Plan process or local planning decisions) however certain green infrastructure policies, alongside other policies in the plan, have the potential to make a positive impact in relation to this issue.

4.8 **Chapter 9: Sustainable Infrastructure**

- 4.8.1 No specific key positive or negative impacts of this chapter have been identified for this protected characteristic.

⁷² EHRC, 2016, Is England Fairer? The state of equality and human rights in 2016.

4.9 Chapter 10: Transport

- 4.9.1 The Healthy Streets Approach outlined in Policy T2 and complemented by design policies D1, D3 and D7 seek to ensure streets are designed to be inclusive and feel safe. People who share the protected characteristic of gender reassignment may be positively impacted by this approach as a 2006 study of transgender people's experiences of discrimination found that 73 per cent of respondents experience harassment in public spaces⁷³.
- 4.9.2 While personal safety on the public transport network is largely outside of the scope of the London Plan, the Mayor's Transport Strategy contains complementary measures that prioritises the tackling of crimes such as sexual offences and hate crime. Many of the barriers to inclusion experienced by people who share the protected characteristic of gender reassignment are likely to be societal and attitudinal barriers, again areas that are outside the scope of the Plan.

⁷³ See assessment of the GLA impact on trans-equality
https://www.london.gov.uk/sites/default/files/assessment_of_the_gla_impact_on_trans_equality.pdf

4.9.3

5 **Marriage and civil partnership**

- 5.1.1 No specific positive or negative impacts of the Plan have been identified for this protected characteristic.

6 **Pregnancy and maternity**

6.1 **Chapter 2: Spatial development pattern**

- 6.1.1 Policy SD6 promotes the delivery of a barrier-free and inclusive town centre environment that meets the needs of all Londoners. Together with Policy D7, which promotes a safe, accessible and inclusive public realm, Policy SD6 will result in the creation of inclusive town centre environments that are welcoming and designed to incorporate features such as seating that could benefit pregnant women and those with very young children.
- 6.1.2 The co-location of services and their accessibility by via public transport or walking, cycling (SD6-SD9 and T2) can benefit women who are pregnant or who have recently given birth, or those with very young children by reducing the number of trips people need to make to access the services they need. This is important as those who are pregnant or have young children often find it more difficult or tiresome to make multiple trips.

6.2 **Chapter 3: Design**

- 6.2.1 The requirements of Policy D3 will work to create environments that are welcoming and comfortable for those who are pregnant or have recently given birth or have very young children. For example, an inclusive design approach will secure level access and suitable door widths and manoeuvring spaces that will be of benefit for those using push chairs. Policy D1 promotes inclusive, safe and secure environments, reducing barriers to participation – whether physical, or related to safety or the perception of safety – which could result in a positive impact for those who share the protected characteristic of pregnancy and maternity.
- 6.2.2 Policy D7 requires development applications to ensure the public realm is safe, accessible, inclusive, with supporting text specifically highlighting the need for pedestrian crossings. These requirements could add to a sense of safety and security by providing a safe place for people to cross with very young children. This is enhanced by supporting text that highlights the

importance of the links to the wider neighbourhood for all pedestrians, with legible, logical, safe and navigable pedestrian routes that are suitable for those using push chairs, which represents a positive impact for those with very young children.

- 6.2.3 Policy D7 also highlights the need to ensure appropriate shade, shelter and seating are provided to encourage people to spend time in a place. This will be particularly beneficial for women who are pregnant who may need to stop and rest more often, and for those with babies or very young children who wish to stop and feed them.
- 6.2.4 Policy D1 supports appropriate design to mitigate the adverse impacts of noise and air quality. These features are likely to benefit those individuals who could be more susceptible to air quality issues and or who are sensitive to noise, providing potential benefits for those with babies or very young children, or for those who wish to sit and feed their baby in a quieter environment. D1 also highlights the importance of providing conveniently located green and open spaces for social interaction, play, relaxation and physical activity, which could have a positive impact on reducing social isolation that some parents of very young children can experience.
- 6.2.5 Policy D5 requires new build dwellings to be designed to be accessible and adaptable, or wheelchair user dwellings. Many of the design standards and features contained within the accessible housing standards are of benefit for those who are pregnant and those with very young children or babies.

6.3 Chapter 4: Housing

- 6.3.1 Policy D5 requires new build dwellings to be designed to be accessible and adaptable and the provision of wheelchair user dwellings. Many of the design standards and features contained within the accessible housing standards are of benefit for those with very young children, for example the provision of level access can assist when using a push chair or pram, and storage areas can help with the storage of these within the home. Given that the policies in this chapter aim to increase housing delivery and the requirements of Policy D5 apply to new build dwellings, the policy requirements may result in a positive impact for those with very young children in terms of the suitability of new build dwellings.
- 6.3.2 Proximity of homes to local services such as healthcare and childcare provision plays a role in enabling women to continue to work during pregnancy and maternity. Facilitating access to local affordable childcare is critical to making work practical and financially viable. Policy H1 supports development in town centre locations, and the development of surrounding

infrastructure to increase the accessibility of social infrastructure.

6.4 **Chapter 5: Social infrastructure**

- 6.4.1 Boroughs are required to undertake a needs assessment to understand existing and future social infrastructure requirements and plan for them accordingly. This should have a positive impact on those who are pregnant or who have recently given birth, or those with very young children, given the increased likelihood during this period of these people accessing health care and other community facilities. Access to services such as sure start centres, community centres that offer play groups and play spaces are particularly important in creating and expanding social networks, particularly during the months after giving birth at a time when women are more at risk of social isolation or health issues such as post-natal depression.
- 6.4.2 The co-location of services and the accessibility to them by public transport, walking or cycling (SD6-SD9 and T2) can also benefit women who are pregnant or who have recently given birth, or those with very young children by reducing the number of trips people need to make to access the services they need. This is important as people who are pregnant or have very young children often find it more difficult or tiresome to make multiple trips.
- 6.4.3 Policy S6 will positively impact on people who are pregnant or have recently given birth by increasing the provision of free publicly accessible toilets, given that pregnant women need to use toilet facilities at more regular intervals, but also increasing options for those with very young children as Policy S6 also requires new toilet facilities to be suitable for families with young children, including providing baby changing facilities.

6.5 **Chapter 6: Economy**

- 6.5.1 No specific key positive or negative impacts of this chapter have been identified for this protected characteristic.

6.6 **Chapter 7: Heritage & Culture**

- 6.6.1 HC6 requires boroughs to develop a vision for the night-time economy and to promote it in appropriate places and promotes an integrated approach to the management of the night-time economy. Some women who are pregnant or have recently

given birth or those with very young children may not always feel comfortable going out and about at night because of physical barriers or concerns around personal safety in relation to the volume of activity and types of uses available at night. Encouraging a greater diversity of activities and uses alongside an integrated approach to management will help to contribute to the safety and perceptions of safety at night of pregnant women or those who have recently given birth.

- 6.6.2 Policy HC6 also recognises that there are potential negative impacts of the promotion of the night time economy on residents and seeks to mitigate against those – this is also supported by the requirements of Policy D12. This is particularly important as the Plan encourages mixed use development (including housing) in town centres, which is also where development of the night time economy is being promoted.

6.7 Chapter 8: Green Infrastructure

- 6.7.1 Poor air quality can have negative impacts during pregnancy affecting both mother and baby. Studies in London have shown that air pollution is having a detrimental impact upon babies' health before they are born and is directly attributable to low birth weight⁷⁴. Green features can intercept pollutants in the air and reduce exposure to poor air quality⁷⁵. Through protecting and enhancing London's green features the Plan's green infrastructure policies, alongside other policies such as T2 (Healthy Streets), can be beneficial in helping to mitigate some of the impacts of poor air quality on women who are pregnant.
- 6.7.2 Extremes of temperature can disproportionately affect women who are pregnant. The green infrastructure policies, including Policy G5, through providing urban greening, can positively impact people who share this protected characteristic by helping to enhance resilience during extreme weather events such as heat waves, by providing cooling and shading.

6.8 Chapter 9: Sustainable Infrastructure

- 6.8.1 Poor air quality can have negative impacts during pregnancy affecting both mother and baby. Studies in London have shown that air pollution is having a detrimental impact upon babies' health before they are born and is directly attributable to low

⁷⁴ BMJ, 2017, Impact of London's road traffic air and noise pollution on birth weight: retrospective population based cohort study

⁷⁵ Royal Horticultural Society (2011), Gardening matters: Urban gardens.

birth weight⁷⁶. Policy SI1 seeks that developments do not cause new breaches of legal limits of air pollution, undermine other efforts to achieve them as well as meet standards (for example Air Quality Neutral and Air Quality Positive) that seek to reduce total pollutant emissions. SI1 alongside other policies (e.g. D1 and D2) supports reducing exposure to poor air quality through good design, with a particular focus on preventing or minimising exposure in Air Quality Focus Areas (those areas with particularly high exposure) and in locations likely to be used by large number of people who would be particularly vulnerable to poor air quality.

6.8.2 Alongside these measures there are wider policies in the plan aimed at improving air quality and reducing emissions (for example the transport policies in the plan). In addition to measures to tackle air quality identified in the Mayor’s Transport Strategy and London Environment Strategy, policies in the plan which address air quality are therefore likely to have a positive impact on women who are pregnant.

6.8.3 Extremes of temperature can disproportionately affect women who are pregnant, policies such as SI2 and SI4, alongside policies such as D7 and T2, will help to provide buildings and spaces that are better able to adapt to changing and more extreme temperatures. For example, homes that are better insulated and more energy efficient in winter but can also minimise the adverse impacts of the urban heat island through their design. Through helping to mitigate the effects of more intense and severe weather there are therefore several policies in Chapter 9 which are likely to result in positive impacts for people who share this protected characteristic.

