

# Report

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**Report for** – Greater London Authority  
London Environment Strategy  
Integrated Impact Assessment: Equality Impact Assessment (EqIA) Report

Final (revised)

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## 1.0 Introduction

### 1.1 Overview of the London Environment Strategy (LES)

The Greater London Authority Act 1999 required the Mayor to produce environmental strategies covering biodiversity, air quality, climate change mitigation & energy, climate change adaptation, municipal waste and ambient noise. Previously, these strategies were published separately between 2002 and 2011. Further strategies on business waste and water were also published in 2011. The 1999 Act was amended by the Localism Act 2011, which now requires the Mayor to consolidate the previous environmental strategies into a single 'London Environment Strategy'. This strategy must include the issues covered by the existing statutory and non-statutory strategies, and any other matter relating to the environment in Greater London.

The Mayor's Environment Strategy aims to help solve environmental challenges through an integrated, systems approach to policy-making. This is intended to result in larger environmental improvements at lower cost (and without reducing Londoners' living standards) than looking at environmental issues in isolation.

The main environmental priorities for Londoners are identified as:

- Improving air quality;
- Increasing biodiversity;
- Protection of and improved access to greenspace;
- Reduction in ambient noise;
- Reducing the risk of flooding;
- Improving water quality;
- Reducing the urban heat island effect;
- Reducing waste generation and disposal;
- Reducing global greenhouse gas emissions;
- Efficient use of energy and increase in energy from renewable sources; and
- Efficient use of water.

The draft LES for consultation sets out that the Mayor wants London's environment to be as good as or even better than the countryside that surrounds it. He wants it to be:

- **Greener:** All Londoners should be able to enjoy the very best parks, trees and wildlife. Creating a greener city is good for everyone – it will improve people's health and quality of life, support the success of businesses and attract more visitors to London.
- **Cleaner:** Londoners want their city to be clean, attractive and healthy – living in a big city does not mean they should accept a dirty and polluted environment. The Mayor will clean up London's air, water and energy in a way that is fair, protects the health of Londoners, and contributes to the fight against climate change.

- **Ready for the future:** Water, energy and raw materials for the products we consume will be less readily available in the future, and climate change will mean higher temperatures, more intense rainfall and water shortages. The Mayor will make sure the city does not waste valuable resources, is prepared for the future and is safeguarded for future generations.

This document uses four strategic approaches to make the most of environmental opportunities now and in the future. They inform every aspect of the strategy, providing links between each of them to reinforce the holistic approach that must be taken to tackle London's environmental challenges. They also provide links between this and the Mayor's other strategies, to ensure that environmental concerns are factored into decision making across London. They are:

- low carbon circular economy
- smart digital city
- green infrastructure and natural capital accounting
- the Healthy Streets Approach

To achieve this vision, this strategy sets out detailed policies and proposals that will, cumulatively and over time, result in the necessary improvements to London's environment. These issues have been covered within the draft LES for consultation in relation to seven broad Policy Areas:

- Green infrastructure;
- Air quality;
- Ambient noise;
- Adapting to climate change;
- Waste;
- Climate change mitigation and Energy; and
- Making the transition to a low carbon, circular economy.

This EQIA report assesses an additional Policy Area – 'Water'. Just prior to the publication of the draft LES for consultation this Policy Area was incorporated into the Adapting to Climate Change Policy Area. In this process none of the policies or proposals were changed and as such the standalone assessment of this Policy Area remains unchanged.

The overarching aims related to each policy area are:

- **Green Infrastructure** - London will be a National Park City where more than half of its area is green; where the natural environment is protected and the network of green infrastructure is managed to benefit all Londoners.
- **Air Quality** - London will have the best air quality of any major world city by 2050, going beyond the legal requirements to protect human health and minimise inequalities.
- **Ambient Noise** - Improve the quality of life of Londoners by reducing the number of people adversely affected by noise and promoting more quiet spaces.
- **Adapting Climate Change** - London and Londoners are resilient to severe weather and longer-term climate change impacts. This will include flooding, heat risk and drought.

- **Waste** - London will be a zero waste city so that by 2026 no biodegradable or recyclable waste will be sent to landfill and by 2030 65 per cent of its municipal waste will be recycled.
- **Climate Change Mitigation and Energy** - London will be a zero carbon city by 2050, with energy efficient buildings, clean transport and clean energy.
- **Transition to a Low Carbon Circular Economy** - Enable the transition to a low carbon circular economy.

## 1.2 Purpose of this report

This report details the methodology and findings of an Equality Impact Assessment (EqIA) of the draft London Environment Strategy for consultation.

The GLA has “general public body duties” under equality legislation and statutory duties to promote equality arising from the Equality Act 2010. The Mayor and the Greater London Authority (GLA) also have an additional duty to promote equality of opportunity arising from the GLA Act 1999 (as amended).

The purpose of undertaking an EqIA is to help ensure the strategy does not discriminate against any individual or community and to promote equality for all, where possible. The EqIA identifies the potential impacts and any disproportionate effects on equality as a result of the implemented strategy and reports committed mitigation measures to reduce negative impacts and increase benefits to maximise positive equality outcomes.

Under the 2010 Act, the GLA’s duties apply to people with protected characteristics as the grounds upon which discrimination is unlawful. The protected characteristics are age; disability; gender; gender reassignment; marriage and civil partnership; pregnancy and maternity; race/ethnicity/ nationality; religion/belief; and sexual orientation. The duty requires the GLA in exercising its functions to have due regard to (summarised):

- Eliminating unlawful discrimination, harassment and victimisation and any other conduct which is unlawful under the Act.
- Advancing equality of opportunity between people who share a protected characteristic, and those who don’t have that characteristic. This means in particular:
  - Removing or minimising disadvantages suffered by people who share a protected characteristic that are connected to that characteristic.
  - Taking steps to meet the needs of people who share a protected characteristic that are different from the needs of people who don’t have that characteristic.
  - Encouraging people who share a protected characteristic to participate in public life or in any other activity in which their participation is disproportionately low.
- Fostering good relations between people who share a protected characteristic, and those who don’t have that characteristic. This means, in particular:
  - Tackling prejudice.
  - Promoting understanding.

