

Equalities Impact Assessment

Camden Council

What is an Equality Impact Assessment?

An Equality Impact Assessment (“EqulA”) is a way of analysing a proposed organisational policy or decision to assess its effect on people with protected characteristics covered by the Equality Act 2010*. To meet the Council’s statutory duty the EqulA should also address issues of advancing opportunities and fostering good relations between different groups in the community.

The Council has a strong tradition of ensuring equality both in terms of service delivery and within its workforce. To help us maintain this tradition it is essential that you start to think about the EqulA process before you develop any new activity or make changes to an existing activity. This is because the EqulA needs to be integral to service improvement rather than an ‘add-on’. If equality analysis is done at the end of a process it will often be too late for changes to be made.

The courts place significant weight on the existence of some form of documentary evidence of compliance with the Public Sector Equality Duty* when determining judicial review cases. Having an EqulA as part of the report which goes to the decision makers and making reference to the EqulA within that report helps to demonstrate that we have considered our public sector equality duty and given “due regard” to the effects the decision will have on different groups.

The EqulA must be considered at an early stage of the formation of a policy/decision and inform its development, rather than being added on at the end of the process. The EqulA form should be completed and updated as the policy / decision progresses and reviewed after the policy or change has been implemented.

If a staff restructure of organisational change is identified as necessary following the review of an activity then an EqulA needs to be completed for both stages of the process, i.e. one when the activity is reviewed and one when the restructure or organisational change is undertaken.

Please note all sections must be completed. However the obligation is to have due regard and it may be that while an issue requires the completion of an EqulA, the matters at hand may not lend themselves to some of the obligations, for example fostering good relations. As long as this has been properly considered it is legitimate to conclude that this cannot be applied in a particular case.

*Please read the notes at the end of this document.

Name of proposed decision/policy being reviewed:

West End Lane to Finchley Road – Principles for a new place (Draft SPD)

Question 1

What is changing and why?

If the issue is going for decision, e.g. at Cabinet meeting, what are the decision makers being asked to decide? If you are reviewing a policy what are its main aims? How will these changes affect people?

What is changing and why?

Camden Council has prepared the West End Lane to Finchley Road draft planning guidance which, following public consultation, is intended to be adopted as a Supplementary Planning Document (SPD) on 24th September 2021.

The focus of this planning guidance is the land and sites stretching from Finchley Road town centre to the east through Blackburn Road to West End Lane. This includes the O2 Centre, its associated car parking, Homebase retail store and neighbouring car showroom sites where there are substantial opportunities for redevelopment and improvement.

Landsec, the O2 Centre and Homebase site owners, are planning to bring forward comprehensive development proposals for this significant area. The owners of other sites on Blackburn Road are also at different stages in considering future redevelopment options.

With significant redevelopment being considered, it was decided to bring forward complementary planning guidance to support and guide the opportunities for a comprehensive and integrated approach to proposals that could deliver a range of public benefits and local improvements.

These benefits should help to meet:

- 1) The Camden Plan and 2025 aspirations and objectives including:
 - Making growth genuinely inclusive and building communities that are mixed with well-designed homes and infrastructure;
 - Making Camden open, accessible and attractive for everyone;
 - Promoting green spaces, streets, housing estates and other public spaces are clean, attractive and safe;
 - Helping to ensure no one experiences poor health as a result of the air that they breathe and walking, cycling and public transport will be the easiest and best ways to get around the Borough;
 - Creating the conditions that support good health and tackle health inequalities, including the walkable neighbourhoods, environments and facilities; and
 - Making Camden the best place to do business and to work by delivering high-quality, flexible and affordable workspaces suitable for growth sectors and changing patterns of employment.
- 2) The Camden Local Plan (2017) identifies the West Hampstead Interchange area as a

growth area (Policy G1). Strategic Objective 6 of the plan is to promote and support the successful development of growth areas and to ensure that development is supported by necessary infrastructure and maximises the opportunities and benefits for local and surrounding communities.

The Local Plan supports development that makes the best use of land and makes housing the priority land use. Growth areas are identified as the locations where most significant development will be expected and the plan expects developments in the West Hampstead area to contribute to:

- A mix of uses, including substantial new housing (including affordable housing), town centre, employment and community uses, and green/open space (with any substantial new town centre uses located within the designated Finchley Road/ Swiss Cottage town centre part of the growth area);
 - Improved transport interchange accessibility and capacity and improved pedestrian and bicycle movement and routes;
 - A substantially improved street environment around transport facilities, including improved crossing and wider pavements;
 - Sustainable and safe design of the highest quality that respects the character and heritage value of West Hampstead.
- 3) Aspirations of the Fortune Green and West Hampstead Neighbourhood Plan (2015) in relation to the O2 Centre site and its immediate surroundings.

The plan promotes the West Hampstead Growth Area for a mix of uses, including new housing, employment, town centre and public/community uses (Policy 4) and sets out priorities for development across the area. The plan also includes more detailed considerations for specific sites, including the O2 Centre site, where it recognises the opportunities for significant redevelopment, and sites on Blackburn Road. The plan also called on the Council to prepare a masterplan for the growth area and consult on proposals to improve Blackburn Road. The land and sites subject of this SPD sit within the growth and neighbourhood area.

- 4) The Council's currently adopted Site Allocations Development Plan Document (2013). This includes guidance for the O2 Centre car park (Site 29), which supports a housing led redevelopment and includes other expectations, most of which are still broadly relevant. A new Site Allocations Local Plan (SALP) proposes updated objectives for development across the growth area and more site specific development requirements for the O2 Centre and car park, car showrooms site and 13 Blackburn Road. Following public consultation in early 2020, where a significant number of responses were received about the West Hampstead area, further consultation on an updated version is planned for later in 2021. With the statutory processes involved, including formal examination, the new SALP is unlikely to be adopted before summer 2022.
- 5) The new London Plan (2020) policies which are underpinned by the "Good Growth" agenda with a strong focus on economic growth, supporting more inclusive and balanced communities and addressing health inequalities. It identifies the Swiss Cottage/Finchley Road town centre as having high residential growth potential and, with West Hampstead town centre, forms part of an identified strategic area for regeneration. In these areas development proposals should contribute to regeneration by tackling inequalities and the environmental, economic and social barriers that affect the lives of people. The plan's "Urban Greening" and "Healthy Streets" objectives focus on creating more inclusive and healthier environments and delivering the design quality and patterns of land use and measures, where more trips happen by foot, cycle or public transport.

In view of the proposals emerging in the area covered the SPD is intended to identify some key issues and opportunities that need to be addressed by the schemes that come

forward as planning applications and establish some key planning principles to support and guide future development and area improvements

What are the decision makers being asked to decide?

The Council approved a draft West End Lane to Finchley Road Supplementary Planning Document (SPD) on 15th January 2021 for formal consultation to start in February 2021.

Following consultation which ended on 6th April, responses were considered and the draft SPD revised to respond to the feedback received. A consultation feedback report has been separately produced. It is anticipated that the Council will adopt the final version of the SPD in autumn 2021.

What are the main aims and how will the changes affect people?

The SPD provides area based planning guidance based on existing adopted policies and priorities

It does not create new policies, but seeks to set out in more detail how policies in the Local Plan and other relevant Development Plan policies might be implemented. The guidance is based on Council policies in the adopted Local Plan which was itself subject of an Equalities Impact Assessment (EquIA) which identified that the plan would have broadly positive impacts.

The SPD does not in itself authorise or propose specific development schemes in the area, which will come forward through relevant landowners and other agencies and decisions on related planning applications. It acts as a guide for planning and decision-making alongside other plans and policies for development proposals. These proposals will have their own consultation processes and require more detailed assessments of their impacts socially, economically and environmentally.

The SPD is centred around making far more effective and sustainable use of land, particularly for new housing and affordable housing; improving connectivity and the public realm; with supporting social infrastructure and new greener places, these have informed the guidance's vision and the following four main themes:

- **A New Place** - guiding the principles of a new mixed use neighbourhood with its own distinct character; that integrates with existing neighbourhoods and town centres.
- **A Different Pace** - guiding the principles for a more connected place; where greater priority is given to walking and cycling in a more accessible and inclusive place
- **A Mix of Spaces** – guiding the principles for a greener and more environmentally friendly place; with new open spaces serving different functions for different age groups
- **A Sustainable and Resilient Place** - guiding the principles for a greener and more environmentally friendly place; with innovative measures to reduce environmental impacts.

