

Equality Impact Assessment (EqIA) for London Plan Guidance

London Plan Guidance:	Circular Economy Statement Guidance
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1. Please provide an outline of the guidance, who it is aimed at and any key issues to be aware of.

A circular economy is defined as one where materials are retained in use at their highest value for as long as possible and are then reused or recycled, leaving a minimum of residual waste.

Circular Economy Statements are intended to demonstrate how a development will incorporate circular economy measures into all aspects of the design, construction and operation process, therefore encouraging development that is designed to eliminate waste, conserves resources, and manage waste sustainably at the highest value.

The Circular Economy Statement Guidance explains how to prepare a Circular Economy Statement as required by Policy S17 of the Intend to Publish London Plan for development proposals that are referable to the Mayor.

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 relevant protected characteristic and persons who do not share it

(a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic

Assessment

List aspects of the guidance that might affect particular groups

Guidance key aspects, chapter headings, theme etc	Particular group that could be affected
Improved implementation of the circular economy in London's built environment	Older adults and children; disabled people
Improvements to air quality resulting from less transportation of materials/waste	Older adults and children; disabled people; pregnant women; Black, Asian and ethnic minority communities

* 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	Actions identified and/or justification	Assessment of equality impacts
	What positive and negative impacts have been identified (known and potential) for particular groups?	(1, 2a, b or c, and/or 3)		Score each impact as either: +2 Strong positive +1 Positive 0 Neutral - 1 Negative - 2 Strong negative Mixed or uncertain
Age (consider particularly children,	Positive This guidance sets out how development proposals can effectively	2a	The positive impacts of this guidance can be maximised by encouraging applicants to produce 'pioneering' Circular Economy Statements, which go	+1

Group	Potential impact description	Relevant PSED aim (1, 2a, b or c, and/or 3)	Actions identified and/or justification	Assessment of equality impacts
under 21s and over 65s)	<p>implement circular economy principles, supporting the re-use and recycling of waste/materials. By reducing the demand for resource extraction/new material, the effective implementation of circular building principles should reduce carbon emissions and environmental degradation more generally.</p> <p>In the longer term, this is likely to have a positive impact on older and younger Londoners, who can be more at risk from the effects of severe weather associated with climate change, such as heat waves.</p>		beyond standard practice and the minimum requirements for Statements set out in the guidance. The guidance outlines how applicants can pursue this status, which will be encouraged through the development management process.	<p>Score each impact as either:</p> <p>+2 Strong positive +1 Positive 0 Neutral - 1 Negative - 2 Strong negative Mixed or uncertain</p>
	By supporting the effective implementation of circular economy principles in London's built environment (through the application	2a	The positive impacts of this guidance can be maximised by encouraging applicants to produce 'pioneering' Circular	+1

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	<p>of the Circular Economy Statement Guidance) – including the reuse and recycling of material found on-site– the guidance should contribute to reducing emissions and concentrations of harmful pollutants.</p> <p>This should have a positive impact on older and younger Londoners who may be more susceptible to the health effects or air pollution.</p>		Economy Statements, which go beyond standard practice and the minimum requirements for Statements set out in the guidance. The guidance outlines how applicants can pursue this status, which will be encouraged through the development management process.	
	<p>Negative</p> <p>No anticipated impacts</p>			

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Disability (consider different types of physical, learning or mental disabilities)	<p>Positive</p> <p>As described above, the guidance is likely to have a positive impact on carbon emissions and the environment, and therefore contribute to the mitigation of climate change.</p> <p>Disabled Londoners may be more likely to suffer the effects of severe weather associated with climate change, and so the effective implementation of the circular economy in the built environment may help to reduce these impacts.</p>	2a	The positive impacts of this guidance can be maximised by encouraging applicants to produce ‘pioneering’ Circular Economy Statements, which go beyond standard practice and the minimum requirements for Statements set out in the guidance. The guidance outlines how applicants can pursue this status, which will be encouraged through the development management process.	+1

