

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: **Kentish Town Planning Framework**

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?

With significant redevelopment and change likely to take place in the area in the coming years, the London Borough of Camden wants to ensure a strategic and coordinated approach is taken to deliver the best outcomes for our communities.

What is changing and why?

Camden Council is preparing the Kentish Town Planning Framework. This will become a new piece of guidance, relating to a specific area of the borough, which includes the Regis Road area and the area north of Regis Road and the railways.

The recently adopted Local Plan sets out the Council's planning policies covering the period from 2017 – 2031. Policy G1 (Delivery and Location of Growth) of the Local Plan re-designates part of the Kentish Town area from protected industrial land to the new Regis Road Growth Area.

The Local Plan identifies the Regis Road Growth Area as a significant opportunity to deliver higher density industrial provision as part of a redevelopment scheme that will also deliver a substantial increase in homes and jobs, as well as improve movement around and through the area, reconnecting communities. The Local Plan policy states that the Council expects a comprehensive employment-led development at Kentish Town Regis Road that retains existing businesses on the site as far as possible and provides a mix of uses including industry, logistics and other employment uses, housing, community facilities and open space. The Local Plan specifies that a planning framework to provide further detailed guidance on the development of this area should be prepared with stakeholder input prior to any planning application coming forward.

The area north of Regis Road remains the designated Kentish Town Industry Area. Local Plan policies E1 (Economic Development) and E2 (Employment premises and Sites) safeguard the Kentish Town Industry Area for industrial and warehouse uses. The Council will consider higher intensity redevelopment proposals for employment uses and will resist proposals that would lead to the loss of sites in Use Classes B1(b), B1(c), B2 and B8 and similar sui generis. Other priority uses such as residential could form part of proposals provided that they would not prejudice the successful operation of businesses.

In addition to the Local Plan, there are several national, regional and local planning policies that form the context for the planning framework. These include:

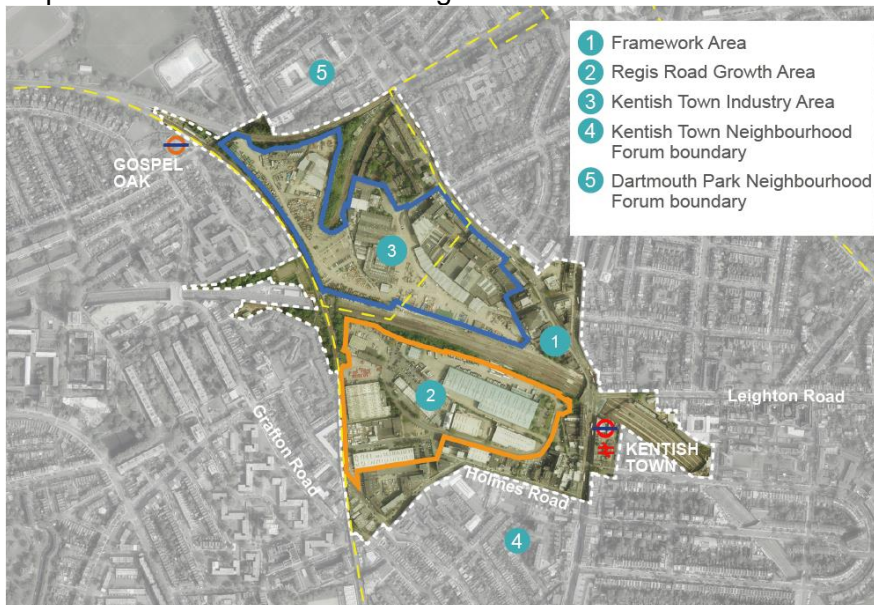
- The National Planning Policy Framework (NPPF) July 2019, which encourages the creation of healthy places and wellbeing by encouraging developments that promote walking and cycling with significant emphasis on high quality design. The NPPF promotes the effective use of land in meeting the need for homes and other uses.
- The Camden Plan to achieve the 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.
- Camden's Site Allocation Plan, which will include specific allocations for a number of key sites within the framework area. The draft Site Allocations Plan was approved by Cabinet on 13 November 2019, with a public consultation from 13th Feb to 27th March 2020.
- Neighbourhood Plans, which form part of the development plan but are prepared by the community through neighbourhood forums. There are two active neighbourhood forums in the

area, The Kentish Town Neighbourhood Forum and the Dartmouth Park Neighbourhood Forum each covering part of the framework area. The Kentish Town Neighbourhood Plan was adopted in September 2016. It identifies the Kentish Town Potential Development Area. The Plan states that the area does not feel like part of Kentish Town and seeks a comprehensive and coordinated approach taken to potential redevelopment. The plan highlights the protection of industrial floorspace and the need for much needed housing in Kentish Town.

Dartmouth Park Neighbourhood Plan was adopted in March 2020. The plan sees the Murphy site as an opportunity to enhance the Dartmouth Park area with a sensitively designed scheme for a mix of residential and business/employment units.

The Kentish Town and Dartmouth Park Neighbourhood Forums have significant interest in the future development of the area. The Council has collaborated with both neighbourhood forums throughout the development of the framework.

Map of the Kentish Town Planning Framework Area



What are the decision makers being asked to decide?

A first stage of public engagement focusing on issues and ideas was held in winter/spring 2018. Separate engagement with businesses and landowners focusing on issues, ideas and future aspirations was held over the same period. The feedback from the public, business and landowner engagement was used to help prepare a first draft planning framework document.

A public consultation on the draft framework document was held in autumn 2018.

The engagement and consultation process included a number of drop-in sessions at Kentish Town Library, an online and physical questionnaire, workshops with Kentish Town and Dartmouth Park Neighbourhood Forums, meetings with businesses and landowners, written feedback from organisations and businesses, workshops at Gospel Oak Primary School run by Camden Community Makers and an open discussion session with young people at Kentish Town Community Centre.

A further stage of public consultation on a final draft framework document was held in winter 2019/2020 and the feedback used to further amend and update the framework document.

It is intended for the framework to be adopted as a Supplementary Planning Document (SPD) by the Council. The document will therefore have material weight in determining planning applications within the framework area. It will not directly deliver development, but will guide any proposed development in the area.

The Council is to take a formal decision to adopt the Kentish Town Planning Framework as a Supplementary Planning Guidance Document.

What are the main aims?

To establish adopted planning guidance to support a strategic and coordinated approach to development of the Regis Road Growth Area and Kentish Town Industry Area to deliver the best outcomes for our communities; and having an adopted planning framework in place can strongly influence this.

The KTPF specifically drives forward a range of crosscutting Camden Plan objectives including: working with our communities to take forward shared priorities; delivering homes and as many genuinely affordable homes as possible; building communities that are mixed with well-designed homes and infrastructure; promoting health and wellbeing, accessibility for all and independent live; supporting integration and cohesion and helping Camden be the best place in London to do business and work and providing local jobs and training opportunities.

