

LONDON



TUNNELS



The London Tunnels

Equality Impact Assessment

April 2024

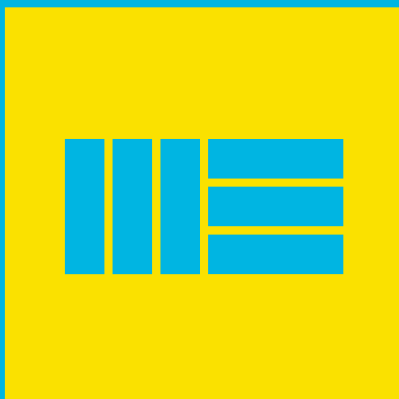


EQUALITY IMPACT ASSESSMENT

THE LONDON TUNNELS, 38-39, 40-41
FURNIVAL STREET, EC4A 1JQ AND
PART GROUND AND LOWER FLOOR 31-
33 HIGH HOLBORN, LONDON, WC1V
6AX

PREPARED ON BEHALF OF THE LONDON TUNNELS
PLC

30 APRIL 2024



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INTRODUCTION

- 1.1 This Equality Impact Assessment ('EqIA') has been prepared by Montagu Evans on behalf of The London Tunnels PLC ('the Applicant') in relation to a change of use of the existing buildings and tunnel complex ("the Proposals" / "Proposed Development" / "Scheme") at 38-39, 40-41 Furnival Street, London, EC4A 1JQ and part ground and lower floor 31-33 High Holborn, London, WC1V 6AX ("the Site" / "the Tunnels" / "the London Tunnels").
- 1.2 The description of development for this Application for full planning permission, is as follows:
- "Change of use of existing deep level tunnels (Sui Generis) to visitor and cultural attraction (F1 (b)(c)), including bar (Sui Generis); demolition and reconstruction of existing building at 38-39 Furnival Street; redevelopment of 40-41 Furnival Street, for the principal visitor attraction pedestrian entrance at ground floor, with retail at first and second floor levels and ancillary offices at third and fourth levels and excavation of additional basement levels; creation of new, pedestrian entrance at 31-33 High Holborn, to provide secondary visitor attraction entrance (including principle bar entrance); provision of ancillary cycle parking, substation, servicing and plant, and other associated works"*
- 1.3 The Site is located across the jurisdiction of two local planning authorities, the City of London ("CoL") and the London Borough of Camden ("LBC"), making it a 'cross-boundary' application. Identical planning applications have been submitted to both LPAs.
- 1.4 The City of London ('the Council / CoL'), has requested an EqIA be prepared to accompany this planning application. This report is also being submitted to the London Borough of Camden. This report includes the following sections:
- **Policy Context and Approach to Assessment** – summarising the key provisions of the Equality Act 2010, as well as regional and local planning policy, to establish the terms of reference for the assessment of potential equalities impacts.
 - **Baseline Context** – providing an overview of current land uses and a summary of key baseline data of relevance to the assessment.
 - **Impact Assessment** – identifying which of the protected characteristics prescribed within the Equality Act 2010 are likely to be of relevance in context of the Proposed Development and assessing any potential impacts on individuals and groups with one or more protected characteristics, with reference to proposed mitigation measures.
 - **Summary and Conclusions** – providing a narrative conclusion on the extent to which the Proposed Development is likely to have implications on any populations with protected characteristics in the local area.

ASSUMPTIONS AND LIMITATIONS

- 1.5 This Statement has been prepared based on desktop research only, and it has been informed by technical information presented within other reports submitted alongside this application, including the Statement of Community Involvement.

POLICY CONTEXT AND APPROACH TO ASSESSMENT

THE EQUALITY ACT 2010

2.1 The Equality Act 2010 ('the Act') came into force on 1 October 2010, bringing together and replacing all other previous discrimination legislation. The Act legally protects individuals from discrimination in the workplace and in wider society and promotes equality of opportunity for all. The Act sets out the following nine protected characteristics, which represent the grounds upon which discrimination is unlawful:

- Age;
- Disability;
- Gender reassignment;
- Marriage and civil partnership;
- Pregnancy and maternity;
- Race;
- Religion or belief;
- Sex; and
- Sexual orientation.

2.2 Part 11, Chapter 1, Section 149 of the Equality Act 2010, which came into force on 5 April 2011, relates to the Public Sector Equality Duty and places a statutory duty on Local Authorities, in the exercise of their functions, to have due regard to the need to:

- (a) "Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under [the Equality Act 2010];
- (b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- (c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it".

2.3 The Act continues that having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:

- (a) "Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
- (b) Take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
- (c) Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low".

REGIONAL POLICY

THE LONDON PLAN (2021)

- 2.4 The London Plan is the Spatial Development Strategy for Greater London and sets out a framework for how London will develop over the next 20 to 25 years, as well as the Mayor's vision for "*good growth*". Good growth, which is both socially and economically inclusive and environmentally sustainable, underpins the whole of the London Plan and each of its Policies. The London Plan proposes to take on a new approach for growth on the basis of its potential to improve the health and quality of life for all city residents, to reduce inequalities and to make the city a better place to live, work and visit.
- 2.5 The London Plan recognises that London is made up of diverse communities and that its neighbourhoods, schools, workplaces, parks, community centres and all the other times and places Londoners come together give the city its cultural character and create its future. Planning for "*good growth*" will require planning with these communities – both existing and new – to make new connections and erode inequalities.
- 2.6 To ensure London's growth is good, the London Plan is informed by six good growth objectives, which includes:
- **Policy GG1**, which relates to Building Strong and Inclusive Communities. Policy GG1 supports development that will assist in building on London's traditions of openness, diversity and equality and that helps to deliver strong and inclusive communities. In addition, Policy GG1 supports and promotes the creation of a London where all Londoners, including children and young people, older people, disabled people, and people with young children, as well as people with other protected characteristics, can move around with ease and enjoy the opportunities the city provides, creating a welcoming environment that everyone can use confidently, independently, and with choice and dignity, avoiding separation or segregation.
 - **Policy GG3** Creating a Healthy City, which states that in order to improve Londoners' health and reduce health inequalities, those involved in planning and development must ensure that the wider determinants of health are addressed in an integrated and co-ordinated way, taking a systematic approach to improving the mental and physical health of all Londoners and reducing health inequalities. Development must also seek to promote more active and healthy lives for all Londoners and enable them to make healthy choices, plan for appropriate health and care infrastructure to address the needs of London's changing and growing population and seek to improve London's air quality by reducing the exposure of the public to poor air quality and minimise inequalities in levels of exposure to air pollution. Policy GG3 also supports development that improves Londoners access to and the quality of green spaces, the provision of new green infrastructure, and spaces for play, recreation and sports.
- 2.7 The London Plan recognises that **growth and change have not always benefited Londoners equally** and that in some cases, the wrong sort of growth has led to established communities finding themselves priced out of the areas that they call home. Some parts of the city have not benefited from the advantages the growth of London provides, with too many areas in London still experiencing deprivation despite the wider success of the capital. To address this, the London Plan states at paragraph 2.0.7 that it is important that there is a strong focus on sustainable and inclusive regeneration, with Boroughs, the Mayor and other partners working closely with the local community to bring about the right sort of change and investment.
- 2.8 At paragraph 2.10.2 the London Plan states that **for regeneration initiatives to contribute towards achieving good growth, it is important that they tackle poverty, disadvantage, inequality and the causes of deprivation**, address social, economic and environmental barriers and benefit existing residents

