



## **1. INTRODUCTION**

The Women's Resource Centre (WRC) is a co-ordinating and support agency for voluntary and community organisations that work to improve the status of women. The majority of our 150 member groups operate in Greater London, often working with some of the most marginalised communities in the capital.

To inform our response to the Draft London Plan, WRC invited feedback from members, and participated in inter-agency consultations. Previous consultations with members and research on women in London has also been used to respond to the issues raised in the Draft London Plan.

Please note that not all WRC members may agree on certain points raised in this response. Rather, this response is based on the variety of comments received and information available. All comments received by WRC members were included.

## **2. GENERAL COMMENTS**

WRC supports the broad strategic objectives of the plan and commends the Mayor's commitment.

However, while we can appreciate that the Draft London Plan is a strategic plan, WRC advocates that further consultation and the development of partnerships needs to be undertaken with women's organisations when **developing strategies to achieve the policy objectives and in implementing the London Plan**. This should be a priority for the GLA, Boroughs and the private sector in order for the London Plan to address social polarisation, practical needs of women and equalities in a meaningful way. We would expect a gender forum, in line with the older citizens forum, to be established to discuss these issues, amongst others.

No Campaign, a London based organisation campaigning against the most overt forms of sexism and its social consequences, also noted that from their experience with councilors and officers it is also clear that gender and equalities training is urgently needed at the local level – an initiative the Mayor should recommend.<sup>1</sup> However, many of the issues discussed require an overarching London-wide strategy rather than being left, as is presently the case, to individual bodies (such as councils, bus operators etc).

### 3. THE DRAFT LONDON PLAN - STRATEGIC ISSUES ADDRESSED

#### 3.1 Housing

##### 3.1.1 General

WRC supports the proposed minimum targets of 23,000 new houses per annum, particularly in areas of high deprivation and disparity such as Tower Hamlets, where WRC is based and which has significant Black and Minority Ethnic (BME) populations.

The increased provision of housing should be accompanied by general community regeneration. Additionally, housing developments should be located close to amenities and public transport.

Regarding the development of increased housing, Policy 3A.16 states that Boroughs should resist the net loss and enhance social infrastructure and community facilities. This should also include social services provided by NGO/voluntary organisations who are often the first point of call for local women and whom often assist with multiple issues.

##### 3.1.2 Affordable Housing

Housing is a critical issue for women and particularly affects lone parents, women on low incomes and women living with domestic violence. WRC supports the provision of 50 percent (in most Boroughs) affordable housing as women in London are most likely to head social rented housing than private rental or ownership.<sup>ii</sup> **Women's Pioneer Housing**, an organisation that deals specifically with affordable housing for women, would welcome the opportunity to work with the GLA and Boroughs on this issue.

##### 3.1.3 Design

Designers need to be aware of the safety implications required for women not only in houses but also the immediate surrounding areas, particularly in blocks of housing or developments. An opportunity exists for the GLA, Boroughs and private investors to work with women's groups involved in design such as the **Women's Design Service** based in Islington.

##### 3.1.4 Equalities

An opportunity also exists to include women in the construction of housing, a field overwhelmingly dominated by men. This would also contribute to the broader equalities remit and most importantly, provide an example for the UK including girls and women wanting to move into construction and building occupations. **Women's Education in Building** and **Women in Manual Trades** are two women's organisations working in this field.

#### 3.2 Employment

##### 3.2.1 General

Despite women's significant contribution to unpaid/voluntary labour as well as the paid labour force and equal opportunities legislation, true equal opportunities continue to elude us.

Not only does financial stability greatly improve women's (and their children's) general life opportunities but the reverse is also true. For example, women living with domestic violence often find that their ability to take-up and retain paid employment is greatly effected by the violence and that their employment history is peppered with intermittent periods of employment with unemployment - often leading to dependency on the perpetrator or the welfare system and poverty. Once women fall below an adequate income threshold, multiple problems are generated and their physical and mental health can (rapidly) decline.<sup>iii</sup>

WRC notes Paragraphs 3B.59 and 3B.60.

### 3.2.2 Access to Paid Employment

WRC would like to further emphasise the fact that the provision of accessible and affordable child care and access to safe and reliable transport is imperative to women accessing employment opportunities.

The needs of women caring for older, disabled or multiple family members must also be addressed.