EqIAs are required to fulfil the statutory duties of public bodies by ensuring that equality is promoted in accordance with the Equality Act 2010, and seeks to ensure that equality issues are

fully considered as part of the decision-making process. Compliance with these duties may involve treating some persons more favourably than others. The 2010 Act identifies a number of groups of people with protected characteristics, as follows:

- **Age:** A person of a particular age or persons of a particular range of ages, i.e. children (0-4); younger people (aged 18-24); older people (aged 60 and over);
- **Disability:** A person with physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities, i.e. disabled people;
- **Gender reassignment:** A person in the process of transitioning from one gender to another;
- **Marriage & civil partnership:** A person in a civil partnership or marriage between same sex or opposite sex (considered not applicable to LES IIA in the Scoping Report<sup>1</sup>);
- **Pregnancy & maternity:** A person who is pregnant or expecting a baby and a person who has recently given birth;
- **Race:** A person defined by their race, colour and nationality (including citizenship) ethnic or national origins, i.e. Black, Asian and minority ethnic (BAME) groups;
- **Religion & belief:** A person with religious and philosophical beliefs including lack of belief;
- **Sex:** A man or a woman, recognising that women are more frequently disadvantaged; and
- **Sexual orientation:** A person's sexual orientation towards persons of the same sex, persons of the opposite sex or persons of either sex.

In addition to the protected characteristics identified under the Equality Act 2010, the GLA also considers people on lower income groups as part of its assessment of equality impacts, to ensure that the needs of Londoners on lower incomes are considered in policy and plan making.

An effective EqIA assists in achieving a more cohesive relationship and increased transparency between policy makers and Londoners. It means that equality issues are considered in policy development, contributing to better access, safety, security and health, as well as promoting greater equality of opportunity and assisting in improving quality of life for residents and communities in line with legislation and policies.

### **1.3 Report Structure**

The method for completing the EqIA has been defined by three key steps:

- **Scoping and defining** – the assessment area is defined, and equality groups that may be impacted by the scheme are identified, along with the equality determinants most relevant for each group;
- **Information gathering** – socio-demographic profiling is undertaken and scheme proposals and consultation findings are summarised to provide a knowledge base for the analysis; and

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<sup>1</sup> Mayor of London (2017) - **Integrated Impact Assessment of the Mayor's London Environment Strategy: Integrated Impact Assessment (IIA) Scoping Report** - Greater London Authority, January 2017.

- Assessment and action planning – potential impacts during implementation of the strategy are identified, and findings from other assessments pulled together to determine the scale of impact on specific at risk groups. Mitigation measures are suggested, where necessary.

The outcomes of each step are reported within the following sections of this EqIA report:

- Section 2: Scoping and Defining the EqIA;
- Section 3: Information Gathering; and
- Section 4: Assessment and Action Planning.

The overall conclusions of the assessment are summarised in Section 5: EqIA Conclusions and Review.

## 2.0 Scoping and defining

### 2.1 Introduction

The scope of the IIA overall was set out by the GLA in the IIA Scoping Report<sup>2</sup>. This section draws upon this material to define the scope of the EqIA by identifying equality determinants and how they relate to protected characteristics and people on low incomes (hereafter referred to as 'equality groups'), and defining the geographical areas that will be affected.

This first stage of the EqIA considered the equality groups for their relevance in relation to the strategy, by identifying how each equality group may be affected, based on professional judgement and widely available evidence on the issues faced by equality groups.

The assessment area was then defined, so that the relevant socio-demographic baseline data for the area can be reported.

Next, a range of issues (equality determinants) that may arise as a result of the strategy for each group were identified. The equality determinants were categorised in relation to the environmental Policy Areas addressed in the draft LES for consultation.

Each equality group is considered in terms of how they may be impacted by the strategy, on the basis of professional judgement and published evidence on the issues they face in terms of specific vulnerabilities, inequality or risks. These issues (equality determinants) that may affect these groups as a result of the strategy also are identified for the eight policy areas.

**Table 2.1** sets out the equality determinants in relation to the London Environment Strategy for each of the equality groups

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<sup>2</sup> Mayor of London (2017) - **Ibid.**

**Table 2.1 Relevance of draft LES for consultation Policy Areas to the EqIA**

Equality Group	Relevant LES Policy Areas	Considerations
Age	Green infrastructure Air quality Ambient noise Adapting to climate change Waste Energy and climate change mitigation Water Making the transition to a low carbon, circular economy	<p>Responses to environmental issues differ between age groups. This assessment focuses on those most at risk to changes, i.e. children under 16 and older people over 65. Children are particularly at risk from air pollution because of the potential effects on their developing respiratory systems. Opportunities for better access to green spaces is important for children to help combat childhood obesity and benefit their wellbeing generally, particularly in respect of outdoor play which is crucial to psychological development. They also are prone to loss of concentration as a result of noise and this may also affect sleep patterns. They also are more sensitive to extreme weather conditions.</p> <p>Older people similarly are particularly sensitive to health risks associated with poor air quality, often exacerbating existing respiratory conditions. Older people also are at risk from extreme weather conditions, and information on such events needs specifically to consider the needs of this group in terms of access to information, new technologies, which are significantly lower than the population at large, and increasing overlap with the needs of disabled people.</p> <p>Large family households (with lots of children) require more water than other households; the affordability of this water should be a consideration.</p>
Disability	Green infrastructure Air quality Ambient noise Adapting to climate change waste Energy and climate change mitigation Water	<p>The nature of people’s disabilities will result in different responses to environmental change. People with physical disabilities that impair their respiratory performance or with existing respiratory illnesses are particularly sensitive to poor air quality. Disabled people may experience poor access to green spaces due to difficulties with, for example, physical access to the transport system, understanding public transport information if visually or hearing impaired, perceived safety issues, and a lack of confidence using transport services. People with particular physical or mental health conditions may be more sensitive to noise, particularly where they are housebound or institutionalised. The Disability Equality Duty in the Disability Discrimination Act (DDA) continues to apply under the 2010 Act. Under this, disabled people have rights of access to information in formats accessible to them. The provision of accessible information (i.e. in large font text, Braille), will be particularly important considerations. Policies for climate change mitigation and the implications for energy costs are particular concerns for some disabled people, both in terms of their health needs and affordability.</p> <p>The management of some disabilities requires above averaged usage of water; the affordability of this water should be a consideration.</p>
Marriage and civil partnership	None	Considered not relevant to the IIA of the LES in the GLA Scoping Report.

