

Equalities Impact Assessment

Camden Council

What is an Equality Impact Assessment?

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

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

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

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

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

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

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

Name of proposed decision/policy being reviewed:

Canalside to Camley Street Supplementary Planning Document

Question 1

What is changing and why?

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

What is changing and why?

Camden Council has prepared the Canalside to Camley Street Supplementary Planning Document (SPD) which, following public consultation, is intended to be adopted as planning guidance relating to the area around Camley Street and St Pancras Way.

The Council's adopted Local Plan identifies the Camley Street area as a Community Investment Programme (CIP) regeneration area and area of expected growth. The Local Plan identifies four key emerging priorities for the area.

- **Creating a more vibrant, attractive area** that builds on its location adjacent to King's Cross Central and close to Camden Town
- **Enhanced connectivity and public realm**, with more active overlooking of the street at different times of the day
- **Creating new public spaces and greening of the street environment**
- **Making more efficient and intensive use of land**, taking opportunities to provide a mix of uses, including new housing and employment floorspace

The Local Plan says that the Council will produce a vision or planning framework to ensure that growth and change takes place in an integrated and sustainable way. The guidance is based on Council policies in the adopted Local Plan which was itself subject of an Equalities Impact Assessment (EqIA). The Camley Street Neighbourhood Plan (which covers a smaller area than the SPD) has also been subject of an EqIA.

The Canalside to Camley Street area has been seeing a considerable amount of development activity and interest, with proposals for a number of sites in the pipeline and likely to come forward. This includes significant development in neighbouring Kings Cross Central and the transformation of Agar Grove Estate to the north. Further schemes at the south end of Camley Street have been completed. In addition, proposals have emerged for sites along St Pancras Way including St Pancras Hospital, the 'Ugly Brown Building' site, St Pancras Commercial Centre and Bangor Wharf. The proposal for the 'Camden Highline', a new linear park linking the area to Camden Town, is gathering momentum, alongside other plans to improve the canal. The Council is also considering the future for two of its sites in Camley Street under the Community Investment Programme.

In view of the change that is happening and likely to evolve and to identify key issues and opportunities that need to be addressed the guidance for the Canalside to Camley Street area aims

to establish some planning principles and objectives to support and guide future development and area improvements.

What are the decision makers being asked to decide?

The Council approved a draft Canalside to Camley Street SPD for consultation purposes in June 2019. Consultation was due to take place in spring 2020, but was postponed due to the coronavirus (Covid 19). The consultation was held over the summer until 25th September 2020. An EquIA was prepared and published for the proposed SPD and has been reviewed and updated where relevant in advance of planned adoption.

Following consultation, responses were considered and the draft SPD revised to respond to the feedback received. A consultation feedback report was separately produced. It is planned to adopt the final version of the SPD in November 2021.

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

The SPD provides area based planning guidance based on policies and priorities which have already been adopted in Camden's adopted Local Plan. It does not create new policies, but seeks to set out in more detail how planning policies might be implemented.

The SPD does not in itself authorise or action development proposals and improvements to take place in the area, which will be made by relevant landowners and other agencies and through decisions on related planning applications. It will be a guide for planning and decision-making alongside other plans and policies if development proposals come forward. Depending on the nature and scale of those development proposals these will have their own consultation and require more detailed assessments of their impacts socially, economically and environmentally.

The SPD aims to ensure that new development can contribute positively to improving the area from which local communities can share the benefits. It aims to promote mixed, balanced and sustainable communities, and well planned and designed development and improvements that focus on three broad objectives:

- Realising the potential of the area-to make more effective use of land to meet housing needs and enhance the employment role of the area in high quality developments
- Improving connectivity-to make the area, sites and developments more inclusive and accessible and make it easier to get around
- Improving spaces for people- to create and improve public spaces such as open spaces, walking/cycling routes and the public realm as part of, and adjacent to, new developments

The purpose of the SPD should be positive in terms of its potential impacts in guiding future development and associated improvements.

Notes to Question 1

- Summarise briefly and precisely just what the decision is about. In particular what changes will happen if this decision is agreed and put into effect? What happens now and what will happen in the future? What will be different?
- **Do not cut and paste the report or policy** but concisely restate it, considering equalities issues directly against the facts
- **Focus on the impacts on people** e.g. the users of any facility or service.

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Question 2

Who will be affected by this decision and how?

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

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

New development may also have both negative and positive impacts through the loss, replacement or delivery of community facilities or types of new employment space and housing and their affordability.

Where development is expected to lead to an increase in an area's population, s106 planning obligations can be secured to address the impacts of development and possible additional demands on local services or facilities. This can indirectly provide benefits for the existing local community. Local people can also identify and prioritise local projects for funding using the Community Infrastructure Levy (CIL), a charge applied to most types of major development.

Socio economic profile of groups with protected characteristics

The adoption of the SPD will be particularly relevant to existing and future communities of the Canalside to Camley Street area including residents and businesses.

Most of the data in this EquIA is from the last Census carried out in 2011. Since the Census was conducted the Indices of Deprivation 2019 and GLA 2017 – based population projections (by borough and ward) have been published with the latter indicating projected population growth in the area.

A principle aspect of this EquIA is to have an understanding of the proportions of residents with protected characteristics potentially to be affected and a good indication of this can still be achieved from the last Census data, even as the population rises (and population projections are subject to change).

The SPD Area

The Canalside to Camley Street SPD area is to the north of St Pancras and Somers Town ward and lies adjacent to the southern end of Cantelowes ward.