and businesses in an area. The London Plan continues at paragraph 2.10.3 that to be effective in improving the lives of those most affected by inequality, **regeneration initiatives must be undertaken in collaboration with local communities**, involving a broad spectrum of groups, businesses and individuals, to develop a shared vision for the area.

INCLUSIVE LONDON: THE MAYOR'S EQUALITY, DIVERSITY AND INCLUSION STRATEGY (MAY 2018)

- 2.9 The Mayor's Equality, Diversity and Inclusion Strategy ('the Strategy') was published in May 2018 and sets out the Mayor's vision to create a truly inclusive London. The Strategy sets out how the Mayor will work to address a range of inequalities to help to create a fairer and more inclusive city, where all people feel welcome and can fulfil their potential. In November 2022 the Mayor published updated equality, diversity and inclusion strategy objectives to replace some of those originally published in the Strategy in 2018.
- 2.10 The Strategy includes 39 equality, diversity and inclusion objectives in total for change over a four year period to 2022 that seeks to ensure that London is:
- A great place to live;
 - A great place for young people;
 - A great place to work and do business;
 - Easy to get around;
 - A safe, healthy and enjoyable city; and
 - A city that leads by example.
- 2.11 Inclusive London builds on the Planning for Equality and Diversity in London Supplementary Planning Guidance (2007), which although now dated, highlights some of the key ways in which the spatial planning system can impact upon different groups in different ways. Some of the key issues affecting multiple groups include:
- Access to employment and training;
 - Access to appropriate housing;
 - Access to social facilities;
 - Encouraging multiculturalism in the provision of local services;
 - Deprivation; and
 - Access to health services.
- 2.12 These issues are among those factored into the assessment of potential impacts in Section 4.0 of this Statement.

LOCAL PLANNING POLICY

CITY OF LONDON LOCAL PLAN 2015

- 2.13 The City of London Local Plan 2015 sets out the City's vision, strategy, objectives and policies for planning the City of London. It sets out a spatial strategy for the area with a focus on sustainable growth, particularly focusing on economic growth to support the wider London and national economy.
- 2.14 The Vision for the City as set out in the Plan includes the recognition that though it is a safe place to live and work, there are concerns about anti-social behaviour and there is a need to address these concerns and maintain their attractive and accessible environment.

- 2.15 The Vision also sets out the challenge for City Communities, recognising that a range of business, workers, residents, students and visitors inhabit the City, each with different needs which are difficult to meet in such a small area. This section of the Plan also highlights how the health of residents is generally good, although health inequalities exist, with pockets of poor health in the Portsoken and Golden Lane areas in the east of the City. To address these inequalities and challenges the communities face, the Vision includes an aim to: increase the amount of open space; improve the quality of retail spaces; provide a mix of dwelling types; provide a network of high quality social and community facilities.
- 2.16 This Vision is then translated into a Strategic objective (5): *'To ensure the provision of inclusive facilities and services that meet the high expectations of the City's business, resident, student and visitor communities, aiming for continuous improvement in the City's rating in satisfaction and quality of life surveys'*.
- 2.17 **Core Strategic Policy CS22: Social Infrastructure and Opportunities** sets out that to maximise opportunities for the City's residential and working communities to access suitable health, social and educational facilities and opportunities, while fostering cohesive communities and healthy lifestyles, new development should maximise opportunities for delivering services for the City's communities, should provide adequate healthcare facilities and services for residents; and should protect and enhance existing facilities.
- 2.18 **Policy DM 10.1 New Development** sets out how all developments should be of a high standard and ensure that there is the highest standards of accessible and inclusive design. Paragraph 3.10.22 sets out that roof terraces and gardens should be publicly accessible where possible.
- 2.19 **Policy DM 10.8 Access and Inclusive Design** sets out how development should achieve an environment that meets the highest standards of accessibility and inclusive design, ensuring that the City is inclusive and safe for of all who wish to use it, regardless of disability, age, gender, ethnicity, faith or economic circumstance; convenient and welcoming with no disabling barriers, ensuring that everyone can experience independence without undue effort, separation or special treatment; and responsive to the needs of all users who visit, work or live in the City.
- 2.20 **Policy DM 11.3 Hotels** requires proposals for new hotel and apart-hotel accommodation to be inclusive and provide at least 10% of hotel rooms to wheelchair accessible standards to be given permission.

CAMDEN LOCAL PLAN (2017)

- 2.21 The Camden Local Plan (2017) sets out the Council's planning policies and sets out the Council's vision for the borough, through strategic objectives. These strategic objectives include creating the conditions for growth, to create secure, safe, socially mixed and balanced areas and strengthening Camden's nationally important economy, in terms of business and employment, the knowledge economy, shopping and entertainment, culture, entertainment and tourism.
- 2.22 *Policy C3 – Cultural and leisure facilities* highlights how cultural and leisure facilities contribute to Camden's attractiveness and that the council will seek opportunities for new cultural and leisure facilities.
- 2.23 The Camden Local Plan includes a focus on economic development and recognises that Camden as a borough has a successful economy, with 24,000 businesses and 300,000 jobs across a range of sectors. *Policy E1 – Economic Development* states that the council will support local enterprise development and will also encourage concentrations of creative and cultural businesses in the borough.

