

Equality Impact Assessments - equality through public services



This document sets out the draft Equalities Impact Assessment (EqIA) of the London Borough of Camden Local Plan and has been prepared using LB Camden's EqIA template. The EqIA has been updated as the Local Plan has progressed.

**Stage one - what is being analysed and who is responsible for the equality impact assessment?**

Name of the activity being analysed	Camden Local Plan Submission Draft
Service and directorate responsible	Planning and Regeneration, Culture and Environment
Names and posts of staff undertaking the assessment	Benjamin Vickers, Planner, Strategic Planning and Implementation
Date assessment completed	December 2015
Name of person responsible for sign off of the EIA	Frances Wheat, Assistant Director Planning and Regeneration

## Stage two - planning your equality analysis

### Outline the activity being assessed

This part of the Assessment considers generally what the activity entails and how it might have an impact on equality.

Under the Equalities Act 2010, public sector organisations must have regard to the nine protected characteristics covered by the general equality duty. These are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. People with common protected characteristics are often described as belonging to a protected group.

The Council's key planning policy documents, the Core Strategy and the Development Policies of the Local Development Framework (LDF) 2010, are under review to make sure that we continue to have effective and up to date planning policies that reflect current circumstances and help to deliver our local priorities.

Within the Core Strategy and the Development Policies, the focus is to sustainably manage growth so that it takes place in the most appropriate locations, and meets our needs for homes, jobs and services, while continuing to conserve and enhance the features that make Camden such an attractive place to live, work, study and visit.

The National Planning Policy Framework (NPPF) 2012 states that each Local Authority should prepare a Local Plan for its area and that "Local Plans are the key to delivering sustainable development that reflects the vision and aspirations of local communities" (paragraph 150).

The corporate strategy for the borough, the Camden Plan 2012 – 2017, has five key objectives, these are to:

1. Provide democratic and strategic leadership fit for changing times;
2. Develop new solutions with partners to reduce inequality;
3. Create conditions for and harnessing the benefits of economic growth;
4. Invest in our communities to ensure sustainable neighbourhoods; and
5. Deliver value for money services by getting it 'right first time'.

The Local Plan will combine the policies contained within the Core Strategy and Development Policies into a single plan which will be used to assess planning applications within Camden. Existing policies will be updated to reflect Camden's changing needs and incorporate the priorities of various other Council wide strategies.

The Local Plan will be a key delivery mechanism for the Camden Plan. It will ensure that Camden continues to have effective, up-to-date planning policies so that the Council's planning decisions help deliver Camden Plan priorities. The Plan will make a significant contribution towards delivering objectives 2, 3 and 4 in particular. A key theme running through the Local Plan is the objective to increase the health and wellbeing of people who live, work, study and visit Camden.

The Plan will set out the vision, strategy and objectives for development in the borough. Once adopted, the Local Plan will replace the existing Core Strategy and Development Policies LDF documents. The Plan has the potential to impact upon equality as its implementation will affect all those who live, work, study and visit Camden.

The Equality Impact Assessment (EIA) summarises and assesses the potential impacts of the Local Plan policies upon protected groups following two stages of consultation:

**Stage 1: Initial engagement** (November 2013 – November 2014)

**Stage 2: Draft Local Plan** (19 February 2015 - 17 April 2015)

A final stage of consultation on the Plan will take place prior to the submission of a final plan for examination by an independent examiner. The actions and recommendations resulting from the EIA (summarised within Stage 4 of the assessment) will be used to inform the consultation and submission draft of the Plan.

## Gather relevant equality data and information

This part of the assessment considers data about protected characteristics and groups in the area covered by the plan, and information about other themes particularly likely to affect protected groups or characteristics.

Information for this assessment has largely been gathered from the 2011 Census and the Scoping Report of the Local Plan Sustainability Appraisal. Other evidence gathered for the preparation of the Local Plan is published on the [Council's website](#).

### Data about protected characteristics

#### Age

Table 1: Age range proportions – Census data: March 2011.

Age	Camden	Greater London	National	
0-3	4.9%	5.9%	5.0%	Children
4-10	7.0%	8.4%	7.9%	
11-15	4.2%	5.6%	5.9%	Young people
16-18	2.9%	3.4%	3.8%	Young people
19-24	11.9%	8.9%	8.1%	
25-49	44.8%	42.3%	34.7%	Working age
50-64	13.4%	14.4%	18.1%	Older People
65-74	5.9%	5.8%	8.7%	
75-84	3.6%	3.8%	5.6%	
85+	1.4%	1.5%	2.2%	

The age structure of Camden is relatively young, with proportionally more people aged between 19-49 compared to that of Greater London and nationally.

There is a lower proportion of children aged under 16 (16.1%) compared to Greater London or England and Wales (19.9% and 18.8% respectively).

Camden has relatively few people of the older working age group aged 50-64 accounting for a fifth (13.4%) of the population, compared to 14.4% in London and 18.1% nationally. The borough also has similar proportion of older people aged over 65 years (10.9%) when compared to Greater London, but smaller than the national average for England and Wales (16.5%).

#### Disability

During 2011, 14.4% of Camden residents stated that their day-to-day activities were limited due to a health problem or disability which has lasted, or will last at least 12 months. This figure is above the inner London average of 14.2%, but lower than England and Wales at 17.9% (Census data 2011).

Camden's 2008 Housing Needs Survey Update (based on 2004 data) looked at households that had special needs in terms of their housing requirements. Across the borough, the survey indicates that 6.4% of households contained a person with a physical disability, 0.4% with a severe sensory disability, and 0.6% with a learning disability. A significant number of households (2.4%) contained people with more than one special need, or more than one person with a special need.

#### Gender reassignment

No data is available regarding gender reassignment.

## Marriage and civil partnership

The 2011 Census indicated that Camden had a lower proportion of married couples (29.5%) compared with Greater London (39.8%) but a higher proportion of same sex civil partnership (0.9%) than greater London (0.4%) (Census data 2011).

## Pregnancy and maternity

The conception rate per 1,000 women in Camden during 2012 stood at 62.3, this is relatively low compared with Greater London and nationally and has been slowly declining since 2009. Camden teenage conceptions are significantly lower compared to Greater London.

## Race:

Table 2: Ethnicity proportions – Census data: March 2011

		Camden	Greater London	National
<b>Ethnicity</b>				
White groups	White British	44.0%	44.9%	80.5%
	White Irish	3.2%	2.2%	0.9%
	Gypsy/Irish Traveller	0.1%	0.1%	0.1%
	White Other	19.0%	12.6%	4.4%
Mixed/multiple ethnic groups	White and Black Caribbean	1.1%	1.5%	0.8%
	White and Black African	0.8%	0.8%	0.3%
	White and Asian	1.8%	1.2%	0.6%
	Other Mixed	1.9%	1.5%	0.5%
Asian groups	Indian	2.8%	6.6%	2.5%
	Pakistani	0.7%	2.7%	2.0%
	Bangladeshi	5.7%	2.7%	0.8%
	Chinese	2.9%	1.5%	0.7%
	Other Asian	4.0%	4.9%	1.5%
Black groups	Caribbean	4.9%	7.0%	1.8%
	African	1.6%	4.2%	1.1%
	Other Black	1.7%	2.1%	0.5%
Other Ethnic Groups	Arab	1.6%	1.3%	0.4%
	Any Other Ethnic Group	2.3%	2.1%	0.6%

Camden's population is ethnically diverse. In 2011, 34% of Camden residents were from Black or Ethnic Minority groups. A further 22% are non-British White residents including Irish and others originating mainly from English-speaking countries abroad and from Eastern Europe and beyond.