Population Projections

Table 1: GLA 2019-based Population Projections - LB Camden

Ward / Borough	2011	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031
St Pancras and Somers Town	13,790	18,577	18,799	19,107	19,446	19,938	20,323	20,973	21,645	22,159	22,632	23,144
Cantelows	11,941	14,620	14,463	14,406	14,366	14,371	14,419	14,497	14,616	14,676	14,714	14,706
Camden (sum of wards)	220,087	264,122	262,805	262,230	262,568	263,628	265,389	267,784	270,842	273,677	276,406	279,203

The resident population of St Pancras and Somers Town ward at mid-2021 was projected to be 18,577 people, ranking it the largest ward in the borough by projected population size. At mid-2021 Cantelows ward was projected to be 14,620 people ranking it the 10th largest ward in the borough by population size.

For the period 2021 – 2031 there is a borough wide projected population growth of +5.7%. However, population growth for St Pancras and Somers Town ward is projected to increase by + 24.6%. Cantelows ward is projected to have a marginal increase by + 0.6%.

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

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

Covid-19 Pandemic in the United Kingdom

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

There have been more than 9.3 million confirmed cases of coronavirus in the UK and more than 142,000 people have died within 28 days of testing positive for coronavirus, government figures show.

More than 50 million people, or 87% of those aged 12 and over in the UK have received a first dose of vaccine and nearly 80% have received a second dose. (*Gov.uk dashboard - 8 November 2021*). Research suggests that getting vaccinated does not stop the spread of Covid-19 but could reduce the severity of the illness.

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

- The total number of new cases in week 44 (25th – 31st October 2021) was 526, this is down by 62 since previous week.
- The weekly incidence rate (new cases) per 100,000 population for the latest week is 188, a decrease from previous week (week 43)
- As of 25th October, a total of 346 deaths in Camden have been Covid-19 related. There has been 0 Covid-19 related deaths in the latest week of data.
- As of the 31st October, 164,430 of Camden residents have received at least their first dose of vaccine.
- London's R number as of the 29th October was 1.0 to 1.2. This means on average every 10 people infected will infect between 10 and 12 other people. If the R value is above 1 the pandemic is growing, if it is below 1 the pandemic is shrinking.

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

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

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

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

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

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

Deprivation

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

The most deprived LSOA in St Pancras and Somers Town ward is to the west and outside of the SPD area (E01000959), and, taking in social housing around Bayham Street and Royal College St, is in to top 14% most deprived in England and the 5th most deprived in Camden. The second most deprived LSOA in the ward is to the south and east of the SPD area (Top 16% in England and ranked 10th in Camden). Most of this LSOA now includes Kings Cross Central, but extends

to part of Somers Town including social housing in Cooper's Lane Estate.

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

Map of IMD 2019 (with 2015, 2010, 2007 and 2004 shown beneath for comparison)
Indices of Deprivation 2019: Index of Multiple Deprivation (IMD) Rank

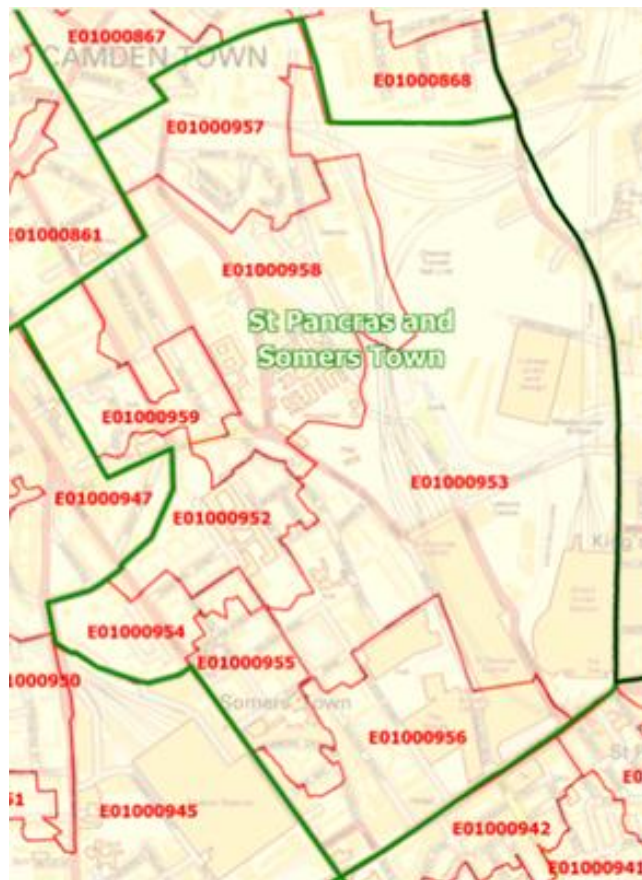
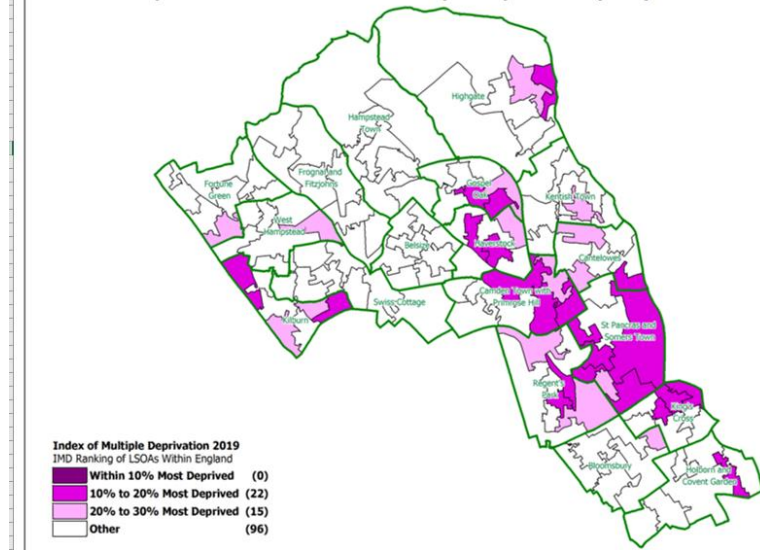