- 2.24 The creative industries are identified as a growth sector in the Local Plan, with a Creative and Cultural Industries Research Report and Action Plan (2009) finding that these types of businesses create around 40,000 jobs and have an annual gross turnover of about £1 billion in Camden alone.
- 2.25 *Policy E3 – Tourism* focuses on the contribution of tourism to the borough and recognises the importance of this, and in turn supports it in the borough. The policy states that the council expect new, large-scale tourism development and visitor accommodation to be in Central London, particularly the growth areas of King’s Cross, Euston, Tottenham Court Road and Holborn.

CITY OF LONDON EQUALITY OBJECTIVES

- 2.26 The City Corporation has set Equality Objectives for the period 2024-2029 which provide a dynamic framework for advancing their commitment to equity, equality, diversity and inclusion as an employer and service provider. These objectives also support the City Corporation to deliver their ‘Our Corporate Plan 2024-29’ and ‘People Strategy 2024-29’.
- 2.27 The objectives are as follows:
- Inclusive and Trustworthy Leadership - Committed to making systemic change through championing and advancing equity, equality, diversity and inclusion (EEDI) in a community of leaders;
 - Inclusive and Diverse Community - Representation and experience ensure the City Corporation is an employer of choice where people thrive;
 - Accessible and Excellent Services - Consideration of equity, equality, equality, diversity and inclusion is integral in the design, development, implementation and evaluation of services;
 - Socio-Economic Diversity - Someone’s socio-economic background should not limit their potential to flourish. Activities cognisant with the Social Mobility Index recommendations for improvement will be pursued; and
 - Cross-cutting activity: Evidence and Data - improving the robustness of equalities data to inform an evidenced based approach to advancing equality, equality, diversity and inclusion is essential.

CAMDEN EQUALITY OBJECTIVES

- 2.28 Camden Council recognise that the borough is one of the most diverse places in the country and that there are communities of people with different identities, pride, cultures, and abilities that are part of the neighbourhoods in London. They also recognise that there is stark inequality in the borough in terms of wealth.
- 2.29 Camden has an equality policy which sets out the council’s ambitious agenda to address the needs of people in the borough and their workforce who are faced with disadvantage or inequalities because of race, sex, disability, age, gender reassignment, marriage and civil partnership, pregnancy and maternity / paternity, sexual orientation, transgender, religion / belief. Through this policy, they commit to ensuring council services give satisfaction to all; council policies and methods don’t have any unintended adverse impacts; and that the council’s workforce is representative at all levels.

2.30 The council also set up an Equality Taskforce which aimed at exploring the council's role in challenging inequality in Camden. The taskforce explored how local public services could help tackle inequality in the borough, taking a fresh look at what influences inequality locally and exploring how it could best be tackled.

ASSESSMENT METHODOLOGY

2.31 The Equality Act 2010 does not contain specific guidance on how an Equality Impact Assessment or an equality analysis should be conducted, however, the City of London have published an Equality Toolkit, which provides a robust framework for determining potential equality effects.

2.32 The toolkit recommends that an evidence base is first assembled to demonstrate an understanding of the local situation in relation to the protected characteristics. This can include specific engagement where proportionate to do so, however in the case of an individual development project, where extensive public consultation has already occurred, a desktop review of key findings from this prior engagement activity can be considered to be sufficient.

2.33 A series of questions are then posed to identify the types and magnitude of potential impact.

2.34 The questions which are relevant to assessing the implications of development projects are summarised below:

- How many people is the proposal likely to affect?
- How significant is its impact?
- Does it relate to an area where there are known inequalities?
- What kind of equality impact might there be?
- Is the impact positive or negative or is there a mix of both?
- On which elements/aims of the Equality Duty will this impact be?
- Can any negative impact be justified?

2.35 Finally, the toolkit identifies four potential outcomes/courses of action arising from the assessment:

- **Outcome 1:** No major change required when the assessment has not identified any potential for discrimination or adverse impact and all opportunities to advance equality have been taken.
- **Outcome 2:** Adjustments to remove barriers identified by the assessment or to better advance equality.
- **Outcome 3:** Continue despite having identified some potential for adverse impacts or missed opportunities to advance equality. In this case, the justification should be included in the assessment and should be in line with the duty to have 'due regard'. You should consider whether there are sufficient plans to reduce the negative impact and/or plans to monitor the actual impact.
- **Outcome 4:** Stop and rethink when an assessment shows actual or potential unlawful discrimination.

BASELINE INFORMATION

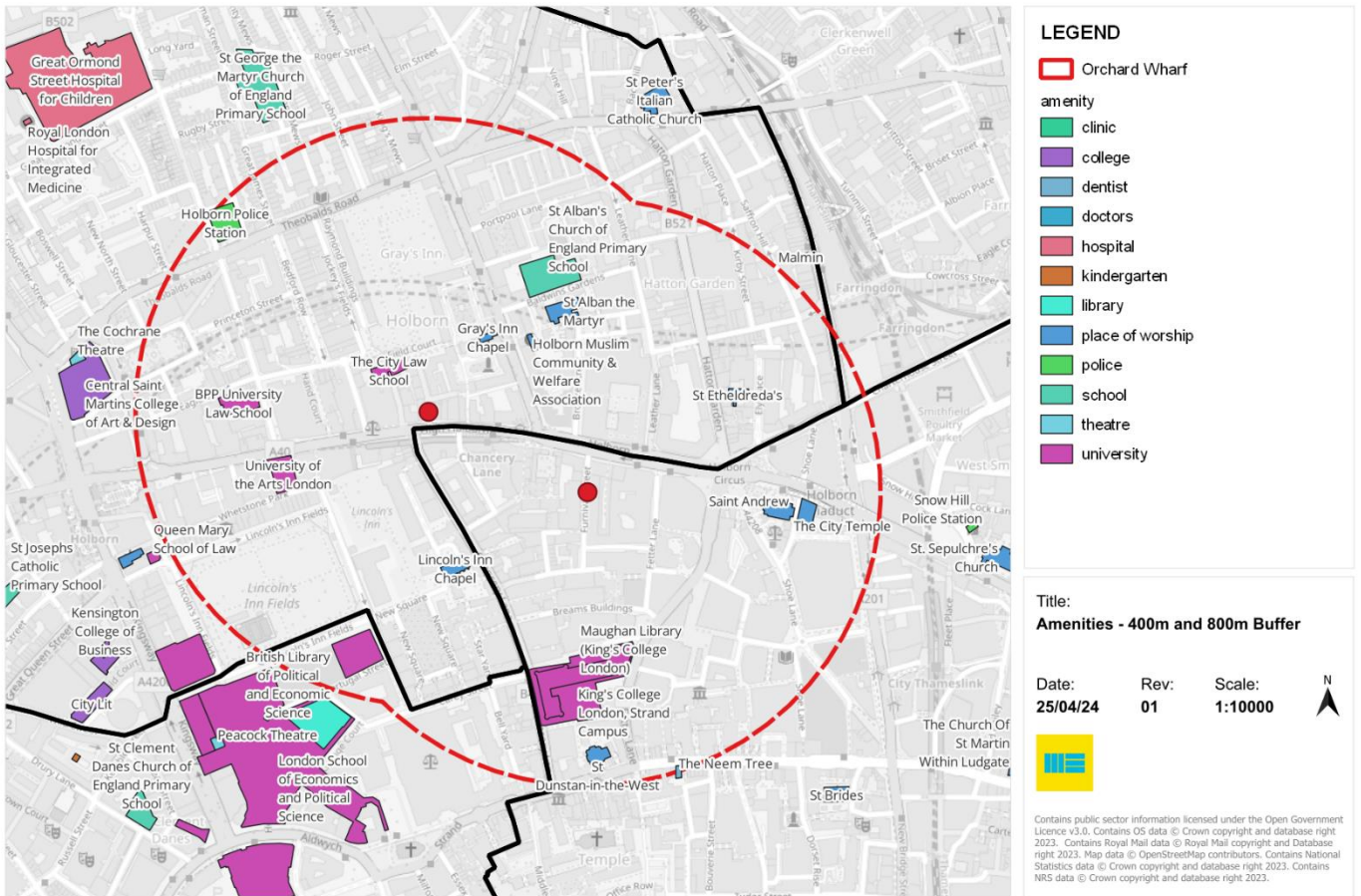
CURRENT LAND USES AND COMMUNITY FACILITIES