According to the 2011 Census ethnic group categorisation, Bangladeshis form the largest minority group in seven Camden wards; Black African the largest minority in six, Other Asian in four and Chinese in one. In all wards at least 20% of the population is from Black and Ethnic Minority groups. There are no wards in Camden where White groups form a minority.

Camden's largest communities with a distinctive cultural identity are the Bangladeshi, Black African and Irish communities, followed by Chinese and Indian. In common with other inner London boroughs, there are small but growing communities of migrants who are refugees or seeking asylum, as well as new migrants resulting from EU enlargement.

According to the 2011 Census, 60% of Camden residents were born in Britain or Ireland. Of the remainder, 11% were born in other EU countries and 30% from elsewhere in the world. After England, more Camden residents were born in the United States, Bangladesh, the Republic of Ireland, France, China and India than any other countries.

Language spoken was recorded for the first time in the 2011 Census. In Camden, after English, the most

commonly spoken languages were Bengali, French, Spanish, Italian and Somali, German, Arabic, Portuguese and Polish.

Romany Gypsies and Irish Travellers are recognised in law as distinct ethnic groups therefore they are protected under the Equality Act from discrimination on the basis of race. At present there are two formally designated Gypsy sites within the borough consisting of 6 pitches (a pitch is an area large enough for 1-2 caravans) occupied by travellers of Irish decent. Up to 5 new families however are currently housed within bricks and mortar and on the waiting list for new pitches to become available.

## Religion

Table 3: Faith proportions – Census data: March 2011

		Camden	Greater London	National
<b>Religion</b>	Christian	34.0%	48.4%	59.3%
	Buddhist	1.3%	1.0%	0.4%
	Hindu	1.4%	5.0%	1.5%
	Jewish	4.5%	1.8%	0.5%
	Muslim	12.1%	12.4%	4.8%
	Sikh	0.2%	1.5%	0.8%
	Other religions	0.6%	0.6%	0.4%
	No religion	25.5%	20.7%	25.1%
	Not Stated	20.5%	8.5%	7.2%

Camden has a diverse religious population, with a higher proportion of Jewish and Buddhist people than in London and a marginally smaller proportion of Muslim people. In the 2011 Census, 34% of Camden people described themselves as Christian, 12% Muslim and 4.5% Jewish, with other religions combined accounting for less than 4% of the population. 25.5% were recorded as having 'no religion' and 21% did not respond to the (voluntary) question.

## Sex/gender

The resident population in Camden is 220,338 of which 51% are female and 49% male.

## Sexual orientation

On the basis of the Integrated Household Survey, the Office for National Statistics (ONS) data (2011-2012) suggests that in London, 91% of those surveyed identify themselves as heterosexual/ straight, 2.5% as gay, lesbian or bisexual, 0.4% have an alternative sexual identity, and 5.7% do not know or did not respond. The ONS emphasises that Integrated Household Survey is an experimental data source undergoing evaluation for inclusion in new official statistics.

At borough level, the 2009 Camden Talks survey (based on a representative panel of 2,000 residents, with responses weighted to reflect the borough's demographic profile), found that 76% of the panel considered themselves heterosexual or straight, 6% homosexual, gay or lesbian and 1% bisexual. Camden's Lesbian, Gay, Bisexual and Transgender (LGBT) Forum estimates the Borough's homosexual, bisexual and transgender profile to be between 10-12% due to Camden's location, diversity and developed LGBT social capital.

The 2011 Census showed that 0.9% of Camden's usual residents (aged 16+) were in a registered same-sex civil partnership.

## Information about other themes likely to affect protected groups

### Crime

Camden has the second highest crime rate of any London local authority, despite seeing the greatest reduction in overall crime compared to all London boroughs between 2001/2 and 2011/12. Between the period 2001/2 and 2011/12 the total number of reported crimes dropped by 32% (53,031 to 35,825). Camden has higher levels of alcohol-related crime, violent crime and sexual offences than the national

average.

Domestic violence is recorded at 15% of all recorded violent crime, although it is thought that the figure is much higher as many are unreported. Hotspots tend to occur in areas with high levels of social housing. 80% of victims are female. Theft accounts for the majority of recorded crime (53%) followed by 'violence against the person' (VAP).

There are just over 5,000 VAP recorded offences in Camden each year, which equates to around 16% of all recorded crime. Camden also has the highest rate of hate crime in Inner London which has seen increases in recent years.

## **Health**

Census data shows that there has been a significant increase in the percentage of people living in Camden that describe their health as 'good' and 'very good'. Overall life expectancy for men and women in Camden has improved at a faster rate over the past 10 years compared to London and England. Results of the 2011 Census showed that between 5-6% of residents described their health as 'bad' or 'very bad' in line with the national average.

There are approximately 1,147 deaths a year in Camden from all ages. The main causes of death in Camden (all ages) are from circulatory diseases (31%), cancer (29%) and respiratory disease (12%). 43% of all deaths (487) are premature (deaths of those under the age of 75 years). It is of note with regards to premature deaths, a higher proportion are due to cancer (35%) than circulatory disease (25%) and this is particularly stark for women compared to men.

The Camden GP dataset shows that among people aged 18 years and over, registered with a GP in the borough, 20,442 are obese and 42,709 are overweight. These rates are however lower than the rest of the UK.

In 2012, there were 3,400 people recorded on Quality of Outcome registers for serious mental illness in Camden. Camden's crude diagnosed prevalence (1.3%) was significantly higher than the London and England averages, and the third highest across England. Around 25% of people aged 18 and over diagnosed with a serious mental illness in Camden have a bipolar disorder. The remaining 75% are diagnosed with psychoses (including schizophrenia).

There are stark geographical health inequalities in Camden. People suffering from poor general health, mental ill health, and low life expectancy are generally concentrated in a few, deprived wards in the borough including St Pancras and Somers Town, Haverstock, and Kilburn. In contrast, residents in the most affluent parts of the borough such as Hampstead and Highgate, have longer life expectancy, better general health, and fewer mental health problems than the England average.

## **Housing**

The Office National Statistics (2012 interim) forecast the population in Camden to increase by 40,738 between 2011 and 2021. Greater London Authority (GLA) projections (2012) for the same period projected a population increase of 24,111; however this figure is constrained to the housing trajectory. GLA household projections (also constrained to the housing trajectory) forecast an increase of 15,200 (15%) during 2013-2026.

One person households are the most common household type within the borough (40,400), followed by couple households (26,300) and other forms of multi-person households (26,200). Numbers of these forms of household are expected to rise until 2031 (and beyond), with multi-person and couple households rising faster than that of one person households. Lone parent household numbers are relatively low (4,600) and are expected to remain steady.

The average cost of buying a home in Camden in 2013 across all housing types was £680,697, whilst average house prices across Greater London were considerably lower, at £389,066. This comparison is also the same for the rental market in Camden. Figures obtained in 2012 showed that average house prices were 13.7 times higher than the average income of those living in the borough.

The percentage of owner occupiers tripled between 1961 and 1991, but has now stabilised and started to fall at 33% in 2011 compared to 35% in 2001 and 34% in 1991. Renting from the Council has dropped

from 34% in 1991 to 23% in 2011 whilst, private renting is growing rapidly from 23% in 2001 to 31% in 2011.

