

## Equality Impact Assessment (EqIA) for London Plan Guidance

London Plan Guidance:	'Be Seen' energy monitoring guidance
Date:	September 2021

1. Please provide an outline of the guidance, who it is aimed at and any key issues to be aware of.

Draft London Plan Policy SI 2 Minimising greenhouse gas emissions sets out the 'be seen' requirement for all major development proposals to monitor and report on their actual operational energy performance. The 'be seen' policy will help in understanding the performance gap (i.e. the gap between the predicted energy use at design stage and actual energy use in operation) and identify ways of closing it while ensuring compliance with London's net zero-carbon target.

The document explains the process that needs to be followed to comply with the post construction monitoring requirement of draft London Plan Policy SI 2 i.e. the 'be seen' element of the energy hierarchy. It is aimed at those involved in the planning, design, construction, delivery and operation of new major development.

It sets out what each responsible party needs to do to comply with the policy from the inception stage of a development to full occupancy. It provides information on the 'be seen' monitoring portal and explains how and when to report to the GLA.

2. Which of the Public Sector Equality Duty aims are relevant to the guidance and the impacts identified?

2) Advance equality of opportunity between people who share a protected characteristic and those who do not, in particular having due regard to the need to:

- b) Take steps to meet the needs of people with certain protected characteristics where these are different from the needs of other people.

## Assessment

### List aspects of the guidance that might affect particular groups

Guidance key aspects, chapter headings, theme etc	Particular group that could be affected
In-use stage: process and requirements	Women, Black, Asian and minority ethnic, low-income, disabled, younger people.

It should be noted that the general policy requirement and principles are already required through the London Plan. This London Plan Guidance is providing further detail on how the policies should be implemented, and therefore further amplifying the effects.

### Equality impacts, mitigating actions and justification (where applicable)

Group	Potential impact description	Relevant PSED aim (1, 2a, b or c, and/or 3)	Actions identified and/or justification	Assessment of equality impacts
	What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).		For negative impacts, set out mitigating actions to minimise or eliminate negative impacts and any action plan. If negative impacts cannot be mitigated, provide <u>objective justification</u> . For positive impacts, consider how these could be maximised.	Score each impact as either: +2 Strong positive +1 Positive 0 Neutral - 1 Negative - 2 Strong negative Mixed or uncertain

Age	<p><b>Positive</b></p> <p>The guidance focuses on gathering information on the energy performance for buildings. Ultimately the aim is to help close the performance gap and ensure buildings meet policy requirements. In the medium-long term the guidance will provide a source of data to inform future approaches which can help to ensure that energy use and associated bills are as expected and affordable for occupiers. This may be positive for younger households who are more likely to be fuel poor – however given the focus of the guidance is on gathering information no measurable impact can be attributed from the guidance itself. Equalities impacts will continue to be reviewed as part of the development of any future approaches connected to the information gathered through implementation of the guidance.</p>	2b	<p>The guidance encourages the identification of remediation measures to improve energy performance where buildings are not performing as expected. The data provided through implementation of the guidance will inform further action that can be taken in future approaches.</p>	
	<p><b>Negative</b></p>			

	No anticipated impacts			
Disability	<p><b>Positive</b></p> <p>The guidance focuses on gathering information on the energy performance for buildings. Ultimately the aim is to help close the performance gap and ensure buildings meet policy requirements. In the medium-long term the guidance will provide a source of data to inform future approaches which can help to ensure that energy use and associated bills are as expected and affordable for occupiers. This may be positive for households with disabled people who often experience higher energy costs, however given the focus of the guidance is on gathering information no measurable impact can be attributed from the guidance. Equalities impacts will continue to be reviewed as part of the development of any future approaches connected to the information gathered through implementation of the guidance.</p>	2b	<p>The guidance encourages the identification of remediation measures to improve energy performance where buildings are not performing as expected. The data provided through implementation of the guidance will inform further action that can be taken in future approaches.</p>	

