

Camden Council Equality Impact Assessment Form

Camden Council Equality Impact Assessment Form

Before beginning this equality impact assessment (EqIA) form, you should use the [EqIA screening tool](#) to decide whether you need to complete an EqIA for your activity and read the [EqIA guidance](#).

The term “activities” is used by the Council to mean a range of things, such as policies, projects, functions, services, staff restructures, major developments or planning applications.

Most significant activities that affect Council stakeholders will require an EqIA when they are in the planning stage. Many will also require an EqIA to monitor their impact on equality over time or if there is a significant change that prompts a review, such as in local demographics.

EqIAs help the Council to fulfil its legal obligations under the Equality Act’s public sector equality duty. The duty requires the Council to have due regard¹ to the need to:

- eliminate unlawful behaviour, such as discrimination, harassment and victimisation;
- promote equality of opportunity between those who share a protected characteristic and those who don’t; and
- promote good relations between people who share a protected characteristic and those who don’t.

The way that we demonstrate that we have due regard for these three aims, and therefore that we are complying with the public sector equality duty, is by undertaking an EqIA.

EqIAs will almost certainly be required when a new activity affecting people who share the protected characteristics is being developed and when reviewing or changing such activities.

They will also be likely required before and during any staff re-organisations.

An EqIA should be started at the beginning of a new activity and developed in parallel with it. Activities such as services and projects should also be regularly reviewed for their impact.

An EqIA should be revisited and updated to determine whether any planned positive impacts have been achieved and whether any identified negative impacts have been mitigated. You can indicate the version of the EqIA below.

For more complex enquiries on EqIAs, in the first instance please contact equalities@camden.gov.uk where you will be able to receive dedicated support.

EqIAs should be signed off by the relevant sponsor, director or Head of Service.

¹ [Due regard](#) is a legal requirement and means that decision makers have to consider the equality implications of a proposal before a commissioning or policy decision has been made that may affect people who share each of the protected characteristics. Paying ‘due regard’ means giving a proportionate amount of resource to this analytical exercise relevant to the potential impact on equality.

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| Title of the activity | |
|---|-----------------------------------|
| Consultation on the Holborn Vison Supplementary Document (SC/2023/05) | |
| Officer accountable for the EqlA (e.g. director or project sponsor) | |
| Full name: | Richard Wilson |
| Position: | Strategic Lead – Design and Place |
| Directorate: | Supporting Communities |
| Email: | richard.wilson@camden.gov.uk |
| Lead person completing the EqlA (author) | |
| Full name: | George McKenzie |
| Position: | Senior Engagement Officer |
| Directorate: | Supporting Communities |
| Email: | George.mckenzie@camden.gov.uk |
| Person reviewing the EqlA (reviewer) | |
| Full name: | Jane Debono |
| Position: | Principal Planner |
| Directorate: | Supporting Communities |
| Email: | Jane.debono@camden.gov.uk |
| Version number and date of update | |
| 10 th January 2025 | |

Step 1: Clarifying aims

1.a Is it a new activity or one that is under review or being changed?

- New
 Under review
 Being changed

1.b. Which groups are affected by this activity?

- Staff
 Residents
 Contractors
 Other (please detail):

1.c Which Directorate does the activity fall under:

- Supporting People
 Supporting Communities
 Corporate Services
 More than one Directorate. Please specify:

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1.d Outline the aims/objectives/scope of the activity. (You should aim for a summary, rather than copying large amounts of text from elsewhere.)

Aims of the activity

In 2019 Camden Council consulted on a draft Holborn Vision and Urban Strategy Supplementary Planning Document (SPD). Its aim was to build on Holborn's strengths as a gateway for businesses and create a more vibrant and well-connected neighbourhood. Although most respondents agreed with the overall approach and objectives in the draft SPD, the response highlighted some key issues with the document. The intention was to amend the draft SPD in accordance with the response to the consultation and adopt the document as an SPD to the Camden Local Plan.

However, the Covid-19 pandemic forced a pause to the process and with uncertainties around funding for key projects including the Holborn Liveable Neighbourhood (HLN), a major streets and public realm transformation project, and planned improvement to Holborn underground station, both of which heavily impacted the 2019 SPDs public realm aspirations. There is now more certainty and although Transport for London (TfL) have disappointingly confirmed that Holborn Underground Station improvement project is not in its current programme, it has committed to fund concept design work for the Holborn Liveable Neighbourhood project.

In 2023 work on the Holborn Vision recommenced and a revised draft Holborn Vision (SPD) was produced that reflects the comments received on the previous version and responds to the impacts of the Covid-19 pandemic and reflects other policy since 2019. A report to the Cabinet Member for New Homes, Jobs and Community Investment was approved on 12th February 2024, with the recommendation for the Cabinet Member to consider and approve the draft Holborn Vision (SPD) for consultation in February and April 2024. The consultation aimed to capture feedback on the revised Holborn Vision (SPD) from local communities including residents, businesses and visitors in the Holborn Area, and organisations with an interest in the area.

Public consultation on the draft Holborn Vision (SPD) was approved and it ran successfully in February and April 2024. Analysis of the consultation has been undertaken and a summary report produced. Comments received have been incorporated into the final version of the document which is intended to be adopted as a supplementary planning document through a Single Member Decision by the Cabinet Member for Planning and a Sustainable Camden.

Purpose of the Equality Impact Assessment (EqIA)

This EqIA assesses the equality impact of the decision for Camden Council to run a public consultation and adopt the Holborn Vision as an SPD.

The draft Holborn Vision (SPD) was prepared alongside the work on the HLN, and consultation on the draft Holborn Vision and HLN ran in parallel through February and early March 2024. Consultation and engagement on the Holborn Vision and HLN was joined up and carefully coordinated to capture feedback from Camden's diverse communities living, working, visiting and with an interest in the area, through a variety

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of activities and events. These included physical engagement with targeted focus groups including residents on Tybalds Estate and with young people. There were focus groups including with parents and RNIB carers. Street pop-ups throughout the consultation area were held and exhibition days in Holborn library and community centres and Central District Alliance's offices.

The purpose of the engagement was to garner early public views, ideas and concerns on the project, and provide the opportunity to inform scheme design principles and priorities.

Draft Vision for Holborn:

Holborn's varied and distinctive character will be celebrated and enhanced through its thriving commerce, flourishing neighbourhoods, its culture and diversity. Its public realm will be transformed to create a connected, safer, greener and climate resilient environment for residents, workers and visitors.

Summary of consultation and engagement responses for the Holborn Vision and HLN

The draft Holborn Vision outlines six key objectives (HV1-HV6). Detailed information about each objective can be found in the SPD document and related consultation materials. A summary of the responses received for each objective is provided below and is available in the Holborn Vision consultation Summary report, December 2024.

HV1: A Place of Innovation that Continues to Foster Business and Commerce

Insights include a request for business growth to be balanced with community welfare, specialist businesses, and support for areas to be protected, such as Hatton Garden. Further insights include the need to prioritise access, connectivity and enhanced footfall to support business activity by some.

HV2: Creating Vibrant Mixed-Use Neighbourhoods

The engagement responses to HV2 reflect a community whose priority is on supporting guidance that facilitates vibrant, inclusive, and safe mixed-use neighbourhoods that balance commercial needs with community wellbeing.

HV3: Addressing Local Population Needs

The engagement responses to HV3 welcome a holistic approach to developing a Vision that prioritises housing, addresses homelessness, strengthens social infrastructure, and ensures the availability of affordable shops and services.

HV4: Improving Public Spaces

The engagement responses to HV4 highlight a positive response to enhance public spaces through increased greenery, better seating, pedestrian-friendly areas, effective wayfinding, and improved transport options. Concerns here focussed on ensuring that guidance supports spaces that can be well maintained, whilst ensuring that impact on traffic is mitigated.

HV5: Creating a Climate-Resilient Holborn

The engagement responses to HV5 were positive towards a climate-resilient Holborn, mostly focusing on greening and wellbeing. Managing traffic was seen to be key to improving air quality. Other issues raised include guidance to optimise waste management practices.

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HV6: Celebrating Holborn's Distinctive Character

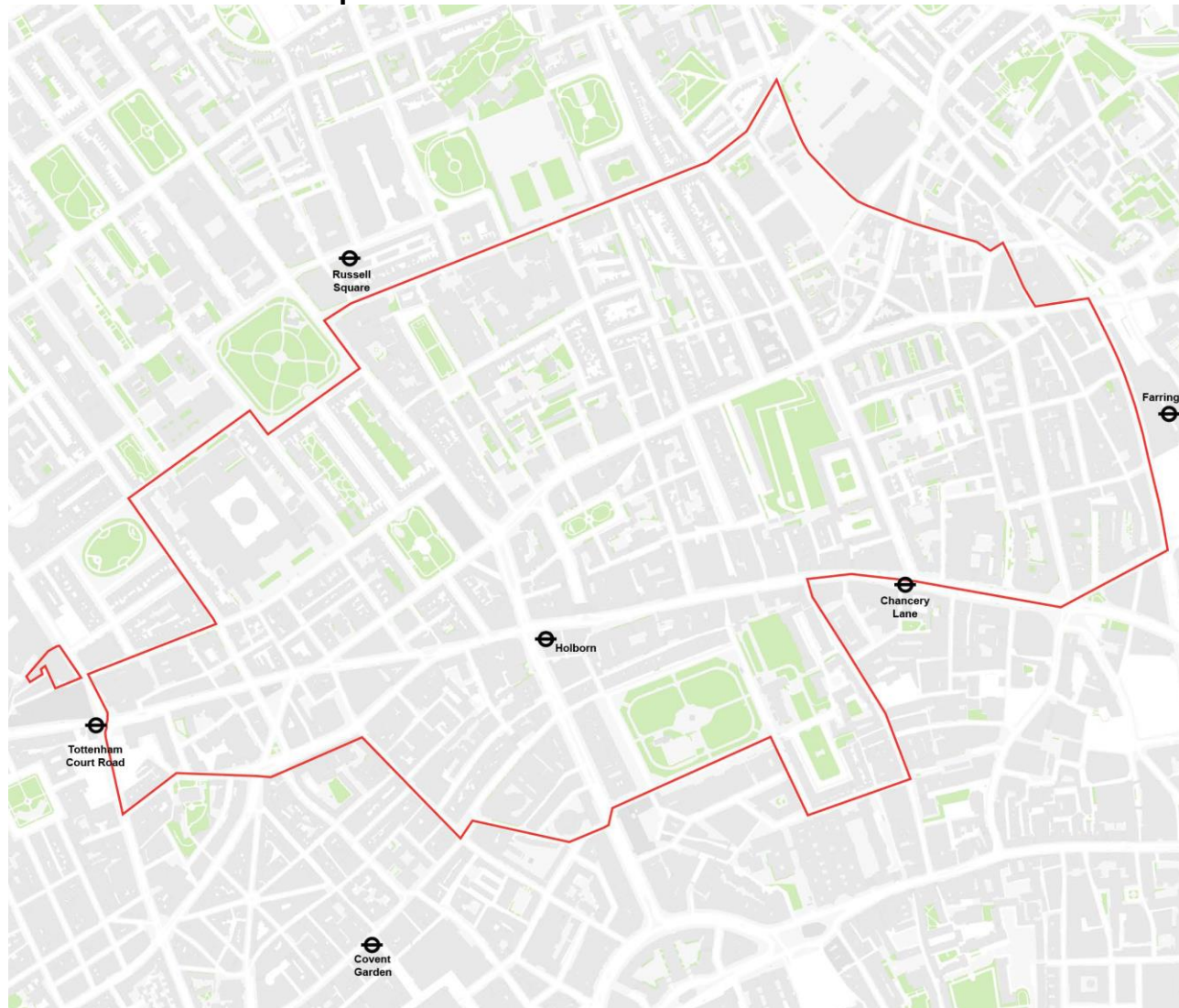
The engagement responses to HV6 highlight the community's priority in calls to strengthen the guidance on preserving, enhancing and celebrating Holborn's distinctive character through thoughtful development and historic preservation. Additional calls included an ask to support creative design, improved wayfinding, and the creation of public spaces that reflect local identity.

Although this EqIA is focussed on the Holborn Vision, there are some overlapping themes with the HLN feedback:

- Traffic and Access: Concerns were raised about traffic disruption, movement, and access, including issues such as congestion, detours, and difficulty for pedestrians, cyclists, and drivers to navigate the area.
- Greenery and Open Space: There was widespread support for increased greenery, nature, and open spaces.
- Safety Concerns:
 - Road User Interactions: Respondents expressed concern about potential conflicts between different road users at junctions, particularly pedestrians, people with a disabilities, parents with prams and cyclists.
 - Floating Bus Stops: Safety concerns were raised regarding pedestrians crossing the cycle lane to access the bus, potentially colliding with cyclists travelling at higher speeds.
 - Crime and Anti-Social Behaviour (ASB): Concerns were raised regarding potential increases in crime and anti-social behaviour, particularly in areas where there could potentially be more seating and open spaces.
- Long-Term Maintenance: Concerns were raised regarding the upkeep of green spaces, footways and other proposed elements.
- Wayfinding and Lighting: Support for improved wayfinding signage and lighting, which could contribute to better navigation and a more user-friendly environment.
- Character Celebration: People value the idea of incorporating elements that celebrate the area's unique character.
- Licensing: Concerns were raised regarding business licensing specifically.

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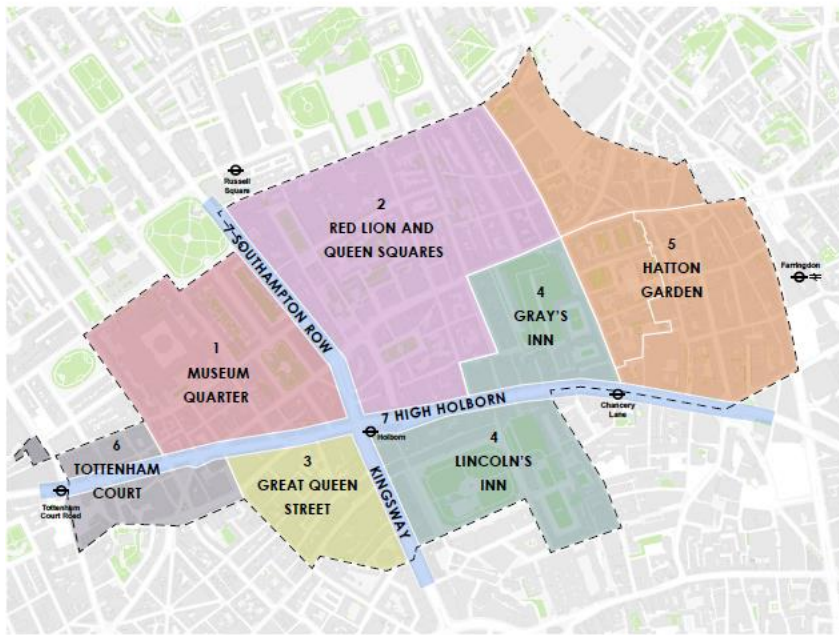
Holborn Vision Area Map



Character Areas approach

The Holborn Vision takes an area-based approach in order to respond to Holborn's diverse mix of neighbourhoods. To reflect this and in order to respond to local context, the Holborn Vision document sets out seven distinct character areas, shown in the map below:

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Detailed insights for each character area is available in the Holborn Vision Consultation Summary report, December 2024.

Continue on next page if more space is needed.

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Step 2: Data and evidence

What data do you have about the people affected by the activity, for example those who use a service? Where did you get that data from (existing data gathered generally) or have you gone out and got it and what does it say about the protected characteristics and the other characteristics about which the council is interested?

Is there currently any evidence of discrimination or disadvantage to the groups?

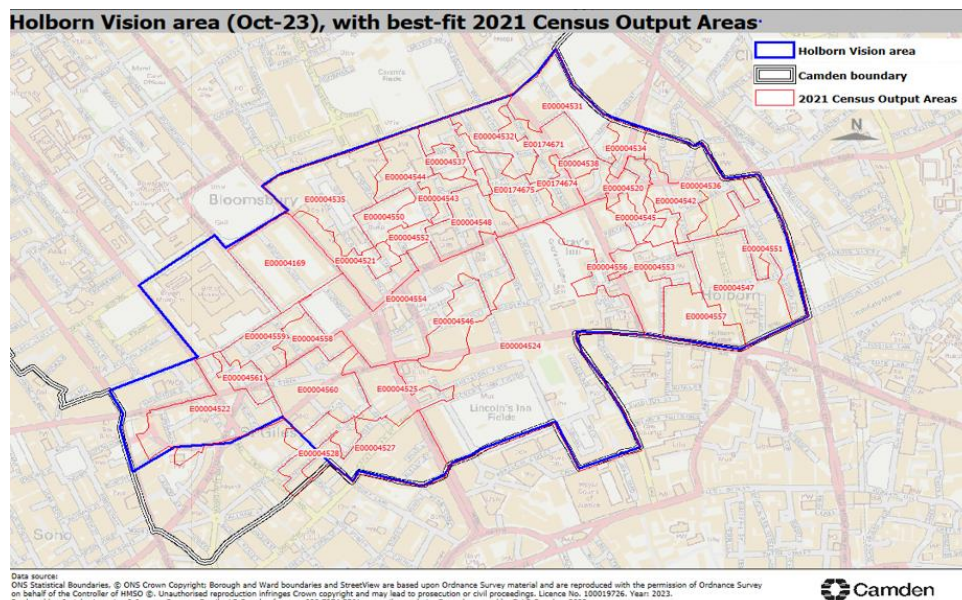
What will the impact of the changes be?

You should try to identify any data and/or evidence about people who have a **combination, or intersection, of two or more characteristics**. For example, homeless women, older disabled people or young Black men.

2.a Consider any relevant data and evidence in relation to all Equality Act protected characteristics:

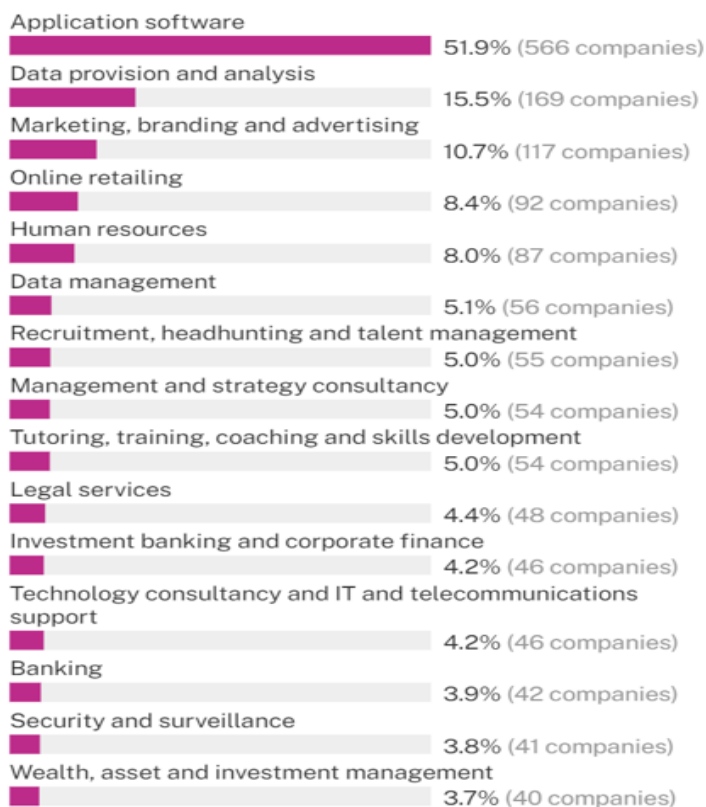
- Age
- Disability, including family carers²
- Gender reassignment³
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

To best represent the Holborn Vision area, relevant data and evidence related to all Equality Act protected characteristics have been aggregated for the combined lower super output areas (LSOAs) depicted in the map below as the best fit for the boundaries of the Vision. The data available is on all residents.