Camden is home to more higher education institutions than any other local authority area. The borough is home to the largest student population in London, with 24,300 domestic and foreign students living in Camden and attending publicly funded higher education institutions. 31% live in University or private halls of residence. More than a third of students (42%) live in the area south of Euston Road.

### **Unemployment**

Data from jobcentre plus and GLA claimant count (unemployment) show that Camden has a below average claimant count compared with Greater London and the national average. Claimant count unemployment rates have however been increasing. There is also significant disparity between different wards in Camden, in that some wards in Camden rank very high in unemployment, whereas others rank very low, showing a clear socio-economic divide in the borough.

### **Public realm**

The Equality Impact Assessment for the Camden Transport Strategy 2011–31 included data from a diverse range of sources about how protected groups experience transport and the public realm.

The assessment of the Transport Strategy does not provide the most up-to-date local information; nevertheless, it does allow us to draw some insights that are relevant to the plan and potential impacts on those with protected characteristics.

*Age – Young people* - Road traffic casualties are a major contributor to premature death among young people. Traffic danger can greatly deter children from playing freely outdoors. Surveys indicate that the primary transport concerns for young people are road safety and improved conditions for cyclists. Young people also have concerns about personal safety and security in the public realm. Camden has been successful in reducing child casualties, particularly by reducing traffic speeds. Streets designed to reduce speeds can also be designed for informal play and easier pedestrian and cycle journeys, and increase opportunities for children to interact (Transport Strategy data (2011))

*Age – Older people* – Transport is a major factor in the quality of life of older people. Surveys have suggested a need for wider footways, road crossings with longer crossing times and more community seating (Transport Strategy data (2011)).

*Disability* – Disability covers a wide range of impairments with different implications. People with mobility impairments may only be able to walk short distances so adequate seating is needed in the public realm. Street furniture and clutter can create hazards for people with visual and mobility impairments. Good lighting and clear signage is helpful for people with visual impairments. Sufficient safe road crossings with level access, tactile surfaces and adequate crossing times are needed by people with visual and mobility impairments, including wheelchair users (Transport Strategy data (2011)).

*Race* – Black Londoners are more likely to be injured in road accidents and Black children from the least deprived areas have a higher chance of injury. Road safety for Black children can be partly addressed by providing safe areas to play and socialise (Transport Strategy data (2011)).

*Sex / gender* – Women are four times more likely to be worried about personal safety, particularly at night. National crime data shows that men are far more likely to be the victims of violent crime in all age groups, but also that it is heavily concentrated among young men. Men living in England and Wales are more likely than women to be attacked by strangers. During 2009/10, 79% of stranger violence affected men compared to 21% for women (Human Rights Commission, 2010) measures are therefore needed to improve safety in public spaces and in transport waiting areas. These could include features which promote natural surveillance and increased lighting levels (Transport Strategy data (2011)).

*Sexual orientation* – Camden has the highest reported rate of hate crime in inner London. The area of most concern is Camden Town: this is associated with the night time economy with attacks occurring close to gay clubs as well as at transport hubs. Hampstead Heath is also a hotspot for LGBT attacks and carjacking (Transport Strategy data (2011)). Combined with natural surveillance and increased lighting in public spaces, measures can be taken to ensure that areas such as Camden Town do not acquire excessive proliferations of food, drink and entertainment uses. High concentrations of food, drink and entertainment uses can increase crime levels during the operating hours of the night time economy.

## Consultation and engagement

This part of the Assessment considers consultation at the various stages of the Plan's preparation, and how far it has included engagement with protected groups. It also considers what we have found out about issues relevant to protected groups in Camden.

In summary, consultation has included the following:

### **Stage 1: Initial engagement** (November 2013 – November 2014)

- Initial call for views
- Developers meeting
- Development Sector Workshop - Growth and Employment
- Development Sector Workshop - Housing
- Community representatives meeting
- Advertisement policy meeting
- Basement policy meeting

### **Stage 2: Draft Local Plan** (19 February 2015 - 17 April 2015)

- Development sector workshops
- Community workshops
- Faith Leaders Forum meeting
- Youth council meetings
- Reactive forum meeting
- Targeted emails
- Social media
- Leafleting

### **Stage 1: Initial Engagement**

In this stage the Council invited comments on the operation of its current planning strategy and policies and suggestions on how they could be amended and improved.

#### **November - December 2013 - Initial 'call for views'**

A 'call for views' engagement exercise commenced on 8 November 2013 and closed on 20 December 2013 to seek input on the content of the local plan at an early stage.

Representations regarding matters that people thought the council should consider within the plan were invited. As a guide, it was suggested that we would particularly like to hear views on the following:

- which of our planning policies could be improved and how?
- which policies are working well and should be retained?
- whether any new policies are needed?
- whether any policies or parts of the plan are no longer needed?
- what more can our plan do to create the conditions for economic growth and harness the benefits of that growth for the borough and its residents?
- how can our planning policies do more to contribute to reducing inequalities in the borough?
- how can our plan contribute further to creating sustainable communities?
- how can our policies maximise the delivery of genuinely affordable housing and housing in general?
- should we continue our current approach to protecting employment land or should this be amended (and if so how)?
- do you think it would be helpful to combine the Core Strategy and Development Policies into a single 'local plan'?



Methods of public engagement included:

- a notice on the Council's 'We are Camden' consultation webpage;
- a web page on the Planning and Built Environment section of the Council's website;
- separate communication with designated and emerging neighbourhood forums; and
- notification to statutory consultees, which include English Heritage, TFL, Environment Agency, Network Rail etc.

Over 800 emails were also sent to contacts from our Planning Policy database including residents groups, interest groups, developers and to all locally elected councillors. A number of organisations representing protected groups were included in the mail out. A summary of these is below:

Age: 15

Disability: 28

Faith: 22

Race: 70

Sex: 3

(19 groups could be defined in more than one category (e.g. Black Disabled Peoples Association).

No responses from organisations representing protected groups were received.

Two comments were however received during the initial 'call for views' consultation relating to protected groups:

A comment was received from a landowner that Camden's current requirements for development to provide "*the highest standards of access in all buildings and places and requiring schemes to be designed to be inclusive and accessible*" (Core Strategy policy CS14) did not take into account the difficulties in achieving high levels of access within heritage buildings. A suggested improvement to the wording of the policy should be that development should "*seek the highest standards of access in all buildings and places and requiring schemes to be designed to be inclusive and accessible as far as practicable and reasonable*".

A comment was received from a Neighbourhood Forum that Camden's current stock of wheelchair housing is insufficient and that the council's target of acquiring 10% of new homes to be of wheelchair housing standard is too low.

### **19 November 2013: Developers' meeting**

A meeting was held to receive feedback from developers regarding what they would want to see in the local plan. The meeting was attended by seven developers, six council staff and one Councillor. Discussion mainly focused upon the delivery of housing (such as providing more rented housing and more flexibility regarding affordable housing delivery). Protected groups were not represented or discussed during the meeting.

Key messages from the meeting were summarised as:

- provision of affordable housing is difficult in high value areas. More market housing would provide greater returns and contributes to mixed communities.
- the Council should be clear regarding the type and mix of housing required. Prioritise.
- policies should be flexible.