Equality Group	Relevant LES Policy Areas	Considerations
Pregnancy and maternity	Green infrastructure Air quality Ambient noise Adapting to climate change Waste Energy and climate change mitigation Water	<p>Pregnant women and mothers may be affected by temporary disability whilst pregnant. Also, due to greater time spent at home during the working day undertaking caring duties can result in disproportionate impacts of some environmental effects such as noise and vibration. They may also be more sensitive to extreme weather events.</p>
Ethnicity and/or nationality	Green infrastructure Air quality Ambient noise Adapting to climate change Waste Energy and climate change mitigation Water Making the transition to a low carbon, circular economy	<p>The needs and impacts felt by different ethnic groups vary significantly, although there are few specific differences in physical responses to environmental change. However, exposure to poor environmental conditions is much higher among the BAME population, for example being exposed to concentrations of PM10 (particulates) over 28% higher on average than the urban white population<sup>3</sup>, due to the concentration of these populations in the most polluted urban environments. Access to green space may be important to different degrees in specific cultural or religious contexts. Several factors interact to prevent black and minority ethnic groups from having the same access to greenspace as other groups, including economic factors; lack of awareness, familiarity, knowledge, confidence or interest; cultural attitudes and preferences; feeling unwelcome and out of place. The loss of quantity or quality of greenspaces may have particular implications for the Gypsy and Traveller communities as their lifestyles, in general, means that they are more dependent on the use of outdoor space which is usually part of the natural environment. Personal safety and security issues are a specific concern for this group due to the perceived threat of racist attacks or hate crime. BAME groups and immigrants may experience difficulties in accessing information if English is not their first language.</p> <p>A transitional economy can provide opportunities to address race and minority equality issues in the workplace, as new working practices often associated with this can help overcome disadvantage and discrimination.</p>

<sup>3</sup> UK Notification to the European Commission to extend the compliance deadline for meeting PM<sub>10</sub> limit values in ambient air to 2011: Racial Equality Impact Assessment (England) - August 2009.

Equality Group	Relevant LES Policy Areas	Considerations
Faith	Green infrastructure Ambient noise Adapting to climate change Water	The religion/faith of an individual may impact on their needs and access requirements. This may include accessing a number of different religious establishments or specialist food stores on different days of the week and times of day. In addition, actual or perceived safety relating to prevalence of hate crimes in an area can be an issue for this group. Some faith groups have specific travel requirements, e.g. the need to walk to places of worship rather than use motorised travel modes. Places of worship may also be particularly sensitive receptors for noise impacts. Some religious observances (e.g. fasting) may make members of specific faith groups more sensitive to extreme weather events. Water has a spiritual dimension, and often has significance for particular faith groups and may be important in certain observances.
Gender	Green infrastructure Making the transition to a low carbon, circular economy	The different issues, barriers and priorities for women and men may include ensuring both men and women have the same access to greenspace, and considering safety and security issues. A transitional economy can provide a means to address gender inequality in the workplace.
Sexual orientation	Green infrastructure	Issues relating to this group may include safety and security issues due to hate crimes.
Gender reassignment	Green infrastructure	Issues relating to this group may include safety and security issues due to hate crimes.
Londoners on lower incomes	Green Air quality Ambient noise Adapting to climate change Waste Energy and climate change mitigation Water Making the transition to a low carbon, circular economy	Research has indicated that people on low incomes can be disproportionately exposed to environmental effects such as poor air quality and excessive noise levels depending on where they live and work. They are also more likely to live where outdoor space is less available and they are therefore more dependent on public open spaces. As a result, people with low incomes are more concerned about anti-social behaviour in public and greenspaces than the average Londoner. Deprived communities are generally more exposed to flood risk, with up to 8 times more people on lower incomes living in tidal floodplains than the least deprived people. They are also less likely to have access to the internet or use a smartphone <sup>4</sup> , making it harder to obtain information regarding expected extreme weather events. People on low incomes can be disproportionately exposed to the environmental effects of waste handling and disposal depending on where they live and work. Policies for climate change mitigation, and the implications for energy costs are a particular concern.  Making the transition to a low carbon, circular economy will provide new jobs. Some of these could be taken up by people on lower incomes and may provide opportunities for skills development and higher earning.

<sup>4</sup> Latest data from Ofcom indicates that 19% of adults do not have access to fixed or mobile broadband, and 29% do not own a smartphone.

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## 2.2 Equality determinants

A range of potential equality issues (“Equality Determinants”) in relation to the draft LES for consultation, and taking account of regulatory and policy requirements, have been identified in line with those reported in the IIA Scoping Report. **Table 2.2** following sets out the equality determinants relevant to the draft LES for consultation and the key themes identified within it.

