

Appendix 4 Table of Response

Introduction

This tabulated response addresses the Panel's request to respond to supplementary written statements to Matter 2 with regards to the general points of principle raised about the approach of the equalities impact assessment and the specific policies referred to. There have been seven additional statements received from the following:

- [HEAR Equality \(1896\)](#)
- [Just Space Part 1 \(2718\)](#)
- [Just Space Part 2 - LGBTQ \(2718\)](#)
- [Just Space Part 3 - Lucy Rogers \(2718\)](#)
- [London Gypsies and Travellers \(255\)](#)
- [Sharma, Meenakshi \(1877\)](#)
- [Trust for London \(1296\)](#)

This tabular response is part of the overall response and should therefore be read as such. That has been done to assist the reader and to avoid unnecessary repetition. It should be read in conjunction with the main response document, Appendix 2 which sets out the legal note on the case law and legal implications raised by respondents, and Appendix 3 which is the summary report of the specific implications of the Plan on each of the 9 protected characteristics.

It should be noted that where a similar comment has been made by different respondents, the answer has been repeated as necessary.

Comments that relate to detail that sits within the summary document is referred as such.

Finally, the GLA would wish to make it clear and therefore remove the need to repeat it throughout the tabular response that it is aware of its duties under the PSED and has fulfilled these in the drafting of the New London Plan itself and in the development of the suite of Mayoral Strategies. The evidence base for these is shared, and decisions taken on the content of the draft Plan (including minor changes) incorporate officers' professional understanding across that full evidence base as well as on the basis of the Integrated Impact Assessment.

Written Representation	ID	Comment	Response
<p><u>HEAR Equality (1896)</u></p>	<p>1.</p>	<p>Reference to the Bracking v Secretary of State for Work and Pensions [2013]. Summary of key principles included:</p> <ul style="list-style-type: none"> - PSED is “not a duty to achieve a result”, but to have due regard to the need to achieve the goals identified in section 149(1) of the Equality Act 2010 - The equality duties are an integral and important part of the mechanisms for ensuring the fulfilment of the aims of anti-discrimination legislation - It is not sufficient for the decision-maker to have a vague awareness of their legal duties, instead they must have a focused awareness of each of the section 149 duties and their potential impact on the groups - The duty must be fulfilled before and at the time when a particular policy is being considered, and not as a “rear-guard action” - The PSED involves a duty of inquiry, a public authority must be properly informed before taking a decision. If the relevant material is not available, there is a duty to acquire it, frequently through consultation with relevant groups 	<ul style="list-style-type: none"> - See main cover note.

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		When there are large numbers of vulnerable people, very many of whom fall within one or more of the protected groups, the due regard necessary to discharge the duty is “very high”	
<u>HEAR Equality (1896)</u>	2.	The IIA does not consider the particular impacts on persons with protected characteristics. Neither ‘detailed matrices’ nor IIA note positive or negative impacts on protected characteristics, despite containing a key to assess.	<ul style="list-style-type: none"> - Reference is made to specific equalities groups throughout the IIA Report, either in the policy summary or in the recommendations with a detailed summary within the policy review spreadsheets. For each policy assessment, specific equalities receptors were identified, showing which groups would be most likely impacted by the policy implementation. The qualitative narrative provides the rationale for these assessments. - In response to the Panel’s request, appendix 3 provides a brief summary of the specific implications of the Plan for each of the 9 protected characteristics is published alongside this document.
<u>HEAR Equality (1896)</u>	3.	<p>IIA equality is treated generically. In the detailed matrices, the impacts on protected characteristics are noted as ‘Y’ or ‘N’ under Receptors and/or affected groups’.</p> <p>The narrative summary summarises against overall objectives of the NLP (not narrative of the impact on protective characteristics, plans to mitigate negative impacts, research, references)</p>	<ul style="list-style-type: none"> - An integrated approach to the assessment was considered the most appropriate as it allowed the assessment of sustainability, health, equalities and community safety impacts to be assessed in a single report which could identify cross-cutting impacts. This integrated approach is common practice for local authority plan making and has been undertaken for the previous London Plans and other Mayoral Strategies. - The narrative in the supporting matrices considers the impact on protected characteristic groups identified for each specific policy (‘Y’), and reference to specific receptors are drawn out in the

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			<p>narrative where the impact is considered differential. The IIA report summarised the findings for all the assessments using a summary narrative and matrix in a more proportionate format and again, drew upon specific protected characteristics in the text where appropriate.</p> <p>In addition, in response to the Panel’s request, appendix 3 provides a brief summary of the specific implications of the Plan for each of the 9 protected characteristics.</p>
<p><u>HEAR Equality (1896)</u></p>	<p>4.</p>	<p>IIA, addendum and matrices are incomplete with many gaps (including unknowns, greyed out, N/A – with no clear explanation)</p>	<ul style="list-style-type: none"> - In the IIA Report, Table 17 of the IIA Methodology sets out the definition for the unknowns within the assessment matrices (‘?’). The definition includes: <i>‘This significance criterion is applied to effects where there is insufficient information to make a robust assessment. It is also applied to the assessment of options that can have both positive and negative effects and it is not clear whether the positive or negative effects outweigh each other.’</i> This is used in instances where the outcome depends on a range of factors, and it is not clear cut as to how receptors are likely to be impacted. - Table 17 sets out the definition for those objectives not considered appropriate for that policy (‘N/A’): <i>This is applied to objectives that are clearly not affected by the option or policy being assessed.</i> - Greyed out boxes identify where there are no guiding questions for that relevant assessment under the relevant objective. This methodology was set out and consulted upon in the IIA Scoping Report.

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<u>HEAR Equality (1896)</u>	5.	The narrative appraisal of impacts on equality streams is not reflected in some matrices in either IIA or 'detailed matrices'.	<ul style="list-style-type: none"> - The policy matrices summarised the findings of the EqIA by showing an overall assessment score against the IIA objectives, identifying which protected characteristics are likely to be impacted by a Policy and drawing out implications in the narrative text. In response to the Panel's request, appendix 3 provides a brief summary of the specific implications of the Plan for each of the 9 protected characteristics
<u>HEAR Equality (1896)</u>	6.	Policy GG1 'Building strong and inclusive communities' option 1 (Infra-structure led) in both IIA and 'detailed matrices' narratives describe negative impacts on disabled people and those with higher needs for affordable accommodation. In the IIA, however the EqIA are marked +, ?/+ or n/a in all but one cell of the matrix, whilst in the 'Receptors and/or affected groups column' in the 'detailed matrices' all protected characteristics and low income are given a 'Y' (except a few LGBT marked 'N' -Failure to find evidence for details) contradicting the evidence in the neighbouring column.	<ul style="list-style-type: none"> - The summary scores in the IIA report give an overall judgement against the objective, which balances a range of considerations. For example, in some case, a policy may considered have positive impacts, even if the supporting narrative in the matrices acknowledge some uncertainties or caveats. - For Policy GG1 Option1 (infrastructure led), the '?' element of the score was intended to reflect the uncertainty mentioned in the narrative. On balance and if implemented as intended the option should have positive impacts on several fronts. The intention of the scoring was to flag the risk, mentioned in the narrative, that although the Option is focused on inclusive accessibility, pursuing a purely market-led approach to delivery might introduce some tension between objectives if not appropriately regulated or mitigated.
<u>HEAR Equality (1896)</u>	7.	In option 3 for GG1, 'Participation and citizen-led' the appraisals describe benefits to diversity, engagement of 'hard to reach' groups, inclusivity, community	<ul style="list-style-type: none"> - The matrix scores given for GG1 option 1 and Option 3 are not substantially similar:

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		<p>cohesion etc., however the matrices are similar to that of option 1. One noticeable difference is this approach being marked as having no impact on “maintaining and strengthening London’s position as a leading... global city and... support a strong, diverse and resilient economic economy structure providing opportunities for all”, despite the narrative.</p> <p>The two options for GG1 will have (potentially opposing) cumulative impact on protected characteristics. The ‘Potential cumulative effects’ column in the ‘detailed matrices’ document is, however, either empty or N/A throughout (apart from a handful that include a pasted statement about links to other policies or strategies).</p>	<p>GG1 Building Strong & Inclusive Communities – Option 1 (Infrastructure Led)</p> <table border="1" data-bbox="1160 368 2136 592"> <thead> <tr> <th colspan="20">EQIA</th> </tr> </thead> <tbody> <tr> <td>Short Term</td> <td>?</td><td>?</td><td>?</td><td>n/a</td><td>?</td><td>-</td><td>?</td><td>+</td><td>+</td><td>+/?</td><td>+</td><td>n/a</td><td>n/a</td><td>+</td><td>n/a</td><td>?</td><td>n/a</td><td>+</td><td>+</td><td>n/a</td><td>n/a</td> </tr> <tr> <td>Medium Term</td> <td>?</td><td>?</td><td>?</td><td>n/a</td><td>?</td><td>-</td><td>?</td><td>+</td><td>+</td><td>+/?</td><td>+</td><td>n/a</td><td>n/a</td><td>+</td><td>n/a</td><td>?</td><td>n/a</td><td>+</td><td>+</td><td>n/a</td><td>n/a</td> </tr> <tr> <td>Long Term</td> 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HEAR Equality (1896)	8.	Equalities impacts not analysed as rigorously as required, with no reference to case law.	<p>- See main cover note for case law implications.</p> <p>- See also appendix 3, which responds to the Panel’s request for brief summary of the specific implications of the Plan for each of</p>																																																																																																																																																																																																																																																																																																																

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		<p>For example, Policy H10 prior to consultation did not refer to any negative impacts. Following consultation, in response to Just Space submission, the IIA addendum noted “potential to fragment community networks” “reduce the security of residents” and to “cause disruption to families and communities” generally to communities (p:59, addendum). Due regard, however was not taken, to consider the particular impacts on protected groups despite evidence in case law (R (oao Buckley) v Bath and North East Somerset [2018] EWHC 1551 (Admin)) and research (e.g. older and disabled people, BAME and disproportionately likely to live in housing which will be the subject of these policies.)</p>	<p>the 9 protected characteristics is published alongside this document.</p>
<p><u>HEAR Equality (1896)</u></p>	<p>9.</p>	<p>Policy H12 proposes housing sizes from one to two bedrooms to family homes and Boroughs not set policies or guidance that requires set proportions of different sized units. Trust for London in their submission evidence BAME and faith communities (e.g. Somali community, ultra-Orthodox Jewish community) are more likely to have large families and are therefore impacted by current and future scarcity of family size</p>	<p>- See appendix 3, which responds to the Panel’s request for brief summary of the specific implications of the Plan for each of the 9 protected characteristics.</p>

