

EqIA - Circular Economy Statements

Key information

Publication type: London Plan Guidance

Publication status: Draft

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1. Equality Impact Assessment (EqIA) for London Plan Guidance

London Plan Guidance: Circular Economy Statement Guidance – draft for consultation
October 2020

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 SI7 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

1.1 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	<p style="text-align: center;">Potential impact description</p> <p>What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).</p>	<p>Relevant PSED (1, 2a, b or c, and 3)</p>
Age	<p>Positive</p> <p>This guidance sets out how development proposals can effectively 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>	2a
	<p>By supporting the effective implementation of circular economy principles in London's built environment (through the application of the Circular Economy Statement Guidance) – including the reuse and recycling of material found on-site and reducing the amount that is transported – 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>	2a
	<p>Negative</p> <p>No anticipated impacts</p>	

Group	<p style="text-align: center;">Potential impact description</p> <p>What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).</p>	<p>Relevant PSED (1, 2a, b or c, and 3)</p>
Disability	<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
	<p>As described above, effectively implementing circular economy principles and measures can contribute to reducing air pollution through the reduced transportation of material and waste.</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>Negative</p> <p>No anticipated impacts</p>	
Gender reassignment	<p>Positive</p> <p>No anticipated impacts</p>	

Group	<p style="text-align: center;">Potential impact description</p> <p>What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).</p>	<p>Relevant PSED (1, 2a, b or c, and 3)</p>
<p>Negative</p> <p>No anticipated impacts</p>		
<p>Marriage and civil partnership</p>	<p>Positive</p> <p>No anticipated impacts</p>	
	<p>Negative</p> <p>No anticipated impacts</p>	
<p>Pregnancy and maternity</p>	<p>Positive</p> <p>As described above, effectively implementing circular economy principles and measures can contribute to reducing air pollution. 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>2a</p>
	<p>Negative</p> <p>No anticipated impacts</p>	

Group	<p style="text-align: center;">Potential impact description</p> <p>What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).</p>	<p>Relevant PSED (1, 2a, b or c, and 3)</p>
Race	<p>Positive</p> <p>As described above, effectively implementing circular economy principles and measures can contribute to reducing air pollution. Research on air quality in London suggests that areas with higher proportions of Black, Asian and minority ethnic (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.</p>	2a
	<p>Negative</p> <p>No anticipated impacts</p>	
Religion or belief	<p>Positive</p> <p>No anticipated impacts</p>	
	<p>Negative</p> <p>No anticipated impacts</p>	

Group	<p style="text-align: center;">Potential impact description</p> <p>What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).</p>	<p>Relevant PSED (1, 2a, b or c, and 3)</p>
Sex	<p>Positive</p> <p>No anticipated impacts</p>	
	<p>Negative</p> <p>No anticipated impacts</p>	
Sexual orientation	<p>Positive</p> <p>No anticipated impacts</p>	
	<p>Negative</p> <p>No anticipated impacts</p>	
People on low incomes	<p>Positive</p> <p>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 reduce the transport of materials and therefore reduce the emission of harmful pollutants, it is likely that low-income groups will be positively impacted.</p>	2a

Group	Potential impact description What positive and negative impacts have been identified (known and potential) for particular groups? Refer to evidence (including engagement).	Relevant PSED (1, 2a, b or c, and 3)
Negative 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 income
Circular Economy Statements	+1	+1	No anticipated impacts	No anticipated impacts	+1	+1	No anticipated impacts	No anticipated impacts	No anticipated impacts	+1

Amendments to the guidance

(only for review to the EqIA in the future)

Change	Reason for change

What changes have you made to the guidance as a result of this EqIA?	Why have these changes been made?

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	No major change to the guidance is required This EqIA 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 EqIA 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 EqIA 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.

1.2 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.[Reference:1](#)

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.[Reference:2](#)

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.[Reference:3](#)

Gender reassignment

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

Marriage of 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.[Reference:4](#)

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.[Reference:5](#)

Religion or belief

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

Sex

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

Sexual orientation

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

None identified

1.3 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, however these groups will be engaged as part of the formal public consultation.

Engagement record

Engagement undertaken which is relevant to the EqIA 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

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References

- [Reference:1](#)Protecting Health in Europe from Climate Change, World Health Organisation, 2017.
- [Reference:2](#)Updated Analysis of Air Pollution in London, Aether, 2017.
- [Reference:3](#)Protecting Health in Europe from Climate Change, World Health Organisation, 2017.
- [Reference:4](#)Impact of London’s road traffic air and noise pollution on birth weight: retrospective population-based cohort study, British Medical Journal, 2017.
- [Reference:5](#)Updated Analysis of Air Pollution in London, Aether, 2017.