**Table 2.2: Equality Determinants**

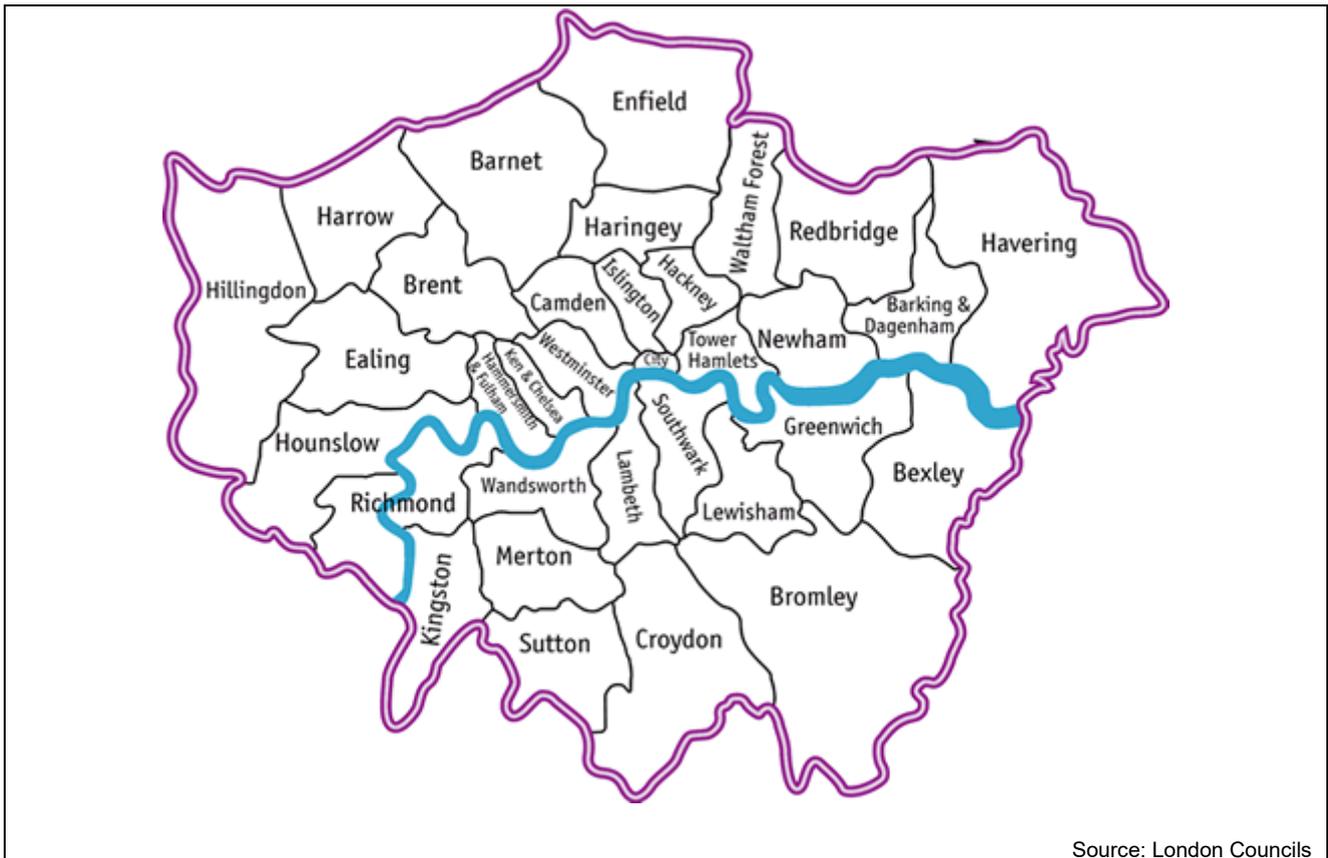
Theme	Determinant	Equality Groups								
		Age	Disability	Pregnancy/ maternity	Race/ ethnicity/ nationality	Faith	Gender	Sexual Orientation	Gender reassignment	Low Income
Green Infrastructure	Make nature closer and more accessible to people, particularly in most urbanised parts of the city.	✓	✓	✓	✓	✓				✓
	Encouraging establishment of a green infrastructure network that increases opportunities for informal recreation, walking and cycling.	✓	✓							✓
	Promoting, educating and raising awareness of the benefits of natural capital and the natural environment for all Londoners.	✓	✓		✓	✓	✓	✓	✓	✓
	Promoting improved accessibility for all within existing historic / cultural/ archaeological environments and their landscapes through inclusive design and management.	✓	✓		✓	✓	✓	✓	✓	✓
	Enabling all Londoners to benefit from clean air and green spaces.	✓	✓	✓	✓	✓	✓	✓	✓	✓
	Promoting an inclusive and sustainable design and construction approach ensuring a barrier free environment for all.	✓	✓	✓	✓	✓	✓	✓	✓	✓
	Encouraging improved design, construction and management of the built environment, open space and green spaces to create inclusive public realm.	✓	✓	✓	✓	✓	✓	✓	✓	✓
Air Quality	Exposure to high concentrations of small particulates (PM <sub>10</sub> and PM <sub>2.5</sub> ) leading to increased mortality or morbidity due to cardiovascular and respiratory disease, and cancers.	✓	✓	✓	✓					✓
	Exposure to high concentrations of nitrogen dioxide (NO <sub>2</sub> ) leading to increased symptoms of bronchitis in asthmatic children and reduced lung function generally.	✓	✓	✓	✓					✓
	Language services relating to information on poor air quality.				✓					
Ambient Noise	Exposure to high levels of noise, leading to nuisance, stress, sleep disturbance etc.	✓	✓	✓	✓	✓				✓
Adapting to Climate Change	Reduce impacts in flood risk areas / heat hotspots / drought risk areas	✓	✓	✓	✓					✓
Waste	Promoting access to secure, reliable recycling facilities irrespective of borough or type of property in which people live.	✓	✓		✓					✓

Theme	Determinant	Equality Groups								
		Age	Disability	Pregnancy/ maternity	Race/ ethnicity/ nationality	Faith	Gender	Sexual Orientation	Gender reassignment	Low Income
	Maximising use of innovative waste management techniques including smart technology.	✓	✓		✓					✓
	Facilitating sustainable waste transport, reducing CO <sub>2</sub> and air pollutant emissions.	✓	✓	✓	✓					✓
Energy and Climate change mitigation	Reducing energy bills.	✓	✓		✓					✓
	Promoting and Improving water and energy efficiency.	✓	✓		✓					✓
	Providing a smart and affordable energy system.	✓	✓	✓	✓					✓
	reducing greenhouse gas emissions and moving towards a zero carbon London by 2050	✓	✓	✓						✓
Water	Efficient secure and affordable water supply	✓	✓	✓	✓	✓				✓
	Providing better access to water and adjacent areas for recreational uses	✓	✓	✓	✓	✓				✓
Transition to a Low carbon circular economy	Changes in the demand for, and supply of, low carbon and environmental goods	✓			✓		✓			✓

### 2.3 Defining the assessment area

The spatial scope for the EqlA is the Greater London Authority area. The EqlA also takes account of potential impacts on adjoining areas as appropriate. **Figure 2.1** following shows a map of the Greater London Authority area.

**Figure 2.1: Greater London Authority Area and constituent London Boroughs**



The Strategy itself includes policies that cover the period up to 2050. This is therefore also the timeframe for the EqlA.