The SPD aims to ensure that new development can contribute positively to improving the area from which local communities can share the benefits. It aims to promote mixed, balanced and sustainable communities, and well planned and designed development and improvements and should be positive in terms of its potential impacts in guiding future development.

Notes to Question 1

- Summarise briefly and precisely just what the decision is about. In particular

what changes will happen if this decision is agreed and put into effect?
What happens now and what will happen in the future? What will be different?

- **Do not cut and paste the report or policy** but concisely restate it, considering equalities issues directly against the facts
- **Focus on the impacts on people** e.g. the users of any facility or service.

DRAFT

Question 2

Who will be affected by this decision and how?

In particular do those from protected groups benefit or will they experience specific and disproportionate impacts? Will there be any direct or indirect discrimination?

Who will be affected by this decision and how?

Planning policies and guidance may have disproportionate (both positive and negative) effects for people with protected characteristics (because of age, a disability, gender reassignment, marriage/civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation). For example, some groups of people with protected characteristics may be more likely to spend more time in an area through the day and benefit from policies or guidance which seek to improve the built environment and promote improvements to address issues such as accessibility, open spaces and safety.

New development may also have both negative and positive impacts such as the potential loss, replacement or delivery of uses such as shops and community facilities; types of new employment space and housing, and their affordability; accessibility of jobs; and possible environmental impacts such as noise and disruption through construction and new uses.

Where development is expected to lead to an increase in an area's population, S106 planning obligations can be used to secure a range of measures and funding to address the impacts of development and possible additional demands on local services or facilities. This can provide benefits for existing local communities. Local people can also identify and prioritise local projects for funding using the Community Infrastructure Levy (CIL), a charge applied to most types of major development.

Socio economic profile of groups with protected characteristics

In order to assess the potential impacts of the SPD, an assessment of the population and potentially affected groups is needed. The adoption of the SPD will be particularly relevant to local existing and future communities of the area including residents, businesses and visitors.

As the findings from the March 2021 census is expected to be published in March 2022, most of the data in this EquIA is from the previous Census carried out in 2011. Since the Census was conducted, the Indices of Deprivation 2019 and GLA 2019 – based population projections (by borough and ward) have been published.

A principle aspect of this EquIA is to have an understanding of the proportions of residents with protected characteristics potentially to be affected and a good indication of this can still be achieved from the 2011 Census data.

The SPD Area

The SPD area sits within West Hampstead ward; with Fortune Green ward to the north, Frognaal and Fitzjohns ward to the east and Swiss Cottage ward to the south.

Plan of the West End Lane to Finchley Road SPD area



Population Overview

Table 1: GLA 2019 – based population projections – LB Camden

Ward Name	2011	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031
Ward population Summary: Persons												
Fortune Green	11,760	13,821	13,749	13,645	13,578	13,519	13,513	13,512	13,546	13,580	13,632	13,626
Frognal and Fitzjohns	11,979	15,245	15,124	15,014	14,932	14,872	14,860	14,893	14,954	14,985	14,973	14,934
Swiss Cottage	12,877	16,288	16,189	16,203	16,230	16,283	16,334	16,349	16,362	16,372	16,404	16,403
West Hampstead	12,059	15,474	15,379	15,322	15,388	15,525	15,685	16,058	16,392	16,711	17,003	17,259
Camden (sum of wards)	48,675	60,828	60,442	60,185	60,128	60,199	60,392	60,811	61,254	61,648	62,012	62,222
Camden (Borough wide)	220,087	264,122	262,705	262,230	262,568	263,628	265,389	267,784	270,842	273,677	276,406	279,203

Key Findings: change 2021-2031 (Source: Strategy and Change 2020)

There is a borough wide projected population growth of + 5.7% during the period 2021- 2031. However, population growth for West Hampstead ward is expected to increase by + 11.5%. There is a marginal projected population growth for Swiss Cottage ward (+ 0.7%) and projected marginal decline for Fortune Green ward (-1.3%) and Frognal and Fitzjohns ward (-2%).

Borough wide the largest change would be in the 65 + age group, + 11,900 (+34.6%). The working age population is projected to increase by + 8,400 (+ 4.3%) and children under 16 decrease by -5,200 (-15.1%).

Decreasing births are forecast borough wide in the medium-term to 2031, but increasing in the longer-term. Camden has one of the lowest fertility rates in the country.

Increasing number of deaths are forecast borough wide, reflecting an ageing population, plus the short-term effect of Covid-19.

Covid-19 Pandemic in the United Kingdom

The ongoing Covid-19 pandemic spread to the UK in late January 2020.

There have been more than seven million confirmed cases of coronavirus in the UK and more than 134,000 people have died within 28 days of testing positive for coronavirus).

So far, 89% of people aged 16 and over in the UK have had their first dose of a coronavirus vaccine and more than 80% have had their second. (*Gov.uk dashboard-10 September 2021*). Research suggests that getting vaccinated does not stop the spread of Covid-19 but could reduce the severity of the illness. Covid-19 vaccines have been recommended by the Government for young people aged 12 to 15.

Covid-19 in Camden: (Source Camden Covid-19 Dashboard):

- The total number of new cases in week 36 (30th August – 5th September 2021) was 536, this is up by 40 since the previous week.
- The weekly incidence rate (new cases) per 100,000 population for the latest week is 192, an increase from the previous week (week 35)
- As of 23rd August, a total of 334 deaths in Camden have been Covid-19 related. There has been 3 Covid-19 related deaths in the latest week of data.
- As of the 11th September, 155,466 of Camden residents have received at least their first dose of vaccine.
- London's R number as of the 10th September was 0.8 to 1.1. This means on average every 10 people infected will infect between 8 and 11 other people. If the R value is above 1 the pandemic is growing, if it is below 1 the pandemic is shrinking.

Prior to receiving the vaccine, older adults and people of any age who had serious underlying medical conditions like heart or lung disease, or diabetes were at higher risk of developing more serious complications or die from Covid-19. Covid-19 had disproportionately impacted the health and mortality of Black, Asian and Minority Ethnic communities more than those from a White British background.

Covid-19 is continuing to have a significant impact on the economy, which had seen an increase in unemployment, especially affecting young adults and those working in hospitality. Since lockdown measures were eased Britain's economy and job market has begun to stabilise.

According to a June 2020 survey carried out by YoungMinds.org.uk 74% of teachers and school staff agreed that schools being closed to most students as a result of lockdown measures had a significant impact on education and mental health of young people.

A June 2020 report on Coronavirus and the social impacts of Great Britain by the Office for National Statistics found that more than two-thirds of adults in the UK (69%) report felt somewhat or very worried about the effect Covid-19 was having on their life. The most common issues affecting wellbeing were worry about the future (63%), feeling stressed or anxious (56%) and feeling bored (49%).

The June 2020 [Institute for Fiscal Studies on the effects of the first two months of lockdown and social distancing during the Covid-19 pandemic in the UK](#) found that, taking account of pre-pandemic trajectories, mental health worsened substantially (by 8.1% on average) as a result of the pandemic. Groups had not been equally impacted and young adults, women and people with poor mental health pre-pandemic were more affected.

The health, social and economic impacts of the Covid-19 pandemic has and is likely to continue to have disproportionate impacts to particular groups, which are described further in this section

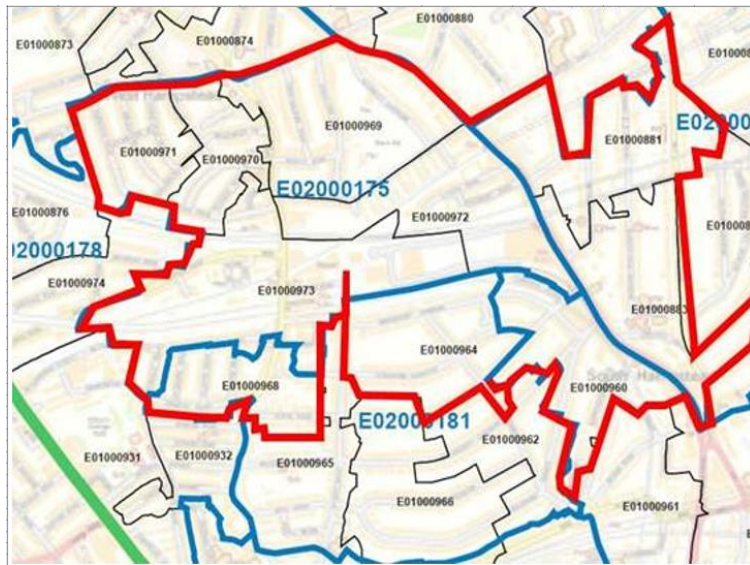
of the EquIA.

