

# **Camden Council Equality Impact Assessment Form**

# Camden Council Equality Impact Assessment Form

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

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

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

EqIAs help the Council to fulfil its legal obligations under the Equality Act’s public sector equality duty. The duty requires the Council to have due regard<sup>1</sup> to the need to:

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

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

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

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

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

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

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

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

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

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Title of the activity	
Camden Local Plan Proposed Submission Draft	
Officer accountable for the EqlA (e.g. director or project sponsor)	
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Person reviewing the EqlA (reviewer)	
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Version number and date of update	
5 February 2025	

## Step 1: Clarifying aims

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

- New  
 Under review  
 Being changed

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

- Staff  
 Residents  
 Contractors  
 Other (please detail):

### 1.c Which Directorate does the activity fall under:

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

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

The Local Plan is the Council's main planning document and provides the framework for planning decisions and managing development in the borough.

The current Camden Local Plan was adopted in 2017. The decision was taken in 2022 to begin a review of the Plan to update the Council's planning policies to ensure they are as effective as possible in achieving Camden's priorities and addressing the issues we face.

The new Local Plan will play an essential role in the delivery of the vision, ambitions, missions and challenges set out in We Make Camden, and includes a number of strategic objectives to achieve this. The strategic objectives of the Plan are:

- To ensure that development in Camden responds to the climate emergency by delivering zero carbon development, optimising resource efficiency, achieving the highest possible environmental standards, and requiring buildings and spaces to be designed and constructed to adapt to and reduce the effects of climate change.
- To increase the supply of homes to meet existing and future needs, with an emphasis on the provision of genuinely affordable homes. Self-contained housing is the priority use of the Local Plan.
- To make sure that development meets the needs of Camden's diverse communities and enables safe, strong, cohesive, open, resilient and multi-generational communities, to help reduce inequality and isolation in the borough, and support the provision of accessible facilities and services to meet community needs.
- To strengthen Camden's nationally important economy and maximise opportunities for Camden's residents, businesses and voluntary sector to contribute to and share in the success of Camden's economy, through local procurement, business support, education, training and skills.
- To ensure our town and neighbourhood centres are accessible and sustainable, to enhance their unique characters and support their varied roles as centres of trade, community activity, creativity, business, tourism and learning.
- To promote high quality, inclusive and sustainably designed development which protects resident's amenity, respects the unique character and history of Camden's neighbourhoods, celebrates and reflects the diversity of Camden's communities, and enables families to remain and thrive.
- To promote active and sustainable transport, where walking, wheeling and cycling are the safest and most convenient options, and reduce reliance on private cars, to reduce air pollution and improve health and well-being.
- To improve access to parks, green spaces and biodiversity, by protecting and enhancing existing assets and providing new green spaces and habitats.
- To reduce physical and mental health inequalities through good design and place making; improving access to nature; enabling affordable healthy food choices; supporting people to lead healthy and active lifestyles; and improving access to healthcare.

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The new Local Plan sets out the overarching development strategy for Camden over the period to 2041. The development strategy aims to address the long term needs of the borough and respond to the challenges it faces. It maximises the opportunities that exist for providing new homes and jobs, and the infrastructure required to support this, whilst seeking to ensure that development is delivered in a way that is socially and economically inclusive, environmentally sustainable and brings benefits to the borough and its residents. It provides the strategic framework and context within which the rest of the Plan has been developed.

The Plan takes an area-based approach to support and guide the delivery of development in the borough, with dedicated policies on South Camden, Central Camden, West Camden and North Camden. Within each area, site allocations have also been identified, in accordance with the Council's development strategy, to deliver new homes, jobs, open space, health and community facilities, leisure, retail and recreation opportunities, together with necessary infrastructure.

The Plan also includes a suite of topic-based policies, which set out the Council's proposed approach to:

- Housing: this chapter includes policies relating to maximizing housing supply; the provision of affordable housing; meeting the housing needs of specific groups; and housing choice and mix.
- Climate change: this chapter includes policies relating to prioritising the re-purposing, refurbishment and re-use of buildings over demolition; energy reduction in existing buildings; delivering zero carbon development; minimizing waste and prioritising the re-use of resources; promoting a circular economy; reducing whole life carbon emissions; and managing flood risk.
- Local economy: this chapter includes policies relating to the delivery of a successful and inclusive economy; affordable workspace provision; the provision and protection of offices; industrial land; hotels and tourism; retail and town centres; markets; hot food take-aways, betting shops and delivery led food businesses.
- Communities: this chapter includes policies relating to improving health and wellbeing; delivering access for all; the protection and enhancement of social and community infrastructure; the protection and provision of open space; food growing; the protection and enhancement of cultural facilities and the protection of public houses.
- Natural Environment: this chapter includes policies relating to the conservation and enhancement of the natural environment; delivering biodiversity enhancements; tree planting and protection; and protecting water quality.
- Design: this chapter includes policies relating to achieving design excellence; tall buildings; the design of housing; extensions and alterations; heritage; basements; shopfronts; and advertisements.
- Amenity: this chapter includes policies relating to protecting amenity; safety and security; noise pollution and air quality.
- Sustainable Transport: this chapter includes policies relating the delivery of safe, healthy and sustainable transport; prioritising walking, wheeling and cycling; public transport; shared transport services; parking and car-free development; and the sustainable movement of goods services and materials.

The Local Plan has to be prepared in accordance with relevant legislation. Once adopted, the new Plan will replace the Camden Local Plan 2017 and will form the basis for the Council's planning decisions.

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## Step 2: Data and evidence

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

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

What will the impact of the changes be?

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

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

- Age
- Disability, including family carers<sup>2</sup>
- Gender reassignment<sup>3</sup>
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

<sup>2</sup> This is the legal term in the Equality Act. In practice there are specific legal protections for a diverse range of people who have physical, mental and sensory impairments, long-term health conditions and/or neurodivergence, as well as carers who provide unpaid care for a friend or family member who cannot function without their support. Census and local datasets use the Equality Act definition and will include people who may not use the language of disability to describe themselves.

<sup>3</sup> This is the legal term in the Equality Act. In practice there are specific legal protections for anyone whose gender identity does not match the sex they were assigned at birth. This means, for example, that people who are trans and people who are non-binary or gender fluid are considered a specific protected group under the Equality Act.

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## Age

According to the ONS mid-year estimates 2023, Camden has a resident population of 220,903 people.

Camden is a relatively young borough, with a large population of students and young people living in the area: 43% of residents are aged under 30, and two-thirds are aged under 45. The average age in Camden is 37.2 years, compared to 37.5 in London and 41.2 nationally

Camden's demographic profile corresponds to that of a typical metropolitan city with a university presence, whereby there is a large proportion of students and younger adults, and relatively few children and older people compared to the national average.

There are 11 higher education institutions in Camden. The student population is the 3rd largest in London, with 29,965 higher education students living in Camden, of which 56% are from overseas.

Table 1: Age range proportions – ONS mid-year estimates 2023

Age	Camden
0 – 4 years	4.5%
5 – 14 years	9.1%
15 – 24 years	18.8%
25 – 44 years	34.0%
45 – 59 years	17.4%
60 – 74 years	10.7%
75 – 84 years	4.0%
85 + years	1.4%

## Disability, including family carers

The 2021 Census reports that 15.2% of residents in Camden have a disability or long-term condition that limits their day-to-day activities. This compares to 13.2% of the London population and 17.3% of the population in England. This is the 2nd highest proportion amongst London boroughs and is higher than the London average. Camden also had a higher proportion of people in bad or very bad health (5.1%) compared to the rest of London, where the average was 4.3%. The proportion of people providing unpaid care in Camden is 7.3%, the 7th highest in London and slightly above the London average (7.2%).

## Gender reassignment

Data on gender reassignment is not available at a borough level.

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The 2021 Census included a new question on gender identity, which asked whether people had the same sex as at birth. In Camden 91% of people had the same sex as at birth. There were 0.3% of people who had a different sex from birth but gave no specific identity; 0.1% identified as Trans woman, 0.1% as Trans man; and 0.2% with other gender identities, with the rest of respondents not providing an answer to the question.

## Marriage and civil partnership

The 2021 Census found that 43% of people in Camden aged 16+ lived as couple, either in a same sex or opposite sex married/civil partnership, or cohabiting.