### **23 January 2014: Development Sector Workshop (Growth and Employment)**

A workshop was set up specifically to discuss economic growth and employment and how this should be addressed within the Local Plan. The meeting was attended by 13 developers/landowners/consultants, 3 universities, 2 councillors, 3 officers and 1 neighbouring borough officer. Protected groups were not represented or discussed during the meeting.

Key messages from meeting were summarised as:

- language and communication is key – the Council should provide a clear message of supporting the growth benefits of emerging education/medical sector.
- less policies rather than more would be preferred.
- tall buildings – best reviewed on a case by case basis.

## **2 February 2014: Development Sector Workshop (Housing)**

A workshop was set up specifically to discuss housing and how this should be addressed within the Local Plan. The meeting was attended by: 5 officers, 13 developers/landowners/consultants and 1 university. Protected groups were not represented or discussed during the meeting.

Key messages from the meeting were summarised as:

- properly planned, adaptable tall buildings should be supported.
- policies should not be complex to allow room for discussion and negotiation.
- developers could be more transparent regarding development viability.
- developers called for greater consideration of off-site affordable housing.

## **5 March 2014: Community representatives meeting**

A workshop was set up for Camden's community groups. The meeting was attended by 9 community groups and 4 neighbourhood forums. Protected groups were not represented or discussed during the meeting.

Key messages from the meeting were summarised as:

- supporting growth in the new education/medical sector should not be at the expense of existing employment/job opportunities.
- mixed use should be further promoted.
- a piecemeal approach to providing housing may not be the best means of delivery.

## **27 October 2014: Advertisement policy meeting**

A meeting was organised with community organisations and councillors to acquire feedback on potential changes to Camden's advertisements policy. The meeting included representatives of 16 community groups and Councillors. Protected groups were not represented or discussed during the meeting.

Key messages from the meeting were summarised as:

- advertisements should be carefully managed, particularly within conservation areas.

## **4 November 2014: Basement policy meeting**

A meeting was organised with community organisations to acquire feedback on potential changes to Camden's basements policy. The meeting included representatives of 7 community groups and a number of residents and Councillors. Protected groups were not represented or discussed during the meeting.

Key messages from the meeting were summarised as:

- calls for Camden to strengthen existing policy and include further restrictions.
- attendees advised that LB Camden's actions may depend upon the progress of LB Kensington and Chelsea's restrictive basement policy which is at the examination stage.
- the council has taken all responses into consideration during the development of the policy.

## **Stage 2: Draft Local Plan**

Stage 2 of the consultation began on 19 February 2015 and finished on 17 April 2015. For the second round of consultation, the Council published the Draft Camden Local Plan for comment. The draft plan took into consideration all of the responses we received during Stage 1. The Council also produced a series of summary topic papers on the content of the plan. These documents were published on the Council's website.

The Council published the details of the consultation on the WeAreCamden the Council's consultation hub and emailed over 800 contacts from our own Planning Policy database (for a breakdown of organisations from our database known to represent protected groups – please refer back to Stage 1). For the second round of consultation we also sent additional targeted emails, ran a series of workshops, distributed leaflets, engaged with social media, and conducted a community engagement exercise.

## **6 March 2015 and 23 March 2015: Development sector workshops**

The development industry workshops included representatives from a range of developers, landowners and institutions who have interests in Camden. Protected groups were not represented or discussed during these meetings.

Key messages from the meeting were summarised as:

- support for approach to protecting office space.
- calls for draft policy to be more flexible with regards to affordable housing where affordable business space is provided.
- calls for temporary uses to be considered during HS2/Euston area redevelopment.

### **17 March 2015, 18 March 2015 and 27 March 2015: Community workshops**

The community workshops involved representatives from a wide range of community groups in the borough. We invited Neighbourhood Forums, Amenity Groups, Residents Associations and Conservation Area Advisory Committees. In addition, the invitation was circulated to all contacts on CINDEX, Camden's community group contact database. Officers presented draft Local Plan policies. Protected groups were not represented or discussed during these meetings.

Key messages from the meeting were summarised as:

- calls for draft policy to be stronger to achieve more affordable housing.
- tall buildings and higher densities are not appropriate in conservation areas.
- support for draft policies regarding car free and basement development.

### **19 March 2015: Faith Leaders Forum meeting**

The Camden Faith Leaders Forum includes representatives from Christian, Jewish, Muslim and Buddhist communities. Officers presented relevant draft Local Plan policies at the meeting attended by 14 faith leaders.

Key messages from the meeting were summarised as:

- calls for the council to support provision of new faith facilities.
- concerns raised regarding a lack of affordable housing being delivered.

### **17 March 2015 and 31 March 2015: Camden Youth Council**

The Camden Youth Council is a committee of elected young people (aged 14-18) representing Camden. The committee is chaired by Camden's Youth MP who represents Camden at national Youth parliament. Officers presented relevant draft Local Plan policies at the Youth Council's Committee meeting (attended by 12 people) and also attended the Youth Council's annual Shout Out conference.

Shout Out is an event open to young people aged 13-19 (up to 25 with disabilities) who attend a Camden school or youth project or live in Camden and designed to give young people the chance to get involved and have a say on issues affecting them. LB Camden's planning policy team manned a stall at the event to promote the emerging Local Plan and to hear at first hand the views of the many young people at this event. Over 100 young people attended.

Key messages were summarised as:

- concerns regarding Schools reaching capacity.
- it is difficult to access sports facilities.
- concerns over closure of youth clubs.
- there is a lack of things for young people to do in Kentish Town.
- concerns over closure of pubs.
- concerns regarding high levels of homelessness and lack of affordable housing.

### **20 March 2015: Reactive Forum meeting**

The Reactive Forum is a committee of disabled young people (aged 14-18) who volunteer to offer advice on Council policy. Officers presented relevant draft Local Plan policies at the meeting. The meeting was attended by 7 forum members.

Key messages were summarised as:

- concerns regarding proliferation of betting shops and pay-day loan centres.
- more outdoor facilities are required in open spaces, such as gyms.
- members enjoyed going to town centres with family. Variety within town centres is therefore

important.

- members largely reliant upon cars to travel outside Camden, but could travel to their nearest town centre unaided.
- buildings should be accessible.

### **Targeted emails**

A number of emails were also sent to individuals and organisations within Camden's contact records. These include:

- An article included within the Voluntary Action Camden (VAC) weekly newsletter and e-bulletin sent to 2,400 voluntary and community organisations.
- 100 Tenants and Residents Associations.
- 560 people from Camden's Active Tenants register. This is a list of tenants signed up to be notified of consultations.
- 150 people emailed from the District Management Committee members list.
- 600 people emailed from the Camden Association of Street Properties list. This is a list of people who live along larger roads and like to be notified of road works.
- 9 neighbourhood planning groups who extended the consultation invitation to their members which is estimated to be circa 1,500 individuals.

Associated with the production of the draft Local Plan, a draft Equality Impact Assessment was also completed. The assessment identified that some older people and young children within areas of lower public transport provision, namely Hampstead and Highgate, may have their accessibility affected negatively by Policy T2 – Car Free. To consult on this particular issue, targeted emails were sent to organisations representing older people and parents groups based within the Highgate and Hampstead areas. These included:

- Greater London Pensioners Association (based at Hampstead Town Hall)
- Hornsey Pensioners Action Group (based in Highgate)
- Hampstead Community Centre Toddler Baby Group
- National Childbirth Trust (Hampstead Branch)
- Mothers Talking (based in Highgate)

The Equality Impact Assessment also identified Gypsies and Travellers as being a particular group affected by Policy H11 – Gypsies and Travellers. Targeted emails were therefore sent to 10x Gypsy and Traveller groups for consultation on this particular policy.