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		homes. The IIA and ‘detailed matrices’ do not reflect these intersectional realities. There is just a ‘Y’ against race and religion with no mention of any evidence.	
<u>HEAR Equality (1896)</u>	10.	General failure to find or accept evidence - Inclusion London and others (consultation submissions) specifically raised the lack of detailed EqIA so Arup/ GLA had experts highlighting the lack of evidence and due regard by March 2018 at the latest. Responses (pp:2,8,12, addendum) demonstrate consultants’ lack of understanding of statutory equality duties.	<ul style="list-style-type: none"> - See main cover note. - The requirement for a detailed EqIA was noted on p8 and p12 of the Addendum report. The response simply flagged that the EqIA was incorporated into the IIA.
<u>HEAR Equality (1896)</u>	11.	It appears from narratives and matrices that consultants have substituted protected characteristics for ‘low income’ for many considerations. It cannot be assumed that policies designed to work for those with low income will have positive impacts on ‘protected characteristics’. Instead ‘generic’ options, where due regard has not been taken, could instead unwittingly repeat discriminatory practices.	<ul style="list-style-type: none"> - Low-income groups were included in the assessment, as these groups form relevant considerations in achieving inclusive growth. It is acknowledged within the IIA report that low-income groups can have overlapping characteristics with protected characteristic groups. Low-income groups did not however substitute the assessment on protected characteristics. In line with the methodology, the assessment considered the impacts on those who share protected characteristics under the Equality Act, whilst also having consideration for low-income and deprivation. - It is acknowledged that this report was not specifically considered in the assessment however many of its findings confirm some of the judgements made. As it has now been submitted as

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		<p>E.g. In the ‘detailed matrices’ LGBT people were considered as not benefiting from policies that impact on those with low income, however in London “research highlight[s]... LGBT people[do]... not [have] the profile typically associated with financial hardship or low-income (e.g. high level of respondents in poverty having received Higher Education)” (p:10, “Still Out There: An Exploration of LGBT Londoners un-met need”, LGBT Consortium and Angela Ruskin University, 2016)</p>	<p>evidence, as part of the GLA’s ongoing duty, it will form part of the overall evidence base.</p> <ul style="list-style-type: none"> - Other elements in the report such as prejudice or discrimination, however, are picked in relevant policy assessments such public realm, healthy streets, etc where the design of the built environment can influence people’s behaviour, or the provision or funding of social infrastructure and its emphasis around integrated service delivery and cross borough working are picked up in the social infrastructure policies and DF1. However, other prejudices or discrimination faced which have been identified in the report such as through specific service delivery, for example in relation to assisted living for older LGBT people and attitudes of staff or issues such as substance abuse or the allocation of social housing are not within the remit of the Plan.
<p><u>HEAR Equality (1896)</u></p>	<p>12.</p>	<p>Arup provide incomplete matrices, no references, research, details of consultation events or expert equality engagement.</p>	<ul style="list-style-type: none"> - The GLA has a common evidence base upon which to draw on for the various Mayoral Strategies. - In terms of engagement, a number of equalities organisations were involved in the development of the IIA Framework and consultation on the Scoping Report, this included Inclusion London, Equality and Human Rights Commission and Just Space which represents over 250 community organisations including some equality groups such as Queer Spaces Network, Race of the Agenda, Age UK, etc). - During the City for All Londoners Consultation, prior to the draft Plan, a number of workshops, including a specific equality and

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			<p>inclusion one, were held to discuss key issues that might inform the development of all strategies. In addition, a series of focus groups were held specifically targeting people who fell under protected characteristics.</p> <ul style="list-style-type: none"> - As required by the GLA Act, the London Plan and the other Mayoral Strategies are required to be internally consistent with each other. Many of the policies within the London Plan overlap with other policies within the other strategies, eg Housing, Environment, Transport, Economic, Culture, etc. Therefore, any informal or formal engagement on the development of the Mayoral Strategies were fed back to all other strategy teams, including the London Plan – and discussions between relevant policy officers from each strategy took place where the engagement from one strategy influenced the policy of another. This included specific engagement with equalities groups as part of the Mayor’s Equality and Inclusion Strategy in summer 2017. - During the preparation of the Plan, a number of equalities groups including for example Gypsies and Travellers and the Disabled Access Panel were also informally consulted. - During the consultation on the draft London Plan itself, there were over 100 events, including two specifically aimed at community groups including a specific equality focused event that was attended by over 130 representatives. The formal consultation on the Plan again also included more targeted engagement with specific groups such as Gypsies and Travellers and Disabled Access Groups. Details of these are set out in the Mayor’s Response to the Panel’s Notes NLP/EX/03 and NLP/EX/16a.

Written Representation	ID	Comment	Response
<u>HEAR Equality (1896)</u>	13.	The ordering of the preferred option could be seen to indicate that the detailed matrices did not lead to the selection of preferred options with due regard to equalities impacts and planned mitigations.	<ul style="list-style-type: none"> - The ordering of the options was not intended to signify anything, and no meaning should be inferred.
<u>HEAR Equality (1896)</u>	14.	Generally, the preferred options are a combination of the proposed (usually 3) options. The impact matrices of the preferred option rarely reflect a combination of the cells of proposed options. There is no indication as to split/weight of investment/ratio between the proposed options within the preferred option or reasoning and impacts for the preferred option.	<ul style="list-style-type: none"> - The proposed options and preferred options were all assessed individually, as standalone policies. The preferred option does not equal the sum of the proposed options but draws upon the most desirable characteristics of a number of policies. There was neither weighting nor summing of policy assessments or scores.
<u>HEAR Equality (1896)</u>	15.	Stonewall housing, an LGBT+ housing organisation, raised the fact that the policies did not consider LGBT housing needs. GLA/Arup's response is that LGBT people are referenced in policies HC5 and HC7, 'cultural provision' (p:8, addendum); evidence of negative impact on a protected characteristic did not precipitate due	<ul style="list-style-type: none"> - Please see appendix 3, which responds to the Panel's request for brief summary of the specific implications of the Plan for each of the 9 protected characteristics.

Written Representation	ID	Comment	Response
		regard but rather a response that could be seen as discriminatory unconscious bias.	
<u>HEAR Equality (1896)</u>	16.	A large number of written consultations were submitted to the GLA NLP that should have been used to enable statutory bodies to show due regard. Over 50 submissions working on equality were received yet the 'Summary of Consultation Responses' contains only one mention of equality in one submission.	<ul style="list-style-type: none"> - Due to the large number of consultation responses (4,000 representations resulting in over 21,000 individual comments), only responses that specifically mentioned EqIA or IIA were labelled as IIA comments and were reported and responded to within the IIA Addendum Report. In some cases, this additional information altered the policy score and associated narrative. In the addendum report, an additional section was added to the assessment summary narrative for each policy where this was the case and any score changes were highlighted in bold in the matrices. - However, all 21,000+ individual comments to the Plan were analysed and any changes considered appropriate were addressed as part of the minor suggested changes and were assessed as part of the IIA Addendum Report as appropriate.
<u>HEAR Equality (1896)</u>	17.	Responses that the NLP is a strategic or 'high level' plan or that detail on equalities impacts will be collected during future monitoring or at a Borough-level are untenable. EqIA cannot be produced after a decision has been made or retroactively amended. That is because the purpose of the EqIA is to fulfil the duty before and at the time when a	<ul style="list-style-type: none"> - See main cover report in relation to case law implications. - In terms of monitoring, a set of indicators will be consulted upon in the summer that can be used to assess the effects of the Plan. Many of the indicators will be drawn from the other Mayoral Strategies to ensure consistency of reporting and use of a common evidence base.

Written Representation	ID	Comment	Response
		particular draft is being considered (see Kaur & Shah v LB Ealing above)	
<u>HEAR Equality (1896)</u>	18.	Comments about technical language or complex issues say more about unconscious bias and structural discrimination than about Londoners from 'protected characteristics' ability to understand planning documents or human rights law.	<ul style="list-style-type: none"> - In all technical assessment and reporting there is a judgement to be made about the correct level of detail to provide that allows stakeholders and the public to be informed about content and process in manner than supports, rather than creates barriers to, participation.
<u>HEAR Equality (1896)</u>	19.	One of the best ways to gather evidence is to consult and engage with those with expertise. Even without the requirement to find evidence the Mayor is has statutory duties to consult and engage. Concerns about timings, accessible information, digital by default exclusions, engagement events are well documented, but as an example the time given for consultation (by GLA own dates) on the draft NLP and 400+ pages of the IIA was from 1st Dec 2017 - 2nd March 2018, 91 days over the Christmas period.	<ul style="list-style-type: none"> - The draft London Plan and IIA was consulted upon for over 13 weeks, which is more than the statutory consultation period for Planning Document of 12 weeks. This was considered appropriate and reasonable and met the statutory requirements. - All reasonable requests were addressed in a timely manner as far as possible within the resources of the team, including requests to come and talk the Plan through with individual groups and publication of accessible material. Further details of engagement are set out in NLP/EX/03.
<u>HEAR Equality (1896)</u>	20.	The fact that the Mayor has generally consulted on the draft NLP does not discharge his duty of inquiry specifically in respect of discharging the PSED.	<ul style="list-style-type: none"> - See main cover note in regard to the Duty. - A number of equalities organisations were involved in the development of the IIA Framework and consultation on the Scoping Report, this included Inclusion London, Equality and

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			<p>Human Rights Commission and Just Space which represents over 250 community organisations including some equality groups such as Queer Spaces Network, Race of the Agenda, Age UK, etc).</p> <ul style="list-style-type: none"> - During the City for All Londoners Consultation, prior to the draft Plan, a number of workshops, including a specific equality and inclusion one, were held to discuss key issues that might inform the development of all strategies. In addition, a series of focus groups were held specifically targeting people who fell under protected characteristics. - As required by the GLA Act, the London Plan and the other Mayoral Strategies are required to be internally consistent with each other. Many of the policies within the London Plan overlap with other policies within the other strategies, eg Housing, Environment, Transport, Economic, Culture, etc. Therefore, any informal or formal engagement on the development of the Mayoral Strategies were fed back to all other strategy teams, including the London Plan – and discussions between relevant policy officers from each strategy took place where the engagement from one strategy influenced the policy of another. This included specific engagement with equalities groups as part of the Mayor’s Equality and Inclusion Strategy in summer 2017. - During the preparation of the Plan, a number of equalities groups including for example Gypsies and Travellers and the Disabled Access Panel were also informally consulted. - During the consultation on the draft London Plan itself, there were over 100 events, including two specifically aimed at

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			<p>community groups including a specific equality focused event that was attended by over 130 representatives.</p> <ul style="list-style-type: none"> - The formal consultation on the Plan again included more targeted engagement with specific groups such as Gypsies and Travellers and Disabled Access Groups. - In terms of discharging the PSED, as it is an ongoing duty, the EqIA will be updated as appropriate following discussions as part the Examination on the Plan and in response to additional evidence submitted.
<u>HEAR Equality (1896)</u>	21.	The lack of a clear schedule of publications, time given for consultation, accessible versions of the NLP/IIA ('reasonable adjustments' are an anticipatory statutory duty), or paperwork in community languages, and the Inspectors having to request EqIA, adds to concerns that the GLA and their consultants are unable to demonstrate having due regard.	<ul style="list-style-type: none"> - See main cover note.
<u>Just Space Part 1 (2718)</u>	22.	Whilst JS welcomes the publication of the further information, this should have been made available prior to the opening of the EiP.	<ul style="list-style-type: none"> - The policy assessment matrices were not initially published because the level of detail was judged likely to be disproportionate. However, in response to the Panel's request in in January they were published.