## Pregnancy and maternity

In the year to mid-2022 there were 2,194 births recorded to Camden-resident mothers. Since mid-2012, annual births in Camden have reduced by -29%. While this is part of a wider national (-15%) and London (-18%) trend, Camden has seen the 5th largest percentage fall in births over the last decade in London. Camden has a low fertility rate, but it is not possible to say exactly what the fertility rate is until it has been recalculated using the latest population data. Factors contributing to low fertility include the borough's large student population, and the high cost of family accommodation, alongside other factors including welfare reform, short-term letting, and economic uncertainties.

## Race

Camden's population is ethnically diverse. In 2021, 40% of Camden residents were from Black, Asian or other minority ethnic groups (increased from 27% in 2001; 34% in 2011) compared to 46% in London and 19% across England.

A further 24.1% were non-British White residents including those from the EU, other Europe and the rest of the world. In 2021-22, figures for Camden-resident overseas nationals requesting National Insurance numbers to work in the UK show that 40% were from Europe, 38% from Asia and 22% from the rest of the world.

According to the 2021 Census ethnic group categorisation, Black African forms the largest minority ethnic group in seven Camden wards; Bangladeshi the largest minority in six, Chinese in one and Indian in one. Camden's largest communities with a distinctive cultural identity are the Bangladeshi, Indian, Chinese, Somali and Arab communities.

The most commonly spoken languages other than English in Camden were French (10%); Bengali (9%); Spanish (8%); Italian (7%); Arabic and Portuguese (5%); Somali and Greek (4%); and Albanian (3%).

Table 2: Ethnicity, Census 2021

Detailed Ethnic Groups	Camden Census 2021
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	210,100
<b>White</b>	
English/Welsh/Scottish/N Irish/British	35.4%
Irish	2.7%
Gypsy or Irish Traveller	0.1%
Roma	0.5%
Other White	21.1%
<b>Mixed / Multiple Ethnic Groups</b>	
White & Black Caribbean	1.2%
White & Black African	1%
White & Asian	2%
Other Mixed	2.4%
<b>Asian / Asian British</b>	
Indian	3.3%
Pakistani	0.8%
Bangladeshi	6.8%
Chinese	3.2%
Other Asian	4.0%
<b>Black / African / Caribbean / Black British</b>	
African	6.8%
Caribbean	1.3%
Other Black	1%
<b>Other ethnic group</b>	
Arab	2.1%
Any Other Ethnic Group	4.7%

## Religion or belief

Camden's population comprises a diversity of religions and beliefs. At the 2021 Census, 31.4% of people described themselves as Christian, 16.1% were Muslim, 4.8% were Jewish, 2% Hindu, 1% Buddhist and 34.6% stated that they have no religion. Camden has a higher proportion of people of Muslim and Jewish faith, and those who have no religion, than London as a whole and the rest of the UK.

## Sex

Camden's population is currently 46.7% male and 53.3% female (mid-year estimates 2023). Camden has a slightly lower proportion of males compared with London or the UK (48.6% and 49%). In Camden, the proportion of men is highest in the 25- 44 age group, where they comprise 34% of the population.

## Sexual orientation

Statistics about the size of the Lesbian, Gay and Bisexual (LGB) population vary considerably and there is no single accepted measure.

In Camden, 82.6% of residents identified as straight/heterosexual compared to 89.4% in England and 86.2% in London. 3.7% identified as gay or lesbian (2.2% in

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London and 1.5% in England), 2.5% as bisexual (1.5% in London and 1.3% in England).

## **Intersectional Groups**

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

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

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

## **Foster Carers**

The latest Department of Education figures show that at the end of March 2024 120 children were in foster care, compared with 121 at the end of March 2023. Of the 120 children who were placed with foster carers:

- 36 were carers from independent / voluntary agencies, or other local authority carers
- 16 were parents or other persons with parental responsibility.

## **Looked after children / care leavers**

The latest 'children looked after' numbers and rates from the Department for Education shows that on 31 March 2024 there were 214 children looked after by Camden.

The data also shows that 118 children ceased to be looked after during 2023/24.

## **Low-income households**

Households are considered to be in low income if they live on less than 60% of the median income. In Camden 60% of median income (i.e. £41,342) is £24,806 and 21.7% of households have an income less than this. This compares with 33.1% of households considered to be low income nationally and 27% in Greater London.

## **Refugees and asylum seekers**

Over the past few years, Camden has become a home for over 800 Ukrainian refugees, as part of the Homes for Ukraine scheme, 1,800 Afghan refugees have been supported by Camden teams, and 109 former Syrian refugees were supported to apply for UK citizenship. The Council's monitoring shows that, in the first quarter of 2023, 603 people arrived under the homes for Ukraine scheme, bringing the total cohort of people from Ukraine to 1,294.

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

At the end of July 2023, the size of the Afghan refugee cohort in Camden remained at 212 service users.

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

At the 2021 Census, 11.9% of households in Camden contained couples who were married or in civil partnerships who had dependent children (compared to 14.3% nationally and 15.8% in Greater London). 6.4% of households were lone parent families with dependent children (compared to 4.5% nationally and 3% in Greater London), and 1.9% were co-habiting couples with dependent children (compared to 6.9% nationally and 7.8% in Greater London).

## **People who are homeless**

The rough sleeping snapshot produced by the Government shows that over the period from 2013 to 2023 the total number of people sleeping rough in Camden was 724 people. This is the second highest figure in London, after Westminster, who recorded a total of 2,742 rough sleepers over the same period.

## **Private rental tenants in deprived areas**

Private renters make up 36% of the housing market in Camden, higher than the UK but in line with other Inner London Boroughs.

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

No specific information on private rental tenants in deprived areas could be obtained.

## **Single parent households**

At the 2021 Census, 5,945 households in Camden (6.4%) were lone parent families with dependent children (compared to 4.5% nationally and 3% in Greater London).

## **Social housing tenants**

At the 2021 Census, 31,250 households in Camden lived in social rented accommodation (37.7%, compared to 17.1% nationally and 23.1% in Greater London). There are currently over 7,600 households on the waiting list for social housing in Camden.

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Please note: The 2021 Census was undertaken during COVID-19 lockdown/restrictions. Many people and households usually present in Camden were elsewhere at this time and therefore will not be recorded in the 2021 Census data.

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

Data or evidence about intersectionality could not be determined from the responses to the Census 2021.

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## Step 3: Impact

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

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

### 3.a Potential negative impact on protected characteristics

Protected Characteristic	Is there potential negative impact? (Yes or No)	Explain the potential negative impact
Age	Yes	The current Local Plan includes a policy that expects development to be car-free, and we are proposing to retain this in the new Local Plan. This is in line with the approach taken in the Council's Transport Strategy. A small number of older people and young families in areas of lower public transport provision may be negatively affected by this policy (T5). These people are likely to be less mobile and therefore more reliant upon car use.
Disability including carers	No	The Local Plan is not expected to have a negative impact in relation to this protected group.  Disabled people will remain unaffected by policy T5 on car-free development as spaces designated for disabled people can be provided under this policy.
Gender reassignment	No	The Local Plan is not expected to have a negative impact in relation to this protected group.
Marriage/civil partnership	No	The Local Plan is not expected to have a negative impact in relation to this protected group.

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Protected Characteristic	Is there potential negative impact? (Yes or No)	Explain the potential negative impact
Pregnancy / maternity	No	The Local Plan is not expected to have a negative impact in relation to this protected group.
Race	No	The Local Plan is not expected to have a negative impact in relation to this protected group.
Religion or belief	No	The Local Plan is not expected to have a negative impact in relation to this protected group.
Sex	No	The Local Plan is not expected to have a negative impact in relation to this protected group.
Sexual orientation	No	The Local Plan is not expected to have a negative impact in relation to this protected group.



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## 3.b Potential positive impact on protected characteristics

The Local Plan Proposed Submission Draft sets out our proposed approach to delivering healthy and sustainable development, and seeks to ensure that development makes a positive contribution to the borough, to deliver the vision and objectives of the Local Plan, the ambitions, missions and challenges of We Make Camden, and the Good Life Camden framework.

The Plan seeks to ensure that all development in Camden is inclusive, accessible, safe and welcoming to meet the needs of the borough’s diverse communities (Policy DS1), which should benefit everyone.

