



# Gospel Oak and Haverstock Community Vision Supplementary Planning Document

## Equality Impact Assessment

# Equalities Impact Assessment

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Camden Council

## What is an Equality Impact Assessment?

An Equality Impact Assessment (“EqIA”) 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 EqIA should also address issues of advancing opportunities and fostering good relations between different groups in the community.

Name of proposed policy guidance being reviewed:

**Gospel Oak and Haverstock Community Vision planning framework**

## Explanatory Notes

### What is our Public Sector Equality Duty (PSED)

Under section 149 of the Equality Act 2010 (the Act/ EqA 2010) 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 (s149(1)(a));
2. Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it (s149(1)(b)); 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(3), EqA 2010.)**
3. Foster good relations between persons who share a relevant protected characteristic and persons who do not share it (section 149(1)(c)). This involves having due regard, in particular, to the need to tackle prejudice and promote understanding (section 149(5), EqA 2010).

**Section 149(6)** makes it clear that compliance with the duties 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 Act (this includes breach of an equality clause or rule or breach of a non-discrimination rule (section 149(8)).

**Section 146(4)** states that the steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take into account of disabled persons' disabilities.

**Under the Duty the relevant protected characteristics are: Age, Disability, Gender reassignment, Pregnancy and maternity, Race, Religion or belief, 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. Under s29 of

the Act a person (a “service-provider”) concerned with the provision of a service to the public or a section of the public (for payment or not) must not discriminate against a person requiring the service by not providing the person with the service. In addition, a person must not, in the exercise of a public function that is not the provision of a service to the public or section of the public, do anything that constitutes discrimination, harassment or victimisation.

- 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 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 EIA. 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 mitigated before the adoption of a proposed policy or decision has been taken
- Officers reporting to or advising decision makers must not merely tell the decision maker what he/she wants to hear but need to be “rigorous in both enquiring and reporting to them”
- The duty should be reconsidered if new information comes to light

“

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

**Lord Justice Dyson**

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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**

## Section 1 - WHAT IS BEING ANALYSED?

### 1. What is changing and why?

- 1.1. The Council's adopted Local Plan sets out the Council's planning policies covering the period from 2017 – 2031. The Local Plan identifies the Gospel Oak area as a Community Investment Programme (CIP) regeneration area and area of expected growth.
- 1.2. Gospel Oak, is a predominately residential area comprised of six core estates in the north of the borough. It has been identified as a priority area due to high levels of relative deprivation and significant housing challenges. Poor quality design, overcrowding and the age of buildings means that much of the housing stock is in need of significant investment in order to meet the Decent Homes Standard. Haverstock ward is similarly residential in character and also features a number of larger housing estates which face many of the same issues. The neighbourhood is also close to the identified Kentish Town growth area, for which another planning framework has been adopted.
- 1.3. In conjunction with the community, the Council has prepared a draft Community Vision document for a wider Gospel Oak and Haverstock area. This would be a planning framework for the area, and be adopted as a Supplementary Planning Document (SPD), which will set out the overarching principles for regeneration and guide investment into the area over the short, medium and long-term. This framework and guidance will supplement the existing Local Plan and does not create new policy or allocate sites, though it will set out more guidance on how Local Plan policies should be implemented in this area.
- 1.4. The guidance is based on Council policies in the adopted Local Plan as well as the adopted Site Allocations Plan which were each subject of Equalities Impact Assessments (EqIA). In addition, regeneration across the area will be mostly undertaken through the Councils Community Investment Programme (CIP) and CIP and other Council service decisions on whether to progress with development proposals or other projects are also the subject of separate EqIAs where required.
- 1.5. Proposals in the area will focus primarily on improving the quality of housing stock but also offers the potential to create an improved physical environment and enhanced connectivity as well as address a number of social and economic issues. These will help meet the Local Plan priorities which include:
  - new and improved housing;
  - improved community safety through better street design;
  - greater opportunities for jobs and training;
  - support for local businesses and new enterprises;
  - regeneration of Queen's Crescent through improvements to the street environment and a better mix of market/retail offer;
  - greater legibility throughout the area;
  - better community facilities, that are coordinated and tailored to community needs;
  - new and improved quality open spaces



1.6. Numerous opportunities have been identified to improve local conditions and facilities. The redevelopment of Bacton Low Rise Estate commenced with the completed first phase and Phase 2 due to progress in 2023/24, development at the Maitland Park Estate is nearing completion and a number of new houses built in and around the Kiln Place estate, and a range of options are currently being explored with the local community and residents on other estates. There are a number of other projects that have been consulted on including enhancing Queens Crescent and Talacre Town Green and other transport projects.

1.7. In addition to the Local Plan, there are national, regional and local planning policies that form the context for the guidance in the proposed SPD. These include:

- The National Planning Policy Framework (NPPF) which encourages the creation of healthy places and wellbeing by encouraging developments that promote walking and cycling with significant emphasis on high quality design. The NPPF promotes the effective use of land in meeting the need for more homes and other uses.
- The London Plans policies are underpinned by the “Good Growth” agenda with a strong focus on economic growth, supporting more inclusive and balanced communities and addressing health inequalities. In these areas development proposals should contribute to regeneration by tackling inequalities and the environmental, economic and social barriers that affect the lives of people. The plan’s “Urban Greening” and “Healthy Streets” objectives focus on creating more inclusive and healthier environments and delivering the design quality and patterns of land use and measures, where more trips happen by foot, cycle or public transport.
- Camden’s Site Allocation Plan is being reviewed, which will include policy for a number of key sites within the framework area. Following initial public consultation in 2020 and further consultation in early 2022, further consultation will start in 2022/23.

At the time of its initial preparation it was drafted to support the Camden Plan and Camden 2025 ambitions with particular relevance to homes and housing, strong growth and access to jobs, safe strong and open communities, clean, vibrant and sustainable places, healthy independent lives and open communities. It also reflects and supports our We Make Camden missions and ambitions including making the local economy strong and inclusive, supporting good health and well-being, safe and open communities where everyone can contribute, everyone has a place to call home and where places should be green, clean, vibrant, accessible and sustainable.



Map showing boundary of the SPD area

## 2. What are the decision makers being asked to decide?

2.1. A draft vision document was approved for consultation purposes in October 2021. The relevant Cabinet Member will be asked to decide whether to formally adopt the Gospel Oak and Haverstock Community Vision as a Supplementary Planning Document following the conclusion of the final public consultation process in early 2022. As an adopted Supplementary Planning Document (SPD), the document would become a material consideration in determining planning applications within the framework area. It will not directly deliver development, but will guide proposed development and priorities for investment in the area.

2.2. It is planned that the adoption decision will be made in November 2022.

## 3. Consultation undertaken in advance of this decision

3.1. Extensive consultation has taken place and prior to the formal decision a range of public engagement or consultation activities were undertaken to ensure that the document has been shaped by the local community.

3.2. Before writing the draft Community Vision, we spent time asking and listening to what local people think about their neighbourhood, and how they wish to see it change in the future. A detailed engagement feedback report has been prepared and will also

form part of the adoption papers.

- 3.3. Stage 1 of our programme of engagement ran between October 2020 and August 2021. The earlier months of engagement were almost exclusively online due to Government restrictions around the pandemic, but targeted and direct measures were taken in the latter part to offer a wider range of ways for people to have their say. During this period we heard from 460 residents via a survey and over 200 residents in person. This included “pop up” events in key locations, hosting workshops and attending meetings with specific community and faith organisations, schools and youth clubs as well as support groups. A feedback report was published in September 2021.
- 3.4. In order to complement these discussions with the wider community, a separate advisory body made up of a proportionally representative group of 30 volunteer local residents (in terms of gender, housing tenure, ethnicity and age) was also formed. This Neighbourhood Assembly was convened at regular points and provided another method in gaining feedback from a diverse cross section of the local community. The group met over seven sessions and two further optional workshops throughout the programme to examine issues and opportunities and help shape the Vision. The assembly was presented engagement materials and asked for feedback in a similar way to the wider community, however, the format of the meetings provided a platform for more in-depth deliberation on some of the key priorities. A report on the recommendations was published. This feedback was used alongside the feedback from the wider community to form the draft of the Community Vision.
- 3.5. Stage 2 of the programme of engagement ran between November 2021 and January 2022 involving formal public consultation on the draft Community Vision itself. This asked for feedback from the community on the content of sections of the document and whether it effectively sets out a satisfactory response to addressing the local priorities identified. As well as a dedicated website with feedback questionnaire, this stage also included public meetings/exhibitions, as well as further discussions and meetings with key stakeholder groups. The feedback collected from this stage was then used to refine and update the framework before its formal adoption.

#### **4. What are the main aims?**

- 4.1. Its main aim is to deliver on meeting the priorities previously identified by the local community and also reflected in the Local Plan. Once adopted, the planning framework will act to provide a vision for the regeneration of the neighbourhood, providing principles and objectives and guiding the development of various individual development sites within it, as well as identifying priorities for other improvements in the area.
- 4.2. It does not create new policies, but seeks to set out in more detail how policies in the Local Plan and other relevant policies might be implemented. The guidance is based on Council policies in the adopted Local Plan which was itself subject of an Equalities Impact Assessment (EqIA) which identified that the plan would have broadly positive impacts.
- 4.3. The SPD provides area based guidance grounded on adopted policies and priorities and does not in itself authorise or action development proposals and improvements to take place in the area. It will be a guide for planning, decision-making and investment alongside other plans and policies if development proposals or projects come forward.



## **5. How will the changes affect people?**

5.1. The planning framework is a guide for planning and growth if development were to occur. Depending on the nature and scale of those development proposals or other projects these will have their own consultations and require more detailed assessments of their impacts socially, economically and environmentally.

5.2. The planning framework aims to protect and promote diverse and sustainable communities and well planned and designed housing-led development that addresses current housing conditions and needs. It aims to give assurances about the importance of retaining and enhancing community facilities and services, green spaces and other important social infrastructure. Within the guidance six principles for future change have been identified, on which the vision for the area, its objectives as well as investment priorities have been based:

- **Delivering the homes we need**
- **A strong and inclusive community**
- **A healthy and safe neighbourhood**
- **Making the best use of land**
- **An inclusive economy**
- **Creating a sustainable and resilient neighbourhood**

5.3. It contains a broad range of guidance and overall the SPD should be positive in terms of its potential impacts in guiding future development and associated improvements and investment.