- 3.1 The Site currently comprises three above ground buildings including where specified lower ground floor elements and a network of subterranean tunnels.
- 3.2 A variety of community facilities and social infrastructure are located within relatively close proximity to the Site, including the following facilities within 400m:

Infrastructure Type	Within 400m
Education	<ul style="list-style-type: none"> ○ St Alban's Church of England Primary School ○ The City Law School ○ BPP University Law School ○ University of the Arts London ○ Kings College London (Strand Campus) ○ London School of Economics
Health	<ul style="list-style-type: none"> ○ None within 400m
Community and Culture	<ul style="list-style-type: none"> ○ Holborn Police Station
Places of Worship	<ul style="list-style-type: none"> ○ St Etheldreda's ○ Saint Andrew ○ The City Temple ○ St Dunstan-in-the-West ○ Lincoln's Inn Chapel ○ Gray's Inn Chapel ○ St Alban the Martyr ○ Holborn Muslim Community & Welfare Association

- 3.3 Figure 1 overleaf show the locations of this social infrastructure.

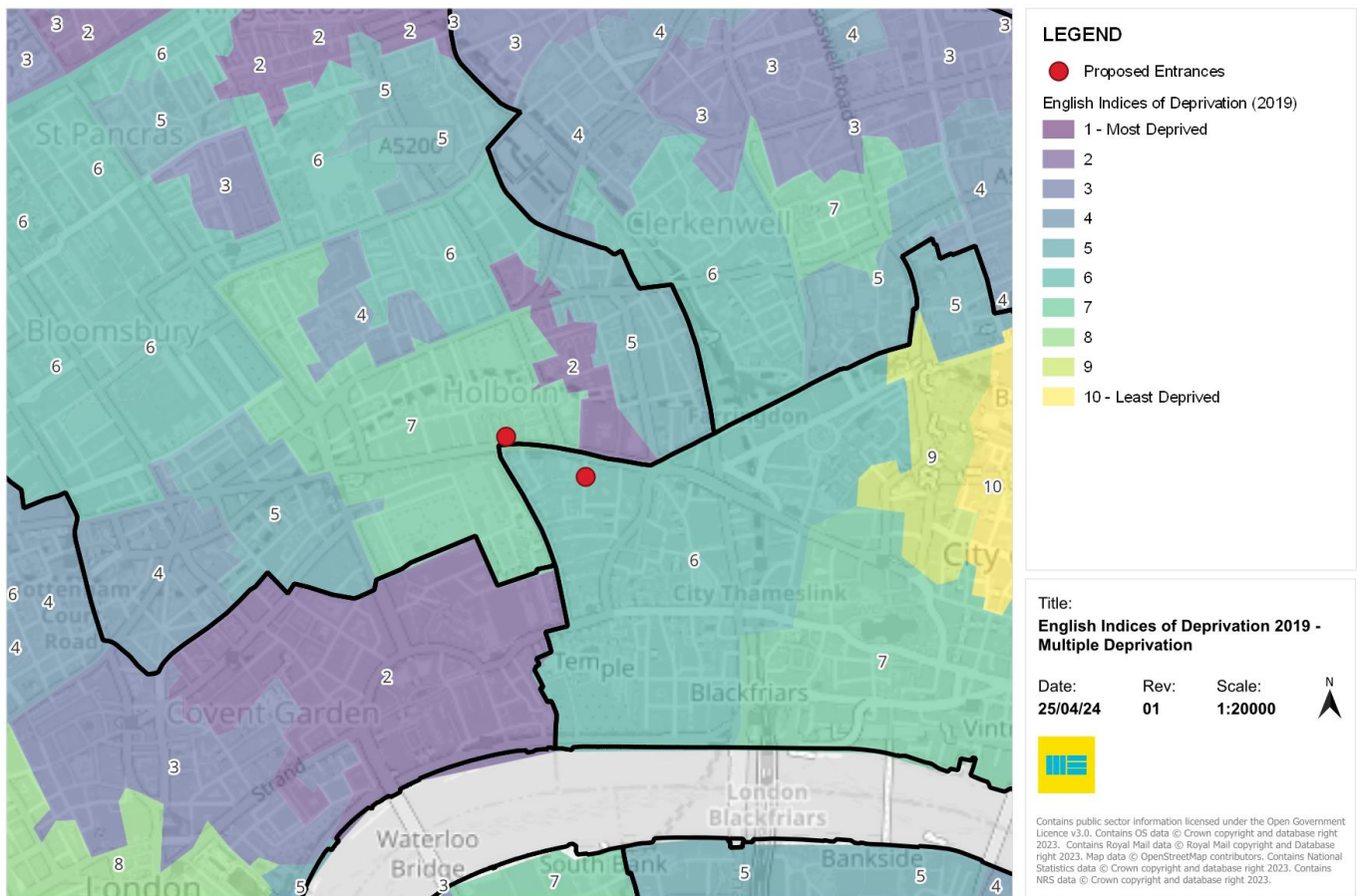
Figure 1 - Local Amenities



LOCAL RESIDENT POPULATION – PROTECTED CHARACTERISTICS

3.4 Tackling spatial inequality and meeting the wide-ranging needs of a mixed and diverse resident population are key components of the London Plan. Figure 1 below shows spatial patterns of deprivation within the City of London, based on the English Indices of Deprivation 2019.