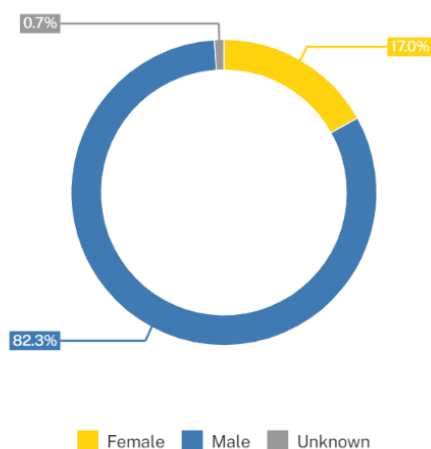


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Demographic data on businesses and the protected characteristics of business owners, employers, employees and business users is not readily available. However, for information, the Beauhurst Business database provides up to date information of companies whose head office and or registered address is in Holborn and Covent Garden and are active on Companies House. The search for Holborn and Covent generated a total of 1090 companies with multiple industries. According the Beauhurst database, the top 15 industry ranking of businesses in Holborn and Covent Garden are:



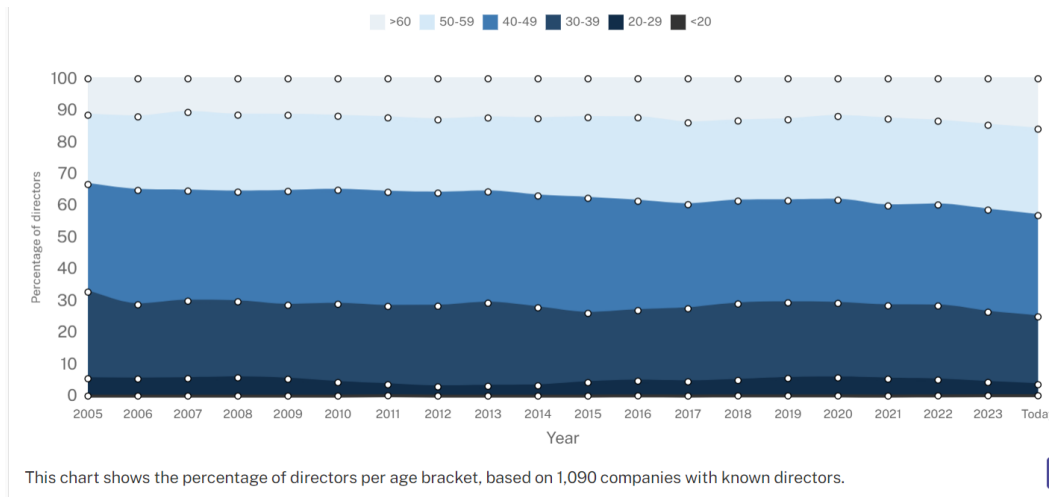
Gender of founders



Based on 1,533 founders at 1,090 companies. This chart shows the percentage of founders that are male, female, or unknown. Unknown is used where there is no gender data available.

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Directors age over time

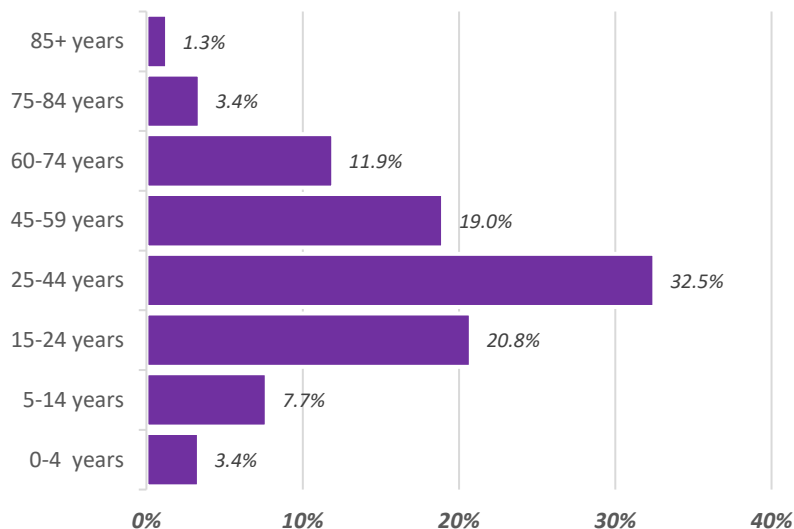


Age

| Age | Area No | Area % | Camden % |
|------------|---------|--------|----------|
| All People | 10,507 | 100 | 100% |
| 0-4 | 353 | 3.4 | 4.8 |
| 5-14 | 809 | 7.7 | 9.6 |
| 15-24 | 2181 | 20.8 | 16.1 |
| 25-44 | 3416 | 32.5 | 35 |
| 45-59 | 1995 | 19 | 18.3 |
| 60-74 | 1255 | 11.9 | 10.9 |
| 75-84 | 359 | 3.4 | 3.9 |
| 85+ | 139 | 1.3 | 1.5 |

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Usual Residents by Age Group



The age distribution of Holborn residents closely resembles the borough’s overall profile, based on the latest census data. The largest age groups are 25-44 (32.5%), 15-24 (20.8%), and 45-59 (19%). Notably, the 15-24 age group is 4.7% larger than the borough average.

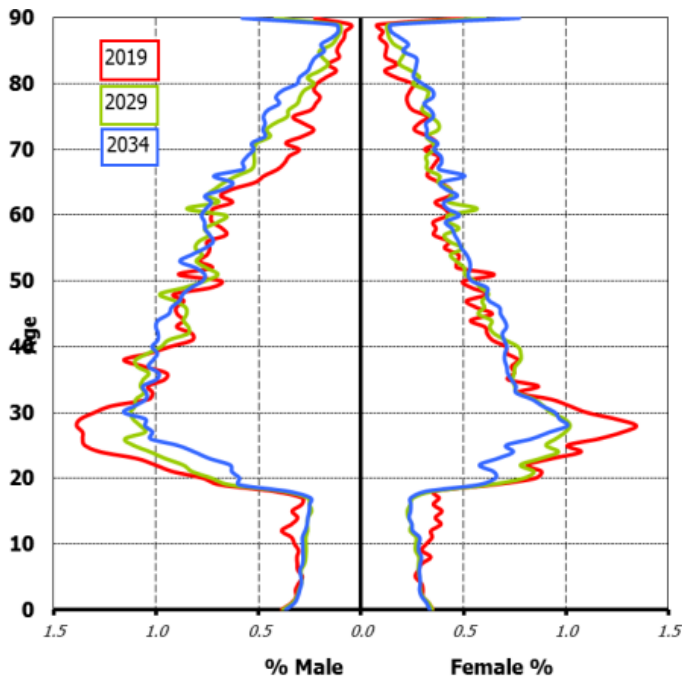
Several local groups within the area cater specifically to the needs of older adults. These organisations including the Holborn Community Association, Mary Ward Club and Miliman Street Community Association, provide a diverse range of services encompassing; health and fitness, social activities and lifelong learning. The Older Feminist Network (national network for older women who have feminist perspectives) is a local organisation.

There are several local groups dedicated to serving the needs of young people in the area. These include Covent Garden Dragon Hall Trust, Coram’s Fields Youth Centre, Local community centres and Springboard Charity. These groups offer a range of services, including youth clubs, activities, scouting programs, and support services.

Youth Group Limited (Youth Group.com), based on nearby Sheldon Street, empowers young people to find work, earn money, and develop valuable skills. Partnering with top global brands, they also offer mentorship opportunities.

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Age & Sex Structure of Holborn and Covent Garden Ward: 2019, 2029 & 2034



Source: GLA 2017-based Projections 'Camden Development, Capped AHS', © ONS, 2019.

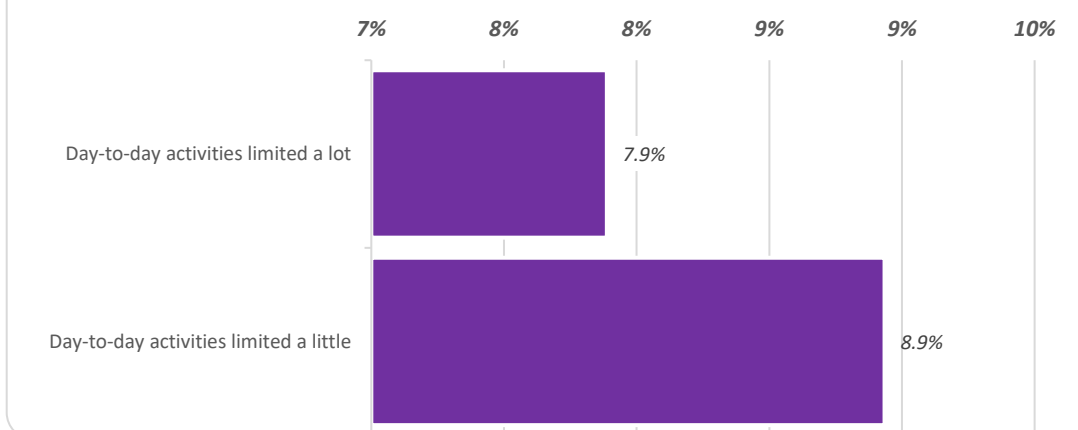
The chart shows the age and sex structure changes over time. The red lines show the percentage of the population by age in 2019, green shows 2029 and blue shows 2034. Over the projected period, the Holborn and Covent Garden population has smaller proportions of children and teenagers aged under 18, smaller proportions of younger adults aged 18-32; and larger proportions of adults aged 60+

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Disability, including family carers

| Disabled under the Equality Act | Area No | Area % | Camden % |
|--|---------|--------|----------|
| Total | 1,768 | 16.8% | 15.2% |
| Day-to-day activities limited a lot | 829 | 7.9% | 6.7% |
| Day-to-day activities limited a little | 939 | 8.9% | 8.5% |
| Not disabled under the Equality Act | | | |
| Total | 8,742 | 83.2% | 84.8% |
| Has long term physical or mental health condition, but day to day activities are not limited | 599 | 5.7% | 5.7% |
| No long term physical or mental health condition | 8,143 | 77.5% | 79.1% |

Disabled under the Equality Act



Holborn's disability distribution reflects borough-wide proportions. Residents with disabilities significantly limiting daily activities under the Equality Act comprise 7.9% of the population in Holborn, compared to 6.7% borough-wide. Similarly, 8.9% of Holborn residents experience some limitations in daily activities due to a disability under the Equality Act, compared to 8.5% borough-wide. Notably, Holborn has a slightly lower proportion (5.7%) of residents with limitations not covered by the Equality Act, mirroring the borough wide proportion.

City Lit Centre for Deaf Education is based on Keeley Street in Holborn and provides courses for deaf adults including English, Maths and computing. City Lit Learning Disability also based on Keeley Street provide part time courses for adults with learning disabilities for all London Boroughs.

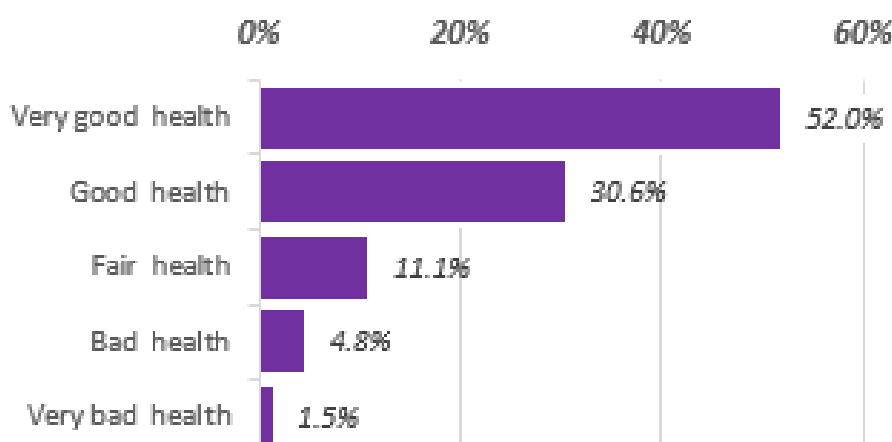
Action Space in Northington Street work with learning disabled artists across London as a Creative Hub, Supported Studio and Artist Development Agency.

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General Health

| General Health | Area No | Area % | Camden % |
|------------------|---------|--------|----------|
| All People | 10,502 | 100% | 100% |
| Very good health | 5,463 | 52.0% | 55.5% |
| Good health | 3,210 | 30.6% | 29.3% |
| Fair health | 1,164 | 11.1% | 10.0% |
| Bad health | 503 | 4.8% | 3.8% |
| Very bad health | 162 | 1.5% | 1.3% |

General Health



The General Health distribution of local residents broadly mirrors the borough's overall profile, with some notable differences. 52% of Holborn residents report very good health, compared to 55% borough-wide. Residents who report good health is similar, with 30.6% in the Holborn Area with a marginally smaller proportion borough-wide. Residents who report fair health is slightly higher in Holborn at 11.1%, compared to 10% borough-wide. The proportion of residents who report poor health is slightly higher in the area (6.3%) compared to borough-wide (5.1%).

Holborn offers a comprehensive range of healthcare services and facilities catering to diverse needs.

- Hospitals and Medical Centres include:
 - Great Ormond Street Hospital for Children: World-renowned for treating a wide spectrum of paediatric medical conditions, including mental health.
 - National Hospital for Neurology and Neurosurgery, Queen Square: A specialist institution within the UCL Hospitals NHS Foundation Trust, dedicated exclusively to neurological disorders.
 - Holborn Medical Centre: Provides comprehensive NHS primary care services to support residents' health and well-being.
- Additional Healthcare include:
 - Beyond traditional medicine, Holborn has a variety of alternative healthcare options, including massage therapists, acupuncturists, and homeopaths.
 - A significant number of dentists are readily available to address oral health needs.
- Fitness Options include:

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- Holborn caters to a range of fitness preferences. Public facilities like the Oasis Sports Centre, on the Vision boundary, managed by the Better Charity, offer accessible options. Additionally, private gyms such as Gymbox and Coach Gyms provide diverse training environments.

Provision of unpaid care

| | Area No | Area % | Camden % |
|---|---------------|---------------|---------------|
| Provision of unpaid care | | | |
| All usual residents aged 5+ | 10,149 | 100.0% | 100.0% |
| Provides no unpaid care | 9,345 | 92.1% | 92.7% |
| Provides 9 hours or less unpaid care a week | 292 | 2.9% | 2.9% |
| Provides 10 to 19 hours unpaid care a week | 129 | 1.3% | 1.0% |
| Provides 20 to 34 hours unpaid care a week | 81 | 0.8% | 0.8% |
| Provides 35 to 49 hours unpaid care a week | 89 | 0.9% | 0.8% |
| Provides 50 or more hours unpaid care a week | 213 | 2.1% | 1.8% |

The distribution of unpaid care provision in Holborn for residents aged 5 and over largely mirrors the borough-wide distribution. A significant proportion of Holborn residents (92.1%) provide no unpaid care. This is marginally lower than the borough-wide proportion of 92.7%.

Among those who do provide care, the largest proportion in both Holborn (2.9%) and the wider borough (2.9%) dedicate 9 hours or less per week. However, Holborn has a notably higher proportion of residents providing 50 hours or more of unpaid care per week (2.2%) compared to the borough-wide proportion (1.8%).

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Gender reassignment

| Gender Identity | | Ref date | Area No | Camden | Greater London | England |
|--|---|-----------|---------------|----------------|------------------|-------------------|
| All Resident | | | 10,361 | 210,134 | 4,268,095 | 56,490,048 |
| | Gender ID the same as sex registered at birth | 21 Mar-21 | 90.1% | 91.0% | 91.2% | 93.5% |
| Gender Identity was a voluntary question asked only to people aged 16+ | Gender identity different from sex registered at birth but no specific identity given | | 0.4% | 0.3% | 0.5% | 0.2% |
| | Trans woman | | 0.1% | 0.1% | 0.2% | 0.1% |
| | Trans man | | 0.2% | 0.1% | 0.2% | 0.1% |
| | All other gender identities | | 0.2% | 0.2% | 0.1% | 0.1% |
| | Not answered | | 9.0% | 8.2% | 7.9% | 6.0% |

The majority of Holborn residents gender identity is the same as sex registered at birth (90.1%), closely reflecting the borough-wide proportion of 91.0%.

A small proportion of Holborn residents (0.4%) identify with a gender identity different from sex assigned at birth but no specific identity given. This is marginally higher than the borough-wide proportion of 0.3%.

Holborn has a slightly larger proportion of transgender men (0.2%) compared to the borough average (0.1%). Conversely, the proportions of transgender women in Holborn and borough-wide are identical (0.1%).

The London Transgender Meetup Group provides fun, friendly, and inclusive meetups for all trans people in London, held regular at various locations.

Organisations serving transgender and gender-diverse individuals often extend their services to the broader LGBTQ+ community.

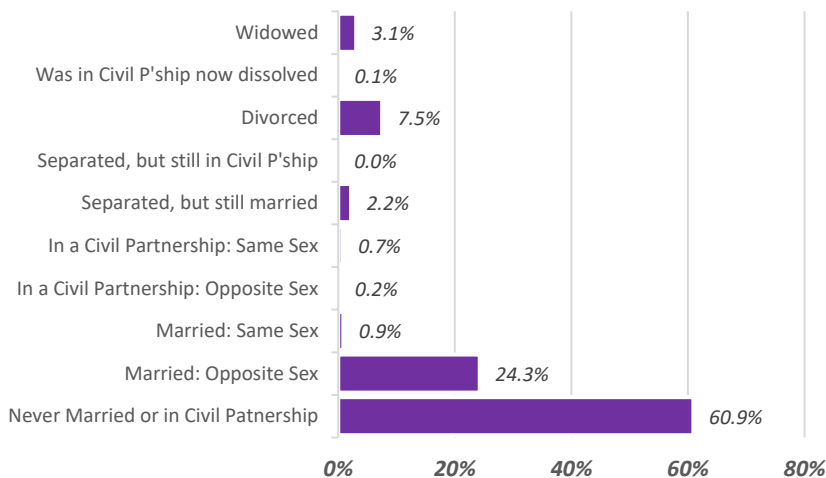
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Marriage and civil partnership

Legal Partnership Status

| Legal Partnership Status | Area No | Area % | Camden % |
|--|--------------|-------------|-------------|
| All Residents Aged 16+ | 9,273 | 100% | 100% |
| Never Married or in Civil Partnership | 5,650 | 60.9% | 55.7% |
| Married: Opposite Sex | 2,251 | 24.3% | 30.2% |
| Married: Same Sex | 81 | 0.9% | 0.6% |
| In a Civil Partnership: Opposite Sex | 19 | 0.2% | 0.2% |
| In a Civil Partnership: Same Sex | 68 | 0.7% | 0.4% |
| Separated, but still married | 202 | 2.2% | 2.2% |
| Separated, but still in Civil P'ship | 4 | 0.0% | 0.0% |
| Divorced | 697 | 7.5% | 7.3% |
| Was in Civil P'ship now dissolved | 10 | 0.1% | 0.1% |
| Widowed | 284 | 3.1% | 3.3% |
| Surviving partner from Civil Partnership | 7 | 0.1% | 0.0% |

Legal Partnership status



Marital status in Holborn differs slightly from the borough average. The largest proportion of Holborn residents (60.9%) have never married or been in a civil partnership. This is notably higher than the borough-wide proportion (55.7%).

Conversely, a smaller proportion of Holborn residents (24.3%) are married to someone of the opposite sex compared to the borough average (30.2%).

The proportion of residents married to someone of the same sex is marginally higher in Holborn (0.9%) compared to borough-wide (0.6%). Similarly, a marginally larger proportion of Holborn residents are in a civil partnership with someone of the same sex (0.7%) compared to the borough-wide proportion (0.4%).

