

M2. Does the Integrated Impact Assessment and Addendum Report (NLP/CD/04 & 05) indicate that the Plan will help to advance equality of opportunity between people who share a “protected characteristic” as defined in the Equality Act 2010¹ and those that do not share it and further the other two aims of the Act? In particular, which policies of the Plan will achieve this?

- 2.1 The IIA and Addendum Report concludes that the preferred strategic options for Good Growth, identified as being priorities for the Mayor, will help to advance equality of opportunity for groups who share protected characteristics. These preferred options scored positively against relevant equalities assessment criteria and will ensure that the long-term growth strategy will sufficiently accommodate the needs of groups who share protected characteristics.
- 2.2 The IIA report also shows that the majority of draft London Plan policies directly affecting communities scored positively against equalities assessment criteria and will help to advance equality of opportunity. This was particularly true for policies relating to housing, design, social infrastructure, economy, green infrastructure and natural environment, and transport. The particular policies which will achieve this are discussed at the end of this response.
- 2.3 The Equalities Impact Assessment (EqIA) is used to ensure that equality issues are fully considered as part of the decision-making process, including the potential effects arising from the design and implementation of a proposed plan, policy, or project. Section 1.1.2 of the IIA sets out the approach to assessing equalities impacts in line with the Equality Act (2010)³. The Equality Act imposes a duty on public bodies to have due regard to the need to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act. The EqIA process seeks to advance equality of opportunity between persons who share protected characteristics in line with the Equality Act, including age, sex, race, disability, religion, sexual orientation, marriage/civil partnership, and gender reassignment.
- 2.4 Although low-income groups are not identified within the protected characteristics under the Equality Act, in line with good practice they have formed part of the EqIA assessment, as people experiencing low-income and/or high deprivation typically overlap with other protected characteristics and impacts on these people are relevant to achieving inclusive growth.
- 2.5 In line with the Equality Act, the EqIA process has had regard to the need to:
- remove or minimise disadvantages suffered by people who share a protected characteristic that are connected to that characteristic;
 - take steps to meet the needs of people who share a protected characteristic that are different from the needs of people who do not have that characteristic;
 - encourage people who share a protected characteristic to participate in public life or in any other activity in which their participation is disproportionately low;
 - foster good relations between persons who share a relevant protected characteristic and persons who do not;
 - tackle prejudice; and
 - promote understanding.

¹ “Protected characteristics” are age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

- 2.6 Section 1.1.2 of the IIA Report sets out the process for undertaking the EqIA assessment. As set out in Table 16, the IIA Framework used key guiding questions to assess the policies against a range of equalities criteria. The assessment criteria's strong focus on accessibility, adaptability, and safety ensured that the IIA process considered the need to tackle prejudice and promote understanding of the needs of all groups. The breadth of the guiding questions also addressed the other two aims of the Equality Act – eliminating harassment and victimisation, and fostering good relations between people who share protected characteristics and those who do not, specifically through tackling prejudice and promoting understanding.
- 2.7 As previously stated, the IIA and Addendum Report shows that the majority of policies relating to, or that are likely to impact, communities across London, will help to advance equality of opportunity. Particular examples of policies demonstrating this are considered in further detail below.
- 2.8 The draft spatial development patterns policies, notably SD6 Town Centres and High Streets², SD7 Town Centres Development Principles and Local Plans³, and SD10 Strategic and Local Regeneration, help to promote access to amenities and services, supporting social integration and strong communities as well as removing barriers to social and economic opportunities and improving overall life chances. Table 51 (Policy SD6⁴), Table 53 (Policy SD7⁵) and Table 55 (Policy SD10) within the IIA report show that these policies performed strongly against the majority of equalities assessment criteria considered applicable for the relevant policy. Supporting social integration and removing the barriers to social and economic opportunities will particularly support advancing equality of opportunity for lower-income communities, disabled people, older people and young people, as well as helping to foster good relations between persons who share a protected characteristic and those who do not.
- 2.9 The draft design policies promote inclusive design, to ensure all communities can safely, easily and independently access opportunities and services. Notably, Policies D3 Inclusive Design, D5 Accessible Housing and D7 Public Realm will help to ensure that buildings and spaces respond to a range of needs in a way that is dignified and barrier-free and which encourages independence. This goes beyond physical mobility, to ensure that the built environment remains navigable for those with a range of physical and sensory needs. Table 58 (Policy D3), Table 60 (Policy D5) and Table 62 (Policy D7) within the IIA report show that these policies performed strongly against the majority of equalities assessment criteria considered applicable for the relevant policy. Inclusive design, safety and independence will particularly support equality of opportunity for people with a disability or long-term health condition, older people, children and pregnant women as well as for people of different faiths/religion.
- 2.10 The draft transport policies promote inclusive access across all transport modes. A range of equalities considerations have been promoted through the IIA process, including having regard to safety for those travelling at night, improving the health and wellbeing of people walking, and ensuring appropriate provision of affordable travel options, such as walking and cycling. The transport policies support safe public transport services and interchange throughout the day and night, which can particularly support residents undertaking shift work, including night shifts. This type