Figure 2 – Deprivation within the local area



Source: DLUHC, English Indices of Deprivation 2019

- 3.5 As demonstrated above, the immediate area is not deprived, although there is deprivation to the South and North - North East.
- 3.6 The table below summarises CoL and Camden's ranking nationally (out of 317 local authority areas) for each of the seven main domains which make up the Index of Multiple Deprivation. Cells are highlighted to showcase where the borough is in the top 10% deprived nationally. As noted below, the City of London is among the most deprived 10% of areas nationally for Barriers to Housing and Services and Living Environment, with the latter two owing largely to the lack of available housing (and the relative unaffordability of this housing) and owing to the relatively poor air quality and high levels of road traffic accidents due to its central urban location. The borough is significantly less deprived across Income, Employment, Education, Health, and Crime.
- 3.7 Camden is generally more deprived than the City of London, though, performing worse across all domains of deprivation except for Barriers to Housing and Living Environment, likely due to housing in the borough being more affordable than CoL. Camden is only within the top 10% deprived nationally across Living Environment, owing largely to relatively poor air quality and high levels of road traffic accidents due to its central urban location.

Table 1 – Deprivation in the CoL (EIoD, 2019)

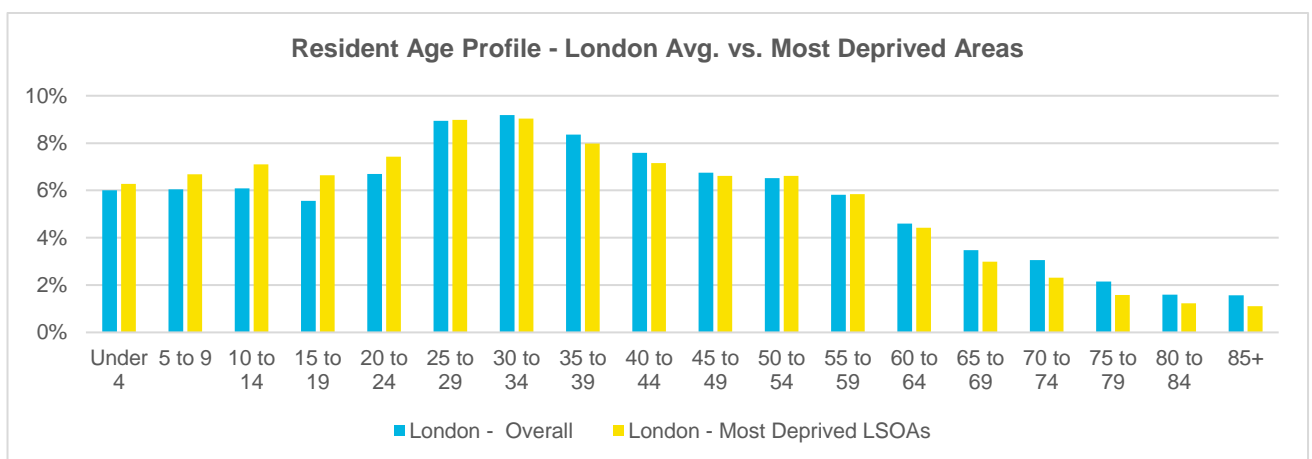
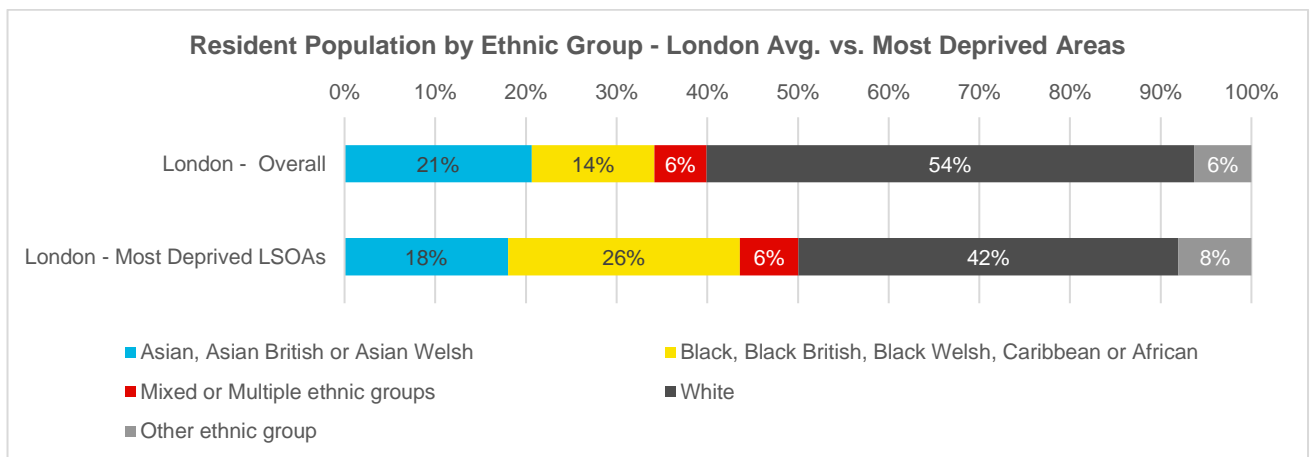
DOMAIN OF DEPRIVATION	CITY OF LONDON (WITHIN ENGLAND)	CAMDEN (WITHIN ENGLAND)
Income	292	87
Employment	286	151
Education, Skills and Training	314	274
Health Deprivation and Disability	247	207

DOMAIN OF DEPRIVATION	CITY OF LONDON (WITHIN ENGLAND)	CAMDEN (WITHIN ENGLAND)
Crime	317	70
Barriers to Housing and Services	10	132
Living Environment	10	22
IMD OVERALL	208	132

Source: DLUHC, English Indices of Deprivation; Red highlight = among 10% most deprived Local Authority Districts nationally

- 3.8 Overall, the City of London ranks 208th of 317 local authority areas nationally and Camden ranks 132nd - within the top 60% least deprived nationally, and top 50% most deprived nationally respectively.
- 3.9 Though Deprivation is not a protected characteristic under the 2010 Act, there are strong intersectionalities between deprivation and protected characteristics – for example between Ethnic Group and deprivation (those belonging to Black ethnic groups account for 26% of the population of the most deprived LSOAs, but just 14% of London’s population as a whole) and between Children and Young People and deprivation (34% of the population of the most deprived LSOAs is under 25, compared with 30% of London’s total population).