Deprivation and Lower Super Output Areas

The Indices of Deprivation 2019 provides a set of relative measures of deprivation for small areas (Lower Super Output Areas - LSOAs) across England. The domains of deprivation measured include income, employment, education, skills and training, health and disability, crime, barriers to housing and services and living environment deprivation.

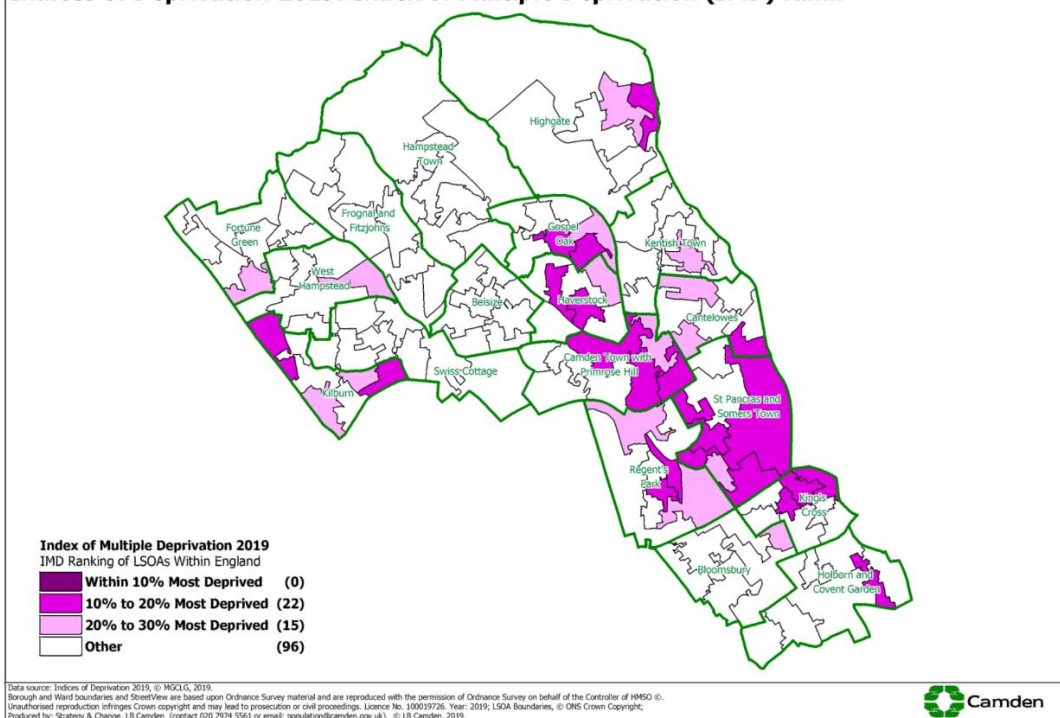
The combination of LSOAs that most closely correspond around the SPD area have been used to obtain demographic statistics for this EquIA (highlighted in red below). As this area is larger than the SPD area it is referred to as SPD+.

Combination of Lower Super Output Areas (LSOAs)



The most deprived LSOA locally, ranked within the 20%-30% most deprived in England, is LSOA E01000972 to the east of the SPD area including the main Council and housing association accommodation in the wider area analysed. The other LSOAs included are not ranked below the 30% most deprived in England and generally do not indicate signs of significant deprivation.

Indices of Deprivation 2019: Index of Multiple Deprivation (IMD) Rank



There are relatively few residents living within the SPD area, as it mainly comprises commercial and retail uses and an extensive car park bordered by railways. The Nido student housing block provides accommodation for up to 327 students and is located to the west of the SPD area.

Home Ownership

Table 1: Housing Accommodation– Census 2011

Housing Tenure	SPD Area+	SPD Area+ %	Camden Average
All People	16,540		
Area (hectares)	130		
Owned / part owned	2,688	34.2%	32.9%
Owned outright	1,327	16.9%	17.1%
Owned-mortgage or loan	1,330	16.9%	17.1%
Shared ownership	31	0.4%	0.7%
Social rented	1,481	18.8%	33.1%
Council social rented	836	10.6%	23.0%
Other social rented	645	8.2%	10.1%
Private rented	3,565	45.4%	32.2%
Private landlord / letting agency	3,456	44.0%	30.5%
Other private rented	109	1.4%	1.8%
Living rent free	127	1.6%	1.8%

The proportion of residents who own or part own their homes in the SPD Area + (34.2%) is marginally higher than the borough wide average of 32.9%.

There is a significantly lower proportion of social rented residents in the SPD Area + (18.8%) compared to the borough wide proportion of 33.1%. In addition, less than half of the proportion of social rented residents rent their homes from the Council (10.6%) compared to the borough wide average of 23.0%.

The proportion of private rent residents in the SPD Area + (45.4%) is significantly larger than the Camden average of 32.2%. Almost all of this proportion are rented by private landlords or letting

agencies.

Table 2: Housing and Accommodation – Census 2011

Household Spaces	SPD Area+	SPD Area+ %	Camden Average
All People	16,540		
Area (hectares)	130		
Whole house or bungalow	1,018	12.5%	14.8%
Detached	133	1.6%	1.9%
Semi-detached	256	3.1%	4.1%
Terraced (incl. end terrace)	629	7.7%	8.8%
Flat, maisonette or apartment	7,145	87.5%	85.2%
Purpose-built block of flats or tenement	3,364	41.2%	52.3%
Converted/shared house (inc bed-sits)	3,555	43.5%	29.8%
In a commercial building	226	2.8%	3.1%
Caravan, mobile or other temporary structure	2	0.0%	0.1%

A significant majority of residential properties in the SPD Area + are flats, maisonettes or apartments (87.5%) and this is marginally higher than the borough wide proportion of 85.2%. There are however a significantly larger proportion of converted / shared houses - including bed-sits, (43.5%) in the SPD Area + than the borough wide proportion of 29.8%. The proportion of purpose-built blocks of flats or tenement blocks in the SPD Area + (41.2%) is noticeably less than the Camden average of 52.3%.

Overcrowding

Table 3: Housing and Accommodation - Census 2011

Household Spaces	SPD Area+	SPD Area+ %	Camden Average
All People	16,540		
Area (hectares)	130		
Occupancy rating (rooms) of – 1 or less	2,365	30.1%	32.5%

Almost a third of housing in Camden (32.5%) is overcrowded and has an occupancy rating of -1 which implies that a household has one fewer room or bedroom than required by the household. The occupancy rating (rooms of -1 or less) for the SPD Area + (30.1%), which although significant, is marginally less than the borough wide proportion of 32.5%.

Groups with protected characteristics

The information on groups with protected characteristics below provides a context for who could be affected by a future decision to adopt the SPD. The protected group characteristics comprise the following: Sex; Age; Race; Religion/Belief; Disability/Long-term illness: Sexual Orientation; Gender reassignment; Pregnancy and Maternity; Marriage and Civil Partnership.

Sex

Table 4: Sex - Census 2011

Sex	SPD Area+	SPD Area+ %	Camden Average
All People	16,540		
Area (hectares)	130		
Male	7,989	48.3%	49%
Female	8,551	51.7%	51.0%

The proportion of male (48.3%) to female (51.7%) residents is virtually the same as the borough wide proportion (Male 49% / Female 51%).

Age

Table 5: Age, Census 2011

Age	SPD Area+	SPD Area+ %	Camden Average
All People	16,540		
Area (hectares)	130		
0-4	980	5.9%	6.0%
5-15	1,344	8.1%	10.1%
16-29	4,286	25.9%	26.6%
30-44	5,573	33.7%	27.0%
45-59	2,182	13.2%	15.2%
60-74	1,513	9.1%	10.1%
75-89	577	3.5%	4.5%
90+	85	0.5%	0.5%

The age profile of local residents is broadly in line with the borough wide profile at the time of the last Census. Residents aged 16-29 (25.9%) and 30-44 (33.7%) are proportionally the largest age groups in the SPD Area + which is significantly higher than other age groups.

All residents aged 16-74 fall within the economically active age bracket and make up 81.9% of the total population in the SPD Area + which is marginally higher than the Camden average of 78.9%.

The proportion of residents aged 75 and over (4%) is marginally smaller than the Camden average of (5%).

Prior to vaccination older adults and people of any age who had serious underlying medical conditions like heart or lung disease or diabetes were at higher risk of developing more serious complications and die from Covid-19 illness. Although the vaccination programme appears to be successful in the UK, there will continue to be a need for services, communities and community groups to provide extra care and support to vulnerable older people as Covid-19 has significantly impacted these groups.