How will the changes affect people?

The planning framework does not in itself authorise or action development to take place in the area, it is a guide for planning and growth if development were to occur.

The planning framework will aim to promote mixed, balanced and sustainable communities and well planned employment-led development.



Notes to Question 1

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

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?

A socially mixed place that builds on the distinctive community and character of Kentish Town, bringing residents, workers and visitors together....

Socio economic profile of groups with protected characteristics

Background

The Kentish Town Planning Framework is particularly relevant to existing and future communities of the framework area and neighbouring areas including residents and businesses.

Most of the data in this EquIA is from the latest 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 a projected population growth in Kentish Town and Gospel Oak wards.

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

Table 1: GLA 2017-based Population Projections, LB Camden

Ward Name	2011	2019	2022	2027	2031	2037	2041
Wards							
Kentish Town	13,400	15,155	15,368	18,839	19,104	19,284	19,368
Gospel Oak	11,239	12,332	12,312	12,501	12,376	12,266	12,365
Highgate	10,938	11,676	11,679	11,480	11,360	11,229	11,194
Borough							
Camden	245,249	249,345	256,021	267,888	274,835	282,441	285,235

For the period 2019 to 2041 the resident population in Kentish Town ward is expected to grow by 4,213 and the majority (3,471) is projected to increase from 2022 to 2027. The components of population change show a positive natural change (more births than deaths) over the next 10 years of + 500 and a net increase due to migration of + 3,200.

For the period 2019 and 2041 the number of residents in Gospel Oak ward are projected to remain roughly the same with only a marginal increase. However, this projection could be subject to change following recent community conversations regarding more investment into the ward including the possibility of new homes at Wendling and St Stephens Close Estates.

For the period 2019 to 2041, the number of residents in Highgate ward is projected to decrease by 482, which is in contrast to the total population in Camden, which is projected to increase steadily over the coming years up to 2041.

Covid-19 Pandemic in the United Kingdom

The ongoing COVID-19 pandemic spread to the UK in late January 2020. As of 1 July 2020 there have been 313,483 confirmed cases and 43,906 deaths of confirmed cases, the world's second highest death rate per capita among major countries. London had the worst overall mortality rate of any region in England and Wales. As of 1 July 2020 Camden had 643 confirmed cases and 158 coronavirus-related deaths, and is ranked 48 among local authorities in England and Wales.

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, 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 has seen a dramatic increase in unemployment and the numbers of people claiming benefit.

The health, social and economic impacts of the COVID-19 pandemic has and will continue to have disproportionate impacts to particular groups, which are looked further into later in this section of

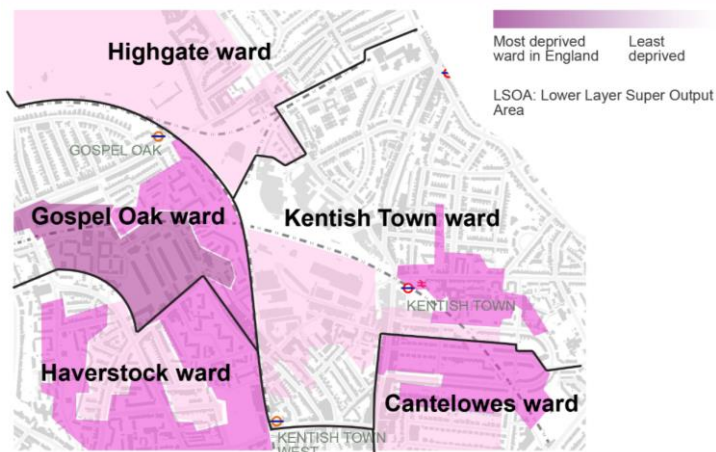
the EquIA.

Deprivation

There are significant economic and social disparities within the wards that include parts of the framework area.

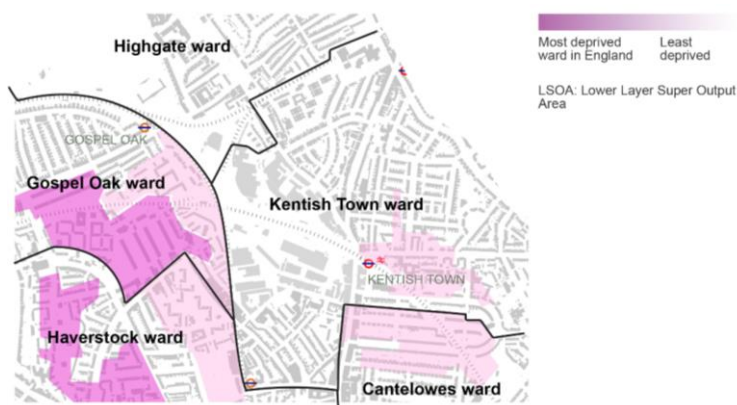
The Indices of Deprivation provides a set of relative measures of deprivation for small areas (Lower Super Output Areas - LSOAs) across England. The domains of deprivation measured include income, employment, education, skills and training, health and disability, crime, barriers to housing and services, and living environment deprivation. The two most recent Indices of Deprivation are for 2015 and 2019.

Indices of Deprivation 2015



The Indices of Deprivation 2015 showed Kentish Town ward contained one LSOA that was within the 10%-20% most deprived in England and one other that was within the 20%-30% most deprived. Gospel Oak Ward to the west of the framework area contained the first and second most deprived LSOAs in Camden, which were both in the top 5% in England. Highgate ward to the north contained one LSOA that was within 10%-20% most deprived in England and two LSOAs that were within the 20%-30% most deprived in England.

Indices of Deprivation 2019



The Indices of deprivation 2019 showed a borough wide improvement since 2015. The most deprived area in Kentish Town ward is now within the top 20%-30% in England whereas previously it was within the top 10%-20%. Gospel Oak still contains the first most deprived LSOA in Camden and the two most deprived LSOAs in the ward are within the top 10%-20% in England whereas previously they were both in the top 5%. The most deprived LSOA in Highgate ward remains in the top 10%-20% in England.