### 3.2.3 Equalities

The London Plan states that 636,000 new employment opportunities will be created, with emphasis on BME communities and ensuring that we are able to take full advantage of this through education and training and eliminating barriers such as racism. WRC supports this objective but is unclear exactly where the GLA envisions the opportunities existing for BME peoples. WRC would not support the mass employment of BME peoples in low-paid occupations in order to meet targets of getting BME peoples into employment.

WRC would support the prioritisation of BME women in employment strategies. BME women represent 44 percent of unemployed women in London yet are 30 percent of the female population.<sup>iv</sup>

Given the GLA's commitment to equalities and addressing social polarisation, WRC believes that the GLA has an opportunity to work with other organisations in addressing the gender pay gap. If the London Plan has some measure of success in improving women's take-up of paid employment, the fact remains that we will receive 23 percent less than men (on an hourly basis) which is higher than the UK average despite London being the UK's financial hub.<sup>v</sup> To implement a meaningful employment policy for women involves addressing the gender-pay disparity.

Following the equalities theme, WRC is interested if knowing it the GLA intends to address discrimination against Lesbian women in the work force given that 44 percent of Lesbian, gay and bi-sexual trade unionists have reported being discriminated against in the workplace.<sup>vi</sup>

## 3.3 Transport

### 3.3.1 General

WRC notes the GLA's concern with public transport accessibility and safety and also the very specific relationship between transport and employment. Given women's greater dependency on public transport, this issue affects all facets of women's lives including employment, leisure, health, care responsibilities and education.

### 3.3.2 Access

Given the wage disparity and the low annual incomes of many women (37 percent of female taxpayers earn less than £10,000 pa), public transport must be reasonably priced.<sup>vii</sup>

### 3.3.3 Safety

Research has indicated that almost 2/3 of women felt unsafe traveling by train or tube at night and that 50 percent felt unsafe on buses. Forty one percent of women surveyed had brought and used cars specifically for traveling (mostly from work) at night.<sup>viii</sup> As also noted Jennette Arnold's (MP) recent report, the GLA must prioritise women's fears of public transport if the transport objectives of the London Plan and the Transport Strategy are to be inclusive of all.<sup>ix</sup>

It should be noted that safety is both real and perceived, physical and psychological. No Campaign advocates that when this environment includes adverts for gentlemen's strip clubs and advertisements of an explicit sexual nature the traveling experience can be compromised.

From discussions with VIACOM, who 'vet' ads on public transport (both for the buses and the tube, not currently under the Mayor's remit) it appears individual operators decide what is and is not appropriate. Hence some buses allow adverts for strip joints, others do not. One policy should be applied consistently. No Campaign would also like to point out that taxis, that do fall under the Mayor's remit, carry ads for strip joints. No Campaign recommends that there should be an overarching code as to what is and is not deemed an appropriate business for advertising on public transport and in what manner it may advertise.

No Campaign would also like reassurance that, when the Mayor does take over the underground, that the sale of top shelf pornography on underground platforms (public places) will not be tolerated, and preferably nor will it be tolerated in the foyer of stations or in the kiosks outside. Failing that, we would expect its sale to be limited and for it to be displayed on the 'top shelf'.

No Campaign also questions the appropriateness of the sale of 'lads mags' (with pornographic-style covers) on the underground. Additionally, if Rupert Murdoch, is successful in his bid to produce a Metro-style free paper distributed at tube stations, that the sexist imagery, language and culture of the Sun will not be tolerated.

## 3.4 Education

### 3.4.1 Equalities

WRC would again like to raise the issue of gender disparity in pay. Paragraph 3A.87 notes the importance of under and post graduates to London's labour supply and that they are "necessary for London to remain a globally competitive city"<sup>x</sup>. However, the fact remains

that female graduates will earn 15 percent less than their male counterparts and that this will increase as women get older.<sup>xi</sup>

### **3.5 Health**

#### **3.5.1 The Role of Women's Voluntary Sector Organisations**

WRC would like to emphasise the role that local women's groups play in facilitating access to health services and also the provision of health services. For example, domestic violence workers and workers in women's centres are often the first point of contact for women living with domestic violence. Survivors often present with mental (especially depression and post-traumatic stress disorder) and physical illnesses and problems and are then provided with in-house assistance or are referred on to other appropriate people. Women's organisations are integral members of the health field and should be regarded as such.