The Plan also contains policies relating to climate change, managing flood risk, meeting housing needs, supporting high streets and town centres, delivering a sustainable and inclusive economy, supporting Camden’s communities, the natural environment, design and heritage, ensuring access for all, protecting amenity, and safe, healthy and sustainable transport, which should benefit all of Camden’s diverse communities.

Below is a summary of the potential positive impacts that the Plan will have on protected characteristics.

Protected Characteristic	Is there potential positive impact? (Yes or No)	Explain the potential positive impact
Age	Yes	<p>The Plan includes a number of site allocations to support the delivery of new homes and jobs, which should benefit people of all ages. Furthermore, some sites have also been allocated to support the delivery of student accommodation and some sites have been allocated to support the delivery of housing for older people, which should benefit younger people and older people alike.</p> <p>Policy D3 (Design of Housing) requires:</p> <ul style="list-style-type: none"> <li>• 90% of new-build self-contained homes in each development to be accessible and adaptable in accordance with Building Regulation M4(2);</li> <li>• 10% of new-build self-contained homes in each development to be suitable for occupation by a wheelchair user or easily adapted for occupation by a wheelchair user in accordance with Building Regulation M4(3).</li> </ul> <p>This should benefit older people, as it requires housing to be designed to be accessible and easily adaptable, to enable people to adapt their homes to meet their needs, so that people can live in their homes for as long as possible as they grow older and the majority of wheelchair users are over 60.</p>

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	<p>The Plan also includes policies to meet the housing needs of older people, homeless people, vulnerable people and students which should benefit younger and older people (Policies H6, H8 and H9). In addition to this, Houses in Multiple Occupation (HMOs) are also promoted and protected by policy H10. HMOs are composed of residential units with shared facilities (such as kitchens and bathrooms) and generally can be rented at a lower cost than self-contained dwellings. Housing of this type provides an important source of accommodation for young people.</p> <p>Policy IE1 (Growing a sustainable and inclusive economy) also sets out the Council's strategy for supporting the delivery of a sustainable and inclusive economy. The policy approach taken supports local business start-ups, entrepreneurs and residents seeking work to access jobs, skills, education and training opportunities by maximising benefits during the planning, construction and end user phases, including the provision of education and training contributions. The provision of more jobs and training could especially benefit young people, who can struggle to find work, in terms of helping them access greater employment opportunities.</p> <p>Policy SC2 (Access for all) states that we will expect all buildings and places to meet the highest practicable standards of accessible and inclusive design so they can be used safely, easily and with dignity by all. This could benefit people of all ages, especially older people, as it will help ensure that buildings and spaces are designed to meet their varied needs. It should also ensure that buildings and spaces are more accessible, which will benefit older people, who are more likely to have mobility issues, and younger families.</p> <p>The Plan seeks to protect and enhance open space provision in Camden (Policy SC4). The impact of open space deficiencies are most greatly felt in higher density residential areas with higher numbers of children. The protection and addition of open space will increase opportunities for safe play and exercise. Increasing access to open space should also benefit residents' mental health, encourage people to socialize and reduce feelings of loneliness and isolation, which can sometimes affect older people.</p> <p>The Plan also provides guidance on both the design of</p>
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	<p>open spaces and the design of public spaces to ensure they are designed to be safe, welcoming, inclusive and accessible for all, which should benefit people of all ages (see Policies D1, SC2 and SC4). Policy D1 (Achieving design excellence) which covers the design of public spaces also makes reference to the provision of covered resting places and street furniture including benches, which should benefit both older people and younger people, in a number of ways by providing space to rest if needed and also space to meet with others outdoors which should help address feelings of social isolation. Policies D1, SC2 and SC4 also refer to the need to provide public toilets, suitable for a range of users, where appropriate. Public toilets are a vital facility and are especially important for certain groups including disabled people, older people, people with babies and young children, pregnant women and people with particular health conditions. Promoting access to public toilets should benefit people of all ages, particularly older people and young families, as it gives people more confidence to move around the Borough and spend more time in a place or space.</p> <p>In recognition of Camden's growing older population, the Plan also strongly encourages the inclusion of dementia-friendly design in housing and mixed-use development schemes (policy SC2), recognising that design can have an impact on the ease with which people with dementia are able to navigate around or through an area by lighting (avoiding deep shadows), materials, clear signage, distinctive buildings and use of colour.</p> <p>The Plan seeks to protect and enhance the provision of both social and community infrastructure (Policy SC3) and cultural and arts facilities (Policy SC6), which could benefit people of all ages, in particular younger people and older people as these venues and spaces are highly valued by the different groups they serve and have often been designed or adapted to serve the distinct needs of the group or community. The policy on Social and Community Infrastructure also makes reference to the fact that new facilities should be designed to meet the needs of all and that they should include publicly accessible toilets, including Changing Places toilets, where appropriate, and baby change facilities. This provision should particularly benefit older people and young families who sometimes find it difficult to access public conveniences that meet their needs.</p>
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		<p>Policy SC3 (Social and Community Infrastructure) also covers the provision of sports facilities in Camden, which should provide particular benefits for young people by creating more opportunities to learn sports skills to assist leading healthier, more active lifestyles.</p> <p>Policies T1 and T2 (Safe, Healthy and Sustainable Transport and Prioritising Walking, Wheeling and Cycling) support improvements to streets, in line with the Mayor's Healthy Streets Approach, to make it easier for people to move around, which should support those with mobility issues, who are more likely to be older people. The Plan also seeks to support the provision of step-free access at stations and identifies where contributions will be sought from specific sites to help deliver this, which should also benefit those with mobility issues, who are more likely to be older people. Policy T3 (Public Transport) states that the Council will seek contributions towards the improvement of the bus network. This policy will be of particular benefit to young people and older people whom are more likely to be reliant on buses. Policy T5 (Parking and car-free development) will also help limit the opportunities for parking within the borough and help reduce car ownership and use and therefore lead to reductions in air pollution, which could benefit older and younger people, as air pollution can have a particularly harmful impact on the health of these groups.</p> <p>The approach to the historic environment in the Plan set out in Policy D5 recognizes that older buildings were generally not built with the interests of people who may have mobility issues in mind. To mitigate this, the Plan states that where listed buildings and their approaches are being altered, disabled access should be considered and incorporated to improve accessibility which will especially benefit anyone who has mobility issues, including older people.</p> <p>The Plan states that new and altered shopfronts should be designed to be fully accessible for all, which should benefit older people who may have mobility issues, in accessing shops and facilities (see Policy D8).</p> <p>Policy IE7 (Hot Food Takeaways) seeks to restrict the location of hot food takeaways so that they cannot be located within 400m of schools. Research suggests that proximity to energy-dense fast food is one of a</p>
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		<p>number of contributing factors to childhood obesity. The policy should therefore provide health benefits for young people by discouraging unhealthy eating habits.</p> <p>Policy IE8 (Gambling Uses) seeks to restrict the location of gambling uses so that they cannot be located within 400m of schools. Whilst children and young people (under-18s) are unlikely to gamble in betting shops, displays in shop windows are highly visible to young people and this exposure makes young people who already gamble increase their gambling activity (even if this is not in the betting shop itself). This policy should therefore have a positive impact for young people.</p> <p>To create a safer borough for all, the Plan requires development to be designed, managed and maintained to create an inclusive environment that avoids or minimises real and perceived danger as far as possible. It acknowledges and responds to the fact that different groups within the population use spaces, and perceive what is safe, differently (Policy A2). The policy also sets out a number of criteria to guide the design of developments to ensure they are safe and secure for example by promoting overlooking of public spaces, providing effective lighting, and ensuring there are active spaces and frontages at the ground floor. This should benefit people ages, especially younger and older people, who may feel more vulnerable using public spaces, particularly at certain times of the day.</p> <p>Policy A3 (Air Quality) seeks to mitigate against the impact of development on air quality and ensuring that exposure to poor air quality to new development is reduced. The main pollutants of concern are NO<sub>2</sub>, PM<sub>10</sub>, PM<sub>2.5</sub> and dust. Long term exposure to these pollutants is linked to cancer, heart disease, reduced lung function and respiratory disease. The policy has particular benefits for young and elderly people who have been identified as particularly sensitive to health problems caused by air pollution.</p>
Disability including carers	Yes	Policy SC2 (Access for All) of the Local Plan seeks to ensure that developments are designed to promote access and inclusion, and that the barriers which prevent everyone from accessing facilities and opportunities are removed. The policy states that the Council will expect:

