

**Supporting text for Just Space comments on the supplementary information on the EIA, as per Panel note 7.**

**Notes on three of the matrixes:**

1. EqIA Matrix for Policy H10 Existing Housing and Estate Regeneration

The assessments for this policy are totally inadequate.

For the three main topics – Equality and inclusion, Social integration and Health and health inequalities – the same text is used. The text is no more than a shorthand repeat of the policy and it fails to address any negative effects. The wording is effectively geared towards housing units, not people.

*The policy supports the regeneration of London's housing, to support higher density and high quality development. There is emphasis within the policy on delivering equivalent or higher densities to increase London's housing stock. The policy also encourages estate regeneration and where possible to deliver an uplift in affordable housing and re-providing appropriate tenure mixes. These factors are likely to promote a culture of equality, and social inclusion, especially for more vulnerable groups and those more likely to be impacted by poverty. The policy permits residents to participate in the process of regeneration.*

The phrase “where possible to deliver an uplift in affordable housing” supposes that in some cases the policy will NOT deliver an uplift. Yet the impacts of this on vulnerable groups are not considered, among which are:

- the loss of people's homes
- the reduction in the chance for low income groups to access affordable homes
- forced relocation leading to the break-up of communities
- the particular effect on the elderly of relocation
- the health effects of higher density housing, such as the effect on families of living in cramped conditions, inadequate light and access to green space

The assumption that the policy is “likely to promote a culture of equality” is a largely meaningless term, has no evidential basis and does not address the impact where the policy does NOT result in equality.

Under Social integration where it is says that those with protected characteristics are more likely to be affected by displacement, there is no group-by-group analysis of this, just a sentence saying the policy will “mitigate the potential displacement”. It does not assess the mitigation methods and its relevance to each group.

2. EqIA Matrix for Policy SD1 Opportunity Areas

The assessments for this policy are wholly inadequate and comprise no more than shorthand repeats of the policy, cut and pasted into several boxes, often hastily written, which largely fail to identify any negative effects.

The text does not give comfort that the policies were tested for Equality impact before they were written.

As in all the matrixes there is no analysis of the impacts group-by-group, simply a Yes or No as to whether a group would be affected. Many of these are questionable.

For example, why would the topics of Equality and inclusion, Health, and Social integration not be relevant to people in the 'Pregnancy and maternity' group? The clear impact of Opportunity Areas' is that they will displace existing communities *"there is the potential to disproportionately impact on existng [sic] congregations of ethnic or religious communities in opportunity areas where growth and regeneration can lead to the displacement of those communities."* (in topic1) This has a particular effect on families and is worse for pregnant mothers and those with small children.

Because the Opportunity Area policy does not carry out Social Impact Assessments and because the Mayor has not evaluated the impact of OA designation in OAs to date, there is a clear lack of evidence that the policy will for example *"reduce health inequalities and improve overall wellbeing"* yet this is the conclusion of the Health topic.

Furthermore in topic 10 Economic competitiveness and employment there is no assessment of the loss of employment from wholesale redevelopment (as for example in Old Kent Road OA) and the fact that the types of employment that get pushed aside are those connected to protected groups: low income and BAME communities, in particular.

### 3. EqIA Matrix for Policy D8 Tall Buildings

How can it be possible that topics on health, culture and air quality are considered Not Applicable under this policy?

The text states that tall buildings accommodate growth, encourage regeneration and *"can play a role in contributing to social inclusion, inclusive design and new opportunities for local communities."*

If this supposes that tall buildings have a social impact, then the EqIA is not complete without further consideration of the social impact, to include the negative social impact of major regeneration projects that tall buildings represent.

The above topics are relevant to protected groups in the following examples:

- Where tall buildings are built this may impact on particular the loss of cultural and community space. (Two examples I am familiar with: loss of Hackney Road Bingo Hall, used by low income older people; threat to Queens Market, Newham, a culturally-specific asset). Often in tall building development there is a direct loss of local cultural and community space, which it is not mandatory to replace. These spaces are often relied on and used by many of the protected groups eg old and young age groups, BAME groups, religious, low income, and more.
- The architecture of tall buildings, and the surroundings they demand, can be a threat to established culturally-specific local areas in London, leading to the loss of assets particular to certain groups, including protected groups. For example, Latin-American groups in the Elephant and Castle; Chinatown; Banglatown in Spitalfields.
- Reduction in air quality from construction pollution and congestion at ground level can be an impact of tall buildings and this affects the protected groups in particular, who are more vulnerable to poor air quality, such as the elderly. This effect is reflected in Air Quality topic 8: *“Reduce inequalities in access to clean air across London, particularly for those who live in deprived areas? who live, learn or work near busy roads or construction sites? who are more vulnerable because of their age or existing medical condition?”*
- Reduction in sunlight and green space can be a direct impact of tall buildings. Where there are already hardships suffered by protected groups these reductions will mean worse conditions, contrary to the Health topic aim to *“Reduce differentials in life expectancy and healthy life expectancy across London”*.

These *Not Applicable* boxes reveal the lack of a real Equalities impact assessment and an awareness of negative impacts of the policies.