Written Representation	ID	Comment	Response
<u>Just Space Part 1 (2718)</u>	23.	The Panel has not been provided with sufficient information or the right sort of information which would enable it to reach its own view on the draft Plan's equalities impact in order to discharge their own duty under the PSED – particularly in relation to whether the equalities information provided by the GLA satisfies the requirement of the PSED	- See main cover note.
<u>Just Space Part 1 (2718)</u>	24.	The legal principles on the PSED are well-established and were helpfully summarised in <i>Bracking v Secretary of State for Work and Pensions</i> [2013] And <i>(R (Hajrula) v London Councils</i> [2011] EWHC448 (Admin), the High Court held (at § 62))	- See main cover note
<u>Just Space Part 1 (2718)</u>	25.	Supplementary document does not explain how equalities data was gathered. It is not clear what data sources the GLA have relied on, whether	- As set out in the supplementary information, the EqIA was based on a large amount of information including, but not limited to, the IIA baseline set out in the Scoping Report, consultation input and

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		<p>the EqIA was an entirely desk-based exercise or whether further inquiry/consultation took place with representative groups of those with protected characteristics</p>	<p>the professional experience and judgement of the assessment team.</p> <ul style="list-style-type: none"> - The GLA has a common evidence base upon which to draw on for the various Mayoral Strategies. - A number of equalities organisations were involved in the development of the IIA Framework and consultation on the Scoping Report, this included Inclusion London, Equality and Human Rights Commission and Just Space (which represents over 250 community organisations including some equality groups such as Queer Spaces Network, Race of the Agenda, Age UK, etc). - During the City for All Londoners Consultation, prior to the draft Plan, a number of workshops, including a specific equality and inclusion one, were held to discuss key issues that might inform the development of all strategies. In addition, a series of focus groups were held specifically targeting people who fell under protected characteristics. - As required by the GLA Act, the London Plan and the other Mayoral Strategies are required to be internally consistent with each other. Many of the policies within the London Plan overlap with other policies within the other strategies, eg Housing, Environment, Transport, Economic, Culture, etc. Therefore, any informal or formal engagement on the development of the Mayoral Strategies were fed back to all other strategy teams, including the London Plan – and discussions between relevant policy officers from each strategy took place where the engagement from one strategy influenced the policy of another.

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			<p>This included specific engagement with equalities groups as part of the Mayor's Equality and Inclusion Strategy in summer 2017.</p> <ul style="list-style-type: none"> - During the preparation of the Plan, the GLA informally consulted with a number of equalities groups including for example Gypsies and Travellers and the Disabled Access Panel. - During the consultation on the draft London Plan itself, there were over 100 events, including two specifically aimed at community groups including a specific equality focused event that was attended by over 130 representatives. The formal consultation on the Plan again included more targeted engagement with specific groups such as Gypsies and Travellers and Disabled Access Groups.
<u>Just Space Part 1 (2718)</u>	26.	Section 4 of the Supplementary Document highlights those policies which, in very broad terms, it says will have a positive impact on equalities. It does not say which policies will not meet those aims and which will give rise to differential negative impacts.	<ul style="list-style-type: none"> - In response to the Panel's request, a brief summary of the specific implications of the Plan for each of the 9 protected characteristics is published alongside this document
<u>Just Space Part 1 (2718)</u>	27.	The IIA and the IIA Addendum report do not in themselves disclose any information about the equalities impact of the draft policies on protected groups. That appears to be common ground and is the reason why the GLA was required to publish the underlying assessment tables in which it claims it assessed those particular impacts. The issue for	<ul style="list-style-type: none"> - The purpose of an integrated approach to the assessment was to identify cross-cutting impacts as part of an iterative process. The approach is common practice for local plan preparation and has been undertaken for the previous London Plans and other Mayoral Strategies. - The EqIA used 24 objectives and supporting guiding questions to assess the policy impact. This was undertaken using large matrices which scored the policy against the relevant objectives,

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		<p>the Panel is whether the additional information in the assessment tables and SD “corrects” the serious omission in the IIA itself.</p>	<p>identified which protected characteristics were potentially affected by the policy in relation to the objective, and provided narrative on the impact, making reference to specific protected characteristic where the impact was considered differential. This was done for each iteration of policy development. Mitigation measures were recommended to reduce any potential negative impacts identified</p> <ul style="list-style-type: none"> - An IIA Report was published, which summarised the assessment of each policy against the four assessments (sustainability, health, equalities and safety). Protected characteristics were referenced specifically in the report summary where appropriate. The publication as one report sought to present the assessment in a proportionate and transparent manner by providing summary tables and colour-coded matrices of the impact of the policies. - Following the initial Examination session in January, the final detailed equalities matrices were published to show the assessment process that occurred during the drafting of the London Plan and that underpinned the IIA itself. - In response to a further request by the Panel, a brief summary of the specific implications for the 9 protected characteristics is now published alongside this document.
<p><u>Just Space Part 1 (2718)</u></p>	<p>28.</p>	<p>The presentation of the GLA’s chosen approach is difficult to follow and obscures the specific, and in particular negative differential impacts of the policies on particular groups.</p>	<ul style="list-style-type: none"> - The publication of an integrated report sought to simplify and reduce of the length of the report and convey the impact of the policies on the objectives in a way that was considered proportionate. - The use of the matrices in the IIA report were intended to improve ease of access to information. The colour coded scores

Written Representation	ID	Comment	Response
			<p>were intended to clearly summarise and communicate impacts against the objectives.</p> <ul style="list-style-type: none"> - A number of the policies and specific objectives within different policies scored negatively against some of the protected characteristics. Where this occurred, recommendations were provided to avoid or reduce the magnitude of the adverse effects. - In cases where recommendations were not accepted, the GLA provided an explanation as to why the proposed mitigation was not appropriate -this is set out in the IIA Report under each policy where relevant. In many cases the recommendation was not accepted because, it was addressed elsewhere in the Plan, addressed in another Mayoral Strategy or it was felt it was not in the remit of the strategic plan and was more appropriately addressed at the borough level.
<p><u>Just Space Part 1 (2718)</u></p>	<p>29.</p>	<p>There is no proper explanation in any of the assessment tables/ matrices of how protected groups will be impacted</p>	<ul style="list-style-type: none"> - The EqIA was undertaken using large matrices that scored the policy against the relevant objectives, identified which protected characteristics were potentially affected by the policy in relation to the objective, and provided narrative on the impact, making reference to how specific protected characteristic groups would be impacted when the impact was considered differential. These matrices were published following the initial Examination session in January. - The IIA Report was published, which provided a summary of the integrated assessment. Protected characteristics were again specifically referenced in the report summary where appropriate. The publication of an integrated report sought to simplify and reduce of the length of the report and convey the impact of the

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			<p>policies on the objectives in a way that was considered proportionate.</p> <ul style="list-style-type: none"> - Please also see appendix 3, which responds to the Panel’s request for a brief summary of the specific implications of the Plan on each of the 9 protected characteristics.
<u>Just Space Part 1 (2718)</u>	30.	<p>Policy H10 – Redeveloping existing housing and estate regeneration. The policy “supports the redevelopment of existing housing to achieve higher densities where possible”. The policy expressly anticipates and, in certain circumstances, provides the support for the loss of existing housing where that is replaced at existing and higher densities. Equalities assessment for H10 does not reflect the fairly obvious potential negative impacts for certain protected groups arising from the displacement from and loss of existing homes.</p>	<ul style="list-style-type: none"> - Please see appendix 3, which responds to the Panel’s request for a brief summary of the specific implications of the Plan on each of the 9 protected characteristics - As a result of the consultation responses received, the scoring in the matrix for Objective 2 in the Addendum Report were altered, to include ‘?’. - As part of this revised score, it was acknowledged that estate regeneration can cause potentially negative impacts such as disruption to families, local communities and in some instances the continuity of education for children.
<u>Just Space Part 1 (2718)</u>	31.	<p>Prior to consultation on the IIA and draft plan (Stage D) the IIA did not refer to any negative equalities impacts whatsoever from H10. Following consultation, and in particular the response of JS, the narrative assessment in the IIA addendum noted the policy’s “potential to fragment community networks” “reduce the security of residents” and to “cause disruption to families and communities”</p>	<ul style="list-style-type: none"> - The consultation responses raised a number of issues surrounding the potential for estate regeneration to result in the displacement and fragmentation of communities, and that these potentially adverse effects were not sufficiently represented in the IIA. - As a result, as set out in the IIA addendum report, additional wording was added to the initial policy appraisal above to clarify these potential impacts.