Table 2: Indices of deprivation 2019 - St Pancras and Somers Town Ward
 Ministry of Housing, Communities & Local Government, © MHCLG, 2019

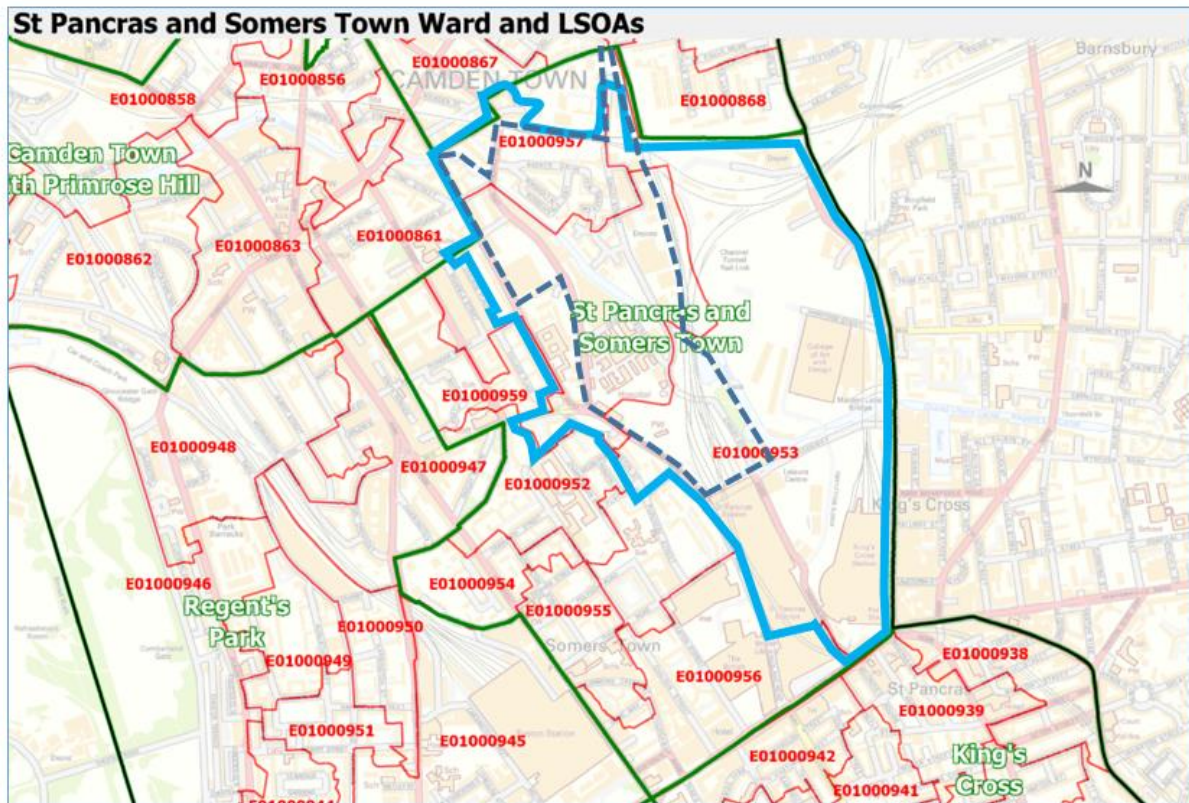
LSOA Code	Rank in Camden (/133)	% Most deprived in England
E01000952	22	19.8%
E01000953	10	15.7%
E01000954	14	18.1%
E01000955	23	20.0%
E01000956	20	19.5%
E01000957	38	30.4%
E01000958	45	33.6%
E01000959	5	13.8%

The SPD Area

Output Areas (OAs) are the smallest units for which Census data are published. The combination of OAs that most closely correspond with the SPD area have been used to obtain demographic statistics for this EquIA and is larger than the SPD area alone and is therefore referred to as SPD Area+. At the time of the last Census, most of the additional area consisted of the then largely undeveloped Kings Cross railway lands with limited housing. The SPD Area+ is 82 hectares and at the time of the Census had a population of 2,871 with 1,132 households.

Since the census was conducted the local demographic landscape has changed and continues to evolve.

Map of the SPD area, Combined Output Areas and Wards



Most of the long-standing and permanent residential community within the SPD area reside in Elm Village which has a mix of housing tenures. There are some mainly private blocks of flats along St Pancras Way and housing association flats at Goldington Buildings across the road from the St Pancras Hospital. There is also a small pocket of terraced housing to the north-west of the SPD area on Royal College St.

There are student housing blocks on College Grove and since the last census a 563 room student housing scheme has been constructed at 11-13 St Pancras Way and mixed use schemes at the southern end of Camley Street are completed or nearing completion with approximately 320 homes and 300 student rooms. To the north (just outside of the SPD area) are Agar Grove (with 507 new or replacement homes which will be a mix of council homes, intermediate rented homes and homes for sale) and Maiden Lane estates (where 273 new 1, 2 and 3 bedroom homes, landscaped public spaces and improved community facilities have been built), where the Council has been leading on the development of these estates under the Community Investment Programme (CIP).