In terms of facilities for different age groups, there is one age specific service within the SPD area (Gymboree Play and Music), located in the O2 Centre and which provides classes for newborns to under 5s.

There are three primary schools close to the SPD area. These are Emmanuel Church of England(CofE) Primary School, for children aged 3 to 11, located north-west of the SPD area; Kingsgate Primary school, for children aged 3 to 11, located on two sites south-west and west of the SPD area; and Holy Trinity CofE Primary School to the south. South Hampstead High School is an independent school for girls aged 4 to 18, located on two sites east and south- east of the SPD

area. Serving wider catchments, the nearest secondary school is the UCL Academy in Swiss Cottage. Other secondary schools in the north-west of the borough include Hampstead and Haverstock secondary schools. With local train links, William Ellis, Parliament Hill and La Sainte Union are located close to Gospel Oak.

The last school place planning report in [2019 \(at Camden Primary and Secondary School Places Planning Reporting | Open Data Portal\)](#), based on population projections and projected future new housing, identified that sufficient future capacity exists in both primary and secondary sectors. It highlighted that Kingsgate Primary School has one form entry of unused provision and that there is unused capacity in secondary schools.

There are three local community centres all of which are located relatively close to the SPD area and provide services to all age groups including younger and older people.

Sidings Community Centre is located outside of the SPD area to the west and has an early years service (0-4 years), Play and Sports Service (5-11 years) and a youth project (11-19 years). The community centre also provides an adult education service and runs over 50s activities.

JW3 is a Jewish community centre, outside of the SPD area to the north and describes itself as a vibrant cross-communal hub for Jewish arts, culture, family programming, social action, learning and more, where everyone is welcome.

The Winch community centre to the south east and closer to Swiss Cottage station, provides services to families, children (4-12), young people (11-19) and young adults (19-25). Two other community centres; West Hampstead and Kingsgate, also lie further west of the SPD area.

Alongside the crèche and play facilities provided for very young children, the O2 Centre includes community space available to be used for activities such as dance and exercise classes and a smaller meeting space. Further community space is planned to be provided as part of the redevelopment at 156 West End Lane. Evolving proposals for the comprehensive redevelopment of the O2 Centre, car park and adjacent sites include proposals to provide (as yet unspecified) community facilities.

Spring Grove is a purpose built care home situated approximately 400 metres to the north of the SPD area on Finchley Road and registered to provide care for up to 46 residents. The care home has a specialised dementia care unit and residents can participate in daily supervised activities.

The nearest NHS GP/health facilities to the SPD area are West Hampstead Medical Centre, Daleham Gardens Surgery and Swiss Cottage GP hub. As part of the reorganisation of boroughwide mental health services Camden and Islington NHS Foundation Trust have previously identified a need for a new facilities hub in the north-west of the borough. The evolving proposals for the comprehensive redevelopment of the O2 Centre, car park and adjacent sites includes proposals to provide (as yet unspecified) health facilities.

Race

Table 6: Race, 2011 Census

Race	SPD Area + No	SPD Area+ %	Camden Average
All People	16,540		
Area (hectares)	130		
All ethnic groups	16,540	100%	100%
White	11,479	69.4%	66.3%
Mixed/Multiple Ethnic Groups	921	5.6%	5.6%
Asian or Asian British	2,551	15.4%	16.1%
Black or Black British	1,010	6.1%	8.2%
Other Ethnic Group	579	3.5%	3.8%
British & Minority Ethnic Groups	5,061	30.6%	33.7%
All Minority Ethnic Groups	9,437	57.1%	56.0%
White			
English/Welsh/Scottish/Northern Irish/British	7,103	42.9%	44.0%
Irish	514	3.1%	3.2%
Gypsy or Irish Traveller	12	0.1%	0.1%
Other White	3,850	23.3%	19.0%
Mixed / Multiple Ethnic Groups			
White and Black Caribbean	163	1.0%	1.1%
White and Black African	138	0.8%	0.8%
White and Asian	295	1.8%	1.8%
Other Mixed	325	2.0%	1.9%
Asian / Asian British			
Indian	640	3.9%	2.8%
Pakistani	195	1.2%	0.7%
Bangladeshi	380	2.3%	5.7%
Chinese	441	2.7%	2.9%
Other Asian	895	5.4%	4.0%
Black / African / Caribbean / Black British			
African	566	3.4%	4.9%
Caribbean	271	1.6%	1.6%
Other Black	173	1.0%	1.7%
Other Ethnic Group			
Arab	188	1.1%	1.6%
Any other ethnic group	391	2.4%	2.3%

Most residents in the SPD Area + are White (69.4%), and the majority of White residents (42.9%) are English/Welsh/Scottish/Northern Irish/British. The proportion of White residents is marginally higher than the borough wide proportion of 66.3% of which 44% are English/Welsh/Scottish/Northern Irish/British. Other White residents in the SPD Area + (23.3%), many of whom will not have English as a first language, is marginally higher than the Camden

profile of 19%.

The second largest ethnic group locally are Asian or Asian British residents (15.4%), which is marginally lower than the borough wide proportion of 16.1%. Chinese residents make up the largest proportion of Asian / Asian British residents in the SPD Area + (2.7%) which is marginally lower than the 2.9% borough wide proportion. Bangladeshi residents make up the second largest proportion of Asian or Asian British residents in the SPD Area + (2.3%) and is significantly lower than the 5.7% borough wide proportion.

Residents who are Black or Black British are the third largest ethnic group locally (6.1%) which is noticeably lower than the borough wide proportion of 8.2%. Most residents who are Black or Black British in the SPD area + are of African descent (3.4%) which is lower than the borough wide proportion of 4.9%.

Covid 19 Pandemic and Race

Public Health England published a report (June 2020) entitled 'Understanding the impact of COVID-19 on Black, Asian and Minority Ethnic Groups' highlighting that Black and Asian minority ethnic communities are disproportionately affected by the disease and were significantly more likely to develop more severe complications or die with COVID-19 than people from a White British background.

Kevin Fenton (London's regional director for Public Health England) wrote in the organisation's 'Public Health Matter' blog on 3rd February 2021 about tackling London's ongoing Covid-19 health inequalities.

This mentioned that recent analysis by Public Health England London revealed that ethnicity continues to be a major factor in the health outcomes of communities during the second wave of the pandemic. Deprivation is also a key factor.

Compared to White Londoners, Black Londoners and Asian Londoners were up to three times more likely to die of Covid 19 in the first wave. In the second wave Black Londoners and Asian Londoners were up to 1.7 more likely to die of Covid-19 compared to White Londoners. Since the start of 2021 a higher proportion of cases were identified in Black and Asian communities when compared to White communities.

According to the Office for National Statistics a large proportion of the difference in the risk of Covid-19 mortality between ethnic groups can be explained by demographic, geographical and socioeconomic factors, including home location and occupation.

The blog mentioned that much has been achieved in London in terms of scaling up community testing, key worker testing, local contact tracing, helping staff in the transport network to be as safe as possible, as well as efforts from London Boroughs to help vulnerable people and those who need to self-isolate. Kevin Fenton mentioned that he is regularly speaking to faith leaders and community forums across London about vaccine hesitancy and how to engage people in a culturally competent way. National government is also keenly focused on the issue.

Local organisations providing services to ethnic minority groups

Camden Somali Cultural Centre is located close to the SPD area to the South West and provides advice and advocacy; supplementary classes for Somali children of primary and secondary school age; health sessions for women and mother and toddler groups. The Centre also promotes healthy living workshops, social care support, a translation service and consultancy / brokerage for organisations wanting to work with the Somali community for the benefit of the community. Innovative projects to engage Somalis with the wider community and mainstream services advice and advocacy.

Ethiopian Community in Britain is located just outside of the SPD area to the north and provides information, advice, advocacy, and referral services on housing, benefits, health, education, training and employment opportunities. The organisation also provides basic support, holds outreach, a social club and leisure activities for older people.

Meretz UK is a membership led organisation that is part of the worldwide Meretz Movement. It is described as representing a platform of Social Democracy, Civil Libertarianism, Green Environmental Issues, Progressive Labour Zionism, Peace and at times Secularism (although it defends rights of Jewish religious women for example). The Meretz UK office is based just outside of the SPD area to the south in Broadhurst Gardens

SPaRC (formerly known as St Pancras Refugee Centre) is now based in Swiss Cottage but reaches out to the surrounding area. SPaRC is an open and welcoming space for refugees, asylum seekers and migrants to meet and socialise. The organization runs activities including art, music therapy and walking groups as well as a place to socialise and have a free hot meal. The organisation gives some help with contacting services such as GPs, energy companies or the Job Centre.