## 3.0 Information gathering

### 3.1 Socio-demographic profiling

#### 3.1.1 Overview

London is a diverse capital city, and as the city has grown in recent years following several decades of decline, the diversity of Londoners has also changed. This makes the consideration of the effects of policies on different equality groups ever more important. Key characteristics of London in this respect are that:

- The BAME population has grown and now makes up over 42 per cent of Londoners<sup>5</sup>. Six London boroughs (Newham, Brent, Harrow, Redbridge, Tower Hamlets and Hounslow) have populations where the majority of residents are from a BAME background.
- There has also been an increase in faith diversity, with many different religious days and festivals of worship being observed in the capital.
- The population in London is also younger compared with the UK generally, particularly among BAME Londoners.
- There are almost two million Londoners holding non-UK passports. Poland, followed by Ireland and India are the top non-UK passports held by Londoners.
- Due to changing lifestyles and advances in medicine people are living longer. Londoners born between 2010 and 2012 can expect to live almost a decade longer than those born between 1991 and 1993. This means the numbers of older people are growing, even though the proportion they represent in the population overall is declining.
- The official statistics do not tell the whole story. Groups such as Gypsies and Travellers or illegal immigrants will suffer discrimination disproportionate to their numbers, which are not documented comprehensively or robustly.

Within the context of the strategy, the GLA defines 'Inclusion' as the ability of people to feel able to / want to benefit from London's environment<sup>6</sup>. As noted above, London is hugely diverse, and this diversity is expected to increase with the growing population to comprise a greater mix of people of all races and ages. A sense of inclusion amongst certain groups will change over time having regard to changes in the population. This is also driven by changes in legislation over time, e.g. the decriminalisation of male homosexuality in the 1960s and more recent legalisation of gay marriage.

#### 3.1.2 Age

In the 2011 census, 3% of London's population were aged 89 and over, while Londoners aged 65 and over made up 11% of the population. People aged 65 and over are more likely to be:

- women (56% of older Londoners are women vs. 51% of all Londoners)
- from a white ethnic group (78% of older Londoners are white vs. 60% of all Londoners);

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<sup>5</sup> GLA Intelligence (2015) 2015 Round Ethnic Group Population Projections.

<sup>6</sup> Mayor of London (2017) – **Ibid** – Paragraph 5.3.1, pp.63.

- on an annual household income of less than £20,000 per year (66% of older Londoners live in a lower income household vs. 37% of all Londoners); and
- be disabled (36% of older Londoners are disabled vs. 10% of all Londoners).

The proportion of older Londoners is set to grow in future, the GLA estimates by 2040 15% of London's population will be aged 65 or over.

The highest proportions of older residents live in outer London boroughs, particularly Havering, Bromley, Bexley, Sutton and Harrow. Conversely, the lowest proportions live in the central boroughs to the east (i.e. Tower Hamlets, Newham, Hackney, Lambeth and Southwark). This will have implications for way in which communications are undertaken as part of the implementation of the LES, bearing in mind that older people are less likely to be familiar with or use digital platforms.

Similarly, in 2011, Londoners aged under 25 made up 32% of the population. 20% were aged 15 or under, and 12% were aged between 16 and 24. Within this younger age group (under 25) the proportion of boys/men and girls/women were practically equal (49% girls/women). Younger Londoners are more likely to be from a BAME group (54% 0 to 15-year-olds; 48% of 16- to 24-year-olds). Also, while 10% of all Londoners define themselves as disabled, only 3% aged under 25 do so.

About half of Londoners aged between 16 and 24 are students, and are more likely to live in households with a lower income (41% live in a household with an income less than £20,000 compared to 37% of all Londoners).

The highest proportion of younger Londoners live in boroughs in east London (i.e. Newham, Barking and Dagenham, Tower Hamlets), while the lowest proportions live in central boroughs (i.e. the City, Kensington and Chelsea, Westminster).

### **3.1.3 Disability**

The 2011 Census indicated 14% of Londoners report a long-term health problem or disability that limits their day-to-day activities, and has lasted (or is expected to last) at least 12 months. Other data from Transport for London<sup>7</sup> also indicates 10% of Londoners consider that they have a long-term physical or mental disability or health issue that limits their daily activities or the work they can do (including issues due to old age). Of this group, 19% have a serious long-term illness and 10% have a mental health condition. It should be noted, however, that many disabled people experience multiple impairments. Other characteristics of disabled Londoners include:

- 55% are women, compared to 50% of non-disabled Londoners;
- 46% are aged 65 or over compared to 9% of non-disabled Londoners;
- 67% are white, compared to 62% of non-disabled Londoners;
- 84% are retired or not working compared with 26% of non-disabled Londoners; and
- 41% have a household income of less than £10,000 compared with 15% of non-disabled Londoners.

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<sup>7</sup> Transport for London (2013) - **London Travel Demand Survey 2012/13**.

### 3.1.4 Race, ethnicity and nationality

Specifically, the BAME population of Greater London is projected to increase from 3.31 million in 2011 to 4.88 million in 2041, an increase of 1.57 million (47.5 per cent) over the period<sup>8</sup>. The Greater London BAME population is not projected to reach a majority at any time over the projection period (by 2041 the White proportion is projected to be 53 per cent and the BAME 47 per cent). However, by 2036 12 London boroughs are projected to have BAME majority populations, three in Inner London (Newham, Tower Hamlets, and Lewisham) and nine in Outer London (Brent, Harrow, Redbridge, Ealing, Hounslow, Barking and Dagenham, Croydon, Waltham Forest, and Hillingdon).

In 2015, 77.4% of Londoners were UK nationals, compared with over 90% for England as a whole<sup>9</sup>. The largest groups of other nationals resident in London were from Poland (2.1% of London's population), India, Romania, Italy, Ireland, France and Portugal. No other groups comprise more than 1% of London's population. The highest proportion of foreign nationals (33.1%) lived in Brent, while the lowest proportion (7.3%) was in Havering.

A key element of ethnicity and nationality is language, and this is crucial to the implementation of the LES, given its focus on communications and information. The 2011 Census indicated that overall, more than 100 languages are spoken in 30 of the capital's 33 boroughs. Only the City of London, Richmond and Havering fall below this. An increasing diversity of languages are spoken in London, and there are 53 languages that are spoken by at least 0.1 per cent of residents. There are a further 54 that are variants of established languages such as Chinese or those, such as Caribbean Creole, Cornish or Gaelic, spoken by a small number of people. The most common other language is Polish, spoken by nearly 2% of residents, followed by Bengali, Gujarati, French, Urdu and Arabic. The most diverse borough is Hillingdon, where all 107 languages defined by the Census are spoken, followed by Newham, where 104 languages are spoken. Also in Newham, 41% of the population does not have English as their main language and 9% of people are unable to speak English at all.