Written Representation	ID	Comment	Response
		(4.20, pg 59). However, the assessment recognised the potential for disruption generally to communities in the narrative, no due regard was had, as required by the PSED, to the particular impacts on protected groups. For example, there was no consideration of the particular impacts that the redevelopment of long-standing social housing would have on older people, the disabled and BAME groups who are disproportionately likely to live in housing which will be the subject of these policies.	<ul style="list-style-type: none"> - Please also see appendix 3, which responds to the Panel's request for a brief summary of the specific implications of the Plan on each of the 9 protected characteristics.
<u>Just Space Part 1 (2718)</u>	32.	The recording of whether the policy is Y/N in terms of a particular objective does not explain how those groups will be impacted by the policy. The table does not describe in qualitative or quantitative terms how the affected groups will be affected (i.e whether that will be positive or negative, in what way they will be impacted and to what extent)	<ul style="list-style-type: none"> - The matrices set out the impact on protected characteristics identified for each specific objective ('Y'), and made reference to specific receptors, which was then drawn out in the narrative where the impact is considered differential. The supporting narrative was intended to provide a qualitative explanation of the key impacts. This approach was considered proportionate.
<u>Just Space Part 1 (2718)</u>	33.	The assessment column does not relate specifically to the protected groups in the receptor column. It appears to aggregate the impacts for each and every group. The aggregation of the impacts obscures the differential impacts of the policy. The	<ul style="list-style-type: none"> - In the matrices, the EqIA considered the impact on protected characteristic groups identified for each specific objective ('Y'), and reference to specific receptors was drawn out in the narrative where the impact is considered differential. The level of detailed

Written Representation	ID	Comment	Response
		assessment table is thus presented in such a way that it is simply not possible to tell how protected groups will be impacted by the policies, whether positively or negatively, on what scale and in what way and therefore what may be done to mitigate such impacts.	<p>of the original report was considered appropriate and proportionate.</p> <ul style="list-style-type: none"> - Please also see Appendix 3, which responds to the Panel’s request for a brief summary of the specific implications of the Plan on each of the 9 protected characteristics.
<u>Just Space Part 1 (2718)</u>	34.	<p>[H10] Given the obvious negative effects of estate redevelopment, which is accepted in the IIA narrative itself (p.59), one would expect to see at least some minus signs in the assessment column and an explanation of how those relate to the protected characteristics. However, there is no evidence that the differential impacts have been assessed at all still less presented clearly for the decision maker.</p> <p>The final matrix claims that all the policy’s including short term impacts will be positive (for all groups) except in relation to objective of “contributing to security” which is found to be “neutral or minor negative” (IIA, pg 60). The final matrix makes no reference whatsoever to particular protected groups and thus completely fails to examine the policy’s impacts on particular groups as required.</p>	<ul style="list-style-type: none"> - Please see Appendix 3, which provides a brief summary of the specific implications of the Plan for each of the 9 protected characteristics - It should also be noted that the IIA Addendum Report amended the assessment to include reference to the potential negative effects of estate regeneration following concerns raised with the scoring as part of the consultation.

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<u>Just Space Part 1 (2718)</u>	35.	Policy H3 Monitoring Housing Targets - the assessment table only records impacts in respect of objectives 5 and 11. In respect of all the remaining 22 objectives and particularly those concerned with equality i.e. objectives 1 and 2 the table records that the impact assessment is “not applicable”. Such a conclusion seems surprising when considering the impacts of housing policy and progress towards delivery of targets on persons with protected characteristics.	Policy H3 simply sets out the approach to monitoring parts of the chapter where guidance is needed to explain how different elements of housing delivery will be counted as part of contributing to the delivery of overall targets, it is not an exhaustive list of monitoring requirements and thus NA is considered appropriate.
<u>Just Space Part 1 (2718)</u>	36.	Policy H3, Objective 5 - The table records the policy impacts on those with protected characteristics by virtue of disability, age and sex but does not say <i>how</i> in respect of those characteristics. It is entirely unclear which protected group is being referred to in that assessment. All that is identified is an overall or “net” positive effect. It fails to explain how the GLA under H3 will collect and monitor the delivery of housing targets and how this will impact on protected groups.	These specific characteristics have been identified as the monitoring refers specifically to specialist housing that may be relevant for those groups. However, as set out above, Policy H3 simply sets out the approach to monitoring parts of the chapter where guidance is needed to explain how different housing delivery will be counted as part of contributing to the delivery of overall targets, it is not an exhaustive list of monitoring requirements.
<u>Just Space Part 1 (2718)</u>	37.	Policy H3, Objective 11 - the assessment records the impacts on a short to long term basis are all	Policy H3 simply sets out the approach to monitoring parts of the chapter where guidance is needed to explain how different housing

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		<p>“unknown” denoted by a “?”. It is not clear, how, if at all this enables the decision-maker to have due regard to the impact of this policy.</p>	<p>delivery will be counted as part of contributing to the delivery of overall targets, it is not an exhaustive list of monitoring requirements.</p>
<p><u>Just Space Part 1 (2718)</u></p>	<p>38.</p>	<p>Policy H12 - The information in the IIA falls well short of what is required by the PSED and does not provide the decision-maker with the full picture of information required to have “due regard” to the equalities impacts of H12. The IIA and final matrix certainly contains no evidence of the particular impacts on protected groups. Even when this is supplemented by the assessment table this defect is not corrected.</p>	<ul style="list-style-type: none"> - Please see appendix 3, which provides a brief summary of the specific implications of the Plan for each of the 9 protected characteristics - The supplementary matrices, published in January, identify potential impacts on older people and families, and more broadly, the narrative focused on groups vulnerable to overcrowding and on lower incomes. - The Policy seeks to ensure a range of sized homes are delivered to meet need and is clear that this should be informed by an understanding of need at the local level. However, the Plan its self has not control over who access the new homes that are built (market or affordable), so it is not possible to provide a definitive view on the impact on particular groups.
<p><u>Just Space Part 1 (2718)</u></p>	<p>39.</p>	<p>[H12] The assessment table tells the reader that except in respect of infrastructure the policy’s impact will be entirely positive. That is to present a Panglossian view which ignores the real impacts of the policy decision not to prescribe family-size housing delivery requirements.</p>	<ul style="list-style-type: none"> - The Policy seeks to ensure that developments deliver a range of sized units and that the mix is informed by a range of factors as set out in H12A - In addition, H12 D explicitly sets out that Boroughs should set out the size requirements for low cost rented accommodation in order to meet identified need, drawing on local evidence of need, including the numbers of overcrowded households. Boroughs have both the information to understand local need for low cost

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		<p>[H12] As Trust for London note in its submission to the EiP certain BME groups (e.g. Somali community, ultra-Orthodox Jewish community) are far more likely to have larger families, and therefore have a greater need for large family-sized homes. Such groups are therefore impacted by the current scarcity of affordable large family size homes and the policy decision not to specifically require their provision. The experience of such groups has been that, during regeneration, they are being asked to move from e.g. three bedroom properties to new-build properties with one or two bedrooms. Such impacts, for example, are not reflected at all in the EqIA.</p>	<p>rented accommodation and the means to ensure these properties meet identified need through their allocation policies.</p> <ul style="list-style-type: none"> - Who can access market homes is dictated to large extent by affordability, the Plan cannot ensure that specific groups benefit from the delivery of any size of homes. Seeking to increase housing delivery generally and ensuring schemes deliver a range of sized homes will help meet a range of needs and can help free up family sized homes that are currently occupied by sharers or people who would downsize if the right accommodation was available
<p><u>Just Space Part 1 (2718)</u></p>	<p>40.</p>	<p>Policy E2, E4, E5 and E6 The EqIA records exclusively positive impacts for the policy. There is not a single negative impact recorded in the IIA or assessment table. The EqIA assessment matrices relating to E4, E5 and E6, the key sections on the matter of meeting London's industrial accommodation needs, are cursory and generic.</p>	<ul style="list-style-type: none"> - These policies are about protecting and retaining existing industrial capacity in London as well as intensifying sites and promoting mixed uses where appropriate. In some circumstances, Policy E7 allows for the loss of non-designated industrial sites to other uses; the implications of this are discussed in appendix 3. - E2 explicitly seeks to maintain a supply of low-cost accommodation.

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		<p>Cut and pasted paragraphs are deployed. There is no recognition in the EqIA matrix text that shortages of accommodation and increased premises costs will very likely have a disproportionately adverse impact on BAME peopled businesses across London and will certainly not support access to employment and reduced unemployment as is glibly claimed (likely the reverse as enterprise is stifled).</p> <p>Failure to relate the assessment element to the receptor groups and explain the nature of the impacts arising in the table and the failure to consider this policy (E2) in the context of other competing policies in the NLP mean that key impacts have been omitted.</p>	
<p><u>Just Space Part 1 (2718)</u></p>	<p>41.</p>	<p>S1 Social Infrastructure The assessment tables do not explain how the identified protected groups have been impacted – the nature or scale of that impact and how it may be overcome. Instead the “objectives-led” approach which fails to relate the “impacts” to the protected groups leaves the reader with the misleading impression that the all of</p>	<ul style="list-style-type: none"> - The matrix for Policy S1 Social Infrastructure specifically mentions a range protected groups in the supporting narrative. - The objectives-led approach with guiding questions enabled the assessment to identify and describe the performance and effects of the plan, using the objectives as ‘targets’ which each policy could contribute towards. This more qualitative approach allowed for the identification and description of impacts.

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		the NLP's impacts are overwhelmingly positive.	<ul style="list-style-type: none"> - In response to the Panel's request, appendix 3 provides a summary of the specific implications of the Plan on each of the 9 protected characteristic.
<u>Just Space Part 1 (2718)</u>	42.	<p>Where there was a lack of information on the draft policies' equalities impacts, the Mayor, through his consultants was required to obtain such information. In practice, this should have involved evidence gathering and consultation with stakeholder groups representing those with protected characteristics (for example older person's charities, mental health groups, LGBT+ and faith groups). There is no evidence of this having happened in a rigorous fashion in the GLA's SD.</p> <p>The fact that the Mayor has generally consulted on the draft NLP does not discharge his duty of inquiry specifically in respect of discharging the PSED.</p>	<ul style="list-style-type: none"> - See main cover report for discussion of legal requirements - A number of equalities organisations were involved in the development of the IIA Framework and consultation on the Scoping Report, this included Inclusion London, Equality and Human Rights Commission and Just Space (which represents over 250 community organisations including some equality groups such as Queer Spaces Network, Race of the Agenda, Age UK, etc). - During the City for All Londoners Consultation, prior to the developing of the draft Plan, a number of workshops, including a specific equality and inclusion one, were held to discuss key issues that might inform the development of all Mayoral strategies. In addition, a series of focus groups were held specifically targeting people who fell under protected characteristics. - As required by the GLA Act, the London Plan and the other Mayoral Strategies are required to be internally consistent with each other. The GLA has a common evidence base on which to draw from in terms of developing the Plan and the other Mayoral Strategies. Many of the policies within the London Plan overlap with other policies within the other strategies, eg Housing, Environment, Transport, Economic, Culture, etc. Therefore, any informal or formal engagement on the development of the Mayoral Strategies were fed back to all other strategy teams,

Written Representation	ID	Comment	Response
			<p>including the London Plan – and discussions between relevant policy officers from each strategy took place where the engagement from one strategy influenced the policy of another. This included specific engagement with equalities groups as part of the Mayor’s Equality and Inclusion Strategy in summer 2017.</p> <ul style="list-style-type: none"> - During the drafting of the Plan, a number of equalities groups including for example Gypsies and Travellers and the Disabled Access Panel were also informally consulted. - During the consultation on the draft London Plan itself, there were over 100 events, including two specifically aimed at community groups including a specific equality focused event that was attended by over 130 representatives. The formal consultation on the Plan again included more targeted engagement with specific groups such as Gypsies and Travellers and Disabled Access Groups.
<u>Just Space Part 1 (2718)</u>	43.	Inclusion London, a disability group, specifically raised the lack of a detailed EqIA. The circular response they received was that the IIA Framework included an EqIA. Stonewall housing, which represents the interests of the LGBT+ community, raised the fact that the policies did not address LGBT housing aspirations and needs. The response states that those needs have been considered in line with the 2010 Act and that LGBT people are specifically	<ul style="list-style-type: none"> - See main cover note and appendix 3