### **Social Media**

VoxUp is an online tool for gathering feedback on topics. The site is designed for ease of use and speed, allowing users to browse questions and respond to them by upvoting or downvoting (agree or disagree), and leaving short comments. We placed a link to the VoxUp site on all of our consultation materials, emails and some tweets.

In addition we commissioned Community Engagement Officers (CEOs) to run targeted outreach research work. Each CEO had a tablet computer with Vox-up installed on it to gather feedback. The officers visited a wide range of locations including parks, community centres, libraries, leisure centres, local cafes, GP surgeries, shopping centres, colleges and universities, and tube stations to speak to members of the public to invite comment on the draft Camden Local Plan. Their time was divided equally around all the wards with some additional sessions at the Camden Council office at 5 Pancras Square.

Over the course of the consultation period we also sent 31 tweets using Twitter asking for comment on the draft Local Plan. We used the LB Camden official twitter account @camdentalking which has 14,333 followers. Each tweet included questions seeking views on particular issues and resulted in more than 500 engagements including 161 link clicks.

## Leaflets

We prepared a summary leaflet notifying and seeking comment on the draft Local Plan. The leaflets were made available at 45 locations around the borough including Camden libraries, community centres, and resource centres.

### Summary of written representations from Stage 2 consultation relating to protected groups:

#### C2 - Community facilities:

- Community, culture and leisure facilities should be easily accessible by public transport. (Residents Association).
- There is an overprovision of schools within the Hampstead/Belsize Park area resulting in severe traffic problems during the school run. (Residents).

#### C3 (previously C2) - Culture and leisure facilities:

- The key role of community and cultural facilities in supporting the LGBT community could be acknowledged. Development proposals should protect and enhance facilities and services that meet the needs of particular groups and communities. (GLA).
- The Plan should increase protection for longstanding cultural establishments that provide a similar function to pubs in supporting communities and minority interests. (Interest Group).

#### T2 – Car free development and limiting the availability of parking:

- Car free development could restrict the mobility of people unable to use sustainable transport. (Residents Associations).

#### H11 - Gypsies and Travellers:

- Provision of 7x pitches should be the council's minimum target (as opposed to the initial target stated of 2-7 pitches). The consultation that had taken place with Gypsies and Travellers in deciding upon the figure was inadequate. (Gypsy and Traveller Group).

#### C6 - Access for all:

- Step-free access should be in all rail and underground stations. (Neighbourhood Forum).
- Reference should be made to Lifetime Neighbourhood principles, which is a government initiative to ensure that places allow people to live fulfilling and independent lives as they grow older. (Councillor).

## Have you identified any information gaps?

Some data is absent or limited e.g. sexual orientation.

Data regarding interactions with the public realm has been obtained largely from the Camden Transport Strategy 2011. Some of this information may therefore be slightly outdated.

No responses to the Stage 1 consultation were received from organisations working for the interests of protected groups. It is unknown whether the authors of the responses we did receive had protected characteristics.

No responses were received from any of the targeted emails sent to groups as part of our Stage 2 consultation identified as potentially affected by car free development (T2) within the draft Equalities Impact Assessment.

## Stage three - analysing your equality information and assessing the impact

Analysing the evidence outlined above, could the activity have a negative or positive impact on protected groups?

This part of the assessment outlines the policies contained within the plan and the impact their delivery is likely to have upon protected groups.

### **Policies not relevant to equalities or offering general benefits to all protected groups:**

There are several policies which are considered not be relevant to the Equalities Impact Assessment or offer general benefits to all groups. The policies are summarised below.

#### **A1 – Managing the Impact of development**

Policy A1 seeks to ensure that development does not cause harm to amenity.

#### **A4 – Noise and vibration**

Policy A4 seeks to ensure that noise generated from development (e.g. plant, machinery, entertainment etc.) does not exceed acceptable threshold levels.

#### **A5 - Basements and lightwells**

Policy A5 seeks to ensure that basement development takes place without structural harm to the site or neighbouring buildings.

#### **CC3 – Water and flooding**

Policy CC3 seeks to ensure that developments mitigate against flood risk, and identifies flood risk areas.

#### **CC5 – Waste**

Policy CC5 seeks to protect Camden's existing waste sites and ensure development reduces waste and promotes recycling.

#### **D3 - Shop fronts**

Policy D3 seeks to ensure that shop fronts are well designed and respect local character.

#### **D4 – Advertisements**

Policy D4 seeks to ensure that advertisements are sized and placed appropriately.

#### **DM1 – Delivery and monitoring**

Policy DM1 sets out how the Local Plan will be delivered and monitored.

#### **E3 – Tourism**

Policy E3 supports tourism and focuses the growth of this industry this into particular areas such as King's Cross, Euston, Tottenham Court Road and Holborn.

#### **T3 – Improving transport infrastructure**

Camden has a number of infrastructure assets including rail, cycle and public transport networks. Policy T3 seeks to protect these and safeguard projects to improve infrastructure such as Crossrail, the West End Project, routes to Farringdon Station and Camden Town and Holborn Station capacity improvements.

#### **T4 – Promoting the sustainable movement of goods and materials**

Policy T4 promotes the movement of freight via rail and waterway as an alternative to transportation by road. Road freight should also be routed on major roads where possible.

## **Policies impacting upon protected groups:**

It is considered that all groups will benefit in some way from the policies below. Particular affects relating to individual protected groups are identified and discussed.

### **A2 – Provision and enhancement of open space**

This policy seeks to protect existing and provide additional open space within the borough particularly in areas of deficiency. It takes account of Camden's Open Space, Sports and Recreation Study 2014 which identified 'park deficiency areas'. These are locations in the Borough which are greater than a 400 metre walking distance, or 5 minute travel time, from any form of public park provision. Open space deficiency was identified in the areas to the west of the Borough and also Gospel Oak, Somers Town, Kentish Town, Holborn, Covent Garden and Frognaal and Fitzjohns ward.

The impact of open space deficiencies are most greatly felt in higher density residential areas with higher numbers of children. The protection and addition of open space will increase opportunities for safe play. Those less mobile, including older and disabled people will also benefit as they will find open space more accessible.

### **A3 - Biodiversity**

The Council will seek to protect green spaces, trees, gardens and habitats under this policy. It is considered that young people will benefit from this policy as it increases the opportunity for learning outside of the classroom.

### **C1 – Improving and promoting Camden's health and wellbeing**

Camden has one of the largest health inequality gaps between occupational groups in England for both men and women. Policy C1 therefore seeks to improve the health and wellbeing of Camden's population. Its aims include ensuring that development creates the basic environment for people to lead a healthy lifestyle (such as access to open space, improvements to air quality, public realm, active travel opportunities – e.g. walking and cycling etc.). The policy also seeks to ensure that development contributes towards the health priorities of the Health and Wellbeing Board, protecting existing health facilities and supporting provision of new ones. Larger developments will also be required to submit a Health Impact Assessment which should identify the likely health impacts of the development and include measures to improve health outcomes and address negative effects and inequalities. The policy also recognises that the number of older people (aged 75+) within Camden will rise during the plan period and therefore promotes the inclusion of Dementia Friendly housing within residential developments.

