

London Gypsies and Travellers Feedback to London Plan Integrated Impact Assessment Consultation

13 February 2026

Thank you for the opportunity to comment on the scoping report draft of the Integrated Impact Assessment.

The communities that *London Gypsies and Travellers* works to support are among the most deprived and marginalised in London in particular and in Britain in general. Our vision for the future is of an inclusive London where Gypsy and Traveller cultures are celebrated, rights protected and communities thrive free from discrimination. We want to continue working with the GLA, amongst other partners, to achieve this vision.

We would like to submit our comments to these consultation questions:

Question 4 Do the IIA objectives and assessment questions provide a sound framework against which to assess the sustainability performance of the emerging London Plan?

The framework could be improved in these ways:

1. Definitions that would enable an assessment method

We welcome the setting of benchmarks for an assessment of how the London Plan could improve the life experiences of the deprived and marginalised. We note that these terms are used throughout the scoping report, but are not defined. In general, methodologically, there would be merit in defining the terms "deprivation" and "marginalisation", which may be different for different categories of protected characteristics. The definitions would help frame the assessment of potential impacts of policies in the London Plan, obviously aiming to reduce deprivation and marginalisation where this is possible, in assessable ways. The scoping report presents many statistics for different indicators. Implicitly, it is assumed that a effective London Plan would yield different statistics down the line; for instance, more Disabled people would be living in accessible properties, and in that way would experience less deprivation, measured in terms of being able to use one's own kitchen and bathroom. This method of impact assessment needs to be made explicit under each subject, policy, and for each characteristic. We also note that the term "needs" is used unproblematically, whereas we encourage an explicit relation between needs and human rights, just as the Equality Act 2010 does. We read the objectives of the London Plan and its Integrated Impact Assessment as aligned with the fulfilment of economic, social and cultural rights.

>Comment 1: We recommend defining the terms "deprivation" and "marginalisation" for each protected characteristic under the Equality Act 2010, and outlining methods for assessing the reduction of deprivation and marginalisation. We suggest that the relationship of needs to the respect, protection and fulfilment of economic, social and cultural rights be made explicit, however briefly.

2. Presentation of London Plan policies and their impacts in easily-understandable format

Currently, the scoping report reads as a description of London's social and environmental problems, in chapters ordered by policy theme. Though interesting, this presentation is not a practical tool for assessing the impact of different policies. Along with other groups campaigning for London's progressive and equitable policy practices, we would like to see analysis on each policy in the London Plan with expected impacts on each protected characteristic under the Equality Act 2010, and also where different characteristics intersect. It is at a granular level of detail that the deprivation and marginalisation can be effectively addressed. Even if the expected impact is only described in one phrase, or if only certain policies are relevant to certain characteristics, there is merit in listing all the combinations. For instance, are much higher rates of disability among Gypsies and Travellers than in other minoritised groups. The inaccessibility of the public realm will therefore disproportionately impact Gypsies and Travellers who are Disabled and their carers. Making the public realm more accessible would therefore be expected to reduce the marginalisation of Gypsies and Travellers. We would like to see the Integrated Impact Assessment systematically list the policies, who they will impact, and how improvement will be assessed.

>Comment 2: We suggest ordering the chapters or sub-chapters according to the policies of the London Plan, with a clear listing of impacts on Londoners with protected characteristics, with attention to how these characteristics intersect. The indicators of improvement should be specific to each combination of policy-impact-Londoners (in their rich intersectional diversity). Presenting these combinations as a table would make the assessment easy to understand.

Question 1 Have there been any significant omissions of plans, policies, programmes or sustainability objectives relevant to the scoping of the IIA?

Gypsies' and Travellers' rights and needs can be included in more of the objectives:

3. Gypsies and Travellers integrated into all relevant themes

We note that Gypsies and Travellers are the only ethnic groups that are mentioned in a standalone subheading in "Gypsy and Traveller Accommodation" (p.80). Other ethnic and religious groups also have the right to culturally suitable accommodation, just as everyone does, for instance residences for Haredi Jews, or community spaces for practicing Somali Muslims: but LGT is not in a position to speak about their needs. We understand the unique necessity of describe Gypsy and Traveller accommodation, due to the communities' culture and practice of nomadism, is specific, and we welcome attention to them; however, we also note that Gypsies and Travellers are affected by policies that affect all Londoners generally, and Black, Asian and other minoritised groups particularly. We would like the impacts along racial lines to include mention of Gypsies and Travellers wherever relevant, rather than keep their needs separate.

For instance, the following additional questions could integrate considerations of race, ethnicity and religion into the policy prompts (p.19; additions are in italics):

1. Help to facilitate the delivery of net additional housing, minimising loss of existing decent homes?
2. Support increased housing choice in the mix of provision sought that reflects the range of Londoners' needs, *particularly those who need social rented housing in diverse forms, including:*
 - *accessibility for Disabled people, adaptable to accommodate physical and learning disabilities, sensory and neurodivergent impairments, and mental health illness?*
 - *Gypsies and Travellers who need culturally suitable accommodation, and accessible accommodation?*
 - *other religious, ethnic and cultural needs?*
3. Support design that is appropriately adaptable to anticipated future changes in housing needs?
4. Support improved and sustained housing quality in the space and fabric durability sought?
5. Ensure existing residents affected by development have continuity of access and enjoyment of their homes?
6. Promote housing affordability through expected contributions or specifications that will reduce running costs?

>Comment 3: We suggest that consideration for the needs of Gypsies and Travellers should be prompted in every relevant topic, along with the needs of other specific groups with protected characteristics (who have been historically overlooked, resulting in deprivation and marginalisation).

4. Prolonging the relevance of the Integrated Impact Assessment to the communities most impacted by the London Plan

We note that the draft scoping report mentions the "forthcoming" London-wide Gypsy and Traveller Accommodation Needs Assessment, which was in fact published in November 2025 (p.80). This is one of many temporal references which will become quickly outdated in the report. In relation to temporal relevance, we also note that the 2025 London Gypsy and Traveller Accommodation Needs Assessment attempted to measure need until 2033, whereas the forthcoming London Plan will cover the period until 2048. We therefore suggest removing reference to the 2025 London Gypsy and Traveller Accommodation Needs Assessment as it will not provide a long-lived evidential benchmark for assessing impact. On the other hand, the

Integrated Impact Assessment would be an opportunity to establish how solid evidential benchmarks should be arrived at. LGT recommends that community involvement and expertise be integrated into the whole exercise.

>Comment 4: We recommend the involvement and co-production with community expertise, especially those communities whose deprivation and marginalisation are structured by protected characteristics, in the formulation of evidential benchmarks. London's communities will benefit from responsiveness and transparency in the monitoring of the impact of policies on them.

END OF FEEDBACK