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		<ul style="list-style-type: none"><li>• all buildings and places to meet the highest practicable standards of accessible and inclusive design so they can be used safely, easily and with dignity by all.</li><li>• development to avoid street clutter and ensure that street furniture, including phone boxes and advertisements, is located to allow the unobstructed movement of people, wheelchairs, mobility scooters and pushchairs.</li><li>• the provision of water fountains and free publicly accessible toilets suitable for a range of users.</li><li>• major developments, and those providing new public space, to consider the sensory needs of neurodiverse people and, where appropriate, make provision for quiet areas that are safe, welcoming and accessible;</li><li>• play areas to be designed and constructed to meet the physical and sensory needs of d/Deaf, disabled, blind and neurodiverse children and teenagers.</li></ul> <p>Many people experience difficulties in using buildings and accessing public spaces as their access needs are either ignored or considered too late in the development process to ensure inclusive design principals are included. This policy should have a positive impact on disabled people, and their carers, as it sets out the measures that developers should consider in the design of buildings and spaces to make them more accessible and inclusive. The Policy also recognises that public toilets are a vital facility for certain groups including disabled people, older people, people with babies and young children, pregnant women and people with particular health conditions. Promoting access to public toilets should particularly benefit disabled people and their carers, as it gives people more confidence to move around the borough and spend more time in a place or space. Furthermore, the Policy also recognises the need to design places / spaces to meet the needs of neurodiverse people who can often experience sensory overwhelm when navigating streets and spaces due to noise.</p> <p>The Plan seeks to maximise the supply of housing in the borough, including affordable housing, and allocates sites to deliver new homes (Policy H1 and Policy H4 and site allocation policies). Policy D3 (Design of Housing) also requires:</p>
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	<ul style="list-style-type: none"><li>• 90% of new-build self-contained homes in each development to be accessible and adaptable in accordance with Building Regulation M4(2);</li><li>• 10% of new-build self-contained homes in each development to be suitable for occupation by a wheelchair user or easily adapted for occupation by a wheelchair user in accordance with Building Regulation M4(3);</li></ul> <p>Furthermore, Policy D4 (Extensions and Alterations) supports residents to extend and alter their homes, subject to meeting a number of requirements, and Policy H8 seeks to meet the housing needs of older people, homeless people and other people with care or support requirements. These policies should benefit disabled people, and carers, as they will help deliver housing that better meets people's needs.</p> <p>The Plan sets out the Council's approach to achieving excellence in design. Policy D1 states that we will expect development to be designed to –</p> <ul style="list-style-type: none"><li>• be functional and take into account the proposed use and needs of the expected occupants of the building, and other users of the space.</li><li>• Be flexible and adaptable to meet the needs of future users and occupiers.</li></ul> <p>This should benefit disabled people and carers, as it will help ensure that buildings and spaces are designed to meet their varied needs. It should also ensure that buildings and spaces are more accessible to disabled people, and carers through the inclusion of measures such as wheelchair access, step-free routes, way-finding and non-slip surfaces.</p> <p>The Plan provides guidance on the design of open space (Policy SC4) and public spaces (Policy D1) to ensure they are designed to be safe, welcoming, inclusive and accessible for all, which should benefit disabled people, and carers. The approach to the design of public spaces also seeks to ensure that they celebrate and reflect the diversity of the communities they are within, through high quality interpretation, events, public art and decorative features co-designed with local people, to ensure that new spaces are inclusive and meet the needs of the communities they serve, which could also benefit disabled people, and carers. Policy D1 which covers the design of public spaces also makes reference to the provision of covered resting places, quiet places and street furniture including benches, which should benefit</p>
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		<p>disabled people, people with mobility issues, neurodiverse people, and carers in a number of ways by providing space to rest if needed and also space to meet with others outdoors. This should help address feelings of social isolation. Quiet spaces should also benefit neurodiverse people who can experience sensory overload in busy public areas.</p> <p>The Plan seeks to protect and enhance the provision of both social and community infrastructure (Policy SC3) and cultural and arts facilities (Policy SC6), which could benefit disabled people and carers as these venues and spaces have often been designed or adapted to serve the distinct needs of the group or community. The policy on Social and Community Infrastructure also makes reference to the fact that new facilities should be designed to meet the needs of all and that they should include publicly accessible toilets, including Changing Places toilets where appropriate, and baby change facilities, which could also benefit disabled people and carers, who sometimes find it difficult to access public conveniences that meet their needs.</p> <p>The Plan seeks to support the provision of step-free access at stations and identifies where contributions will be sought from specific sites to help deliver this. This should benefit disabled people who use a wheelchair / have mobility issues and carers who are currently either unable to access, or have difficulties accessing, some stations in Camden. The Plan has also been updated to include reference to the need to prioritise walking, wheeling and cycling, recognizing the need for our streets and cycleways to be designed to accommodate people who use wheelchairs (Policy T2). This should benefit disabled people who use a wheelchair and carers.</p> <p>The approach to the historic environment in the Plan set out in Policy D5 recognizes that often, older buildings were not built with the interests of disabled people in mind. To mitigate this, the Plan states that where listed buildings and their approaches are being altered, disabled access should be considered and incorporated to improve accessibility which will provide benefits for disabled people.</p> <p>The Plan states that new and altered shopfronts should be designed to be fully accessible for all, which should benefit disabled people and carers in accessing shops and facilities (see Policy D8).</p>
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		<p>To create a safer borough for all, the Plan requires development to be designed, managed and maintained to create an inclusive environment that avoids or minimises real and perceived danger as far as possible. It acknowledges and responds to the fact that different groups within the population use spaces, and perceive what is safe, differently (Policy A2). The policy sets out criteria to guide the design of developments to ensure they are safe and secure, for example by promoting overlooking of public spaces, providing effective lighting, and ensuring there are active spaces and frontages at the ground floor. This should benefit disabled people and carers, who may feel vulnerable using public spaces, particularly at certain times of the day.</p> <p>The Plan requires development to be designed to promote good health and well-being; provide a healthy living and working environment; support healthy and active lifestyles; be safe and accessible for all; promote social and economic inclusion; and support the provision of new and improved health facilities (Policy SC1). This could benefit disabled people and carers, as the policy aims to improve the health of the population and ensure that healthcare facilities are provided to meet the needs of all.</p>
Gender reassignment	Yes	<p>The Plan provides guidance on the design of open space (Policy SC4) and public spaces (Policy D1) to ensure they are designed to be safe, welcoming, inclusive and accessible for all, which should benefit people with this protected characteristic, who may feel more vulnerable or unsafe using certain spaces, particularly at certain times of the day. The approach to the design of public spaces also seeks to ensure spaces celebrate and reflect the diversity of the communities they are within, through high quality interpretation, events, public art and decorative features co-designed with local people, to ensure that new spaces are inclusive and meet the needs of the communities they serve, which could benefit people with this protected characteristic.</p> <p>The Plan seeks to protect and enhance the provision of both social and community infrastructure (Policy SC3) and cultural and arts facilities (Policy SC6), which are highly valued by the various groups and individuals they serve. The Plan's approach could therefore benefit people with this protected characteristic.</p> <p>The Plan sets out requirements for development to</p>