The SPD area is also a short walk away from Kings Cross Central, where development is seeing further buildings and uses including new housing, offices, facilities and public spaces continuing to emerge.

Home Ownership

Table 3: Housing Accommodation– Census 2011

Housing Tenure	SPD Area+	Area %	Camden Average
All People	2,871		
Area (hectares)	82		
Owned / part owned	340	30%	32.9%
Owned outright	95	8.4%	17.1%
Owned-mortgage or loan	143	12.6%	15.1%
Shared ownership	102	9%	0.7%
Social rented	404	35.7%	33.1%
Council social rented	248	21.9%	23%
Other social rented	156	13.8%	10.1%
Private rented	377	33.3%	32.2%
Private landlord / letting agency	351	31%	30.5%
Other private rented	26	2%	1.8%

The proportions of residents who own and rent their homes in the SPD Area+ is similar to the borough wide proportions. A significant majority (69%) in the SPD Area+ rent their homes with approximately half of this proportion socially renting.

Table 4: Housing and Accommodation – Census 2011

Household Spaces	SPD Area+	Area %	Camden Average
All People	2,871		
Area (hectares)	82		
Whole house or bungalow	221	19%	14.8%
Detached	11	0.9%	1.9%
Semi-detached	39	3.4%	4.1%
Terraced (incl. end terrace)	171	14.7%	8.8%
Flat, maisonette or apartment	932	80.3%	85.2%
Purpose-built block of flats or tenement	838	72.2%	52.3%
Converted/shared house (inc bed-sits)	90	7.8%	29.8%
In a commercial building	4	0.3%	3.1%
Caravan, mobile or other temporary structure	8	0.7%	0.1%

A significant majority of residential properties in the SPD Area+ are flats, maisonettes or apartments (80.3%) and this is marginally less than the borough wide proportion of 85.2%. There are however a significantly larger proportion of purpose built blocks (72.2%) in the SPD Area+ than the borough wide proportion of 52.3%. In addition there is noticeable amount of purpose built student housing locally.

There is a marginally higher proportion of houses (19%) in the SPD Area+ than there are borough wide (14.8%).

Overcrowding

Table 5: Occupancy Rating - Census 2011

Household Spaces	SPD Area+	Area %	Camden Average
All People	2,871		
Area (hectares)	82		
Occupancy rating (rooms) of – 1 or less	347	30.7%	32.5%

Almost a third of housing in Camden (32.5%) is overcrowded and has an occupancy rating of -1 which implies that a household has one fewer room or bedroom than required by the household. The occupancy rating (rooms of -1 or less) for the SPD Area+ (30.7%) which although significant is marginally less than the borough wide proportion of 32.5%.

Groups with protected characteristics

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

Sex

Table 6: Sex - Census 2011

Sex	SPD Area+	SPD Area+ %	Camden Average
All People	2,871		
Area (hectares)	82		
Male	1,356	47.2%	49%
Female	1,515	52.8%	51%

The proportion of male (47.20%) to female (52.80%) residents is broadly in line with borough wide proportion (Male 49% / Female 51%).

Age

Table 7: Age, Combined output areas - Census 2011

Age	SPD Area+	SPD Area+ %	Camden Average %
All People	2,871		
Area (hectares)	82		
0-4	156	5.4%	6%
5-15	313	10.9%	10.1%
16-29	1,081	37.7%	26.6%
30-44	754	26.3%	27%
45-59	349	12.2%	15.2%
60-74	161	5.6%	10.1%
75-89	56	2.0%	4.5%
90+	1	0	0.5%

The age profile of local residents was broadly in line with the borough wide profile at the time of the last Census. There is however a significant difference with residents aged 16 to 29 in the SPD Area+ (37.7%) who are the largest proportion by age group and larger than the Camden average of 26.6%. Residents aged 30 to 44 are the second largest age group (26.3%), which is marginally lower than the Camden average of 27%. The third largest age group are residents aged 45-59 (12%), which is noticeably lower than the Camden proportion of 15.2%.

Proportionally there are fewer than half the amount of residents aged 75+ in the SPD Area+ (2%) than there are borough wide (5%). In addition, the number of one person households for residents aged 65+ (5.2%) is half of the borough wide proportion of 10.4%.

Prior to vaccination older adults and people of any age with serious underlying medical conditions like heart or lung disease or diabetes were at higher risk for developing more serious complications and die from COVID-19 illness. Although the vaccination programme appears to be

successful in the UK, there will continue to be a need for services, communities and community groups to provide extra care and support to vulnerable older people as Covid-19 has significantly impacted these groups.

All residents aged 16 to 74 fall within the economically active age bracket and make up 82% of the total population in the SPD Area+, which is marginally higher than the Camden average of 79%. Young residents aged 0-15 make up 16.3% of the total population, which is marginally higher than the borough wide proportion of 16.1%

There is one school in the SPD area. The Abacus free school temporarily occupies a site south of Elm Village, but has plans to relocate. Though it provides primary age schooling, the school's catchment is outside of the SPD area and aims to serve the Belsize Park area (hence children are bussed in to attend). Edith Neville Primary School and nursery lie south-west of the SPD area. The school has approximately 200 students and the majority have minority ethnic heritage. According to the school, the proportion of children who speak English as an additional language is well above average.