Figure 3 - Examples of Intersectionality between Protected Characteristics and Deprivation



Source: Census 2021 / English Indices of Deprivation 2019

- 3.10 Table 2 overleaf summarises the presence of residents with relevant protected characteristics in the City of London compared to London and England averages.

Table 2 – Protected Characteristics of Local Residents

	City of London	Camden	Greater London	England
Total Population (2021 Census)	8,583	210,136	8,799,729	56,490,050
Sex				
% Male	55.0%	47.3%	48.5%	49.0%
% Female	45.0%	52.7%	51.5%	51.0%
Age				
Age 0-4	2.6%	4.8%	6.0%	5.4%
Age 5-15	4.3%	10.6%	13.3%	13.1%
Age 16-17	0.8%	2.0%	2.3%	2.3%
Age 18-24	12.5%	13.2%	8.8%	8.3%
Age 25-44	40.8%	35.1%	34.1%	26.6%
Age 45-64	25.1%	22.5%	23.7%	25.8%
Age 65-79	10.7%	8.7%	8.7%	13.5%
Age 80+	3.0%	2.8%	3.2%	5.0%
Disability				
Disabled under the Equality Act: Day-to-day activities limited a lot	3.3%	6.7%	5.7%	7.3%
Disabled under the Equality Act: Day-to-day activities limited a little	7.4%	8.5%	7.5%	10.0%
Not disabled under the Equality Act: Has long term physical or mental health condition but day-to-day activities are not limited	7.6%	5.7%	5.2%	6.8%
Not disabled under the Equality Act: No long term physical or mental health conditions	81.7%	79.1%	81.5%	75.9%
Ethnic Group				
Asian, Asian British or Asian Welsh	16.8%	18.1%	20.7%	9.6%
Black, Black British, Black Welsh, Caribbean or African	2.7%	9.0%	13.5%	4.2%
Mixed or Multiple ethnic groups	5.5%	6.6%	5.7%	3.0%
White	69.4%	59.5%	53.8%	81.0%
Other ethnic group	5.6%	6.8%	6.3%	2.2%
Religion				
No religion	43.8%	34.6%	27.1%	36.7%
Christian	34.7%	31.4%	40.7%	46.3%
Buddhist	1.1%	1.1%	0.9%	0.5%
Hindu	2.4%	1.9%	5.1%	1.8%
Jewish	2.1%	4.8%	1.7%	0.5%
Muslim	6.3%	16.1%	15.0%	6.7%
Sikh	0.1%	0.2%	1.6%	0.9%
Other religion	0.6%	0.9%	1.0%	0.6%
Not answered	8.9%	8.9%	7.0%	6.0%
Sexual Orientation		210,136		

	City of London	Camden	Greater London	England
Straight or Heterosexual	79.3%	82.6%	86.2%	89.4%
Gay or Lesbian	7.6%	3.7%	2.2%	1.5%
Bisexual	2.3%	2.5%	1.5%	1.3%
All other sexual orientations	0.4%	0.7%	0.5%	0.3%
Not answered	10.4%	10.5%	9.5%	7.5%
Gender Identity*				
Gender identity the same as sex registered at birth	92.1%	91.0%	93.5%	91.2%
Gender identity different from sex registered at birth	0.1%	0.3%	0.2%	0.5%
Not answered	7.4%	8.2%	6.0%	7.9%
Marriage or Civil Partnership				
Never married and never registered a civil partnership	57.4%	55.7%	37.9%	46.2%
Married or in a registered civil partnership	30.4%	31.3%	44.7%	40.0%
Separated, but still legally married or still legally in a civil partnership	2.1%	2.2%	2.2%	2.3%
Divorced or civil partnership dissolved	7.0%	7.4%	9.1%	7.3%
Widowed or surviving civil partnership partner	3.0%	3.4%	6.1%	4.2%

*Taylor v Jaguar Land Rover established that Gender Identity is protected through the Gender Reassignment protected characteristic in the 2010 Act.

Source: ONS, Census 2021

Red = Significantly lower proportion than Greater London Average

Yellow = In line with Greater London Average (+/- 1 percentage point)

Green = Significantly higher proportion than Greater London Average

3.11 Compared against the Greater London Average, the City of London:

- Has a greater proportion of young adults, particularly those aged between 18-24;
- Has significantly lower proportions of children;
- Has a lower proportion of residents with disabilities which affect their daily activities a lot, but higher proportions with physical or mental health conditions which fall outside of the Equality act and do not affect their day-to-day activities;
- Has a higher proportion of White residents and a correspondingly lower proportion of Asian and Black residents in particular;
- Has higher proportions of residents with no religion;
- Has higher proportions of Gay or Lesbian residents;
- Has fewer residents with their gender identity the same as their sex registered at birth; and
- Has a higher proportion of residents who have never been married or in a registered civil partnership.

3.12 Compared against the Greater London Average, Camden:

- Has a greater proportion of working age population, particularly those aged between 18-64;
- Has significantly lower proportions of children;
- Has a greater proportion of residents who are classed as Disabled within the Act and whose daily activities are limited a little or a lot;
- Has a lower proportion of residents who are not Disabled under the Act with no long term physical or mental health conditions;
- Has a higher proportion of White residents and a correspondingly lower proportion of Asian and Black residents in particular;
- Has higher proportions of residents with no religion as well as higher proportions of Jewish and Muslim residents;
- Has higher proportions of Gay, Lesbian or Bisexual residents;
- Has fewer residents with their gender identity the same as their sex registered at birth; and
- Has a higher proportion of residents who have never been married or in a registered civil partnership.

3.13 Data on pregnancy and maternity is not available at a local level; the population aged 0 to 4, however, provides an insight into the size of the infant population in both boroughs, which in turn can serve as a proxy for the prevalence of pregnancy and maternity locally (on the basis that birth rates tend to change relatively slowly over time). As noted above, there is a much lower proportion of 0-4s than the London and national average in both boroughs.