Written Representation	ID	Comment	Response
		referenced within policies HC5 and HC7 which relate to cultural provision. Such a response evidences the shallowness of the IIA's analysis.	
<u>Just Space Part 2 - LGBTQ (2718)</u>	44.	IIA does not warrant recognition as an EqIA because it fails to show due consideration of the range of issues relevant to members of the LGBTQ+ population.	<ul style="list-style-type: none"> - The IIA identified a number of differential impacts relating to LGBTQ+ populations in the narrative. - Under the EqIA assessment, each policy appraisal identified the protected characteristics (including Sexual Orientation and Gender Reassignment) likely to be affected for every relevant objective. The narrative then refers to how specific groups would be impacted where the impact was considered differential. The objectives-led approach with guiding questions enabled the assessment to identify and describe the performance and effects of the Plan. - The reason for undertaken an IIA that incorporated EqIA was to combine the assessment into a single report to help identify cross-cutting impacts as part of an iterative approach. This integrated approach is common practice for local authority plan making and has been undertaken for the previous London Plans and other Mayoral Strategies.
<u>Just Space Part 2 - LGBTQ (2718)</u>	45.	<p>Disappointed not to be approached for consultation around the areas of concern raised</p> <p>Disappointed that concerns were not recognised as valid or deserving of consideration. Consider that the</p>	<ul style="list-style-type: none"> - A number of equalities organisations were involved in the development of the IIA Framework and consultation on the Scoping Report, this included Inclusion London, Equality and Human Rights Commission and Just Space which represents over 250 community organisations including some equality

Written Representation	ID	Comment	Response
		<p>experience of minority groups in engaging with the consultation on the plan reflects wider problems with the way that it speaks of inclusion while it fails to effect it.</p>	<p>groups such as Queer Spaces Network, Race of the Agenda, Age UK, etc).</p> <ul style="list-style-type: none"> - During the City for All Londoners Consultation, prior to the draft Plan, a number of workshops, including a specific equality and inclusion one, were held to discuss key issues that might inform the development of all strategies. In addition, a series of focus groups were held specifically targeting people who fell under protected characteristics, including LGBT. - As required by the GLA Act, the London Plan and the other Mayoral Strategies are required to be internally consistent with each other. Many of the policies within the London Plan overlap with other policies within the other strategies, eg Housing, Environment, Transport, Economic, Culture, etc. Therefore, any informal or formal engagement on the development of the Mayoral Strategies were fed back to all other strategy teams, including the London Plan – and discussions between relevant policy officers from each strategy took place where the engagement from one strategy influenced the policy of another – including in relation to equality issues. As part of the Mayor’s Equality and Inclusion Strategy engagement with equalities groups in summer 2017 identified key equality issues that may be relevant to many of the Mayoral Strategies, including the London Plan. - During the preparation of the Plan, a number of specific equalities groups including for example Gypsies and Travellers and the Disabled Access Panel were also informally consulted. - During the consultation on the draft London Plan itself, there were over 100 events, including two specifically aimed at community groups including a specific equality focused event that

Written Representation	ID	Comment	Response
			<p>was attended by over 130 representatives for each of the two events.</p> <ul style="list-style-type: none"> - The formal consultation on the Plan included more targeted engagement with specific groups such as Gypsies and Travellers and Disabled Access Groups. -
<p><u>Just Space Part 2 - LGBTQ (2718)</u></p>	<p>46.</p>	<p>Do not find it credible simply to assert (a typical example of many relates to S1 Social Infrastructure) that a given policy “supports the provision and enhancement of a range of community infrastructure types” to positive effect without any substantive reference to the real, complex and specific LGBTQ+ needs and aspirations around, for instance, social integration, health inequality, safety and security detailed in our prior submission.</p> <p>No evidence of engagement with such concerns, including potential negative consequences of proposed policies, around good growth, housing, heritage and the night-time economy (with the qualified exception of reference to public houses in HC7).</p>	<ul style="list-style-type: none"> - Please see appendix 3, which responds to the Panel’s request for brief summary of the specific implications of the Plan for each of the 9 protected characteristics.
<p><u>Just Space Part 2 - LGBTQ (2718)</u></p>	<p>47.</p>	<p>No reference to the real, complex and specific LGBTQ+ needs and aspirations.</p>	<ul style="list-style-type: none"> - It is recognised that not all people sharing a protected characteristic face the same (or any) disadvantage and that

Written Representation	ID	Comment	Response
		<p>These are unsatisfactorily subsumed under umbrella terms linking a range of characteristics, such as LGBT communities, BAME groups and young people. Such umbrella terms do not show any substantive engagement with the specific challenges facing such populations.</p> <p>No sense of engagement with how existing and proposed policies can disproportionately disadvantage, for instance, disabled queer, trans and intersex people of colour in ways relating to linked concerns around, for instance, housing, transport, safety and culture</p> <p>Reference to research conducted by the Urban Lab, which found that “<i>Equalities Impact Assessments in some key large-scale urban developments have failed to adequately protect clusters of LGBTQI+ venues, even where other forms of cultural heritage have been recognised.</i>”</p>	<p>where people share more than one protected characteristic, negative impacts may be compounded or mitigated through intersectional effects.</p> <ul style="list-style-type: none"> - The intention of using “umbrella terms” was not therefore to subsume characteristics but for ease of reference and is common practice. - Where there is evidence of distinct needs that are not common across people who share a protected characteristic, these are identified. For example, evidence relating to factors such as age and health have been differentiated by different racial groups, where there are important distinctions to be made, rather than being aggregated as BAME. - In relation to cultural venues, Policy HC5 and HC6 requires boroughs to “protect and support night time and other cultural venues” and to “recognise the importance of particular cultural venues to different groups such as the BAME and LGBTQ+ communities”.
<p><u>Just Space Part 3</u> <u>- Lucy Rogers</u> <u>(2718)</u></p>	<p>48.</p>	<p>H10 – For the three main topics, Equality and inclusion, Social integration and Health and health inequalities, the same text is used. The text is no more than a shorthand repeat of the policy and it fails to address any negative effects. The</p>	<ul style="list-style-type: none"> - The policy matrices summarised the findings of the EqIA by showing an overall assessment score against the IIA objectives, identifying which protected characteristics are likely to be impacted by a Policy and drawing out implications in the narrative text.

Written Representation	ID	Comment	Response
		wording is effectively geared towards housing units, not people.	<ul style="list-style-type: none"> - In response to the Panel’s request, appendix 3 provides a summary of the specific implications of the Plan for each of the 9 protected characteristics
<p><u>Just Space Part 3</u> <u>- Lucy Rogers</u> <u>(2718)</u></p>	49.	<p>H10 - The phrase “where possible to deliver an uplift in affordable housing” supposes that in some cases the policy will NOT deliver an uplift. Yet the impacts of this on vulnerable groups are not considered, among which are:</p> <ul style="list-style-type: none"> - the loss of people’s homes - the reduction in the chance for low income groups to access affordable homes - forced relocation leading to the break-up of communities - the particular effect on the elderly of relocation - the health effects of higher density housing, such as the effect on families of living in cramped conditions, inadequate light and access to green space <p>H10 - The assumption that the policy is “likely to promote a culture of equality” is a largely meaningless term, has no evidential basis and does not address the impact where the policy does NOT result in equality.</p>	<ul style="list-style-type: none"> - See Appendix 3 for discussion of H10. - Amendments to this policy were made in response to consultation responses and the matrices amended according - this is set out in the Addendum report.

Written Representation	ID	Comment	Response
		<p>H10 - Under Social integration where it is says that those with protected characteristics are more likely to be affected by displacement, there is no group-by-group analysis of this, just a sentence saying the policy will “mitigate the potential displacement”. It does not assess the mitigation methods and its relevance to each group.</p> <p>H10 - Under Social integration where it is says that those with protected characteristics are more likely to be affected by displacement, there is no group-by-group analysis of this, just</p>	
<p><u>Just Space Part 3</u> <u>- Lucy Rogers</u> <u>(2718)</u></p>	<p>50.</p>	<p>SD1- The assessments for this policy are wholly inadequate and comprise no more than shorthand repeats of the policy, cut and pasted into several boxes, often hastily written, which largely fail to identify any negative effects. The text does not give comfort that the policies were tested for Equality impact before they were written.</p>	<ul style="list-style-type: none"> - The Equalities Impact Assessment, as part of the Integrated Impact Assessment, has been carried with the intention of reducing discrimination, promoting equality of opportunity and fostering good relations. There is no legally prescribed format. Findings of the EqlA have influenced the development of policy as noted. - This is intended to be comprehensive but proportionate approach. - The IIA Report sought to simplify and reduce the length of the document by providing summary tables to convey information as effectively as possible with the narrative summary drawing out the key impacts.