Kings Cross Academy is a relatively new school located east of the SPD area, which provides 26 nursery places and will provide 420 primary places by 2021. The neighbouring Frank Barnes School for Deaf Children provides specialist education serving all London boroughs and beyond. St Michaels and Our Lady's primary schools lie west of the SPD area. There are three secondary schools in close proximity to the area: Regents High and Maria Fidelis to the south-west and Camden School for Girls to the north.

Agar Children's Centre is just north of the SPD area and provides services for children under five and their families within the locality. New community facilities are planned to be built in later phases of the Agar Grove Estate redevelopment close to Camley Street.

Maiden Lane Community Centre is just north-east of the SPD area and provides a range of provisions for all ages. These include Maiden Lane pre-school club as well as services for young people that include teen boys and girls groups, a teen club, 10 to 14 football league and a general youth club. The centre also provides services for adults including a shed project for older men, women's healthy breakfast club and craft workshops.

St Pancras Community Centre lies to the south west outside of the SPD area, and provides a range of facilities for young and older people including a youth and music club and a food club for local people aged 60 and over. Plot 10 provides children's play facilities and out of school hours services.

Race

Table 9: Race, Combined OAs - 2011 Census

Race	SPD Area + No	SPD Area+ %	Camden %
White	1639	57.1%	66.3%
English/Welsh/Scottish/Northern Irish/British	1056	36.8%	44%
Irish	95	3.3%	3.2%
Gypsy or Irish Traveller	5	0.2%	0.1%
Other White	483	16.8%	19%
Mixed / Multiple Ethnic Groups	164	5.7%	5.6%
White and Black Caribbean	39	1.4%	1.1%
White and Black African	37	1.3%	0.8%
White and Asian	38	1.3%	1.8%
Other Mixed	50	1.7%	1.9%

Asian / Asian British	580	22.2%	16.1%
Indian	78	2.7%	2.8%
Pakistani	13	0.5%	0.7%
Bangladeshi	282	9.8%	5.7%
Chinese	67	2.3%	2.9%
Other Asian	140	4.9%	4%
Black / African / Caribbean / Black British	345	12%	8.2%
African	242	8.4%	4.9%
Caribbean	49	1.4%	1.6%
Other Black	63	2.2%	1.7%
Other Ethnic Group	143	5%	3.8%
Arab	48	1.7%	1.6%
Any other ethnic group	95	3.3%	2.3%

Most residents in the SPD Area+ are White (57%), and the majority of White residents (37%) are English/Welsh/Scottish/Northern Irish/British. The proportion of White residents is significantly lower than the borough wide proportion of 66.3% of which 44% are English/Welsh/Scottish/Northern Irish/British. Other white residents in the SPD Area+ (17%), many of whom will not have English as a first language, is marginally lower than the Camden profile of 19%.

The second largest ethnic group are Asian or Asian British residents (22%), which is noticeably higher than the borough wide proportion of 16%. Bangladeshi residents make up the largest proportion of Asian or Asian British residents in the SPD Area + (10%), and is significantly higher than the 6% borough wide proportion.

Residents who are Black or Black British are the third largest ethnic group (12%), which is noticeably larger than the borough wide proportion of 8%. Most residents who are Black or Black British in the SPD Area + are of African descent (8%), and is higher than the 5% borough wide proportion.

Camden Council has publicly announced that it stands in solidarity with Black Lives Matter and acknowledges that racism is here in our communities. There is work going on alongside communities to address racial injustice and more specifically disproportionality in the youth justice system. The Council does however acknowledge that there is more work to do to challenge racial inequality at every level.

Covid 19 Pandemic and Race:

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

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

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

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

communities.

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

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

The London Irish Centre is based just outside of the SPD area to the north and the charity's mission is to bring Irish Care, Culture and Community to London. This is supported by a wide range of services to help tackle poverty, relieve those in need, education for the public benefit and to promote Irish art and culture.

Pan African Housing Co-op is based to the north west of the SPD area provides accommodation for refugees from Africa and other parts of the 'developing' world. The Co-op also provides resettlement support and immigration advice.

In addition there is a Somali Elderly and Disabled centre who provide advice and support to elderly and disabled refugees from Somalia.

There are a number of groups providing services to the Black, Asian and Minority Ethnic community close to the SPD area including several that serve the Bengali community mainly to the south-west of the SPD area. This includes Jeebon Bengali Healthy Living Consortium and also Somers Town Islamic Cultural and Education Centre.

Religion / Belief

Table 10: Religion or Belief, Combined OAs - 2011 Census

Faith	SPD Area+ No	SPD Area+ %	Camden %
Christian	956	33.3%	38.5%
Buddhist	18	0.6%	1.4%
Hindu	35	1.2%	1.6%
Jewish	16	0.6%	5.1%
Muslim	567	19.7%	13.8%
Sikh	8	0.3%	0.2%
Other	24	0.8%	0.6%
No religion	712	24.8%	29.1%
Religion not stated	535	18.6%	9.6%

Most residents in the SPD Area+ are of Christian faith (33.3%) and the proportion is marginally lower than the Camden average (38.5%). This is followed by not having a religion (24.8%) which is also marginally lower than the borough wide profile of 29.1%. The Muslim faith is the second most practiced religion locally (19.7%), which is noticeably higher than the borough wide profile of 13.8%.

St Pancras Old Church is a Church of England parish church from the 12th Century and is the only place of worship within the SPD area. Al Rahman Mosque and Community Centre is to the south east of the SPD area and Somers Town Islamic Cultural and Education Centre is to the south-west. All Saints Greek Orthodox Church lies to the west of the SPD area.