3.14 Specific data on Gender Reassignment (i.e. those who have been through or are due to go through Gender Reassignment) is not available, however as noted in Table 2, Taylor v Jaguar Land Rover established that

Gender Identity forms part of the Gender Reassignment protected characteristic, and data on this topic has been presented and discussed above.

SUMMARY

- 3.15 A number of community facilities are located within relatively close proximity to the Site, though none are located immediately adjacent to the site boundary, and few are therefore likely to be impacted directly in any significant way. Though areas to the south and north of the Site are relatively deprived, the immediate local area (i.e. within a 400m buffer of the Site Boundary) demonstrates relatively low proportions of residents with protected characteristics compared with Greater London average, indicating that the local population is likely to be less sensitive to change. Nevertheless, it will be important to ensure that any potential opportunities for adverse differential or disproportionate impacts are duly mitigated, and this is explored in further detail in the next section.

POTENTIAL IMPACTS

- 4.1 This section considers the extent to which groups of people with one or protected characteristics are likely to be disproportionately or differentially affected if the City of London and Camden both resolve to grant planning consent for the Proposed Development.

COMMUNITY FEEDBACK ON PROPOSALS

- 4.2 A detailed account of engagement and consultation activities undertaken in support of the Proposed Development can be found within the Statement of Community Involvement report, which has been submitted with this application.
- 4.3 A range of consultation activities were undertaken by the Applicant from September – October 2023, which included in-person consultation events, preview events with local residents and ward councillors, as well as wider engagement with the public via a public consultation website, social media campaign and flyer drop.
- 4.4 In total, 222 surveys were filled out online and in-person by those interested in the project, along with a further 48 emails and call received through the project's dedicated consultation feedback mechanisms.
- 4.5 Feedback received via the public consultation was overwhelmingly positive, with 99% of call survey responses either positive or neutral about the plans and 47% comments overall demonstrating active support for the Proposals, the most frequent comment received.
- 4.6 Key themes shared this process of engagement included:
- 4.6.1 Retaining and preserving the historic value of the Tunnels
 - 4.6.2 Support of the Tunnels as a unique local attraction
 - 4.6.3 The need for the Tunnels to be accessible (both physically and in terms of a price point)
 - 4.6.4 How construction associated with the proposed development would impact local traffic and what the potential noise impacts could be
- 4.7 The Applicant has sought to respond positively to feedback throughout the consultation process and to enable consultees to help shape the proposals. It is notable that the nature of comments received left little for the Applicant to respond to by way of material changes to the planning application and therefore, in the SCI, the applicant has sought to clarify its response to the main themes arising from the feedback.

LIKELY IMPACTS ARISING FROM THE PROPOSED DEVELOPMENT

HOW MANY PEOPLE IS THE PROPOSAL LIKELY TO AFFECT?

- 4.8 The proposal is likely to affect those who will ultimately work and visit the Tunnels – with the Tunnels able to accommodate 2 million visitors every year. This is in addition to those who live and/or work within the local area. As shown in Table 2, there is a relatively large resident population - 8,583 as of the 2021 Census in the City of

London and 210,136 within Camden – meaning the proposed development has the ability to impact a large population.

DOES THE PROPOSAL RELATE TO AN AREA WHERE THERE ARE KNOWN INEQUALITIES

- 4.9 There are a number of known inequalities at the Greater London level which impact disproportionately upon people with protected characteristics. Of particular relevance to the Proposed Development is Deprivation, with the City being classed as particularly deprived across two indices, Barriers to Housing and Living Environment and Camden being particularly deprived across Living Environment. As shown in Figure 6, Deprivation intersects with both Age and Ethnicity, with younger people (particularly children) and people from minority ethnic backgrounds over-represented in London's most deprived LSOAs (when compared against Greater London average). On this basis, the employment-generating developments such as the Proposed Development could disproportionately benefit people with these protected characteristics.
- 4.10 Groups most likely to be sensitive to changes in their physical environment, such as older people (who are more likely to have reduced mobility), children (who are more sensitive to changes in air quality) and people with disabilities (who may also have reduced mobility and/or increased sensitivity to changes in air quality) were found to be under-represented within the local area (see Table 2) compared with Greater London average, though it remains important to ensure that any potentially adverse impacts are duly mitigated.

WHAT KIND OF EQUALITY IMPACT MIGHT THERE BE, AND HOW SIGNIFICANT ARE THESE IMPACTS LIKELY TO BE?

- 4.11 The following impacts have the potential to be experienced differentially or disproportionately by those with one or more protected characteristics.
- 4.12 Potential impacts during the construction phase include the following:
- **Air Quality and Noise** – construction activity can be noisy, create dust, and have short term impacts on air quality within a given local area unless suitable mitigation measures are put in place.
 - **Transport and Access** – construction projects require frequent deliveries of materials to site, in addition to construction workforce commuting. The increased presence of HGVs and other site traffic can also create safety issues for pedestrians and cyclists – and again risks must be sufficiently mitigated.
 - **Temporary Employment** – construction activity also creates employment, and for major schemes such as the Proposed Development this can be significant. Lack of good jobs can often be a root cause of deprivation, meaning that job creation can help to address issues such as these.
 - **Training and Skills** – the construction industry has a long tradition of apprenticeships, and major projects such as the Proposed Development are likely to create opportunities for young people and other groups under-represented in the labour market to build a career in construction and related sectors.
- 4.13 Potential impacts during the operational phase include the following:
- **Permanent Employment** – on completion, the Proposed Development will greatly increase the number of jobs sustained on site.
 - **Open Space** – the Proposed Development also includes a number of public realm improvements across the Site, some of which will be publicly accessible.

- **Accessibility** – of open space and completed buildings.