## Section 2: PLANNING YOUR EQUALITY ANALYSIS

**Question 2: Do those from protected groups benefit or will they experience specific and disproportionate impacts? Will there be any direct or indirect discrimination?**

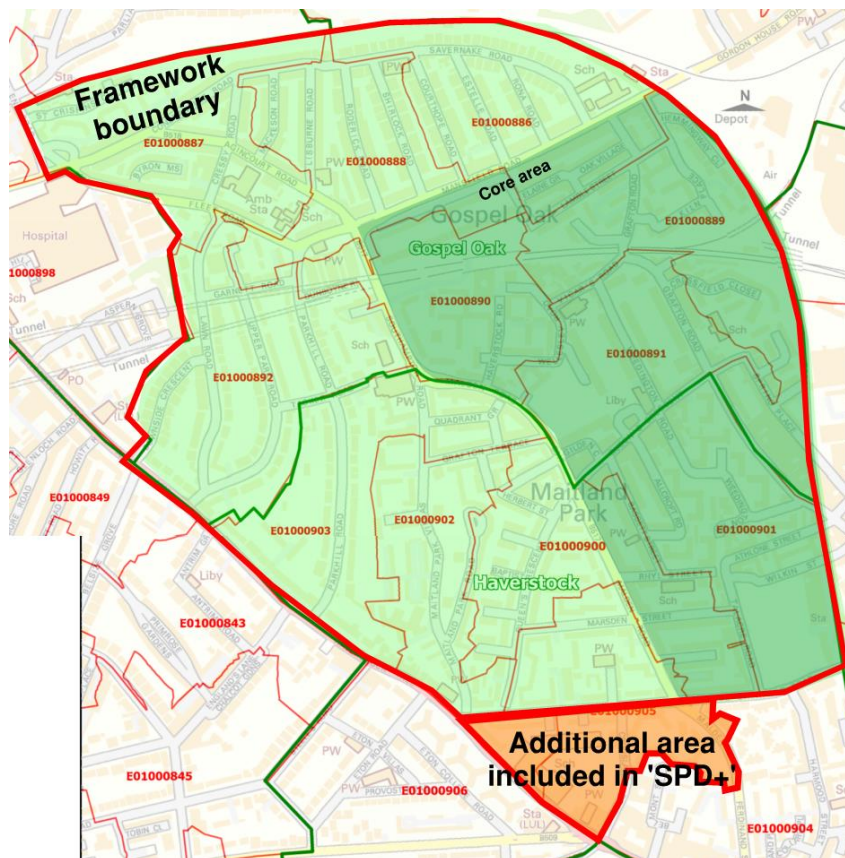
### 1. Context

- 1.1. 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 lack of play space, poor accessibility, quality of open spaces and may have more concerns about personal safety.
- 1.2. New development may also have both negative and positive impacts through the loss, replacement or delivery of community facilities, open spaces or types of new housing and their size, design and affordability.
- 1.3. Where development is expected to lead to an increase in an area's population or have implications for local infrastructure, s106 planning obligations can be secured to mitigate the impacts of development and possible additional demands on local services or facilities. This can lead to benefits for the existing local community in the provision or enhancement of new open space or facilities. 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. The adoption of the SPD will be particularly relevant to existing and future communities of the Gospel Oak and Haverstock area which is primarily residential in nature.
- 1.4. Most of the data in this EqIA is from the last Census carried out in 2011. Since the Census was conducted the Indices of Deprivation and GLA based population projections (by borough and ward) have been published with the latter indicating projected population growth in the area, though this is challenged by the initial population data emerging from the 2021 Census. Updated data for certain metrics is available for mid-2020 (such as age and gender). The latest Census data will be published in stages starting from spring 2022, though the full data set is not expected to be published until 2023.
- 1.5. A principle aspect of this EqIA is to have an understanding of the proportions of residents with protected characteristics and who could potentially be affected and a good indication of this can still be achieved using the last Census data, even as the population changes (and population projections are also subject to change).

### 2. The framework area

- 2.1. The area identified for the Community Vision included the whole of the Gospel Oak ward (prior to boundary changes) and approximately half of the Haverstock ward as this is the area centred around the Queen's Crescent neighbourhood centre, which contains shops and businesses and local facilities and services, such as the library, GPs and faith and community groups, relied upon by residents of this neighbourhood. The area boundary is broadly an area within a 15 minute walk from this neighbourhood centre.

- 2.2. It is also characterised by a high proportion of housing estates of varying quality and states of repair. The areas of Haverstock ward that are not included within the framework area are more akin to the Chalk Farm / Camden Town neighbourhood, are more physically separated and include a higher proportion of owner occupied single family dwellings which do not experience the same issues in need of regeneration or investment.
- 2.3. In addition to the framework boundary, a 'core area' has also been identified. Whilst the Community Vision will apply across the framework area, this core has been identified as it contains the majority of estates land that fall within the CIP and therefore is the area with the greatest potential for change. The outer areas are included though as the Community Vision identifies a number of investment opportunities of importance (such as new or improved cycling routes) in the outer areas that will be beneficial for the entire neighbourhood.
- 2.4. The decision to focus the Community Vision on this area was tested during initial public engagement, where a specific question relating to the boundary extent was included. Public consultation responses to the question "is the Community Vision focusing on the right areas?" received overall support.
- 2.5. As the framework boundary does not align fully with ward level boundaries, Lower Super Output Areas (LSOAs), upon which Census data is collated, are used wherever possible to give a more accurate picture. The combination of LSOAs that most closely correspond with the SPD area have been used to obtain demographic statistics for this EquIA and is slightly larger than the SPD area alone and is therefore referred to as SPD Area+. The comparison between the framework boundary and the boundary of the combined LSOAs is shown below.



Map showing Boundary of SPD compared with ONS Lower Super Output Areas



LSOAs included in SPD+ area:

**GOSPEL OAK**

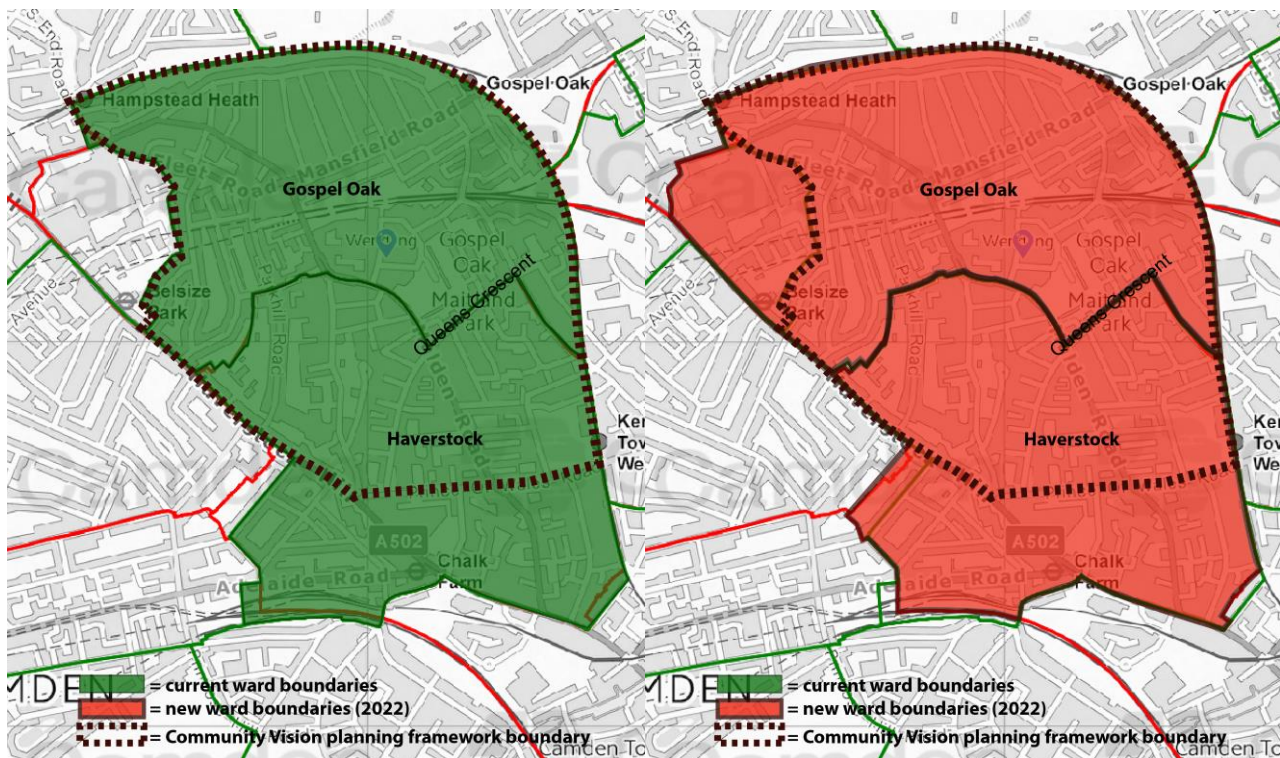
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2.6. The framework area is approximately 108 hectares. The SPD+ area is approximately 113 hectares. Where data is not available at LSOA level, ward level or other information has been used.

2.7. As set out in the previous section, the planning framework boundary was not bound by the old or new administrative ward boundaries. However, for the purpose of thoroughness the proposed changes to the ward boundaries and a comparison to the planning framework area are shown below.



Maps showing boundary of SPD area compared with old (green) and new (red) ward boundaries

2.8. As shown, the main area of change in the ward boundaries was the addition to Gospel Oak ward of the area just north of Belsize Park Station including the extensive Royal Free Hospital site but this is not included within the area covered.



## Demographic information for the neighbourhood

### 3. Population

3.1. Census data shows us that in 2011, Camden had a residential population of 220,300 and an average population density of 101.1 persons per hectare (noting that this is affected by the inclusion of parks such as Hampstead Heath within the borough boundary). Gospel Oak ward had a population of 11,264 and an average density of 163 (4<sup>th</sup> highest Camden ward) and Haverstock had a population of 12,364 and a density of 168.9 persons per hectare (3<sup>rd</sup> highest Camden ward).