6.9 Chapter 10: Transport

6.9.1 Many of the transport policies within the Plan are likely to have positive impacts for women who are pregnant or who have recently given birth and those with very young children. Policy T2 – working alongside design Policies D1, D3 and D7 – ensures that streets are designed to create welcoming, comfortable and accessible environments. Policy T2 requires development proposals to demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators. While all the indicators will contribute to making street environments more appealing to pregnant women or parents in general, some may be particularly beneficial, for example, ‘places to stop and rest’, ‘shade and shelter’ and ‘easy to cross’ for women who are pregnant who may need to stop and rest

⁷⁶ BMJ, 2017, Impact of London’s road traffic air and noise pollution on birth weight: retrospective population based cohort study

more often, for those with very young babies who wish to stop and feed them, and for those crossing streets with push chairs.

- 6.9.2 The Policies in this chapter seek to achieve the strategic target of 80 per cent of all trips to be made by foot, cycle or public transport by 2041. This will take many trips away from more polluting modes of transport, and will contribute to reducing air pollution in the city⁷⁷, which will be of particular benefit for those covered by this protected characteristic as air quality can have negative impacts during pregnancy, being directly attributable to low birth weight⁷⁸.
- 6.9.3 Policies T1, T3 and T4 aim to mitigate the impacts of a growing population on the public transport network. Managing future levels of crowding by improving transport capacity and connectivity should have a beneficial impact on those who share the protected characteristic of pregnancy and maternity by helping make public transport journeys more comfortable. Table 10.1 linked to Policy T3, which indicatively lists the transport schemes to be delivered over the Plan period, contains schemes and works that increase the accessibility of the public transport network (for example, step-free access to London Underground stations and more accessible vehicles). This will have a beneficial impact for women who are pregnant or who have recently given birth and those with very young children, as they may benefit from the provision of level access, particularly when travelling with push chairs⁷⁹.

⁷⁷ Transport for London, Strategic Modelling Report

⁷⁸ BMJ, 2017, Impact of London's road traffic air and noise pollution on birth weight: retrospective population based cohort study

⁷⁹ Transport for London (2015) Understanding Our Diverse Communities.

7 Race

7.1 Chapter 2: Spatial development pattern

- 7.1.1 There are clear spatial trends when looking at where in the capital London's ethnic groups live. Some outer London boroughs, such as Bexley, Bromley, Havering, Richmond, and Sutton have a population consisting of over 70 per cent from a white British background. Boroughs in the east – notably Newham, Redbridge and Tower Hamlets – have a population with over 40 per cent of residents from an Asian background, and some boroughs – Brent, Ealing, Harrow and Hounslow – in the north east of London have similar proportions of Asian residents. There are high proportions of black residents in south east London boroughs – Croydon, Lambeth, Lewisham and Southwark – as well as north and north east London, notably Barking and Dagenham, Enfield, Hackney, Haringey, Newham, and Waltham Forest. Within boroughs there are also uneven spatial distributions of different ethnic groups⁸⁰.
- 7.1.2 Many of the areas identified in Policy SD1 as Opportunity Areas overlap significantly with some of the places in London where there are higher concentrations of residents from BAME backgrounds. The Opportunity Areas are intended to see significant growth and development to meet the housing and employment needs of London's growing population. This could result in significant change in these areas, much of which – including delivery of new housing (including genuinely affordable housing), employment opportunities, and transport infrastructure and upgrades – could have positive impacts for existing residents including in those areas where there are high BAME populations. There is the potential, however, that the scale of development in these areas could result in displacement of existing residents and communities, local shops and services, higher rents, or development that does not take account of what is valued in an area. The Plan as a whole seeks to mitigate these potential negative impacts of development where possible through the planning system, while delivering the positives of new homes and jobs to meet need. Policy SD1 in particular promotes mixed and inclusive communities, supports wider regeneration, seeks to tackle spatial inequalities, and requires planning frameworks to be undertaken through public and stakeholder consultation.
- 7.1.3 Many of the Strategic Areas for Regeneration identified in Policy SD10 also overlap with places in London where there are higher concentrations of residents from BAME backgrounds, and the Opportunity Areas identified in Policy SD1. Policy SD10 requires Local Plans to develop policies that are based on a thorough understanding of the demographics of communities

⁸⁰ GLA Economics (2016) Economic Evidence Base 2016

and their needs, and to contribute to regeneration by tackling spatial inequalities and environmental, economic and social barriers. Given the distribution of Strategic Areas for Regeneration and the higher proportions of BAME residents in these areas, it is likely that policy SD10 would have a positive effect on people from BAME backgrounds.

- 7.1.4 Policy SD9 encourages the development of town centre strategies, tailored to the needs of individual town centres. Policy SD6 supports the varied role of London’s high streets, and Policy SD7 asks boroughs to consider the protection of out-of-centre high streets. High streets provide valuable informal types of participation and support structures, with shops acting as important hubs and creating informal networks of communities along ethnic and cross-cultural lines. High streets with high levels of ethnic diversity correlate with the use and value of an ethnic food offer⁸¹. These policies may therefore have a positive impact on those BAME communities that rely on access to specialist shops and services and the informal networks that high streets can provide.

7.2 Chapter 3: Design

- 7.2.1 Policy D2 requires the demographic make-up of an area to be incorporated into a borough’s understanding of the area’s character and to be used to inform its development plans. This policy requirement will help ensure local plans are based on an understanding of the different populations and communities, including BAME groups, which make-up an area. D2A and B will require engagement with local communities to understand what they value in the area and provides the opportunity for them to shape the development their local area.
- 7.2.2 Policies D1 and D7 require development to be designed to encourage and facilitate walking and cycling, as well as providing green and open space for play, and physical activity. These measures will positively impact on everyone but more specifically on Black and Asian children who are more likely to be overweight or obese⁸², by encouraging and providing the facilities to allow people to lead more active lives.
- 7.2.3 BAME Londoners are at higher risk of social isolation⁸³ than other groups. Policies D1, D3 and D7 encourage the creation of inclusive places that support and are designed to

⁸¹ High Streets for All, GLA, September 2017

⁸² National Health Service (NHS), 2015-16, National Child Measurement Programme – England

⁸³ See GLA [Social Integration Headline Measures](#) for data for 2011/12 and 2013/14

enable social interaction and thus should positively impact on BAME people.

- 7.2.4 BAME people are more likely to be victims of hate crime, feel unsafe in their local area and worried about physical attack and acquisitive crime than white people⁸⁴. Policies D1, D3 and D7 require that the design of places and the management of the public realm create safe, welcoming, secure and inclusive places. Policy D10 also sets out requirements to maintain a safe and secure environment and reduce the fear of crime. Thus, these policies should positively impact on BAME Londoners by creating places that feel comfortable and safe.

7.3 Chapter 4: Housing

- 7.3.1 BAME groups are likely to benefit from an increased supply of homes in general, and genuinely affordable homes in particular, because they are more likely to be in poverty and/or in overcrowded housing⁸⁵. This suggests the Policies in the Plan that seek to deliver more housing, and more genuinely affordable housing in particular, may be positive for this group by increasing the stock and opportunities to meet housing need.
- 7.3.2 The level and tenure of affordable housing that can be delivered is constrained by viability and the availability and conditions of funding, thus while Policies H5-7 will provide a potential positive impact on those in need of affordable housing, the impact of these policies will be constrained as they will not meet all identified need.
- 7.3.3 There is a large number of distinctive communities concentrated by ethnicity across London, both historic and new. These are not fixed in time and space and many have changed considerably over time, but they often play an important role in community identity and social cohesion. Policies that encourage housing development (including H1 and H2) may change the nature of an area as the introduction of new residents may mean the composition and ethnic make-up of the population changes. This could have implications for the communities, such as the type of amenities and services offered. Some BAME groups rely on clusters of specialist shops and amenities to meet their specific needs, and increased development in an area can lead to those shops being priced out of an area (either directly through redevelopment or indirectly through new businesses coming into an area who can afford to pay more for retail units etc). However, the application of other Policies in the Plan, in particular GG1, SD1, SD10 and D2, will mitigate some of the potential negative impacts and ensure that the needs of

⁸⁴ EHRC 2016. Is England Fairer? The state of equality and human rights 2016

⁸⁵ New Policy Institute. London's Poverty Profile 2015 (2011 Census)

the existing and new communities are considered at the local level when producing development plans and assessing applications. Moreover, negative impacts can also be felt as a result of the needs of a growing population not being planned for. Pressure of a growing and changing population on the existing stock of retail and commercial premises for example could lead to increased rents, having the same impact on existing occupiers as described above and, where housing supply is constrained, may be more likely to be impacted by rising house prices and rents as BAME Londoners are more likely to live in households with an average annual income below £20,000 and are twice as likely to rent privately than white British people⁸⁶.