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		<p>contribute to the delivery of 'Healthy Streets' that are designed to be safe, inclusive and accessible for all (Policy T1). The policy approach to prioritising walking, wheeling and cycling also requires development to be designed to be safe and easy to move through, adequately lit, inclusive and meet the needs of all pedestrians (Policy T2). These policies could benefit people with this protected characteristic, who may feel vulnerable walking around the borough, particularly at certain times of the day.</p> <p>To create a safer borough for all, the Plan requires development to be designed, managed and maintained to create an inclusive environment that avoids or minimises real and perceived danger as far as possible, and acknowledges and responds to the fact that different groups within the population use spaces, and perceive what is safe, differently (Policy A2). The policy also sets out criteria to guide the design of developments to ensure they are safe and secure, for example by promoting overlooking of public spaces, providing effective lighting, and ensuring there are active spaces and frontages at the ground floor. This should benefit people with this protected characteristic who may feel more vulnerable using public spaces, particularly at certain times of the day.</p> <p>The Plan requires development to be designed to promote good health and well-being; provide a healthy living and working environment; support healthy and active lifestyles; be safe and accessible for all; promote social and economic inclusion; and support the provision of new and improved health facilities (Policy SC1). This could benefit people with this protected characteristic who may be more likely to experience health inequalities and come up against barriers when trying to access health care.</p>
Marriage/civil partnership	Yes	The Plan seeks to maximise the supply of housing in the borough, including affordable housing, and allocates sites to deliver new homes (Policy H1 and Policy H4 and site allocation policies). This should benefit people who are married or in a civil partnership in terms of providing greater choice and flexibility in the housing market, to meet their housing needs.
Pregnancy / maternity	Yes	Policy IE1 (Growing a sustainable and inclusive economy) seeks to address barrier to work, such as the provision of childcare facilities to support working

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	<p>families, which should benefit people with this protected characteristic.</p> <p>Policy D4 (Extensions and Alterations) supports residents to extend and alter their homes, subject to meeting a number of requirements, which could benefit people who are pregnant or who have babies, as it will enable them to extend their homes to accommodate growing families and address issues of overcrowding.</p> <p>The Plan states that new and altered shopfronts should be designed to be fully accessible for all, which should benefit people with prams, strollers etc. in accessing shops and facilities (see Policy D8).</p> <p>The Plan provides guidance on the design of open space (Policy SC4) and public spaces (Policy D1) to ensure they are designed to be safe, welcoming, inclusive and accessible for all, which should benefit people who are pregnant or who have babies, who may feel more vulnerable or unsafe using certain spaces, particularly at certain times of the day. Policy D1 which covers the design of public spaces also makes reference to the provision of street furniture including benches, which should benefit people who are pregnant or who have babies, who may need to rest or feed their baby.</p> <p>Policy SC2 of the Plan seeks to ensure that developments are designed to promote access and inclusion, and that the barriers which prevent everyone from accessing facilities and opportunities are removed. The policy states that the Council will expect:</p> <ul style="list-style-type: none"><li>• all buildings and places to meet the highest practicable standards of accessible and inclusive design so they can be used safely, easily and with dignity by all.</li><li>• development to avoid street clutter and ensure that street furniture, including phone boxes and advertisements, is located to allow the unobstructed movement of people, wheelchairs, mobility scooters and pushchairs.</li><li>• ensure that water fountains and free publicly accessible toilets suitable for a range of users.</li></ul> <p>Furthermore, Policy T1 sets out requirements for development to contribute to the delivery of 'Healthy Streets' that are designed to be safe, inclusive and accessible for all (Policy T1). These policies should benefit people who are pregnant or who have babies, as it should make it easier to move around and access</p>
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	<p>buildings and spaces, either while pregnant, or when pushing a buggy.</p> <p>The Plan seeks to protect and enhance the provision of both social and community infrastructure (Policy SC3) and cultural and arts facilities (Policy SC6), which are highly valued by the various groups and individuals they serve. The Plan's approach could therefore benefit people who are pregnant or who have babies. Pregnant people often access community facilities for antenatal classes or to use community midwife services. People who have recently given birth may access children's centres and / or baby classes at local libraries or community centres.</p> <p>To create a safer borough for all, the Plan requires development to be designed, managed and maintained to create an inclusive environment that avoids or minimises real and perceived danger as far as possible. It acknowledges and responds to the fact that different groups within the population use spaces, and perceive what is safe, differently (Policy A2). The policy also sets out a number of criteria to guide the design of developments to ensure they are safe and secure, for example by promoting overlooking of public spaces, providing effective lighting, and ensuring there are active spaces and frontages at the ground floor. This should benefit people who are pregnant or who have babies, who may feel more vulnerable using public spaces, particularly at certain times of the day.</p> <p>The Plan requires development to be designed to promote good health and well-being; provide a healthy living and working environment; support healthy and active lifestyles; be safe and accessible for all; promote social and economic inclusion; and support the provision of new and improved health facilities (Policy SC1). This could benefit people who are pregnant or who have babies, as the policy aims to improve health and ensure that healthcare facilities are provided to meet the needs of all.</p>
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Protected Characteristic	Is there potential positive impact? (Yes or No)	Explain the potential positive impact
Race	Yes	<p>The Plan seeks to maximise the supply of housing in the borough, including affordable housing, and allocates sites to deliver new homes (Policy H1 and Policy H4 and site allocation policies). This could benefit people from minority ethnic backgrounds who are more likely to live in housing that does not meet their needs.</p> <p>There are a number of Gypsy and Traveller households currently living in overcrowded conditions in the borough. The Plan allocates two sites to help meet the accommodation needs of Gypsies and Travellers and Policy H11 sets out the approach to meeting the specific accommodation needs of these groups.</p> <p>The Plan sets out the need to deliver new jobs over the Plan period to 2041 and allocates sites to help deliver this. Policy IE1 sets out the Council's strategy for supporting the delivery of a sustainable and inclusive economy. The policy approach taken supports local business start-ups, entrepreneurs and residents seeking work to access jobs, skills, education and training opportunities by maximising benefits during the planning, construction and end user phases, including the provision of affordable workspace and education and training contributions. The provision of more jobs and training could benefit people from all minority ethnic backgrounds, as it will enable them to access greater employment opportunities.</p> <p>The Plan seeks to protect and enhance the provision of both social and community infrastructure (Policy SC3) and cultural and arts facilities (Policy SC6), which are highly valued by the various groups and individuals they serve. The Plan's approach could therefore benefit people with this protected characteristic.</p> <p>The Plan provides guidance on the design of open space (Policy SC4) and public spaces (Policy D1) to ensure they are designed to be safe, welcoming, inclusive and accessible for all, which should benefit people from minority ethnic backgrounds who may feel more vulnerable or unsafe using certain spaces, particularly at certain times of the day.</p>

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		<p>To create a safer borough for all, the Plan also requires development to be designed, managed and maintained to create an inclusive environment that avoids or minimises real and perceived danger as far as possible, and acknowledges and responds to the fact that different groups within the population use spaces, and perceive what is safe, differently (Policy A2). The policy also sets out a number of criteria to guide the design of developments to ensure they are safe and secure for example by promoting overlooking of public spaces, providing effective lighting, and ensuring there are active spaces and frontages at the ground floor. This should benefit people from minority ethnic backgrounds who may feel more vulnerable using public spaces, particularly at certain times of the day.</p> <p>Furthermore, the approach to the design of public spaces (D1) also seeks to ensure they celebrate and reflect the diversity of the communities they are within, through high quality interpretation, events, public art and decorative features co-designed with local people, to ensure that new spaces are inclusive and meet the needs of the communities they serve. This should benefit people from minority ethnic backgrounds.</p>
Religion or belief	Yes	<p>Camden has many meeting places, churches, synagogues, temples, community facilities and prayer centres that cater for a range of faiths and beliefs. The Plan seeks to protect and enhance the provision of both social and community infrastructure (Policy SC3) and cultural and arts facilities (Policy SC6), which are highly valued by the various groups and individuals they serve. The Plan's approach could therefore benefit people with this protected characteristic.</p> <p>The Plan supports the provision of a range of shops and services in Camden's centres (Policy IE6). The Plan also seeks to support and protect Camden's Neighbourhood Centres, markets, areas of specialist shopping and local shops outside of centres that meet the day-to-day needs of residents (Policy IE6). This could benefit people of certain faiths who may use specialist shops, for example halal butchers.</p> <p>The Plan provides guidance on the design of open space (Policy SC4) and public spaces (Policy D1) to ensure they are designed to be safe, welcoming, inclusive and accessible for all, which should benefit people of certain faiths, who may feel more vulnerable or unsafe using certain spaces, particularly at certain</p>