Measure for area	Camden, 2021	Camden, 2011	London, 2021	London, 2011	England & Wales, 2021
Census estimate of usual residents	210,100	220,300	8,799,800	8,173,900	59,597,300
Census count of usual residents	199,800	191,500	8,378,700	7,391,900	57,788,000
Response rate for usual residents	95%	87%	95%	90%	97%
Estimate of households occupied by at least one usual resident	92,800	97,500	3,423,800	3,266,200	24,782,800
Council Tax occupied households	99,500	-	3,593,700	-	25,437,500
Census estimate of usual residents	210,100	220,300	8,799,800	8,173,900	59,597,300
Count of usual residents	199,800	191,500	8,378,700	7,391,900	57,788,000
Adjustment for undercoverage in households	10,500	-	470,200	-	2,137,500
Adjustment for overcount in households	-2,200	-	-81,700	-	-596,200
Adjustment for undercoverage in communal establishments	1,700	-	24,100	-	221,800
Other local adjustments	300	-	8,700	-	46,300

3.2. Since the time of the last Census, the local demographic landscape has changed and continues to evolve. Some developments have already come forward within the SPD+ area, such as at Bacton Low Rise Phase 1, which will have affected its population, but perhaps only marginally as estate schemes involve replacement housing for existing tenants, however, the mid-2020 data available shown in the table below takes these into account in its projections.

Camden population (all mid-2020)	279,516
Gospel Oak ward population	13,662
Haverstock ward population	15,326
Combined	28,988
<b>SPD+ area population (all ages)</b>	<b>24,422</b>

Mid-2020 population estimates, ONS 2021

3.3. These projections indicated that the population of Camden had been calculated to increase by 26.9% between 2011 and 2020. Proportionately, the two wards fall slightly behind this trend, with projected average population increases of 21.3% in Gospel Oak

and 24% in Haverstock over the same period.

### **Predicted population change**

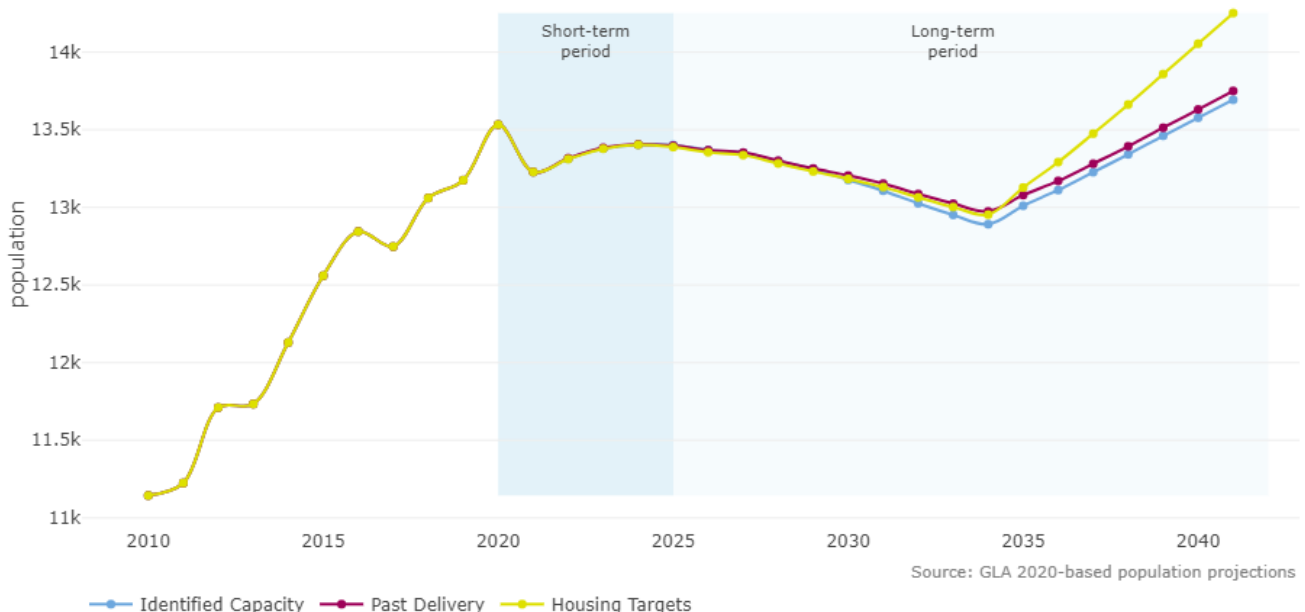
3.4. In 2021, the GLA updated their housing-led population projections available at ward level. These ‘2019-based Projections’ forecast Camden’s population in line with planned residential development. These forecasts are used by Camden to underpin council strategies and in planning services. They reconcile future population growth with available housing supply by incorporating a housing supply trajectory based on three scenarios. Based on scenario three (housing targets), the projected population change is shown in the table below:

<b>Projected population</b>	<b>2020</b>	<b>2021</b>	<b>2031</b>	<b>2041</b>
Camden	279,516	273,371	293,653	311,399
Gospel Oak	13,662	13,227	13,134	14,248
Haverstock	15,326	14,867	14,852	14,702

Mid-2020 population projections, GLA 2021 (scenario three)

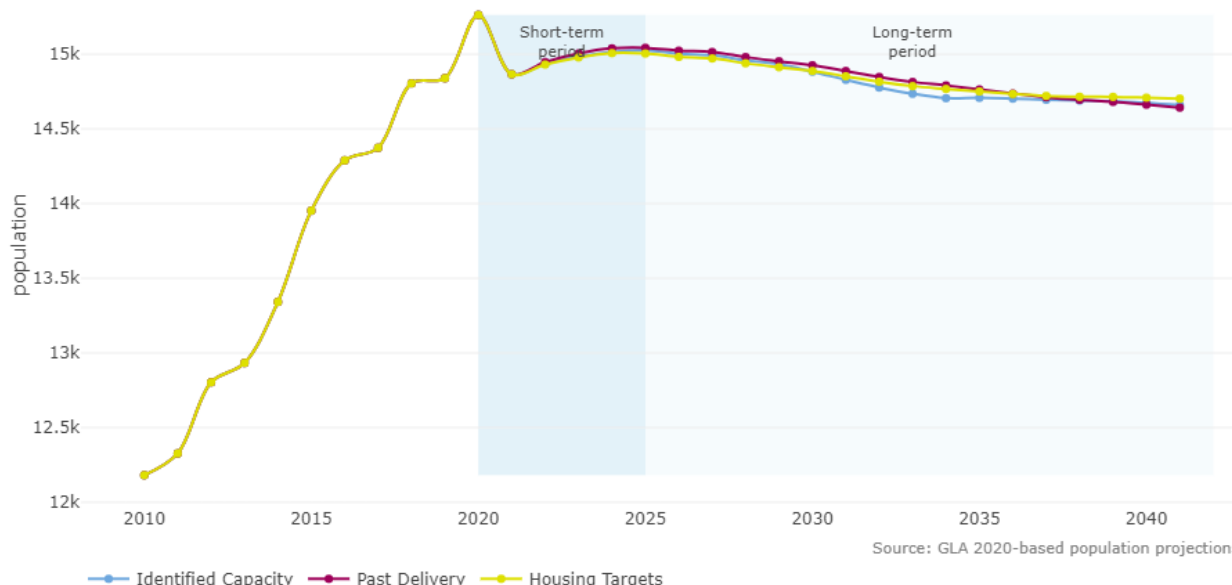
3.5. This projection estimated the population of Camden to drop by -6,143 between 2020 and 2021 before returning to a pattern of slow growth. Following this projected drop, the population of Camden is not expected to return to 2020 levels until 2024. This same trend is projected for the rest of London as a whole, where a drop of -86,507 expected in 12 months between 2020 and 2021 before returning to a trend of slow net growth. In Gospel Oak, the population is not projected to rise back above the 2020 level until 2035. In Haverstock the population is not projected to rise back above the 2020 level and is expected to continue to decline at a slow rate from 2026 onwards. These trends for both Gospel Oak and Haverstock wards are shown on the figures below.

Figure 1: Total Population: Gospel Oak



Gospel Oak population projection

Figure 1: Total Population: Haverstock



Haverstock population projection

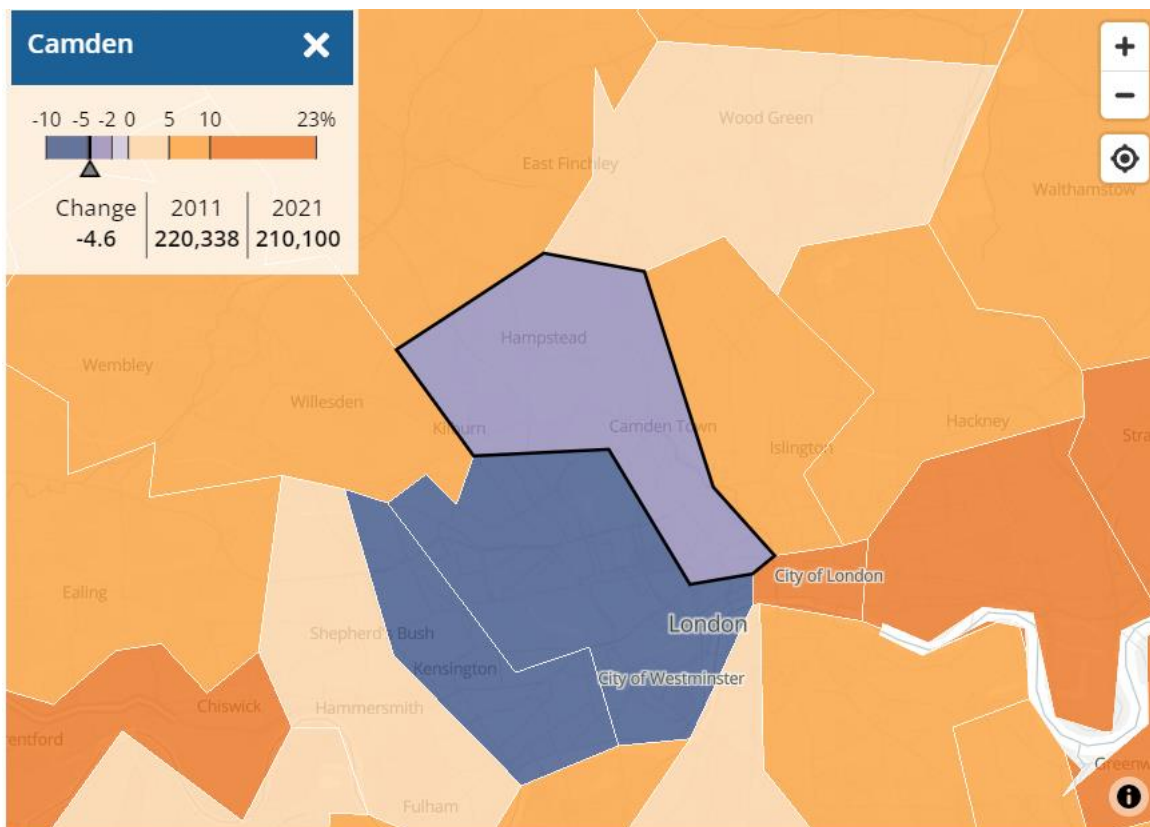
3.6. The population projections above take account of projected ‘components of change’, which include births, deaths and migration rates. This includes actual data from the period of 2011-2019 (taken from ONS outputs) combined with modelled data from 2020 onwards (GLA). To contextualise the trends in the figures above, a range of data for both wards is set out in the table below.