Particular consideration needs to be given to the requirements of, and effects of policy on, the Gypsy and Traveller community. Although the overall number of people within the community is likely to be relatively small, there is little accurate or reliable information available on this. The needs of this group are routinely ignored or underemphasised in public policy, and an historical lack of site provision, insecurity, isolation and discrimination has severely affected the health and well-being and opportunities for education and employment experienced by this community<sup>10</sup>. Without adequate accommodation options to support the culture and tradition of Gypsy and Traveller communities, inequality and exclusion will not be adequately addressed. For example, Accommodation Needs Assessments as the main source of evidence for Local Plans, often significantly underestimate actual need. One large-scale epidemiological study indicates that Travellers have significantly poorer health status than non-Travellers<sup>11</sup>. Many health problems are between twice and five times more prevalent among this community. In spite of these greater health needs, Gypsies and Travellers used fewer health and related services, often due to

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<sup>8</sup> GLA Intelligence (Nov 2015) 2014 Round Ethnic Group Population Projections.

<sup>9</sup> ONS (2015) Population of the UK by Country of Birth and Nationality: 2015.

<sup>10</sup> London Gypsy and Traveller Unit (2016) - **Planning for the Accommodation Needs of Gypsies and Travellers in London** – p. 1, p.3.

<sup>11</sup> Parry, G. et al. (2004) - **The Health Status of Gypsies and Travellers in England** – Department of Health Inequalities in Health Research Initiative, Project 121/7500 October 2004 University of Sheffield School of Health and Related Research.

reluctance of GPs to register Travellers or visit sites. This is compounded by the added effects of environmental hardship, social exclusion and cultural attitudes.

It should also be noted that there are likely to be significant numbers of illegal immigrants to the UK living in London, whose presence is unrecorded by official statistics. In 2009, the London School of Economics estimated the illegal immigrant population in the capital at of 442,000<sup>12</sup>.

### 3.1.5 Gender, pregnancy and maternity

As in the rest of England and the UK, in 2011 51% of Londoners were women. There was little variation across the London boroughs in terms of the split between women and men, only the City of London, Newham and Tower Hamlets diverge from this average across the Capital (45% of City of London residents and 48% of Newham and Tower Hamlets residents are women).

The key differences between women and men relate to employment status and household income. 39% of women did not work or were retired in 2011, with a further 13% in part-time employment. This compares with figures of 25% and 6% respectively for men. Women are also more likely to be the primary carer of children at home.

The conception rate in London was 84.4 per 1,000 women in 2015. This is higher than the average for England which is 78.6. Across London, This ranges from a low of 59.5 per 1,000 in Camden to a high of 117.7 per 1,000 in Barking and Dagenham. The rate tends to be markedly higher in outer London compared with inner London. However, the level of underage pregnancies has fallen right across London in the last decade, to 4.8 per 1,000 conceptions. This is lower than the rest of England (5.5 per 1,000). The underage conception rate fell in 30 of London's 32 boroughs. The number of boroughs with a higher underage conception rate than the England average has halved to 10 boroughs. The largest decrease was in Lambeth, although this still has the highest rate of any London borough at almost 4 times higher than Harrow, which has the lowest rate<sup>13</sup>.

Race and ethnicity is also a factor in maternity. ONS figures indicate that infant mortality rates among the Pakistani and Caribbean communities are more than double those for white British women. Other studies<sup>14</sup> have indicated that the risk of dying in pregnancy for black women is seven times higher than for their white, British-born counterparts. Travellers and newly-arrived refugees have also been observed to be at significantly increased risk.

### 3.1.6 Sexual orientation and gender reassignment

**Table 3.9** following sets out the recorded information available<sup>15</sup> at the Greater London and UK levels:

**Table 3.1: Representation of LGBT (%)**

LGBT	Greater London	UK
Heterosexual	89.9	93.5

<sup>12</sup> Gordon, I. et al (2009) - **Economic Impact on the London and UK Economy of an Earned Regularisation of Irregular Migrants to the UK** – Greater London Authority, p.7.

<sup>13</sup> Data from Office of National Statistics.

<sup>14</sup> Ameh, C.A. and Van den Broek, N (2008) - **Increased Risk of Maternal Death Among Ethnic Minority Women in the UK** – The Obstetrician and Gynaecologist, Volume 10, Issue 3, July 2008, pp. 177–182.

<sup>15</sup> Office for National Statistics (2012) - **Integrated Household Survey**.

LGBT	Greater London	UK
Lesbian/gay/bisexual	2.5	1.5
Other	0.4	0.3
Don't know/refusal/non-response	7.2	4.7

No reliable data on the number of transgender people at local or national level are currently available. However, the EqIA has considered representation of this group within the assessment to ensure any likely impacts arising as a result of the LES are taken into account.

### 3.1.7 Religion and belief

In 2015 49% of London's population were Christian. 15% were Muslim, 5% Hindu and 2% Jewish. 25% of Londoners said they had no religion.

Bexley was the London Borough with the highest proportion of Christian residents (68%), while Tower Hamlets was the lowest (29%), but also had the highest proportion of Muslim residents (46%). The highest proportion of Hindus was in Harrow (26%) and of Jews was in Hackney (10%).

### 3.1.8 Londoners on Lower Incomes

Hackney, Islington and Westminster are within two per cent of the most deprived areas in England. Falling within the most deprived five per cent of areas are also parts of Haringey, Tower Hamlets, Croydon, Brent, Newham, Kensington & Chelsea, Barking & Dagenham, Enfield, Croydon, Lewisham, Waltham Forest, Lambeth and Ealing. The City and Richmond are the only local authority areas within London with no areas in the most deprived 20 per cent of England (Figure 5.13).

However, it should be noted that there are significant variations in income levels within the area of each borough. This assessment is focussed on London-wide effects and the major spatial variations in this. Nevertheless, there will be specific adverse and positive effects of the LES experienced at a much more local spatial level, and account should be given to this in the implementation of the Strategy.