- 7.3.4 BAME groups are more likely to live in social housing⁸⁷ and are therefore more likely to experience potential negative impacts arising from temporary or permanent relocation caused by redevelopment of existing social housing estates. While not promoted by the Plan as a source of housing supply, Policy H10 sets out the approach to the demolition and re-provision of housing, including through estate redevelopment. Redevelopment of housing estates, where it involves demolition, will require existing tenants to relocate for a period of time, which can be disruptive and impact negatively on residents' ability to access community and support networks. Measures to mitigate potential negative impacts have been developed through the Mayor's other powers, including through the Mayor's London Housing strategy (see Policy 5.3 E) and *Better Homes for People, the Mayor's Good Practice Guide to Estate Regeneration*, which applies to all estate regeneration schemes seeking Mayoral funding. The Good Practice guide is clear that "when considering the option of demolishing and rebuilding homes, boroughs, housing associations and their partners should always consider alternative options to demolition first."⁸⁸ The Plan itself references the Good Practice guide and Policy H10 stipulates that affordable housing floor-space should be replaced on an identical basis where tenants have the right to return, or equivalent basis where they do not. This ensures that existing tenants are able to return and that the new development continues to provide equivalent affordable housing provision for new tenants. Moreover, existing and new tenants are likely to benefit from better quality development that meets all of the other requirements of the Plan (including access, space and safety standards) and where an uplift is provided this will increase the stock of affordable housing, which will be of benefit to those in need of affordable housing.

⁸⁶ Office of National Statistics – 2011 Census

⁸⁷ The 2011 census shows that 26.9 per cent of London's BAME population lived in social housing in 2011 compared to 21.3 per cent of the white British population. Office for National Statistics. 2011 Census.

⁸⁸ Mayor of London, "Better Homes for People, the Mayor's Good Practice Guide to Estate Regeneration", Page 8

- 7.3.5 BAME households are more likely to live in overcrowded accommodation than white households⁸⁹ and overcrowding is most severe among Pakistani, Bangladeshi and black African households⁹⁰. Therefore, BAME groups may benefit from policies that promote the delivery of a range of unit sizes (H12) and specifically the size of low cost rented homes required to meet identified needs (policy H12 C). Also, the delivery of a range of sized homes, including one and two bed homes, can have a positive impact insofar as they can provide the opportunity for new households to form, potentially releasing larger homes currently occupied by sharers, and this could indirectly benefit BAME communities many of whom have larger families and require larger properties.
- 7.3.6 Evidence suggests that older BAME people are growing more concerned about their housing needs, especially those from communities with low levels of home ownership⁹¹, thus Policy H15 that seeks to deliver more specialist older persons housing including affordable specialist housing, which may have a positive impact on this group.
- 7.3.7 Gypsies & Travellers experience the under-provision of pitches across London. Around 85 per cent of Gypsy & Traveller families in London have been forced to live in housing or roadside encampments due to lack of suitable pitches. This has a negative impact on the health and wellbeing of Gypsies & Travellers in London. Policy H16 is likely to have a beneficial impact by increasing the provision of Gypsy & Traveller pitches via a new more comprehensive definition to be used when assessing need, the requirement for boroughs to undertake audits of existing provision and via the requirement for new pitches to be accessible and adaptable to ensure they are suitable for a range of users including disabled and older people, and families with young children. H16 also requires re-provision where existing pitches are lost, and the need to take into account existing family and community groupings when considering relocation and re-provision.

7.4 **Chapter 5: Social infrastructure**

- 7.4.1 Social infrastructure has a key role in supporting inclusion. The Plan aims to ensure that there is adequate social infrastructure in place to support growth which in turns helps to promote social integration.

⁸⁹ EHRC (2016) 'Is England Fair: The State of Equality and Human Rights 2016'

⁹⁰ Shelter (2013) People living in bad housing – numbers and health impacts

⁹¹ A Sense of Place, Retirement Decisions Amongst Older BME People, Runnymede, 2012

- 7.4.2 Policy S1 requires boroughs to undertake a needs assessment of social infrastructure to meet the needs of its diverse communities and plan for it accordingly. Where proposals would lead to a loss of social infrastructure, the Plan states that they should be resisted unless there is adequate alternative provision put in place or if it is part of a plan to upgrade existing provisions. This could be particularly beneficial to some ethnic groups who may depend on certain specific types of social infrastructure that are not always provided within a local area. BAME households may be more reliant on social networks, faith and cultural facilities and may be reluctant to relocate to neighbourhoods where they may be isolated or subject to hostility or harassment.⁹²
- 7.4.3 Policy S2 requires boroughs to work with CCGs and other NHS and community organisations to understand local health and social care needs and plan for them accordingly, taking into account the implications of service transformation plans and new models of care set out in NHS Forward Planning documents.
- 7.4.4 Evidence suggests there is a greater need for mental health services for specific ethnic groups, and that some ethnic groups have more complicated needs and requirements⁹³. For example, Gypsies and Travellers are more likely to experience poor health, and these issues are exacerbated by the fact that many Gypsies and Travellers are not registered with GPs⁹⁴. Policy S2 promotes an integrated service delivery approach in the provision of health and social care, which is important in addressing specific health conditions and providing preventative care. This will particularly benefit certain groups covered by this protected characteristic, including Gypsies and Travellers who may face barriers in terms of access to health and care services. Other policies within the Plan also work in tandem with preventative care measures to tackle health issues that cannot be solely addressed through health care provision.
- 7.4.5 London faces significant challenges around the cost and availability of childcare for under-fives⁹⁵. Access to affordable, accessible and high- quality childcare (pre-school and school age) provision can play a significant role in children's development and positively influence school-readiness, future educational attainment, economic participation and health. Policy S4 sets out a framework for the delivery of education and childcare facilities to meet demand and offer educational choice. This is particularly beneficial for BAME groups, with

⁹² Joseph Rountree Foundation, 2007, Cole Ian and Flint John Demolition, Relocation and Affordable Rehousing – Lessons from Housing Market Renewal Pathfinders .

⁹³ EHRC 2016, "Is England Fairer? The state of equality and human rights 2016.

⁹⁴ *ibid*

⁹⁵ Family and Childcare Trust (2017) Childcare Survey

parents of Black or Indian children reporting particular difficulties in finding flexible affordable childcare⁹⁶.

- 7.4.6 While ensuring a choice of good quality education is important for all children, it will be particularly beneficial for some BAME groups where it is shown that attainment levels are lower than other ethnic groups, and they are therefore more likely to face barriers to employment later in life.
- 7.4.7 Policy S5 sets out a framework to facilitate the provision of a sufficient supply of good quality sports and recreation facilities. There is a focus in the policy on ensuring provision helps to tackle inequality of access, particularly in areas or for groups with low participation. This will particularly benefit some BAME groups who on average less likely to be physically active than other Londoners⁹⁷. Discrimination can also act as a key barrier to participation. While on its own Policy S5 will not increase participation levels, combined with other initiatives set out in the Mayor's Sports Strategy, the policy will help to promote sport and recreational opportunities.

7.5 Chapter 6: Economy

- 7.5.1 Chapter 6 seeks to provide sufficient workspace of different types in appropriate locations to meet the growing needs of London's economy. The creation of a strong, dynamic economy has the potential for an indirect positive impact on groups that traditionally face greater barriers to employment and who would be lower income groups, including those from BAME backgrounds.
- 7.5.2 Some BAME groups are particularly likely to have no qualifications and face barriers to employment. This is the case for more than half of all Gypsies or Travellers, and one in four Londoners from Bangladeshi backgrounds⁹⁸. The white Irish ethnic group includes the highest proportion of residents with no qualifications⁹⁹. Chapter 6 deals primarily with the provision of workspaces, and many of these barriers are outside the scope of the Plan but are addressed in other Mayoral strategies, in particular the Economic Development Strategy.
- 7.5.3 Policy E2 seeks to support the provision and protection of low-cost business space and Policy E3 covers affordable workspace including (Part A3) the allowance that in defined circumstances planning obligations may be used to secure affordable workspace specifically for disadvantaged groups

⁹⁶ *ibid*

⁹⁷ Long et al (2009) *Systematic Review* of the Literature on Black and Minority Ethnic Communities in sport and physical recreation

⁹⁸ ONS, Census 2011

⁹⁹ This is mainly to do with the group's unique migration history and age profile.

setting up in any sector. Policy E8 complements policy E3, encouraging business support that is tailored to provide opportunities for people from BAME backgrounds.

- 7.5.4 Policies E4 to E7 seek to retain sufficient industrial capacity within London. There are significant disparities in rates of low pay between BAME and white workers in specific sectors, with BAME workers more likely to experience low pay in the wholesale and retail sector and the primary utilities and manufacturing sector¹⁰⁰. Apart from most retail premises, these sectors are often accommodated in industrial locations. While the retention of industrial capacity would be unlikely to directly address pay disparities, these policies may have a positive impact through helping to ensure that businesses that employ low paid BAME workers can continue to operate within London. However, Policy E7 in some circumstances allows the loss of non-designated industrial sites to other uses and encourages industrial intensification that could result in the displacement of industrial businesses. This may have a negative impact on the low paid workers in these sectors, who would be more likely to be from BAME backgrounds.
- 7.5.5 Policy E9 requires development plans and development proposals to support the range of specialist shopping, provision of a diverse mix of uses and contribute to local identity and vitality of town centres. This may indirectly benefit BAME communities where these facilities support the shopping and leisure needs of a specific ethnic group or where there are small BAME owned shops and services.
- 7.5.6 The policy also places restrictions on the development of new (A5) hot takeaway food uses close to schools as a public health measure to address childhood obesity. Obesity is more common among certain ethnic groups in London, including those from Black and Asian children, specifically Pakistani, and Bangladeshi children¹⁰¹. The Policy requirements of E9 with regard to hot food takeaways therefor may have a positive impact for certain groups that share this protected characteristic.