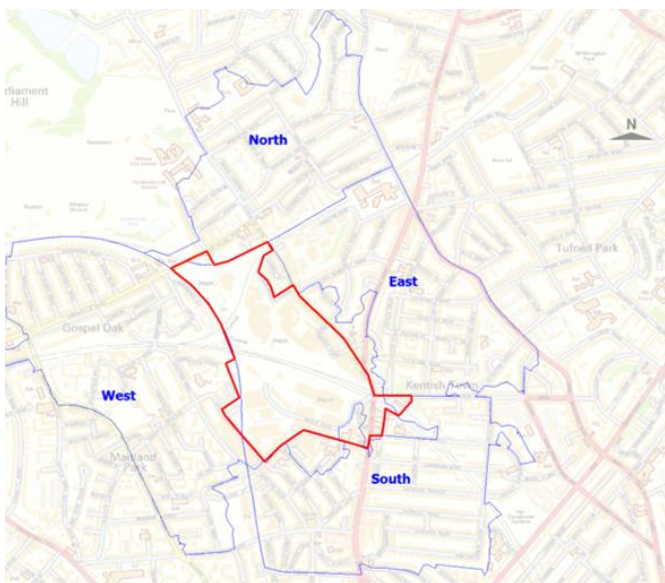
Resident Population for Lower Super Output Areas

There are limited homes in the framework area most of which are towards the North East at Sanderson Close Estate (12 units mostly 4 bedroom family housing), Carrol Close estate (56 units mostly 3 bedroom family housing) and Highgate Road (mixed units mostly above commercial premises).

All residents living in and within close proximity to the framework area could be most affected by development.

For this EquIA, data is taken for LSOAs that cover parts the framework area as well as LSOAs that overlap or borders with it (north, south, east, west), as data for the framework area alone is not readily available. Demographic data that is available for most of the framework area is larger than the area itself and referred to as 'Site Area +'. Demographic data that is not available for LSOA areas only are taken for Camden as a whole.

Map of the framework area and combined LSOAs (North, East, South & West)



- Framework area (broad representation of the framework area (red))
- Site Area + (blue line closest to the framework area borders)
- LSOAs North, South, East and West (blue)

Home Ownership

Table 2: Home ownership – Census 2011

Home Ownership	Site Area +	North	East	South	West	Camden
All People	2,988	4,667	5,906	6,336	9,897	219,861
Area (hectares)	43	36	38	42	57	2,180
Owned outright	9.4 %	27.2%	18.1%	16.8%	10.5%	17.1%
Shared ownership	2.4 %	0.9%	0.6%	0.7%	1%	0.7%
Social rented	48.6%	31.6%	28.5	40%	55.3%	33.1%
Other social rented	19%	14.4%	10.7	4.8%	7.7%	10.1%
Private rented	25%	18%	31	23%	18%	32%
Private landlord / letting agency	23.9%	16.9%	29.6%	21.3%	16.8%	30.5%

The socio-economic profile of residents living in and within close proximity to the framework area and who could be affected by development varies. In terms of home ownership there are a significantly higher proportion of residents who own their home outright living to the north (27.2%), compared to the east (18.1%), the south (16.8%), Site area + (9.4%) and Camden as a whole (17.1%). The disparity is wider when compared to the west (Gospel Oak) with 10.5% of residents owning their homes outright.

There is similar disparity in terms of social rented homes. There are significantly more social rented homes to the west (55.3%), Site area + (48.6%) and south (40%) than there are to the east (28.5%) and north (31.6%). The borough wide proportion of social rented homes is 30.5%.

The proportion of private rented homes is higher to the east (31%) than it is to the south (23%), north (18%) and west (18%). All LSOAs adjacent to the framework area have fewer private rented homes than the Camden average of (32%).

Overcrowded Accommodation

Table 3: Occupancy Rating, Census 2011

Occupancy rating	Site Area +	North	East	South	West	Camden
All People	2,988	4,667	5,906	6,336	9,897	219,861
Area (hectares)	43	36	38	42	57	2,180
Occupancy rating	35.9%	17.6%	31.7%	30.4%	35.2%	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 rooms or bedrooms than required by the household. The occupancy rating for the Site area + (35.9%), areas south (30.4%), east (31.7%) and west (35.2%) of the framework area is similar to the borough wide proportion (32.5%), with marginal differences. However the north of the framework area have significantly fewer homes with a -1 occupancy rate (17.6%).

Groups With Protected Characteristics

The information on groups with protected characteristics provides a context for who could be affected by the decision to adopt the planning framework.

The protected groups characteristics comprise the following: Age; Disability; Gender reassignment; Pregnancy and Maternity; Marriage and Civil Partnership; Race; Religion/Belief; Sex and ; Sexual Orientation:

Sex

Table 4: Sex, Census 2011

Sex	Site Area +	North	East	South	West	Camden
All People	2,988	4,667	5,906	6,336	9,897	219,861
Area (hectares)	43	36	38	42	57	2,180
Male	48.5%	48.4%	47.9%	47.4%	48.2%	49%
Female	51.5%	51.6%	52.1%	52.6%	51.8%	51%

The proportion of local male to female residents is similar to the borough wide proportion (male 49%, female 51%), with marginal variations.

Age

Table 5: Age, Census 2011

Age	Site Area +	North	East	South	West	Camden
All People	2,988	4,667	5,906	6,336	9,897	219,861
Area (hectares)	43	36	38	42	57	2,180
0-4	5.3%	5.5%	5.9%	5.7%	6.7%	6%
5-15	9.5%	12%	9.5%	10.5%	14.2%	10.1%
16-29	30.9%	18.6%	23.3%	25.3%	23.4%	26.6%
30-44	26.2%	24.1%	29.3%	25.6%	23.6%	27%
45-59	15.5%	19.5%	16.6%	17.3%	17%	15.2%
60-74	8.3%	14.4%	11	10.1%	10.1%	10.1%
75-89	3.9%	5.3%	3.7%	5%	4.6%	4.5%
90+	0.4%	0.4%	0.6%	0.4%	0.5%	0.5%

The age profile of local residents is broadly similar to the borough wide profile. The area to the north of the framework area does have a higher proportion of residents aged 60 + (20.1%) than the Site area + (12.6%), east (15.3%), south (15.5%) and west (15.2%). This proportion is also higher than the proportion of residents aged 60 + living in the borough (15.1%).

There are a number of local groups around the framework area who provide social, health and well-being services to local older people and these include QCCA, Thanet, Ingestre and Kentish Town community centre. Wellesley Road Care Home is close by and provides care to older people.

Older adults and people of any age who have serious underlying medical conditions like heart or lung disease or diabetes are at higher risk for developing more serious complications and die from COVID-19 illness. There will continue to be a need for communities and community groups to provide extra care and support to vulnerable older people even as and when the numbers of people infected with COVID-19 fall.

The Gospel Oak area to the west of the framework area has a noticeably higher proportion of young residents aged 5 to 15 (14.2%) than the areas, Site area + (9.5%), north (12%), east (9.5%) and south (10.5%).

Communities in Kentish Town have raised concern that there are not enough local provisions for young people and this is partly why there have been some recent anti-social and violent incidents involving young people, which has left many local people feeling unsafe. A Camden Youth Safety Task Force was set up in December 2017 and has involved participation from local people in Kentish Town to work together and intervene to keep young people safe.