## 3.2 Consultation

Paragraph 8.2 of the GLA's scoping report<sup>16</sup> notes that while formal consultation with statutory consultees must be undertaken in conformity with SEA/IIA practice, ongoing engagement will also be undertaken throughout the duration of the IIA. The report indicated that this will take place both through scheduled meetings and events with stakeholders but also through ongoing communication.

Paragraph 1.3 of the scoping report also indicates that the GLA and TfL held a workshop with stakeholders on 14 June 2016 to identify key issues and consider a consistent set of IIA objectives which could apply to all relevant Mayoral strategies. This directly informed the IIA objectives used in the assessment. Regulation 4 of the SEA Regulations 2004 defines certain organisations

<sup>16</sup> Mayor of London (2017) – Ibid.

consultation bodies. In England the statutory consultation bodies are Historic England, Natural England and the Environment Agency.

It is understood that the Scoping Report was provided to the three statutory consultees as well other stakeholders for a period of five weeks. Specifically in relation to equality issues, the stakeholders consulted included:

- The Equality and Human Rights Commission;
- Inclusion London;
- The British Youth Council; and
- Race on the Agenda.

Equality related issues raised by consultees in response to the scoping report included:

- The existing housing stock contributes to a significant proportion of emissions in the city. Home energy inefficiency contributes to fuel poverty as well as to excess emissions. Retrofitting existing homes to a higher energy efficiency standard is a key strategy for emission reduction. (Just Space)
- The strategy should support the concept of 'good growth' which includes the principle of ensuring neighbourhoods remain 'liveable' as the population of London grows. There is a need to assess the safeguarding of settled low income and at risk residents in neighbourhoods that score well by these measures of liveability and/or experience 'good growth' who otherwise would be displaced by regeneration/development. (Just Space)
- Equalities impacts are under-represented in the IIA Scoping Report. For the IIA to be effective, all of the stated components of assessment should be given appropriately adequate weight in order that the objectives and guiding questions are properly devised. Many of the objectives and guiding questions are too vague, ambiguous or do not adequately consider the issues at hand to enable effective specific and measurable assessment of any proposed policies/strategies. (Just Space)

Following the review of consultation responses received the IIA guide questions were reviewed and amended to better reflect the scope of the strategy and ensure that all assessments were addressed. The final set of assessment guide questions is provided in the full IIA report.

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## 4.0 Assessment and Action Planning (Mitigation)

### 4.1 Assessment

In this section, the likely impacts of the strategy are considered in the light of the baseline data described in **Section 3** above to provide an assessment of its effects on the various equality groups as set out in **Table 4.1** on the following pages.

The EqIA recognises that the impacts of the strategy will be experienced by all sections of the population living and working in the areas within Greater London and beyond that are affected by the strategy. However, the requirements of the EqIA focus only on the equality groups identified in the Equality Act 2010, and people on low incomes, as identified in **Section 1.2** above.

### 4.2 Action Planning (Mitigation)

Action planning in this context means the development of measures to mitigate and/or manage any identified discriminatory effects of the proposed scheme, so that these can be avoided or reduced to acceptable levels. Also, this provides an opportunity to identify positive effects of the scheme, so that these can be actively promoted. These actions are identified in the 'Approach and Mitigation' column in **Table 4.1** following.

**Table 4.1: EqIA Summary Table**

Policy Area	Potential Impact	Equality Groups Affected	Proportionality	Impact (+ / -)	Recommendations for Mitigation or Enhancement
Green Infrastructure	<p>There is potential for this Policy Area to have a positive impact on access to green infrastructure. Urban greening will help to enhance resilience during extreme weather events such as heat waves, by providing cooling and shading, and flooding by contributing to sustainable urban drainage.</p> <p>Measures to design out crime, better use and consequent improvements in natural surveillance will provide benefits for a number of equality groups who may be 'at risk' of crime.</p>	Older Londoners	Proportionate	+	N/A
		Children and younger people	Disproportionate	+	
		Disabled people	Disproportionate	+	
		Pregnant women and parents	Disproportionate	+	
		People from BAME groups	Disproportionate	+	
		Faith groups	Proportionate	+	
		Women, people identifying as LGBT	Proportionate	+	
		Londoners on lower incomes	Disproportionate	+	
Air quality	<p>Nitrogen oxides (NO and NO<sub>2</sub>) can inflame the lung lining and reduce immunity to lung infections. It has been correlated with reduced lung function. Particulate matter (PM<sub>10</sub>) can settle deep in the lungs and can exacerbate heart and lung disease. Poor air quality can have more severe effects on very old and young people, in particular those with respiratory ailments such as asthma. Children are also likely to be</p>	Older Londoners	Disproportionate	++	Consider auditing other sites used by at risk groups such as outdoor play areas, care homes and hospitals in addition to schools
		Children and younger people	Disproportionate	++	

Policy Area	Potential Impact	Equality Groups Affected	Proportionality	Impact (+ / -)	Recommendations for Mitigation or Enhancement
	<p>differentially affected due to the correlation of poor air quality and increased prevalence of physical and mental development issues, including lung growth. Air pollution also tends to be highest in deprived areas of London where there are also tend to be higher levels of groups with some protected characteristics, for example, people from BAME groups.</p> <p>The LES sets out ambitious targets to reduce emissions including through increased share of journeys by more sustainable modes of transport and a transition to cleaner vehicles. Proposals for a schools 'audit programme will be designed to help boroughs identify actions that can be taken to reduce exposure.</p>	Londoners on low incomes	Disproportionate	+	
		People from BAME groups.	Disproportionate	+	
Ambient noise	<p>Nuisance at night can lead to an increase in medical visits and spending on sleeping pills, which affects families' budgets and expenditure on health initiatives. Chronic exposure to aircraft noise can:</p> <ul style="list-style-type: none"> <li>• harm cognitive performance;</li> <li>• be associated with impaired well-being and motivation; and</li> <li>• affect blood pressure and catecholamine hormone secretion.</li> </ul> <p>The LES looks to reduce noise by</p>	Children and younger people	Disproportionate	+	<p>Some noise abatement methods such as traffic management (rerouting traffic, limiting time which roads are accessible to certain vehicles, using trees and shrubbery as a noise barrier) would benefit 'at risk' groups if they were targeted around facilities disproportionately used by these groups (e.g. health centres, care homes, schools etc).</p> <p>It is acknowledged that GLA intends to examine the effects of noise on at risk</p>