7.6 Chapter 7: Heritage & Culture

- 7.6.1 Working alongside D1, Policy HC1 requires boroughs to develop an understanding of the value of the historic environment, recognising that local communities provide a valuable source of information in understanding the value of the historic environment and how it contributes to the character and identity of a place. The policies explicitly recognise the influence

¹⁰⁰ Current Issues Note 36: Patterns of low pay, GLA Economics, July 2012

¹⁰¹ Public Health England (2015), Childhood Obesity Applying all of our Health

of past human cultural activity from all sections of London's diverse community. This will be particularly relevant for BAME Londoners, and Gypsies and Travellers, and could represent positive impacts by ensuring that the cultural heritage of specific groups is recognised and protected.

- 7.6.2 Policy HC5 also encourages boroughs to develop an understanding of the existing cultural offer in their areas and consider how it serves different groups of people, including different racial groups.
- 7.6.3 The overall promotion of a more diverse evening and night time economy may benefit BAME Londoners in terms of broadening the appeal of the night-time economy to a wider range of people. However, the incidents of hate crime based on race are higher than other protected characteristic groups¹⁰² and this could be a barrier to broadening the appeal of the night-time economy. Policy HC6 requires boroughs to work with landowners, businesses and the police to reduce these barriers to the night-time economy such as improving safety and security in town centres and public realm. The availability of safe and convenient public transport near night-time economy venues is also likely to positively benefit people who share this protected characteristic, and HC6 aims to ensure that venues are well-served in this regard.
- 7.6.4 Policy HC6 also recognises that there are potential negative impacts of the promotion of the night time economy on residents and seeks to mitigate against those. This is also supported by the requirements of Policy D12. This is particularly important as the Plan encourages mixed use development (including housing) in town centres, which is also where development of the night time economy is being promoted.

7.7 **Chapter 8: Green Infrastructure**

- 7.7.1 Fewer children in London regularly visit a park or green space than elsewhere in England while at the national level, on average, children from BAME households were less likely to frequently visit the natural environment¹⁰³. Policies within the Plan, including G2 and G4, help to protect and enhance green and open spaces within London. Policy G4 sets the framework for the identification and protection of open spaces and securing of new open space, including addressing areas of deficiency. The extent of the positive impacts will depend on local circumstances (through the Local Plan process or local planning decisions), however improving the access to green

¹⁰² EHRC 2016 Research report 102 Causes and motivations of hate crime

¹⁰³ Natural England, Monitor of Engagement with the Natural Environment: a pilot to develop an indicator of visits to the natural environment by children, 2016

space can have a positive impact within local areas, particularly in areas of deficiency, potentially increasing opportunities for people to visit, experience and enjoy these areas, which could represent a positive impact for children from BAME households.

- 7.7.2 Evidence on air quality suggests that places with higher proportions of some BAME groups can be more likely to be exposed to above EU-limit Nitrogen Dioxide (NO₂)¹⁰⁴. Green features can intercept pollutants in the air and reduce exposure to poor air quality. Through protecting and enhancing London's green features the Plan's green infrastructure policies, alongside other policies such as T2 (Healthy Streets) can be beneficial in helping to mitigate some of the impacts of poor air quality alongside other policies such as SI1.

7.8 Chapter 9: Sustainable Infrastructure

- 7.8.1 Evidence on air quality suggests that places with higher proportions of some BAME groups can be more likely to be exposed to above EU-limit Nitrogen Dioxide (NO₂)¹⁰⁵. Policy SI1 seeks to ensure that developments do not cause new breaches of legal limits of air pollution or undermine other efforts to achieve them, as well as ensuring developments meet standards (for example Air Quality Neutral and Air Quality Positive) that seek to reduce total pollutant emissions. Policy SI1 alongside other policies (e.g. D1 and D2) supports reducing exposure to poor air quality through good design, with a particular focus on preventing or minimising exposure in Air Quality Focus Areas (those areas with particularly high exposure) and in locations likely to be used by large number of people who would be particularly vulnerable to poor air quality. Alongside these measures there are wider policies in the Plan aimed at improving air quality and reducing emissions for example transport policies T1-T7, which aim to do this through reducing reliance on private cars and making journeys through lower emissions means. Policy SI1 and other policies in the plan are therefore likely to have positive outcomes in helping to tackle poor air quality. The extent of benefits will be dependent on a number of factors, however, they can help to positively impact on BAME groups, including in relation to exposure, alongside other measures. These policy requirements are designed to work in conjunction with wider initiatives to tackle air quality identified in the Mayor's Transport Strategy and London Environment Strategy.
- 7.8.2 10 per cent of households in London are fuel poor and national evidence demonstrates that there is a greater proportion of

¹⁰⁴ Updated Analysis of Air Pollution in London, Aether, February 2017

¹⁰⁵ Updated Analysis of Air Pollution in London, Aether, February 2017

BAME households in fuel poverty¹⁰⁶. Policies in the plan such as SI2 aim to provide better insulated, more energy efficient homes, which can help to lower costs for heating. These policies also encourage developments to maximise opportunities for on-site electricity and heat production from solar technologies, which will help to reduce energy costs to occupants. Such policies therefore likely to have a positive impact on BAME households, who are more likely to be fuel poor.

7.9 Chapter 10: Transport

- 7.9.1 Differences are observed in the travel choices and barriers to travel that the BAME population face in London. The overarching principle of the transport Chapter is to increase the share of travel undertaken by sustainable means (see Policy T1 A). Policies T2 and T3 (including Table 10.1) contain specific measures to enhance bus capacity, connectivity and reliability, with other policies contributing more generally to greater efficiency of the bus network. This is likely to be beneficial for BAME people given higher usage of London's buses amongst this protected characteristic (68 per cent of BAME Londoners use the bus at least once a week compared to 57 per cent of white Londoners¹⁰⁷).
- 7.9.2 The transport policies of the Plan aim to help Londoners use cars less, reducing road congestion and its associated negative consequences such as air and noise pollution. This will be achieved through policies including T1, T2 (which seek to rebalance the transport system towards walking, cycling and public transport) and T6 (which restricts car parking where appropriate). As identified above, evidence on air quality suggests that places with higher proportions of some BAME groups can be more likely to be exposed to above EU-limit Nitrogen Dioxide (NO₂)¹⁰⁸. Reducing pollutant emissions from road transport by shifting to more sustainable modes will therefore have a positive impact for some BAME groups.
- 7.9.3 Policy T5, supported by the Healthy Streets Approach, encourages greater levels of cycling through the delivery of supporting infrastructure such as cycle parking and a London-wide network of cycle routes. Given that only 25 per cent of people who cycle at least once a year are BAME/mixed-race (despite making up 37 per cent of London's population), this policy may disproportionately benefit white Londoners, but could still contribute to increasing the levels of cycling in BAME

¹⁰⁶ www.gov.uk/government/collections/fuel-poverty-statistics

¹⁰⁷ Transport for London (2015) *Travel in London: Understanding our Diverse Communities*, pg. 36.

¹⁰⁸ Aether (2017) *Updated Analysis of Air Pollution in London*.

groups in absolute terms. The Cycling Action Plan recognises that barriers to cycling may be experienced differently by BAME Londoners and aims to create an inclusive environment for cycling to help tackle these barriers.

- 7.9.4 The affordability of transport is likely to be a more significant issue for BAME Londoners due to a lower employment rate (57 per cent, compared to 64 per cent¹⁰⁹) and lower incomes. While it is not the scope of the London Plan to set public transport fares, the Mayor's Transport Strategy contains measures to ensure that the public transport enhancements secured by the London Plan are affordable.
- 7.9.5 Policy T2 seeks to create healthy street environments that are attractive and encourage walking, cycling and public transport use. One element of this is planning land use and designing streets in such a way that reduces road danger. BAME Londoners are less likely to say they feel safe from road incidents when walking around London¹¹⁰.
- 7.9.6 The proportion of BAME Londoners who have felt worried about their personal security within the three months prior to a 2014 survey was 20 per cent; this is compared to 14 per cent for white Londoners¹¹¹. Working alongside Design policies D1, D3, D7 and D10, Policy T2 aims to create places that feel safe and could therefore contribute to reducing fear of crime, benefitting BAME Londoners as highlighted by the 2014 TfL report.
- 7.9.7 The transport policies support the delivery of improvements to public transport connectivity and capacity. Improvements to transport connectivity can give people greater access to employment opportunities and while the relationship between transport and employment is complex, under the right conditions, investment in transport connectivity can contribute to reducing unemployment¹¹². Given that BAME Londoners are less likely to be in employment¹¹³, improvements to transport connectivity could contribute to improving this inequality, representing a potential positive impact for BAME Londoners.
- 7.9.8 Transport improvements, such as some of those listed in Table 10.1 (which provides an indicative list of transport scheme proposals, and timetables for these works) will often impact on the value of land surrounding the scheme¹¹⁴. Depending on local circumstances, this could inflate the cost of accommodation in some areas, particularly impacting private

¹⁰⁹ Transport for London (2015) *Travel in London: Understanding our Diverse Communities*, pg. 22.

¹¹⁰ *Ibid*, pg. 52.

¹¹¹ Transport for London (2014) *Attitudes to Safety and Security – Annual Report*.

¹¹² Department for Transport (2014) *Transport investment and economic performance: Implications for project appraisal*.

¹¹³ Transport for London (2015) *Travel in London: Understanding our Diverse Communities*, pg. 22.

¹¹⁴ Transport for London (2017) *Land Value Capture*.

renters on low incomes. BAME Londoners are more likely to live in households with an average annual income below £20,000 (43 per cent BAME, compared with 32 per cent White) and are twice as likely to rent privately than White British people¹¹⁵, making them more likely to experience this potential displacement effect. The housing policies in the London Plan seek to increase the housing supply, including affordable housing, which should act to reduce such pressures and help to mitigate the potential negative impact on these groups.