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Pregnancy and maternity

Information on pregnancy and maternity is available for Camden Borough which provides comprehensive pregnancy and maternity services throughout the borough. In the year ending mid-2021, there were 2,266 births recorded to Camden-resident mothers. Since 2011-12, annual births in Camden have decreased by 27%. This decline is part of a broader national (-16%) and London (-18%) trend, but Camden has experienced one of the most significant reductions in birth rates in the city over the past decade (6th largest fall in birth rates).

Camden's low fertility rate could be attributed to several factors, including its large student population (61% female), high cost of family accommodation, and broader societal factors such as welfare reform, short-term lettings, Brexit, and economic uncertainties.

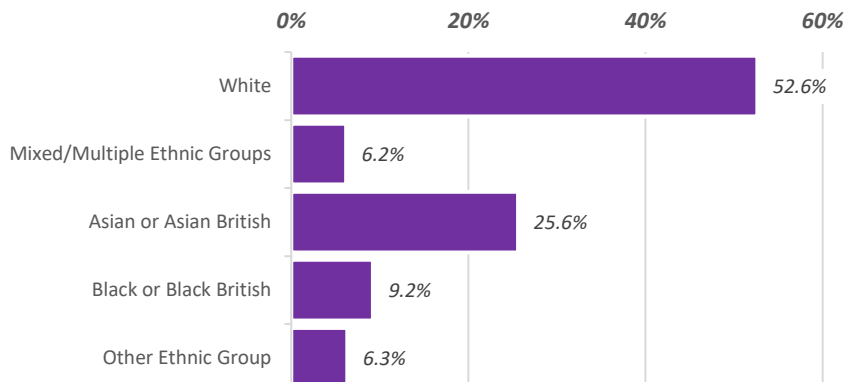
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Race

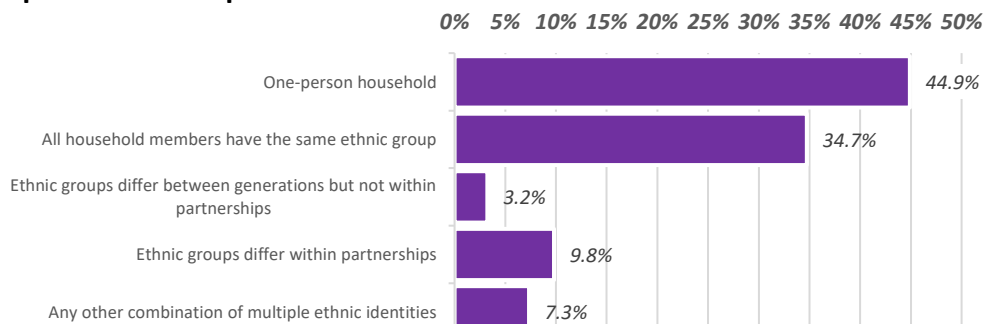
| Age | Area No | Area % | Camden % |
|--|---------------|--------------|--------------|
| All usual residents | 10,519 | 100% | 100% |
| White | 5356 | 52.6% | 59.5% |
| Mixed / Multiple Ethnic Groups | 652 | 6.2% | 6.6% |
| Asian or Asian British | 2694 | 25.6% | 18.1% |
| Black or Black British | 970 | 9.2% | 9.0% |
| Other Ethnic Group | 667 | 6.3% | 6.8% |
| | | | |
| Black, Asian and minority ethnic groups | 4983 | 47.4% | 40.5% |
| All Minority Ethnic Groups | 7297 | 69.4% | 64.6% |
| | | | |
| Detailed ethnic groups | | | |
| White | | | |
| English/Welsh/Scottish/Northern Irish/British | 3222 | 30.6% | 35.4% |
| Irish | 212 | 2.0% | 2.5% |
| Gypsy or Irish Traveller | 4 | 0.0% | 0.1% |
| Roma | 55 | 0.5% | 0.5% |
| Other White | 2043 | 19.4% | 21.1% |
| | | | |
| Multiple / Mixed Ethnic Groups | | | |
| White and Black Caribbean | 103 | 1.0% | 1.2% |
| White and Black African | 102 | 1.0% | 1.0% |
| White and Asian | 186 | 1.8% | 2.0% |
| Other Mixed | 261 | 2.5% | 2.4% |
| | | | |
| Asian / Asian British | | | |
| Indian | 258 | 2.5% | 3.3% |
| Pakistani | 74 | 0.7% | 0.8% |
| Bangladeshi | 1,360 | 12.9% | 6.8% |
| Chinese | 638 | 6.1% | 3.2% |
| Other Asian | 364 | 3.5% | 4.0% |
| | | | |
| Black / African / Caribbean / Black British | | | |
| African | 749 | 7.1% | 6.8% |
| Caribbean | 111 | 1.1% | 1.3% |
| Other Black | 110 | 1.0% | 1.0% |
| | | | |
| Other ethnic group | | | |
| Arab | 225 | 2.1% | 2.1% |
| Any other Ethnic Group | 442 | 4.2% | 4.8% |
| | | | |

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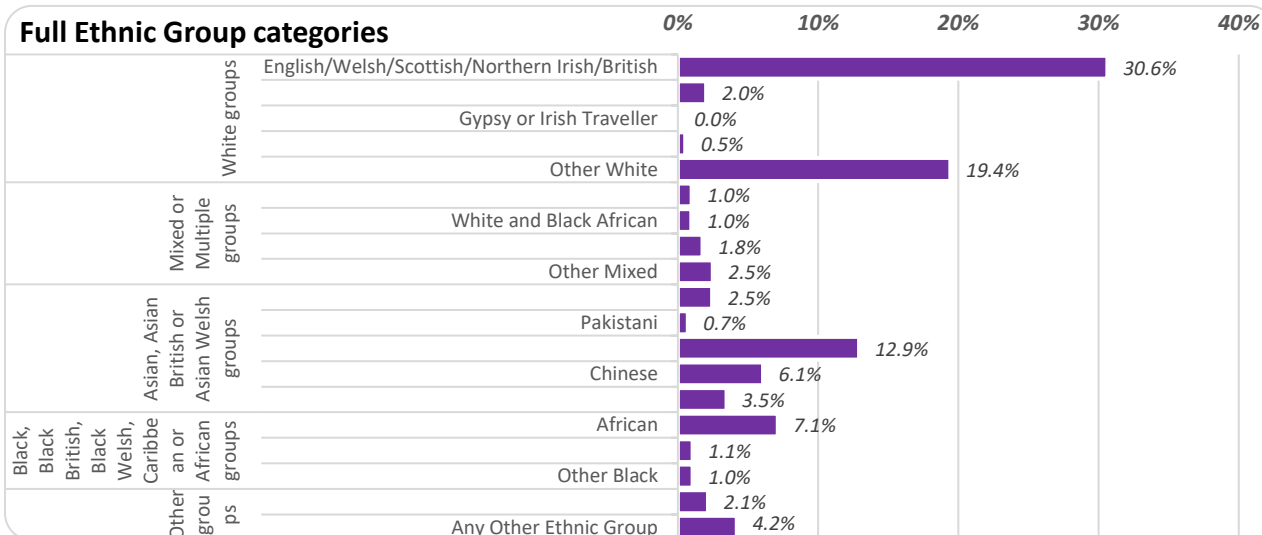
Summary Ethnic Groups



Multiple Ethnic Groups in Household



Full Ethnic Group categories



Holborn’s ethnic makeup differs from the wider borough.

White residents make up 52.6% of the population, a lower proportion compared to the borough-wide proportion of 59.5%. The largest subgroup (30.6%) identifies as English/Welsh/Scottish/Northern Irish/British, which is also lower than the borough’s 35.4%. ‘Other White’ residents form the second largest subgroup within this category at

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19.4%, marginally lower than the borough's 21.1%. While the Census does not provide a specific breakdown for this category, trends suggest a significant proportion may have Eastern European or other European backgrounds.

The second largest ethnic group in Holborn is Asian or Asian British (25.6%), larger than the borough's proportion of 18.1%. Bangladeshi residents form the largest subgroup within this category at 12.9%, significantly higher than the borough's 6.8%. The Chinese community follows as the third largest Asian/Asian British group in Holborn at 6.1%, significantly larger than the borough-wide proportion of 3.2%.

Black/Black British residents make up 9.2% of Holborn's population, representing the third-largest ethnic group. This proportion is nearly identical to the borough-wide proportion of 9.0%.

Holborn Community Association provides an information service for Bangladeshi women and families. Holborn Community Association works in partnership with Tybalds and Bourne Estates to host classes for local children to get free extra after-school support in science, technology, engineering and maths. 85% of participants have South Asian Ethnicity.

Holborn Muslim Community and Welfare association is a mosque situated at 33 Brookes Court and conducts outreach to support the local Muslim community.

Religion or belief

| All usual residents (inc 'no religion'/'not answered') | Area No | Area % | Camden % |
|--|---------|--------|----------|
| | 10,494 | | |
| Christian | 3,385 | 32.2% | 31.4% |
| Buddhist | 126 | 1.2% | 1.1% |
| Hindu | 130 | 1.2% | 1.9% |
| Jewish | 116 | 1.1% | 4.8% |
| Muslim | 2,088 | 19.8% | 16.1% |
| Sikh | 17 | 0.2% | 0.2% |
| Other religion | 74 | 0.7% | 0.9% |
| No religion | 3,584 | 34.1% | 34.6% |
| Not answered | 974 | 9.3% | 8.9% |

Christianity is the most common religion in Holborn, with 32.2% of residents identifying as Christian. This is slightly higher than the borough-wide proportion of 31.4%.

Islam is the second most prevalent religion in Holborn, with 19.8% of residents identifying as Muslim. This is also higher than the borough-wide proportion of 16.1%.

Other religions make up smaller percentages of Holborn's population and are similar to the borough's overall statistics. However, Judaism is an exception. While 4.8% of residents borough-wide, identify as Jewish, only 1.1% of Holborn residents do, which represents a significantly lower proportion.

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The largest category in Holborn is “no religion,” with 34.1% of residents identifying this way. This closely mirrors the borough wide proportion of 34.6%.

Holborn has a diverse faith landscape catering to a variety of religious traditions.

Christianity: Anglican churches include St George’s Church located at the South End of Queen’s Square and St Giles in the Fields – between Covent Garden, Bloomsbury and Fitzrovia, while St Etheldreda’s Church off Charterhouse Street represents the Roman Catholic denomination. Additionally, St Peter’s Italian Church in closer to Clerkenwell caters to a specific cultural tradition within Christianity. The presence of St Clements Danes Church of England Primary School and St Albans Church of England Primary School further reflects the Christian presence in the area.

Islam: British Muslims for Secular Democracy, located on Museum Street, addresses the needs of the Muslim community through grassroots workshops and projects targeted towards young Muslims and Muslim refugees. Holborn Muslim Community and Welfare association is a mosque situated at 33 Brookes Court.

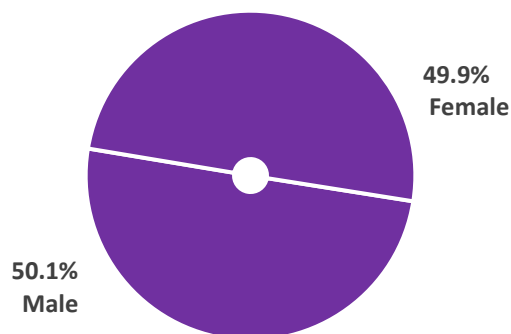
Judaism: While geographically located in Bloomsbury Square adjacent to Holborn, Jewish Community Information serves the Jewish community by providing resources on various aspects of Jewish life. The League of Jewish Women, a charitable organization based in Bloomsbury Square, contributes to the wider community through volunteer work.

Paganism: The Pagan Federation North London, situated on Opal Street, promotes accessibility to Paganism for individuals seeking a nature-based spiritual path.

Sex

| Sex | Area No | Area % | Camden % |
|------------|---------|--------|----------|
| All People | 10,504 | 2,958 | 100% |
| Male | 5265 | 47% | 47.3% |
| Female | 5239 | 53% | 52.7% |

Usual Residents by Sex



The distribution of local people by sex (male/female) is almost identical to the borough wide profile. (47% male / 53% female).

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Sexual orientation

| Sexual Orientation | Reference Date | <i>Holborn & Covent Garden %</i> | <i>Camden %</i> |
|-------------------------------|----------------|--------------------------------------|-----------------|
| Straight or Heterosexual | 21 Mar-21 | 80.3% | 82.6% |
| Gay or Lesbian | | 5.8% | 3.7% |
| Bisexual | | 2.2% | 2.5% |
| All other sexual orientations | | 0.6% | 0.7% |
| Not answered | | 11.1% | 10.5% |

The Census provides data on sexual orientation for residents aged 16+ in Holborn and Covent Garden ward. Participants in this portion of the census was voluntary.

The data reveals a majority heterosexual population, mirroring the borough. However, a notable difference exists in the proportion of residents identifying as gay or lesbian. In Holborn and Covent Garden ward, 5.8% of residents identify as gay or lesbian, compared to 3.7% borough-wide. This represents a significantly larger proportion within the ward.

Situated in Central London, Holborn residents have access to a wealth of resources catering to the LGBTQ+ community. While Holborn itself may not have a vast number of dedicated LGBTQ+ organisations, Central London as a whole offers a vibrant network. These organisations provide essential services, including counselling, housing support, educational programs, and sexual health services.

Forum + (Camden’s LGBTQ+ Forum) aims to provide an official channel of communication and influence between Camden’s (LGBTQ+) community and organisations that are responsible for ensuring community safety. It provides a non-police reporting site for incidents and addresses, acts and advises on specific community safety needs. Forum + provides a crime hotline, to Camden Police Community Safety Unit to allow victims of attacks to report incidents anonymously. In addition Forum + offers support, events and activities for LGBTQ+ individuals in Camden. This includes social groups, well-being programs, and advice for accessing local services.

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Intersectional Groups

Data for intersectional groups is limited. There is however evidence to suggest that life expectancy and health in Camden for different groups vary on the basis of a number of protected characteristics including age, gender and ethnicity.

2.b Consider evidence in relation to the additional characteristics that the Council is concerned about:

- Foster carers
- Looked after children/care leavers
- Low-income households
- Refugees and asylum seekers
- Parents (of any gender, with children aged under 18)
- People who are homeless
- Private rental tenants in deprived areas
- Single parent households
- Social housing tenants
- Any other, please specify

Foster carers

Information about Foster Carers is available for the Camden Borough.

The Children's Safeguarding and Social Work Service's Full Year Performance Assessment Management Information Report (March 2023) provides data on foster care within the Camden Borough. As of the end of March 2023, 120 children were placed in foster care, reflecting a 20% increase compared to the 100 children in care at the end of March 2022.

The report also provides a breakdown of the foster carer placements:

- **Camden Carers:** 56 children (46.7%) were placed with foster carers residing within the Camden Borough itself.
- **External Agencies and Local Authorities:** 41 children (34.2%) were placed with carers through independent fostering agencies, voluntary organizations, or local authorities outside of Camden.

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- **Relatives or Friends:** 23 children (19.2%) were placed with relatives or friends who had been approved by Camden's fostering service.

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Looked after children/care leavers

Data from the Children's Safeguarding and Social Work Service's Full Year Performance Assessment Management Information Report (March 2023) shows that on March 31st, 2023, there were 197 children looked after by Camden. The report also details that 127 children exited care during the year 2022/23.

Low-income households

A household is considered low-income if its annual income falls below 60% of the median income for the area. In Camden, the median income is £41,342, meaning a low-income household earns less than £24,806 per year (60% of £41,342). Data shows that 21.7% of Camden households fall within this low-income category.

In Camden there is a lower proportion of low-income households compared to the national average, where 33.1% of households are considered low-income. It is also lower than the 27% rate for Greater London.

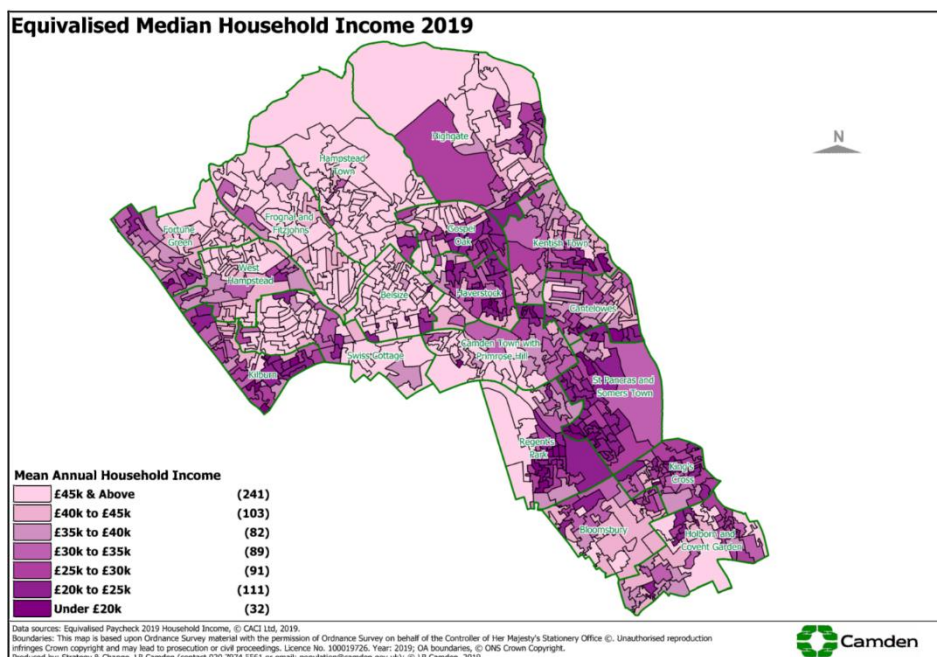
Estimates of equivalised household income for 2019¹ (latest available data from the GLA) show that median gross household income in Camden was £36,053, 17% higher than the London average (£30,700). There are wide differences across Camden wards, ranging from £24,674 in St Pancras & Somers Town to £47,748 in Hampstead Town. Median household income in Holborn and Covent Garden ward falls to the middle of the range at £35,136, ranking 11th highest for median household income and 10th for mean (£42,677) household income.

The map below shows the median household income by Output Area. There is a concentration of households with lower median household incomes in Holborn and Covent Garden ward, especially to the north and east, and to the south-west.

¹ Equivalised *Paycheck* household income data for 2019, © CACI Ltd. Equivalising reflects the notion that, for example, a household of five will need a higher income than a single person living alone to enjoy a comparable standard of living. CACI calculate an 'equivalence value' for households, based on the number and age of household members. Equivalised income is calculated by applying the equivalence value to the *Paycheck* income data.

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Equivalised Median Annual Household Income 2019, by Camden Output Area



Source: Paycheck 2019 @ CACI Ltd

Household income data matters because low household income is used as a proxy for poverty, with poverty being defined as when equivalised household income is below 60% of median household income in an area. While the CACI *Paycheck* data cannot be broken down to reveal more socio-economic details about the individual households, we know already from DWP Households Below Average Income (HBAI) local measures that poverty in Camden is above the average and that 28.5% of children live in households that are in poverty by this measure². The same data expressed by ward suggests that 29.4% of children in Holborn and Covent Garden ward live in poverty, ranking 7th highest by ward in Camden.