	<p>The hierarchy of CE design approaches outlined in the decision tree encourages on-site reuse, followed by reuse nearby, and then reuse offsite. This may help to reduce the transportation of materials and waste and encourage materials to be kept at a high value and their use for as long as possible. This could help to reduce carbon emissions from new development and contribute to reducing air pollution.</p> <p>Respiratory conditions such as asthma can result in a person sharing the protected characteristic of disability. Any improvements to London's air quality resulting from effective implementation of the circular economy is therefore likely to positively impact on disabled Londoners.</p>	2a	<p>The positive impacts of this guidance can be maximised by encouraging applicants to produce 'pioneering' Circular Economy Statements, which go beyond standard practice and the minimum requirements for Statements set out in the guidance. The guidance outlines how applicants can pursue this status, which will be encouraged through the development management process.</p>	+1
	<p>Negative</p> <p>No anticipated impacts</p>			
Gender reassignment	<p>Positive</p>			

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	No anticipated impacts			
	Negative No anticipated impacts			
Marriage and civil partnership	Positive No potential impacts identified.			
	Negative No potential impacts identified.			
Pregnancy and maternity	Positive	2a	The positive impacts of this guidance can be maximised by encouraging applicants to produce 'pioneering' Circular	+1

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	<p>As described above, effectively implementing circular economy principles and measures can contribute to reducing air pollution.</p> <p>Poor air quality can have negative impacts during pregnancy that affect both mother and baby. Improvements to air quality resulting from the effective implementation of the circular economy (through application of the Circular Economy Statement Guidance) are therefore likely to have a positive on pregnant women.</p>		<p>Economy Statements, which go beyond standard practice and the minimum requirements for Statements set out in the guidance. The guidance outlines how applicants can pursue this status, which will be encouraged through the development management process.</p>	
	<p>Negative</p> <p>No potential impacts identified.</p>			

Group	Potential impact description	Relevant PSED aim (1, 2a, b or c, and/or 3)	Actions identified and/or justification	Assessment of equality impacts
Race or Ethnicity (consider refugees, asylum seekers, migrants, gypsies and travellers)	<p>Positive</p> <p>People from Black, Asian and minority ethnic (BAME) backgrounds are more likely to be on lower incomes, live in deprived areas and be negatively impacted by poorer air quality. For example, 18.9% of Black households and 20.4% of Gypsy/Roma households nationally were made up of a single parent with dependent children (Census 2011), compared with 6.7% of White British households.¹</p> <p>As described above, effectively implementing circular economy principles and measures can contribute to reducing air pollution.</p>	2a	The positive impacts of this guidance can be maximised by encouraging applicants to produce ‘pioneering’ Circular Economy Statements, which go beyond standard practice and the minimum requirements for Statements set out in the guidance. The guidance outlines how applicants can pursue this status, which will be encouraged through the development management process.	+1

¹ [Families and households - GOV.UK Ethnicity facts and figures \(ethnicity-facts-figures.service.gov.uk\)](https://ethnicity-facts-figures.service.gov.uk)

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	Research on air quality in London suggests that areas with higher proportions of BAME Londoners are be more likely to be exposed to above EU-limit Nitrogen Dioxide levels. Effectively implementing circular economy measures - that help to reduce pollutant emissions - through the Circular Economy Statement Guidance is therefore likely to contribute to reducing the impact of poor air quality on BAME Londoners.			
	Negative No potential impacts identified.			
Religion or belief	Positive			

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	No potential impacts identified.			
	Negative No potential impacts identified.			
Sex	Positive Women are more likely to be on lower incomes than men. Around 90% of single parents are women. ² Single parents, due to their lower incomes, may be more likely to live in deprived areas and negatively impacted by poor air quality. As described above, effectively implementing circular economy			

² [Single parents: facts and figures - Gingerbread](#)

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	<p>principles and measures can contribute to reducing air pollution.</p> <p>By supporting the reuse of materials and potentially reducing the transportation and associated carbon emissions from new development, the Circular Economy Statement Guidance may contribute to reducing the impact of poor air quality on women.</p>			
	<p>Negative</p> <p>No potential impacts identified.</p>			
Sexual orientation	Positive			

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	No potential impacts identified.			
	Negative No potential impacts identified.			
People on low incomes	Positive As described above, effectively implementing circular economy principles and measures can contribute to reducing air pollution. Areas with poorer air quality are often more deprived. By implementing circular economy measures (through the Circular Economy Statement Guidance) that	2a	The positive impacts of this guidance can be maximised by encouraging applicants to produce 'pioneering' Circular Economy Statements, which go beyond standard practice and the minimum requirements for Statements set out in the guidance. The guidance outlines how applicants can pursue this status, which will be encouraged through the	+1

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	reduce the transport of materials and therefore reduce the emission of harmful pollutants, it is likely that low-income groups will be positively impacted.		development management process.	
	Negative No potential impacts identified.			