¹¹⁵ Office of National Statistics – 2011 Census

8 Religion or belief

8.1 Chapter 2: Spatial development pattern

8.1.1 Policy SD4 seeks to support the strategic functions of the Central Activities Zone, and specifically recognises places of worship and places of assembly of regional, national and international importance as being strategic functions of the CAZ. Policy SD6 seeks to enhance social infrastructure within town centres, which could include places of worship. These policies may therefore have positive effects for people who share this protected characteristic.

8.2 Chapter 3: Design

8.2.1 Policies D1 and D2 seek to ensure that what is valued in a place is identified and strengthened in the future development of the area, this could include religious venues such as places of worship. By identifying and understanding the how places and buildings are valued by particular groups with religious or other beliefs and the wider community, plans for the future development of an area can recognise their importance and utilise them in placemaking, which could have a positive impact for these groups.

8.2.2 The Equality and Human Rights Commission’s research highlights the stigma and discrimination many groups face on the basis of their race and religion across England¹¹⁶. Policies D1, D3 and D7 require that the design of places, and the management of the public realm, creates safe, welcoming, secure and inclusive places and spaces. Thus, these policies should positively impact on religious or belief groups by creating places they can feel comfortable and safe being in, which can assist in breaking down the barriers created by and negative experiences resulting from the evidenced stigma and discrimination¹¹⁷.

8.2.3 Policy D10 also assists in this by setting out requirements to maintain a safe and secure environment and reduce the fear of crime. Creating safe secure places will impact positively on members of religious groups given that they are more likely to be a victim of hate crime and feel unsafe at home and/or in their local area than non-religious people¹¹⁸.

8.2.4 D12 requires that the Agent of Change principle is applied to new development. This will mean existing places of worship

116 EHRC (2016) ‘Is England Fair: The State of Equality and Human Rights 2016

117 *ibid*

118 *Ibid*

will not be responsible for mitigating the impacts of the noise it generates if new noise sensitive development such as housing is built next to it. This policy will positively impact on certain religious groups by protecting the continued operation of existing places of worship.

8.3 Chapter 4: Housing

- 8.3.1 Those from some religious groups in London such as- Sikhs, Hindus and particularly Muslims - experience overcrowding at above-average rates¹¹⁹ and therefore may benefit from policies that promote the delivery of a range of unit sizes (H12) and specifically the size of low cost rented units required to meet identified needs (H12 C). Also, the delivery of a range of sized homes, including one and two bed homes, can have a positive impact, insofar as that they can provide the opportunity for new households to form, potentially releasing larger homes currently occupied by sharers.
- 8.3.2 Those with some religious beliefs – Muslims and Christians- are more likely to live in social housing¹²⁰ and are therefore more likely to experience potential negative impacts arising from temporary or permanent relocation caused by redevelopment of existing social housing estates. While not promoted by the London Plan as a source of housing supply, Policy H10 sets out the approach to the demolition and re-provision of housing, including estate regeneration. Redevelopment of housing estates, where it involves demolition, will require existing tenants to relocate for a period of time, which can be disruptive and impact negatively on residents’ ability to access community and support networks. Measures to mitigate potential negative impacts have been developed through the Mayor’s other powers, including through the Mayor’s London Housing strategy (see Policy 5.3 E) and “Better Homes for People, the Mayor’s Good Practice guide to Estate Regeneration”, which applies to all estate regeneration schemes seeking Mayoral funding. The Good Practice guide is clear that “when considering the option of demolishing and rebuilding homes, boroughs, housing associations and their partners should always consider alternative options to demolition first”¹²¹. The Plan itself references the Good Practice guide and Policy H10 stipulates that affordable housing floorspace should be replaced on an identical basis where tenants have the right to return, or equivalent basis where they do not. This ensures that existing tenants are able to return and that the new development continues to provide equivalent affordable housing provision for

¹¹⁹ Office for National Statistics. 2011 Census.

¹²⁰ Office for National Statistics. 2011 Census.

¹²¹ Mayor of London, Better Homes for People, the Mayor’s Good Practice Guide to Estate Regeneration” Page 8

new tenants. Moreover, existing and new tenants are likely to benefit from better quality development that meets all of the other requirements of the Plan (including access, space and safety standards) and where an uplift is provided will increase the stock of genuinely affordable housing, which will be of benefit to those in need of affordable housing.

8.4 Chapter 5: Social infrastructure

- 8.4.1 S1 protects existing social infrastructure where it is needed and supports the delivery of new facilities that are accessible and inclusive and are well connected by public transport. This will benefit religious or belief groups, ensuring places of worship can be accessed by a wide range of people. However, many faith groups often face difficulties finding suitable premises to meet their needs as they are often competing with other higher value uses that result in them trying to secure sub-standard venues in inappropriate locations that are often not well connected by public transport¹²².
- 8.4.2 The co-location of services could positively impact on faith groups who experience difficulties in finding suitable premises in terms of cost and size of venue to meet their needs. However, for some religious or belief groups co-location with other services is not possible due to their beliefs or specific requirements.
- 8.4.3 Some groups such as Muslim women¹²³ face particular barriers in relation to feeling comfortable in accessing sport and recreation facilities, these include changing and showering in communal facilities, a lack of women-only sessions, dress codes and costs¹²⁴. Applying policy D3 inclusive design to these facilities can help address these issues and promote greater participation in sports and recreation activities for these groups.
- 8.4.4 Policy S7 seeks to ensure boroughs make provision for different burial needs. The policy recognises that the demand for burial space for particular religious or belief groups is not always well matched with the availability of burial space, with some boroughs having little or no burial space availability¹²⁵. The policy encourages boroughs to work collaboratively to identify space, particularly in areas with a shortage of space, trying to apply a proximity principle where possible, which seeks to locate supply of burial space near to areas of demand for that space. This is likely to have a positive impact for religious or

¹²² CAG Consultants et al (2008), Responding to the needs of faith communities: places of worship

¹²³ Sport England, 2013, Active People Survey analysis tool,

¹²⁴ Muslim Women in Sport, Women's Sport and Fitness Foundation and Sporting Equals, 2010

¹²⁵ Cemetery Research Group for GLA, 2010, Audit of London Burial Provision

belief groups for whom burial is the only option. However, as the policy leaves the identification of sites for boroughs, and due to local competing land use requirement, this may mean that even with the proximity principle, some religious or belief groups for whom burial is the only option may be negatively affected as they may have to travel some distance to reach burial sites.

8.5 Chapter 6: Economy

- 8.5.1 Policy E5 is clear that applications for places of worship in Strategic Industrial Locations should be refused. This could have a negative impact on some religious or belief groups, restricting the availability of sites for places of worship. However, this effect is mitigated by other policies in the Plan, particularly Policy S1, which seeks to ensure that boroughs undertake needs assessments for social infrastructure to meet the needs of London's diverse communities. The Glossary is clear that places of worship fall within the definition of social infrastructure.
- 8.5.2 Policy E9 requires development plans and development proposals to support the range of specialist shopping, provision of a diverse mix of uses and contribute to local identity and the vitality of town centres. This may indirectly benefit religious groups where these facilities support the shopping and leisure needs of a specific religious group.

8.6 Chapter 7: Heritage & Culture

- 8.6.1 Working alongside D1, Policy HC1 requires boroughs to develop an understanding of the value of the historic environment, recognising that local communities provide a valuable source of information in understanding as to the value of the historic environment and how it contributes to the character and identity of a place. The policies explicitly recognise the influence of past human cultural activity from all sections of London's diverse community. This may have a positive impact on some specific religious or belief groups by ensuring that their cultural heritage is recognised and protected. HC5 encourages boroughs to develop an understanding of the existing cultural offer in their areas and consider how it serves different groups of people. The promotion of certain cultural activities is likely to be beneficial for these groups.
- 8.6.2 The overall promotion of a more diverse evening and night time economy may benefit people of different faiths or beliefs in

terms of broadening the appeal of the night-time economy to a wider range of people. However, people who share this protected characteristic may be more at risk of hate crime or fear of crime¹²⁶ and this could be a barrier to broadening its appeal. Policy HC6 requires boroughs to work with landowners, businesses and the police to reduce these barriers such as improving safety and security in town centres and areas of public realm. The availability of safe and convenient public transport near night-time economy venues is also likely to positively benefit people who share this protected characteristic, and HC6 aims to ensure that venues are well-served in this regard.

- 8.6.3 HC6 also recognises that there are potential negative impacts of the promotion of the night time economy on residents and nearby uses and seeks to mitigate against those – this is also supported by the requirements of Policy D12. This particularly important as the Plan encourages mixed use development, including housing in town centres, which is also where development of the night time economy is being promoted.

8.7 Chapter 8: Green Infrastructure

- 8.7.1 In England, the proportion of religious groups that reported being a victim of violent crime was higher (9.1%) than those of no religion¹²⁷. Alongside Policy D3 and D7, policies such as G1, G3 and G4¹²⁸ can help to make open spaces more inclusive in their design. A key element of inclusive design is that spaces can be used safely and are welcoming– this is important given that given that violent crime may be a particular a concern for this group. The extent of the positive impacts will depend on local circumstances (through the Local Plan process or local planning decisions) however certain green infrastructure policies, alongside other policies in the Plan, have the potential to make a positive impact for some people who share the protected characteristic of religion or belief.