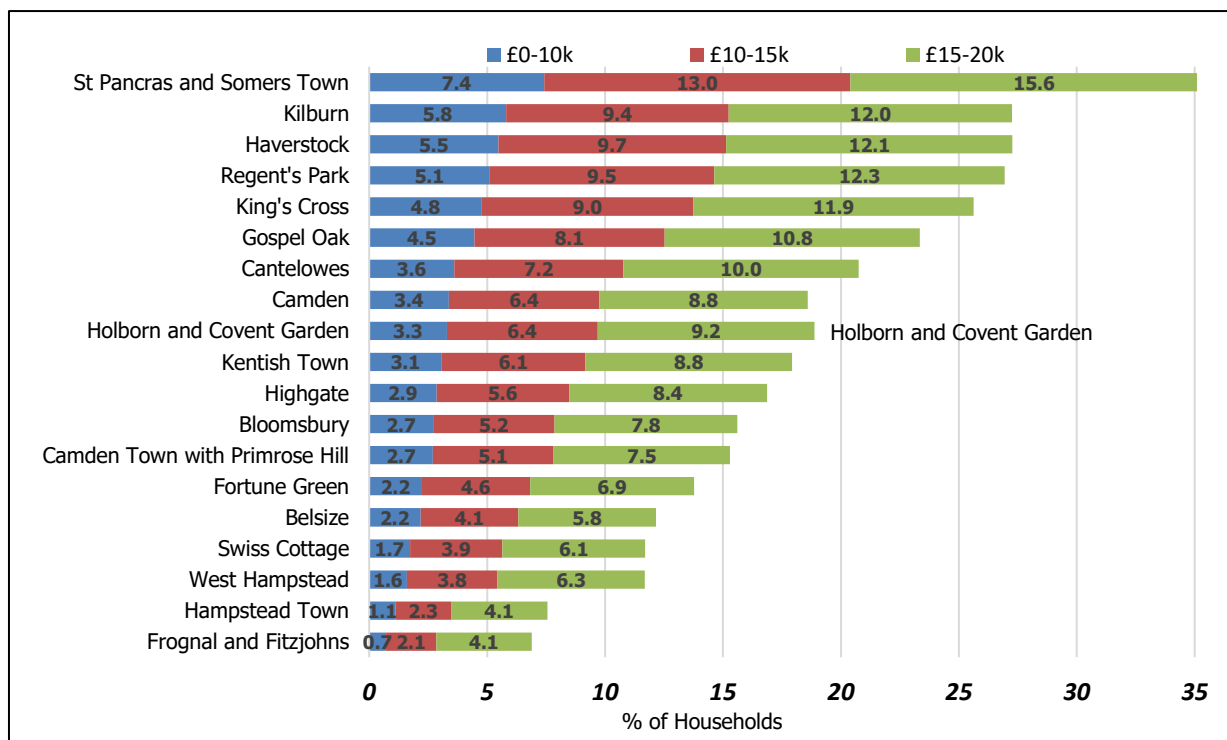
According to equivalised Paycheck 2019, using the HBAI definition, a household in poverty in Camden is one with less than £21,632. Therefore, the Paycheck 2019 household income group below £20k is the group that can positively be identified as wholly below the poverty threshold, while a minority of those with household incomes of less than £25k are likely to be households in poverty, but it cannot be said definitively³.

² Households Below Average Income local measures 2016, © HMRC, 2019.

³ CACI *PayCheck* data is published in £5k bands so it is not possible to establish the exact number of households below or above the 60% threshold.

Camden Council Equality Impact Assessment Form

% of households with Median Income less than £20,000 a year: Paycheck 2019



Deprivation

The Indices of Deprivation 2019⁴ (the latest published), allows for the identification of the areas in England with the highest proportion of people and households experiencing deprivation. The data is calculated at LSOA⁵ level and takes into consideration relative deprivation across seven factors: *income, employment, health and disability, education, skills and training, housing and services, and crime and living environment*. The indices are provided as both a score and as a rank position within England. The combined overall index is the *Index of Multiple Deprivation (IMD)* and, with the LSOA geography, is designed to show hotspots of deprivation that are often masked with ward level measures. However, a ward position can be calculated by averaging the IMD scores. On this basis Holborn and Covent Garden is ranked the 9th most deprived ward.

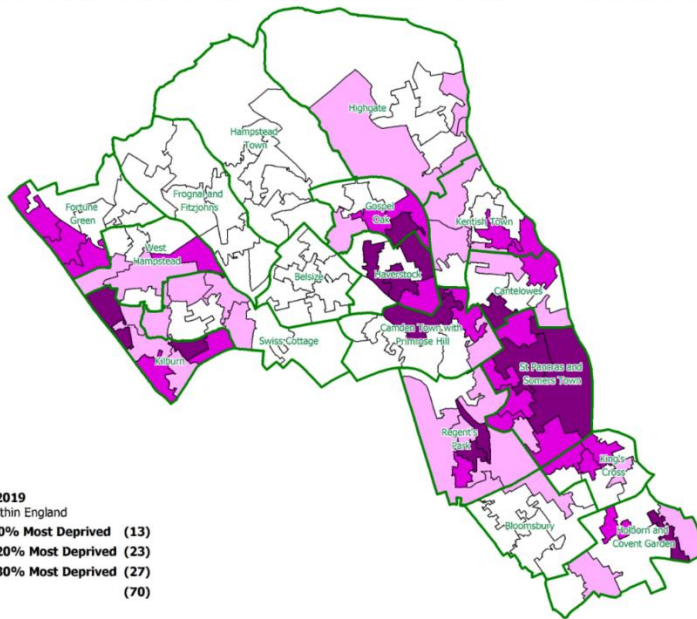
Results for Camden show that there are concentrations of LSOAs within Camden that on the rankings of IMD fall within the highest levels in England. Holborn and Covent Garden ward contains 1 LSOA that falls within the 20% most deprived LSOAs in England and none that falls within the 20-30% most deprived LSOAs in England. Holborn and Covent Garden's most deprived LSOA (E01000917) is the 13th most deprived LSOA in Camden and falls within the 18% most deprived LSOAs in England. Best viewed on a map, Fig.4 shows the LSOAs in Camden ranked within the 10%, 20% and 30% most deprived in England.

⁴ English Indices of Deprivation 2019, © MHCLG, 2019.

⁵ LSOAs are a statistical geography, smaller than wards, based on groups of 2011 Census Output Areas (OAs). There are 133 LSOAs in Camden and 32,844 in England. There are 7 LSOAs in Holborn and Covent Garden ward (E01000914-E01000920).

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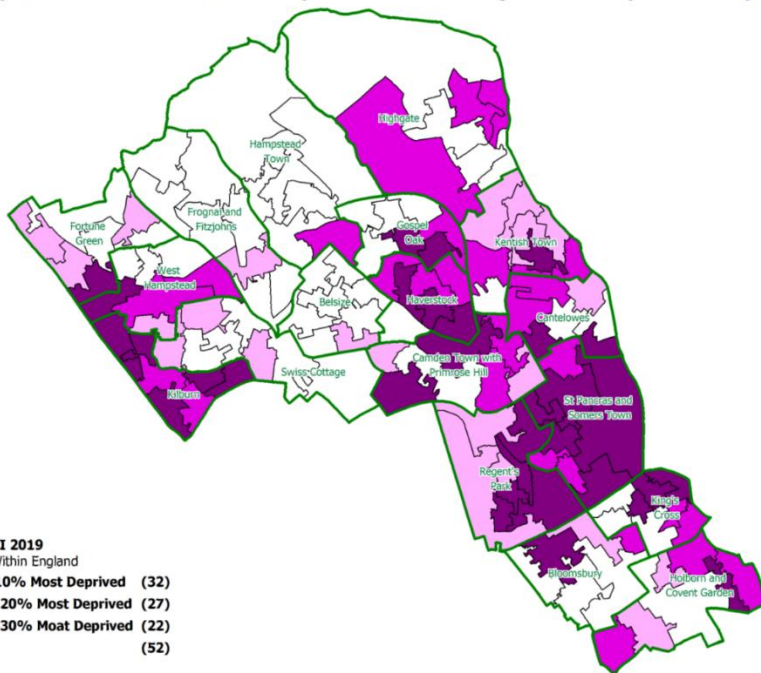
Indices of Deprivation 2019: Income Deprivation Affecting Children Index (IDACI) Rank



Data source: Indices of Deprivation 2019, © MGLG, 2019. Borough and Ward boundaries and StreetView are based upon Ordnance Survey material and are reproduced with the permission of Ordnance Survey on behalf of the Controller of HMSO ©. Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings. Licence No. 100019726. Year: 2019; LSOA Boundaries, © ONS Crown Copyright; Produced by: Strategy & Change, LB Camden. (contact 020 7974 5561 or email: population@camden.gov.uk). © LB Camden, 2019.



Indices of Deprivation 2019: Income Deprivation Affecting Older People Index (IDAOP) Rank



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Refugees and asylum seekers

Statistics for refugees and asylum seekers are available for Camden borough. The Council's monitoring shows that in the first quarter of 2023, 603 people arrived under the homes for Ukraine scheme, bringing the total cohort of people from Ukraine to 1294.

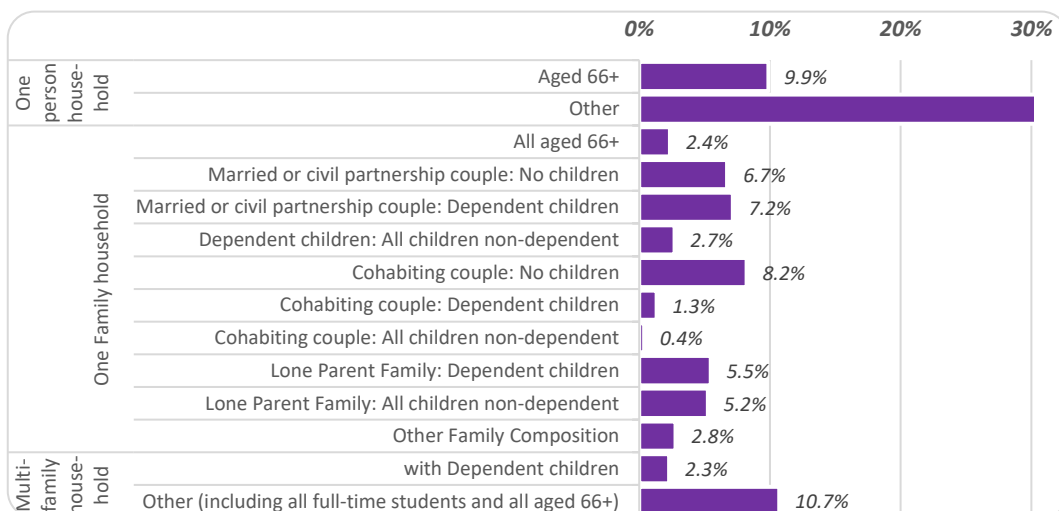
With regards to asylum seekers, at the end of July 2023 there were 630 asylum seekers living in temporary accommodation in Camden. Approx. 14% of the asylum seeker cohort are under 18 years of age and approx. 58% are between the ages of 18 and 35 years. The majority of the cohort are male, with the top three languages spoken recorded as Arabic, Kurdish and Pashto. At the end of July 2023, the size of the Afghan refugee cohort in Camden remained at 212 service users.

Camden Council Equality Impact Assessment Form

Parents (of any gender, with children aged under 18)

Household Composition

| | Area No | Area % | Camden % |
|---|---------|--------|----------|
| All households | | | |
| All households | 4,978 | 100% | 100% |
| One person households (total) | 2,224 | 44.7% | 38.7% |
| One Family households (total) | 2,107 | 42.3% | 49.3% |
| Multi-family households (total) | 647 | 13.0% | 12.0% |
| One person: Aged 66+ | 492 | 9.9% | 10.5% |
| One person: Other | 1,732 | 34.8% | 28.3% |
| One Family: All aged 66+ | 117 | 2.4% | 3.2% |
| One Family: Married/CP couple: No children | 335 | 6.7% | 7.2% |
| One Family: Married/CP couple: Dep.children | 356 | 7.2% | 11.9% |
| One Family: Married/CP couple: non-Dep.childs | 134 | 2.7% | 2.9% |
| One Family: Cohabiting couple: No children | 409 | 8.2% | 8.5% |
| One Family: Cohabiting couple: Dep.children | 66 | 1.3% | 1.9% |
| One Family: Cohabiting couple: non-Dep.childs | 19 | 0.4% | 0.3% |
| One Family: Lone Parent Family: Dep.Children | 272 | 5.5% | 6.4% |
| One Family: Lone Parent Family: non-Dep.childs | 261 | 5.2% | 5.0% |
| One Family: Other Family Composition | 138 | 2.8% | 1.8% |
| Multi-family: with Dependent children | 114 | 2.3% | 2.5% |
| Multi-family: Other (including all full-time students and all aged 66+) | 533 | 10.7% | 9.5% |



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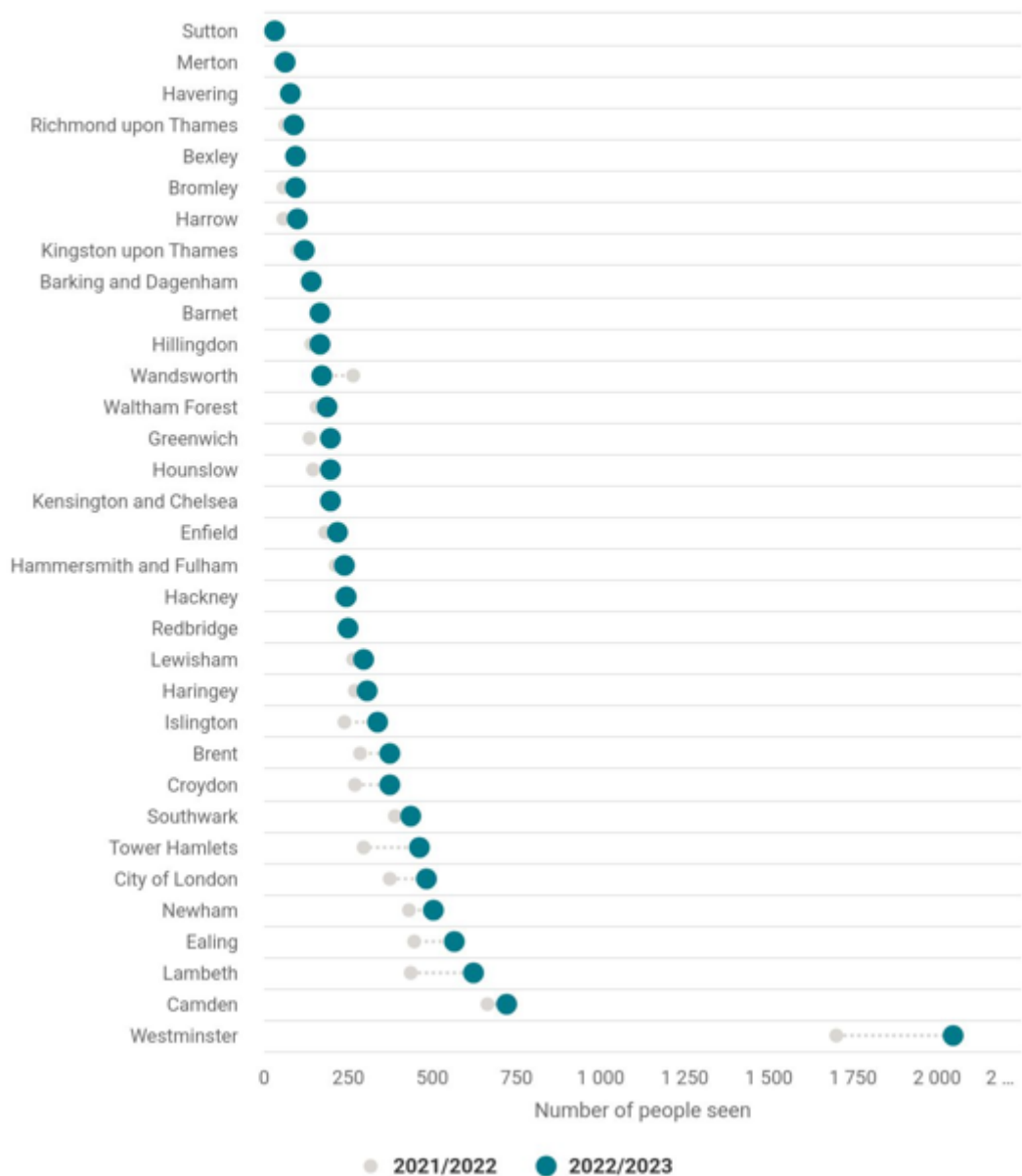
A significantly lower proportion of married couples in the area (7.2%) have dependent children compared to the borough-wide average of 11.9%. Cohabiting couples (1.3%) and lone-parent families (5.5%) in the area with dependent children closely match the Camden-wide proportions, with only minor differences.

People who are homeless

Camden Council Equality Impact Assessment Form

People seen sleeping rough by outreach workers by borough (2022/23)

Data source: CHAIN from St Mungo's via London Datastore (2022/23) and Spotlight from MHCLG (2023)



Generally, central London boroughs have more people seen sleeping rough than outer boroughs. Westminster is the borough with the most people recorded sleeping rough by far, with 2,050 people known to outreach workers there. This is nearly three times the number in Camden, the next highest borough. While exact figures are unavailable, it is clear that the Holborn and Covent Garden ward has a substantial number of individuals experiencing homelessness. This is a recurring concern raised in consultation. Since 2021/2022 almost every borough including Camden has seen an increase in people seen sleeping rough.

In 2011 Crisis reported that Homeless people rough sleeping are:

- 150 times more likely to be fatally assaulted than the general population
- 35 times more likely to kill themselves than the general population
- 8 times more likely to die in an accident than the general population

Camden Council Equality Impact Assessment Form

- times more likely to die of pneumonia or hypothermia than the general population

In addition to rough sleeping, Camden also sees other forms of homelessness, including statutory homelessness, hidden homelessness and people at risk of homelessness.

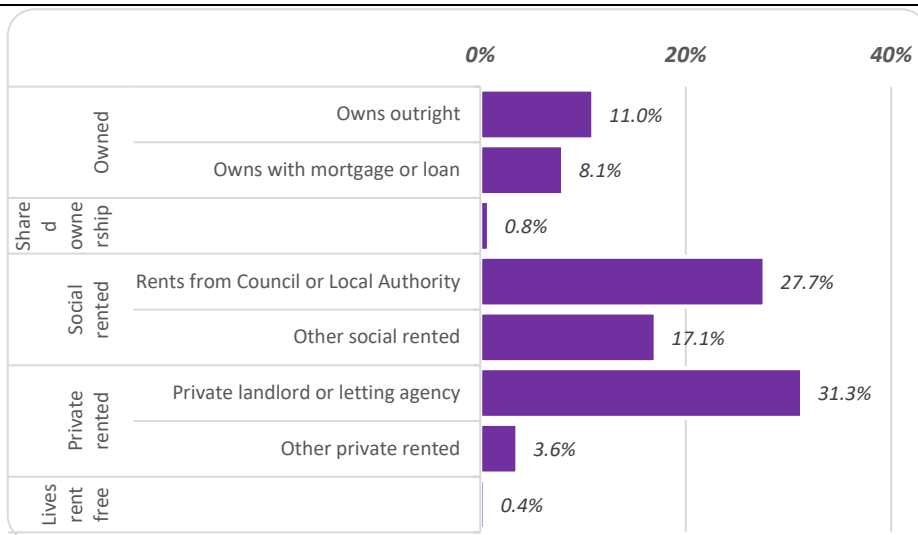
Camden provides services to all people who are homeless or at risk of homelessness, regardless of their protected characteristics. These include pregnant women, people with dependent children, older adults, young people, individuals transitioning from hospitals or prisons, those arriving from abroad at risk of homelessness, and victims of domestic abuse.

Within the Vision boundaries are Parker Street Hostel in Parker Street and The Lodge in Brook Street

Private rental tenants in deprived areas

| | Area No | Area % | Camden % |
|---------------------------------------|----------------|---------------|-----------------|
| All households | 5,000 | 100% | 100% |
| Owned | 953 | 19.1% | 29.7% |
| Owns outright | 550 | 11.0% | 15.9% |
| Owns with mortgage or loan | 403 | 8.1% | 13.7% |
| Shared ownership | 42 | 0.8% | 0.8% |
| Social rented | 2,236 | 44.7% | 33.7% |
| Rents from Council or Local Authority | 1,383 | 27.7% | 22.7% |
| Other social rented | 853 | 17.1% | 11.0% |
| Private rented | 1,747 | 34.9% | 35.6% |
| Private landlord or letting agency | 1,566 | 31.3% | 32.8% |
| Other private rented | 181 | 3.6% | 2.8% |
| Lives rent free | 22 | 0.4% | 0.3% |

Camden Council Equality Impact Assessment Form



In Camden private renters make up 35.6% of the housing market, higher than the UK but in line with other Inner London Boroughs. The proportion of private renters in Holborn is marginally less at 34.9%.