Women's organisations are also integral to health promotion, particularly to communities who experience barriers to mainstream services. Recent research has found that 11 percent of women's groups in London work in the health field. A further 12 percent work in sexual and domestic violence which have significant health implications also. Twenty-eight percent of women's organisations also worked with BME women.<sup>xii</sup> Over 200 women's health organisations responded to the GLA's women's health organisations directory research.<sup>xiii</sup>

Some of WRC's members have expressed concerns about Local Strategic Partnerships (LSPs). Comments have included feeling frustrated that their organisations are not fully involved or not involved at all in LSPs, particularly smaller women's groups. WRC is concerned with Policy 3A.17 and believes that community organisations should be specifically mentioned as being part of the partnership group along with "strategic health authorities, primary care trusts and local strategic partnerships".

Paragraph 3A.75 states that the London Plan "seeks to ensure that adequate health care facilities are provided as part of large scale commercial and housing developments". Facilities should also seek to ensure that cancer (particularly breast and gynaecological) and sexual and reproductive health services are accommodated for as WRC members identified that these issues are particularly pertinent to women.<sup>xiv</sup>

WRC fully supports Paragraph 3A.78 which acknowledges the holistic requirements of good health and the impacts of age, gender and ethnicity. WRC would also like to acknowledge that heterosexism and homophobia also impact on the health and well-being of Lesbians and Bi-sexual women. A woman's ability may also effect her general health as well as access to health services.

### **3.6 Environment**

#### **3.6.1 Design**

No Campaign notes that comment should be made regarding the increasingly sexual imagery and practices now endemic in London and states that these are not just offensive to many women (including survivors of sexual abuse), parents and indeed men, they are equally alienating to many ethnic minorities and those of faith and have a profound effect on shaping the attitudes of children.

Currently, decision-making on sex establishments and strip joints is left wholly in the hands of (typically white, male) councillors – who, according to White Hall codes ‘may visit lap dancing venues, on occasion’. There is consequently wide variation, with boroughs such as Wandsworth disallowing ‘sexual entertainment’, whilst Camden – host to the King’s Cross red light district – welcomes such establishments (with some 3 sex shops and 7 strip clubs). Furthermore, the Local Government Act (LGA) does not provide distinct proviso for ‘toplessness, nudity or sexual entertainment’ which means for councils that have not amended the Act by introducing such a clause, the existence of venues providing ‘sexual entertainment’ may be unknown and hence unmonitored. The Act should clearly be altered centrally to ensure distinct licensing for such ‘entertainment’, with provisos on their numbers and in relation to their location (distance from schools, religious centres, youth clubs, residential areas; and their potential impact on ‘red light’ areas). Furthermore the public should have far greater recourse for objection, including on moral grounds.

Given the Mayor’s commitment to equality and the manner in which this culture reflects on the city as a whole, these issues cannot simply be addressed at council level. A London-wide strategy is required. No Campaign believe it is inexcusable to allow further sex establishments and strip club until investigation has been carried out as to their link with crime, including prostitution and their contribution to deeply sexist attitudes. The LGA needs to be altered to take account the strip joint phenomenon, as outlined above. No Campaign would expect the Mayor to take a lead on these initiatives.

Unpaid-for fly posters are not just de-beautifying and illegal, they are frequently for pornographic magazines, ‘lads mags’, peep shows and strip joints with often inappropriate imagery. This again, cannot be left up to individual councils – a London-wide policy is required.

Decisions on the appropriateness of road side ads is determined by the Advertising Standards Authority (ASA), which is deemed inadequate by public transport companies, who enlist a separate, more selective pre-screening of material. Consequently, the public have been exposed to increasingly sexual and sexist imagery, despite the ASA receiving consistently high levels of complaint regarding ‘taste and decency’.

No Campaign appreciates that it is not the role of the Mayor or local authorities to curb ‘freedom of expression’. However, the increasingly sexual and sexist imagery used by roadside advertisers promotes an exclusionary culture, contributes to sexist attitudes and reflects poorly on the city as a whole. The ASA – a *self*-regulatory body – is not open to public scrutiny, its decision-making appears confused and it acts retroactively. Further it is concerned only with what may ‘cause public offence’, not with the wider social issue – namely, the underlying culture such imagery promotes.

The Mayor’s office should research itself the views of those most affected by such imagery (such as survivors of sexual assault) and take expert advice on the social consequences of such imagery. And use this evidence to then enter into dialogue with the ASA.

### 3.6.2 Equalities

Continuing with equalities and other related strategies (such as the Greater London Domestic Violence Project) is imperative to safer communities. WRC acknowledges the

GLA's Race Equality Scheme but believes that the GLA could be the primary facilitator of an anti-racism campaign in London to address racism at 'street and community level'.