¹²⁶ EHRC (2016) 'Is England Fair: The State of Equality and Human Rights 2016

¹²⁷ EHRC 2015 'Is Britain Fairer?': Key facts and findings on religion or belief

¹²⁸. The supporting text for policy G3 encourages proposals to enhance access to MOL, addressing poorer quality areas for example by through inclusive design. The supporting text of policy G4 encourages inclusive design in relation to other types of local protected open spaces.

8.8 **Chapter 9: Sustainable Infrastructure**

- 8.8.1 No specific key positive or negative impacts of this chapter have been identified for this protected characteristic.

8.9 **Chapter 10: Transport**

- 8.9.1 There are unlikely to be specific key positive or negative impacts of the transport policies in the Plan on people who share the protected characteristic of religion or belief. Policies T1 and T3 seek to improve the capacity and connectivity of the public transport and active travel networks. Working alongside Policy S1 E that requires new social infrastructure to be easily accessible by walking, cycling and public transport – these transport policies should have a beneficial impact for faith groups by making it more convenient to travel to places of worship.

8.9.2

- 8.9.3 Policy T2 Healthy Streets works along design policies D1, D3 and D7 to seek to create streets and areas of public realm that feel safe and inclusive. Research has highlighted the discrimination many groups face due to their religion¹²⁹. Designing spaces that feel welcoming and safe should have a positive impact for people by contributing to feelings of comfort whilst using London's streets. This may help to overcome some of the negative experiences resulting from discrimination and reducing the fear of crime or harassment.

129 EHRC (2016) 'Is England Fair: The State of Equality and Human Rights 2016

9 Sex

9.1 Chapter 2: Spatial development pattern

9.1.1 Policy SD6 requires safety and security to be improved in town centres and requires active street frontages and appropriate street lighting to be secured in new development. Women and men report different perceptions and experiences of crime and safety¹³⁰. Women are more likely to experience concerns around safety and take precautions against crime when travelling¹³¹ and are more likely to experience this in both the daytime and night-time, whereas men are more typically concerned when travelling at night¹³². Together with Policies D3 D7 and D10, Policy SD6 should ensure that town centre environments to which these policy requirements apply are welcoming and safe, representing positive impacts for both women and men to differing extents depending on the time of day.

9.2 Chapter 3: Design

9.2.1 Many of the policies within chapter 3 are likely to have positive impacts for women. Places that make people feel safe are particularly important for women. So, for many women- the creation of environments that are welcoming and accommodating is particularly important.

9.2.2 Policies D1, D2 and D7 seek to ensure safe and secure and inclusive environments are achieved with an emphasis on the user experience of these environments, mainstreaming and integrating measures to design out crime into development proposals at the earliest possible stage in the design process. In particular, D1 requires encourages opportunities to be taken to reduce anti-social behaviour and, criminal activities to ensure a sense of safety achieved without being overbearing or intimidating. Good natural surveillance, clear sight lines, appropriate lighting, logical and well-used routes and a lack of potential hiding places are all highlighted as fundamental to this approach. D7 goes onto seek to ensure places are designed to be inclusive, comfortable and inviting.

9.2.3 Policy D3 requires all developments to be convenient and welcoming and meet the highest standards of inclusive design. All of which will contribute to users experiencing a safe

¹³⁰ Transport for London (2013) Attitudes to Safety and Security – Annual Report

¹³¹ Ibid.

¹³² Ibid.

and secure environment they can feel confident experiencing, which could have a particular positive impact for women.

- 9.2.4 Women in London have a longer life expectancy than men¹³³, but can expect to live a greater proportion of their life in ill-health. They are therefore proportionately more likely to benefit from the requirements of D3 Inclusive design in terms of developments achieving the highest standards of accessible and inclusive design and the resultant barrier free environment.
- 9.2.5 Policy D10 sets out requirements to maintain a safe and secure environment and reduce the fear of crime, which should result in a positive impact for women.
- 9.2.6 Many of the design policies emphasise the importance of developments being well connected via the provision of pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, take account of desire lines. This will not only assist in creating places and spaces that people feel confident and safe using but will also encourage active travel.

9.3 Chapter 4: Housing

- 9.3.1 Women are more likely to be economically inactive¹³⁴, low paid¹³⁵, and/ or subject to the poverty that affects single parent families¹³⁶. Thus, women may benefit from efforts to increase the supply of homes and particularly of genuinely affordable homes.
- 9.3.2 However, the level and tenure of affordable housing that can be delivered is constrained by viability and the availability and conditions of funding, thus while providing a potential positive impact on those in need of affordable housing, the impact of Policies (H5-7) will be constrained as they will not meet all identified need.
- 9.3.3 The proportion of single parent households in social rented housing in London is about double that of the whole population¹³⁷. This indicates a greater representation of women, who head the majority of single parent households, in the sector. While not promoted by the London Plan as a source of housing supply, Policy H10 sets out the approach to the demolition and re-provision of housing, including on affordable

¹³³ ONS (2017) Health state life expectancies, UK: 2014 to 2016

¹³⁴ New Policy Institute. London's Poverty Profile 2015

¹³⁵ 58 per cent of low paid jobs in London are carried out by women. Moreover, the biggest group among the low paid in London is female part-time employees, who account for 31 per cent of all low paid Londoners. Ibid.

¹³⁶ 53 per cent of all London's single parent families live in poverty, and 97 per cent of those parents are female. Ibid.

¹³⁷ Office for National Statistics. 2011 Census.

housing estates. Redevelopment of housing estates, where it involves demolition, will require existing tenants to relocate for a period of time, which can be disruptive and can impact on people’s ability to access their community and support networks. Measures to mitigate potential negative impacts have been developed through the Mayor’s other powers, including through the Mayor’s London Housing strategy (see Policy 5.3 E) and “Better Homes for People, the Mayor’s Good Practice Guide to Estate Regeneration” that applies to all estate regeneration schemes seeking Mayoral funding. The Good Practice guide is clear that “when considering the option of demolishing and rebuilding homes, boroughs, housing associations and their partners should always consider alternative options to demolition first”¹³⁸ The Plan itself references the Good Practice guide and Policy H10 stipulates that affordable housing floor-space should be replaced on an identical basis where tenants have the right to return, or equivalent basis where they do not. This ensures that existing tenants are able to return and that the new development continues to provide equivalent affordable housing provision for new tenants. Moreover, existing and new tenants are likely to benefit from better quality development that meets all of the other requirements of the Plan (including access, space and safety standards) and where an uplift is provided will increase the stock of genuinely affordable housing, which will be of benefit to those in need of affordable housing, which includes single parent families¹³⁹.

- 9.3.4 Women who are single parents or victims of domestic abuse experience homelessness at a disproportionate rate, and thus may benefit from an increased supply of genuinely affordable housing (H5 and H6). Policy H14 also seeks to ensure that the need for specialist and supported housing is addressed, specifically referencing accommodation for victims of domestic abuse and accommodation for victims of violence against women and girls.
- 9.3.5 Men are more likely than women to be homeless and to be sleeping rough and may benefit from supported and specialised accommodation and increases in affordable housing more generally. Policy H14 specifically references accommodation for rough sleepers, and to provide temporary housing on meanwhile sites (H4). Indirectly, policies to increase housing overall (H1) and affordable housing in particular (H5) could also have a positive impact although it is recognised that homelessness and rough sleeping are complex issues where housing affordability is an important component but not the only factor.

¹³⁸ Mayor of London, “Better Homes for People, the Mayor’s Good Practice Guide to Estate Regeneration” Page 8

¹³⁹ The London SHMA 2017 shows that the majority of loan parent families can only afford low cost rented accommodation – see table 8 page 88-89 .

9.4 Chapter 5: Social infrastructure

- 9.4.1 S1 protects existing social infrastructure where needed and supports the delivery of new facilities to support growth that are accessible and inclusive. The co-location of services and their accessibility by via public transport or walking, cycling (SD6-SD9 and T2) is likely to particularly benefit women as women are more likely to make multi-stops and encumbered journeys than men¹⁴⁰.
- 9.4.2 Life expectancy is increasing for both women and men, although the gap is narrowing, women still live longer¹⁴¹. However, when looking at healthy life expectancy there are significant variations both between men and women and across London. For women the period they live in poor health for can range from 15 years in Kingston to 27 years in Tower Hamlets, which means that some women in London are living as much as a third of their lives in poor health. S2 requires boroughs to work with CCGs and other NHS and community organisations to understand local health and social care needs and plan for them accordingly, taking into account the implications of service transformation plans and new models of care set out in NHS Forward Planning documents. S2 also works in tandem with other policies within the Plan through preventative measures to help tackle health inequalities that cannot be solely addressed through the health care provision.
- 9.4.3 S4 set out a framework for the delivery of education and childcare facilities to meet demand. A lack of access to adequate and affordable childcare can provide significant challenges to employment, particularly for women. This can translate into underemployment, women feeling forced to restrict themselves to part-time work or to move into low-skilled, less senior and lower paid roles for which they are often over-qualified, with reduced opportunities for career progression.¹⁴² The requirements of S4 could therefore result in positive impacts experienced more by women

9.5 Chapter 6: Economy

- 9.5.1 There are a range of disparities between men and women in relation to employment, with women more likely to work part time, earn below the London Living Wage, and more likely to be unemployed. Women employed full-time have a lower average hourly rate than men, though the converse is true for part-time

¹⁴⁰ Transport for London, 2015. Travel in London: Understanding our diverse communities.

¹⁴¹ Public Health England, Public Health Outcomes Framework; (2014-16)

¹⁴² EHRC 2016, 'Is England Fair: The State of Equality and Human Rights 2016

employment.¹⁴³ Many of these issues are outside of the scope of the Plan, however the Mayor’s Economic Development Strategy seeks to address issues around low pay and economic fairness through a range of other programmes.