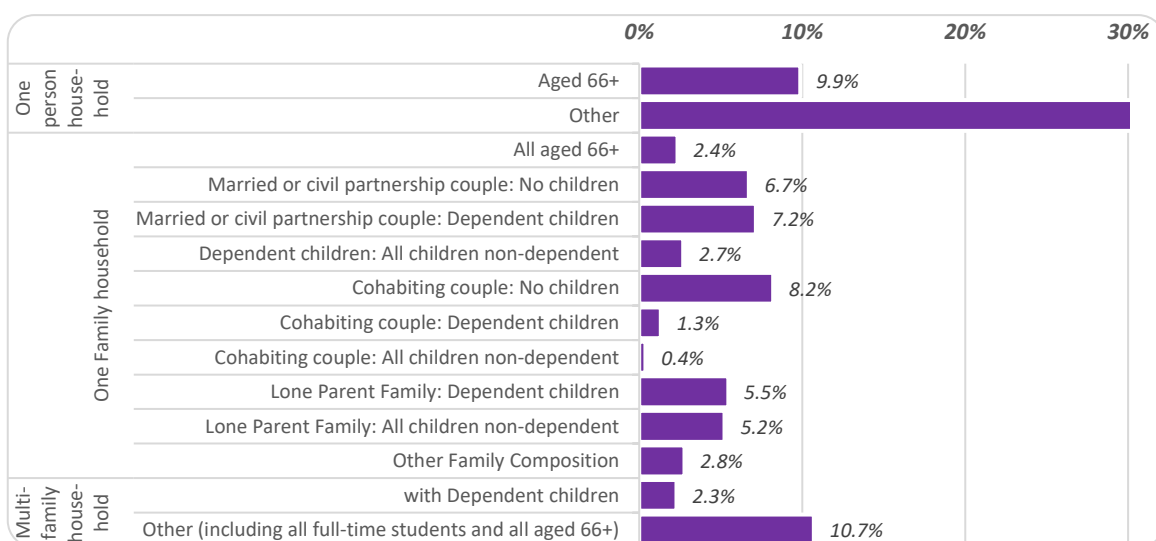
Camden is the third most expensive borough in London when comparing rental prices to London median pay (the middle pay, above which are half of earners and below which are half of the earners). The only two more expensive boroughs are Westminster and Kensington and Chelsea. Monthly rent in Camden is 55% of median pay in London.

Camden offers a comprehensive range of services and support for its renters. Private renters facing tenancy difficulties can seek assistance from Camden's Floating Support team. Additionally, Camden provides a Private Sector Housing Team, Housing Options and Advice Service, Camden Lettings Scheme, and a Private Renter Forum. For tenants seeking to make a Rent Repayment Order, Flats Justice, located within walking distance of Holborn on Great Portland Street, offers specialized support.

Camden Council Equality Impact Assessment Form

Single parent households

| | Area No | Area % | Camden % |
|---|--------------|--------------|--------------|
| All households in the Holborn Vision Area | 4,978 | 100% | 100% |
| One person households (total) | 2,224 | 44.7% | 38.7% |
| One Family households (total) | 2,107 | 42.3% | 49.3% |
| Multi-family households (total) | 647 | 13.0% | 12.0% |
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| One Family: Lone Parent Family: non-Dep.childs | 261 | 5.2% | 5.0% |
| One Family: Other Family Composition | 138 | 2.8% | 1.8% |
| Multi-family: with Dependent children | 114 | 2.3% | 2.5% |
| Multi-family: Other (including all full-time students and all aged 66+) | 533 | 10.7% | 9.5% |



Proportionately, there are fewer lone parent family households with dependent children in the Holborn (5.5%) than there are in Camden (6.4%)

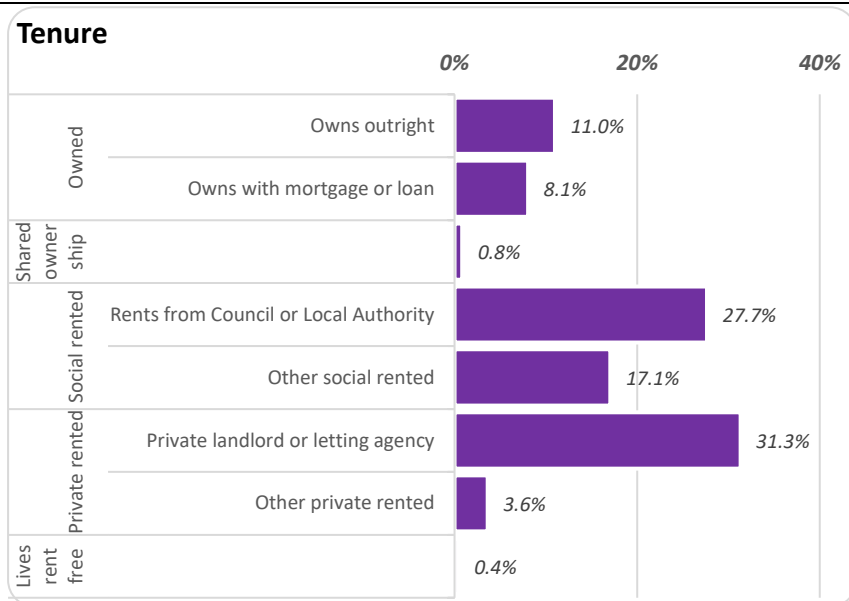
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Gingerbread Home is based in Kentish Town in Camden and offers free advice and support services for single parents in the UK. Gingerbread Home's vision is to create a world where all single parents and their children don't just survive. They Thrive.

Social housing tenants

| | Area No | Area % | Camden % |
|---------------------------------------|----------------|---------------|-----------------|
| All households | 5,000 | 100% | 100% |
| Owned | 953 | 19.1% | 29.7% |
| Owns outright | 550 | 11.0% | 15.9% |
| Owns with mortgage or loan | 403 | 8.1% | 13.7% |
| Shared ownership | 42 | 0.8% | 0.8% |
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| Other private rented | 181 | 3.6% | 2.8% |
| Lives rent free | 22 | 0.4% | 0.3% |

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Socially rented tenants comprise a significant portion of the household population in Holborn, representing 44.7% compared to the Camden-wide average of 33.7%. Of these, Camden Council is the primary social housing provider, accounting for 27.7% of socially rented households in Holborn, which is higher than the borough-wide proportion of 22.7%. Additionally, Holborn has a notably larger proportion of socially rented tenants from other social landlords (17.1%) compared to Camden (11%).

Tenant Representation and Engagement

Many social housing estates and blocks in Holborn have Tenants and Residents Associations (TRAs) or Residents Associations (RAs). These groups work collaboratively with residents with the aim to improve their living environment and advocate for their interests. TRAs engage with housing services to influence the management of their estates and blocks, ensuring that residents' voices are heard. Residents in estates without TRAs can take the initiative to establish one. Some of the TRAs in Holborn include include Gordon Mansions RA, Gamage's TRA, Tybalds Close TRA, Seymour House RA, Falcon TRA, Medway Court TRA, Dudley Court TRA, and Red Lion RA.

District Management Committees (DMCs)

Camden's five District Management Committees, including the Holborn DMC, are independent advisory groups comprising tenant representatives and councillors. These committees meet quarterly to focus on the performance of housing management and property services delivered to tenants and residents. While the DMC primarily addresses housing-related matters, certain issues may be referred by DMC chairs and council officers.

The National Housing Federation (NHF) is a UK-based charity representing housing associations and other providers of affordable housing. Headquartered at Lion Court, 25 Procter Street, London WC1V 6NY.

The NHF works to:

- Promote affordable housing:** The NHF campaigns for policies that support the development and maintenance of affordable housing.

Camden Council Equality Impact Assessment Form

- **Support housing associations:** The NHF provides advice, training, and support to housing associations, enabling them to deliver high-quality services to their tenants.
- **Represent the sector:** The NHF advocates for the interests of housing associations and their tenants, both to the government and the public.

The NHF plays a vital role aiming to ensure that everyone has access to a safe and affordable home.

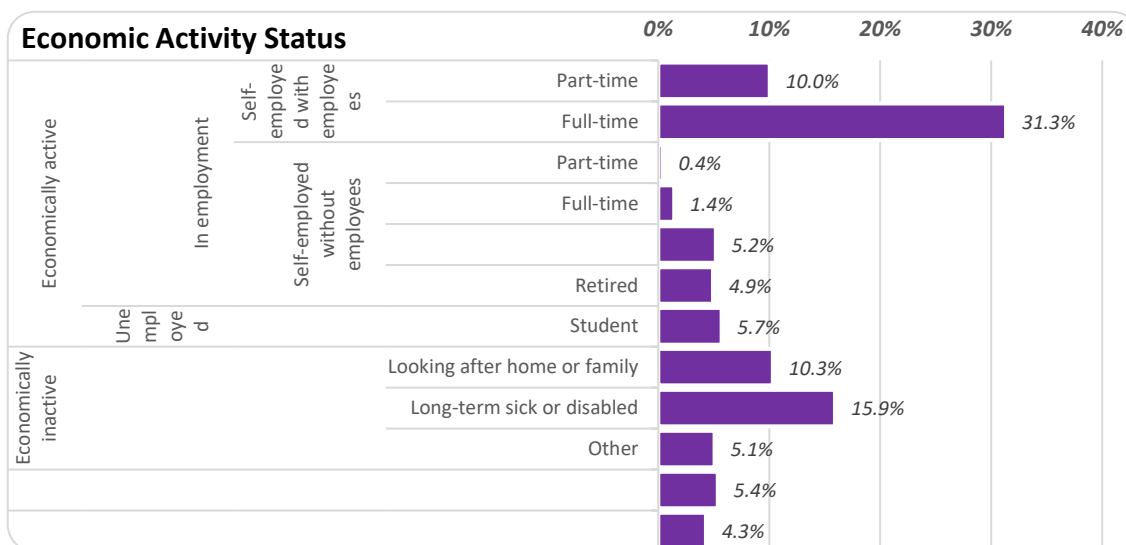
Any other, please specify

Economic Activity

| | | Area % | Camden % |
|--|--------------|-------------------|---------------------|
| All usual residents aged 16+ | 9,271 | | |
| Overall 16+ Economic Activity rate (%) | | 59.0% | 62.7% |
| Overall 16+ Unemployment rate (5) | | 9.7% | 8.1% |
| Economically active (exc. full-time students) | 5,084 | 54.8% | 59.3% |
| In employment | 4,673 | 50.4% | 55.3% |
| Employee | 3,628 | 39.1% | 42.7% |
| Part-time | 762 | 8.2% | 7.7% |
| Full-time | 2,866 | 30.9% | 35.0% |
| Self-employed with employees | 165 | 1.8% | 2.0% |
| Part-time | 34 | 0.4% | 0.5% |
| Full-time | 131 | 1.4% | 1.5% |
| Self-employed without employees | 880 | 9.5% | 10.6% |
| Part-time | 431 | 4.6% | 5.2% |
| Full-time | 449 | 4.8% | 5.4% |
| Unemployed | 411 | 4.4% | 4.0% |
| | | | |
| Economically active and a full-time student | 386 | 4.2% | 3.4% |
| In employment | 269 | 2.9% | 2.3% |
| Employee | 208 | 2.2% | 1.8% |
| Part-time | 169 | 1.8% | 1.4% |
| Full-time | 39 | 0.4% | 0.4% |
| Self-employed with employees | 4 | 0.0% | 0.0% |
| Part-time | 3 | 0.0% | 0.0% |
| Full-time | 1 | 0.0% | 0.0% |
| Self-employed without employees | 57 | 0.6% | 0.4% |
| Part-time | 49 | 0.5% | 0.4% |

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|------------------------------|--------------|--------------|--------------|
| Full-time | 8 | 0.1% | 0.1% |
| Unemployed | 117 | 1.3% | 1.1% |
| Economically inactive | 3,801 | 41.0% | 37.3% |
| Retired | 957 | 10.3% | 10.8% |
| Student | 1,477 | 15.9% | 12.4% |
| Looking after home or family | 471 | 5.1% | 5.4% |
| Long-term sick or disabled | 498 | 5.4% | 4.6% |
| Other | 398 | 4.3% | 4.2% |

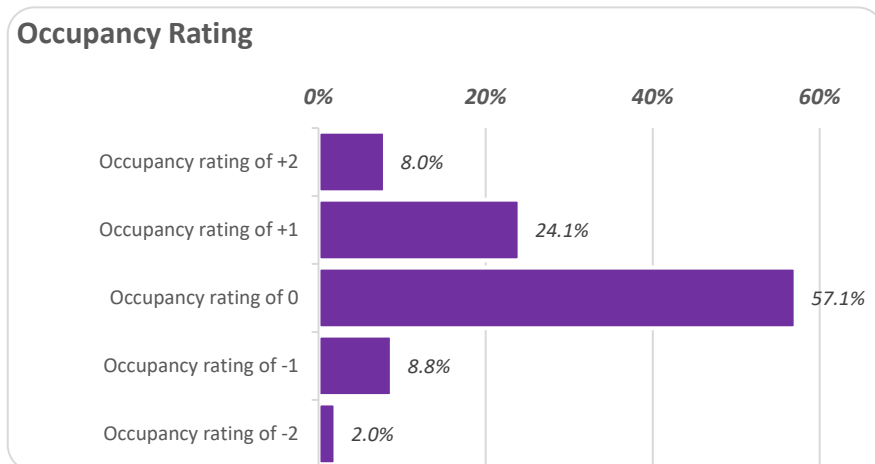


- Economic activity: 59.0% of individuals in Holborn aged 16+ are economically active, excluding full-time students. This is marginally lower than the borough-wide proportion of 62.7%.
- Unemployment: The overall unemployment rate for individuals aged 16+ in Holborn is 9.7%. This is notably higher than the borough wide proportion of 8.1%.
- Employment: 4,673 individuals are employed in Holborn, representing 50.4% of the economically active population. This is notably lower than the borough-wide proportion of 55.3%.
- Employee status: The majority of employed individuals in Holborn (3,628) are employees, with 39.1% working part-time and 30.9% working full-time, which are broadly similar to the borough-wide proportions
- Self-employment: 1,045 individuals are self-employed, with 165 having employees and 880 working without employees. This is broadly in line with the borough-wide proportions
- Economic inactivity: 3,801 individuals are economically inactive, primarily due to retirement (957), student status (1,477), and long-term sickness or disability (498). This is marginally higher than the borough wide proportion of 37.3%.

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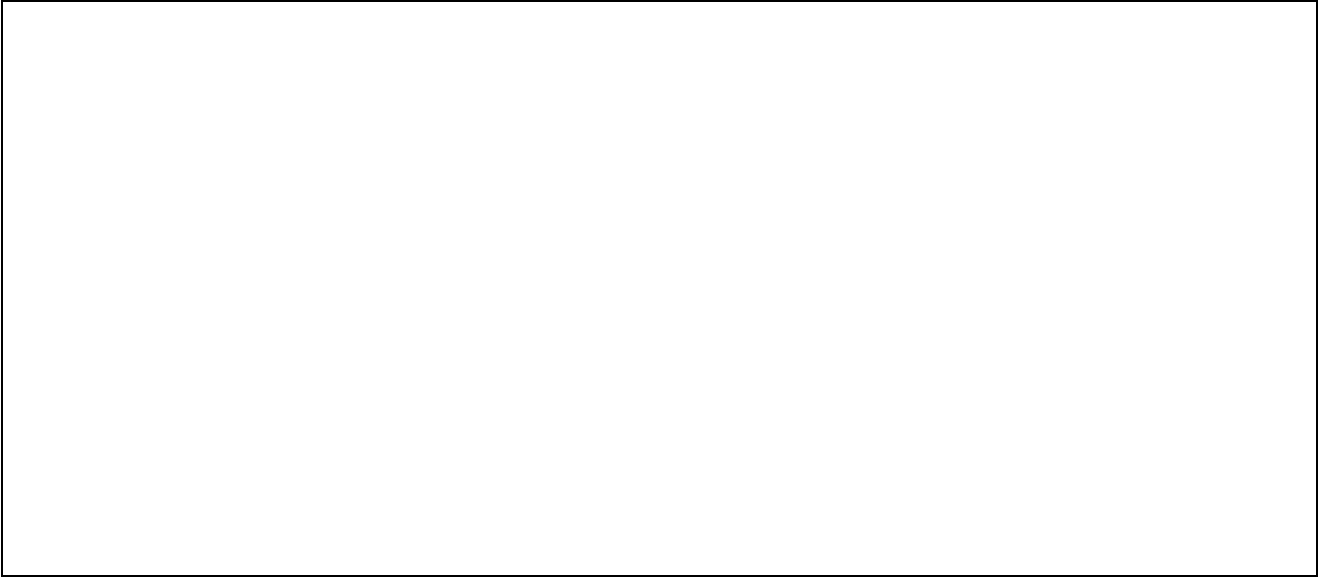
Occupancy Rating

| | 4,988 | Area No | Area % |
|-------------------------|--------------|----------------|---------------|
| Total Households | 4,988 | 100% | 100% |
| Occupancy rating of +2 | 397 | 8.0% | 14.4% |
| Occupancy rating of +1 | 1,201 | 24.1% | 26.5% |
| Occupancy rating of 0 | 2,849 | 57.1% | 49.6% |
| Occupancy rating of -1 | 439 | 8.8% | 7.7% |
| Occupancy rating of -2 | 102 | 2.0% | 1.8% |



- A significant portion (57.1%) of households have an occupancy rating of 0, indicating they have the ideal number of occupants. This is significantly larger than the borough-wide proportion of 49.6%
- 24.1% of households have an occupancy rating of +1, suggesting they have one more occupant than is ideal. This is marginally lower than the borough-wide proportion of 26.5%.
- 8.0% of households have an occupancy rating of +2, indicating they have two more occupants than is ideal. This is significantly lower than the borough-wide proportion of 14.4%.
- 8.8% of households have an occupancy rating of -1, suggesting they have one fewer occupant than is ideal. This is marginally higher than the borough wide proportion of 7.7%.
- 2.0% of households have an occupancy rating of -2, indicating they have two fewer occupants than is ideal. This is similar to the borough wide proportion of 1.8%.

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2.c Have you found any data or evidence about intersectionality. This could be statistically significant data on disproportionality or evidence of disadvantage or discrimination for people who have a combination, or intersection, of two or more characteristics.

The Census 2021 data for the Holborn geographical area lacks the necessary detail to conduct a comprehensive intersectional analysis.

Intersectionality recognises that individuals can experience multiple forms of discrimination simultaneously, based on their protected characteristics. While it is possible to speculate about the intersectionality of protected characteristics in Holborn, relying solely on assumptions can be misleading.

People within a protected characteristic group exhibit diverse experiences and identities, and generalisations can overlook individual differences. Additionally, the interplay of different protected characteristics can vary significantly across individuals and over time.

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Step 3: Impact

Given the evidence listed in step 2, consider and describe what potential **positive and negative impacts** this work could have on people, related to their **protected characteristics** and the **other characteristics** about which the Council is interested.

Make sure you think about all three aims of the public sector equality duty. Have you identified any actual or potential discrimination against one or more groups? How could you have a positive impact on advancing equality of opportunity for a particular group? Are there opportunities within the activity to promote “good relations” – a better understanding or relationship between people who share a protected characteristic and others?

The role of the Holborn Vision is to improve places and spaces in the Holborn area by guiding development and investment to enhance the experience of living, working, visiting and moving around Holborn.

It is the intention for the SPD to support Camden’s Development Plan and will be a material consideration when determining planning applications. The document in itself does not deliver development but guides development that comes forward. The SPD cannot make policy and must align with the policies set out in the adopted Camden Local Plan (2017) which was subject to an EqIA.