4.14 Table 3 below explores the potential impacts described above in context of the nine protected characteristics.

Table 3 – Assessment of Significance of Identified Potential Effects

Potential Impact	Relevant Protected Characteristics	Nature of Impact	Commentary and Mitigation / Enhancement Measures	Residual Impact
Demolition / Construction Phase				
Air Quality and Noise	Age (Older People and Young Children) Disability (Those with Long Term Health and Mobility Issues)	Negative	<p>Air and noise pollution associated with construction are harmful to all ages but especially to children, as they can cause chronic health conditions including emphysema, asthma, heart conditions, sleep conditions and psycho-physiological effects. Poor air quality and noise can also exacerbate poor health conditions in older adults.</p> <p>Poor air quality and noise impacts associated with the construction of the proposed development will therefore disproportionately affect the Study Area's younger residents including children and infants, and its older residents.</p> <p>The Site is located in an area where air quality is mainly influenced by emissions from road transport. The A40 is immediately adjacent and to the north of Site, with several smaller roads near to the Site. The Proposed Development is likely to affect road traffic movements on the local road network which in turn would affect ambient pollutant levels in the surrounding areas (through a change in exhaust related emissions).</p> <p>During the construction processes, control procedures will be put in place to minimise noise, vibration and dust pollution and roads will be kept clean. An Outline Construction Management Plan, prepared by WSP, has been submitted as part of the planning application and sets out further detail of the proposed control procedures.</p> <p>A Noise and Vibration Impact Assessment, prepared by WSP, has been submitted as part of the planning application and sets out further detail of the potential control procedures for minimising noise pollution.</p>	Neutral
Transport and Access	Age (Older People and Young Children) Disability (Those with Long Term Health and Mobility Issues) Pregnancy and Maternity (Parents with Babies and Young Children)	Negative	<p>The Site itself (the Tunnels) is currently inaccessible to the public, with pedestrians able to travel next to the Site on Furnival Street and Fulwood Place.</p> <p>The Site is currently serviced by the A40 which is immediately to the north of the Site and Furnival Street and Fulwood Place on which the Site is located.</p> <p>Traffic associated with construction can cause delays to pedestrian and cyclist journeys in this already busy area of London.</p> <p>A Transport Assessment undertaken by WSP has been submitted as part of this planning application which sets out the active transport assessment and transport impact assessment associated with the proposed development and suitable mitigations.</p> <p>An Outline Construction Traffic Management Plan has also been prepared by WSP which sets out the potential impacts and proposed mitigation.</p>	Neutral
Temporary Employment	Age (Working Age Population) Deprivation (residents of areas suffering from employment)	Positive	<p>The construction of the proposed development will provide new, temporary employment opportunities as outlined in the Socio-Economics and Health chapter of the EIA – estimated at 1,570 construction jobs over the construction period.</p> <p>On the basis that having secure job and a good income are key to tackling deprivation in all its forms, and the analysis showing young people are disproportionately affected by deprivation, the Proposed</p>	Positive

	and/or income deprivation)		Development is likely to have a positive impact on London's young adult population in particular.	
Training and Skills	Age (Young people, working age population) Deprivation (residents of areas suffering from employment, income and education and skills deprivation)	Positive	Working aged people are more likely to require accessible work and training than children and older people, especially those working-aged people who also have children or other caring responsibilities. As working aged residents make up most of the Study Area population, they will be disproportionately impacted by a lack of accessible work and training in the area, or by disruptions to their commutes. The construction of the proposed development is projected to create around 1,570 construction jobs as discussed above and the Applicant has committed to maximising opportunities to support local jobs and apprenticeships through working with Camden and the City of London to advertise job opportunities locally and plan for future jobs and training, as well as hosting at least eight work experience placements a year for local schools.	Positive
Operational Phase				
Permanent Employment	Age (Working Age Population) Deprivation (residents of areas suffering from employment and/or income deprivation)	Positive	The proposed development will bring the Site into a more productive use, sustaining a large number of tourism related jobs. The Socioeconomic assessment submitted as part of this application estimates that the Proposed Development would support approximately 105 jobs, equivalent to 85 FTE roles. These jobs will be split across Admin/management, Operations and Bar roles which will cater to a range of skill levels. On the basis that having secure job and a good income are key to tackling deprivation in all its forms, and the analysis showing young people and people from minority ethnic backgrounds are disproportionately affected by deprivation, the Proposed Development is likely to have a positive impact on local residents with protected characteristics.	Positive
Open Space Provision	Age (Working Age Population) Disability (Those with Long Term Health and Mobility Issues) Pregnancy and Maternity (Parents with Babies and Young Children)	Neutral	Access to open space and nature is important for all ages but especially for young people, as patterns of childhood physical activity are key determinants of adult behaviours which help to improve physical and mental health and social cohesion. Accessible open space is also important for people with disabilities and those who are pregnant or have children. A lack of accessible open and natural space will disproportionately affect the Study Area's younger, disabled, or pregnant residents. There is no open or natural space currently on site. The proposed development includes improvements to the local environment, including replacing and upgrading the immediate public realm and opening up public access to the tunnels. The Proposed Development and includes a roof top terrace providing open space, with greenery, for staff.	Positive
Accessibility of Open Space and Buildings	Age (Working Age Population) Disability (Those with Long Term Health and Mobility Issues) Pregnancy and Maternity (Parents with Babies and Young Children)	Positive	It is important that buildings and open space is accessible and conforms to regulations to ensure that those who have disabilities, those who are pregnant and those who are young or who are older are able to access opportunities within these buildings. The existing tunnel networking is not accessible. The Proposed Development will create a public accessible visitor attraction. The Proposed Development has been designed to be fully accessible. The Access Strategy (contained with the Design and Access Statement) prepared by David Bonnett Associates sets out in detail how the Proposed Development is welcoming, safe and accessible for all.	Positive

COULD ANY IDENTIFIED IMPACTS CONSTITUTE UNLAWFUL DISCRIMINATION?

4.15 None of the impacts identified in Table 3 are likely to constitute unlawful discrimination.

SUMMARY

4.16 As demonstrated above, the Proposed Development is not expected to have any negative impacts on local residents, workers or visitors with protected characteristics. By contrast, some residents of London with protected characteristics could benefit from the employment to be sustained on the site – which will particularly benefit those living in London’s most deprived areas.

CONCLUSION

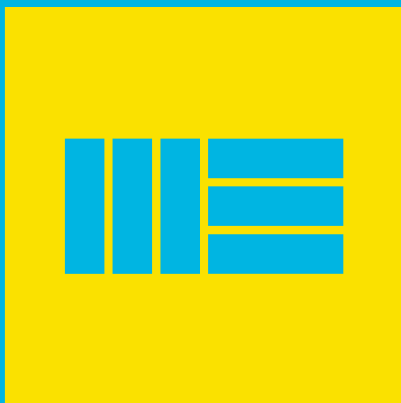
The Proposed Development is not expected to negatively impact on people with protected characteristics – including those living nearby, visitors to the local area or workers based on Site. Conversely, the enabling of employment to be sustained and intensified on site will have a beneficial impact on those living in deprived areas in particular – which includes disproportionate numbers of people from minority ethnic groups and young people aged under 25.

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