	<b>Negative</b> No anticipated impacts			
Gender reassignment	<b>Positive</b> No anticipated impacts			
	<b>Negative</b> No anticipated impacts			
Marriage and civil partnership	<b>Positive</b> No anticipated impacts			
	<b>Negative</b> No anticipated impacts			
	<b>Positive</b>			

Pregnancy and maternity	No anticipated impacts			
	<p><b>Negative</b></p> <p>No anticipated impacts</p>			
Race or Ethnicity	<p><b>Positive</b></p> <p>The guidance focuses on gathering information on the energy performance for buildings. Ultimately the aim is to help close the performance gap and ensure buildings meet policy requirements. In the medium-long term the guidance will provide a source of data to inform future approaches which can help to ensure that energy use and associated bills are as expected and affordable for occupiers. This may be positive for Black, Asian and minority ethnic households who are more likely to be fuel poor – however given the focus of the guidance is on gathering information no measurable impact can be attributed at this stage. Equalities impacts will continue to be reviewed as part of the development of any future approaches connected to the</p>	2b	<p>The guidance encourages the identification of remediation measures to improve energy performance where buildings are not performing as expected. The data provided through implementation of the guidance will inform further action that can be taken in future approaches.</p>	

	information gathered through implementation of the guidance.			
	<b>Negative</b>  No anticipated impacts			
Religion or belief	<b>Positive</b>  No anticipated impacts			
	<b>Negative</b>  No anticipated impacts			
Sex	<b>Positive</b>  The guidance focuses on gathering information on the energy performance for buildings. Ultimately the aim is to help close the performance gap and ensure buildings meet policy	2b	The guidance encourages the identification of remediation measures to improve energy performance where buildings are not performing as expected. The data provided through	

	<p>requirements. In the medium-long term the guidance will provide a source of data to inform future approaches which can help to ensure that energy use and associated bills are as expected and affordable for occupiers. This may be positive for women who make up the majority of single-parent households and are more likely to be in part-time or lower-paid work. However, given the focus of the guidance is on gathering information no measurable impact can be attributed from the guidance. Equalities impacts will continue to be reviewed as part of the development of any future approaches connected to the information gathered through implementation of the guidance.</p>		<p>implementation of the guidance will inform further action that can be taken in future approaches.</p>	
	<p><b>Negative</b></p> <p>No anticipated impacts</p>			



Sexual orientation	<p><b>Positive</b></p> <p>No anticipated impacts</p>			
	<p><b>Negative</b></p> <p>No anticipated impacts</p>			
People on low incomes	<p><b>Positive</b></p> <p>The guidance focuses on gathering information on the energy performance for buildings. Ultimately the aim is to help close the performance gap and ensure buildings meet policy requirements. The 2019 CCC report estimates closing the energy use performance gap in new homes could save between £70 and £260 in energy bills per household per year. In the medium-long term the guidance will provide a source of data to inform future approaches which can help to ensure that energy use and associated bills are as expected and affordable for occupiers. This may be positive for people on low incomes, however given</p>	2b	<p>The guidance encourages the identification of remediation measures to improve energy performance where buildings are not performing as expected. The data provided through implementation of the guidance will inform further action that can be taken in future approaches.</p>	

	the focus of the guidance is on gathering information no measurable impact can be attributed from the guidance. Equalities impacts will continue to be reviewed as part of the development of any future approaches connected to the information gathered through implementation of the guidance.			
	<b>Negative</b>  No anticipated impacts.			

### Overview of equality impacts

Using your findings from the table above, summarise the impacts for each group in the table below using the scoring listed above.

	Age	Disability	Gender reassignment	Marriage and civil partnership	Pregnancy and maternity	Race	Religion and belief	Sex	Sexual Orientation	People on low incomes
Be Seen	No anticipated impacts	No anticipated impacts	No anticipated impacts	No anticipated impacts	No anticipated impacts	No anticipated impacts	No anticipated impacts	No anticipated impacts	No anticipated impacts	No anticipated impacts

## Amendments to the guidance

Change	Reason for change

## Recommendation

Based your assessment, please indicate which course of action you are recommending to decision makers.