The policy will naturally benefit groups with higher health-related needs such as older and disabled people. A key priority for Camden's Health and Wellbeing board is also to address the growing problem of childhood obesity. Improvements to the basic environment, particularly open spaces and active travel opportunities referred to within this policy (alongside more detailed policies covering these topics) will therefore help to achieve this aim.

### **C2 - Protecting and enhancing community facilities**

Community facilities such as schools, community centres, health care facilities etc. will be protected and provision of new facilities promoted under this policy.

Representations were received in response to our Stage 2 consultation stressing the importance that new community facilities should be sited in areas of good public transport accessibility. This has been adopted within the policy and should therefore provide particular benefits for less mobile groups such as older and disabled people and people with young children.

Older people in Camden generate the greatest demand for health care, social care and support services. An increasing amount of care is taking place at home with people staying in their homes longer, although there will still be a requirement for day centres, long-term care homes, nursing care homes and extra-care sheltered housing.

Camden has many meeting places, churches, synagogues, temples, community facilities and prayer centres that cater for a range of faiths and beliefs. The policy seeks to support community organisations and religious groups to help them to meet their need for faith facilities. During the development of the

policy, officers considered the feedback received from the meeting with Camden Faith Leaders Forum during March 2015.

For many, local community centres and cultural centres are the main source of support, particularly for people from Ethnic Minorities. These centres support social activity and provide help and advice for dealing with life's difficulties.

Calls were made by local residents from during our Stage 2 consultation that there should be no further schools expansions within the Hampstead/Belsize Park area as overconcentration of schools within this area is causing road congestion during the school run. Resisting schools expansion in this area has the potential to cause negative impacts for young people. Amendments were however made to Policy C2 to balance this issue which states that the Council would adopt a position to resist further school expansion in these areas unless it could be demonstrated that potential transport impacts would be addressed.

### **C3 - Protecting and enhancing cultural and leisure facilities**

Camden is host to a wealth of arts and cultural facilities such as theatres, arts centres, exhibition spaces, music venues, museums and libraries which are important features supporting Camden's social diversity. There is also a need to increase provision of sports facilities within the borough to meet the needs of Camden's growing population. This policy therefore seeks to protect and enhance provision of these facilities where suitable opportunities arise.

Protecting and enhancing arts and cultural facilities can provide particular benefits for ethnic, religious and LGBT communities. The Greater London Authority and several interest groups highlighted that users of these facilities will often be drawn from across London rather than solely the immediate area due to the unique space or service provided. These venues and spaces are often highly valued by the groups they serve because of their relative scarcity and the fact they have been designed or adapted to serve the distinct needs of the group or community.

As noted during our meeting with Camden Youth Council, young people can find access to sports facilities difficult. The policy should therefore provide particular benefits for young people by creating more opportunities to learn sports skills to assist leading healthier, more active lifestyles in later life.

### **C4 - Public Houses**

This policy seeks to provide protection to public houses which are important for their social, economic, cultural and historic value while ensuring that redevelopment or change of use is possible, subject to a set of criteria being met. Pubs can support Camden's social diversity by providing a valuable support function for communities of interest, such as the LGBT community. This is recognised within the policy.

### **C5 - Safety/Security**

Policy C5 seeks to improve safety within the borough through effective management of building uses and ensuring that safety is considered within the design of buildings and the public realm.

The policy is likely to benefit protected groups particularly affected by crime and fear of crime within the public realm. Men are at most risk from violent crime particularly 'stranger violence' which is likely to occur within the public realm. The policy seeks the use of active frontages to encourage pedestrian use and the use of management agreements for town centre uses with the potential to cause antisocial behaviour. Increased pedestrian use has the effect of deterring crime via natural surveillance (i.e. the more people there are in a particular place, the more likely a crime will be spotted and reported).

The LGBT community within Camden have also expressed concerns about 'stranger violence' particularly within Camden Town. Policy C5 will address this by seeking to ensure that an unsafe atmosphere is not created in Camden's Town Centres via the same means outlined above.

### **C6 – Access for all**

Good access benefits everyone. However, many people are disadvantaged by poor access to facilities and buildings and vulnerable and disadvantaged groups, such as the elderly, disabled people and pregnant women, can be particularly affected. Poor access can also be caused by difficulties in using the facilities themselves. The council will therefore expect all buildings and places to meet the highest practicable standards of access and inclusion.



As accessibility is influenced by perceptions as well as physical factors, the policy seeks to ensure that buildings are designed to appear, as well as be, accessible. Improvements to existing routes and footways will also be sought which will assist the needs of less mobile people.

In response to our Stage 2 consultation, a neighbourhood forum called for rail stations within Kentish Town to be step-free. Although the rail network operators are responsible for the delivery of projects of this nature, the project has been added to our Infrastructure Delivery Schedule for future consideration.

### **CC1 and CC2 - Sustainability and climate change mitigation**

Adapting to a changing climate is identified in Camden's environmental sustainability plan, Green Action for Change (2011-2020), the three key risks which require adaptation measures are flooding, drought and overheating. These risks impact on the health and well-being of Camden residents particularly more vulnerable groups such as the elderly, disabled and the young. The policy seeks to ensure that buildings are adaptable to climate change; however this will only impact those whose accommodation is being retrofitted or is a new building.

The application of the energy hierarchy and other design measures such as BREEAM aid in securing homes/buildings that have less reliance on non-renewable energy sources and cost less to run. This policy would help disadvantaged groups with fuel poverty, such as the elderly.

### **CC4 - Air Quality**

The policy seeks to mitigate against the impact of development on air quality and ensuring that exposure to poor air quality to new development is reduced. The main pollutants of concern are NO<sub>2</sub>, PM<sub>10</sub>, PM<sub>2.5</sub> and dust. Long term exposure to these pollutants is linked to cancer, heart disease, reduced lung function and respiratory disease. The policy has particular benefits for young and elderly people who have been identified as particularly sensitive to health problems caused by air pollution.

### **D1 - Design**

Good design is essential to create beautiful, sustainable, and inclusive places. Under this policy, the Council will require a high standard of design for all buildings and spaces in the borough. A key element of good design recognised in the policy is ensuring that buildings are accessible to all. Examples of features which improve accessibility could include wheelchair access, step free routes, way-finding and non-slip surfaces. Those less mobile, including older and disabled people will benefit particularly in this respect.

### **D2 - Heritage**

Camden has a wealth of heritage, including listed buildings and conservation areas. The policy therefore seeks to preserve or enhance heritage assets, including those identified on Camden's Local List.

Often, older buildings were not built with the interests of disabled people in mind. The policy however expects development to include solutions and have assessed all available options to improve accessibility which will provide benefits for disabled and older people in particular.

### **E1-E2 – Economy and jobs**

Camden has one of the most successful economies in the country: home to 24,000 businesses and over 300,000 jobs. The local economy includes a wide variety of employment sectors such as professional and business services, the knowledge economy (e.g. higher education and research), creative industries (e.g. design, fashion and publishing), health sector, hospitality, legal services and transport and distribution. The policy will seek to ensure that the space and infrastructure needs of businesses are met by protecting existing office and industrial employment spaces, directing the development of new employment space to growth areas and encouraging the development of the knowledge economy in particular.

The policy includes the requirement for larger schemes to provide an Employment and Training Strategy which will include details of how training and employment opportunities for local people will be incorporated into the scheme. Young people in particular are expected to benefit from apprenticeships resulting from developments, such as those provided by the Kings Cross Construction Skills Centre.