- 9.5.2 There is a lack of support for transitions from education to work, especially for young women. Policy E3 encourages affordable workspace including (Part A3) the allowance that in defined circumstances planning obligations may be used to secure affordable workspace specifically for disadvantaged groups setting up in any sector. Policy E8 complements Policy E3, encouraging business support that is tailored to provide opportunities for women.
- 9.5.3 Policies E4 to E7 seek to retain sufficient industrial capacity within London. The proportion of men working in skilled trades occupations or working as process, plant and machine operatives is significantly higher than the proportion of women in these roles¹⁴⁴. These roles are more likely to be located in industrial locations, and therefore these policies may have a greater beneficial effect for men than women.
- 9.5.4 Policy E5 C6 identifies the potential for small-scale ‘walk to’ services for industrial occupiers such as workplace crèches to be located in Strategic Industrial Locations. This may benefit women in particular, given that women with dependent children in London are less likely to be in employment than their counterparts in the rest of the country¹⁴⁵.

9.6 Chapter 7: Heritage & Culture

- 9.6.1 This chapter highlights the importance of London’s heritage and culture in shaping its character, recognising the value heritage and culture to London’s diverse communities.
- 9.6.2 Culture can help to promote social integration by bringing different communities together. HC5 encourages boroughs to develop an understanding of the existing cultural offer in their areas and consider how it serves different groups of people.
- 9.6.3 HC6 requires boroughs to develop a vision for the night-time economy and to promote it in appropriate places. A key element of the policy is to encourage a greater diversity of activities and uses broaden the appeal of the night-time economy to a wider range of people. However, some people may face certain barriers in feeling comfortable going out at night. TfL research¹⁴⁶ cites that women are more likely to have concerns

¹⁴³ GLA Economics (2016) Economic Evidence Base 2016

¹⁴⁴ GLA Economics (2016) Economic Evidence Base 2016

¹⁴⁵ GLA Economics (2016) Economic Evidence Base 2016

¹⁴⁶ Transport for London 2015. Travel in London: Understanding our diverse communities

about their personal security when using public transport in London (19 per cent of women compared with 14 per cent of men), but men are slightly more likely to experience crime using public transport at night than women. HC6 aims to mitigate these potential negative impacts by promoting an integrated approach to management of the night-time economy, particularly in relation to planning, licensing, safety and security. Working in with policy SD6, the Plan explicitly requires boroughs to set out strategies to improve access, inclusion and safety, and to ensure that night-time economy venues are well-served with safe and convenient transport. These measures should help improve perceptions of safety for women in general, and for men using public transport at night.

9.7 **Chapter 8: Green Infrastructure**

9.7.1 Ensuring places feel safe is particularly important for women. Alongside Policy D3 and D7, policies such as G3 and G4 can help to make open spaces more inclusive in their design. A key element of inclusive design is that spaces can be used safely and are welcoming. The extent of the positive impacts will depend on local circumstances (through the Local Plan process or local planning decisions).

9.8 **Chapter 9: Sustainable Infrastructure**

9.8.1 For policies in this chapter, no specific key positive or negative impacts have been identified for this protected characteristic.

9.9 **Chapter 10: Transport**

9.9.1 There are evidenced differences in travel behaviour between women and men, therefore, the transport policies of the Plan may impact on women and men differently.

9.9.2 Women are more likely than men to use some modes of public transport and less likely to use others. Women are also slightly more likely to report that at least one or more barrier to travel prevents them from increasing their use of public transport (84% of women, compared to 81% of men¹⁴⁷).

¹⁴⁷ Ibid

- 9.9.3 Policy T3, amongst others, aims to deliver increases in public transport capacity and reduce crowding levels as the population grows in line with Plan forecasts. Given that women report overcrowding as a factor that puts them off using public transport more than men do (¹⁴⁸, this could encourage greater public transport use by women, and potentially contribute to addressing the gendered differences in Tube patronage¹⁴⁹.
- 9.9.4 The Plan contains policies aimed at improving the capacity, connectivity and reliability of the bus network, particularly through the schemes listed in Table 10.1 and Policy T3 E, but also through policies that support the creation of street environments that enable buses to operate more efficiently such as policies T2 Healthy Streets and T6 Car Parking. This is likely to have a positive impact specifically for women given their higher bus patronage: 65% of women use the bus at least once a week compared to 58% of men¹⁵⁰.
- 9.9.5 Policy T5 supports the delivery of a London-wide network of cycle routes to facilitate convenient and safe cycling, with other policies (such as T2) promoting traffic reductions that complement this objective. These measures can contribute to increased levels of cycling more generally, but potentially also for women in particular. Currently, women are underrepresented as regular cyclists (10% of women cycle at least once a week compared to 17% of men¹⁵¹) and research has shown that women cycling in London are more likely than men to prefer safer routes away from motor traffic¹⁵². The Cycling Action Plan recognises women’s different experience of cycling in London and aims to create an inclusive environment for cycling, removing barriers to participation.
- 9.9.6 While women and men generally cite similar barriers to using public transport, there are some particular differences with the two groups perceptions and experiences of crime and safety¹⁵³. Women are more likely to experience worry and take precautions against crime when travelling¹⁵⁴ and are more likely to experience worry in both the daytime and night-time, whereas men typically worry more when travelling at night¹⁵⁵. The Mayor’s Transport Strategy contains the principal measures through which security and crime on the transport network will be addressed. However, in addition to this, the Plan also contains policies that work to create well-designed places and street environments that feel safe and could potentially contribute to reducing the fear of crime that women are more

¹⁴⁸ Ibid.

¹⁴⁹ Ibid

¹⁵⁰ Ibid

¹⁵¹ Transport for London (2016) Attitudes to Cycling, pg. 32.

¹⁵² Cycle route choice research, SDG for TfL, June 2012

¹⁵³ Transport for London (2013) Attitudes to Safety and Security – Annual Report

¹⁵⁴ Ibid.

¹⁵⁵ Ibid.

likely to experience. Development proposals are required to demonstrate the application of the Healthy Streets Approach to improve street safety and ensure the public realm feels safe (D7 A), with careful consideration given to lighting (paragraph 3.7.10), and creating an inclusive and welcoming environment, again representing potential positive impacts for women specifically.

- 9.9.7 Women are slightly more likely to be disabled than men¹⁵⁶. Women are also more likely to be travelling with push chairs or prams and due to this can face particular problems with transport accessibility, and the design of the street environment. The policy requirements of the London Plan aim to address these particular impacts, promoting an inclusive design approach and the creating of a barrier free environment.

¹⁵⁶ Transport for London (2015) Travel in London: Understanding our Diverse Communities

10 Sexual Orientation

10.1 Chapter 2: Spatial development pattern

- 10.1.1 The approach set out in SD1 to Opportunity Areas is likely to lead to significant development within these areas, leading to pressure for redevelopment of sites containing established businesses, potentially including venues that serve LGB customers. This could be mitigated through the requirements of parts A5 and B3 of the policy, which seek to create mixed and inclusive communities in Opportunity Areas, as well as other policies, primarily D12 that seeks to protect the operation of established businesses and HC5-7 that seek to resist the loss of cultural venues and pubs that serve the LGBT+ community. In conjunction with these other policies, SD1 is therefore considered to have a neutral effect on LGB people.
- 10.1.2 Policy SD4 seeks to promote and enhance the strategic functions of the CAZ, including arts, culture, leisure, and entertainment that is of regional, national and international importance. While the Plan does not explicitly mention them, this could include the cluster of LGBT+ venues centred on Soho, contributing to a positive effect on LGB people.
- 10.1.3 Policies SD6 to SD9 seek to support the vitality and viability of London's town centres, maintaining a network of town centres across London, and generally supporting a 'town centre-first' approach to relevant development. This policy framework should contribute to supporting LGBT+ venues, as well as providing sustainable access to the social infrastructure, employment opportunities and day-to-day needs and activities that LGB people require. Town centres and high streets also provide important places for social exchanges, which may assist in addressing social isolation for LGB people.
- 10.1.4 Policy SD6 J seeks to improve safety and security in town centres, which may help to address safety concerns for LGB people, who are more likely to face harassment in the public realm¹⁵⁷.
- 10.1.5 Policy SD10 requires boroughs to develop policies that are based on a thorough understanding of the demographics of communities and their needs and to tackle spatial inequalities and barriers that affect the lives of people in the area. While the policy does not explicitly mention LGB people, this policy may

¹⁵⁷ EHRC 2016, 'Is England Fair: The State of Equality and Human Rights 2016

help to create an environment in which regeneration contributes to improving the lives of LGB Londoners.

10.2 Chapter 3: Design

- 10.2.1 Policies D1 and D2 seek to ensure what is valued in a place is identified and strengthened in the future development of the area, this could include LGB identity, although this is not explicitly stated. Policy D2 also requires the demographic make-up of an area (this can include information on sexual orientation where it is available) to be incorporated into a borough's understanding of the areas character and to be used to inform its development plans. This will help ensure information on the local the LGB population is identified and used to inform the for future development of the area.
- 10.2.2 Policies D1, D3 and D7 requires that the design of places, and the management of the public realm, creates safe, secure and inclusive places. Policy D10 also sets out requirements to maintain a safe and secure environment and reduce the fear of crime. These policies will result in a positive impact for LGB people as they are more likely to be victims of violent crime than heterosexual people.
- 10.2.3 Policies D1 and D7 also seek to ensure that places including the public realm are designed to be inclusive, comfortable and inviting. These policies are likely to positively impact LGB people as some LBG people avoid being open about their sexual orientation in public for fear of a negative reaction¹⁵⁸.
- 10.2.4 Policy D12 requires that the Agent of Change principle is applied to new development. This places the responsibility for mitigating the impacts of noise and other nuisances (e.g. noise from a nearby existing pub or club) on the new development not the existing noise generating use. London has lost 58% of its LGBT+ night time venues in the past decade¹⁵⁹, this policy will help to support the retention of LGBT+ venues along with other venues, which will positively impact on LGB people.