Odu-Dua Housing Association provides quality affordable accommodation for black and ethnic minority people living in North London. Odu-Dua Housing Association is the landlord of some homes in the Lithos Road Estate (just outside of the SPD area to the north). The estate consists of 165 flats and houses, owned by Clarion Housing, Notting Hill Genesis and Odu-Dua Housing Association. Odu-Dua has taken on the duty to provide the estate services at Lithos Road on behalf of the three landlords.

Information about JW3 (Jewish Community Centre) is provided in the section Religion / Beliefs

Religion / Belief

Table 7: Religion or Belief, 2011 Census

Faith	SPD Area+ No	SPD Area+ %	Camden Average
All People	16,540		
Area (hectares)	130		
Christian	5,636	34.1%	38.5%
Buddhist	272	1.6%	1.4%
Hindu	322	1.9%	1.6%
Jewish	1,176	7.1%	5.1%
Muslim	1,429	8.6%	13.8%
Sikh	45	0.3%	0.2%
Other religion	121	0.7%	0.6%
No religion	4,214	25.5%	29.1%
Religion not stated	3,325	20.1%	9.6%

Most residents in the SPD Area + are of Christian faith (34.1%) and the proportion is marginally lower than the Camden average (38.5%). This is followed by not having a religion (25.5%) which is also marginally lower than the borough wide profile of 29.1%. The Muslim faith is the second most practiced religion locally (8.6%), which is significantly lower than the borough wide profile of 13.8%. The Jewish faith is the third most practiced locally 7.1% which is higher than the borough wide profile of 5.1%.

JW3 is the first and only Jewish Community Centre and arts venue of its kind to exist in the UK and is located near to the area of focus, to the north. JW3's vision is for a vibrant, diverse, unified

British-Jewish community, inspired by and engaged with Jewish arts, culture, learning and life.

JW3' mission is to increase the quality, variety and volume of Jewish conversation in London and beyond. JW3 seeks to achieve this by offering multiple entry points into Jewish life, culture and community for the widest possible range of people; and programming outstanding events, activities, classes and courses.

There are three churches close to the SPD area; St Thomas North Church, the Lighthouse to the east and St James Church of England to the South West.

The nearest places of worship and education services to Muslims are Qalam (Ialsmi) Education Resource Centre and Kilburn and Hampstead Islamic Centre. These are located outside of the SPD area, to the south west, on Kilburn High Road.

Disability / long term illness

Table 8: Disability and Long Term Illness - 2011 Census

Economically Inactive: Long term sick or disabled	SPD Area+ No	SPD Area+ %	Camden Average
All People	16,540		
Area (hectares)	130		
All Men aged 16-74	216	3.3%	4.8%
All Women aged 16 - 74	231	3.3%	4.0%

The proportion of residents in the SPD Area+ who are economically inactive due to long term sickness or disability (3.3% Men / 3.3% Women), is marginally lower than the borough wide proportion (4.8% Men / 4.0% Women).

Lithos Road supported Living Scheme (also known as Hornbeam House) is close to the SPD area, to the north, and provides a housing scheme for five service users with learning difficulties.

Lifeline 4 Kids is a charity based in West End Lane and provides equipment to help improve the quality of life for children with disabilities.

Sexual orientation

Data on sexual orientation is not available for the SPD area alone.

The 2018 GP Patient Survey found that 9.3% of Camden residents surveyed identified as Lesbian, Gay, Bisexual or 'Other' – above the London average (5.7%) and the national rate (3.5%). This compares with figures from the 2017 Annual Population Survey that gives lower estimates for both London and England (3.2% and 2.7%). It is recognised that issues of non-response, and unwillingness to disclose sexual orientation on surveys, can have an impact on estimates. To improve data in this area, the Office for National Statistics is planning to include a new voluntary question on sexual orientation for people aged 16 and over in the 2021 Census.

The Camden LGBT Forum run by LGBT people for LGBT people promote equality and diversity by the elimination of discrimination in relation to LGBT people living and / or working in Camden. The forum does this through advocacy work, youth work, advisory work and raising LGBT awareness across the borough.

Gender reassignment

Data on gender reassignment is not available at a borough level, however a study by the Gender Reassignment Education and Research Study funded by the Home Office found that there is an estimated number of 200,000 to 500,000 transgender people within the UK.

The Gender Identity Development Service (GIDS) (Tavistock and Portman NHS Trust) is a NHS service based close to the SPD area, to the east, in Belsize Lane. GIDS provides a free service for children and young people up to 18 years, and their families, who experience difficulties in the development of their gender identity.

Pregnancy and Maternity

Data on pregnancy and maternity is not available for the SPD area.

In 2017, there were 2,607 live births to Camden resident mothers. Births in England & Wales fell by 2.6% between 2013-17, while Camden births fell by 5.7% over the same period. More than two thirds of local authority areas (68%) have seen falls in births during 2013-17.

ABC Parent Infant Clinic and Centre for Emotional Development is close to the SPD area to the east and provides a number of services to parents, children and young people including counselling and psychotherapy.

Anna Freud Centre Infant Project is also based close to the SPD area to the west in Maresfield Gardens and also provides a number of services to parents, children and young people.

Marriage and Civil Partnership

Details on Marriage and Civil Partnership is not available for the SPD area.

The 2011 Census indicated that Camden had a lower proportion of married couples (30%) compared with Greater London (39.8%) but a higher proportion of civil partnership (0.9%) than Greater London (0.4%).

Table 9: Household Composition, 2011 Census

Household Composition	SPD Area + No	SPD Area+ %	Camden Average
All People	16,540		
Area (hectares)	130		
All households	7,861	100%	100%
One person households	3,124	39.7%	40.5%
Aged 65+	665	8.5%	10.4%
Other	2,459	31.3%	30.2%
One family and no others	3,306	42.1%	42.6%
Aged 65+	166	2.1%	2.7%
Married / Civil Partnership couple	1,681	21.4%	20.2%
No children	734	9.3%	7.2%
Dependent children	811	10.3%	10.5%
All children non- dependent	136	1.7%	2.4%
Co-habiting couple	885	11.3%	9.8%
No children	750	9.5%	7.5%

Dependent children	126	1.6%	2.0%
All children non-dependent	9	0.1%	0.3%
Lone parent	574	7.3%	10.0%
Dependent children	355	4.5%	6.4%
All children non-dependent	219	2.8%	3.5%
Other households	1,431	18.2%	16.9%
With dependent children	192	2.4%	3.1%
All full-time students	73	0.9%	2.4%
All aged 65 and over	20	0.3%	0.3%
Other	1,146	14.6%	11.1%

In terms of household composition, there is a higher proportion of co-habiting couple households (11.3%) than the borough wide proportion of 9.8%. There is a marginally higher proportion of married / civil partnership households (21.4%) than the borough proportion of 20.2%. The proportion of one person households of over 65 (8.5%) is less than the borough profile of 10.4%. There are noticeably fewer full-time students in the SPD area + (0.9%) than the borough wide proportion of 2.4% although this figure does not take Nido Student Housing within the SPD area into account, which was built after the 2011 Census.

Assessment of the potential benefits and impacts

Whilst there is a range of local community and social infrastructure in relatively close proximity to the SPD area, a theme commonly revealed through community engagement, and expressed through the Neighbourhood Plan, is the concern about how growth places additional pressure on local services and resources.

This identifies the need to consider and, where appropriate, address the impacts on health and wellbeing, and local facilities arising from major developments and increased residential population.

The SPD supports the Council policies and strategies seeking to make growth more inclusive, create social value and create more opportunities and benefits for local communities, including groups with protected characteristics, whilst also assisting in identifying ways to mitigate any potential negative impacts identified through consultation.

Local communities were strongly encouraged and provided with opportunities to get involved in the preparation of the SPD to ensure that people who could be affected by development have their say and a sense of ownership in the future of the area. This in turn should encourage and instill confidence for local communities particularly seldom heard groups many of whom will have protected characteristics to get involved in development proposals that come forward. In addition many local residents will have lived in the area for generations and have a longstanding history and understanding of the area and its context, which is invaluable to the preparation of SPD.