Supporting the knowledge economy could also provide further benefits. Included within this sector are higher education facilities, the growth of which will assist younger people to further their education within the borough. Medical and life science organisations also form a key part of Camden's knowledge economy. Advances in medicine as a resulting of supporting the needs of these organisations will provide

benefits for all and in particular disabled and older people.

### **G1 – Delivery and location of growth**

The Council seeks to create the conditions for growth to deliver the homes, jobs and facilities to meet Camden's identified needs and harnesses the benefits for those who live and work in the borough, so nobody gets left behind. This policy therefore sets out the general approaches to growth and specific locations to which growth will be focused including Kings Cross, Euston, Tottenham Court Road, Holborn, West Hampstead and areas identified for regeneration such as Gospel Oak and Somers Town.

Encouraging mixed use and higher density developments within this policy will be a benefit enjoyed particularly by less mobile groups such as older and disabled people and people with young children as it will increase accessibility to services.

The policy will further benefit Camden's children as the policy supports the aims of the Community Investment Programme (CIP) which aims to invest £117 million into 53 schools and children's centres. The Council also aims to provide 963 new school places, 420 delivered by CIP funding and 543 through council projects with investments from other sources. There are around 45,000 children and young people in Camden aged 19 and under: 21% of the total population.

Several growth areas such as Kings Cross and Holborn have also been identified within the policy as being able to deliver training and employment opportunities to local people. Under the policy, young apprentices could benefit from developer contributions towards schemes such as the Kings Cross Construction Skills Centre.

### **H1-H10 – Meeting housing needs chapter**

The Council will aim to secure a sufficient supply of homes to meet the needs of existing and future households by maximising the supply of housing and exceeding a target of 16,100 additional homes between 2015/16 and 2030/31. Under our housing policies this will be achieved by various means such as prioritising land for housing and promoting mixed use development so that non-residential schemes provide a contribution to self-contained housing. The Council has also set a target to deliver up to 50% affordable housing from larger schemes. In instances where there is an identified need, the usual models of affordable housing may also be substituted for accommodation for Gypsies and Travellers or specialist housing for older and/or disabled people including wheelchair and dementia friendly housing. Large developments will also be expected to provide opportunities for Gypsies and Travellers to acquire serviced plots (subject to viability).

Older, disabled people and young families will benefit in particular from our housing policies, particularly H6 which requires that 90% of new homes adopt Lifetime Home principles. Lifetime Homes are dwellings specifically designed to support the changing needs arising through a family's lifecycle, incorporating features to help accommodate pregnancy, prams and pushchairs, injury, disability, and old age. Furthermore, the council will expect the remaining 10% of homes to be wheelchair accessible.

The policies also seek to protect existing residential floor space and has included nursing homes, care homes or hospitals (where people live long-term) and accommodation for nurses and patients (who are no longer able to live independently) within this definition.

Housing in Multiple Occupation (HMOs) and social rented homes are also promoted and protected by the policy. HMOs are composed of residential units with shared facilities (such as kitchens and bathrooms) and generally can be rented at a lower cost than self-contained dwellings. Housing of this type provides an important source of accommodation for young people.

### **H11 – Accommodation for Travellers**

There are a number of Gypsy and Traveller households currently living in overcrowded conditions. Within this policy, the Council will therefore commit to deliver enough additional pitches to meet the needs of Camden's Gypsies and Travellers by 2020/21 and protect existing provision. New pitches will be expected to meet the needs of all other relevant policies within the local plan to ensure that Gypsy and Traveller people are integrated within the community.

### **T1 – Prioritising walking, cycling and public transport**

Policy T1 seeks to ensure that developments prioritise walking, cycling and public transport as the main means of travel to and from the site. Elements of the policy include the requirement to improve conditions for pedestrians and cyclists and to seek contributions towards the improvement of the bus network. The policy will be of particular benefit to young people and older people whom are more likely to be reliant upon the existing bus network.

## **T2 – Car free development and limiting the availability of parking**

The key aim of Policy T2 is that all new development within the borough should be car free. Car free development offers huge benefits to the borough including improving air quality, freeing up space to make more efficient use of land and making the environment friendlier to pedestrians and cyclists.

The policy still supports disabled parking where necessary, but groups traditionally reliant upon car use such as elderly people and people with young children, particularly in areas of lower public transport provision, may be negatively affected by the policy. Several representations to this effect were received in response to our Stage 2 consultation.

Camden however contains very few areas with poor/very poor Public Transport Accessibility Level (PTAL) ratings. Where low PTAL ratings have been identified, they are mainly located in the northern, less populated areas of the borough. These areas are also largely located within conservation areas and unlikely to experience large scale development.

It is estimated that at least 90% of Camden's existing housing stock has parking provision. Yearly additions to the housing stock equate to approximately 1% of total housing stock. During 2012/2013, however only 44% of all new housing completions were car free, representing the lowest proportion of car free housing since 2010. The vast majority of housing within the borough therefore already has existing parking provision.

The age structure of Camden also mainly consists of relatively young people of working age. There are proportionally more people aged between 19-49 compared to that of Greater London and nationally. Camden also contains a lower proportion of children aged under 16 compared to Greater London or England and Wales. When viewed in this context, it is likely therefore that only a small number of people will have their opportunities limited by this policy.

It should be noted that the Council already operates a car free policy under its existing Development Policy DP18, which applies to the Central London area, town centres and other areas regarded as having high levels of public transport provision. Large parts of the borough are therefore already subject to our car free approach.

## **TC1-TC6 - Town Centres and shops**

Camden's centres are a focus for activity and community life and provide character and identity to local areas and the borough as a whole. This policy seeks to protect the vibrancy and vitality of Camden's centres through measures such as protecting/promoting shops (particularly small units) and markets and managing concentrations of food/drink/entertainment premises.

Increasing the accessibility to shopping will be of particular benefit to less mobile groups such as disabled and older people and people with young children. As noted during our meeting with Camden's Reactive Forum during March 2015, a range of different types of shops and services within town centres is important so that they can be enjoyed by the whole family which these policies should foster. Markets can also help to meet the specialist food needs of ethnic communities who tend to make significantly more use of local markets than the general population.

Policy TC4 also seeks to restrict the location of hot food takeaways so that they cannot be located within 400m of secondary schools. Research suggests that proximity to energy dense fast food is one of a number of contributing factors to childhood obesity. The policy should therefore provide health benefits for young people by discouraging unhealthy eating habits.