There are several voluntary sector groups close to the framework area providing a range of services and provisions to young people. These include Kentish Town City Farm, Gospel Oak Action Link, Kentish Town Community Centre and Thanet Community Centre. However, in consultation, young people have said that they do not always feel comfortable using services outside of their immediate area without their friends and with other young people who they do not know.

Race

Table 6: Ethnicity, Census 2011

Age	Site Area +	North	East	South	West	Camden
All People	2,988	4,667	5,906	6,336	9,897	219,861
Area (hectares)	43	36	38	42	57	2,180
White	71.4%	81.2%	78%	72%	65%	66.3%
Mixed / Multiple Ethnic Groups	7.8%	5.4%	6.1%	6.3%	6.6%	5.6%
Asian or Asian British	7.8%	5.2%	8%	10.3%	13.8%	16.1%
Black or Black British	10	5.7%	6%	9.4%	10.7%	8.2%
Other Ethnic Group	3%	2.5%	1.9%	2%	3.9%	3.8%
Black & minority Ethnic Groups	28.6%	18.8%	22%	28%	35%	33.7%
All Minority Ethnic Groups	48.3%	36.1%	41.7%	47.7%	52.3%	56%

Detailed Ethnic Groups	Site Area +	North	East	South	West	Camden
White						
English/Welsh/Scottish/N Irish/British	51.7%	63.9%	58.3%	52.3%	47.7%	44.0%
Irish	4.7%	2.7%	4.6%	4.0%	3.5%	3.2%
Gypsy or Irish Traveller	0.1%	0.0%	0.1%	0.2%	0.1%	0.1%
Other White	15.0%	14.5%	15.0%	15.5%	13.6%	19.0%
Mixed / Multiple Ethnic Groups						
White & Black Caribbean	1.9%	1.5%	1.6%	1.5%	1.7%	1.1%
White & Black British	1.1%	0.7%	0.7%	1.2%	1.3%	0.8%
White & Asian	1.8%	1.9%	1.9%	1.3%	1.4%	1.8%
Other Mixed	3.0%	1.4%	1.8%	2.3%	2.2%	1.9%
Asian / Asian British						
Indian	1.0%	1.0%	1.0%	1.5%	1.0%	2.8%

Pakistani	1.2%	0.1%	0.1%	0.7%	0.5%	0.7%
Bangladeshi	2.7%	2.1%	3.8%	4.4%	7.7%	5.7%
Chinese	1.4%	0.4%	1.0%	1.1%	1.6%	2.9%
Other Asian	1.5%	1.5%	2.1%	2.6%	2.9%	4.0%
Black / African / Caribbean / Black British						
African	5.6%	3.1%	3.7%	5.7%	6.3%	4.9%
Caribbean	1.6%	1.5%	1.7%	2.0%	2.3%	1.6%
Other Black	2.9%	1.0%	0.6%	1.7%	2.2%	1.7%
Other ethnic group						
Arab	0.5%	0.6%	0.4%	0.8%	1.5%	1.6%
Any Other Ethnic Group	2.5%	1.9%	1.5%	1.2%	2.4%	2.3%

Most local residents are White and the proportion of White residents living in and around the framework area is mostly higher than the borough wide proportion of 66.3%. The proportion of White residents is highest to the north of the framework area (81.2%) and lowest to the west (65%). A significant majority of White residents in and around the framework area are English/Welsh/Scottish/Northern Irish/British (site area + 51.7%, north 63.9%, east 58.3%, south 52.3%, west 47.7%); and are higher than the borough wide proportion of 44.0%.

The proportions of local residents who are not White are similar to the borough wide proportions. The second largest Black, Asian and Minority Ethnic group living locally are either Black / Black British with the majority being of African origin, or residents of Asian descent. The proportion of Black / Black British residents living in the Site area + (10%) and north of the framework area (5.7%) is marginally higher than the proportion of residents of Asian descent (Site area + 7.8%, north 5.2%). The areas to the east, south and west of the framework area has a marginally higher proportion of residents of Asian descent (east 8%, south 10.3%, west 13.8%) when compared to Black residents (east 6%, south 9.4%, west 10.7%). The majority of local Asian residents are of Bangladeshi origin and this is highest to the west of the framework area (7.7%). Bengali is the second most popular language spoken locally (the first being English).

Public Health England published a report on the impact of Covid-19 on Black, Asian and Minority Ethnic Britons and it is clear that Black, Asian and Minority Ethnic communities are disproportionately affected by the disease and Black and Asian groups were all significantly more likely to be critically ill and die with Covid-19 than those from a White British Background. People from the Bangladeshi community face twice the risk of dying from Covid-19. The reasons for the disparities uncovered by the report are still not known however it appears strongly that social inequalities are the likely factors. Black, Asian and Minority Ethnic Britons are more likely to be lower paid, living in poorer accommodation and be employed in public-facing jobs, which all run a greater risk during this pandemic.

Camden Council has publicly announced that it stands in solidarity with Black Lives Matter and acknowledges that racism is here in our communities. The Council is involved in work 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.

There are a number of groups providing services to Black, Asian and Minority Ethnic communities and many of these groups are in Kentish Town. These include Somali Youth Development Group, Somali Supplementary Schools Project, Sante Refugee Mental Health Access Project and the Caraf Centre who provide parenting skills, training and careers advice.

Camden Council is participating in the Home Office's Vulnerable Person's Relocation Scheme (VPRS) for the resettlement of Syrian Households in response to the refugee crisis in Europe. Camden has now welcomed 20 households (75 beneficiaries) under this scheme. Camden Council is also participating in the Home Office's Vulnerable Children's Relocation Scheme (VCRS). 2 Households (7 beneficiaries) have arrived in Camden under this scheme.

Religion

Table 7: Religion, Census 2011

Religion	Site Area +	North	East	South	West	Camden
All People	2,988	4,667	5,906	6,336	9,897	219,861
Area (hectares)	43	36	38	42	57	2,180
Christian	35%	35.5%	34.1%	34.2%	38%	38.5%
Buddhist	0.9%	0.8%	0.8%	0.9%	0.9%	1.4%
Hindu	0.2%	0.4%	0.5%	0.6%	0.7%	1.6%
Jewish	1.6%	2.8%	1.8%	1.6%	1.4%	5.1%
Muslim	9.8%	6%	6.2%	9.8%	15.6%	13.8%
Sikh	0.1%	0.1%	0.1%	0.1%	0.1%	0.2%
Other	1%	0.7%	0.6%	0.5%	0.4%	0.6%
No religion	29.6%	36%	37.1%	32.9%	23.9%	29.1%
Religion not stated	21.8%	17.7%	18.6%	19.6%	19%	9.6%

Most local residents are of Christian faith followed by not having a religion, and this profile is similar to the Camden average (Christian 38.5%, No religion 29.1%). The Muslim faith is the second most practiced religion locally. For the Site area + and most of the areas surrounding the framework area the proportion of Muslim residents are lower than the Camden average of 13.8%. However, to the west of the framework area in Gospel Oak, the proportion of Muslim residents is higher (15.6%) than the Camden average.