Due to the impacts of Covid-19 the Council took measures to keep its communities and officers healthy and safe by adapting the way it works and does things. Even with the easing of lockdown measures, the Council continued to follow public health advice and distancing rules. To help keep people safe face-to-face public meetings or events were not held. This placed a greater onus to make efforts to inform and engage the groups with protected characteristics mentioned and local organisations providing services to protected groups through different means and “signposting”, e.g. through social media, and using their networks to share information.

Respondent demographics were monitored through the consultation and methods used to target groups who are underrepresented to get involved, such as young people. Officers were available by telephone or email to talk to local people to answer questions and resolve any access and

communication barriers including language. Information could also be interpreted upon request.

The draft SPD focussed on the following three main themes(now increased to four in the revised SPD) and in broad terms these should have positive benefits:

- A New Place: A new neighbourhood with its own distinct character and mix of uses; that integrates seamlessly into the wider city.
- A Different Pace: A more connected and liveable place; successfully linking a new neighbourhood with existing neighbourhoods and town centres, where greater priority is given to walking and cycling in a more accessible and inclusive place.
- A Sustainable and Resilient Place: A greener and environmentally friendly place; with a network of green and urban spaces of different forms and functions requiring innovative measures to reduce environmental impacts.

In terms of more specific potential impacts and benefits for groups with protected characteristics, this is considered more in further sections, but includes:

- The guidance aims to support the creation of a high quality, well designed, greener, environmentally friendly neighbourhood that is inclusive and accessible to all and takes into account the more specific needs of younger and older age groups, people with disabilities and mobility issues and lone parents who may spend more time in the area, e.g. in terms of access to adequate open spaces and enhancing perceptions of safety through good design, more activities and uses aiding surveillance and overlooking.
- Improved accessibility to a range of services, facilities and jobs close to where people live and better routes for walking and cycling will also benefit groups with protected characteristics who may rely on and use local facilities and services more than the general population.

Notes to Question 2

- Here use data to show who could be affected by the decision. Consider who uses the service now and might use it in the future. Think about the social mix of the borough and of our workforce.
- If available use profile of service users and potential users / staff by protected groups: (age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation). You could consider the following:
 - Take up of services, by protected group if available;
 - Recommendations from previous inspections or audits;
 - Comparisons with similar activities in other departments, councils or public bodies;
 - Results of any consultation and engagement activities broken down by protected groups (if available) - sources could include, complaints, mystery shopping, survey results, focus groups, meetings with residents;
 - Potential barriers to participation for the different protected groups;
 - National, regional and local sources of research or data – including statutory consultations;
 - Workforce equality data will be provided by your HR change adviser for organisational change / restructure EQUIAs and
 - For organisational change / restructure EQUIAs include the results of any consultation or meetings with staff or trade unions.
- **Do not simply repeat borough wide or general service equality data** – be as precise and to the point as possible.
- If there are gaps in equality information for some protected groups identify these in this section of the form and outline any steps you plan to take to fill these gaps. Consider:
 - Any relevant groups who have not yet been consulted or engaged;
 - Whether it is possible to breakdown existing data or consultation results by different protected groups;
 - If you are conducting an organisational change / restructure EQUIA and there are data gaps consider asking affected staff to update their details on Oracle.
- We are under a legal duty to be properly informed before making a decision. If the relevant data is not available we are under a duty to obtain it and this will often mean some consultation with appropriate groups is required.
- Is there a particular impact on one or more of the protected groups? Who are the groups and what is the impact?
- Consider indirect discrimination (which is a practice, policy or rule which applies to everyone in the same way, but has a worse effect on some groups and causes disadvantage) - for example not allowing part-time work will disadvantage some groups or making people produce a driver's licence for ID purposes.

Question 3

Does the proposed decision have an impact (positive or adverse) on our duty to eliminate discrimination/harassment and victimisation, promote equality of opportunity or foster good relations between different groups in the community (those that share characteristics and those that do not)?

Following consultation and revision of the draft SPD, it is considered that the proposed decision to approve the final version of the document for adoption in September 2021 will have a positive impact on the Council's duty to promote equality of opportunity and help foster good relations between local groups in the community, including groups with protected characteristics.

The SPD recognises that the change that is happening and likely to come forward offers the chance to identify, with local communities, the key issues and opportunities that could be addressed within the remit of the SPD. The SPD sets out broad principles and objectives to guide future development and improvement in the area. The SPD presents an opportunity that could support significant benefits for local residents, workers and visitors to the area.

As outlined in Question 2 there are a number of specific objectives within the SPD that can help to foster good relationships such as supporting the high quality spaces and mixed use neighbourhood that can invite and encourage local people to interact with each other more in safer and more welcoming places.

The SPD provides guidance based on the following objectives:

A New Place

The SPD aims to support the creation of a high quality residential neighbourhood with its own distinct character that integrates seamlessly with existing neighbourhoods and town centres. The SPD supports seeing a new place that is a more outward looking, inclusive and more connected. In addition it supports seeing a new place that is exceptionally well designed and that is a contemporary and vibrant new neighbourhood for living and working, which benefits neighbouring communities and town centres.

Development proposals are looking at the O2 Centre to consider its future role within the town centre and Finchley Road. Whatever proposals come forward we would like to see a modern, flexible and adaptable retail and leisure environment that will continue to serve local communities by providing a mix of essential and desirable retail, leisure and commercial services, that is successfully designed into a potential new residential neighbourhood and meets the needs of the high street of the future. This should be an inviting mixed use place providing the retail, leisure, employment and community uses that enhance the vitality of this town centre and is more attractively accessible from West Hampstead and Finchley Road.

Development along Blackburn Road from West End Lane should be used to create a more coherent and engaging street connecting the existing town centre on West End Lane into a potential new neighbourhood with the potential to improve the capacity and accessibility of West Hampstead underground station. We would like to see a more pleasant street for walking and cycling that creates an inviting pedestrian and cycling "gateway" between a new neighbourhood and an existing one and where existing routes can be substantially improved.

How will the protected groups be affected by these objectives?

In general the objectives for 'A New Place' are likely to have a positive impact for local people and future residents, employees and visitors including groups with protected characteristics.

The SPD aims to ensure development including redevelopment of the O2 Centre is comprehensive and joined up, as this will make more effective use of land and provide tangible

benefits to local communities including all groups with protected characteristics.

The SPD aims for the area to be residential at its heart, with distinct and diverse design, uses and activity, and integrates positively with adjoining areas and town centres. All of these together will help to improve the overall experience and relationship local people have with the area and each other which will contribute towards improved health and well-being, social integration and social cohesion with existing and new local communities including all groups with protected characteristics. Increasing the residential role of the area is a reflection of the Council's policies and the SPD supports new homes with a range of housing types, especially genuinely affordable homes, which will help to ensure the area is an inclusive place with a diverse mix of residents.

All new homes will need to be built to nationally described space standards or greater and made accessible and adaptable with suitable numbers of wheelchair user dwellings to meet Building Regulations and planning requirements. The mix of housing supported could include housing that meets particular needs, e.g. sheltered or supported accommodation. Providing new housing will create more opportunities for more affordable and suitably sized housing for families in Camden who are currently in overcrowded and/or in temporary accommodation and will have a positive impact on the quality of life for new residents.

The SPD reflects the policies that support a mix of uses, including replacement and new uses and activities such as an adequately sized large supermarket as part of a mix of shops and leisure facilities, workspaces and supporting social infrastructure, including new health and community facilities, where increased demands are created. All of these could provide more access to jobs and training for local people, and opportunities to potentially run their own business locally in affordable workspaces that could be provided.

More employment and training opportunities will especially benefit local young people aged 16 to 24 who were greatly impacted as a result of Covid-19 and prior to this were nationally more than twice as likely to be unemployed as all other age groups combined (Institute of Employment Studies).

In addition people with a disability (who as a group have a higher unemployment rate than people without a disability) could potentially benefit from having more employment and training opportunities closer to where they live and in more accessible and convenient locations and forms. More employment and training opportunities also includes the potential for more openings with flexible working arrangements which can help groups with protected characteristics, including women to return to work after starting a family. The long term unemployed, older people, ethnic minority groups and people with a long-term illness or disability can face disproportionate employment discrimination and will especially benefit from potential new jobs and training opportunities locally.

Supporting social infrastructure, including new health and community facilities, can help to ensure existing and new communities have easier access to the things they need and rely on. This will benefit all communities including all groups with protected characteristics, especially parents with young children, people with a disability or long-term illness, older and economically inactive people.

Will there be any disproportionate impacts or direct or indirect discrimination?

It is considered that overall these objectives will help benefit those living, working and visiting the neighbourhood, including groups of people with protected characteristics.