Outcome Number	Description	Mark with an X
Outcome One	<b>No major change to the guidance is required</b> This EqlA has not identified any potential for discrimination or negative impact, and all opportunities to advance equality have been taken.	x
Outcome Two	<b>Adjustments to the guidance are required</b> to remove barriers identified by the EqlA or better advance equality.	
Outcome Three	<b>Justify and continue with the guidance</b> despite having identified some potential for negative impacts or missed opportunities to advance equality.	
Outcome Four	<b>Stop, rethink or abandon</b> when the EqlA shows actual or potential unlawful discrimination	

## Monitoring

Monitoring will take place through the London Plan Annual Monitoring Report and wider monitoring of the Mayor's other strategies as well as part of reviewing the London Plan.

## Appendix A: Evidence Reference and Content

### London Plan IIA (including EqIA) and Addendums

#### Evidence

##### Age

###### [Equality, diversity and inclusion evidence base for London](#)

A household is defined as being fuel poor if it has higher than typical energy costs and the household's income would fall below the poverty line if it paid for these costs (60 per cent of median equivalised household income).

Younger households are more likely to be fuel poor, including those households with children aged 16 or under (16-21 per cent depending on the age of youngest child), and those households where the oldest member is aged 16-24 (22 per cent). Income is likely to be an important factor driving fuel poverty in younger households as they tend to have lower incomes

In addition, lower-income households often experience a 'poverty premium' in energy, whereby those living below the poverty line pay more buying fuel than other households.

##### Disability

A household is defined as being fuel poor if it has higher than typical energy costs and the household's income would fall below the poverty line if it paid for these costs (60 per cent of median equivalised household income).

[Thirty-nine per cent of households in England living in fuel poverty include a disabled person.](#) A third of disabled adults say their impairment or condition has a significant impact on their energy costs. Disabled people with limited mobility, for example, might have to use more heating to keep warm, whilst people using assistive technology or electrical equipment such as powered wheelchairs will use additional electricity to charge these items.

##### Gender reassignment

No evidence was found which is relevant to energy monitoring guidance

##### Marriage or Civil Partnership

No evidence was found which is relevant to energy monitoring guidance

##### Pregnancy and maternity

No evidence was found which is relevant to energy monitoring guidance

##### Race

###### [Equality, diversity and inclusion evidence base for London](#)

A household is defined as being fuel poor if it has higher than typical energy costs and the household's income would fall below the poverty line if it paid for these costs (60 per cent of median equivalised household income).

In 2016 a higher proportion of Black, Asian and minority ethnic households were living in fuel poverty (17 per cent) compared to the proportion of white households living in fuel poverty (10 per cent).

Income is likely to be an important factor driving fuel poverty amongst Black, Asian and minority ethnic households as they tend to have lower incomes and/or a greater number of adults in the household, increasing required costs.

In addition, lower-income households often experience a 'poverty premium' in energy, whereby those living below the poverty line pay more buying fuel than other households.

### *Religion or belief*

No evidence was found which is relevant to energy monitoring guidance

### *Sex*

#### [Equality, diversity and inclusion evidence base for London](#)

A household is defined as being fuel poor if it has higher than typical energy costs and the household's income would fall below the poverty line if it paid for these costs (60 per cent of median equivalised household income).

In London, around 1 in 10 households are fuel poor. [90% of single parents are women.](#) Across England, single parents are more likely to live in fuel poverty than other household types, with a quarter of single parents (26 per cent) fuel poor in 2016. [Women also make up 73% of those in part-time work and 70% of low earners.](#)

### *Sexual orientation*

No evidence was found which is relevant to energy monitoring guidance

### **Gaps in Evidence**

None identified

## Appendix B: Engagement summary

### Summary of protected groups engaged

Already engaged: Engagement events during the development of the guidance has been aimed at relevant industry stakeholders who are involved in implementing the policy including developers, consultants and borough officers.

Future engagement: No negative impacts on groups with protected characteristics has been identified – no EqlA specific engagement necessary.

### Engagement record

Engagement undertaken which is relevant to the EqlA for example with specific community groups, or protected characteristic groupings, or to fill identified evidence gaps.

Event details	Specific groups represented	Key findings
n/a	n/a	n/a