There are several local church's belonging to various denominations of the Christian faith including Christ Apolystic Church to the north east of the framework area and St Martin's Church outside of the framework area, to the north west. Baitul Aman Mosque and Education Centre is outside of the framework area, to the west.

Disability / long term illness

Table 7: Long term sick or disabled, Census 2011

Long term sick or disabled	Site Area +	North	East	South	West	Camden
All People	2,988	4,667	5,906	6,336	9,897	219,861
Area (hectares)	43	36	38	42	57	2,180
All men aged 16-74	8.0%	5.1%	5.4%	5.8%	8.5%	4.8%
All women aged 16-74	4.1%	3.9%	4.5%	6.0%	6.6%	4.0%

The proportion of residents who are economically inactive living in and within close proximity to the framework area due to long term sickness or disability is similar to the borough wide proportion of 4.8% for men and 3.9% for women. This proportion does however noticeably increase when compared to the west of the framework area (Gospel Oak) with 8.5% of men and 6.6% of women who are economically inactive due to long term sickness or disability.

In autumn 2018 Camden Council opened the Greenwood Centre in Greenwood Place which is within the framework area. The Greenwood Centre is Camden's first community resource centre for independent living, led by disabled people, for disabled people. It is run by a consortium of Camden voluntary sector disability organisations and led by Camden Disability Action. Members include, Camden Carers Centre, Camden Family Members Reference group, Centre 404, Experts by Experience, Highgate Day Centre, People's Centre for Change and family carer representatives. The centre is used by approximately 200 people per day.

Lime Tree Gardens in Burghley Road to the north and within a reasonable walking distance to the framework area is a registered mental health care home with 24 beds and provide an integrated model of care, linking customers with the local statutory mental health services and into the local housing pathway.

Sexual orientation

Data on sexual orientation is not available for the relevant LSOAs.

The 2018 GP Patient Survey found that 9.3% of Camden residents surveyed identified as Lesbian, Gay, Bisexual or 'Other' – above the London average (5.7%) and the national rate (3.5%). This compares with figures from the 2017 Annual Population Survey that gives lower estimates for both London and England (3.2% and 2.7%). It is recognised that issues of non-response, and unwillingness

to disclose sexual orientation on surveys, can have an impact on estimates. To improve data in this area, the Office for National Statistics is planning to include a new voluntary question on sexual orientation for people aged 16 and over in the 2021 Census.

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

Gender reassignment

Data on gender reassignment is not available for the relevant LSOAs and borough wide. 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 living in the UK.

Pregnancy and Maternity

Data on pregnancy and maternity is not available for the relevant LSOAs.

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

Data on Marriage and Civil Partnership is not available for the relevant LSOAs.

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%).

Engaging Groups With Protected Characteristics

Throughout the development of the framework efforts were made to inform and engage all of the groups with protected characteristics mentioned and local organisations providing services to protected groups. Respondent demographics were monitored and methods were used to target groups who were underrepresented to get involved. This includes the Council participating in sessions to engage local young people via a workshop at Gospel Oak Primary School run by Camden Community Makers and having open discussions with young people aged 11 to 14 at Kentish Town Community Centre. The Council has also held conversations with the Greenwood Centre.

All consultation drop-in sessions were held in Kentish Town Library, which is a DDA compliant venue and familiar to local people. Text links were provided to engage local people who are deaf or hard of hearing. Engagement was also tailored to target specific groups including young people and people who required assistance. Officers were available at events and by a direct telephone number to talk to local people, which helped to overcome any communication barriers including language. Information could also be interpreted upon request.

ASSESSMENT OF THE IMPACTS

The framework provides guidance to:

Development and Land use

Create an innovative new neighbourhood. A richly layered and characterful place that is an exemplar for mixed-use. A place that works hard, with intensive industrial, commercial and creative activity, harmoniously provided alongside high quality homes that support a diverse local community.

Key objectives

Employment-led mixed use development

- Undertake a comprehensive approach to development to deliver transformative benefits to the area

- Provide a significant number of new jobs and increase commercial floorspace
- Provide innovative and sustainable industrial floorspace that achieves higher densities, allows for co-location of uses and supports the Central Activities Zone
- Grow the existing cluster of creative, cultural and tech industries
- Provide inclusive community facilities to support the local community
- Include cultural and entertainment uses that enrich and complement the existing offer of Kentish Town

A strong local economy

- Support the success of small, medium and start-up businesses with the right type of floorspace including affordable work space
- Deliver an ambitious training and employment strategy providing genuine opportunities for local people and tackling inequality

New homes that meet need

- Deliver 2,000 new homes across the area
- Prioritise affordable housing delivery
- Provide a mix of high quality homes that meet the needs of Camden's residents

How will the protected groups be affected by these objectives?

Providing a significant number and variety of new jobs, an ambitious training and employment strategy and affordable employment space will provide greater opportunities for the whole community within the working age bracket including all groups of people with protected characteristics. This will especially benefit 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).

This objective will also especially benefit people from Black, Asian and Minority Ethnic backgrounds as the unemployment rate of this group is higher than people from a White background and the rate varies considerably by ethnic group. In the 12 months to December 2019 the unemployment rate was highest for people from a Black, and Bangladeshi or Pakistani (8%) background. (House of Commons Briefing Paper, 2 June 2020).

This objective will also benefit local people with a disability who have a higher unemployment rate than people without a disability and who will potentially be able to access jobs and training closer to where they live or use services.

In addition providing more jobs, training and affordable employment space can help women to return to work after starting a family, the long term unemployed and older people who can face disproportionate employment discrimination.

Altogether, these objectives could raise the confidence and improve the physical and mental health of all local residents, could bring people together and further improve the social cohesion.

Maintaining existing businesses in Regis Road as far as possible and safeguarding the industrial area for industrial and warehouse uses values the existing working communities and helps to ensure all remain as far as possible and do not feel threatened by potential development. This will help to further improve the social cohesion and make it easier for new workers to settle.

Delivering the right types and mix of housing including affordable and social housing, and exploring innovative models that help meet the needs of Camden's residents will help to ensure the new neighbourhood has a diverse mix of residents and is a place for everyone. Through previous consultation diverse communities and continuing to celebrate and support diversity was the most commonly stated valued cultural strength and these objectives aim to strengthen this further. Homes will be built to living standards and be DDA compliant. All of these improvements will have a positive impact on the quality of life for all new residents and provide opportunities for suitably sized housing for the many families in Camden who are currently in overcrowded accommodation.