Proposals that involve substantial redevelopment and construction / reconfiguring / improvements could temporarily affect residents from all of the protected groups in terms of noise, dust, increased traffic and movement of heavier vehicles into the area. People who are in or close to the SPD area during the day are likely to be more affected and these may include young children, their parents, pregnant women, older people and people whose day to day activities are affected

by their health or disability.

Development will bring more people into the area and unless mitigated, risks placing extra pressure on the existing social and transport infrastructure, which could impact all local communities including groups with protected characteristics.

A Different Pace

The SPD supports creating a more connected and liveable new place that successfully integrates with existing neighbourhoods and town centres and where greater priority is given to walking, cycling and stopping to enjoy new spaces and activities. The guidance supports seeing a new neighbourhood that is accessible and inclusive with attractive and safe routes and public realm.

How will the protected groups be affected by these objectives?

In general the objectives for 'A Different Pace' are likely to have a positive impact for local people and future residents, employees and visitors including groups with protected characteristics.

Reducing the barriers to active travel and making the area more pleasant, safer and easier to walk, cycle and access public transport will encourage more people to incorporate more physical activity into their everyday life. This has the potential to greatly improve the physical and mental health of local people including groups of people with protected characteristics. Providing more opportunities for active travel can encourage drivers to drive less, reduce air pollution and potentially create more social interaction as more people could be drawn to being outdoors, meeting up and sharing new and improved streets and spaces.

Improving pedestrian and cycle infrastructure can encourage more people to walk and cycle including local ethnic minority groups, women, older people and disabled people, all of whom are typically under-represented in cycling. In addition people with a disability, most of whom are able to cycle (78% TfL), will have a higher need for inclusive cycling infrastructure that can allow a variety of non-standard cycles, which may include tricycles and hand cycles.

Ensuring site development designs and layouts are permeable and allows for potential future connections will encourage ease of movement throughout the area and to connecting Finchley Road and West End Lane town centres for existing and new communities, into the future. This will break down physical barriers and provide further opportunities for local communities to mix and encourage social integration and cohesion within a comprehensively designed new environment. The SPD highlights the potential to improve accessibility and capacity of those stations which currently do not offer step-free access, which would have significant benefits for a wide range of people and encourage use of public transport through safer and more accessible infrastructure for people with protected characteristics.

Making the environment feel safer through design, including having more engaging, active and safer streets has the potential to greatly improve the mental health and well-being for existing and new communities. This is especially beneficial to people who may feel most vulnerable including women, older people, LGBT+, people with a disability, parents with young children and young people who can especially feel unsafe in some areas of London.

Improving perceptions of community safety can also act to deter crimes of opportunity and anti-social behaviour in the area. Reducing the risks of crime can help to make communities including all groups with protected characteristics feel safer and more at ease within their environment.

Will there be any disproportionate impacts or direct or indirect discrimination?

It is considered that overall these objectives will help benefit those living, working and visiting the neighbourhood, including groups of people with protected characteristics.

To support existing environmental policies car use will be determined by requiring new development to be car-free, which may have an impact on some groups with protected characteristic who may have mobility issues. However, there should be parking provided for people with disabilities or mobility issues as part of comprehensive development.

A Mix of Spaces and a Sustainable and Resilient Place

The SPD aims for development to include a variety of publicly accessible and inclusive spaces with a range of sizes, forms and functions and that are tailored through public consultation. New development will require additional spaces and greening for new homes and other uses including gardens, courtyards, terraces, balconies and green roofs. Development creates the opportunity to strengthen existing biodiversity corridors along railways and improve railway edges through softening / greening. Design should be used to create and frame public open spaces in ways that the quality and inclusivity of public spaces are not compromised.

The SPD supports creating a greener and environmentally friendly place. It encourages development to include a network of green and urban spaces of different forms and functions. A sustainable new place should be created with ambitious and innovative environmental and energy strategies that is resilient to the challenge of climate change and contributes towards improving air quality and a zero carbon future. Recognised and innovative measures to minimise environmental impacts should be incorporated and a resilient place designed for longevity and adaptability should be created.

How will the protected groups be affected by these objectives?

In general the objectives for 'A Mix of Spaces' and 'A Sustainable and Resilient Place' are likely to have a positive impact for local people and future residents, employees and visitors including groups with protected characteristics.

As the publicly accessible and inclusive network of green and urban spaces will vary in sizes, forms, functions, this will ensure that these spaces are attractive and appealing to use by all communities including groups of people with protected characteristics.

In addition, developing high quality, inclusive, safe and accessible public spaces will provide more opportunities for local communities to spend time outdoors and use the variety of public spaces and places available. The variety of spaces encouraged include quiet spaces, spaces to socialise, and spaces of nature and biodiversity, which will be especially beneficial to the mental health and well-being of all local communities, who in theory, are likely to have a stronger appreciation for outdoor spaces as a result of lockdown measures due to Covid-19.

Public spaces can also provide uses for activities for different age groups including young people and therefore provide opportunities to be active and encourage social cohesion. Overall, providing more opportunities to spend time outdoors locally will especially have a positive impact for groups who risk feelings of loneliness or being socially isolated including older people, refugees, LGBT + and people with a long-term illness or disability.

Creating more engaging public spaces could include integrating recreation and play into design which can encourage more outdoor activity within developments and ensure children have safe places to play with their guardians close by. This could encourage local people to engage more with the variety of uses within their neighbourhood, improve the social integration, social cohesion and have a positive impact on the health and well-being for all local communities.

New development will require additional outdoor spaces including gardens and balconies for new homes, and communal spaces. These spaces will encourage residents to get outdoors, socially interact (from public and their own private outdoor spaces), and help to reduce loneliness and isolation particularly from vulnerable groups with protected characteristics, who are more at risk of feelings of being socially isolated.

Having additional outdoor space within new development that allows children to play in safety will be beneficial for parents many of whom can overlook these spaces from their homes and their children to build a range of skills including confidence, self-esteem, resilience, interaction, social skills and independence.

Strengthening existing biodiversity corridors along railways and improving railway edges through greening could potentially transform a disused part of the area into a more sustainable green edge acting as a green buffer to the railways. This could improve the quality of other spaces and routes within redevelopment and opportunity for local communities to enjoy these spaces more and provide health and well-being benefits.

Delivering the principles of a 15 minute neighbourhood can help improve accessibility to a range of services and facilities close to where people live that can be easily accessed through walking or cycling and which will benefit groups with protected characteristics who may rely on and use local facilities and services more than the general population.

Camden's Climate Action Plan and Clean Air Action Plan aim to improve the sustainability of development and move towards zero carbon developments by 2030 and improve air quality in the borough - issues raised in consultations across Camden. Providing measures to alleviate air pollution (primarily through greening and fewer vehicles) will greatly enhance the health and well-being for existing and new communities. .

Will there be any disproportionate impacts or direct or indirect discrimination?

It is considered that overall these objectives will help benefit those living, working and visiting the neighbourhood, including groups of people with protected characteristics.

As mentioned previously, proposals that involve substantial redevelopment and construction / reconfiguring / improvements could temporarily affect residents from all of the protected groups in terms of noise, dust, increased traffic and movement of heavier vehicles into the area.

Notes to Question 3

- Here, think about our other duties (see the notes at the end) and do the proposals impact (positive and or negative) upon those wider duties and aspirations?
- What might say a reduction in the hours of a facility that mainly serves a particular group have on our wider duties?
- Examples of eliminating discrimination: Taking action to ensure that services are open to all groups – e.g. targeting help at particular deprived sections of the community or funding services who work to prevent discrimination
- Does take up of the activity differ between people from different protected groups?
- Have the outcomes of your consultation and engagement results identified potentially negative or positive impacts?
- Are some groups less satisfied than others with the activity as it currently stands?
- Is there a greater impact on one protected group, is this consistent with the aims of the activity?
- For organisational change / restructures analyse the outcomes of consultation with staff and trade unions and analyse the staff data provided by your change adviser
- If you have identified negative impacts include details of who these findings have been discussed with (e.g. Legal, HR) and their views
- Are there any further changes that could be made to deliver service improvements or make the activity more responsive?

Question 4

If there is an adverse impact, can it be avoided?

If it can't be avoided, what are we doing to mitigate the impact?

The potential effects and impacts of the guidance on groups of people with protected characteristics have been considered in Questions 2 and 3.

It is considered that overall the SPD will have no significant adverse impact for any groups of people with protected characteristics and will overall have positive impacts.