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		<p>times of the day. The approach to the design of public spaces also seeks to ensure that they celebrate and reflect the diversity of the communities they are within, through high quality interpretation, events, public art and decorative features co-designed with local people, to ensure that new spaces are inclusive and meet the needs of the communities they serve, which could benefit people of certain faiths.</p> <p>The Plan sets out requirements for development to contribute to the delivery of 'Healthy Streets' that are designed to be safe, inclusive and accessible for all (Policy T1). The policy approach to prioritising walking, wheeling and cycling also requires development to be designed to be safe and easy to move through, adequately lit, inclusive and meet the needs of all pedestrians (Policy T2). These policies could benefit people of certain faiths, who may feel vulnerable walking around the borough, particularly at certain times of the day.</p> <p>To create a safer borough for all, the Plan requires development to be designed, managed and maintained to create an inclusive environment that avoids or minimises real and perceived danger as far as possible, and acknowledges and responds to the fact that different groups within the population use spaces, and perceive what is safe, differently (Policy A2). The policy also sets out a number of criteria to guide the design of developments to ensure they are safe and secure, for example by promoting overlooking of public spaces, providing effective lighting, and ensuring there are active spaces and frontages at the ground floor. This should benefit people of certain faiths, who may feel more vulnerable using public spaces, particularly at certain times of the day.</p>
Sex	Yes	<p>The Plan sets out the need to deliver new jobs over the Plan period to 2041 and allocates sites to help deliver this. Policy IE1 sets out the Council's strategy for supporting the delivery of a sustainable and inclusive economy. The policy approach taken supports local business start-ups, entrepreneurs and residents seeking work to access jobs, skills, education and training opportunities by maximising benefits during the planning, construction and end user phases, including the provision of affordable workspace and education and training contributions. The provision of more jobs and training could benefit people of all genders, especially women who can face disproportionate employment discrimination. Policy IE1 also recognizes</p>

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	<p>the need to address barriers to employment, for example childcare provision, which could benefit women, who are disproportionately affected.</p> <p>The Plan provides guidance on the design of open space (Policy SC4) and public spaces (Policy D1) to ensure they are designed to be safe, welcoming, inclusive and accessible for all, which should benefit all genders, especially women and girls, who may feel more vulnerable or unsafe using certain spaces, particularly at certain times of the day.</p> <p>The Plan seeks to protect and enhance the provision of both social and community infrastructure (Policy SC3) and cultural and arts facilities (Policy SC6), which are highly valued by the various groups and individuals they serve. The Plan's approach could therefore benefit people with this protected characteristic, especially women, who may access these spaces with their children, for example to attend baby groups etc.</p> <p>The Plan sets out requirements for development to contribute to the delivery of 'Healthy Streets' that are designed to be safe, inclusive and accessible for all (Policy T1). The policy approach to prioritising walking, wheeling and cycling also requires development to be designed to be safe and easy to move through, adequately lit, inclusive and meet the needs of all pedestrians (Policy T2). These policies could benefit all genders, especially women and girls, who may feel vulnerable walking around the borough, particularly at certain times of the day.</p> <p>To create a safer borough for all, the Plan requires development to be designed, managed and maintained to create an inclusive environment that avoids or minimises real and perceived danger as far as possible, and acknowledges and responds to the fact that different groups within the population use spaces, and perceive what is safe, differently (Policy A2). The policy also sets out a number of criteria to guide the design of developments to ensure they are safe and secure for example by promoting overlooking of public spaces, providing effective lighting, and ensuring there are active spaces and frontages at the ground floor. This should benefit all genders, especially women and girls, who may feel more vulnerable using public spaces, particularly at certain times of the day. The policy also requires developments to mitigate potential suicide risks associated with the built environment, which could benefit men who may be more likely to</p>
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		<p>experience poorer mental health and are at greater risk of suicide.</p>
<p>Sexual orientation</p>	<p>Yes</p>	<p>The Plan provides guidance on the design of open space (Policy SC4) and public spaces (Policy D1) to ensure they are designed to be safe, welcoming, inclusive and accessible for all, which should benefit Camden's LGBTQ+ community, who may feel more vulnerable or unsafe using certain spaces, particularly at certain times of the day. The approach to the design of public spaces also seeks to ensure that they celebrate and reflect the diversity of the communities they are within, through high quality interpretation, events, public art and decorative features co-designed with local people, to ensure that new spaces are inclusive and meet the needs of the communities they serve, which could benefit Camden's LGBTQ+ community.</p> <p>The Plan seeks to protect and enhance the provision of both social and community infrastructure (Policy SC3) and cultural and arts facilities (Policy SC6), which are highly valued by the various groups and individuals they serve. The Plan's approach could therefore benefit people with this protected characteristic.</p> <p>The Plan seeks to protect public houses, which are important for their social, economic, cultural and historic value (Policy SC7), which could benefit the LGBTQ+ community. Some pubs act as valued meeting spaces for different groups, including the LGBTQ+ community, as recognized in the Local Plan.</p> <p>The Plan sets out requirements for development to contribute to the delivery of 'Healthy Streets' that are designed to be safe, inclusive and accessible for all (Policy T1). The policy approach to prioritising walking, wheeling and cycling also requires development to be designed to be safe and easy to move through, adequately lit, inclusive and meet the needs of all pedestrians (Policy T2). These policies could benefit LGBTQ+ people, who may feel vulnerable walking around the borough, particularly at certain times of the day.</p> <p>To create a safer borough for all, the Plan requires development to be designed, managed and maintained to create an inclusive environment that avoids or minimises real and perceived danger as far as possible, and acknowledges and responds to the fact that different groups within the population use spaces, and perceive what is safe, differently (Policy A2). The</p>

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		<p>policy also sets out a number of criteria to guide the design of developments to ensure they are safe and secure for example by promoting overlooking of public spaces, providing effective lighting, and ensuring there are active spaces and frontages at the ground floor. This should benefit LGBTQ+ people who may feel more vulnerable using public spaces, particularly at certain times of the day.</p> <p>The Plan requires development to be designed to promote good health and well-being; provide a healthy living and working environment; support healthy and active lifestyles; be safe and accessible for all; promote social and economic inclusion; and support the provision of new and improved health facilities (Policy SC1). This could benefit LGBTQ+ people who may be more likely to experience health inequalities and come up against barriers when trying to access health care.</p>
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## 3.c Potential negative impact on other characteristics

Characteristic	Is there potential negative impact? (Yes or No)	Explain the potential negative impact
Foster carers	No	The Local Plan is not expected to have a negative impact in relation to this group.
Looked after children/care leavers	No	The Local Plan is not expected to have a negative impact in relation to this group.
Low-income households	No	The Local Plan is not expected to have a negative impact in relation to this group.
Refugees and asylum seekers	No	The Local Plan is not expected to have a negative impact in relation to this group.
Parents (of any gender, with children aged under 18)	No	The Local Plan is not expected to have a negative impact in relation to this group.

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Characteristic	Is there potential negative impact? (Yes or No)	Explain the potential negative impact
People who are homeless	No	The Local Plan is not expected to have a negative impact in relation to this group.
Private rental tenants in deprived areas	No	The Local Plan is not expected to have a negative impact in relation to this group.
Single parent households	No	The Local Plan is not expected to have a negative impact in relation to this group.
Social housing tenants	No	The Local Plan is not expected to have a negative impact in relation to this group.
Any other, please specify	N/A	N/A

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## 3.d Potential positive impact on other characteristics

Characteristic	Is there potential positive impact? (Yes or No)	Explain the potential positive impact
Foster carers	Yes	<p>Policy D4 (Extensions and Alterations) supports residents to extend and alter their homes, subject to a number of considerations, which could benefit foster carers as it will enable them to extend their homes to accommodate changes in family size and address issues of overcrowding.</p> <p>The Plan states that new and altered shopfronts should be designed to be fully accessible for all, which should benefit foster carers with prams and buggies etc. in accessing shops and facilities (see Policy D8).</p> <p>The Plan seeks to protect and enhance open space provision in Camden (Policy SC4). The impact of open space deficiencies are most greatly felt in higher density residential areas with higher numbers of children. The protection and addition of open space will increase opportunities for safe play.</p> <p>The Plan seeks to protect and enhance the provision of both social and community infrastructure (Policy SC3) and cultural and arts facilities (Policy SC6), which are highly valued by the various groups and individuals they serve. The Plan's approach could therefore benefit people with this protected characteristic.</p>
Looked after children/care leavers	Yes	<p>The Plan seeks to ensure there is a sufficient supply of housing for people with care or support requirements, including looked after children / young people leaving care (Policy H8). This should benefit looked after children / care leavers by helping to ensure that housing is provided to meet their needs.</p> <p>The Plan sets out the need to deliver new jobs over the Plan period to 2041 and allocates sites to help deliver this. Policy IE1 also sets out the Council's strategy for supporting the delivery of a sustainable and inclusive economy. The policy approach taken supports residents seeking work to access jobs, skills, education and training opportunities by maximising benefits during the planning, construction and end user phases, including the provision of affordable workspace and education and training contributions. The provision of more jobs and training could benefit care leavers</p>