St Aloysius Catholic Primary School was a faith school close to the SPD area to the south west, but closed in 2019 due to unfilled places and a fall in numbers of primary school age children in the area.

Disability / long term illness

Table 11: Disability and Long Term Illness - 2011 Census

Long term sick or disabled	SPD Area + No	SPD Area+ %	Camden %
All Men aged 16-74	62	5.6%	4.8%
All Women aged 16 - 74	61	4.9%	4.0%

The proportion of residents in the SPD Area+ who are economically inactive due to long term sickness or disability (5.6% Men / 4.9% Women), is marginally higher than the borough wide proportion (4.8% Men / 4.0% Women).

The St Pancras Hospital site is within the SPD area and is allocated for development in the Council's adopted Site Allocations Development Plan 2013. This plan supports the effective use of the site for improved and new health facilities as well as new housing on surplus land. The latest plans includes Moorfields Eye Hospital and UCL Institute of Ophthalmology, which are planned to relocate from City Road in Islington to new facilities on the north west part of the site. These are proposed to be developed alongside new Camden & Islington NHS Trust facilities, other health services including a UCL mental health research institute and other uses, including housing. These service changes and future proposals have been subject to their own public consultations and EquIA.

As previously mentioned Frank Barnes School for Deaf Children is to the east of the SPD area and serves all London boroughs and beyond.

Sexual orientation

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

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

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

Gender reassignment

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

Pregnancy and Maternity

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

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

Marriage and Civil Partnership

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

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

Table 12: Household Composition, Combined OAs - 2011 Census

Household Composition	SPD Area + No	SPD Area+ %	Camden %
All households	1,132	100%	100%
One person households	352	31.1%	40.5%
Aged 65+	59	5.2%	10.4%
Other	293	25.9%	30.2%
One family and no others	495	43.7%	42.6%
Aged 65+	13	1.1%	2.7%
Married / Civil Partnership couple	196	17.3%	20.2%
No children	65	5.7%	7.2%
Dependent children	100	8.8%	10.5%
All children non-dependent	31	2.7%	2.4%
Co-habiting couple	141	12.5%	9.8%
No children	113	10.0%	7.5%
Dependent children	22	1.9%	2.0%
All children non-dependent	6	0.5%	0.3%
Lone parent	145	12.8%	10.0%
Dependent children	101	8.9%	6.4%
All children non-dependent	44	3.9%	3.5%
Other households	285	25.2%	16.9%
With dependent children	39	3.4%	3.1%
All full-time students	81	7.2%	2.4%
All aged 65 and over	4	0.4%	0.3%
Other	161	14.2%	11.1%

In terms of household composition, there is a higher proportion of co-habiting couple households (12.5%) than the borough wide proportion of 9.8%. There is a lower proportion of married / civil partnership households (17.3%) than the borough proportion of 20.2%. The proportion of one person households of over 65 is less than the borough profile (probably reflecting the larger proportion of younger people).

There is a significantly higher proportion of 'Other households' including full time students where the proportion (7.2%) is noticeably higher than the borough profile of 2.4%.

Assessment of the potential benefits and impacts

Whilst a Neighbourhood Plan has been produced which supports development in the Camley Street area with supporting community and social infrastructure, in the wider SPD area there will be some concerns about the impacts of major developments where often local communities do not see any benefits for them. This includes whether housing will be affordable, whether new job opportunities will be accessible for local people and the disturbance caused by construction. The local communities of the Canalside to Camley Street area will be no exception, and as there is growth in the area and wider area, the SPD helps to support the Council policies and strategies seeking to make growth more inclusive, and create social value and more opportunities and

benefits for local communities including groups with protected characteristics, whilst also assisting in identifying ways the potential impacts identified through consultation can be mitigated.

Local communities were encouraged and provided with opportunities to get involved in the preparation of the SPD which helped to ensure that everyone who could be affected by development has their say and a sense of ownership in the future of the area. This in turn should encourage and instill confidence for local communities particularly seldom heard groups many of whom will have protected characteristics to get involved in development proposals that come forward.

Consultation on this draft SPD was originally planned to start in March 2020 with planned public “drop-in” events and a display in Pancras Square Library, but was postponed due to the impacts of the coronavirus (Covid-19).

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

Officers were available by telephone or email to talk to local people to answer questions and resolve any access and communication barriers including language. Information could also be interpreted upon request.

The SPD focusses on three main objectives and in broad terms should have positive benefits:

- Realising the potential of the area-to make more effective use of land to meet housing needs and enhance the employment role of the area in high quality developments
- Improving connectivity-to make the area, sites and developments more inclusive and accessible and make it easier to get around
- Improving spaces for people- to create and improve public spaces such as open spaces, walking/cycling routes and the public realm as part of, and adjacent to, new developments

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

- The guidance seeks high quality and well designed development that is inclusive and accessible to all and takes into account the more specific needs of younger and older age groups, people with disabilities and mobility issues and lone parents who may spend more time in the area eg. in terms of access to adequate open spaces and enhancing perceptions of safety through good design, more activities and uses aiding surveillance and overlooking throughout the day
- Community safety/perception of safety and access to safe spaces and facilities is also likely to be a particular concern for most groups and needs to be considered in the design of development proposals and related public realm enhancements
- Improved accessibility to new uses and better routes for walking will also benefit groups with protected characteristics who may rely on and use local community facilities and services more than the general population e.g. health services and community centres



Notes to Question 2

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

Question 3

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

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

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

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

The SPD provides guidance based on three overarching objectives with sub-objectives summarised below:

Key Objective: Realise the Potential

- Make the area a more distinctive and identifiable place that evolves successfully in its own right alongside Camden Town and Central London, and sees benefits from sustainable growth and change in the wider area
- See the more efficient, effective, better designed and sustainable use of land with a richer mix of uses serving a diverse residential, working and visiting population
- Create an ambitious mixed-use neighbourhood that connects and integrates well with surrounding neighbourhoods; economically, socially and environmentally
- Increase the residential role of the area by supporting a significant number of new homes and a range of housing types, particularly genuinely affordable homes
- Maintain and enhance the employment role of the area as a place to do business and have access to a range of job opportunities
- Create a more vibrant and safe place

How will the protected groups be affected by these objectives?