A comprehensive approach to development can ensure a strategic coordinated approach is taken to deliver the best outcomes for our communities including all groups of people with protected characteristics. This includes planning for and delivering the right inclusive community facilities that are needed to bring the greatest benefit to best support local people.

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

It is considered that these objectives will benefit everyone living, working and visiting the new neighbourhood including all groups of people with protected characteristics. There will be no disproportionate impact, direct or indirect discrimination as a result of these objectives.

Routes and connections

Create an interconnected neighbourhood that supports pedestrian and cycle movement and allows businesses to operate in a shared manner. An attractive public realm that is open to all and supports active travel that allows all age groups to experience and enjoy.

Key objectives

New and improved connections

- Remove the severance of the site and connect the new neighbourhood with Kentish Town Road, Gospel Oak and Hampstead Heath
- Use appropriate access points for high frequency servicing of industrial and commercial areas

Sustainable transport

- Address the local area priorities identified by Transport for London
- Create a walking and cycling neighbourhood that prioritises inclusive and active travel choices
- Improve connections to a range of public transport hubs around the area to ease pressure on Kentish Town station at peak hours
- Encourage use of electric vehicles and charging points to improve the area's air quality

An attractive and safe public realm

- Create healthy streets that prioritise pedestrian and cycle movement, promoting active travel options
- Deliver a public realm strategy to stitch the new neighbourhood into surrounding communities.

How will the protected groups be affected by these objectives?

All of these objectives will make the area easier, safer and more pleasant to get around by everyone including pregnant women, parents with young children, older people and people with a disability. This can improve the health and well-being of local people by tackling inactivity, isolation, mental health problems, and reliance on more expensive transportation.

Gospel Oak to the west and adjacent to the framework area has two of the most deprived LSOAs in Camden, which are in the top 15% in England. Opening a route to Gospel Oak in particular could increase footfall and bring more prosperity to Queen's Crescent where its historic market and local businesses, many of which have a significant number of minority ethnic workers and provide authentic ethnic foods, could benefit.

Having inclusive cycling infrastructure in place can encourage more people to use this method of transportation including local Black, Asian and Minority Ethnic 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.

With the opening of the Greenwood Centre in autumn 2018, more people with a range of disabilities including mobility, mental ill-health and autism are using the area. Not only can the framework's objectives improve accessibility it can also aim to make it easier for new routes to be understood and used by everyone.

Together, these measures including improving the public realm with multifunctional spaces will support social cohesion in a community that has told us in previous consultation that diverse communities and continuing to celebrate and support diversity is the most valued cultural strength that a new neighbourhood could enhance. By working with the Greenwood Centre can influence development of the public realm, routes and connections and ensure they are delivered with

specific requirement of people with disabilities in mind.

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

It is considered that these objectives will benefit everyone living, working and visiting the new neighbourhood including all groups with protected characteristics. There will be no disproportionate impact, direct or indirect discrimination as a result of these objectives.

Health and wellbeing:

Create a socially mixed place that builds on the distinctive community and character of Kentish Town, bringing residents, workers and visitors together with space and facilities to relax, play and interact enjoy cultural activities and events.

Key objectives

A sustainable neighbourhood

- Create a sustainable development that contributes towards the health and wellbeing of existing and new communities
- Create a zero emissions neighbourhood
- Improve air quality in Kentish Town

Open spaces and play

- Provide a range of size and types of publically accessible open spaces, including a significant amount of green space
- Deliver exciting, safe and integrated play space that creates a child friendly neighbourhood
- Enhance biodiversity across the neighbourhood by providing a range of habitat types
- Improve access to Hampstead Heath through new and improved walking and cycling routes

A thriving community

- Deliver health/education and community facilities that are required to meet anticipated population growth
- Deliver provisions and provide opportunities for young people
- Build on the strong cultural infrastructure already in place within Kentish Town to provide educational, leisure and entertainment opportunities for local people and visitors to enjoy
- Explore ways to reduce the number of barriers to lead a healthy life, as identified by the Council's Physical Activity Needs Assessment, 2019

How will the protected groups be affected by these objectives?

All of these objectives have the potential to greatly improve the health and well-being of new and existing communities including all groups of people with protected characteristics.

Improving the air quality is a priority for the local community especially as Kentish Town already suffers from some of the most polluted air in London. Providing measures to improve the air quality will greatly enhance the health and well-being for everyone who use the area particularly people who are likely to be there throughout the day. This will include parents with young children, people with a disability including users of services operating from the Greenwood Centre, local people with a long term illness, the elderly and economically inactive.

Providing more open spaces, spaces for play, increasing the biodiversity and providing easy walk/cycling access to Hampstead Heath will greatly improve the health and well-being for all new and existing communities and will help to tackle inactivity, isolation and improve mental health. The importance of green infrastructure and open space has been highlighted on an unprecedented scale since the COVID-19 pandemic.

Integrating play spaces into design can ensure children have safe spaces to play with their guardians close by and encourage activity in places that may usually be unused. This in turn will better their engagement with their immediate environment and have a positive impact on their well-being. Having a good viewing corridor to Hampstead Heath could help to improve the well-being for everyone including local people with a mobility impairment.

In previous consultation, local people asked for more health, education provision for all ages and community facilities including facilities for young people. Providing all of these facilities will ensure new and existing communities of all ages can access the community provisions they need locally. This can help to improve their health and well-being, encourage social integration and social cohesion. Education provision for all ages can help to tackle social isolation particularly for older people, refugees and asylum seekers who can be particularly vulnerable.

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

It is considered that these objectives will benefit everyone living, working and visiting the new neighbourhood including all groups with protected characteristics. There will be no disproportionate impact, direct or indirect discrimination as a result of these objectives.

Design and character

Seamlessly integrated and well-connected with surrounding neighbourhoods of Kentish Town, Gospel Oak and Dartmouth Park. An environmentally friendly place, where people walk and cycle and that draws the green character of Hampstead Heath through the urban neighbourhood connecting to Kentish Town high street.

Key objectives

A distinct new neighbourhood

- Create of a new vibrant mixed-use neighbourhood that has a distinct, richly layered character
- Deliver the three key moves: the Heath Line, Makers Lane and Regis Road
- Create a neighbourhood stitched into its context, connecting surrounding communities

Exceptional design quality

- Create an inclusive neighbourhood of exceptional design quality
- Create a legible and inclusive neighbourhood built around well considered streets and spaces
- Celebrate the area's industrial heritage
- Build up to a general height datum of eight storeys with some buildings going above this in suitable locations.

Innovative design solutions

Support the co-location of a variety of uses across the neighbourhood including industrial and residential uses.