## Equality impact summary

Protected group	Summarise any possible negative impacts that have been identified for each protected group and the impact of this for the development of the activity	Summarise any positive impacts or potential opportunities to advance equality or foster good relations for each protected group
Age	<p>A small number of older people and young families in areas of lower public transport provision may be negatively affected by a car free transport policy (T2). These people are likely to be less mobile and therefore more reliant upon car use.</p>	<p>All relevant policies contained within the Local Plan are considered to have positive impacts enjoyed by all ages. Older people will benefit particularly from policies to improve accessibility to services, health and amenity, namely:</p> <ul style="list-style-type: none"> <li>• Growth (G1)</li> <li>• Housing (H1-H10)</li> <li>• Town Centres (TC1-TC6)</li> <li>• Sustainability (CC1 and CC2)</li> <li>• Air Quality (CC4)</li> <li>• Open Space (A2)</li> <li>• Health (C1)</li> <li>• Heritage (D2)</li> <li>• Community facilities (C2)</li> <li>• Access (C6)</li> <li>• Walking, cycling, public transport (T1)</li> </ul> <p>Children and young people will also particularly benefit from all the above and the additional policies below:</p> <ul style="list-style-type: none"> <li>• Biodiversity (A3)</li> <li>• Economy (E1-E2)</li> <li>• Walking, cycling, public transport (T1)</li> </ul>
Disability	<p>The Local Plan is not expected to have a negative impact in relation to this protected group.</p> <p>Disabled people will remain unaffected by policy T2 which covers car free development as disabled parking bays are still required under this policy.</p>	<p>It is considered that the relevant policies within the Local Plan will have a positive impact on the quality of life of disabled people. Disabled people will benefit particularly from policies to improve accessibility to homes, services, health and amenity, namely:</p> <ul style="list-style-type: none"> <li>• Housing (H1-H10)</li> <li>• Town Centres (TC1-TC6)</li> <li>• Sustainability (CC1 and CC2)</li> <li>• Open Space (A2)</li> <li>• Health (C1)</li> <li>• Heritage (D2)</li> <li>• Access (C6)</li> <li>• Community facilities (C2)</li> <li>• Growth (G1)</li> <li>• Economy (E1-E2)</li> </ul>
Gender reassignment	<p>The Local Plan is not expected to have a negative impact in relation to</p>	<p>The Local Plan aims for overall improvements to the borough from</p>

	this protected group.	which people should benefit regardless of their current or previous gender.
Marriage and civil partnership	The Local Plan is not expected to have a negative impact in relation to this protected group.	The Local Plan aims for overall improvements to the borough from which all people should benefit regardless of their relationship status.
Pregnancy and maternity	The Local Plan is not expected to have a negative impact in relation to this protected group.	The Local Plan aims to secure additions and improvements to open space (A2) which will bring benefits to all sectors of society. Families and young people will be particular beneficiaries of this. Pregnant women and new families will also particularly benefit from the community facilities policy (C2) which seeks to protect and improve community and healthcare facilities and policy C6 which seek to improve levels of access.
Race	The Local Plan is not expected to have a negative impact in relation to this protected group.	The Local Plan aims for overall improvements in the borough from which people should benefit regardless of their race. Town Centre (TC1-TC6), Community facilities (C2) and cultural facilities (C3) policies in particular will support the needs of ethnic minority communities. Romany Gypsy or Irish Travellers are identified as racial groups under the Equality Act. The Local Plan contains a policy (H11) which specifically seeks to meet the needs of this group.
Religion or belief	The Local Plan is not expected to have a negative impact in relation to this protected group.	The Local Plan aims for overall improvements in the borough from which people should benefit regardless of their religion or belief. Faith and cultural facilities are protected (C2-C3) and new places of worship encouraged.
Sex	The Local Plan is not expected to have a negative impact in relation to this protected group.	The Local Plan aims for overall improvements to the borough from which all people should benefit regardless of their gender. The safety and security policy (C5) will help to address both the fear of crime (most commonly expressed by women) and being a victim of crime within the public realm (most commonly men).
Sexual orientation	The Local Plan is not expected to have a negative impact in relation to	The Local Plan aims for overall improvements to the borough from

	<p>this protected group.</p>	<p>which all people should benefit regardless of their sexual orientation.</p> <p>LGBT community should benefit in particular from Safety and Security (C5) as the policy should help alleviate concerns over personal safety and Public Houses policy (C4) which will protect meeting places associated with this group.</p>
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## Stage four - planning for improvement

### What actions have been identified:

- to mitigate against or minimise any negative impacts?
- to advance equality, and therefore improve the activity?

The assessment shows that protected groups are unlikely to be significantly negatively affected by the Local Plan.

A minority of people living within areas of lower public transport provision have been identified as potentially disadvantaged by the car free aims of policy T2. Policy T1 will however seek to increase the provision of public transport, particularly bus services which should help to mitigate the effects of car free development. Furthermore, car free development will enable land previously allocated to parking to be used more effectively. This could potentially provide essential services within much closer proximity to people.

Key to the successful delivery of the Local Plan will be on-going consultation with local people and groups, voluntary sector organisations, developers, businesses, councillors and council services to ensure that opportunities to advance equality will be identified and considered.

A final round of consultation will take place prior to the submission of a final draft for examination. Within the final round of consultation, we will seek to:

- re-consult organisations representing protected groups inviting comments on all policies within the draft Local Plan, particularly those representing Gypsies and Travellers.
- consult with organisations representing protected groups focusing upon issues highlighted within the Equalities Impact Assessment, particularly on the subject of car-free development in areas not already covered by DP18.

The council received an objection to Policy H11 from a group representing Gypsies and Travellers in response to Stage 2 of draft Local Plan consultation. The group argued that delivery of 7x pitches should be a minimum short term target (as opposed to 2x pitches) and that the methodology of the assessment informing this figure was inadequate.

Although in principle, the draft policy should deliver positive impacts for Camden's Gypsy and Traveller community, officers acknowledge that more could be done. The Council considers its Gypsy and Traveller housing assessment to be robust and therefore only minor changes were made to H11. Amendments were however made to the draft Policy H6 in response to the group's concerns requiring developers of large sites to provide opportunities for Gypsies and Travellers to acquire serviced plots.

In addition, prior to submitting a final draft of the Plan for to examination officers will:

- update the assessment of Gypsy and Traveller housing needs through consultation with the LGTU and the Gypsy and Traveller community.
- undertake a review of potential sites suitable for Gypsies and Travellers to ensure that enough sites can be made available in the short term.

It should be noted that once adopted, the Plan will be monitored on a regular basis. This will ensure that we identify and make any necessary changes if plan policies are not achieving the objectives and benefits intended.

## Stage five - outcome of the EIA

Outcome of analysis	Description	Select as applicable
Continue the activity	The EIA shows no potential for discrimination and all appropriate opportunities to advance equality and foster good relations have been taken	<input checked="" type="checkbox"/>
Change the activity	The EIA identified the need to make changes to the activity to ensure it does not discriminate and/ or that all appropriate opportunities to advance equality and /or foster good relations have been taken. These changes are included in the planning for improvement section of this form.	
Justify and continue the activity without changes	The EIA has identified discrimination and / or missed opportunities to advance equality and / or foster good relations but it is still reasonable to continue the activity. Outline the reasons for this and the information used to reach this decision in the box below.	
Stop the activity	The EIA shows unlawful discrimination.	
<p>Reasons for continuing with an activity when negative impacts or missed opportunities to advance equality have been identified.</p> <p><b>Not applicable.</b></p>		



## Stage six - review, sign off and publication

The EIA will be published alongside the Local Plan's Sustainability Appraisal for formal consultation. The document will be reviewed in light of the responses received.

### Sign off

The EIA must be quality assured within the directorate before sign-off by the service head / AD.

Quality assured by:	Ruth Craven, Senior Officer, Strategy and Change
Quality assured by OD for organisational change / restructures:	n/a
Signed off by:	Frances Wheat
Date:	22/12/2015
Comments (If any)	None

### Publication

If the activity will be subject to a Cabinet decision, the EIA must be submitted to committee services along with the relevant Cabinet report. Your EIA should also be published on Camden Data. All EIAs should now be uploaded to the [SharePoint site](#).