In general these objectives are likely to have a positive impact for local people in the Canalside to Camley Street area and future residents, employees and visitors including groups with protected characteristics.

Making the area a distinct and identifiable place that is well designed with a mix of uses could help improve the overall experience and relationship local people have with the area and each other. This could subsequently contribute towards improving the health and well-being, social integration and social cohesion with existing and new communities.

Creating an ambitious and sustainable mixed-use neighbourhood and adding to the connectivity and the physical and social infrastructure can contribute towards making the area more active, vibrant, interesting and feel safer for existing and new communities including groups with protected characteristics.

In addition providing new and improved access to local shops, services and facilities will further help to define the area's identity and ability to serve local people who will potentially have the goods and services they need closer to their homes or place of work or have easier physical access to them.

The SPD reflects the policies that support provision of more employment spaces including a mix of affordable and smaller spaces suitable for SME and start-ups. This should provide more access to jobs and training for local people who are economically active (and potentially those who are currently economically inactive such as students or people who have retired) and more opportunities for local people to start and / or run their own business locally.

More job and training opportunities will especially benefit local young people aged 16 to 24 who nationally are more than twice as likely to be unemployed as all other age groups combined (Institute of Employment Studies) and are most likely to have lost work or seen their income drop because of COVID-19 (research by Resolution Foundation).

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

Increasing the residential role of the area by supporting a significant number of new homes and a range of housing types, particularly genuinely affordable homes will help to ensure the area maintains and supports a diverse mix of residents and is a place for everyone including groups with protected characteristics.

New homes will need to be built to nationally described space standards or greater and made accessible and adaptable with suitable numbers of wheelchair user dwellings to meet Building Regulations and planning requirements. The SPD supports policies that encourages housing to meet the needs of specific groups as part of a mix of housing, eg supported accommodation or key worker housing. Providing new housing will create more opportunities for more affordable and suitably sized housing for the many families in Camden who are currently in overcrowded and/or in temporary accommodation and will have a positive impact on the quality of life for new residents.

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

It is considered that these objectives will overall benefit those living, working and visiting the neighbourhood including groups of people with protected characteristics. There are not considered to be any disproportional impacts, direct or indirect discrimination as a result of these objectives.

Key Objective: Make Connections

- Make the area more pleasant for walking/and cycling connecting areas and activities and integrating the area better with surrounding neighbourhoods.
- Create safe, well-overlooked, attractively designed streets and spaces for residents and visitors, pedestrians and cyclists
- Ensure site development designs and layouts add to permeability and where feasible allows for potential future connections to be established.
- Improve accessibility and routes to neighbourhood facilities and public transport networks

- Improve perceptions of community safety and reduce opportunities for crime and anti-social behaviour.

How will the protected groups be affected by these objectives?

In general these objectives are likely to have a positive impact for local people in the Canalside to Camley Street area and future residents, employees and visitors including groups with protected characteristics.

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

Making the environment feel safer through design, including having well defined streets and improving perceptions of community safety has the potential to greatly improve the mental health and well-being for existing and new communities. This is especially beneficial to people who may feel most vulnerable including older people, LGBT+, people with disabilities, women, parents with young and teenage children, and young people who can especially feel unsafe in some areas of London. Improving perceptions of community safety can also act to deter crimes of opportunity and anti-social behaviour in the area. Reducing the risks of crime can help to make communities including groups with protected characteristics feel safer and more at ease within their environment.

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

Designing and delivering new homes and workspaces that will increase activity with passive surveillance will potentially bring more life and diversity into the area, utilise underused spaces, reduce perceptions of community safety (as outlined earlier in this section) and make the area feel safer all of which will have a positive impact to the health and well-being of local people including groups with protected characteristics.

The potential Camden High Line would transform a disused railway into a sustainable green space and transport link. This could create another opportunity for everyone to enjoy the outdoors, which could potentially improve the health and well-being for new and existing communities including groups with protected characteristics. More specifically, having more opportunities to be outdoors will help to tackle inactivity, isolation and improve the mental health of groups with protected characteristics including older people, people with a disability or a long term illness, young children and parents with young children who proportionally are more likely to be in the area during the day.

Ensuring site development designs and layouts are permeable and allows for potential future connections will encourage ease of movement throughout the area and to connecting areas for existing and new communities, into the future. This will provide further opportunities for local communities to mix and encourage social integration and cohesion.

To support existing environmental policies car use will be deterred by requiring new development to be car-free which may have an impact on some groups with protected characteristics who may have specific mobility issues.

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

It is considered that these objectives will overall benefit those living, working and visiting the neighbourhood including groups of people with protected characteristics. There are not considered to be any disproportional impacts, direct or indirect discrimination as a result of these objectives.

