

GLA - PLANNING FOR LONDON: Equalities Issues

JUST SPACE RESPONSE 31/12/23

Just Space is a Londonwide network of community groups focused on planning issues. The response below is drawn from a variety of comments made, and is not exhaustive or definitive. A more comprehensive set of proposals is set out in our [Community-Led Plan](#) and [Recovery Plan](#)

Summary

Just Space and many of its component groups urge the GLA London Plan team to ensure that the full and consultative analysis of equality impacts is central to the planning process from the outset, for two distinct reasons

- (i) The evolution of London society in recent years, amplified by the experience of the Covid pandemic (see our [Recovery plan](#)), have brought issues of inequality to an unprecedented level and the next plan must take every opportunity to identify and reverse or mitigate the many mechanisms which reproduce inequalities and generate unfair impacts.
- (ii) The Equality Act 2010 places specific duties, including the Public Sector Equality Duty (PSED), on the Mayor and these must be fully discharged.

Key recommendations to the London Plan team 2024

1. Just Space calls upon the Mayor and team to put equality considerations at the heart of the plan-making process, starting with careful analysis of the distinctive needs and demands of the very many intersecting groups of Londoners protected by law. This analysis needs to be both developed in dialogue with those in the groups concerned (not experts claiming to represent them) and drawing on available academic, GLA and other research.
2. This equality analysis needs to start now so that it can inform the evolution of policies and alternative strategies **from the outset**.
3. We shall be deliberating with our member organisations but provisionally propose that the strategic choices needing investigation now for London should be an updated set of our 2017 proposals, i.e.
 - a. Strong policies to minimise building demolition, especially of social housing;
 - b. Strong emphasis on suburban bus and orbital rail improvements in preference to long-haul commuter routes, notably CR2.
 - c. implementation of Lifetime neighbourhood / Lifetime suburb concept to improve quality of life and reduce the need to travel
 - d. pursuit of a very selective approach to "growth", further elaborating the "good growth" concept in recognition of the environmental damage associated with many kinds of growth and the house/land price (and thus inequality) impacts of the growth strategies pursued since 2000.
 - e. A re-focusing of housing policy on maximising the stock of low-rent social housing instead of maximising total housing numbers.

Equality issues in the 2021 London Plan

Just Space was pleased to be consulted as part of the Scoping exercise for the various impact appraisals which the GLA intended to combine in an Integrated Impact Appraisal (IIA). Discussions were, however, frustrating with unresolved disagreements on many issues, notably

- IIA too late to be able to influence plan and policies as they crystallised
- IIA not adequately grounded in research with and about each protected group
- study of strategic alternatives failed to evaluate community priorities.

When the [IIA was published](#) alongside the draft Plan for consultation Just Space [commented in its response](#) that the IIA was considered not fit for purpose for a whole list of reasons. In particular we argued that key choices facing London were ducked or evaluated inadequately:

- inclusion / exclusion of extensive council estate demolition (biased analysis)
- emphasis on increased radial transport capacity (CR2 etc) versus improved suburban bus and orbital rail investment
- implementation / deletion of Lifetime neighbourhood / Lifetime suburb concept to improve quality of life and reduce the need to travel
- pursuit of a substantially lower population growth trajectory as part of a national re-balancing and/or a reduction in net in-migration associated with Brexit.

In the subsequent Examination in Public (EiP) Just Space and many other organisations were vociferous in criticising the Equality Assessment and persuaded the Panel of inspectors to secure the publication by the Mayor of detailed workings which had been averaged out or generalised in the IIA. These additional data duly appeared but were judged by Just Space and others to be inadequate. The Panel were persuaded to [call for further new material](#), notably to ***“Provide brief separate outlines of the specific implications of the Plan (both positive and negative) for each of the 9 groups with protected characteristics.”*** Such a report was later [produced](#) and Just Space [commented](#) **“On a first inspection, this is a fascinating essay on the diversity of needs among Londoners. If it had existed 3 years ago the preparation of the London Plan would have been hugely enriched.** It doesn’t deal explicitly with the social class dimension (because the government decided not to implement that segment of the Equalities Act) but class / income / wealth variables do figure strongly where that’s the available data or where there are strong overlaps between poverty and group experience of deprivation.”

The panel decided not to allow any further discussion of the issues and accepted the IIA.
[End]

JS Comments on the GLA Scoping Report on IIA March 2017

<https://justspacelondon.files.wordpress.com/2017/03/london-plan-ii-a-scoping-report-comments-by-just-space-march-2017.pdf>

JS meeting with GLA and Arup 2 August 2017 on IIA

<https://justspacelondon.files.wordpress.com/2015/07/js-lp-ii-a-meeting-20170802.pdf>