Components of change		2020	2021	2031	2041
Gospel Oak	Births	122	117	92	113
	Deaths	-92	-88	-85	-99
	Migration	+328	-334	-59	+184
Haverstock	Births	137	134	118	119
	Deaths	-96	-94	-87	-98
	Migration	+383	-437	-67	-27

2020 population projections, GLA 2021 (scenario three)

3.7. As the table shows, the overall population trends for both wards are predominately the result of projected net losses from migration combined with general declining birth rates as well as a relatively constant rates of death.

3.8. However, whilst ward level 2021 Census data hasn’t yet been released the initial 2021 data for Camden as a whole indicates the population size has decreased by 4.6%, from 220,300 in 2011 to 210,100 in 2021.



Source: Office for National Statistics - Census 2021

### Housing tenure

3.9. Due to the nature of the area being defined by a number of large Council owned housing estates, the average proportion of housing tenure within the framework (SPD+) area is heavily weighted towards social rent, at much higher rates than the Camden average, as shown in the table below of key 2011 census data.

Tenure type	Percentage of SPD+ area population	Camden average
Owner occupied	27.6%	33%
Shared ownership	0.9%	<1%
Private rent	20.2%	32%
Social rent	50.0%	33%
Living rent free	1.3%	<1%

Housing tenure, Census 2011

As set out earlier, the area is one of stark contrasts and this is also true of housing tenure. Although on average 50% of all households live in socially rented accommodation, in some LSOAs this percentage is as high as 82.8% (E01000890). Similarly, levels of home ownership vary greatly across the area, ranging up to 54.8% in the area with highest ownership (E01000886 – the area to the north of Mansfield Road) down to the lowest rate at 8.7% (for both E01000890 & E01000905).

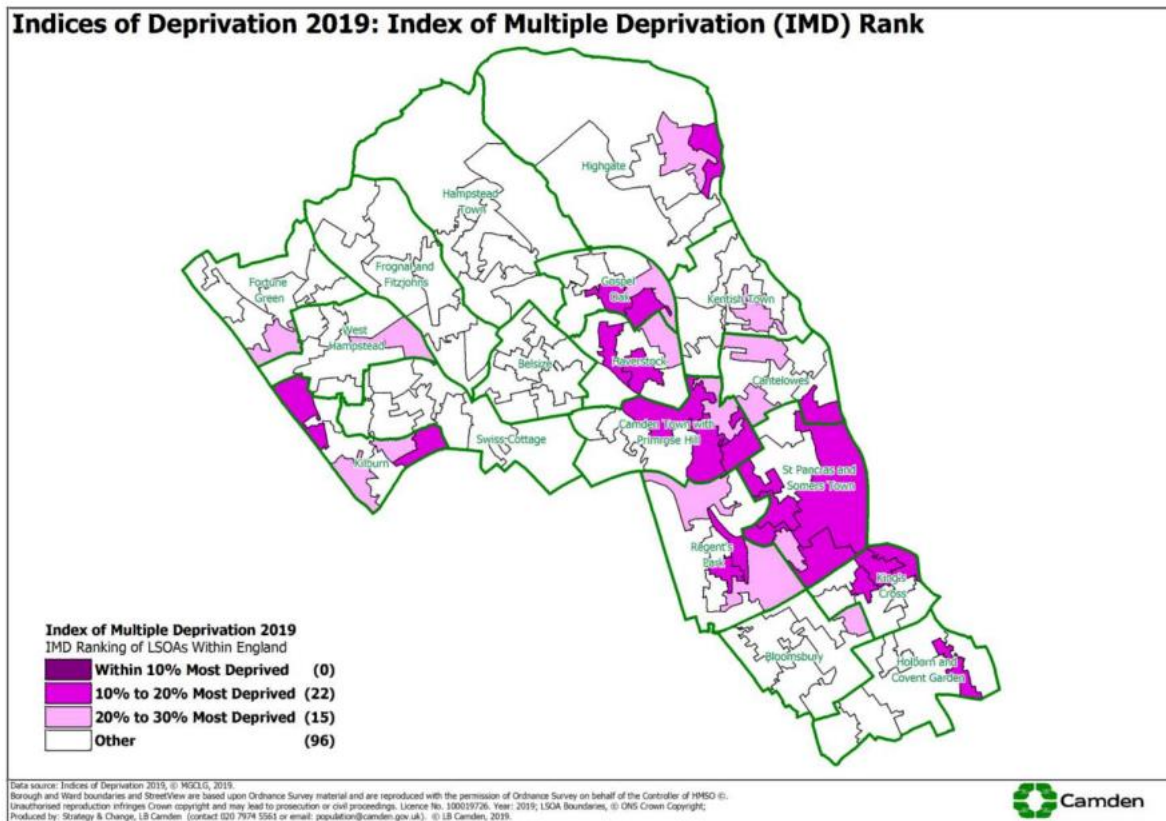
### **4. Index of multiple deprivation**

4.1. The Indices of Deprivation 2019 provides a set of relative measures of deprivation for small areas (Lower Super Output Areas - LSOAs) across England. The areas of deprivation measured include income, employment, education, skills and training, health



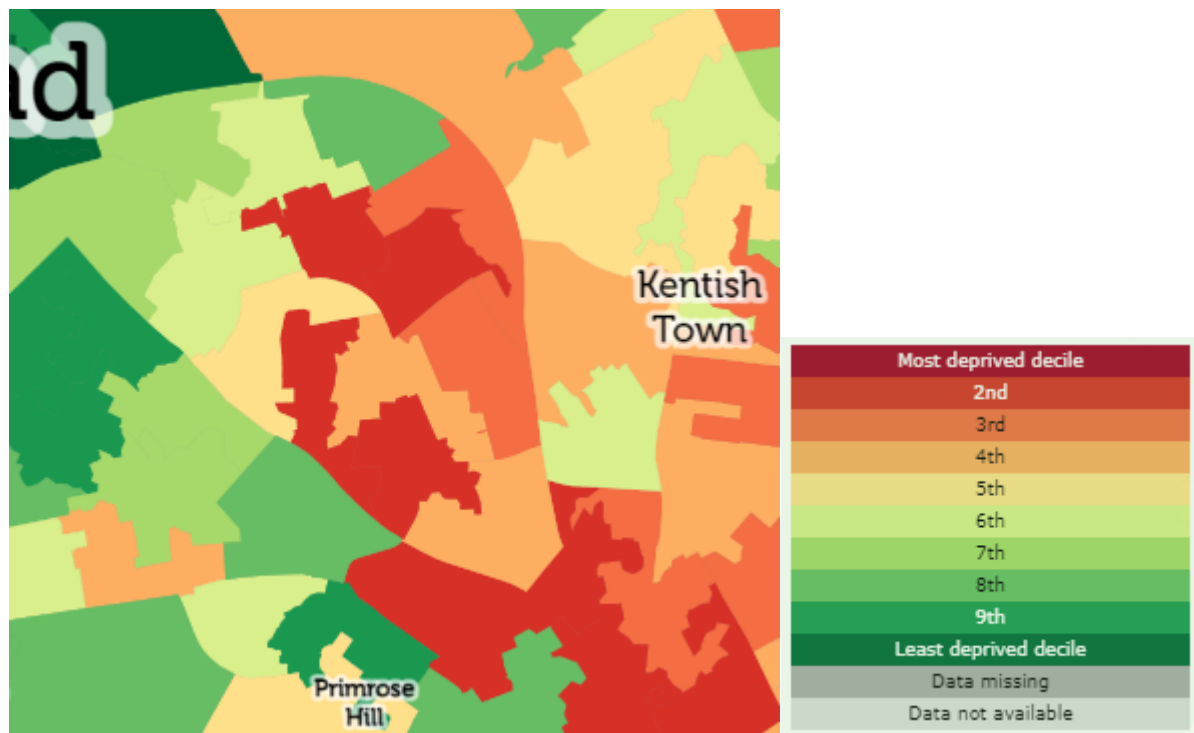
and disability, crime, barriers to housing and services and living environment deprivation.

**Figure 4. Index of Multiple Deprivation (IMD) 2019 – Most deprived LSOAs in Camden**



Source: English Indices of Deprivation 2019, © MHCLG, 2019.

4.2. Across both wards, 3 LSOAs rank within the top 15% most deprived in England and 4 rank within the top 20% by index of multiple deprivation (IMD). The figures below show LSOAs for the area ranked by decile against all LSOAs in England.