Below is a summary of the potential negative and positive impacts that the Holborn Vision (SPD) could have on protected characteristics.

3.a Potential negative impact on protected characteristics

| Protected Characteristic | Is there potential negative impact? (Yes or No) | Explain the potential negative impact |
|--------------------------|---|---|
| Age | Yes | <p>Some of the potential negative impacts outlined in all of the protected characteristics and other characteristics could impact individuals based on their age.</p> <p>The Holborn Vision promotes improved accessibility across the area and contributes to the health and well being of its users, including through improved public transportation and sustainable travel modes to encourage active travel and commuting and support the HNL. However, consultation feedback, particularly from residents with mobility challenges, including elderly individuals, expressed concerns about the potential limited access to private vehicles such as black cabs, the moving bus stops and the impact of diverted traffic. These residents, perceive private vehicles as essential to meet their mobility needs, viewing them as comparable to public transportation options.</p> <p>Residents of all ages prioritised their safety when walking in the area and feedback from consultation expressed strong concerns about potential conflict with</p> |

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| | | <p>pedestrians interacting with cyclists who can travel carelessly and at high speeds.</p> <p>An objective in the Holborn Vision is to design safe public realm that encourages people to sit and socialise throughout the day and night. This is perceived by some residents of all ages, backgrounds, circumstances and characteristics as providing opportunities that has the potential to encourage anti-social behaviour including noise pollution, especially at night, and who do not anticipate themselves using these spaces.</p> <p>The Holborn Vision provides guidance on development in the area which can require construction. This construction could generate temporary noise, dust and traffic congestion, potentially disrupting the daily routines and well-being of residents of all ages, backgrounds, circumstances and characteristics. Difficulty relaxing at home and enjoying the neighbourhood could also arise during this period.</p> <p>The Holborn Vision guides development and highlights ideas for the HLN projects. Further consultation on these will involve the community in shaping projects and will be subject to consultation, equalities and decision-making processes.</p> |
| Disability including carers | Yes | <p>Some of the potential negative impacts outlined in all of the protected characteristics and other characteristics could impact individuals with disabilities, including carers.</p> <p>The Holborn Vision promotes public transportation and sustainable travel modes to encourage active travel/commuting and support the HLN. However, consultation feedback, particularly from residents with mobility challenges, expressed concerns about the potential limited access to private vehicles such as black cabs. These residents view private vehicles as essential for their mobility needs, viewing them on par with public transportation options.</p> <p>Residents with disabilities may have strong concerns about potential issues with getting about in the area and interacting with cyclists who are reported to travel carelessly and at high speeds.</p> <p>Residents with disabilities and their caregivers may be affected by the potential noise, dust, and traffic congestion associated with any new construction in Holborn, as they could be more likely to be present in</p> |

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| | | <p>the area throughout the day. Although some construction could commence without the SPD in place and without objectives on safety and security which are included in it.</p> |
| Gender reassignment | Yes | <p>Some of the potential negative impacts outlined in all of the protected characteristics and other characteristics could impact individuals with the protected characteristic of gender reassignment including non-binary individuals and gender non-conforming individuals.</p> <p>The Holborn Vision aims to enhance Holborn's established residential community through the provision of a wide range of new homes, including affordable homes and the services that sustain them. In addition, the Holborn Vision supports a mixed-use neighbourhood that brings together workers, residents and visitors. People with the protected characteristic of gender reassignment, including non-binary individuals and gender non-conforming individuals could worry about facing prejudice and feel fearful in the public realm, which could potentially lead to feelings of isolation.</p> <p>Regeneration projects can have unintended consequences, such as increasing housing costs and affecting low-income individuals. As reported by the Living Wage Foundation in February 2022, transgender individuals are particularly vulnerable to low wages and may face additional challenges due to economic disparities.</p> |
| Marriage/civil partnership | Yes | <p>Some of the potential negative impacts outlined in all of the protected characteristics and other characteristics could impact individuals who are married or are in a civil partnership.</p> <p>The Holborn Vision provides guidance on development in the area which can require construction. This construction could generate temporary noise, dust and traffic congestion, potentially disrupting the daily routines for people who are in a partnership, making it difficult to relax at home or enjoy the area.</p> |

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| Protected Characteristic | Is there potential negative impact? (Yes or No) | Explain the potential negative impact |
|--------------------------|---|--|
| Pregnancy/ maternity | Yes | <p>Some of the potential negative impacts outlined in all of the protected characteristics and other characteristics could impact pregnant or maternity individuals.</p> <p>The Holborn Vision provides guidance on development in the area which can require construction. This construction could generate temporary noise, dust and traffic congestion, potentially disrupting the daily routines. This could be particularly challenging for pregnant women who need rest both indoors and outdoors, as well as for young children who can thrive on regular and predictable schedules.</p> |
| Race | Yes | <p>Some of the potential negative impacts outlined in all of the protected characteristics and other characteristics could impact minority ethnic individuals.</p> <p>Holborn already faces some of the highest housing and business costs in London. While the Holborn Vision aims to benefit everyone who lives, works, and visits the area, its guidance for development and investment could potentially lead to increased costs. This could impact lower-income residents, who, according to the Trust for London, are more likely to belong to minority ethnic groups.</p> <p>Additionally, increased business costs could pose a significant challenge for small businesses. While demographic data on Holborn businesses is limited, some of the community-based small businesses in the area are operated by minority ethnic communities. These businesses could be particularly vulnerable to increased costs.</p> |
| Religion or belief | Yes | <p>Some of the potential negative impacts outlined in all of the protected characteristics and other characteristics could affect individuals based on their religion or belief.</p> <p>The Holborn Vision supports providing improvements to Holborn which could potentially lead to an increase in costs e.g. rent, posing a significant challenge to religious communities. If residents including their children over time are unable to continue living in the area due to increased expenses, then this could disrupt their social networks and religious or belief practices.</p> |

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| Sex | Yes | <p>Some of the potential negative impacts outlined in all of the protected characteristics could affect individuals based on their sex.</p> <p>While the Holborn Vision encourages the creation of new jobs, these may not always offer adequate or equal wages or benefits. On average female employees are paid less per hour than male employees (14% less in 2023 in London), according to GLA intelligence.</p> |
| Sexual orientation | Yes | <p>Some of the potential negative impacts outlined in all of the protected characteristics and other characteristics could affect individuals based on their sexual orientation.</p> <p>The Holborn Vision encourages investment in the area, which could potentially lead to rising costs. This could disproportionately impact LGBTQ+ individuals who may be more vulnerable to economic hardship due to factors such as discrimination. Additionally, increased development and investment could disrupt existing social networks within the LGBTQ+ community.</p> <p>Regeneration projects can sometimes lead to the loss of LGBTQ+ specific businesses.</p> <p>LGBTQ+ individuals could worry about feeling prejudice and feel fearful in the public realm.</p> |

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3.b Potential positive impact on protected characteristics

| Protected Characteristic | Is there potential positive impact? (Yes or No) | Explain the potential positive impact |
|--------------------------|---|---|
| Age | Yes | <p>The Holborn Vision will guide future planning applications within the area and aims to enhance the quality of life for all residents, workers and visitors.</p> <p>Some of the potential positive impacts outlined in all of the protected characteristics and other characteristics could benefit individuals by their age.</p> <p>The Holborn Vision aims to enhance the existing residential communities through the provision of a diverse range of new homes, including affordable homes and supportive services. New housing developments would align with Camden's existing policies, prioritising accessibility, adaptability, and self-containment. In line with the policies set out in the adopted Local Plan, homes would be designed to accommodate wheelchair users and be easily adaptable to future needs, making them particularly beneficial for older residents who wish to age in place and maintain their independence.</p> <p>Houses of Multiple Occupation (HMOs) are protected by policy and consist of residential units with shared facilities, such as kitchens and bathrooms. HMOs often offer more affordable rental options than self-contained dwellings, making them a valuable source of accommodation for young people.</p> <p>The Holborn Vision aims to support local residents by providing increased access to jobs, training, affordable workspace, and entrepreneurial opportunities. These objectives could be particularly beneficial for young people aged 16 to 24, who, according to the Institute of Employment Studies, are more than twice as likely to be unemployed compared to other age groups. This demographic may also continue to face economic difficulties and the lingering effects of disruptions to their education due to COVID-19.</p> <p>By promoting job creation, training programmes, affordable workspace, and entrepreneurial opportunities, the Holborn Vision can also potentially benefit long-term unemployed individuals and older adults, who may experience disproportionate</p> |

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| | | <p>employment discrimination compared to other age groups.</p> <p>In line with policies set out in the Local Plan, the Holborn Vision supports the enhancement of climate resilience in homes, which can improve energy efficiency and reduce energy bills. This could be particularly beneficial for older residents, who may be more vulnerable to adverse weather conditions and rising living costs. A climate resilient Holborn will improve quality of life for everyone living, working and visiting the area, through better health, well-being, and social connection.</p> <p>The Holborn Vision promotes a genuinely mixed-use neighbourhood, integrating residential, commercial, and cultural spaces to benefit residents, workers, and visitors of all ages. Older residents could particularly benefit from the close proximity of amenities in a mixed-use neighbourhood, reducing their reliance on transportation and others for support. Both older and younger residents can benefit from the increased social interaction and community engagement fostered by mixed-use environments. This could help reduce feelings of isolation and contribute to a higher quality of life for all residents.</p> <p>The Holborn Vision includes guidance to support development that meets the needs of families and residents of all ages, encouraging them to remain in Holborn.</p> <p>The Holborn Vision promotes increased pedestrian traffic, which can effectively deter crime and create a safer environment. This initiative could significantly benefit people of all ages. For older adults, a safer neighbourhood can contribute to improved overall health and well-being. Young people, who may feel more directly impacted by crime, can also benefit from an environment where they feel safer, leading to enhanced health and well-being.</p> <p>The Holborn Vision includes an objective to make a public realm that encourages people of all ages to walk and cycle, sit, and socialise, including opportunities for play throughout the year. The Vision supports the creation of more high-quality and accessible, public realm including public open spaces and green areas. These improvements can offer significant benefits for everyone. For children, they provide safe and stimulating environments for play, socialisation, and development, encouraging physical activity and</p> |
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| | | <p>educational opportunities. For adults, including individuals working in the area, public spaces can improve mental health and well-being by providing access to green areas. These spaces can reduce stress, enhance mood, and contribute to overall mental health. Older adults could benefit from increased opportunities for walking, cycling, and other forms of exercise in these public spaces. Everyone can also engage socially with their communities in these spaces and reduce feelings of isolation.</p> <p>The Holborn Vision facilitates the HLN to bring about attractive, healthy and safer neighbourhoods through the prioritisation of public transport and sustainable transport modes. This approach aims to promote, improve and create more opportunities for active travel including creating more attractive, healthier and safer neighbourhoods, which would benefit people of all ages.</p> <p>The Holborn Vision celebrates the area's unique character and aims to ensure that future development complements and enhances its distinct qualities. The Vision has an objective that ensures that public realm design responds to the diverse and often hidden history of the area and by doing so, encourage greater equity in the use of Holborn's streets, places and spaces. By preserving Holborn's historic fabric and making public spaces more accessible, the Holborn Vision can help to create a healthier, more vibrant community for everyone, including residents, workers, and visitors of all ages. This can strengthen Holborn's sense of place and foster a greater sense of belonging.</p> |
| <p>Disability including carers</p> | <p>Yes</p> | <p>Some of the potential positive impacts outlined in all of the protected characteristics and other characteristics could benefit individuals with disabilities, including their caregivers.</p> <p>Individuals with disabilities often require more accessible infrastructure to move around their surroundings more easily. The Holborn Vision supports improvements in accessibility and wayfinding throughout the area, which can significantly benefit people with disabilities and their caregivers.</p> <p>The Holborn Vision facilitates the HLN, which prioritises sustainable transportation modes. These include wheelchair-accessible, cycle-friendly, and pedestrian-friendly options. According to TfL, 78% of people with disabilities are able to cycle. This highlights the need for inclusive cycling infrastructure that</p> |

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| | | <p>accommodates a variety of non-standard cycles, such as tricycles, tandems, and hand cycles.</p> <p>Disabilities can encompass a wide range of conditions, including mobility impairments, mental health conditions, learning disabilities, and neurodevelopment conditions. The Holborn Vision promotes a more inclusive and accessible environment for all individuals. Enhancing routes and wayfinding can benefit everyone, but it is particularly crucial for individuals with neurodivergence who can often experience increased stress and anxiety when navigating unfamiliar areas.</p> <p>People with disabilities often experience isolation, which can be due to physical barriers, attitudinal barriers, lack of support services and financial constraints. The Holborn Vision can help to play a crucial role in reducing isolation for people with disabilities. Improving the public realm and providing more access to public spaces will make it easier for people with disabilities to navigate their communities and participate in daily activities, engage in social activities and connect with others.</p> <p>The Holborn Vision promotes job creation, entrepreneurship, and training opportunities. Individuals with disabilities often encounter higher unemployment rates and face discriminatory barriers in the job market. By potentially expanding access to employment and training programs, the Holborn Vision aims to create more inclusive and equitable opportunities, which could especially benefit people with disabilities. By locating these resources within the area people with disabilities will be able to have access to jobs and training opportunities closer to where they live.</p> |
| Gender reassignment | Yes | <p>Some of the potential positive impacts outlined in all of the protected characteristics and other characteristics could benefit individuals with the protected characteristic of gender reassignment, including non-binary individuals, and gender non-conforming individuals.</p> <p>The Holborn Vision's objectives can contribute to a more inclusive and supportive environment for people with the protected characteristic of gender reassignment, including non-binary individuals and gender non-conforming individuals, helping to address</p> |

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| | | <p>the daily challenges and discrimination they can often face.</p> <p>By promoting the creation of inclusive and safe spaces, the Holborn Vision supports improvements to public areas, transportation (via the HNL), and housing. These objectives are particularly important for individuals with the protected characteristic of gender reassignment, including non-binary individuals and gender non-conforming individuals who often face discrimination and challenges in these areas. Improving the housing opportunities including the provision of more affordable homes, in line with the policies in the adopted Local Plan, can potentially benefit individuals with the protected characteristic of gender reassignment and gender non-conforming individuals who may be disproportionately affected by discrimination and economic hardship.</p> <p>Through job creation, entrepreneurship support, and training, the Holborn Vision could help to empower people with the protected characteristic of gender reassignment, including non-binary individuals and gender non-conforming individuals to participate fully in the workforce. These individuals frequently encounter higher unemployment rates and discriminatory barriers in the job market. The Holborn vision supports the provision of more affordable homes.</p> <p>By strengthening and enhancing existing local communities, the Holborn Vision seeks to foster a sense of belonging and reduce social isolation which could be especially beneficial for individuals with the protected characteristic of gender reassignment, including non-binary individuals and gender non-conforming individuals. This can help to create a more welcoming and inclusive environment where these individuals feel safer, more comfortable and part of the local community.</p> |
| Marriage/civil partnership | Yes | <p>Some of the potential positive impacts outlined in all of the protected characteristics and other characteristics could benefit individuals who are married or are in a civil partnership.</p> <p>The Holborn Vision promotes a safer and more accessible neighbourhood, with improved infrastructure, public spaces, parks, and transportation options. These enhancements can create a more welcoming environment for everyone, including married and partnered individuals. By fostering a greater sense of belonging and inclusion, these improvements can positively impact the well-being of couples and</p> |

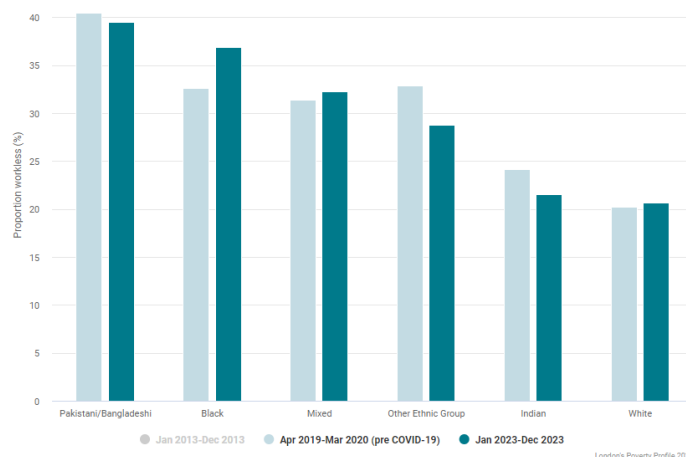
Camden Council Equality Impact Assessment Form

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| | | <p>encourage their participation in community activities.</p> <p>The Holborn Vision's objectives can help to foster a stronger sense of community, helping individuals in married or civil partnerships to feel more connected to their neighbours including neighbours who are also married or in civil partnerships, and help to reduce social isolation. This can also lead to the development of valuable support networks. The vision highlights the need to strengthen social infrastructure that supports the residential communities and families by using existing assets to bring people together.</p> <p>By promoting job creation and entrepreneurial opportunities, the Holborn Vision can help to provide individuals in married or civil partnerships with more options to improve their financial stability and achieve their goals. Additionally, supporting these areas could potentially enhance the evening and nighttime economy, offering individuals in married or civil partnerships with a wider range of activities and opportunities to enjoy in the evenings.</p> <p>The potential provision of more affordable housing can offer individuals in married or civil partnerships with a wider variety of choices for finding suitable and affordable homes within the area.</p> |
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| Protected Characteristic | Is there potential positive impact? (Yes or No) | Explain the potential positive impact |
|--------------------------|---|--|
| Pregnancy/ maternity | Yes | <p>Some of the potential positive impacts outlined in all protected characteristics and other characteristics could benefit pregnant or maternity individuals.</p> <p>The Holborn Vision supports improved infrastructure that can lead to a safer and more accessible neighbourhood with improved public spaces, crossings, and transportation options (through the HLN). This can make it easier for pregnant women to get around, reduce isolation, and minimise the risk of accidents. It can also help to facilitate opportunities for pregnant women and new mothers to develop valuable support networks within the local community.</p> <p>The Holborn Vision advocates for increased provision of much-needed housing, including affordable options. This can help to ensure pregnant women and new mothers have access to safe, comfortable, and affordable living environments within the neighbourhood.</p> <p>The Holborn Vision supports the creation of job and entrepreneurial opportunities which could especially benefit pregnant women and women with young children, enabling them to continue working or return to work. These opportunities can include flexible work arrangements.</p> |
| Race | Yes | <p>Some of the potential positive impacts outlined in all protected characteristics and other characteristics could benefit individuals from minority ethnic backgrounds.</p> <p>The Holborn Vision supports the creation of jobs, entrepreneurial opportunities and access to training. People from Black, Asian and Minority Ethnic backgrounds have a higher unemployment rate than people from a White background and the rate varies considerably by ethnic group.</p> <p>Proportions of London's working-age population who are not in paid work by ethnic group (2013 Q4, 2020 Q1 2023 Q4. Source: Trust for London</p> |

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As shown in the above table 39.5% of working-age Londoners with Pakistani/Bangladeshi backgrounds are not working – more than any other group. Black Londoners have the second highest proportion (36.9%). White Londoners have the lowest rate of being out of work (20.7%), followed by people of Indian backgrounds (21.5%). The Holborn Vision sets the objective to build on Holborn’s success as a place for entrepreneurship where start-ups and SME’s can thrive providing local people access to jobs and training.

The Holborn Vision supports strengthening and enhancing existing residential communities, including creating a safer and accessible neighbourhood with improved and more affordable housing options, transportation (via the HLN), and improved public spaces. This can improve the health and well-being of people from all backgrounds including minority ethnic backgrounds. In addition the Holborn Vision supports projects that can preserve and celebrate the cultural heritage of existing communities including minority ethnic communities, helping to maintain their cultural identity and sense of belonging in the community.