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		<p>who are looking for work, in terms of helping them access greater employment opportunities.</p> <p>The Plan seeks to protect and enhance open space provision in Camden (Policy SC4). The impact of open space deficiencies are most greatly felt in higher density residential areas with higher numbers of children. The protection and addition of open space will increase opportunities for safe play. This could benefit looked after children.</p> <p>The Plan seeks to protect and enhance the provision of both social and community infrastructure (Policy SC3) and cultural and arts facilities (Policy SC6), which are highly valued by the various groups and individuals they serve. The Plan's approach could therefore benefit people with this protected characteristic.</p>
<p>Low-income households</p>	<p>Yes</p>	<p>The Plan seeks to maximise the supply of affordable housing and allocates sites to deliver new homes (Policy H4 and site allocation policies). The guideline mix in Policy H4 for affordable housing types is 60% social-affordable rented housing and 40% intermediate housing. Social rented housing is provided at rents guided by national targets and is mostly owned by the Council or Housing Associations. Affordable rented housing is also provided to households who are eligible for social rented housing, mostly by the Council or Housing Associations.</p> <p>This should help to address the shortage of affordable housing in Camden and provide a greater choice of housing to meet the needs of residents, which could benefit low-income households.</p> <p>Houses in Multiple Occupation (HMOs) are promoted and protected by policy H10 in the Plan. HMOs are residential units with some shared facilities (such as kitchens and bathrooms) and are shared by people who do not live as a family. They can generally be rented at a lower cost than self-contained dwellings, which could benefit low-income households.</p> <p>The Plan sets out the need to deliver new jobs over the Plan period to 2041 and allocates sites to help deliver this. Policy IE1 also sets out the Council's strategy for supporting the delivery of a sustainable and inclusive economy. The policy approach taken supports local business start-ups, entrepreneurs and residents seeking work to access jobs, skills, education and training opportunities by maximising benefits during the planning, construction and end user phases, including the provision of affordable workspace and education and training contributions. The provision of more jobs and training could especially benefit low-income</p>

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		households, in terms of helping them access greater employment opportunities.
Refugees and asylum seekers	Yes	<p>Policy H8 (Housing for older people, homeless people and other people with care or support requirements) sets out our approach to supporting the provision of housing to meet the needs of these particular groups. With regards to supporting the housing needs of children and young people, the supporting text of the policy recognises that one of the challenges the Council needs to respond to is the fact that a high proportion of local housing need is for unaccompanied children who are asylum seekers, often with complex emotional needs related to trauma and loss. The Plan's approach could therefore benefit people with this protected characteristic.</p> <p>The Plan sets out the need to deliver new jobs over the Plan period to 2041 and allocates sites to help deliver this. Policy IE1 also sets out the Council's strategy for supporting the delivery of a sustainable and inclusive economy. The policy approach taken supports local business start-ups, entrepreneurs and residents seeking work to access jobs, skills, education and training opportunities by maximising benefits during the planning, construction and end user phases, including the provision of affordable workspace and education and training contributions. The provision of more jobs and training could benefit refugees, in terms of helping them to access greater employment opportunities.</p> <p>The Plan seeks to protect and enhance the provision of both social and community infrastructure (Policy SC3) and cultural and arts facilities (Policy SC6), which are highly valued by the various groups and individuals they serve. The Plan's approach could therefore benefit people with this protected characteristic.</p>
Parents (of any gender, with children aged under 18)	Yes	<p>Policy D4 (Extensions and Alterations) supports residents to extend and alter their homes, subject to meeting a number of requirements, which should benefit parents as it will enable them to extend their homes to accommodate growing families and address issues of overcrowding.</p> <p>The Plan states that new and altered shopfronts should be designed to be fully accessible for all, which should benefit parents with prams, buggies etc. in accessing shops and facilities (see Policy D8).</p> <p>The Plan seeks to protect and enhance open space provision (Policy SC4). The impact of open space deficiencies are most greatly felt in higher density residential areas with higher numbers of children. The protection and addition of open</p>

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		<p>space will increase opportunities for safe play, which could benefit parents.</p> <p>The Plan seeks to protect and enhance the provision of both social and community infrastructure (Policy SC3) and cultural and arts facilities (Policy SC6), which are highly valued by the various groups and individuals they serve. The Plan's approach could therefore benefit people with this protected characteristic.</p>
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Characteristic	Is there potential positive impact? (Yes or No)	Explain the potential positive impact
People who are homeless	Yes	<p>Policy H8 (housing for older people, homeless people and other people with care or support requirements) relates to housing designated for occupation by homeless people and aims to ensure that there is a sufficient supply of appropriate housing to meet their needs, to enable them to live as independently as possible, which should benefit people who are homeless.</p> <p>The Plan also sets out the need to deliver new jobs over the Plan period to 2041 and allocates sites to help deliver this. Policy IE1 also sets out the Council's strategy for supporting the delivery of a sustainable and inclusive economy. The policy approach taken supports local business start-ups, entrepreneurs and residents seeking work to access jobs, skills, education and training opportunities by maximising benefits during the planning, construction and end user phases, including the provision of affordable workspace and education and training contributions. The provision of more jobs and training could benefit homeless people, in terms of helping them access greater employment opportunities.</p>
Private rental tenants in deprived areas	Yes	<p>The Plan seeks to maximise the supply of housing in the borough and allocates sites to deliver new homes (Policy H1, Policy H4 and site allocation policies), which could benefit private rental tenants in deprived areas, by providing a greater choice of housing to meet their needs.</p> <p>In addition to this, the Plan seeks to ensure that there is continued provision of housing with shared facilities to meet the needs of small households with limited incomes and modest space requirements (Policy H10), which could benefit private rental tenants in deprived areas, as Housing in Multiple Occupation (HMOs) can generally be rented at a lower cost than self-contained dwellings.</p>
Single parent households	Yes	<p>The Plan seeks to protect and enhance open space provision in Camden (Policy SC4). The impact of open space deficiencies are most greatly felt in higher density residential areas with higher numbers of children. The protection and addition of open space will increase opportunities for safe play, which could benefit single parent households.</p>

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		The Plan seeks to protect and enhance the provision of both social and community infrastructure (Policy SC3) and cultural and arts facilities (Policy SC6), which are highly valued by the various groups and individuals they serve. The Plan's approach could therefore benefit people with this protected characteristic.
Social housing tenants	Yes	The Plan seeks to maximise the supply of affordable housing and allocates sites to deliver new homes (Policy H4 and site allocation policies). The guideline mix in Policy H4 for affordable housing types is 60% social-affordable rented housing and 40% intermediate housing. Social rented housing is provided at rents guided by national targets and is mostly owned by the Council or Housing Associations. Affordable rented housing is also provided to households who are eligible for social rented housing, mostly by the Council or Housing Associations. This should help to address the shortage of affordable housing in Camden and provide a greater choice of housing to meet the needs of residents, which could benefit both existing and future social housing tenants.
Any other, please specify	N/A	N/A

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

No specific positive or negative impacts related to groups with a combination, or intersection of two or more characteristics are noted. However, the policies in the Proposed Submission Local Plan have the potential to benefit people of all backgrounds, intersections and at various stages of their lives.

<sup>4</sup> Intersectionality refers to the interconnected nature of social categorisations such as race, class, and gender as they apply to a given individual or group, regarded as creating overlapping and interdependent systems of discrimination or disadvantage.

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

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

Initial engagement took place in late 2022 / early 2023 to inform the development of the draft Local Plan. This included a 'call for views' to give residents, community groups, businesses and other interested parties the opportunity to share their views on the current Local Plan and priorities for the future. A summary of this engagement is set out in the EqIA of the draft Local Plan.