- Develop innovative building typologies that can support the intensification of the neighbourhood to enable higher density, more efficient industrial buildings.

How will the protected groups be affected by these objectives?

In general, today's urban development runs the risk of being experienced as a burden on its diverse communities, leaving local communities to feel unprotected and vulnerable. Working with local communities throughout the development of the framework is invaluable and prevents people including groups with protected characteristics feeling excluded by ensuring that everyone who could be affected by development has their say and a sense of ownership in the future of the area. In addition the local

communities in Kentish Town many of whom have lived in the area for generations have a longstanding history, relationship and understanding of the area and its heritage.

Working with the local community and making effort to include groups with protected characteristics including working with the Greenwood Centre can encourage more people and community groups to participate in development that comes forward, continue to engage with the Council, engage with each other and ultimately enhance the social cohesion with existing and new communities. All of these factors combined will work towards creating an inclusive neighbourhood that can be used and enjoyed by existing and new communities, and one of exceptional design quality.

Having a vibrant mixed used neighbourhood that has a distinct, richly layered character will make the new neighbourhood stimulating and interesting to existing and new communities. Underpinning the development of the new neighbourhood by three key principles: The Heath Line, Makers Lane and Regis Road will add to the layers of character as each will be appealing in their own right and create opportunities for social mixing, diversity, social integration and social cohesion which will have a positive impact for everyone.

Having innovative design solutions can help to ensure that development responds effectively over time, can be used by the wide community for a variety of purposes and are efficient. This in itself can be of benefit to everyone including groups with protected characteristics.

Having a general height of 8 storeys with some buildings going above this in appropriate locations will ensure development is in keeping with the general heights of the area, make the area feel safer and support the existing viewing corridors. This will make the new neighbourhood more inviting and minimise the risk of it being intimidating. In addition low to mid rise buildings can provide more entrances from the street and overlooking which make an area feel safer and minimise opportunities for crime and anti-social behaviour. All of these factors can have a positive impact and make the area feel safer for new and existing communities' health and well-being including all groups with protected characteristics.

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

It is considered that these objectives will benefit everyone living, working and visiting the new neighbourhood including all groups of people with protected characteristics. There will be no disproportionate impact, direct or indirect discrimination as a result of these objectives.

Delivery

The Council has worked with the community to identify and prioritise infrastructure items in order to deliver the benefits of development within Kentish Town. In consultation the community told us that their top 6 infrastructure that they think are most important are:

- 1 A new pedestrian and cycle bridge over the railway connecting the Regis Road and Murphy sites
- 2 Walk/cycleway above the railway connecting the Murphy site directly to Kentish Town
- 3 Step free access at Kentish Town mainline and underground stations
- 4 Kentish Town public realm strategy including a potential civic square outside Kentish Town Station
- 5 Extension to the square by decking over the railwa
- 6 Additional eastern entrance to Gospel Oak station

Two important pieces of physical infrastructure identified are a new pedestrian / cycle bridge over the Midland Mainline railway and a walk / cycle way above the railway connecting the Murphy site directly to Kentish Town.

These are considered priorities in delivering the development at Kentish Town and will be key in unlocking the framework area and realising the benefits set out in the framework subject to further feasibility and viability testing.

Whilst infrastructure items have been categorised according to their relative importance in supporting growth, importance does not necessarily indicate the order in which they should be delivered. This will be dependent on a range of factors. The type, timing and location of development which generates its need; aspirations to prepare sites to encourage investment; the sources/levels of funding available; and the support received from stakeholders.

How will the protected groups be affected by these objectives?

Delivering all of these infrastructure items will make the area easier feel safer and more pleasant to use, spend time in and get around by everyone including pregnant women, parents with young children, older people and people with disabilities. In addition this will encourage more people to walk, cycle, access local public transport and get outdoors. Being outdoors and providing opportunities for social interaction can improve the health and well-being of local people as well as tackle inactivity, isolation and mental health problems.

Connecting the Regis Road and Industrial area via a walk / cycle way can help to increase footfall to connecting areas and access to local amenities including community centres, health and GP practices, shops, sports facilities and open spaces. Being able to access a wider variety of local amenities without the reliance on public transport will help to improve the health and well-being for all protected groups, encourage integration and social cohesion within the wider community and reduce reliance on expensive public transport.

Step free access to Kentish Town mainline and underground stations has been of prime importance to the local community and mentioned time again in consultation. The objective for development to deliver this will be of particular benefit to people who are less mobile including the elderly and people with a disability. This is especially relevant since the opening of the Greenwood Centre, which has over 200 people with a disability per day using services operating from the centre.

Development will be phased to cause minimal disruption to the local community including groups with protected characteristics.

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

Proposals that require construction / reconfiguring / improvements could affect residents from all of the protected groups in terms of noise, dust, increased traffic and movement of heavier vehicles into the area. People who are in or close to the framework area during the day are likely to be more affected and these may include young children, their parents, pregnant women and older people. Local residents with a disability and those who use the Greenwood Centre could also be affected.

Development could potentially bring more people into the area and this could put a strain on the infrastructure including school places, transport and community facilities. This could impact everyone including children and their parents, and people with a mobility impairment. The planning framework has considered and factored in these potential impacts.

Ntes 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)?

Overall it is considered that the proposed decision to adopt the Kentish Town Planning Framework will have a positive impact on the Council's duty to promote equality of opportunity and will help foster good relations between all local groups including groups with protected characteristics.

The planning framework recognises that development in Kentish Town presents an exceptional opportunity that could generate significant regeneration and growth benefits for existing and future communities. With significant redevelopment and change likely to take place in the area in the coming years, the Council wants to ensure a strategic and coordinated approach is taken to deliver the best outcomes for its communities and this is why the planning framework has been developed.

As demonstrated in Question 2 there are a number of specific objectives within the planning framework that help to foster good relationships between different groups in the community.

These include but are not limited to:

- Create an innovative new neighbourhood. A richly layered and characterful place that is an exemplar for mixed-use. A place that works hard, with intensive industrial, commercial and creative activity, harmoniously provided alongside high quality homes that support a diverse local community.
- Create an interconnected neighbourhood that supports pedestrian and cycle movement and allows businesses to operate in a shared manner. An attractive public realm that is open to all and supports active travel that allows all age groups to experience and enjoy
- Create a socially mixed place that builds on the distinctive community and character of Kentish Town, bringing residents, workers and visitors together with space and facilities to relax, play and interact enjoy cultural activities and events.
- The new neighbourhood will be seamlessly integrated and well-connected with surrounding neighbourhoods of Kentish Town, Gospel Oak and Dartmouth Park. An environmentally friendly place, where people walk and cycle and that draws the green character of Hampstead Heath through the urban neighbourhood connecting to Kentish Town high street.