Policy Area	Potential Impact	Equality Groups Affected	Proportionality	Impact (+ / -)	Recommendations for Mitigation or Enhancement
	<p>encouraging modal shift away from the car, and minimising impact from other sources such as taxis, rail and aviation. It is also links the particular impact noise exposure has on children, and their learning abilities. The plan has some spatial aspects, opposing the expansion of London Heathrow and seeking to minimise noise around water spaces. Looking at noise impacts from construction and at night, alongside other measures such as modal shift will reduce exposure to levels of noise. Overall, the strategy may improve access to quiet and tranquil places for all people, but those places themselves may be threatened unless the overall levels of noise can be maintained or reduced effectively.</p>	Older Londoners	Disproportionate	+	<p>groups (including children) through engagement with key stakeholders through the consultation process.</p>
		Disabled people	Disproportionate	+	

Policy Area	Potential Impact	Equality Groups Affected	Proportionality	Impact (+ / -)	Recommendations for Mitigation or Enhancement
Adapting to climate change	<p>Climate change would disproportionately impact on people on lower incomes who will be less able to respond. Children, disabled and older people are particularly sensitive to the effects of more intense and severe weather.</p> <p>The implementation of Healthy Streets Approach will increase shading to provide shelter from extreme heat. The Strategy also proposes to continue to monitor and report on the effects of climate change with a particular focus on households/people in flood risk areas and disparities in heat-related morbidity and mortality across 'at risk' populations. Similarly, ways to better deal with and communicate heat issues in London and to its people will also be of help.</p>	<p>People on lower incomes            Disabled            Older people            Children</p>	Proportionate	+	N/A
waste	<p>The strategy will significantly reduce municipal waste, sending no waste direct to landfill by 2026 and cutting waste sent to incineration by 50% per person below 2015 levels by 2030.</p> <p>This Policy Area aims to reduce the number of vehicles transporting municipal waste and increase the use of sustainable transport modes.</p>	All Londoners	Proportionate	+	N/A
Climate change	The proposed Mayor's Fuel Poverty Action Plan focuses specifically on	Older Londoners	Disproportionate	+	

Policy Area	Potential Impact	Equality Groups Affected	Proportionality	Impact (+ / -)	Recommendations for Mitigation or Enhancement
mitigation and Energy	socio-economic inequalities. This is expected to include proposals such as retrofitting low income and fuel poor homes; supporting the boroughs in their work on tackling affordability; and, smart meters to replace prepayment meters. This is likely to lead to an increase in community energy projects across London, identification of clean and reliable energy production where it will most benefit low income households.	Londoners on low incomes	Disproportionate	+	
Water	Proposals to provide efficient, reliable, secure and affordable water supplies will provide benefits for all Londoners. Proposals to introduce water meters should help address water poverty for low income households except for those who have higher essential use requirements, e.g. large families with children and disabled people with certain medical conditions.	Londoners on low incomes	Disproportionate	+	N/A
		Large families with children	Disproportionate	-	
		Disabled people with certain medical conditions	Disproportionate	-	
Transition to a Low Carbon Circular Economy	The growth in the number and value of jobs in low carbon businesses and the environmental sector may provide opportunities to address some existing inequality in the jobs market, particularly for lower skilled people.	Young people Older people	Proportionate	+	Implementation plans for the draft LES for consultation should address the issue of skills development programmes for young people and low-income communities, to seize the opportunities and benefits arising from this transition to a circular economy. GLA should monitor the diversity profile of the environmental sector and low carbon businesses and use the opportunity of growth in these areas to increase the employment of people from under-represented groups in London's labour force.
		Londoners on low incomes	Disproportionate	+	

## 5.0 Conclusions and Findings

### 5.1 Introduction

The EqIA has investigated the potential impact of the strategy on equality groups. This section summarises the findings and provides recommendations as to how equality issues can be monitored and impacts reviewed throughout the delivery of the strategy.

### 5.2 EqIA findings

#### 5.2.1 Likely effects on equality groups

The EqIA has examined the proposed strategy, socio-demographic data gathered in relation to the IIA and consultation findings. Based on this, and using professional judgement, the EqIA has identified a number of disproportionate beneficial effects on equality groups that may occur as a result of the implementation of the proposed strategy. These are:

- A beneficial effect of improved air quality for children and younger people arising from the targeting of policies to areas around schools. Air quality improvements will also benefit older people and people with respiratory and cardiac issues.
- Policies aimed at reducing ambient noise levels will benefit children and younger people, older Londoners and disabled people.
- The proposed Mayor's Fuel Poverty Action Plan focuses specifically on fuel poverty. This is expected to include proposals such as retrofitting low income and fuel poor households.
- Support for the introduction of water meters should help address water poverty for low income households.
- The growth in the number and value of jobs in low carbon businesses and the environmental sector through the transition to a circular economy should provide opportunities to address some existing inequality in the jobs market (for young people and those on low incomes).

#### 5.2.2 Potential enhancement measures

The proposed measure to address air quality aimed at improvements around schools could be complemented by similarly-targeted policies for auditing other sites used by at risk users such as outdoor play areas, care homes and hospitals (e.g. for older people, people with existing respiratory and cardiac problems).

In street design and traffic management consider use of noise abatement methods (rerouting traffic, limiting time which roads are accessible to certain vehicles, using trees and shrubbery as a noise barrier) which would benefit 'at risk' groups if they were targeted around facilities disproportionately used by these groups (e.g. health centres, care homes, schools etc).

The Mayor's Fuel Poverty Action Plan should help protect lower income groups from being disproportionately affected by the additional costs associated with heating and cooling likely to arise from climate change. However, it may well be that further research is required in relation to cooling, given there is no universally-accepted definition of 'overheating' at present. Nevertheless, going forward the affordability of energy during hot weather will be as key an issue as that relating to cold weather.

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Implementation plans for the draft LES for consultation should address the issue of skills development programmes for under-represented groups, such as young people, older people and low income communities, to seize the opportunities and benefits arising from the transition to a circular economy.