Key Objective: Better Places for People

- Maximise and enhance the multiple benefits of green infrastructure in the area to develop a higher quality, inclusive and accessible green environment.
- Integrate green infrastructure into new development in a range of forms to contribute to environmental quality (biodiversity, sustainable drainage, improved air quality and energy infrastructure)
- Provide a variety of types and scale of improved and new public and private spaces with clear management strategies to support sustainable and healthy communities, economic growth and address any deficits in local open space
- Creatively enhance the existing public realm, spaces and routes to create a stronger, safer and more identifiable place; from the canal to open spaces; from streets to bridges
- Improve the living, pedestrian and cyclist experience through greening and associated measures to alleviate air and noise pollution.
- Preserve and enhance the biodiversity roles of the canal, other INC sites and existing open spaces.

How will the protected groups be affected by these objectives?

In general these objectives are likely to have a positive impact for local people in the Canalside to Camley Street area and future residents, employees and visitors including groups with protected characteristics.

Protecting and developing a higher quality, inclusive and accessible green environment will provide more opportunities for local communities to spend time outdoors and engage with the variety of public spaces and places (including places with biodiversity) available. This can help to tackle inactivity, isolation, improve the physical health, mental health and well-being for existing and new communities including groups of people with protected characteristics. Providing more opportunities to spend time outdoors locally will especially have a positive impact for groups who risk being more isolated including older people and people with a long term illness or disability.

Integrating green infrastructure into new development in a range of forms will bring a variety of spaces and potential outdoor activities to the doorsteps of new and existing communities, which in turn will encourage more usage and assist in improving the physical health, mental health and well-being for local people including groups of people with protected characteristics. Integrating recreation and play into design can encourage more outdoor activity within developments and can ensure children have safe places to play with their guardians close by. This can encourage local people to engage more with the variety of uses within their developments, improve the social integration, social cohesion and have a positive impact on the health and well-being for local people.

Ensuring existing and new spaces are well overlooked will make the area feel safer (as outlined previously), and also provide opportunities for local people who risk being more isolated including older people and people with a long term illness or disability to see and engage with the surrounding local communities from their homes including outdoor space within their homes.

Camden's Climate Action Plan and clean Air Action Plan aim to improve the sustainability of development and move towards zero carbon developments by 2030 and improve air quality in the borough, issues raised in consultations across the borough. In addition, noise pollution can greatly affect local people's health and well-being as well as the local biodiversity. Providing measures to alleviate air and noise pollution will greatly enhance the health and well-being for existing and new

communities particularly people who are likely to be in the area throughout the day. This will include parents with young children, people with a disability or long term illness, older and economically inactive people.

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

It is considered that these objectives will overall benefit those living, working and visiting the neighbourhood including groups of people with protected characteristics. There are not considered to be any disproportional impacts, direct or indirect discrimination as a result of these objectives.

Notes to Question 3

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

Question 4

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

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

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

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

However, whilst the SPD does not create policies for the development and use of land, new developments may have an impact on existing uses and occupiers which may need to be suitably accommodated or relocate, and these impacts will need to be assessed and addressed in considering proposals as they come forward.

The objectives to retain and reinforce the employment role of the area will still seek satisfactory replacement of business spaces of different types and different affordability levels. The Councils' policies related to employment floorspace also seeks measures to be put in place so that new workspace and businesses can offer training and employment opportunities for local people including apprenticeships in construction and permanent jobs in those new workspaces. The extent of effects will also be dependent on the nature of the businesses involved and their individual role in employing local people and in supporting people with protected characteristics, which would need to be considered as schemes come forward.

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

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

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

Notes to Question 4

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

Question 5

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

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

The revised SPD has given greater emphasis to the principles of good growth that has real social value and inclusive economic benefits; where the diverse employment role of the area is maintained and even enhanced, where a mix of types and size of businesses and workspaces offers a range of training and job opportunities for local people and where major housing development includes genuinely affordable homes of different sizes. Good growth should also help make places more accessible, connected and healthier; where streets and routes are improved to make walking and cycling safer and more pleasant; making existing and new local shops, services and facilities easier to reach; and where new open spaces are created are inclusive to all with much needed space to relax and exercise, adding to the biodiversity and green infrastructure networks of this urban area.

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

The consultation on the draft SPD gave local people, groups and organisations an opportunity to provide a range of views and the chance to identify other potential issues and potential impacts arising from the guidance and its objectives, some of which may be competing/conflicting or maybe include things that an SPD cannot directly address because it is beyond its scope or statutory purpose. These were considered in revising the SPD to ensure that no group is unduly disadvantaged by the guidance. It is considered that no part of the SPD discriminates unlawfully.

Notes to Question 5

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

Examples

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

EquIA prepared by: George McKenzie

Date: 30th June 2020 (and reviewed/updated in October 2021)

EquIA checked by: David Morrissey

Date: 10th November 2021

EquIA approved by: Richard Wilson

Date: 10th November 2021

(Relevant Director Sponsor)

What to do upon approval

For organizational change: If your EQUIA relates to internal staff, please send to your HR Business Adviser.

For all other EQUIAs: Please upload onto SharePoint via this link:
<http://teams.lbcamden.net/projects/equality/Pages/Home.aspx>

Explanatory Notes

What is our Public Sector Equality Duty (PSED)?

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

1. Eliminate discrimination, harassment and victimisation and other conduct prohibited under the Act; EqA 2010 (section 149(1)(a)).
2. To advance equality of opportunity between people who share a relevant protected characteristic and those who don't; This involves having due regard to the need to:
 - o remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
 - o take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it (section 149(4)); and
 - o encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

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

(Section 149(3), EqA 2010.)

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

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

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

What do we mean by “due regard”?

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

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

Lord Justice Dyson

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