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<p><u>Just Space Part 3</u> <u>- Lucy Rogers</u> <u>(2718)</u></p>	51.	<p>[SD1] As in all the matrixes there is no analysis of the impacts group-by-group, simply a Yes or No as to whether a group would be affected. Many of these are questionable.</p> <p>For example, why would the topics of Equality and inclusion, Health, and Social integration not be relevant to people in the ‘Pregnancy and maternity’ group? The clear impact of Opportunity Areas’ is that they will displace existing communities Because the Opportunity Area policy does not carry out Social Impact Assessments and because the Mayor has not evaluated the impact of OA designation in OAs to date, there is a clear lack of evidence that the policy will for example “reduce health inequalities and improve overall wellbeing” yet this is the conclusion of the Health topic.</p>	<p>- This is a drafting error for Pregnancy and Maternity for objectives 2 and 3.</p>
<p><u>Just Space Part 3</u> <u>- Lucy Rogers</u> <u>(2718)</u></p>	52.	<p>In topic 10 Economic competitiveness and employment there is no assessment of the loss of employment from wholesale redevelopment (as for example in Old Kent Road OA) and the fact that the types of employment that get pushed aside are those connected to protected groups: low income and BAME communities, in particular.</p>	<p>- Please see Appendix 3</p>

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<p><u>Just Space Part 3</u> <u>- Lucy Rogers</u> <u>(2718)</u></p>	<p>53.</p>	<p>D8 Tall Buildings How can it be possible that topics on health, culture and air quality are considered Not Applicable under this policy?</p> <p>Listed examples of impacts include:</p> <ul style="list-style-type: none"> - Loss of cultural and community space - Threat to established culturally-specific local areas - Reduction in air quality from construction pollution and congestion at ground level - Reduction in sunlight and green space <p>These Not Applicable boxes reveal the lack of a real Equalities impact</p>	<p>N/As were given for assessment of D8 against the IIA objectives mentioned for the following reasons:</p> <p>The issues raised by the respondent can be considered as relating to development in general, rather than tall buildings specifically.</p> <p><i>Objective 3: Health</i></p> <p>It is not clear that development of new tall buildings in particular would have specific implications for those who share protected characteristics. Moreover, the GLA's research on the impact of high density living found that there is no conclusive evidence as to the impact on the health and well-being of residents and that design and management of high-density buildings is much more important than height or density. It could be argued that a ? for health would more reflect the consideration that has been had of this issue.</p> <p><i>Objective 13: Culture</i></p> <p>An assessment of D8 (Tall buildings) against the above objective and prompt questions was considered not applicable because there is nothing inherent in the Policy that implies either provision or loss of cultural facilities, nor any inherent barrier to re-provision. Where specific development proposals for a tall building would entail the loss of a cultural facility, the requirements of Policy HC5 (Supporting London's cultural and creative industries) would apply, requiring Boroughs to protect existing cultural venues and it would be for planning authorities to weigh the various material considerations.</p> <p><i>Objective 14 Air Quality</i></p>

Written Representation	ID	Comment	Response
			<p>It was considered that there is nothing inherent in Policy D8 (Tall buildings) that would require assessment of its impact on equalities through a lens of air quality. Air Quality issues are picked up the SEA element of the IIA.</p>
<p><u>London Gypsies and Travellers (255)</u></p>	<p>54.</p>	<p>The Equality Impact Assessment of the IIA does not provide sufficient information on the expected impacts of each policy against each of the protected characteristics.</p> <p>The consideration of impacts on protected characteristics and low-income groups is reduced to a list showing Yes or No</p>	<p>- Please see appendix 3, which responds to the Panel's request for brief summary of the specific implications of the Plan for each of the 9 protected characteristics.</p>
<p><u>London Gypsies and Travellers (255)</u></p>	<p>55.</p>	<p>There is no clear justification of how the conclusion was reached other than the general statement that this was informed by the guide questions, specific evidence and 'professional judgment'.</p>	<p>The conclusions were reached based on the evidence gathered and professional judgement using the Objective framework, EqIA prompt questions. An indicative scoring system was established and is described in Section 7.2 of the IIA Report.</p> <p>- Please also see appendix 3, which responds to the Panel's request for brief summary of the specific implications of the Plan for each of the 9 protected characteristics.</p>

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<p><u>London Gypsies and Travellers (255)</u></p>	<p>56.</p>	<p>Across the various options for GG2, under Objective 1 the assignment of Y or N to the list of protected characteristics seems random. There is no indication why sexual orientation receives a No under GG2 Current London Plan and the GG2 Sustainable intensification, and a Yes under the other three options.</p>	<ul style="list-style-type: none"> - The assignment is not random, although there are two drafting errors, which will be corrected. <p>Relating to gender reassignment and sexual orientation:</p> <ul style="list-style-type: none"> - Options 1 and 2: identified as No because there are no defining characteristics of the option that give particular reason to expect differential impact, positive or negative depending on sexual orientation. - Option 3: Identified as Yes because of potential positive impacts: creating a more diverse and vibrant outer London places, offering a greater breadth of social and cultural infrastructure outside of Zone 1. Annual Population Surveys have demonstrated that LGBT populations are higher in central London. Therefore, this option may have particular benefit for LGBTQ+ communities that seek specialist or safe spaces or service, by providing greater critical mass to support their existence in outer London. - Option 4: this is a drafting error. - Option 5 is listed as Yes because of identified potential for negative impacts arising from the delivery of London’s housing needs outside of London. It is possible that those who face barriers to accessing housing (including LGBTQ* communities) might be forced to locate outside of London. This may have disproportionately negative impacts on those in the LGBTQ+ community who have actively sought London because of its perception as a relatively safe and welcoming city. <p>Relating to pregnancy & maternity: all options are identified as affected with the exception of Current London Plan. This is a drafting error.</p>

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<u>London Gypsies and Travellers (255)</u>	57.	It is extremely odd that for policies such as D6 Optimising housing density H1 increasing housing supply, H3 Monitoring housing targets there is no assessment at all against Objectives 1 and 2.	<ul style="list-style-type: none"> - For H1 this issue was picked up as part of the consultation and addressed in the addendum report. - For D6 is not considered that there is an inherent link between the approach to density and these objectives, however, these objectives were considered in relation to D1 and D2. - Policy H3 sets provides guidance considered necessary to explain how different housing types will be counted as part of contributing to the delivery of overall targets, it is not an exhaustive list of monitoring requirements. There was discussion at the EiP session about the potential of moving this guidance into supporting text.
<u>London Gypsies and Travellers (255)</u>	58.	Y/N approach continues to aggregate assumptions under the broad categories – leading the reader to think that all races and religions are affected in the same way.	<ul style="list-style-type: none"> - It is recognised that not all people sharing a protected characteristic face the same (or any) disadvantage and that where people share more than one protected characteristic negative impacts may be compounded or mitigated through intersectional effects. - While the supplementary EqIA matrices identifies Y/N under each protected characteristics – which is common and accepted practice – the narrative draws out specific distinctions within protected characteristics where appropriate. - Please also see appendix 3, which responds to the Panel’s request for brief summary of the specific implications of the Plan for each of the 9 protected characteristics.

Written Representation	ID	Comment	Response
<u>London Gypsies and Travellers (255)</u>	59.	No detailed justification of the assessment supported by evidence and references to the IIA baseline and other data in the boxes titled 'Summary against overall objective' for each of the policies	<ul style="list-style-type: none"> - The format of the matrices does not lend itself to extensive footnoting and cross-referencing. <p>Please see appendix 3, which responds to the Panel's request for brief summary of the specific implications of the Plan for each of the 9 protected characteristics.</p>
<u>London Gypsies and Travellers (255)</u>	60.	Narrative is largely copied across a number of the objectives which consists largely of assumptions and sweeping statements along the lines of "the policy will have x effect...this is particularly important for y, z etc groups."	<ul style="list-style-type: none"> - The 24 objectives were developed during the scoping process, which included an external workshop with statutory and non-statutory stakeholders. Two objectives covering equality and inclusion and social integration were included, alongside a number of equality guide questions under the other objectives. - The guiding questions within objectives 1 and 2 are the same, which has led to some repetition and overlap of the assessments under these objectives.
<u>London Gypsies and Travellers (255)</u>	61.	Within the GG2 Options, Gypsies and Travellers are mentioned in the summary assessment under objective 5 Housing supply, quality, choice and affordability as part of a list of groups that would potentially benefit from the assumed effects of the different scenarios. However, this is only for the option Polycentric approach and Current London Plan and Green Belt release, but not to the preferred option. There is no	<ul style="list-style-type: none"> - The Good Growth policies are overarching and contextual. The approach taken has been to flag whether there is anything inherent or distinctive about the Option, relative the other alternative options, that has the potential for positive or negative equalities impacts. - In this case, there were felt to be distinctive points to make for these two alternative spatial options relating to the provision for growth in outer London specifically and the potential to focus delivery of transport, social infrastructure and associated services in those locations, to the potential benefit of gypsies and

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		<p>explanation of how the different policy options would have different effects on groups</p>	<p>travellers who face disproportionate barriers to accessing employment and social infrastructure.</p> <ul style="list-style-type: none"> - This should also apply to Option 4 (Current London Plan plus City Region).
<p><u>London Gypsies and Travellers (255)</u></p>	<p>62.</p>	<p>Policies H1, H3 and D6 don't make any reference to the impacts of these policies on Gypsy and Traveller communities.</p> <p>Policies do not consider the tensions surrounding the high housing targets and appropriate provision of G&T sites.</p> <p>All the evidence available to the GLA and so many of the consultation responses from Local Authorities point out the significant tensions around the pressure to increase general housing supply and density and the provision of Traveller sites. The high housing targets, requirements to make 'best use of land' and deliverability concerns are quoted by many London Boroughs as barriers to making any provision for Gypsies and Travellers.</p>	<ul style="list-style-type: none"> - Gypsy and Traveller pitches count towards meeting the targets in H1. - The purpose of D6 is to optimise density and make the best use of land. The Policy seeks to 'optimise' rather than maximise density and the best use of land concept allows for different land use needs to be balanced based on a range of factors, including the needs of specific groups. This means the best use of land (and optimal density) for a particular site may be a Gypsy and Traveller site. - Policy H3 sets provides guidance considered necessary to explain how different housing types will be counted as part of contributing to the delivery of overall targets, it is not an exhaustive list of monitoring requirements. There was discussion at the EiP session about the potential of moving this guidance into supporting text.

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<p><u>London Gypsies and Travellers (255)</u></p>	<p>63.</p>	<p>Fragmented and simplistic analysis, with no reference to intersectionality or complex cumulative impacts of ‘headline’ policies on others that are more marginal.</p> <p>The obvious example for us is the inferior provision of H16 Gypsy and Traveller policy compared to H1 Increasing housing supply, in terms of the lack of targets, monitoring and strong direction to deliver this type of accommodation. In the EqlA table for H16 under objective 6 Sustainable land use, there is a hint to the possible tensions mentioned above: <i>‘Depending how these measures are implemented and managed, they could contribute to positive feelings about the local environment and while unlikely to result in high density development, the policy is suited to making better, more efficient and sustainable use of land’</i></p>	<ul style="list-style-type: none"> - The best use of land concept (GG2) allows for different land use needs to be balanced based on a range of factors, including the needs of specific groups. - Gypsy and Traveller pitches count towards meeting the targets in H1
<p><u>London Gypsies and Travellers (255)</u></p>	<p>64.</p>	<p>For H12 Housing mix under Objective 6 a potential negative impact is identified ‘for groups who are more likely to experience poverty and who are disproportionately impacted by overcrowding’ due to increasing density. As a minimum these issues should have been explored in the assessments of</p>	<ul style="list-style-type: none"> - New development does not inherently have disproportionate negative impacts on groups sharing protected characteristics The delivery of new homes, in particular new affordable homes, can have a positive impact for overcrowded households (see appendix 3), this can be facilitated by intensification.