10.3 Chapter 4: Housing

- 10.3.1 There is an absence of data to identify the extent to which people who are lesbian, gay or bisexual (LGB) experience barriers to accessing suitable accommodation due to their sexual orientation. There is some evidence that LGB Londoners are more likely to be experience or expect differential treatment by social housing providers and landlords¹⁶⁰ and some evidence that, nationally, LGB young people are more likely to

¹⁵⁸ EHRC 2016, 'Is England Fair: The State of Equality and Human Rights 2016

¹⁵⁹ LGBTQ+ Cultural Infrastructure in London: Night Venues, 2006–present, UCL Urban Laboratory

¹⁶⁰ Affinity Sutton, 'LGBT Experiences of Housing: A snapshot', July 2015

be homeless than their non-LGB peers (with the exception of people who share the protected characteristic of gender reassignment who are included within these statistics)¹⁶¹. Policies to support alternative models of delivery including community land trusts and specialist co-housing (H2) as well as policies to ensure provision of specialist housing (H14) may also have the potential to positively benefit LGB people who face barriers to accessing housing based on their sexual orientation. Policies aimed at increasing the scale and pace of delivery of housing (including affordable housing) generally might be expected to have indirect positive impacts through a delivering more homes and more genuinely affordable homes to meet a range of needs.

- 10.3.2 Most of the actions that are key to ensuring housing is inclusive for this group such as how it is managed, and where relevant, allocated, sit outside of the planning system and therefore outside the scope of the Plan. Reducing barriers to housing and other services for LGB Londoners is a priority of the Mayor's Equality Diversity and Inclusion Strategy and the Mayor's Housing Strategy.

10.4 **Chapter 5: Social infrastructure**

- 10.4.1 S1 requires boroughs to undertake a needs assessment of social infrastructure to meet the needs of London's diverse communities, and states that development proposals should be supported where they provide high quality inclusive social infrastructure. This could be of benefit to LGB people who may face barriers to accessing, or not feeling comfortable in accessing certain types of social infrastructure, due to a fear of discrimination or past experience of acts of abuse. At the UK level, 47 cent of people felt personally discriminated against or harassed because of their sexual orientation¹⁶². Ensuring that social infrastructure provision is planned to be inclusive will help to advance equality of opportunity and reduce discrimination for LGB Londoners. Although the extent to which this is achieved in practice, will be heavily dependent on the detailed design, operation and management of these facilities that are areas outside the scope of the plan.
- 10.4.2 S4 highlights the need for formal play provision to be inclusive but also to feel safe and welcoming. While this will benefit everyone, it may particularly benefit some LGB people, such as young adults or by association as parents or carers of children, whom may feel less comfortable accessing these spaces.

¹⁶¹ For example The Albert Kennedy Trust 'LGBT Youth Homelessness: a UK national scoping of cause, prevalence, response and outcome' 2015

¹⁶² EHRC 2016, Is England Fairer? The state of equality and human rights 2016

- 10.4.3 LGB people also face specific challenges in terms of health care provision. They are at greater risk of poor mental health compared with those identifying as heterosexual¹⁶³, and particularly in later life in terms of end of life care older LGBs faced discrimination due to a lack of recognition of their relationships by other family members and healthcare professionals¹⁶⁴. S2 requires boroughs to work with CCGs and other NHS and community organisations to understand local health and social care needs, using Joint Strategic Needs Assessments (JSNA) to understand local priorities, and plan for them accordingly. This is likely to benefit many LGB people by helping to ensure that facilities and services are available in the right locations. It should however be recognised that many of the barriers cited by LGB people relate to staff training and awareness, which are areas that are outside the scope of the Plan.
- 10.4.4 LGB students also face barriers to accessing education. Whilst S4 sets out a framework for the delivery of education and childcare facilities to meet demand and offer educational choice, many of the barriers LGB students face relate to discrimination or bullying¹⁶⁵, which are outside the scope of the Plan.

10.5 **Chapter 6: Economy**

- 10.5.1 For policies in this chapter, no specific key positive or negative impacts have been identified for this protected characteristic.

10.6 **Chapter 7: Heritage & Culture**

- 10.6.1 Working alongside D1, Policy HC1 requires boroughs to develop an understanding of the value of the historic environment, recognising that local communities provide a valuable source of information in understanding the value of the historic environment and how it contributes to the character and identity of a place. The policies explicitly recognise the influence of past human cultural activity from all sections of London's diverse community. This will particularly benefit LGB Londoners by ensuring that the cultural heritage of specific groups is recognised and protected.

¹⁶³ EHRC 2016, Is England Fairer? The state of equality and human rights 2016

¹⁶⁴ Bristowe, Marshall and Harding, 2015,(EHRC) 2016, , Is England Fairer? The state of equality and human rights 2016

¹⁶⁵ EHRC 2016, Ditch the Label, 2015, EHRC 2016, Is England Fairer? The state of equality and human rights 2016

- 10.6.2 HC5 encourages boroughs to develop an understanding of the existing cultural offer in their areas and consider how it serves different groups of people, explicitly recognising that LGB Londoners may feel excluded from town centres and the night time activities and that this should be considered. The policy protects existing cultural venues and support the development of new ones. With over half of LGBT+ venues closing since 2006¹⁶⁶, this will particularly benefit members of the LGB community. Pubs also play an important role in bringing people together and meeting the needs of particular communities. By protecting pubs that provide a social, heritage, cultural or economic value, HC7 is likely to benefit LGB groups who may particularly value these spaces as safe and welcoming spaces that they can access without fear of discrimination or harassment.
- 10.6.3 The overall promotion of a more diverse evening and night time economy is also likely to benefit LBG Londoners in terms of broadening the appeal of the night-time economy to a wider range of people. However, the promotion of the night-time economy might also have had a negative impact on people who come under this protected characteristic, who might feel more at risk at night of verbal and physical attack¹⁶⁷. Policy HC6 requires boroughs to work with landowners, businesses and the police to reduce these barriers to the night-time economy such as improving safety and security in town centres and public realm. The availability of safe and convenient public transport near night-time economy venues is also likely to positively benefit people who share this protected characteristic and HC6 aims to ensure that venues are well-served in this regard.

10.7 **Chapter 8: Green Infrastructure**

- 10.7.1 Alongside policy D3 and D7, policies such as G3 and G4¹⁶⁸ can help to make open spaces more inclusive, safe and welcoming in their design. A key element of inclusive design is that spaces can be used safely easily and with dignity by all – this is important given that given hate crime is a concern for people who share this protected characteristic¹⁶⁹. The extent of the positive impacts will depend on local circumstances (through the Local Plan process or local planning decisions) however certain green infrastructure policies, alongside other policies in

¹⁶⁶ LGBTQ+ Cultural Infrastructure in London: Night Venues, 2006–present, UCL Urban Laboratory

¹⁶⁷ EHRC, 2016, Is England Fairer? The state of equality and human rights in 2016.

¹⁶⁸ The supporting text for policy G3 encourages proposals to enhance access to MOL, addressing poorer quality areas for example by through inclusive design. The supporting text of policy G4 encourages inclusive design in relation to other types of local protected open spaces.

¹⁶⁹ EHRC, 2016, Is England Fairer? The state of equality and human rights in 2016.

the plan, have the potential to make a positive impact for this group.

10.8 **Chapter 9: Sustainable Infrastructure**

10.8.1 No specific key positive or negative impacts have been identified for this protected characteristic.

10.9 **Chapter 10: Transport**

10.9.1 Working alongside design policies D1, D3, D7 and D10, Policy T2 Healthy Streets aims to create inclusive streets and spaces where people feel safe.

10.9.2 Some LGB people experience discriminated or harassment because of their sexual orientation¹⁷⁰. There may also be some evidence that the frequency of public transport use is affected more for LGB Londoners than the wider population by concerns over crime and anti-social behaviour¹⁷¹.

10.9.3 The Healthy Streets approach, along with policy D7, to designing streets and the external environment is therefore likely to have a positive impact on LGB Londoners through measures to increase feelings of personal safety and ensure a more pleasant environment is achieved.

10.9.4 The Mayor's Transport Strategy also contains focussed complementary measures that prioritise tackling crimes such as hate crime and sexual offences - LGB Londoners are significantly more likely to have experienced unwanted sexual behaviour on and around public transport than heterosexual Londoners¹⁷².

10.9.5 Other barriers reported by LGB Londoners include overcrowded services and slow journey times¹⁷³. Along with measures in the Mayor's Transport Strategy, Policies T1 and T3 help to mitigate these issues by ensuring sufficient and appropriate transport infrastructure to support London's growth.

¹⁷⁰ EHRC 2016, Is England Fairer? The state of equality and human rights 2016

¹⁷¹ Transport for London (2015) Travel in London: Understanding our Diverse Communities, pg. 316.

¹⁷² Transport for London (2016) Safety and Security Annual Report 2015, pg. 30.

¹⁷³ ¹⁷³ Transport for London (2015) Travel in London: Understanding our Diverse Communities, pg. 314.