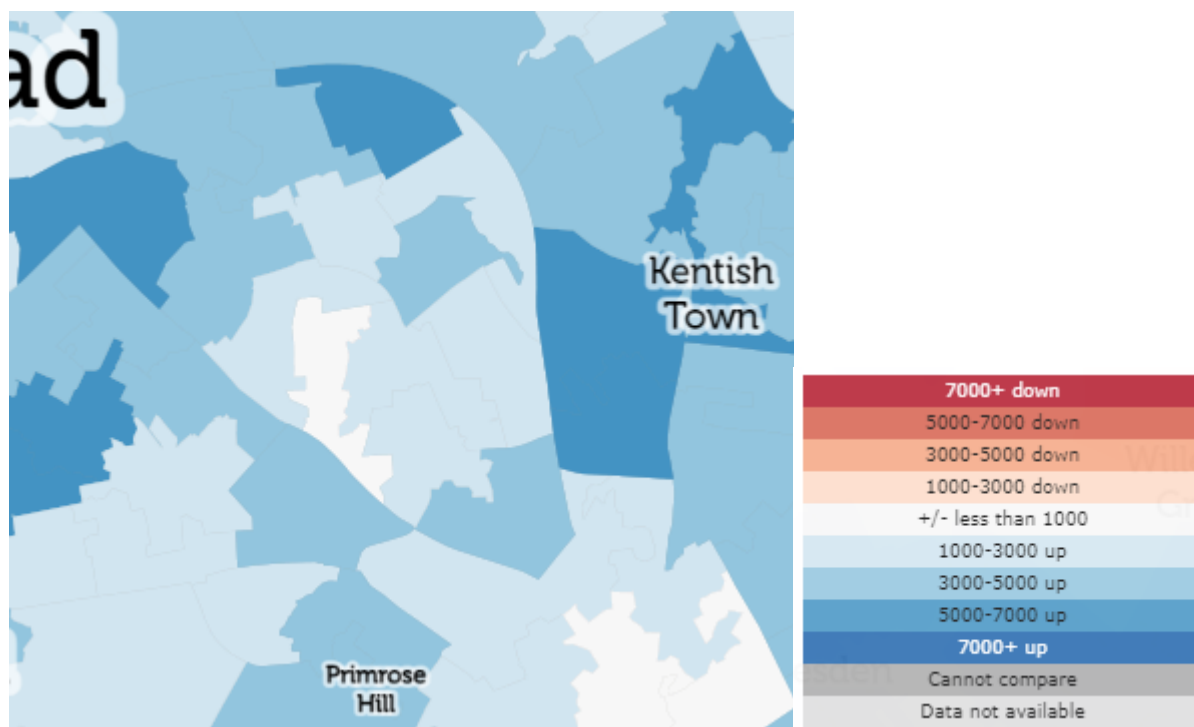


Indices of Deprivation 2019: Index of Multiple Deprivation (IMD) Rank (ONS 2019)

4.3. The most deprived LSOA in the Gospel Oak is the area between Mansfield Road and Malden Road (E01000890), which includes the social housing within the Wendling and Bacton Low Rise estates and is in the top 13% of most deprived in England and is the most deprived LSOA in Camden. This has an IMD score of 40.88. The second most deprived LSOA within the Gospel Oak ward is the area between Queen’s Crescent and Vicar’s Road which includes social housing within Gospel Oak 7 & 8 (E01000891), which ranks within the top 15% most deprived in England and the 6<sup>th</sup> most deprived in Camden. This has an index of multiple IMD score of 38.28. Conversely, the area around Gospel Oak School to the north of Mansfield Road is the least deprived LSOA in the ward (E01000886), ranking 110<sup>th</sup> (out of 133) within Camden for most deprived. This has an IMD score of 9.13.

4.4. In Haverstock ward, the most deprived LSOA includes the area around Marsden Street and Haverstock Hill (E01000905), and is ranked within the top 15% most deprived in England and 7<sup>th</sup> most deprived in Camden. This has an IMD score of 38.08. The second most deprived LSOA includes the area around Maitland Park Villas (E01000902), and is within the top 17% deprived in England and is the 11<sup>th</sup> most deprived in Camden. This has an IMD score of 36.24. Conversely, the area around Eton Road is the least deprived LSOA in the ward (E01000906), ranking 103 (out of 133) within Camden for most deprived. This has an IMD score of 10.42.

4.5. In addition to the IMD score, and ranking score against other areas in England, ONS has also published data relating to the rate of change experienced at LSOA level between 2015 and 2019. The trends over this period for the area is shown on the figure below.



*Indices of Deprivation Rank Change 2015 – 2019 (ONS 2019)*

4.6. Between 2015 and 2019 the rate of change within ranking was limited, other than in areas of existing low deprivation levels where there was more pronounced change (on the map above bluer areas are becoming less deprived at a faster rate than redder areas). The LSOAs where the highest levels of deprivation are currently found have experienced only minor change over the four year period, with less than 3000 rank changes across much of

the core area. This suggests that between 2015 and 2019 the level of deprivation across the neighbourhood did not significantly improve for those living in the most deprived areas (nor did it become significantly worse).

## 5. Socio economic profile of groups with protected characteristics

5.1. The following section provides an equality profile of the planning framework’s population in comparison to the rest of Camden according to the nine protected characteristics named in the Equality Act 2010. The information on groups with protected characteristics below provides a context for who could be affected by a future decision to adopt the draft 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

## 6. Sex

6.1. Estimates of the split of between the sexes of the population based on mid-2020 projections are given in the table below, and compared to those for Camden as well as London as a whole.

London	Males	50.09%
	Females	49.91%
Camden	Males	51.03%
	Females	48.97%
SPD+	Males	50.02%
	Females	49.98%

Sex, Mid-year Estimates, ONS, 2021

6.2. This shows that the split between sexes for the framework area is generally in line with that of London as a whole, with the borough-level skewed towards a higher proportion of male residents not seen at the neighbourhood level.

6.3. However, released initial 2021 Census data for Camden indicates an approximate 53%:47% split between females/males boroughwide.

### **P01 Census 2021: Usual resident population by sex, local authorities in England and Wales [note 1]**

#### **England and Wales: regions (within England), unitary authorities, counties, districts, London boroughs**

Source: Office for National Statistics				
Released: 28 June 2022				
<b>Area code [note 2]</b>	<b>Area name</b>	<b>All persons</b>	<b>Females</b>	<b>Males</b>
E12000007	<b>London</b>	8,799,800	4,531,500	4,268,300
E13000001	Inner London	3,404,300	1,761,400	1,642,900
E09000007	Camden	210,100	110,600	99,500
<b>%</b>			<b>52.6</b>	<b>47.4</b>

## 7. Age

7.1. In common with other London boroughs, Camden has a relatively young population, however, as with most areas in England this is expected to 'age' with time. Taken from the census, the table below compares the average age of the population of the SPD+ area and the two wards against averages for Camden, London and England in 2011.

Area	Mean age	Medium age
Gospel Oak	36.6	35
Haverstock	35	32
SPD+	35.7	33.5
Camden	35.7	33
Greater London	35.6	33
England	39.4	39

Age, Census 2011 (ONS)

### Dataset 1: Counts of all persons by five-year age bands for selected local authority and related combined authority, region (or Wales), and England and Wales, 2021 and 2011

All persons, of ages:	Camden, 2021 estimate	Camden, 2021 count	Camden, 2011 estimate	Camden, 2011 count
0-4	4.78%	4.72%	5.98%	5.92%
5-9	4.70%	4.84%	4.95%	4.93%
10-14	4.94%	5.09%	4.35%	4.42%
15-19	6.54%	6.20%	5.68%	5.74%
20-24	9.61%	9.12%	9.92%	9.67%
25-29	10.46%	10.50%	11.77%	11.78%
30-34	9.78%	9.87%	11.09%	10.74%
35-39	7.87%	7.99%	8.70%	8.47%
40-44	6.90%	6.96%	7.25%	7.31%
45-49	6.35%	6.40%	6.01%	6.33%
50-54	6.31%	6.24%	4.97%	5.11%
55-59	5.59%	5.56%	4.25%	4.36%
60-64	4.35%	4.38%	4.20%	4.24%
65-69	3.40%	3.48%	3.32%	3.34%
70-74	3.11%	3.22%	2.56%	2.58%
75-79	2.30%	2.37%	2.02%	2.04%
80-84	1.56%	1.59%	1.57%	1.59%
85-89	0.89%	0.90%	0.93%	0.94%
90+	0.56%	0.57%	0.50%	0.50%
<b>All persons</b>	<b>210,100</b>	<b>199,800</b>	<b>220,300</b>	<b>191,500</b>



London, 2021 estimate	London, 2021 count	London, 2011 estimate	London, 2021 count	England & Wales, 2021 estimate	England & Wales, 2021 count	England & Wales, 2011 estimate	England & Wales, 2011 count
6.01%	5.87%	7.24%	7.08%	5.42%	5.31%	6.24%	6.01%
6.04%	6.13%	5.91%	5.87%	5.91%	5.97%	5.59%	5.48%
6.08%	6.18%	5.59%	5.65%	6.03%	6.10%	5.81%	5.78%
5.56%	5.49%	5.77%	5.73%	5.70%	5.58%	6.31%	6.22%
6.70%	6.49%	7.71%	7.22%	6.04%	5.89%	6.79%	6.45%
8.94%	8.91%	10.19%	9.53%	6.55%	6.49%	6.84%	6.48%
9.19%	9.18%	9.75%	9.38%	6.96%	6.90%	6.57%	6.36%
8.36%	8.40%	8.12%	8.05%	6.68%	6.65%	6.66%	6.59%
7.58%	7.59%	7.46%	7.57%	6.30%	6.28%	7.31%	7.36%
6.75%	6.73%	6.81%	7.07%	6.36%	6.35%	7.31%	7.46%
6.52%	6.44%	5.64%	5.90%	6.92%	6.92%	6.42%	6.61%
5.81%	5.82%	4.55%	4.76%	6.76%	6.82%	5.68%	5.88%
4.60%	4.64%	4.19%	4.45%	5.80%	5.87%	6.02%	6.26%
3.48%	3.55%	3.14%	3.33%	4.94%	5.03%	4.77%	4.96%
3.06%	3.14%	2.65%	2.81%	5.00%	5.09%	3.89%	4.04%
2.16%	2.21%	2.16%	2.30%	3.64%	3.70%	3.17%	3.29%
1.60%	1.63%	1.61%	1.71%	2.55%	2.58%	2.39%	2.47%
0.99%	1.01%	0.99%	1.04%	1.55%	1.57%	1.47%	1.52%
0.57%	0.58%	0.52%	0.55%	0.89%	0.89%	0.77%	0.78%
<b>8,799,800</b>	<b>8,378,700</b>	<b>8,173,900</b>	<b>7,391,900</b>	<b>59,597,300</b>	<b>57,788,000</b>	<b>56,075,900</b>	<b>52,637,700</b>

7.2. This shows that in 2011 the framework area featured a relatively young population below the general averages for England. However, overall the average age across the framework area is on par with the rest of Camden and very slightly below London-wide averages. It should be noted that when looking at ward level data, the Haverstock population was considerably younger than Gospel Oak, with averages below those for Camden, London and England. Averages for the Gospel Oak ward on the other hand remained below those for England generally, but sat above those for Camden.