Written Representation	ID	Comment	Response
		GG2 Sustainable intensification which makes an unsubstantiated generalisation that the policy would have a positive effect on all groups, and D6 Optimising housing density which is silent on the issue of equalities.	<ul style="list-style-type: none"> - The best use of land concept (GG2) and ‘optimising density’ allows for different land use needs to be balanced based on a range of factors, including the needs of specific groups.
<u>London Gypsies and Travellers (255)</u>	65.	Difficulty of reading and interpreting these assessments by the public, and in particular by groups protected under the Equalities act.	<ul style="list-style-type: none"> - In response to the Panel’s request, a brief summary of the specific implications of the Plan for each of the 9 protected characteristics is published alongside this document.
<u>Sharma, Meenakshi (1877)</u>	66.	Wholesale failure to analyse the policies’ equalities impacts in a rigorous manner as required	<ul style="list-style-type: none"> - In the matrices, the EqIA considered the impact on protected characteristic groups identified for each specific objective (‘Y’), and reference to specific receptors was drawn out in the narrative where the impact is considered differential and mitigation proposed as appropriate. The level of detailed of the original report was considered appropriate and proportionate. - Please also see appendix 3, which responds to the Panel’s request for brief summary of the specific implications of the Plan for each of the 9 protected characteristics.
<u>Sharma, Meenakshi (1877)</u>	67.	Sweeping statements are made in the EqIA about impacts but no evidence from the impact of the previous London Plan are used to support them. In fact, GLA officers were very open at the EIP on matter 15, that monitoring has been very sketchy and needed to be improved.	<ul style="list-style-type: none"> - Monitoring data collected during the previous London Plan was used to inform the baseline. - This supported the development of key sustainability issues, as set out in the IIA Scoping Report. These issues informed the assessment framework, forming the basis of the IIA objectives and key guiding questions.

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			<ul style="list-style-type: none"> - It was acknowledged that monitoring can always be improved and the GLA will be looking at improving this going forward.
<p><u>Sharma, Meenakshi (1877)</u></p>	68.	<p>Anecdotal many negative impacts are known about, throughout London, not least of which is the lack of really affordable housing for local people. This is totally ignored in the EqIA.</p>	<ul style="list-style-type: none"> - In response to the Panel's request, please see the brief summary of the specific implications of the Plan for each of the 9 protected characteristics is published alongside this document. - However, it should be noted that issues around the allocation of affordable to specific groups or people is outside the scope of the Plan.
<p><u>Sharma, Meenakshi (1877)</u></p>	69.	<p>Wishful thinking pervades the document, with words like: could, might, possible to indicate positive outcomes. The possible negative outcomes are either ignored or played down substantially and if identified, little thought is given to mitigating the negative effects.</p>	<p>It is the case that many of the assessments contained in the EqIA show the potential for positive equalities impacts across a broad range of protected characteristics and low income, because the Plan has the aim of reducing inequalities and promoting good growth at its heart. Many of the negative impacts have been mitigated in the original drafting of policies..</p> <ul style="list-style-type: none"> - In the context of the above, use of 'could', 'should', 'might', and 'possible' is considered appropriate, as often it is not emphatically known due to varying local circumstances and other external factors - Please also see appendix 3, which responds to the Panel's request for brief summary of the specific implications of the Plan for each of the 9 protected characteristics.
<p><u>Sharma, Meenakshi (1877)</u></p>	70.	<p>GG2 1 Equality and Inclusion Where is the evidence to show that the housing that is being provided is being accessed by poor BAME/religious groups? Isn't the opposite happening, with overcrowding being exacerbated</p>	<ul style="list-style-type: none"> - Policy GG2 Making the best use of land is part of the six core 'good growth' policies which represent the overarching objectives of the Plan. The policy outlines a commitment to the provision of high-quality housing alongside open space, and 50% green cover across London.

Written Representation	ID	Comment	Response
		<p>and people being displaced from where they been living and where they may have built up a community? Where is the evidence that the green and open spaces that are protected are located in areas where poorer people live? Isn't the opposite happening, with the green belt areas protected where there are much fewer poorer people and the Opportunity Areas approach targeting the more deprived areas, reducing the amount of all space available, including green space.</p>	<ul style="list-style-type: none"> - The narrative in the supplementary matrices does not identify whether or not specific groups will access this housing, but rather identifies that a greater supply of high-quality housing, and a greater mix of housing (including affordable homes and adaptable homes) will support a range of groups (including religious groups, ethnic minorities, those with disabilities) who are disproportionately affected by poor quality housing, overcrowding, deprivation, etc. The role of the EqIA is to consider how protected characteristics might be impacted by the policy, and it was considered that the provision of a greater housing mix would support a variety of protected characteristic groups. - The narrative in the supplementary matrices also references the provision of open space and 50% green cover. It does not make specific reference to the location of green and open spaces but rather highlights that, as an overarching policy for the delivery of infrastructure in London, new developments are required to include the provision of open spaces alongside housing.

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<p><u>Sharma, Meenakshi (1877)</u></p>	<p>71.</p>	<p>GG2 3 Health and Health inequalities Is this saying poor people will be able to travel to the outer green areas? People do not have time to do this. They need green spaces to be around them, which the policy of Opportunity Areas does not encourage.</p>	<ul style="list-style-type: none"> - The narrative in the matrices outlines that Policy GG2 Making the best use of land supports 50% of green cover across London and that new developments will ensure the provision of high-quality housing, in well-connected areas, with supporting infrastructure, including open spaces provided locally. - The policy therefore supports the provision of green cover and open spaces in new developments, which are associated with health benefits. - Specifically, in relation to OAs, Part B3 states that as part of OAPFs boroughs should plan for and provide the necessary social and other infrastructure to sustain growth, implicitly this include green spaces. This is further reinforced as the Plan is meant to be read as a whole, the protection and provision of green spaces is emphasized in policy GG2 D and policies G4 and G5.
<p><u>Sharma, Meenakshi (1877)</u></p>	<p>72.</p>	<p>GG2 5 Housing Although the current Plan would help to unlock growth, it leaves uncertainties in the long-term surrounding land capacity for the delivery of housing needs in the future.</p> <p>YES. Any insufficient provision of long-term housing would be likely to disproportionately impact equalities groups who are more vulnerable to overcrowding (especially BAME, some religious groups and disabled people and</p>	<ul style="list-style-type: none"> - Assume this comment relates to GG2 Option 1 as it refers to the current London Plan. It is agreed that the assertion in the comment is correct and the IIA Report reflect this.

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		<p>children), poor quality provision that does not accommodate complex needs (e.g. accessible lifetime homes, LGBT* specific housing), and homelessness. Many groups sharing protected characteristics and those on low incomes are more vulnerable to homelessness.</p>	
<p><u>Sharma, Meenakshi (1877)</u></p>	<p>73.</p>	<p>GG2 6 Sustainable Land Use BAME and low-income groups (particularly likely to live in social housing) may be disproportionately affected by disruption due to redevelopment. They are also most likely to benefit from additional and upgraded quality housing as a result of redevelopment. THIS IS SIMPLY NOT TRUE</p>	<p>- Please see appendix 3, which responds to the Panel's request for brief summary of the specific implications of the Plan for each of the 9 protected characteristics.</p>
<p><u>Sharma, Meenakshi (1877)</u></p>	<p>74.</p>	<p>Where is there any attempt to ensure the infrastructure required is adequately assessed and provided before the housing??</p>	<p>- The Plan must be read as a whole, the need for infrastructure is addressed in a number of places, in particular in chapters 5,9 and 11.</p>

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<p><u>Sharma, Meenakshi (1877)</u></p>	75.	<p>GG2 14 Air Quality High density growth does not stop people from owing cars. It just causes huge amounts of conflict about parking. There is a 30% increase in traffic congestion in the most deprived areas from the Redbridge Local Plan, while the more affluent areas will see an actual decrease.</p>	<ul style="list-style-type: none"> - Developments in well-connected areas (via public transport and active travel modes) can promote more sustainable forms of transport and lower levels of car ownership. The TfL report (December 2017) on Residential Car Parking, which formed part of the London Plan evidence base, sets out how high density growth can reduce car use, outlining that a high proportion of households in London do not own a car due to good transport links and those who use cars are more likely to live in less well-connected areas.
<p><u>Sharma, Meenakshi (1877)</u></p>	76.	<p>GG4 1 Equality and Inclusion Where is the analysis about the proportion of the different type of homes both in tenure and size that have been created in the last ten years? Where is the questioning of whether this Plan will continue on in the same vein.</p>	<ul style="list-style-type: none"> - The GLA publishes an Annual Monitoring Report each year. This provides a range of information, including details on the tenure and size (in terms of number of bedrooms) delivered each year. More detailed analysis can also be found in the Housing in London report.
<p><u>Sharma, Meenakshi (1877)</u></p>	77.	<p>GG4 Affordable Homes At least this would provide the homes that people need unlike the OA option.</p>	<ul style="list-style-type: none"> - Affordable housing is an important aspect of Policy GG4 Delivering the homes Londoners need. It commits to the delivery of the strategic target of 50 per cent of all new homes being genuinely affordable and outlines the issues London Housing Market faces in terms of affordable housing. - As set out in the IIA, the final Policy GG4 is a combination of the other options and includes commitments to delivering affordable homes in London.

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<u>Sharma, Meenakshi (1877)</u>	78.	GG6 Sustainable Land Use We have had market rate housing for the last ten years and we don't need any more. Where the analysis of what it has achieved for the most deprived?	<ul style="list-style-type: none"> - This comment is assumed to relate to GG4, Objective 6 Sustainable Land Use. - The SHMA provides information on housing needs and the AMR and Housing in London report provide analysis of previous delivery. - The London Plan has no remit over the allocation of affordable housing.
<u>Sharma, Meenakshi (1877)</u>	79.	CCG 4 7 Design Where is the evidence that this will provide the housing to meet London's needs? Where is the questioning of whether poor people will be able to access this housing? Where is the questioning of what high standards of design can be achieved in these high rise, high density buildings?	<ul style="list-style-type: none"> - Assuming CCG4 refers to GG4, Objective 7 Design - The Plan maximises the provision of affordable housing but the Plan does not have any control of the allocation of housing to specific people or groups. - Design policies in general (D2, D4,D6 and D8 in particular) require development proposals to optimise density, require particularly scrutiny of the quality of high density proposals, including setting minimum space standards and other qualitative factors.
<u>Sharma, Meenakshi (1877)</u>	80.	CCG4 9 Connectivity There is no questioning of whether the size of the units and affordability will be an issue regardless of connectivity.	<ul style="list-style-type: none"> - Assuming CCG4 refers to GG4. - The Plan is written to be read as a whole and therefore points have not been repeated across the Plan. - This objective is specifically concerned with whether GG4 will reduce severance and consequent inequalities for those groups who are more greatly affected by severance (e.g. people on low