The Holborn Vision supports (via the HLN) having an inclusive and safer cycling infrastructure in place which can encourage more people to use this method of transportation including local Black, Asian and Minority Ethnic groups, as well as women, older people and individuals with disabilities all of whom are typically under-represented in cycling.

The objectives outlined in the Holborn Vision can potentially empower minority ethnic communities by proactively engaging individuals from all backgrounds in consultations and decision-making processes. Historically, minority ethnic groups have been under-represented, in regeneration and planning

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| | | <p>consultations. Consequently, more effort is necessary, to reach out to these underrepresented communities and ensure their voices are heard.</p> <p>Recent months have seen a rise in protests and demonstrations in the UK targeting individuals based on their race. The Holborn Vision aims to create a mixed-use neighbourhood that fosters a sense of community and belonging among workers, residents, and visitors, while also strengthening existing communities. These objectives could potentially contribute to a safer and more inclusive environment for everyone, allowing individuals of all races to feel safe in the area.</p> |
| Religion or belief | Yes | <p>Some of the potential positive impacts outlined in all protected characteristics and other characteristics could benefit individuals who belong to a religion or have a belief.</p> <p>The Holborn Vision supports celebrating and enriching the distinct character areas of Holborn. This includes preserving culturally significant sites, buildings or landmarks that are important to religious or believe communities, which can help to foster a sense of belonging and connection.</p> <p>In recent months there have been a rise in protests and demonstrations in the UK targeting individuals with visibly identifiable religions and beliefs, particularly individuals of Muslim and Jewish faiths. The Holborn Vision supports a mixed-use neighbourhood that brings together workers, residents and visitors, and that strengthens and enhances existing communities. This would foster a sense of community and belonging among workers, residents, and visitors. These objectives could potentially contribute to a safer and more inclusive environment for everyone, allowing individuals to openly display, practice and celebrate their religions and beliefs without fear.</p> <p>Holborn, a pivotal hub in Central London, has long been a gathering place for peaceful demonstrations. People from across London and beyond converge in Holborn to express their concerns on pressing issues and advocate for change. By supporting the enhancement of the public realm, the Holborn Vision can help to ensure that Holborn remains a vital space for democratic expression, accommodating large-scale demonstrations while maintaining safety and accessibility for all.</p> |

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| | | <p>The Holborn Vision supports job creation, entrepreneurship, and training opportunities. These objectives can potentially help maintain the cohesion of religious and belief communities within the neighbourhood and ensure that their descendants can remain connected to the area for future generations.</p> |
| Sex | Yes | <p>Some of the potential positive impacts outlined in all protected characteristics and other characteristics could benefit individuals based on their sex.</p> <p>The Holborn Vision has the potential to benefit communities by addressing both sex-specific and gender-specific needs and challenges, creating more equitable and inclusive spaces for everyone.</p> <p>By supporting mixed-use development and improved infrastructure, the Holborn Vision can enhance safety and accessibility for all residents, workers, and visitors, regardless of their biological sex, gender, or gender identity.</p> <p>The Holborn Vision supports the creation of a safer and more accessible neighbourhood through improved public spaces, crossings, transportation, activating ground floor levels of buildings etc. Incorporating features like improved lighting where needed, safe public spaces, and accessible transportation can significantly enhance safety for individuals of all sexes, genders, and gender identities, reducing the fear of crime and anti-social behaviour. This can be especially beneficial for women who may feel more vulnerable.</p> <p>The Holborn Vision's mixed uses and inclusive objectives support infrastructure that would consider the needs of individuals of all sexes, genders, and gender identities.</p> <p>The Holborn Vision supports local entrepreneurship, jobs, and training opportunities that cater to the needs of all individuals including opportunities that would specifically cater to the needs of women. By supporting local entrepreneurship, providing access to jobs and training, promoting skills development, and fostering a supportive environment for businesses owned by individuals of all sexes, genders, and gender identities, the Holborn Vision encourages entrepreneurship which would create local jobs that benefit everyone,</p> |

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| | | especially women who may face additional barriers to economic opportunities. |
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| Protected Characteristic | Is there potential positive impact? (Yes or No) | Explain the potential positive impact |
|--------------------------|---|--|
| Sexual orientation | Yes | <p>Some of the potential positive impacts outlined in all protected characteristics and other characteristics could benefit individuals based on their sexual orientation.</p> <p>The Holborn Vision has the potential to benefit communities by addressing the unique needs and challenges faced by LGBTQ+ individuals, creating a more equitable, inclusive, and safer environment.</p> <p>By supporting mixed-uses and improved public realm/spaces, the Holborn Vision can potentially enhance safety and accessibility for all residents, workers, and visitors, regardless of their sexual orientation. The Holborn Vision supports inclusive public spaces where LGBTQ+ individuals would feel safe and welcome, reducing the risk of harassment and discrimination.</p> <p>The Holborn Vision supports the provision of improved jobs, training, and entrepreneurship opportunities. These opportunities can be particularly beneficial for LGBTQ+ individuals who may face additional barriers to economic participation including discrimination.</p> <p>The Holborn Vision supports the provision of much-needed housing, including affordable housing. In London, the high cost of living makes it difficult for many LGBTQ+ individuals to find affordable accommodation, especially when combined with discrimination in the housing market.</p> <p>Affordable housing can benefit all LGBTQ+ individuals, including refugees and asylum seekers who are often at risk of homelessness and additional discrimination. It can also provide a safe and supportive environment for LGBTQ+ young people who may have had to leave their parental home due to family rejection.</p> |

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3.c Potential negative impact on other characteristics

| Characteristic | Is there potential negative impact? (Yes or No) | Explain the potential negative impact |
|------------------------------------|---|---|
| Foster carers | Yes | <p>Some of the potential negative impacts outlined in all of the protected characteristics and other characteristics could affect foster carers.</p> <p>The Holborn Vision, while aimed at improving the area, could inadvertently help to create challenges for foster carers.</p> <p>Increased property values and rents, a potential consequence of Holborn's improvements, could make it difficult for foster carers, especially those renting privately, to afford their homes. Relocation could disrupt the stability and continuity of care for the children in their homes.</p> <p>While improvements to Holborn may bring positive changes, the prospect of change can cause emotional stress for foster carers, potentially impacting their mental health and well-being, and consequently, the mental health and well-being of the children in their care.</p> <p>The Holborn Vision highlights the need to support all families, including foster families, by strengthening social infrastructure and using existing assets to bring people together. The Vision must align with policies set out in Camden's Adopted Local Plan, which was subject to its own extensive public consultation and EqIA.</p> |
| Looked after children/care leavers | Yes | See Foster Carers |

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| Characteristic | Is there potential negative impact? (Yes or No) | Explain the potential negative impact |
|-----------------------------|---|--|
| Low-income households | Yes | <p>Some of the potential negative impacts outlined in all of the protected characteristics and other characteristics could affect low-income households.</p> <p>Holborn already faces some of the highest housing and business costs in London. While the Holborn Vision aims to benefit everyone who lives, works, and visits the area, its guidance for development and investment could potentially lead to increased costs. This could disproportionately impact lower-income households.</p> |
| Refugees and asylum seekers | Yes | <p>Some of the potential negative impacts identified in relation to protected characteristics and other characteristics could affect Refugees and Asylum Seekers. The Vision must align with existing policies set out in the adopted Camden Local Plan.</p> <p>Proposed improvements to Holborn could inadvertently exacerbate challenges faced by refugees and asylum seekers. One significant concern is the potential for rising property values and rents, which could make affordable housing increasingly difficult to find. This is particularly problematic for refugees, who often face barriers to social housing and limited timeframes to relocate after their asylum applications are decided.</p> <p>A report for the Centre for Homelessness Impact and academics from the University of Huddersfield found a 223% increase in street homelessness for refugees leaving asylum accommodation between June and September 2023.</p> <p>While the Holborn Vision supports economic opportunities, in line with policies in the adopted local plan, there is a risk of exploitation, especially for vulnerable refugees and asylum seekers. Forced labour and human trafficking are potential threats, particularly in situations where individuals may feel pressured to accept low-wage or exploitative work arrangements.</p> |

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| | | |
| <p>Parents (of any gender, with children aged under 18)</p> | <p>Yes</p> | <p>Some of the potential negative impacts identified in all of the protected characteristics and other characteristics could disproportionately affect parents (of any gender, with children aged under 18).</p> <p>The Holborn Vision supports improvements to Holborn, which could potentially lead to an increase in costs including rents, due to improved infrastructure, attracting new businesses and residents with higher incomes, and increased demand. This increase in costs could pose a significant challenge for parents with young children. If families find the area becoming unaffordable and are forced to relocate, it could disrupt their routines, connections, friendships, and sense of security. Additionally, such a move would disrupt children's education as they would need to adjust to a new school environment. However, the Vision cannot make policy and must align with policies already set out in Camden's Adopted local plan.</p> |

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| Characteristic | Is there potential negative impact? (Yes or No) | Explain the potential negative impact |
|-------------------------|---|---|
| People who are homeless | Yes | <p>Some of the potential negative impacts outlined in all of the protected characteristics and other characteristics could affect individuals who are homeless.</p> <p>While residents have expressed concerns about public spaces attracting anti-social behaviour, the Holborn Vision aims to create a safer and more inclusive environment for all people living, visiting and working in Holborn. Consultation recognised the importance of addressing homelessness through housing and socioeconomic measures and the vision includes an objective to address this by working with partners to address homelessness in the area to ensure that every-one has somewhere they can call home.</p> <p>One of the objectives of the Holborn Vision is to design buildings and public spaces that reduce crime and anti-social behaviour. However, it is important to consider the potential negative impacts of such measures on homeless individuals.</p> <p>Hostile architecture also known as defensive architecture, often used to deter anti-social behaviour, can have severe consequences for homeless people. It can make it difficult for homeless people to find safe and comfortable places to rest or sleep which can lead to physical harm and psychological distress. Additionally hostile architecture can limit opportunities for homeless people for social interaction, contributing to feelings of isolation and despair. Hostile architecture can also push homeless individuals into more vulnerable situations and increase their risk of involvement in criminal activity.</p> |

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| Private rental tenants in deprived areas | Yes | <p>Some of the potential negative impacts outlined in all of the protected characteristics and other characteristics could affect private rented tenants in deprived areas.</p> <p>The Holborn Vision supports improvements to Holborn, which could potentially lead to an increase in costs, including rents. This increase could be driven by factors such as improved infrastructure, the attraction of new businesses and higher-income residents, and increased demand.</p> <p>Such rising costs could pose a significant affordability challenge for private rental tenants. If these tenants are forced to relocate due to increased expenses, it could disrupt their connections, support networks, and friendships.</p> <p>Additionally, the noise and disruptions associated with construction work or other changes could be particularly impactful, especially given the other stresses private rental tenants may be facing. However, the Vision cannot make policy and must align with policies already set out in Camden's Adopted local plan.</p> |
| Single parent households | Yes | <p>Some of the potential negative impacts outlined in all of the protected characteristics and other characteristics could affect single parent households.</p> <p>The Holborn Vision supports improvements to Holborn, which could potentially lead to an increase in costs, including rents. This increase could be driven by factors such as improved infrastructure, the attraction of new businesses and higher-income residents, and increased demand.</p> <p>Rising costs associated with improvements to the area could disproportionately affect single parent households, who are generally lower income than two parent households. If single parent households need to move out of the area, then this could be especially disruptive to their connections, support networks and friendships.</p> <p>Realising the Holborn Vision could be especially disruptive to Single Parent households in terms of any potential disruption to their routines and noise associated with construction. These challenges associated with regeneration can increase parental stress and anxiety, which can negatively impact child</p> |

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| | | <p>development. However, the Holborn Vision does not make policy but provides guidance on development in the area which can require construction in line with Camden's adopted Local Plan</p> |
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| Characteristic | Is there potential negative impact? (Yes or No) | Explain the potential negative impact |
|---------------------------|---|--|
| Social housing tenants | Yes | <p>Some of the potential negative impacts outlined in all of the protected characteristics and other characteristics could affect social housing tenants.</p> <p>The Holborn Vision supports improvements to Holborn, which could potentially lead to an increase in costs in general. This increase could be driven by factors such as improved infrastructure, the attraction of new businesses and higher-income residents, and increased demand. These driving factors could potentially make social housing tenants fearful of the future of their housing, which can cause stress and anxiety. Social housing tenants may feel a loss of control over their living situation, leading to feelings of powerlessness. However, guidance is proposed to address the needs of existing residents, increase the provision of much-needed housing (including affordable housing that contributes to the area's character), and support existing residential communities.</p> |
| Any other, please specify | | |

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3.d Potential positive impact on other characteristics

| Characteristic | Is there potential positive impact? (Yes or No) | Explain the potential positive impact |
|----------------|---|---|
| Foster carers | Yes | <p>Some of the potential positive impacts outlined in all protected characteristics and other characteristics could benefit foster carers.</p> <p>The Holborn Vision supports the increased provision of a wide range of new homes including affordable homes, and the services that sustain them. This can potentially provide foster carers with more suitable living spaces, including extra bedrooms for foster children, safer environments and better amenities. This can create a more stable environment for foster children, who may have experienced instability in the past.</p> <p>The Holborn Vision supports the creation of more high-quality and accessible, public realm including public open spaces and green areas. These spaces can provide foster families with opportunities for outdoor activities, exercise, and relaxation, which can benefit both physical and mental well-being.</p> <p>The Holborn Vision supports the creation of new jobs, educational and training opportunities which can provide foster children with greater opportunities to develop their skills, pursue their interests and build a brighter future, which can improve the well-being of foster families as a whole.</p> <p>Overall the Holborn Vision supports creating a more positive and supportive environment, and this can especially benefit foster carers and the children in their care. By improving living conditions, enhancing access to resources, and fostering stronger communities, the Holborn Vision and objectives can help foster carers provide the better care for vulnerable children.</p> |

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| <p>Looked after children/care leavers</p> | <p>Yes</p> | <p>See Foster Carers</p> |
| <p>Low-income households</p> | <p>Yes</p> | <p>Some of the potential positive impacts outlined in all protected characteristics and other characteristics could benefit low-income households.</p> <p>The Holborn Vision aims to strengthen existing residential communities by increasing the provision of much-needed housing, including a range of affordable and social housing, and the supporting services. This will help to ensure that low-income households can live in the area and access quality homes that meet their needs.</p> <p>The Holborn Vision prioritises employment and training opportunities, along with support for local businesses. This can help to facilitate skills training and employment support, enabling low-income residents to access new job opportunities and improve their long-term employment prospects.</p> <p>Recognising the importance of climate resilience, the Holborn Vision prioritises measures such as flood mitigation, urban greening for heatwave resilience, and energy-efficient housing. This will protect vulnerable low-income residents from extreme weather events and reduce energy costs. Furthermore, the Vision promotes access to local resources, potential green jobs, improved air quality, and accessible green spaces, contributing to better public health.</p> <p>The Holborn Vision promotes an improved public realm with more green and accessible public spaces where everyone feels safe, encouraging walking and cycling. This enhanced sense of safety and improved public realm will encourage low-income households to engage in outdoor activities and access more services and amenities that they may have previously not accessed.</p> |

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| | | <p>The Holborn Vision aims to celebrate the area's unique character, ensuring that new development builds upon and enhances it. This will create a pleasant and welcoming environment for all residents, fostering a sense of pride and belonging shared equally by low- and higher-income households.</p> |
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| Characteristic | Is there potential positive impact? (Yes or No) | Explain the potential positive impact |
|-----------------------------|---|---|
| Refugees and asylum seekers | Yes | <p>The potential positive impacts outlined for all protected and other characteristics could benefit refugees and asylum seekers.</p> <p>The Holborn Vision aims to strengthen existing residential communities by increasing the provision of much-needed housing, including a range of affordable and social housing, and supporting services. This is particularly beneficial for refugees and asylum seekers who may have specific needs due to their circumstances. Providing safe and secure housing is essential for refugees and asylum seekers who may have experienced trauma or displacement.</p> <p>The Holborn Vision supports the creation of employment, educational, and training opportunities, including potential language classes, vocational training, and skills development tailored to the needs of refugees and asylum seekers, thereby increasing their employability and facilitating financial independence.</p> <p>The Holborn Vision aims to create improvements to the public realm and open green spaces that feel safe and encourage social interaction, bringing together diverse communities. These spaces are particularly valuable for refugees and asylum seekers who may have experienced trauma and are vulnerable to social isolation.</p> |

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| <p>Parents (of any gender, with children aged under 18)</p> | <p>Yes</p> | <p>The potential positive impacts outlined for all protected and other characteristics could benefit parents of any gender with children aged under 18.</p> <p>The Holborn Vision aims to strengthen existing residential communities by increasing the provision of much-needed housing, including a range of affordable and social housing, and supporting services. This is particularly beneficial for parents of any gender with children aged under 18.</p> <p>The Holborn Vision aims to support local residents by providing increased access to jobs, training, affordable workspace, and entrepreneurial opportunities. These objectives are particularly important for parents concerned about opportunities for their children under 18.</p> <p>The Holborn Vision aims to create a public realm that encourages people of all ages to walk, cycle, sit, and socialise, including year-round opportunities for play. These objectives are particularly important for parents, who will benefit from knowing that safe and stimulating environments for play, socialisation, development, physical activity, and learning are available locally for their children.</p> <p>The Holborn Vision aims to create a climate-resilient place, potentially improving the quality of life for people of all ages. These objectives can help improve the well-being of parents with children under 18 who are concerned about the impacts of climate change.</p> |
| <p>People who are homeless</p> | <p>Yes</p> | <p>Potential positive impacts identified across all protected characteristics and other characteristics could benefit people experiencing homelessness.</p> <p>The Holborn Vision aims to strengthen existing residential communities by increasing the provision of much-needed housing, including a range of affordable and social housing options, alongside supporting services. This can lead to increased access to suitable and permanent housing for people experiencing homelessness, as well providing access to essential support services, which are particularly important for this vulnerable group.</p> <p>The Holborn Vision supports improvements to the public realm, including green spaces, creating safer, more welcoming, and more accessible environments for everyone. This could be particularly beneficial for people</p> |

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| | | <p>experiencing homelessness, contributing to safer and more secure public spaces and reducing vulnerability for those sleeping rough. These improvements could also potentially facilitate access to essential amenities, such as public toilets, washing facilities, and safe places to rest.</p> <p>The Holborn Vision supports the provision of increased employment and training opportunities. While specific targeted programmes are not explicitly detailed, these opportunities could potentially include dedicated training and employment support for people experiencing homelessness, helping them develop new skills, gain work experience, and improve their prospects for securing stable employment.</p> <p>The Vision includes an objective to directly address homelessness in the area by working with partners to ensure that everyone has somewhere they can call home.</p> |
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| Characteristic | Is there potential positive impact? (Yes or No) | Explain the potential positive impact |
|--|---|--|
| Private rental tenants in deprived areas | Yes | <p>Potential positive impacts identified in relation to all protected characteristics and other characteristics could benefit private rental tenants.</p> <p>The Holborn Vision aims to enhance existing residential communities by providing a diverse range of new homes, including affordable housing and supporting services. New housing developments will align with Camden's existing policies, prioritising accessibility, adaptability, self-containment, and quality. Homes will be designed to accommodate wheelchair users and be easily adaptable to future needs, making them particularly beneficial for older residents who wish to age in place and maintain their independence, in accordance with policies set out in the adopted Local Plan.</p> <p>Houses in Multiple Occupation (HMOs), protected by policy, consist of residential units with shared facilities such as kitchens and bathrooms. HMOs often offer more affordable rental options than self-contained dwellings, making them a valuable source of accommodation, particularly for young people.</p> <p>These objectives could be particularly beneficial for private rented tenants by potentially providing greater housing choice and affordability. Furthermore, potential improvements in housing quality could result in better insulation and energy efficiency, leading to lower energy bills.</p> |
| Single parent households | Yes | <p>Potential positive impacts identified in relation to all protected characteristics and other characteristics could benefit single parent households.</p> <p>The Holborn Vision aims to enhance existing residential communities by providing a diverse range of new homes, including affordable housing and supportive services. This initiative has the potential to positively impact several groups with protected characteristics, particularly single-parent households, a group disproportionately represented by women and often facing socio-economic disadvantages. The provision of affordable housing options could alleviate financial strain</p> |

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| | | <p>and improve housing security for these households.</p> <p>The Holborn Vision aims to support residents by providing increased access to jobs, training, affordable workspace, and entrepreneurial opportunities. This initiative has the potential to positively impact several groups with protected characteristics, particularly single-parent households, a group disproportionately represented by women and often facing socio-economic disadvantages. The potential benefits for single parents include increased access to employment and training opportunities closer to home, which could improve work-life balance and reduce childcare costs.</p> <p>The Holborn Vision supports the enhancement of climate resilience in homes, which can improve energy efficiency and reduce energy bills. While improved energy efficiency and reduced energy bills can benefit all households, they are particularly crucial for low-income households, including single-parent families.</p> <p>The Holborn Vision supports the creation of high-quality, accessible public spaces and green areas offers significant benefits, particularly for single-parent households. For single parents with children, these spaces provide: safe, free play areas promoting development and social interaction; convenient access to nature for physical activity and improved well-being; and opportunities for supervised play, potentially reducing short-term childcare needs. For single parents themselves, these improvements offer: improved mental health and reduced stress through access to green spaces; convenient locations for exercise and social connection, strengthening support networks; and free, accessible spaces for relaxation and respite.</p> |
| Social housing tenants | Yes | <p>Potential positive impacts identified in relation to all protected characteristics and other characteristics could benefit social housing tenants.</p> <p>The Holborn Vision aims to enhance existing residential communities by providing a diverse range of new homes, including affordable housing and supportive services. This includes the potential to improve existing social housing or replace older stock with new, high-quality homes that are more spacious, better designed, and meet tenants' diverse needs. The Holborn Vision prioritises climate resilience in new and improved homes, leading to lower energy bills and improved affordability. This also recognises that social housing</p> |

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| | | tenants are disproportionately likely to be on lower incomes and may experience health inequalities. Furthermore, all new housing will be designed to be accessible and adaptable, meeting the needs of tenants with disabilities and promoting inclusive living. |
| Any other, please specify | | |

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3.e Consider intersectionality.⁴ Given the evidence listed in step 2, consider and describe any potential **positive and negative impacts** this activity could have on people who have a **combination, or intersection, of two or more characteristics**. For example, people who are young, trans and homeless, disabled people on low incomes, or Asian women.