### 3.6.3 Waste and Pollution

The London Plan sets specific targets to reduce waste and pollution. In relation to waste, while WRC supports the recycling and composting targets, WRC also believes that there is a necessity to reduce the need to recycle. The GLA could play an integral role in lobbying Government to reduce the packaging associated with consumerism (such as levying a charge on plastic bags).

Awareness raising campaigns about recycling will be needed to encourage people to recycle household waste more efficiently. Working with women's groups such as the **Women's Environmental Network**, Boroughs and the GLA could successfully develop and implement campaigns and projects at community level. This would contribute to increasing communities' knowledge of how to recycle, why it is imperative to do so and also disseminate information about the tangible results of people's recycling and composting efforts.

Not only do parks and green spaces contribute to our physical health, but they also contribute to our psychological and emotional well being. They provide respite and leisure. WRC avidly supports the protection of the green belt and parks.

Policy 4B.10 states that the Mayor and Boroughs "should work to protect and enhance London's historic environment". Communities should also be engaged in defining what buildings and areas they consider to be of a historic nature - including landmarks which are historic to that area and signify the character and uniqueness of that community.

## 3.7 London's Diverse Communities

### 3.7.1 The Future of London's Women's Organisations

Throughout this response, WRC has discussed the vital roles played by women's organisations in London and has emphasised the need to meaningfully engage with women's groups when developing strategies and implementing the London Plan.

Paragraph 3A.100 describes how the Mayor "considers it essential that policy frameworks are in place to protect, promote and enhance facilities and infrastructure relevant to meeting the needs of particular groups". Given that women are 50 percent of London's population and that there is a historic and significant need to deliver specific services to women who are consistently at risk of marginalisation, the Mayor and Boroughs must ensure that women's groups are able to continue and expand on their work with women and in communities in general.

Research has concluded that on average, women's groups in London work with eight different issues. Half of the groups surveyed operated on less than £100,000 pa and 19 percent operated on less than £10,000 pa. Women's groups reported a heavy reliance on the unpaid contributions (one fifth rely solely) of women volunteers.<sup>xv</sup> To ensure the health and well being of London women, the increased funding of women's groups must be a priority for all levels of Government and the private sector.

## 4. CONCLUSION

We generally welcome the London Plan and hope the comments within this submission will help to strengthen and clarify specific points within the Draft.

WRC would like to commend the Mayor's efforts on the London plan but reiterates the importance of developing strategies to ensure the meaningful inclusion of women's organisations to implement the London Plan, from conception and throughout the coming decades. Means of monitoring progress and assessing impact will also be important in documenting the Plan's efficacy.

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<sup>i</sup> No Campaign's response has been marginally edited. However, most of the response is included verbatim. No Campaign has also submitted their response to the GLA as an individual organisation.

<sup>ii</sup> Mayor of London. 2001. Homes for London's Women. Greater London Authority. London.

<sup>iii</sup> Pouwhare, Tania. The Effects of Family Violence on Maori Women's Employment Opportunities. National Collective of Independent Women's Refuges Incorporated. Wellington.

<sup>iv</sup> Mayor of London. 2001. Homes for London's Women. Greater London Authority. London.

<sup>v</sup> Ibid.

<sup>vi</sup> Ibid.

<sup>vii</sup> Mayor of London. 2002. Capital Women. Greater London Authority. London.

<sup>viii</sup> Women's Resource Centre and Ariadne Project. 1999. Changing the Face of London: What are the Issues for Women? Women's Resource Centre. London.

<sup>ix</sup> Arnold, Jenette and Rachel Flagg. Unsociable Hours: Safer Travel to Work for Women. London Assembly. London.

<sup>x</sup> Paragraph 3A.87

<sup>xi</sup> Unequal Pay Makes Burden of Student Debt Even Harder. 2002. Press Release. Equal Opportunities Commission.

<sup>xii</sup> Soteri, Andri. 2001. A Profile on Women's Organisations in London's Voluntary and Community Sector. Centre for Institutional Studies, University of East London. London.

<sup>xiii</sup> Mayor of London. 2002. Health Services for London' Women: A Directory of Voluntary and Community Sector Health Services for Women in London. Greater London Authority. London.

<sup>xiv</sup> Women's Resource Centre and Ariadne Project. 1999.

<sup>xv</sup> Soteri, Andri. 2001