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			<p>incomes, disabled people, children and young people, older people and people dependent on walking and using public transport for travel) and /or reduce the overall need for people to travel by improving their access to the services, jobs, leisure and amenities in the place in which they live.</p> <ul style="list-style-type: none"> - In relation to size of units and affordability, these issues are dealt with under objective 5 Housing Supply, Quality, Choice and Affordability. With the more specific impacts explored in the assessment for the relevant detailed policy within the Plan itself.
<p><u>Sharma, Meenakshi (1877)</u></p>	<p>81.</p>	<p>H1 Objective 5 Housing But transport capacity needs to be assessed properly unlike the assessment for the Elizabeth line.</p>	<ul style="list-style-type: none"> - The overall approach to transport capacity and whether it can sustain the pattern of growth set out in GG2 and the quantum of growth set out in GG4 is evidenced in the Strategic Transport modelling (NLP/TR/002). The assessment is undertaken on the basis this evidence is robust.
<p><u>Sharma, Meenakshi (1877)</u></p>	<p>82.</p>	<p>H1 6 Sustainable Land Use high-density development and delivery of minimum space standards could impact negatively on and potentially exacerbate issues for groups who are more likely to experience poverty and who are disproportionately impacted by overcrowding. So, what should be done about this?</p>	<ul style="list-style-type: none"> - The findings of the GLA research highlight the importance of the design and management of development to mitigate potential negative impacts. - It is therefore considered that a strong steer on design guidance (including ensuring all new homes meet minimum standards), design review panels for high density development will help mitigate potential negative impacts. - Please also see appendix 3, which responds to the Panel's request for brief summary of the specific implications of the Plan

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			for each of the 9 protected characteristics and discusses overcrowding.
<u>Sharma, Meenakshi (1877)</u>	83.	H1 9 Connectivity There is a strong emphasis on promoting high density, mixed-use development in areas of high PTAL, to reduce the overall need to travel and improve access to services, such as offices and retail. This assumes that the poor will be working in offices and retail – most are not.	- The assessment scores positively for development in high PTAL areas as it will help to ensure that developments will be well-connected, increasing access to opportunities, services and social networks. Offices and retail are just two examples of the many opportunities and services individuals could access in well-connected area. This aspect of the assessment is focusing on the overall assurance that new developments will be widely connected to improve access for all groups.
<u>Sharma, Meenakshi (1877)</u>	84.	H1 Economic competitiveness, H1 Objective 7 Design, GG2 Objective 11 Infrastructure, GG2 10 Economic Competitive Where is the monitoring proposed to ensure this happens?	- The implementation of the Plan will be monitored through the AMR (including the KPI and contextual indicators), drawing on monitoring of the other Mayoral strategies and through specific research studies as and when required.

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<p><u>Sharma, Meenakshi (1877)</u></p>	<p>85.</p>	<p>H1 14 Air Quality Just because an area has high PTAL it does not mean it has spare capacity. Current transport usage should be monitored. Where is the recommendation that air quality levels should be used to help decide where more development is located to ensure inequality in air quality does not rise further.</p>	<ul style="list-style-type: none"> - H1 requires boroughs to optimise the potential for housing delivery on all suitable and available brownfield sites, especially with existing or planned PTAL of 3-6. - The Plan must be read as a whole. Certain policy objectives were not repeated throughout, if addressed adequately in other policies within the Plan. Air quality and development issues are covered in Policy SI1 Air Quality which sets out a requirement to ensure that new developments do not lead to a deterioration in existing air quality and that they make provision to address local problems of air quality. - In addition, capacity of the transport network and usage is routinely monitored by TfL.
<p><u>Trust for London (1296)</u></p>	<p>86.</p>	<p>Accept that an assessment has been made of the impact on individual policies on groups with protected characteristics; acknowledge iterative process; believe that the IIA had some impact on the development of the draft New London Plan; however, maintain that the quality of the assessment of the equalities impact in the IIA documents provided is poor and could be improved.</p> <p>Such limited detail on the impact on individual equalities groups. For example, the impact on all BAME groups is reduced to a single '+' or 'Y'. This implies that all impact on all BAME groups is the same.</p>	<ul style="list-style-type: none"> - The Equalities Impact Assessment, as part of the Integrated Impact Assessment, has been carried with the intention of reducing discrimination, promoting equality of opportunity and fostering good relations. There is no legally prescribed format. Findings of the EqlA have influenced the development of policy as noted. - This is intended to be comprehensive but proportionate approach. - The IIA Report sought to simplify and reduce the length of the document by providing summary tables to convey information as effectively as possible with the narrative summary drawing out the key impacts.

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		<p>The volume of extraneous detail detracts from being able to engage with the assessment.</p>	
<p><u>Trust for London (1296)</u></p>	<p>87.</p>	<p>The only place in the key housing policies where the needs of LGBT communities are considered is under 'supported and specialised accommodation'. This is despite there being a known increased likelihood of LGBT people being in housing need and potentially reduced likelihood of meeting thresholds for statutory homelessness assistance.</p> <p>The only reference to LGBT housing need is the 'Y/N' field on sexuality (which is mostly registered as a 'N'. This implies that the housing needs of LGBT people have only been considered as relevant where they qualify for supported accommodation.</p>	<p>- Please see appendix 3</p>

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<u>Trust for London (1296)</u>	88.	The assessments contain a lot of pro forma text in the qualitative 'summary against overall objective' columns. Implies a process of box ticking and copying and pasting rather than thoughtful delivery of a mandated legal process to protect and ensure consideration of the real and differentiated housing needs of protected groups in London.	<ul style="list-style-type: none"> - The IIA assessment was undertaken using an objective-led approach. Each policy was reviewed and a commentary provided against the appropriate objectives, using supporting guiding questions to address specific issues. Recommendations were provided where adverse effects were identified to avoid or reduce the magnitude of effects. In every policy appraisal, the assessment also considered each of the nine protected characteristic and identified where each group was likely to be specifically impacted by the policy, in relation to the objectives. - The 24 objectives were developing during the scoping process, which included an external workshop with statutory and non-statutory stakeholders. Two objectives covering equality, inclusion and social integration were included, alongside a number of equality guide questions under the other objectives. - The guiding questions within these objectives are the same, which is recognised to have led to some repetition and overlap of these assessments where the impact of the policy on Equalities and Inclusion (Objective 1) and Social Integration (Objective 2) were considered to be the same.
<u>Trust for London (1296)</u>	89.	Page 6 of the 'Supplementary Information' report refers to the baseline evidence on equalities. This evidence base is crucial, yet not referenced, so it is impossible to check its comprehensiveness or sufficiency. We would appreciate a reference or bibliography for this evidence base, and its publication if it is not already publicly available.	<ul style="list-style-type: none"> - As set out in the supplementary information, the EqIA was based on a large amount of information including, but not limited to, the IIA baseline set out in the Scoping Report, consultation input and the professional experience and judgement of the assessment team. - The other Mayoral Strategies were also developed alongside the draft London Plan, with many common policies within both the Plan and the other strategies. The GLA have a common

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			evidence base upon which to draw upon for the various IIAs of the Mayoral Strategies.
<u>Trust for London (1296)</u>	90.	Concerned that the information published in support of the IIA does not sufficiently assist those with protected characteristics to participate in public life.	<ul style="list-style-type: none"> - The purpose of an integrated approach to the assessment has been to identify cross-cutting impacts as part of an iterative process. The approach is common practice for local authority plan making and has been undertaken for the previous London Plans and other Mayoral Strategies. - The IIA Report sought to simplify and reduce the length of the report by providing summary tables and colour-coded matrices to convey the impact of the policies on the objectives in a more proportionate way. A non-technical summary was also published at the beginning of the IIA document to summarise the findings of the impact assessment in an accessible format.
<u>Trust for London (1296)</u>	91.	People must be able to quickly and transparently understand the impacts of key policies on them. We therefore ask again that the Deputy Mayor commit to producing a plain English summary of the Plan, as well as a more detailed assessment of the impact of policies on different equalities groups.	<ul style="list-style-type: none"> - In response to the Panel's request, a brief summary of the specific implications of the Plan for each of the 9 protected characteristics is published alongside this document.

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	92.		<p>Summarising the impacts per protected characteristic has highlighted that for some specific protected characteristics there was an N marked against a specific protected characteristic when the analysis and narrative in the IIA demonstrated it should have been a Y. The table below sets out where this is the case.</p> <p>However, it should be noted that the potential relevant impacts were picked up in the related narratives – which informed the policy development, including any proposed mitigations.</p> <table border="1" data-bbox="1149 667 2056 1048"> <thead> <tr> <th data-bbox="1149 667 1279 703">Policy</th> <th data-bbox="1279 667 1525 703">IIA Objective</th> <th data-bbox="1525 667 2056 703">PC</th> </tr> </thead> <tbody> <tr> <td data-bbox="1149 703 1279 778">D2</td> <td data-bbox="1279 703 1525 778">1, 2</td> <td data-bbox="1525 703 2056 778">Gender Reassignment, Religion, Sexual Orientation</td> </tr> <tr> <td data-bbox="1149 778 1279 815">S1</td> <td data-bbox="1279 778 1525 815">7</td> <td data-bbox="1525 778 2056 815">Gender Reassignment</td> </tr> <tr> <td data-bbox="1149 815 1279 852">G1</td> <td data-bbox="1279 815 1525 852">14</td> <td data-bbox="1525 815 2056 852">Race</td> </tr> <tr> <td data-bbox="1149 852 1279 888">G4</td> <td data-bbox="1279 852 1525 888">1, 3, 8</td> <td data-bbox="1525 852 2056 888">Race</td> </tr> <tr> <td data-bbox="1149 888 1279 925">SI1</td> <td data-bbox="1279 888 1525 925">3, 14</td> <td data-bbox="1525 888 2056 925">Disability, Race</td> </tr> <tr> <td data-bbox="1149 925 1279 962">SI2</td> <td data-bbox="1279 925 1525 962">1, 3</td> <td data-bbox="1525 925 2056 962">Disability, Race</td> </tr> <tr> <td data-bbox="1149 962 1279 999">T2</td> <td data-bbox="1279 962 1525 999">1,2</td> <td data-bbox="1525 962 2056 999">Pregnancy</td> </tr> <tr> <td data-bbox="1149 999 1279 1048">T2</td> <td data-bbox="1279 999 1525 1048">3</td> <td data-bbox="1525 999 2056 1048">Race</td> </tr> </tbody> </table>	Policy	IIA Objective	PC	D2	1, 2	Gender Reassignment, Religion, Sexual Orientation	S1	7	Gender Reassignment	G1	14	Race	G4	1, 3, 8	Race	SI1	3, 14	Disability, Race	SI2	1, 3	Disability, Race	T2	1,2	Pregnancy	T2	3	Race
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