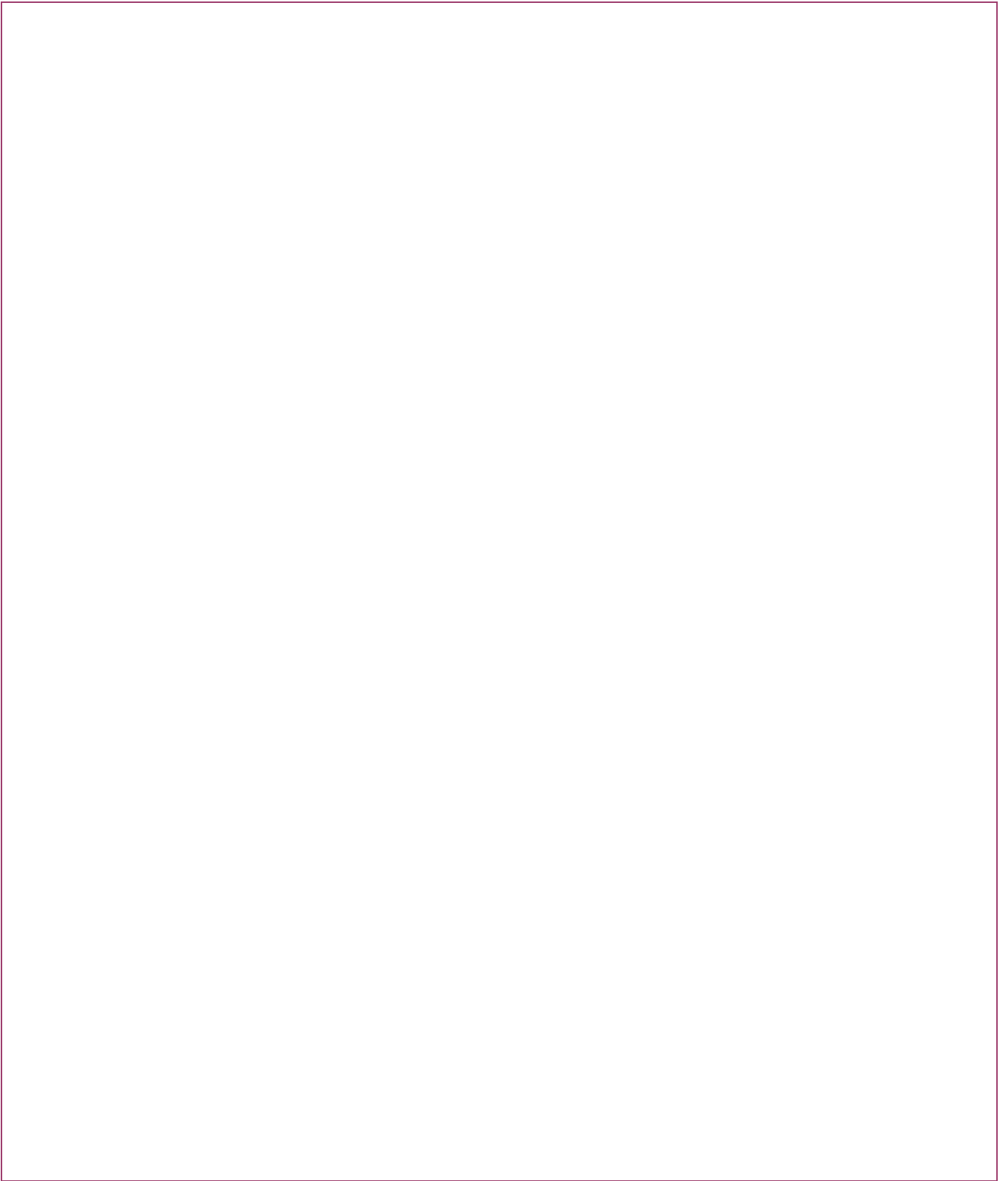
All of these objectives are considered to benefit the local communities including all groups with protected characteristics.

Providing guidance with an objective to deliver upwards of 2,000 new homes including affordable homes as well as providing employment opportunities for people of all ages and abilities will especially promote equality of opportunity for existing and new communities who can benefit from the positive impacts regeneration can bring.

The framework specifies that development at Kentish Town will be expected to foster links with the Greenwood Center to ensure that the center's users benefit from development. This will further help to ensure that the new neighborhood responds to the design needs of disabled people and is accessible and inclusive.

In consultation, a significant majority of respondents were in favour of having fewer vehicles in the area, reducing pollution and encouraging walking and cycling. Some groups including people who are less mobile, who have young children and are more car reliant could experience being negatively impacted by this.

Housing in the framework area will be expected to be car free (with the exception of a suitable proportion of disabled spaces). The framework aims to enhance accessibility to public transport provision, which would help to mitigate the impacts of car free development.



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?

Development of the planning framework has involved engagement and consultation with the local communities in the area. This has enabled us to explore the opportunities, collect ideas and develop the framework to reflect the community's ambitions for the area.

A significant majority of respondents to the consultation on the draft planning framework agree with the overall approach (80%), with most (45%) strongly agreeing.

In consultation some concerns were raised about the framework not especially mentioning segregated cycle lanes to protect cyclists and pedestrians from cyclists. This could make some of the groups with protected characteristics who walk and cycle including older people, children and parents with young children, and people with disabilities feel less assured that using these provisions will be safe. This could be avoided by providing more guidance on the cycle and walkways that should be delivered.

Having fewer vehicles including less parking spaces could impact people who are less mobile including older people and people with a mobility impairment, more than others. As mentioned in Question 3, the framework should enhance accessibility to public transport provision which would help to mitigate the impacts of car free development. Housing will be expected to be car-free (with the exception of a suitable proportion of disabled spaces).

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?

A planning framework is a planning document that guides development of an area where change is anticipated. It is not planning policy and does not make development happen, but is designed to influence and guide development when it comes forward.

It is intended that the Kentish Town Planning Framework will be adopted as a Supplementary Planning Document (SPD). SPDs support the development plan by providing additional advice and guidance about how its policies will be applied on particular topics or in specific areas of the borough.

The planning framework sets out a vision and strategy to guide future development within the Kentish Town area. The framework is a 'material consideration' when assessing planning applications and in decision-making.

The planning framework has been shaped by the communities that surround it and will have a key role in planning and coordinating development in this new neighbourhood. As outlined in 'Question 2' the objectives within the planning framework can advance equality of opportunity and foster good relations.

No part of the planning framework is considered to discriminate 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: 7 July 2020

EquIA checked by: Katrina Christoforou and Louise Regan

Date: 7 July 2020

EquIA approved by:



Date: 7 July 2020

(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

“

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

Lord Justice Dyson

”

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