Following Cabinet approval in December 2023, the draft Local Plan was published for consultation and engagement for a period of 8 weeks from January to March 2024, to enable residents, businesses, community groups, landowners and other key stakeholders to share their views on the Plan's policies and approach.

The Plan was available to view online on the planning pages of the Council's website, and on 'we are Camden', the Council's consultation hub. An interactive version of the draft Local Plan was also available on commonplace to aid accessibility. Responses were invited via the commonplace site, by email and by letter.

A paper copy of the draft Local Plan was also available to view in all Camden's libraries. This was advertised on the Council's website and on promotional material.

The consultation on the draft new Local Plan was widely advertised through the following:

- An email sent to our consultation database (895 contacts), neighbourhood forums and Members. Other services were also asked to email their contacts;
- An email sent out by commonplace to everyone who has signed up to be notified about Camden consultations (4,000 people);
- We are Camden consultation page;
- The Council's social media platforms, including Facebook and Twitter;
- Planning policy webpages and a news article on the Council's website;
- Posters sent to libraries and community centres to display;
- A press release to local newspapers, which resulted in an article in the Ham and High;
- An advert in the Camden New Journal and the Ham and High;
- A short article about the engagement was included in the Council's business newsletter, Voluntary Action Camden newsletter, Camden libraries newsletter, the Friends of Camden's Parks newsletter; and the climate action newsletter;
- Development Management email alerts;
- Article in the Council's Planning Policy Newsletter.

As part of the engagement on the draft new Local Plan we also held a number of meetings, including:

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- Three online public engagement sessions in February 2024 to give residents the opportunity to find out more about the Plan and ask questions;
- A workshop with d/Deaf and disabled residents and representative groups held in March 2024 to discuss what more the Plan could do to better meet their needs; and
- A workshop with students from Regent's High School in January 2024 to get their perspective on the policy approach in the Plan and find out how they would like Camden to change in the future.

In total, the Council received over 2,350 comments from 245 respondents. 125 respondents commented through commonplace and 120 via email. Over the consultation period, there were also over 5,000 visits to the commonplace site.

A wide range of responses were received to the consultation, with the chapters that generated the most comments overall being the South Area and Central Area chapters, including site allocations; Climate Change; Design; and Housing.

Most responses requested that amendments be made to the wording of the Local Plan but did not generally raise fundamental issues about the Plan's approach or its ability to be found 'sound' at public examination. We have updated the Proposed Submission Local Plan to respond to the comments raised through the consultation and engagement, where relevant. A summary of the main changes we propose to make to the Plan, which are relevant to groups with protected characteristics, is set out below.

- The wording of the Plan has been reviewed and updated where considered necessary to respond to consultation comments and ensure it is as clear as possible.
- Two sites are proposed to help meet the need for Gypsy and Traveller Accommodation. The selection of sites has been informed by feedback from the Gypsy and Traveller community, wider feedback as part of the engagement on the Gypsy and Traveller Site Identification Study, and internal discussion with other services.
- Propose to add a new policy on the Euston Opportunity Area to set out the Plan's approach to the area.
- Four new site allocations are proposed to help deliver new homes and jobs.
- Permanent self-contained housing remains the priority land use in the Plan. We propose to make it clearer that the Plan also supports other forms of housing such as student housing and housing for people with care or support requirements (e.g. older people), subject to the specific policies for those types of housing, and the particular form(s) of housing specified in each site allocation.
- Updating the affordable housing policy to ensure it aligns with the approach set out in the London Plan, in response to comments from the GLA.
- Updating the large and small homes policy to give greater priority to one-bedroom homes and medium priority to two-bedroom homes (for market housing) in line with the findings in the Local Housing Needs Assessment.
- Updating Policy IE2 (offices) to state that housing (rather than just permanent self-contained housing) is the preferred use where it can be demonstrated an office use is no longer viable. This allows greater flexibility and would enable student housing to be

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delivered on these sites, where appropriate.

- Updating the affordable workspace policy to clarify that the targets relate to uplift / net additional floorspace and that affordable workspace targets are a working benchmark. We have also sought to provide greater detail on how the policy can be applied flexibly.
- Adding a dedicated 'access for all' policy to address comments made at the workshop with Camden's d/Deaf and disabled community.
- Strengthening the wording on the protection of cultural facilities.
- Adding a criteria into the design policy to ensure that developers use design teams that are as diverse as the communities they are building in

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

To inform the preparation of the Proposed Submission Local Plan focused meetings have been held with individual officers and teams from the following service areas: Adult Social Care, Housing, Corporate Strategy, Arts and Culture, Inclusive Economy, Transport, Sport and Physical Activity, Open Space, Sustainability, Development Management, Regeneration and Place, Urban Design, Property, Community Investment Programme.

Previously, as part of the preparation of the draft new Local Plan a series of workshops were held with key officers from Housing, Development Management, Community Investment Programme, Adult Social Care, Public Health, Corporate Strategy, Open Space, Sustainability, Inclusive Economy, Regeneration and Place, and Urban Design covering:

- Housing: meeting particular housing need and maximising housing supply;
- Local Economy: future employment strategy, the future of the office and the high street;
- Climate Change and the Natural Environment: energy efficiency, sustainability and the natural environment.
- Aligning the Plan with We Make Camden.

## Step 5: Informed decision-making

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

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

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<p><b>1. Change the activity to mitigate potential negative impacts identified and/or to include additional positive impacts that can address disproportionality or otherwise promote equality or good relations.</b></p>	<p>The EqlA of the Proposed Submission Local Plan has identified one potential negative impact on the age protected characteristic, resulting from the car-free policy (Policy T5), and many positive impacts resulting from other policies, particularly in relation to the provision of affordable housing; meeting housing needs for specific groups; jobs and training; the accessibility of buildings and space; provision of open space; design of public spaces; safety and security; health and well-being; and the provision and protection of community and cultural facilities.</p> <p>The car-free development policy is included in the current Local Plan, which was adopted by the Council in 2017, and was subject to EqlA. The policy approach proposed is also in line with the approach taken in the Council's Transport Strategy, which was also subject to an EqlA.</p> <p>Limiting the opportunities for parking within the borough and promoting car-free development can help reduce car ownership and use and therefore lead to reductions in air pollution, which could benefit older and younger people, as air pollution can have a particularly harmful impact on the health of these groups. It will also help reduce congestion, improve the attractiveness of an area, help tackle climate change, and promote health and well-being.</p> <p>Car-free development will also mean that the borough's limited land can be used more efficiently, which will help to free-up space to allow additional housing, employment uses, community facilities, play areas, amenity spaces and cycle parking, which could benefit all Camden's communities.</p> <p>The policy does, however, also recognise that some people, businesses, and organisations rely on private car use as their only transport option and considers parking provision for disabled people and essential uses where necessary.</p> <p>It is therefore considered that the wider benefits of the car-free policy, along with the many other positive impacts that the Plan will have on people with protected characteristics and other characteristics, outweigh the one potential negative impact identified for the Age characteristic in the EqlA.</p>
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<b>2. Continue the work as it is because no potential negative impacts have been found</b>	
<b>3. Justify and continue the work despite negative impacts (please provide justification – this must be a proportionate means of achieving a legitimate aim)</b>	
<b>4. Stop the work because discrimination is unjustifiable and there is no obvious way to mitigate the negative impact</b>	

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## Step 6: Action planning

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

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

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

Action	Due	Owner
<p>The Local Plan Proposed Submission Draft will be published for comment in April 2025. Following this, the Plan and supporting documents will be submitted to the government, in the Autumn, for public examination by a Planning Inspector.</p> <p>The examination will include public hearing sessions involving objectors and other participants invited by the Inspector. It is envisaged that these will commence at the start of 2026.</p> <p>Following receipt of the Inspector's report and consideration of any recommended amendments, the final version of the Local Plan will be taken to Cabinet and Full Council for adoption.</p>	April 2025 onwards	Planning Policy Team

## Step 7: EqIA Advisor

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

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

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

If you feel you could benefit from further advice, please contact the Equalities service at [equalities@camden.gov.uk](mailto:equalities@camden.gov.uk)



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## Step 8: Sign-off

<b>EqIA advisor / reviewer</b>	Brian O'Donnell Strategic Lead - Planning Policy and Implementation 5 February 2025
<b>Senior accountable officer</b>	Dan Pope Chief Planning Officer 12 February 2025