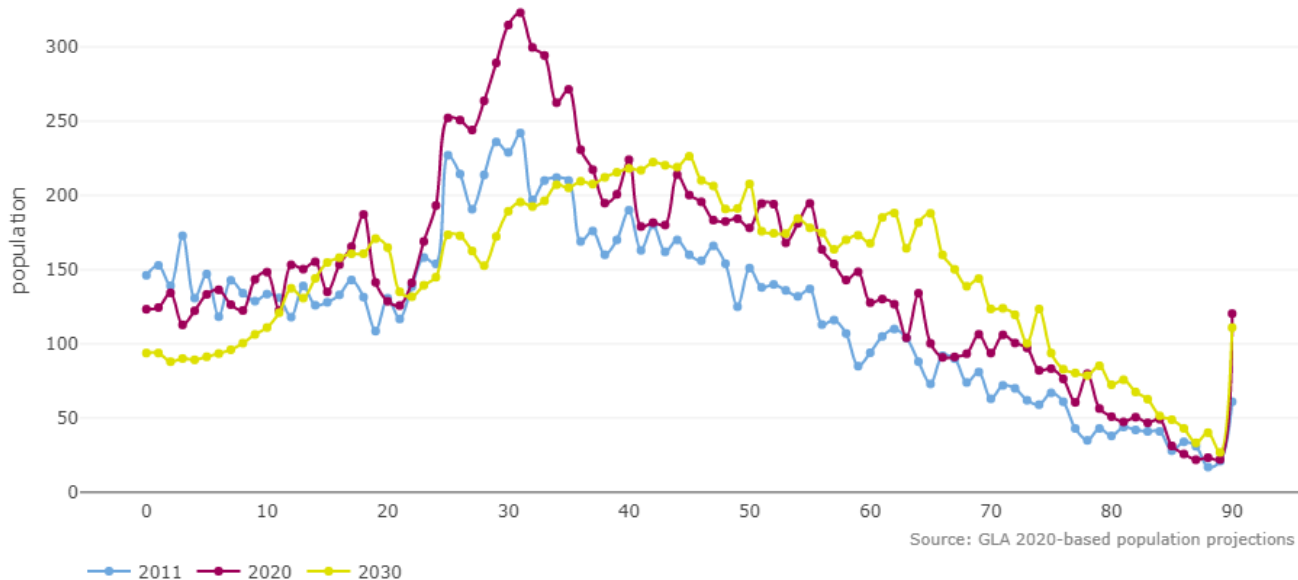
7.3. Mid-2020 population estimates, (ONS 2021), show that by 2021, the average age of the population of Camden could increase to 38.9 (an increase of 3.2 years). This is more than one year higher than London (37.7 years), but two years younger than the England average (41.0 years). The mid-2020 estimates of the working age (16 – 64) and non-working age (<16 & +65) populations for the SPD+ area compared to the Camden average are set out in the table below.

Age	Percentage of SPD+ area population	Camden average
Under 16	20.8%	17.4%
16-29	19.5%	24.1%
30-44	24.0%	25.4%
45-64	22.6%	21.2%
65+	13.2%	12.0%

Estimated resident population by age, mid-2020 (Source: Mid-year Estimates, ONS 2021)

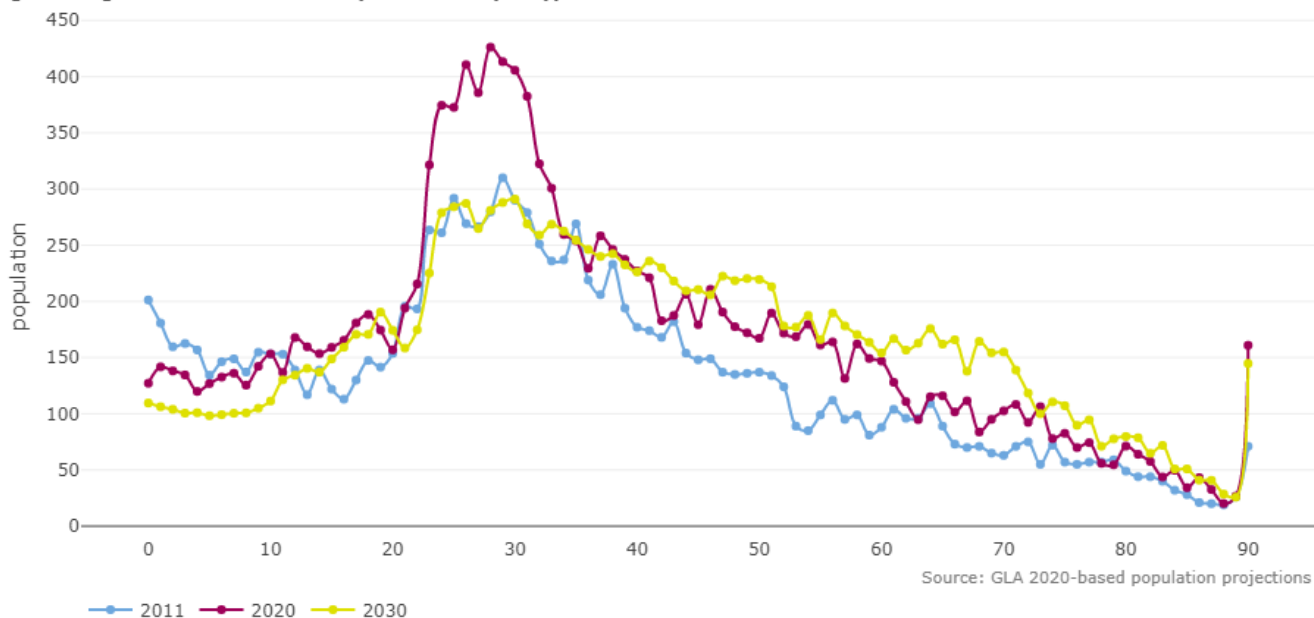
7.4. When looking at predicted future trends, the GLA 2020-based population projections have modelled expected changes in age structure to ward level up until 2031, these are shown in the figures below.

Figure 5: Age Structure: Gospel Oak (Housing Targets)



Gospel Oak age structure projection (2011 – 2031)

Figure 3: Age Structure: Haverstock (Identified Capacity)



Haverstock age structure projection (2011 – 2031)

7.5. As shown in these figures, it is forecast that over time the populations of both wards will age (i.e. average ages are projected to increase). This is reflected in the released figures 2021 Census data for Camden which indicates an increase of 3.4% in people over 65, a decrease of 4.7% in people 15-64 and a decrease of 10% in under 15s.

[https://londondatastore-upload.s3.eu-west-1.amazonaws.com/Demography/ward\\_profiles/Camden/E05000136\\_Haverstock.html](https://londondatastore-upload.s3.eu-west-1.amazonaws.com/Demography/ward_profiles/Camden/E05000136_Haverstock.html)

[https://londondatastore-upload.s3.eu-west-1.amazonaws.com/Demography/ward\\_profiles/Camden/E05000134\\_Gospel%20Oak.html](https://londondatastore-upload.s3.eu-west-1.amazonaws.com/Demography/ward_profiles/Camden/E05000134_Gospel%20Oak.html)

## 8. Disability

8.1. The latest proxy data available for disability levels in the SPD+ area remain from the 2011 Census disability/long-term health condition data set. This data is a product of a question relating to whether or not persons consider themselves to suffer from a disability or health condition that affects day-to-day activities. This includes limiting day-to-day activity a lot, a little or not limiting day-to-day activity.

Disability or health condition that affects day-to-day activities	Percentage of SPD+ area population	Camden average
A lot	8%	7%
A little	7.3%	7%
Total % affected to some degree	15.3%	14%

2011 Census: Disability or health condition that affects day-to-day activities

8.2. Around one in seven (14%) of Camden residents had a health condition or disability that limits their day-to-day-activities in some way. This rate is slightly higher, at 15.3%, for the SPD+ area meaning that there is a higher propensity for residents in the framework area to have a disability or health condition that affects their day to day activities.

## 9. Race

9.1. As with the rest of Camden, the framework area population is composed of a diverse mix of ethnic groups. The most accurate measurement for proportion of population by race is taken from the 2011 census data and is summarised in the table below.

Ethnic group	Percentage of SPD+ area population	Camden	London	England
White	66%	65.5%	59.8%	86.0%
Mixed / multiple ethnic groups	6.4%	5.6%	5.0%	2.2%
Asian / Asian British	13.7%	17.3%	18.5%	7.5%
Black/African/Caribbean/Black British	10.1%	7.4%	13.3%	3.3%
Other ethnic group	3.8%	4.2%	3.4%	1.0%

Ethnicity, Census 2011 ONS

9.2. Whilst the framework area is much more diverse than averages for England as a whole, it has a higher proportion of white residents than the averages for Camden and London. Compared to Camden and London as a whole there is a lower proportion of Asian / Asian British residents. The proportion of Black/African/Caribbean/Black British residents is higher than Camden, but lower than London. Within the Asian / Asian British category, the most prevalent sub-category of race within the framework area is Bangladesh (at 7.6%). Within the Black/African/Caribbean/Black British category, the most prevalent sub-category of race within the framework area is African (at 6%).

## 10. Religion/Belief

	Has religion (%)							No religion %	Religion not stated%
	Christian	Buddhist	Hindu	Jewish	Muslim	Sikh	Other religion		
SPD+	<b>37.2</b>	<b>0.9</b>	<b>0.7</b>	<b>2.2</b>	<b>14.9</b>	<b>0.2</b>	<b>0.4</b>	<b>24.6</b>	<b>18.9</b>
Camden	34.0	1.3	1.4	4.5	12.1	0.2	0.6	25.5	20.5
London	45.4	1.1	2.2	1.6	14.4	0.5	0.5	23.9	10.4
England	59.4	0.5	1.5	0.5	5.0	0.8	0.4	24.7	7.2

Religion, Census 2011 ONS

10.1. The SPD+ area has a higher percentage of Christians than the average for Camden, but this rate is still below the average for London and England as a whole. There is a higher percentage of Muslims within the framework area than for Camden, London or England. The third most prevalent religion in the area was Jewish, with 2.2% of the population. The average for the area falls above the average for London and England, but below that for Camden as a whole. The fourth and fifth most prevalent religions within the framework area are Buddhist and Hindu. For both, the local proportion falls below that of the levels at Camden and London wide as well as that for England.

## 11. Marriage and Civil Partnership

% of:	Single (never married or never registered a same-sex civil partnership)	Married	In a registered same-sex civil partnership	Separated (but still legally married or still legally in a same-sex civil partnership)	Divorced or formerly in a same-sex civil partnership which is now legally dissolved	Widowed or surviving partner from a same-sex civil partnership
SPD+	51.3	30.7	0.6	3.4	8.9	5.2
Camden	54.9	29.5	0.9	2.9	7.7	4.1
London	44.1	39.8	0.4	3.2	7.4	5.0
England	34.6	46.6	0.2	2.7	9.0	6.9

Marital and Civil Partnership status, Census 2011 ONS

11.1. The percentage of single people in the SPD+ area is significantly higher than in London and England. The percentage who are married in the SPD+ area are above Camden average but below London-wide and England averages.