The SPD supports a mix of uses and specifies that the mix should include replacement and new uses and activities such as an adequately sized large supermarket as part of a mix of shops and leisure facilities, workspaces and supporting social infrastructure, including new health and community facilities, where increased demands are created. However, whilst the SPD does not create policies for the development and use of land, new developments may have an impact on some of the existing uses and occupiers which may need to be suitably accommodated or relocated and these impacts will need to be assessed and addressed in considering proposals as they come forward.

Identified at Q2, new development will generate an increased residential, working and visiting population placing demands for new or enhanced social infrastructure and this can be secured through development schemes themselves or through s106 planning obligations and Community Infrastructure Levy (CIL) to address these potential impacts depending on the nature and scale of development.

Whilst the SPD supports policies which require new development to be car free, parking for people with disabilities can be provided as part of development schemes or residential permits granted for blue badge holders so the possible impacts on residents with mobility issues can in part be addressed this way.

The construction impacts of development can cause concerns to all sections of the community including groups of people with protected characteristics, particularly those who are susceptible to noise or air quality impacts. All new major developments will be required to have construction management plans to manage these kind of impacts and require developers to liaise with local residents on addressing concerns during construction.

Notes to Question 4

- Assuming there is an impact, what are we going to do about it? We need to make sure the **decision makers understand the impacts**
- All our policies and decisions should be designed to eliminate discrimination and contribute to our other obligations such as promoting good relations.
- If it can't be avoided can it be mitigated in some other way?
- There might be decisions elsewhere or perhaps additional spending on other services which could reduce the impact. Beware of simply saying that we will direct service users to other services or resources without considering the feasibility of doing so or the knock-on effect for those services
- We don't have to completely eliminate a negative impact, but we must identify it and try to mitigate it and the **decision makers must be in a position to fully understand the implications of their decision and balance off the competing interests** – e.g. the impact against the need to make savings and balance our budget

Question 5

Could any part of the proposed activity discriminate unlawfully?
Can we advance equality of opportunity via this decision/policy?
Can we foster good relations via this decision/policy?

SPDs support the development plan by providing additional advice and guidance about how adopted planning policies will be applied on particular topics or in specific areas of the borough.

Taken as a whole the objectives of the SPD addresses a number of issues relevant to groups with protected characteristics and identifies some measures that could improve circumstances for these groups, as well as the local population as a whole. Providing a mix of uses and a range of potential improvements to transport, social and green infrastructure are identified for the SPD area and there is a recognition in the SPD of the desirability of sustaining and building on the existing social and employment role of the area, as future growth and change happens.

The consultation on the draft SPD has given local communities a chance to have a say and to provide a range of views and to identify other potential issues and potential impacts arising from the guidance and its objectives. Participation from groups where participation is disproportionately low was encouraged. Some of these potential issues and impacts may be competing/conflicting or maybe include things that the SPD cannot directly address because it is beyond its scope or statutory purpose. These were considered in responding to the feedback and revisions to the SPD to ensure that no group is unduly disadvantaged by the guidance, and it is considered that no part of the SPD is considered to discriminate unlawfully.

It is currently anticipated that the Council will adopt the final version of the SPD on 24th September 2021. A consultation statement has been prepared to describe the methods and efforts used to engage widely, including with protected groups.

Notes to Question 5

- **There may be decisions or policies where this is not going to be applicable. Explain this briefly in the box above. The important point is that it is carefully considered.**
- Suggest positive steps that can be achieved towards our statutory obligations to remove or minimise disadvantages suffered because of protected characteristics, e.g. taking steps to meet the needs of people from the different backgrounds when they are different to the needs of others, encouraging participation from groups when participation is disproportionately low
- Advancing equality of opportunity - (NB this does not apply to marriage and civil partnership). **This is a “positive duty”** which requires public authorities to consider taking proactive steps to root out discrimination and harassment and advance equality of opportunity in relation to their functions—from the design and delivery of policies and services to their capacity as employers. The duties require us to give consideration to taking positive steps to dismantle barriers. Advancing equality of opportunity might require treating some groups differently e.g. targeting training at disabled people to stand as councillors.
- **The legislation requires when we have due regard in terms of advancing equality of opportunity to:**
 - a. **Remove/minimises disadvantage suffered by those who share a characteristic and is connected to it**
 - b. **Take steps to meet the different needs of those who share a characteristic**
 - c. **Encourage those who share a characteristic to participate in public life or any other activity when participation is disproportionately low.**
- Advancing opportunity includes the fact that the steps needed to meet the needs of disabled persons take into account the disabled persons’ disabilities
- We are required to have “due regard” to the need to foster good relations between people who share a relevant protected characteristic and people who do not share it. This involves having due regard, in particular, to the need to tackle prejudice, and promote understanding.

Examples

- An employer to provide staff with education and guidance, with the aim of fostering good relations between its trans staff and its non-trans staff.
- A school to review its anti-bullying strategy to ensure that it addresses the issue of homophobic bullying, with the aim of fostering good relations, and in particular tackling prejudice against gay and lesbian people.
- Local authority (Not Camden) to introduce measures to facilitate understanding and conciliation between Sunni and Shi’a Muslims living in a particular area, with the aim of fostering relations between people of different religious beliefs.
- Our work to encourage Bangladeshi tenants involvement in TA’s.

EqIA prepared by: George McKenzie

Date: 7th September 2021

EqIA checked by: David Morrissey

Date: 9th September 2021

EqIA approved by: Richard Wilson

Date: 10th September 2021

(Relevant Director Sponsor)

What to do upon approval

The EqIA will be published alongside the adopted Supplementary Planning Document

Explanatory Notes

What is our Public Sector Equality Duty (PSED)?

Under section 149 all public authorities must, in the exercise of their functions, have 'due regard' to the need to:

1. Eliminate discrimination, harassment and victimisation and other conduct prohibited under the Act; EqA 2010 (section 149(1)(a)).
2. To advance equality of opportunity between people who share a relevant protected characteristic and those who don't; This involves having due regard to the need to:
 - o remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
 - o 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 (section 149(4)); and
 - o 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.

Section 149(6) makes it clear that compliance with the PSED in section 149(1) may involve treating some people more favourably than others, but that is not to be taken as permitting conduct that would otherwise be prohibited by or under the EqA 2010 (this includes breach of an equality clause or rule or breach of a non-discrimination rule (section 149(8)).

(Section 149(3), EqA 2010.)

3. Foster good relations between people who share a relevant protected characteristic and those who don't (section 149(1)(c)) (which involves having due regard to the need to tackle prejudice and promoting understanding) (section 149(5), EqA 2010)..

Under the Duty the relevant protected characteristics are: Age, Disability, Gender reassignment, Pregnancy and maternity, Race, Religion, Sex, Sexual orientation.

- In respect of the first aim only i.e. reducing discrimination, etc. the protected characteristic of marriage and civil partnership is also relevant.
- In meeting the needs of disabled people we have a duty to take account of their disability and make reasonable adjustments to our services and policies where appropriate.
- We must be able to demonstrate that we have considered and had due regard to all three parts of this duty. We must also look for anything that directly or indirectly discriminates.

What do we mean by “due regard”?

- This is not a question of ticking boxes, but should be at the heart of the decision-making process.
- decision-makers must be made aware of their duty to have due regard – so understand the legal requirements on them;
- There should be an analysis of the data – who is this going to affect and how will it put against the legal requirements
- We need to have thought about these duties both before and during consideration of a particular policy and we need to be able to demonstrate that we have done so
- The Duty is “non-delegable” so it is for the decision maker themselves to consider with assistance from the report and officer analysis. What matters is what he or she took into account and what he or she knew so it is important to have the relevant papers accompanying the report. The report should make explicit reference to the EQUIA. the duty is continuing so while this guide is aimed at the point of decision we should at appropriate points review our duties against the decision/policy
- The decision maker must assess the risk and extent of any adverse impact and the ways in which such risk may be eliminated before the adoption of a proposed policy or decision has been taken
- Officers reporting to or advising decision makers must not merely tell the decision maker what he/she wants to hear but need to be “rigorous in both enquiring and reporting to them”
- The duty should be reconsidered if new information comes to light

“

What is due regard? In my view, it is the regard that is appropriate in all the circumstances. These include on the one hand the importance of the areas of life of the members of the disadvantaged ... group that are affected by the inequality of opportunity and the extent of the inequality; and on the other hand, such countervailing factors as are relevant to the function which the decision-maker is performing”

Lord Justice Dyson

”

We need to take a sensible and proportionate approach to this based on the nature of the decision or policy being reviewed