² MSC 2.77

³ MSC 2.98

⁴ MSC 2.77

⁵ MSC 2.98

of working pattern can disproportionately be undertaken by low-income communities, and forms part of the wider equalities assessment. Notably, Policies T2 Healthy Streets, T5 Cycling, and T6.5 Non-residential Disabled Parking play a strong role in supporting the needs of those with protected characteristics. Table 139 (Policy T2), Table 142 (Policy T5) and Table 148 (Policy T6.5) within the IIA report show that these policies performed strongly against the majority of equalities assessment criteria considered applicable for the relevant policy. Improving the quality of the street environment will encourage active travel and support the improved health and wellbeing of people walking. This will particularly support equality of opportunity for those with an existing health condition or disability, young children and pregnant women. The provision of adequate and inclusive cycling infrastructure will support improved access and safety for communities across London, including those with a range of physical needs. Appropriate disabled car parking provision will also help to provide some equalities groups with a sense of security and independence.

- 2.11 The draft social infrastructure policies support the shared and integrated use of services across all communities in London. This supports the ability of those who share protected characteristics to participate in public life and to access services and opportunities to the same extent as those who do not. These policies, notably S1 Developing London’s Social Infrastructure, S6 Public Toilets, and S5 Sports and Recreation Facilities, encourage an inclusive environment wherein all groups can access the services they need, whilst supporting social integration and strong communities. Table 139 (Policy T2), Table 143 (Policy T6) and Table 148 (Policy T6.5) within the IIA report show that these policies performed strongly against the majority of equalities assessment criteria considered applicable for the relevant policy. The social infrastructure policies more broadly were identified as particularly advancing equality of opportunity for lower-income communities, women, ethnic minority groups, those with an existing health condition or disability, religious groups, and LGBTQ communities as well as eliminating harassment and victimisation, and fostering good relations.
- 2.12 The draft housing policies support the sufficient provision of high-quality adaptable and accessible units, to ensure London’s housing stock meets a range of needs. Notably, Policies H5 Affordable Housing, H10 Redeveloping existing housing and estate regeneration, H15 Specialist Older Persons Housing and H16 Gypsies and Travellers Accommodation ensure a range of housing types are available, with affordable and adaptable options to respond to a range of individual needs. Table 73 (Policy H5), Table 78 (Policy H10) Table 83 (Policy H15) and Table 84 (Policy H16) within the IIA report show that these policies performed strongly against the majority of equalities assessment criteria considered applicable for the relevant policy. The housing policies more broadly were identified as particularly advancing equality of opportunity for lower-income communities, residents with an existing health condition or disability, older people and young people, as well as helping to overcome discrimination and marginalisation, eliminating harassment and victimisation, and fostering good relations.
- 2.13 The draft green infrastructure and natural environment policies support the sufficient provision of high-quality and accessible open space. Notably, Policies G1 Green Infrastructure, G4 Open Space, G5 Urban Greening and G8 Food Growing allow for the support and enhancement of green and open spaces and so promote positive health and wellbeing outcomes, which can disproportionately benefit groups who share protected characteristics. Table 112 (Policy G1), Table 115 (Policy G4), Table 116 (Policy G5) and Table 119 (Policy G8) within the IIA report show that these policies

performed strongly against the majority of equalities assessment criteria considered applicable for the relevant policies. The provision of appropriate, accessible and high-quality green infrastructure will advance equality of opportunity for lower-income communities, residents with an existing health condition or disability, children and pregnant women, as well as helping to foster good relations.

- 2.14 The draft economic policies support inclusive growth by ensuring the provision of the right type of employment floorspace in the right locations, including the provision of affordable workspace which can support a range of employment opportunities. Notably, Policies E3 Affordable Workspace, E9 Retail, markets and hot food takeaways and E11 Skills and Opportunities for all, support vibrant high streets, promote skills and training opportunities, and ensure the provision of affordable office and work space, helping to overcome both actual and perceived barriers to access to employment. Table 96 (Policy E3), Table 102 (Policy E9) and Table 104 (Policy E11) within the IIA report show that these policies performed strongly against the majority of equalities assessment criteria considered applicable for the relevant policy. The economic policies were identified as particularly advancing equality of opportunity for lower-income communities, ethnic minority groups and women. The creation of a healthy food environment, reducing barriers to employment and ensuring a diverse retail and market offer can also improve health and wellbeing outcomes, which can be particularly important for those who have an existing or long-term health condition or disability.
- 2.15 On the basis of the above, it can be concluded that the London Plan will help to advance equality of opportunity between people who share a protected characteristic and those who do not, eliminate harassment and victimisation and foster good relations.