Intersectionality recognises that individuals can experience multiple forms of discrimination simultaneously, based on their protected characteristics. Considering potential impacts on individuals with intersecting characteristics is important. The following examples illustratively explores some of the potential impacts of the Holborn Vision when looking at intersectionality.

- Improved accessibility within the public realm could, for example, benefit older people of minority ethnic backgrounds with a disability. If the Holborn Vision leads to initiatives to improve access to healthcare or community services, this could also have a positive impact. However, if for example, improvements to the area leads to the closure of local community services or social spaces that individuals with these intersectional characteristics frequents, it could increase social isolation. If new housing were to be designed without accessibility in mind it could be unsuitable for their needs.
- Enhanced accessibility within the public realm would be essential for individuals with disabilities on low incomes who would benefit from improvements without having to pay to enjoy the public realm. However, the potential for a perceived change in the area that does not reflect the people who live there could offset the benefits. Therefore, ensuring the provision of genuinely accessible and free access to the improved public realm is important.
- Potential improvements to the public realm could benefit, for example, single mothers from minority ethnic backgrounds on low incomes, making it easier to manage work and family responsibilities. The support in development of safe and accessible play areas for children would be positive. However, if for example, improvements to the area leads to the loss of affordable housing or community support services this could have a negative impact on this group.

These examples are illustrative, and the Holborn Vision does mitigate the potential negative impacts outlined in them, within its role as an SPD. While the Holborn Vision has the potential to benefit people across all protected characteristics, careful consideration of intersectional impacts is essential, especially as planning applications are being developed and assessed, to ensure that no group is inadvertently disadvantaged and that positive outcomes are maximised for everyone.

² Intersectionality refers to the interconnected nature of social categorisations such as race, class, and gender as they apply to a given individual or group, regarded as creating overlapping and interdependent systems of discrimination or disadvantage.

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Step 4: Engagement - co-production, involvement or consultation with those affected

2.a How have the opinions of people potentially affected by the activity, or those of organisations representing them, informed your work?

Urban Symbiotics on behalf of Camden Council ran a public consultation on the draft Holborn Vision for a period of 6 weeks between 20 February and 1 April 2024. This consultation was carried out collaboratively between both Camden Council's Planning Team and Camden Council's Transport team, where early engagement on the Holborn Liveable Neighbourhood was also carried out, a project whose remit was located within a similar boundary as the Holborn Vision. This report highlights an integrated approach to engagement to help reduce fatigue and provide ample opportunities for stakeholders and communities to engage. The engagement also fulfilled its duty to comply with Camden Council's Statement of Community Involvement that defines how to consult on a Supplementary Planning Document (SPD).

Urban Symbiotics shared Camden Council's updated draft Holborn Vision document, along with exhibition material summarising the document, and invited feedback through a range of engagement methods. These included in-person conversations with the Urban Symbiotics team and Camden Council's Planning officers at all engagement events. The engagement sessions included four large engagement events, four street conversation pop-ups across the Holborn Vision project area, three resident focus groups, two business focus groups, four specialist user focus groups, and two children's focus groups. An online questionnaire was also available for feedback, and the updated draft Vision document was accessible at Holborn Library throughout the six-week consultation period. Two additional public drop-in sessions were held at Holborn Library, where Council officers were on hand to guide people through the consultation material, further enhancing its accessibility.

There were over 790 physical responses to the consultation and over 220 responses online*, totalling over 1000. These have provided a rich source of material to provide recommendations and considerations for the further development of the Holborn Vision.

The feedback informed the final Holborn Vision SPD.

The infographic below and the adjacent Table outlines the number of people engaged throughout the physical engagement process, including four street pop-ups, four exhibition event days, and 793 individuals reached. They also detail the events held, such as three resident focus groups, two business focus groups, four specialist user focus groups, and two children's focus groups.

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Physical Engagement Reach

DEMOGRAPHIC REACH

| EVENT | PARTICIPANT TYPE | AGE | ETHNICITY | ATTENDANCE NUMBERS* |
|---|--|--|---|----------------------|
| STREET POP-UPS  | Local residents, businesses, students, visitors, tourists, TfL staff, pedestrians, cyclists, drivers | Majority: 40s-60s 20s-30s 15s-20s | Majority: White, East Asian, South Asian, Black | 520 attendees |
| EXHIBITION DAYS  | Local residents, stakeholder, pedestrians, cyclists, drivers, taxi drivers | Majority: 30s-40s 50s-60+ Under 10s | Majority: White, East Asian, South Asian, Black | 18 attendees |
| BUSINESS FOCUS GROUPS  | Businesses, land owners | | Majority: white, South Asian | 7 attendees |
| SPECIALIST USER FOCUS GROUP  | Professional stakeholders, cyclists, women, disabled (RNIB) | | Black, East Asian | 25 attendees (total) |
| CHILDREN'S FOCUS GROUPS  | Local residents | 8-13 | South Asian / Bengali | 10 attendees |

Overall engagement insights

The Holborn Vision outlines six key objectives (HV1-HV6). Detailed information about each objective can be found in the SPD document and related consultation materials. A summary of the responses received for each objective is provided below:

Overview

HV2 (A genuinely mixed-use neighbourhood that brings together workers, residents, and visitors) was the most frequently mentioned objective, followed by HV6 (A place where the

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distinctive character areas of Holborn are celebrated and enriched). HV5 (A climate-resilient place that can adapt, thrive, and be ready to face the future) was the least mentioned among the objectives. It should be noted that whilst direct comments on climate were fewer, there was an extremely high number of mentions regarding the need for 'greener' public spaces, which was captured under HV4. The following summarises the insights per objective.

HV1: A Place of Innovation that Continues to Foster Business and Commerce

Insights include a request for business growth to be balanced with community welfare, specialist businesses, and support for areas to be protected, such as Hatton Garden. Further insights include the need to prioritise access, connectivity and enhanced footfall to support business activity by some.

HV2: Creating Vibrant Mixed-Use Neighbourhoods

The engagement responses to HV2 reflect a community whose priority is on supporting guidance that facilitates vibrant, inclusive, and safe mixed-use neighbourhoods that balance commercial needs with community wellbeing.

HV3: Addressing Local Population Needs

The engagement responses to HV3 welcomes a holistic approach to developing a Vision that prioritises housing, addresses homelessness, strengthens social infrastructure, and ensures the availability of affordable shops and services.

HV4: Improving Public Spaces

The engagement responses to HV4 highlight a positive response to enhance public spaces through increased greenery, better seating, pedestrian-friendly areas, effective wayfinding, and improved transport options. Concerns here focussed on ensuring that guidance supports spaces that can be well maintained, whilst ensuring that impact on traffic is mitigated.

HV5: Creating a Climate-Resilient Holborn

The engagement responses to HV5 were positive towards a climate-resilient Holborn, mostly focusing on greening and wellbeing. Managing traffic was seen to be key to improving air quality. Other issues raised include guidance to optimise waste management practices.

HV6: Celebrating Holborn's Distinctive Character

The engagement responses to HV6 highlight the community's priority in calls to strengthen the guidance on preserving, enhancing and celebrating Holborn's distinctive character through thoughtful development and historic preservation. Additional calls included an ask to support creative design, improved wayfinding, and the creation of public spaces that reflect local 16 identity.

Overview of Engagement Response to Character Areas

A quarter of all comments were focused on character areas, with the most frequently mentioned areas listed as follows:

1. Hatton Garden
2. Red Lion and Queen Squares
3. Museum Quarter
4. High Holborn/ Kingsway/Southampton Row
5. Gray's Inn/ Lincoln's Inn
6. Great Queen Street

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7. Tottenham Court Road

1. Hatton Garden

Hatton Garden was widely acknowledged as a vital character area for many of the participants with its considerable potential noted by many participants. Despite this, numerous concerns were raised about the lack of community spaces and issues with safety faced in Hatton Garden, Leather Lane Market, and Brookes Market. Participants felt these issues were not sufficiently addressed and suggested various improvements to serve residents better and enhance the area's appeal as a destination for visitors and shoppers.

2. Red Lion Square

Participants highlighted the strong resident communities in Red Lion Square, with many opposing any changes that might alter its historic character; these comments were in part triggered by a retracted image that does not currently reflect the Vision's ambition (It was an image that was mistakenly shown on the Holborn Liveable Neighbourhood Commonplace website, but was not used as supporting information for the Holborn Vision). There was general support for more affordable housing, whilst opinions varied on support for public realm changes and perceived pedestrianisation across different streets.

3. Museum Quarter

Feedback suggested that the Museum Quarter is highly valued for its heritage, with many participants emphasising the importance of recognising and preserving its historical significance. Support to enhance the setting of the British Museum and cultural assets is welcomed. Concerns were raised about the perceived treatment of the Museum Quarter as a business area by developers, primarily due to the recent approval of the Selkirk House development. Whilst the Vision highlighted an approach that respects the areas' cultural and historical importance, some still remain concerned.

4. High Holborn, Southampton Row, and Kingsway

Feedback on High Holborn, Southampton Row, and Kingsway predominantly highlights participant concerns about road safety, traffic management, and street cleanliness. There was significant discussion about pedestrianisation and ideas to use closed office lobbies better, alongside requests for the preservation of street stalls outside of Holborn Station.

Lincoln's Inn and Gray's Inn

Feedback on Lincoln's Inn and Gray's Inn highlighted various concerns and suggestions that included better accessibility and space for social infrastructure such as community facilities and spaces for recreation. Additionally, there were calls for the Vision to support more effective promotion of the area to enhance its appeal and usability for both residents and visitors.

5. Great Queen Street

Feedback on Great Queen Street revealed mixed sentiments about proposed public realm changes and its Vision. Participants supported the preservation of the area's character whilst raising concerns regarding crime and personal safety issues. Whilst there was support for specific improvements, such as pavement enhancements on Drury Lane, overarching issues related to safety, accessibility and character integration within future developments for the area.

6. Tottenham Court Road

There were limited responses to this character area. When commented on, the Tottenham Court Road area was described as having great challenges. This included an extremely busy public realm, reduced access to taxis, and a high incidence of thefts. These key concerns were

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used to highlight participants’ requests for support to improve safety and accessibility in this area and for the rest of Holborn to avoid replicating this type of environment.

REFLECTING

The Holborn Vision Consultation Report, produced by Urban Symbiotics in August 2024, offers a comprehensive analysis of the insights gathered during the consultation process and a detailed demographic profile of the respondents. While the consultation and engagement responses were collected and analysed without categorisation based on protected characteristics or other specific demographics, the feedback can be correlated with these groups to help determine potential positive and negative impacts.

| List the groups you intend to engage and reference any previous relevant activities, including relevant formal consultation?⁵ | If engagement has taken place, what issues were raised in relation to one or more of the protected characteristics or the other characteristics about which the Council takes an interest, including multiple or intersecting impacts for people who have two or more of the relevant characteristics? |
|---|---|
| | Engagement has taken place and previous sections of this EqIA highlight issues related to one or more protected characteristics. |
| | |

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4.b. Where relevant, record any engagement you have had with other teams or directorates within the Council and/or with external partners or suppliers that you are working with to deliver this activity. This is essential where the mitigations for any potential negative impacts rely on the delivery of work by other teams.

The Holborn Vision SPD has been developed through extensive and ongoing engagement with various teams and directorates within the Council. This engagement has been a continuous process throughout the SPD's preparation, with specific periods of focused engagement before the public consultation in February 2024 and following the analysis of consultation feedback in October 2024. This internal engagement has included the following teams and directorates:

- **Transport:**
 - Transport Strategy and Projects (including the Holborn Liveable Neighbourhood and Safe and Healthy Streets teams)
- **Planning:**
 - Planning Policy and Implementation
 - Development Management
- **Leisure and Green Spaces:**
 - Head of Leisure (including the Green Spaces and Park Services teams)
- **Community and Economy:**
 - Community Partnerships
- **Inclusive Economy**
 - Inclusive Economy (including the Business Growth and Markets Development teams)
- **Data and Analysis:**
 - Insights, Learning and Impact
- **Culture:**
 - Head of Culture
- **Environment and Sustainability:**
 - Head of Climate, Air Quality and Energy (including the Climate Adaptation and Resilience and Sustainability teams)
- **Community Safety:**
 - Community Safety Team

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Step 5: Informed decision-making

5. Having assessed the potential positive and/or negative impact of the activity, what do you propose to do next?

Please select one of the options below and provide a rationale (for most EqlAs this will be box 1). Remember to review this and consider any additional evidence from the operation of the activity.

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| <p>1. Change the activity to mitigate potential negative impacts identified and/or to include additional positive impacts that can address disproportionality or otherwise promote equality or good relations.</p> | <p>This Supplementary Planning Document (SPD) has been prepared to provide guidance for development within Holborn. While designed to shape and influence development outcomes, the SPD does not introduce new planning policy. Its function is to provide further detail to existing policies including those established within the adopted Local Plan. Therefore, the SPD operates within the established policy context, amplifying existing strategic objectives and providing a more granular level of guidance for development proposals.</p> <p>As a material consideration in the determination of planning applications, the SPD carries weight and will be considered by decision-makers. It directly responds to the strategic priorities outlined in the "We Make Camden" initiative which had extensive public consultation, ensuring alignment with broader community aspirations and strategic objectives for the borough.</p> <p>A key aspect of the SPD's development has been extensive community engagement. The consultation process undertaken exceeded the requirements set out in the Statement of Community Involvement. A proactive approach to engagement ensured that a wide range of stakeholders, including local residents, businesses, and community groups, had the opportunity to contribute to the development of the SPD. The feedback received has been carefully considered and has directly informed the content and direction of the document. The extensive consultation represents the fullest engagement with the community's needs within the defined scope of an SPD.</p> <p>The developments guided by the SPD might affect different groups in different ways, including people with protected characteristics and this EqlA has</p> |
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| | <p>been carried out to look at these potential impacts. While the EqlA highlighted some possible negative impacts, these can be addressed through the guidance in the SPD and by continuing to engage with local people, internal and external partners, especially as development proposals are being developed and planning applications come forward. The EqlA also found significant positive impacts for people with protected characteristics, especially in areas like accessibility, public spaces, inclusive design, housing including affordable housing, jobs, training, and employment opportunities. These potential positive impacts, which are expected to significantly improve quality of life, far outweigh any potential negative impacts that can be mitigated. Furthermore, feedback from local communities engaged in the public consultation for the draft SPD was overall positive.</p> <p>SPDs are not intended to prevent development from occurring, nor are they used to create or amend existing planning policies. Their purpose is to mitigate the potential negative impacts of development and maximise positive outcomes by providing detailed and specific guidance for planning applications. This guidance aims to ensure that development proposals are consistent with the strategic objectives of the Local Plan and address local concerns. Within these clearly defined constraints, the SPD seeks to maximise positive outcomes for the community, acknowledging the inherently limited impact it can have on overarching policy direction. The document provides a framework for evaluating proposals and ensuring they contribute positively to the local communities, character and function of Holborn, within the established planning policy framework.</p> |
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2. Continue the work as it is because no potential negative impacts have been found

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| <p>3. Justify and continue the work despite negative impacts (please provide justification – this must be a proportionate means of achieving a legitimate aim)</p> | |
| <p>4. Stop the work because discrimination is unjustifiable and there is no obvious way to mitigate the negative impact</p> | |

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Step 6: Action planning

6. You must address any negative impacts identified in steps 3 and/or 4. Please demonstrate how you will do this or record any actions already taken to do this.

Please remember to add any positive actions you can take that further any potential or actual positive impacts identified in step 3 and 4.

Make sure you consult with or inform others who will need to deliver actions.

| Action | Due | Owner |
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| <p>The Supplementary Planning Document (SPD) has been prepared to provide guidance for development within Holborn. While designed to shape and influence development outcomes, the SPD does not introduce new planning policy. Its function is to provide further detail to existing policies including those established within the adopted Local Plan. Therefore, the SPD operates within the established policy context, amplifying existing strategic objectives and providing a more granular level of guidance for development proposals.</p> <p>SPDs are not intended to prevent development from occurring. Their purpose is to mitigate the potential negative impacts of development and maximise positive outcomes by providing detailed and specific guidance for planning applications.</p> <p>The SPD aims to ensure that development proposals are consistent with the strategic objectives of the Local Plan and address local concerns. Within these clearly defined constraints, the SPD seeks to maximise positive outcomes for the community, acknowledging the inherently limited impact it can have on overarching policy direction.</p> <p>The SPD provides a framework for evaluating proposals and ensuring they contribute positively to the local communities, character and function of</p> | | |

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| Holborn, within the established planning policy framework. | | |
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Step 7: EqIA Advisor

Ask a colleague, preferably in another team or directorate, to 'sense check' your approach to the EqIA and ask them to review the EqIA form before completing it.

They should be able to clearly understand from what you have recorded here the process you have undertaken to assess the equality impacts, what your analysis tells you about positive and negative actual or potential impact, and what decisions you have made and actions you have identified as a result.

They may make suggestions for evidence or impacts that you have not identified. If this happens, you should consider revising the EqIA form before completing this version and setting a date for its review.

If you feel you could benefit from further advice, please contact the Equalities service at equalities@camden.gov.uk

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Step 8: Sign-off

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| EqIA author | Name - George McKenzie Job title - Senior Engagement Officer Date 08/01/2025 |
| EqIA advisor / reviewer | Name - Jane Debono Job title – Principal Planner Date 08/01/2025 |
| Senior accountable officer | Name - Richard Wilson Job title – Strategic Lead Place and Design Date 08/01/2025 |