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
Guidance	+1	+1	No potential impacts identified.	No potential impacts identified.	+1	+1	No potential impacts identified.	+1	No potential impacts identified.	+1

The table above highlights the protected groups who could be positively impacted by the CE statements guidance.

The potential impact on people with multiple protected characteristics (for example, disabled, older women from Black, Asian and Minority Ethnic backgrounds) associated with the CE statements guidance may be more significant, due to the multiple intersecting inequalities experienced.

Amendments to the guidance

(only for review to the EqlA in the future)

Change	Reason for change
What changes have you made to the guidance as a result of this EqlA?	Why have these changes been made?
None required as the guidance results in positive impacts on groups who share a protected characteristic.	N/a

Recommendation

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

Outcome Number	Description	Mark with an X (more than one box can apply)
Outcome One	No major change to the guidance is required This EqlA has not identified any potential for discrimination or negative impact, and all opportunities to advance equality have been taken.	X
Outcome Two	Adjustments to the guidance are required to remove barriers identified by the EqlA or better advance equality.	
Outcome Three	Justify and continue with the guidance despite having identified some potential for negative impacts or missed opportunities to advance equality.	
Outcome Four	Stop, rethink or abandon 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

The impacts of more intense and severe weather associated with climate change can have impacts on health across the population, however children and older people can be part.³

Age is also an important factor in relation to the susceptibility to the health effects of air pollution, with younger and older people being more at-risk.⁴

Disability

Disabled people, particularly those who suffer from respiratory conditions may be impacted more by the health effects of air pollution and by the exacerbating impact of climate factors and climate change.⁵

Gender reassignment

No evidence was found which is relevant to Circular Economy Statements.

Marriage or Civil Partnership

No evidence was found which is relevant to Circular Economy Statements.

Pregnancy and maternity

Studies in London have shown that exposure to air pollution has a detrimental impact upon babies' health before they are born and is directly attributable to low birth weight.⁶

Race

Evidence on air quality suggests that places with higher proportions of some BAME communities are more likely to be exposed to levels of nitrogen dioxide that are above EU limits.⁷

³ Protecting Health in Europe from Climate Change, World Health Organisation, 2017.

⁴ Updated Analysis of Air Pollution in London, Aether, 2017.

⁵ Protecting Health in Europe from Climate Change, World Health Organisation, 2017.

⁶ Impact of London's road traffic air and noise pollution on birth weight: retrospective population-based cohort study, British Medical Journal, 2017.

⁷ Updated Analysis of Air Pollution in London, Aether, 2017.

Religion or belief

No evidence was found which is relevant to Circular Economy Statements.

Sex

90% of single parents are women. Single parents are more likely to have lower incomes and may be more likely to live in deprived areas with poorer air quality.

Sexual orientation

No evidence was found which is relevant to Circular Economy Statements.

Gaps in Evidence

No gaps in evidence identified.

Appendix B: Engagement summary

Summary of protected groups engaged

Already engaged: engagement with and input from industry stakeholders – primarily those who will be involved in the preparation and assessment of Circular Economy Statements - has taken place during the production of the guidance.

Future engagement: no specific engagements is proposed with groups who share protected characteristics given the technical nature of the guidance. The engagement that took place during the formal consultation on the draft guidance (which was open for 12 weeks) is highlighted below.

Engagement record

Date	Activity Type	Participation	Representation
13 Oct – 15 Jan 2021	Survey on the draft guidance Survey on the Equality Impact Assessment	All – general public	33 responses received on the draft guidance

	(Online and paper surveys available)		
25 Nov 2020		All – general public	Approximately 40 attendees
30 Nov 2020	Webinar	Borough	Approximately 20 attendees
3 Dec 2020	Webinar	All – general public	Approximately 40 attendees

Key findings from the consultation can be found in the associated [consultation summary report](#).

No responses were received on the draft CES LPG EqIA survey. No responses were received that referred to equality impacts.