11.2. A higher proportion of population in the framework area are separated than across Camden, London or England. This is similar for divorced, with local rates being higher than Camden or London wide levels, though less than the proportion for England. This is also true of widowed or surviving partners, where the area has higher proportions than



for Camden or London but lower than the England rates.

## **12. Pregnancy and Maternity**

12.1. Data on pregnancy and maternity is not available for the LSOAs. However, the fertility rate in Camden is low. In 2019, there were 2,448 live births in Camden, giving a total fertility rate (TFR) of 1.057 - the lowest in England. Declining national fertility and other factors affect Camden, including high housing costs, the effects of welfare reforms, the impact of short-term letting and the large number of university students living in the borough.

## **13. Sexual Orientation**

13.1. Data on sexual orientation is not available for the SPD area alone. The 2019 GP Patient Survey found that 8.5% of Camden residents surveyed identified as Lesbian, Gay, Bisexual or 'Other' – above the London average (6.1%) and the national rate (3.9%). Figures from the Annual Population Survey 2019 (national and regional only) give lower estimates for both London and England (4.5% and 3.4%). It is recognised that issues of non-responses and preferring to not disclose information in surveys mean that statistics could vary considerably.

## **14. Gender reassignment**

14.1. Data on gender reassignment is not available at a borough level, however a study by the Gender Reassignment Education and Research Study funded by the Home Office found that there is an estimated number of 200,000 to 500,000 transgender people within the UK. The Government Equalities Office tentatively estimates that around 0.3-0.8% of the UK population are transgender. In Camden, this would equate to between 800 to 2,100 people. Since the Gender Recognition Act came into force, only a small minority have obtained a Gender Recognition Certificate: 0.009% of the UK population (6,010 people across the UK between 2004/05 and 2020/21).

## **Other considerations and factors**

14.2. The COVID-19 pandemic spread to the UK in late January 2020. Older adults and people of any age who have serious underlying medical conditions like heart or lung disease or diabetes are at higher risk of developing more serious complications or die from COVID-19. COVID-19 has disproportionately impacted the health and mortality of Black and Minority Ethnic communities more than those from a White British background. The health, social and economic impacts of COVID-19 has and is likely to continue to have disproportionate impacts to particular groups. The cost of living crisis and fuel poverty with rising energy costs also have a disproportionate impact on protected groups.

14.3. Also, whilst the above figures represent data for the wards and whole SPD area covered, at a more micro level, in view of the large number of estates there may be more concentrated and divergent breakdowns on estates under the various groupings such as age, ethnicity or religion.

**15. Consultation and engagement-for full details see the published [Community Engagement Report.pdf \(camden.gov.uk\)](#)**

Please use the below grid to capture insight already received through consultation and engagement

	The groups below were contacted during the consultation	Say what the groups said	Say what the individuals said	Any key themes?
Age	Alexandra Centre (Westminster Kingsway College) Camden Centre for Learning (Chalcot School) Camden Pathways programme (CCfL) Carlton Primary School Chalcot School Chaston Nursery and Pre-preparatory School College Francais Bilingue De Londres Holmes Road Fleet Primary School French School Vicar's Road (Stewart International School - La Petite Ecole Bilingue Londres) GOALYC Gospel Oak After School Club Gospel Oak Primary School Haverstock School Octagon Nursery School Parliament Hill school Rhyl Primary School Rooftops Nursery Rosary Catholic primary school Secret garden Nursery St Dominics Roman Catholic Primary School St Patricks UCL academy Village School William Ellis school Camden Choir Camden Gymnastics Club Camden United Community Gospel	The GOALYC and Parliament Hill workshop groups – set out how youth facilities are fundamental to the safety and health of the local community and in need of investment.	Many local young people that we spoke with, as well as older residents, all agreed that investing in youth provision was a key priority for the area. Many older residents' comments aligned with those set out in the disability row below, but tended to focus on the need for enhancements to the physical environment and health facilities for an ageing population.	Investing and enhancing facilities and opportunities for the local young population remains a main priority for local regeneration. Ensuring that local open spaces, facilities and key walking routes are all accessible was also highlighted in terms of preparing for an increasingly aging population.

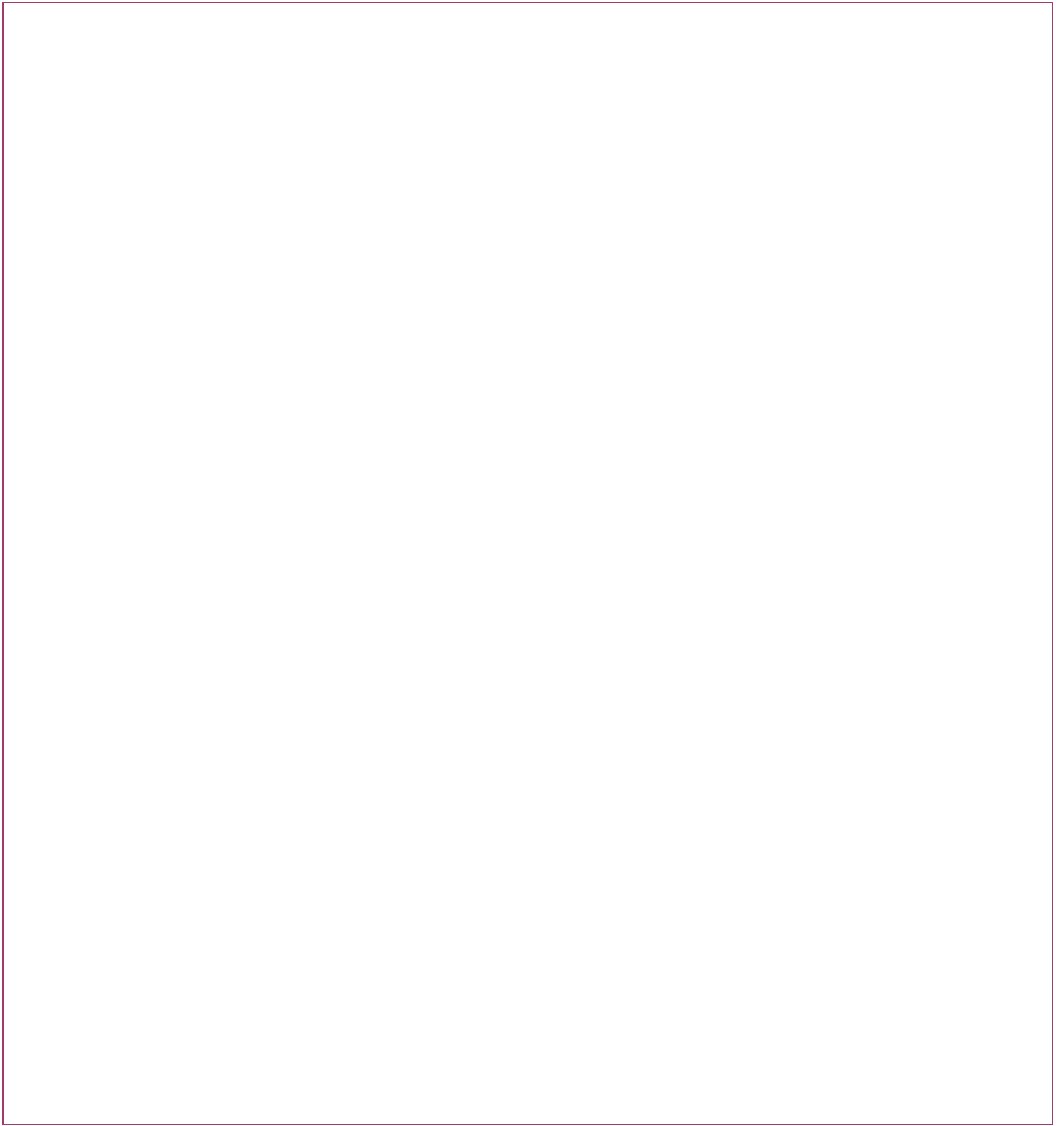
	<p>Choir  Fleet Community Centre  Fleet Singers  Friends of Queens Crescent Library  Friends of Talacre Town Green  Greater London Pensioners Association  Kentish Town City Farm Pensioners Garden Club  Pilates Clinic  Queens Crescent Community Centre  St Dominics Priory  Senior Citizens Club  Approved Care Provider (Camden Council)  Camden Disability Action  Parkinsons UK Central London Branch  Pilates Clinic  Prince of Wales Group Practice  Prince Of Wales Surgery  Queens Crescent Surgery  RNIB (Royal National Institute of Blind People)</p>			
Disability	<p>Approved Care Provider (Camden Council)  Bipolar UK Camden  Self Help Group  Camden Carers Centre Support Group  Camden Disability Action  Camden Mental Health User Involvement Service  Camden Psychotherapy Unit  Centre for Independent Living  Chain Reaction in Town  Deaf Parenting UK  Harmood Childrens</p>	<p>Following workshops with Camden Disability Action, it was clear that ensuring improved health facilities, more accessible key routes, open spaces and facilities were seen as fundamental for supporting those with a physical disability.</p>	<p>Many individual respondents reflected these comments. Mental health was also a commonly raised theme, with many noting that improved green open spaces and safety as well as providing inclusive spaces for all were key.</p>	<p>Given the anticipated aging population, it is likely that new investment into health infrastructure will be necessary in the local area, together with enhancements of local parks, walking routes and community facilities.</p>

	<p>Centre Drop In Foundation66 Herbert Street Registered Care Home Four Trees Surgery Gospel Oak Health Centre Hampstead Chiropody Hampstead Group Practice Hartwig Care Approved Care Provider (Camden Council) Maitland Park Care Home Mental Health Forum (Camden Council) Multiple Sclerosis Society Camden Group Parkinsons UK Pilates Clinic Prince of Wales Group Practice Prince Of Wales Surgery Queens Crescent Surgery RNIB (Royal National Institute of Blind People) Shape Arts (disability arts group) Remark UK The Camden Society (London office) Camden Disability Network Health Watch Camden The Staying Inn</p>			
<p>Gender reassignment</p>	<p>There are no local groups within the area with a specific remit for gender reassignment. However, general consultation efforts to widen the audience (i.e. writing to every house hold twice and online presence) would have ensured notification of any local resident falling</p>	<p>No comments relating to this specific characteristic received</p>	<p>No comments relating to this specific characteristic received</p>	<p>n/a</p>



	within this characteristic.			
Marriage and civil partnership	There are no local groups within the area with a specific remit for marriage and civil partnership (other than the faith institutions listed above). However, general consultation efforts to wider audience (i.e. writing to every house hold twice and online presence) would have ensured notification of any local resident falling within this characteristic.	No comments relating to this specific characteristic received	No comments relating to this specific characteristic received	n/a
Pregnancy and maternity	Baby Feeding Drop-in at Harmood Childrens Centre BabyiSH Day Care Harmood Childrens Centre University College London Hospitals Playscheme Parenting UK Harmood Childrens Centre Drop In	No comments relating to this specific characteristic received	No comments relating to this specific characteristic received	Key themes in relation to need for enhanced health infrastructure and improved accessibility would remain pertinent to individuals within this protected group.
Race	Afrocongolese Women and Youth Bangladeshi Mental Health and Wellbeing Forum British Somali Community Camden Afghan Community Camden Bangali Residents Association CarAF Centre Henna Asian Womens Group Simon Community Somali Community Centre Tara Irish Pensioners Club	No comments relating to this specific characteristic received	No comments relating to this specific characteristic received, however, many individuals noted that the area's diversity is one of its most valued assets.	Key themes identified in terms of the need for investment to continue to build community cohesion through community facilities that are inclusive and welcoming to all remains pertinent to individuals within this protected group.
Religion or belief	All Hallows Church (Church of England) Church of St Silas The Martyr (Church of England) Gospel Oak	Representatives from the Kentish Town Baitul Aman Mosque noted that there is demand for a	A number of individual responses also noted that there was demand for a larger mosque in	The Kentish Town Baitul Aman Mosque remains a fundamental faith and community

	<p>Methodist Church Hampstead Seveth-day Adventist Church Hindu Centre Holy Trinity Church (Hartland Road) (Church of England) Kentish Town Baitul Aman Mosque Kentish Town Evangelical Church South Hampstead Synagogue St Dominics Priory St Martins Church (Church of England) St Saviours Church (Church of England) St Silas &amp; Holy Trinity Three Faiths Forum</p>	<p>larger mosque in the local area.</p>	<p>the local area.</p>	<p>centre serving a wide catchment area in North London. The planning framework cannot approve new developments or designate land, but the need to support key local faith and community centres to modernise their facilities remains a key theme.</p>
<p>Sex/gender</p>	<p>Afrocongolese Women and Youth Baby Feeding Drop-in at Harmond Childrens Centre Henna Asian Womens Group London Pride Morris Men Young Women &amp; Girls Football Programme</p>	<p>No comments relating to this specific characteristic received</p>	<p>In conversations with many young people, it was noted that the areas local open spaces tend to be less well catered for girls. Many young women also spoke about their anxiety about using local free sports facilities due to their design and the dominance of groups of younger men, highlighting a design issue with this infrastructure</p>	<p>Themes of gender inclusivity in local facilities and open spaces was clearly identified as an area where improvement is required.</p>
<p>Sexual orientation</p>	<p>There are no local groups within the area with a specific remit for sexual orientation. However, general consultation efforts to wider audience (i.e. writing to every house hold twice and online presence) would have ensured notification of any local resident falling within this characteristic.</p>	<p>No comments relating to this specific characteristic received</p>	<p>No comments relating to this specific characteristic received</p>	<p>No specific themes raised, though the key issue identified around the general need to ensure that community facilities and local open spaces are fully inclusive and welcoming to all would apply here.</p>



## 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 EIAs and
  - For organisational change / restructure EIAs 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 EIA 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.



## Section 3: ANALYSING YOUR EQUALITY INFORMATION AND ASSESSING THE IMPACT

**Question 3: Analysing the evidence outlined above, does the proposed decision have an impact (positive or adverse) on our duty to eliminate discrimination/harassment and victimisation, advance equality of opportunity or foster good relations between different groups in the community (those that share characteristics and those that do not)?**

Please use this grid to summarise the impacts outlined above.

Protected group	Summarise any possible negative impacts that have been identified for each protected group and the impact of this for the development of the activity	Summarise any positive impacts or potential opportunities to advance equality or foster good relations for each protected group
Age	No significant impacts identified. The framework itself does not approve any developments nor designate land for development but older people may be impacted more by construction if development comes forward.	The SPD Framework provides priorities for investment in new or enhanced facilities and opportunities for local young people. Similarly, prioritising improved health infrastructure together with more diverse and accessible open spaces and community facilities can address issues facing older residents. New housing can provide more accessible and warmer homes (and for all groups)
Disability	No significant impacts identified. The framework itself does not approve any developments nor designate land for development but people with disabilities and health issues may be impacted more by construction if development comes forward.	Prioritising improved health infrastructure together with more accessible open spaces and community facilities seeks to address issues facing residents with disabilities and health. New housing can provide more accessible homes and address other health issues e.g. through reducing overcrowding or better heating
Gender reassignment	No significant impacts identified. The framework itself does not approve any developments nor designate land for development but some groups may be impacted by construction if development comes forward.	People may feel more vulnerable in certain locations and the SPD supports projects which improve the quality and safety of streets and public spaces
Marriage and Civil Partnership	No significant impacts identified. The framework itself does not approve any developments nor designate land for development but people may be	No discernable impacts identified.

	impacted by construction if development comes forward.	
Pregnancy and maternity	No significant impacts identified. The framework itself does not approve any developments nor designate land for development but people may be impacted by construction if development comes forward.	The SPD highlights the importance of community provision and health infrastructure and seeks provision to be in conveniently accessible locations
Race	No significant impacts identified. The framework itself does not approve any developments nor designate land for development but people may be impacted by construction if development comes forward.	The SPD highlights the importance of maintaining and supporting a diverse community and safeguarding and enhancing community provision to meet local needs.
Religion or belief	No significant impacts identified. The framework itself does not approve any developments nor designate land for development but people may be impacted by construction if development comes forward.	The SPD highlights the importance of maintaining and supporting a diverse community and safeguarding and enhancing community provision to meet local needs.
Sex	No significant impacts identified. The framework itself does not approve any developments nor designate land for development but people may be impacted by construction if development comes forward.	People may feel more vulnerable in certain locations and the SPD supports projects which improve the quality and safety of streets and public spaces and also highlights the need to create green and open spaces particularly to make young females can feel safer
Sexual orientation	No significant impacts identified. The framework itself does not approve any developments nor designate land for development but people may be impacted by construction if development comes forward.	People may feel more vulnerable in certain locations and the SPD supports projects which improve the quality and safety of streets and public spaces

Overall the SPD will have positive impacts and its principles and guidance supports a range of improvements that will have positive impacts for groups with protected characteristics, including supporting new and better housing that is designed to respond to the needs of the wide range of protected characteristics. Objectives aim to make the area easier, safer and more pleasant to get around for all, this would include pregnant women, parents with young children, older people and people with a disability or health issues. This can improve the health and well-being of local people by tackling inactivity, isolation, mental health problems, and reliance on more expensive transportation.

Delivering the right types and mix of housing including affordable social housing and family sized homes will help to ensure the neighbourhood remains a place with a diverse mix of residents.

New homes will have to be designed to meet Building Regulations (including lifetime

homes and wheelchair accessible homes) to benefit older people and people with disabilities. New housing can include lifts and provide better living conditions with better insulation and use more sustainable forms of energy such as centralised heating and hot water, and photovoltaics to generate electricity meaning lower running costs and reducing fuel poverty. Families with children and other residents from groups with protected characteristics can benefit from better access to enhanced and new amenity and play spaces.

## Section 4 – PLANNING FOR IMPROVEMENT

### 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 overall the SPD will have no disproportionate adverse impact for 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 or give permission for it, new developments may have an impact on existing uses and occupiers which may need to be suitably addressed and these impacts will need to be assessed in considering more detailed proposals as they come forward and which may require further more focussed equality assessments.

Identified at Q2, new development may also generate an increased residential population placing demands for new or enhanced social infrastructure and this can be secured through the design of individual schemes, CIP development schemes, s106 planning obligations and Community Infrastructure Levy (CIL) to address 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 be addressed in 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 suffer ill health and may be more susceptible to noise or air quality impacts. Major developments will be required to put in place construction management plans to manage these kind of impacts and require developers/contractors to liaise with local residents on addressing concerns during construction e.g. through construction working groups including resident attendance.



**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?**

It is not considered that the adoption of the SPD would discriminate unlawfully against people with protected characteristics as defined by the Equality Act 2010. The guidance provided is in line with the priorities identified through consultations and the adopted Local Plan and other Council strategies.

The SPD and its objectives aim to positively address 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. These range from supporting the creation of better designed and safer environments, improvements to walking and cycling routes, enhanced social and green infrastructure 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 extensive engagement gave a range of people and groups an opportunity to provide a range of views and the chance to identify 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 responding to the feedback and revising the SPD to ensure that no group is unduly disadvantaged by the guidance and it is considered that no part of the draft SPD is considered to discriminate unlawfully.

The consultation also targeted and encouraged participation from groups where participation is disproportionately low and responses were considered and the SPD was revised to respond to the feedback received. It is anticipated that the Council will adopt the final version of the document in autumn 2021. The associated and more detailed consultation feedback report describes the wide ranging efforts to engage widely, including with protected groups.

## Section 5 – OUTCOME OF THE EIA

Use this stage to record the outcome of the EIA. An EIA has four possible outcomes.

Outcome of analysis	Description	Select as applicable
Continue the activity	The EIA shows no potential for discrimination and all appropriate opportunities to advance equality and foster good relations have been taken.	<b>Yes</b>
Change the activity	The EIA identified the need to make changes to the activity to ensure it does not discriminate and/ or that all appropriate opportunities to advance equality and /or foster good relations have been taken. These changes are included in the planning for improvement section of this form.	
Justify and continue the activity without changes	The EIA has identified discrimination and / or missed opportunities to advance equality and / or foster good relations but it is still reasonable to continue the activity. Outline the reasons for this and the information used to reach this decision in the box below.	
Stop the activity	The EIA shows unlawful discrimination.	
Comments (if required):		

## Section 6 – CHECK AND SIGN OFF

EIA prepared by: John Diver

Date: October 2020 and updated January 2022

EIA checked by: David Morrissey

Date: Checked and updated October 2022

EIA approved by: Richard Wilson Strategic Lead Regeneration and Place

Date: October 2022

(Relevant Director Sponsor)

### What to do upon approval

The EqIA will be published alongside the adopted Supplementary Planning Document