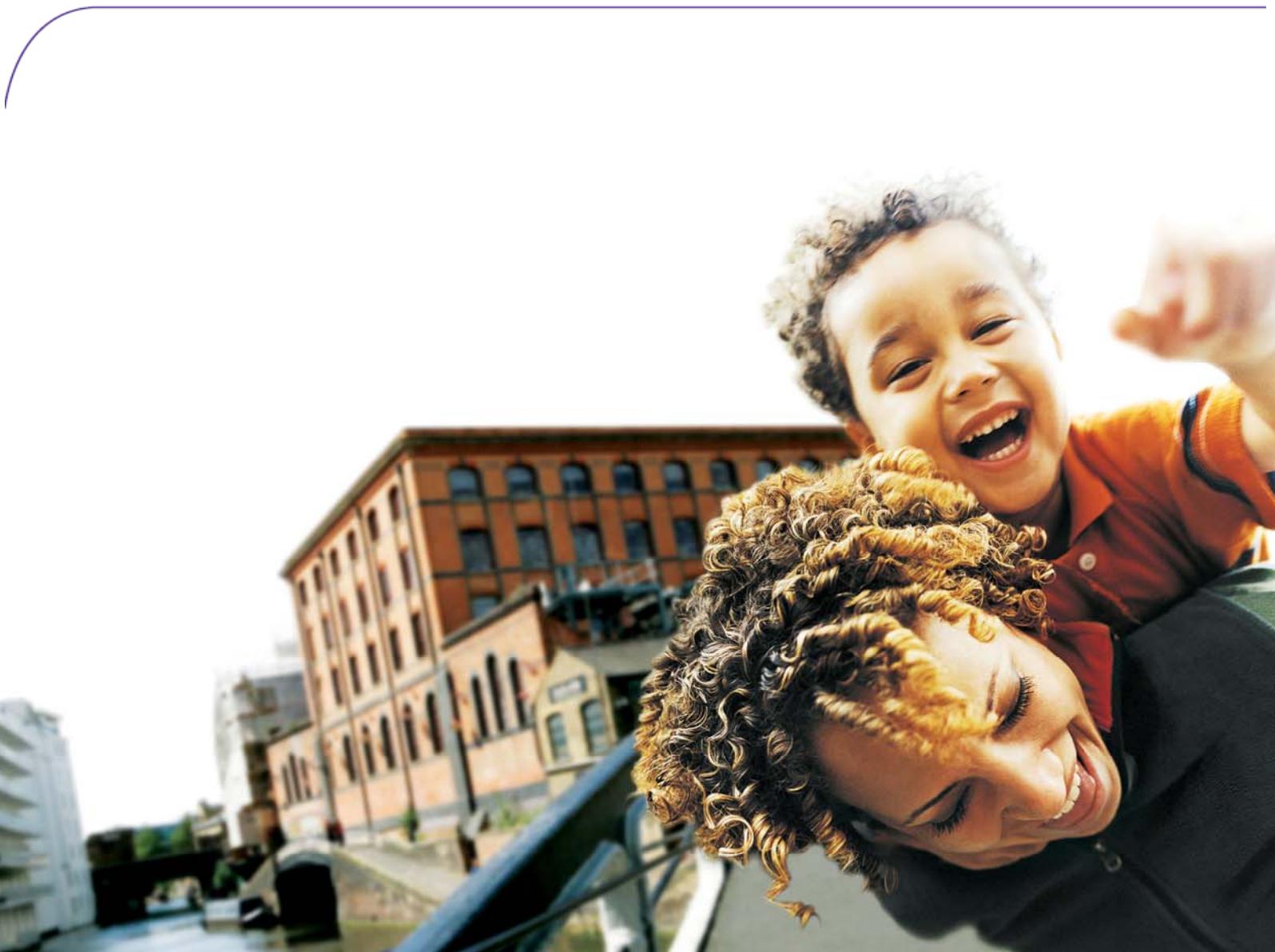


Camden Site Allocations

Local Development Framework

Equalities Impact Assessment

March 2012



Introduction

This document sets out the draft Equalities Impact Assessment (EqIA) of the London Borough of Camden Local Development Framework Site Allocations. The EqIA has been updated as the Site Allocations has progressed.

The purpose of the EqIA is to highlight the likely impact of the Site Allocations document on the target groups and to take action to improve the document where appropriate as a result.

Legislation

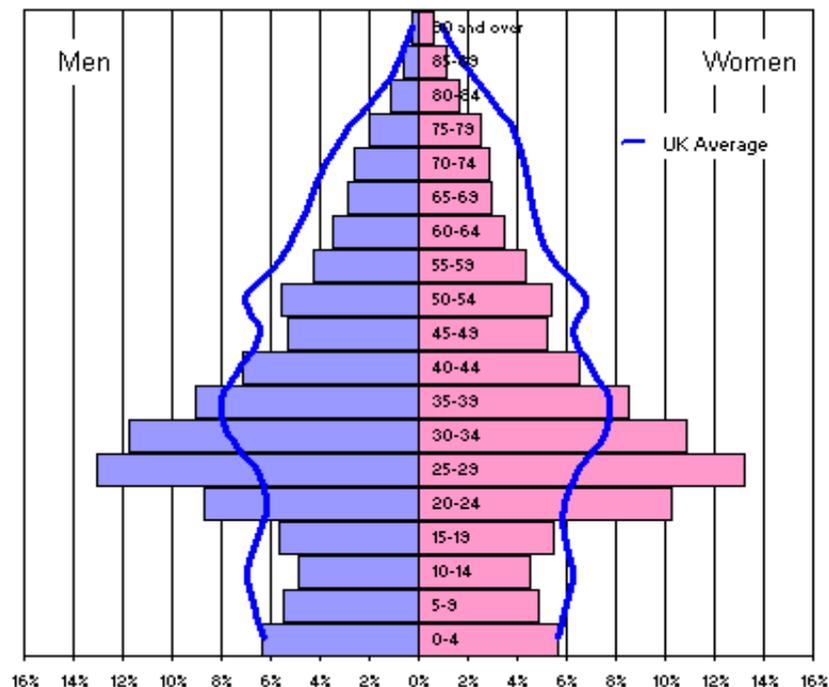
Under certain legislative requirements, it is necessary to consider the impacts of policies and strategies upon certain equality target groups. The requirements are as follows:

- **Race Relations (Amendment) Act 2000**
The amendment requires Local Authorities to be pro-active and positive in promoting racial equality. The authorities are required to undertake a Race Equality Impact Assessment of their strategies and plans. Failure to do so may lead to legal action being taken against them by the Commission for Racial Equality (CRE). The CRE is now part of the Equalities and Human Rights Commission (EHRC) as detailed on the next page.
- **Disability Discrimination (Amendment) Act 2005**
The Act requires Local Authorities to promote equality of opportunity for disabled people and avoid discrimination. The authorities must ensure that their policies, practices, procedures and services are not discriminatory against disabled people.
- **Equality Act 2006**
The Act establishes the Equality and Human Rights Commission (EHRC) which came into force in October 2007. It brought together as one organisation the CRE, Disability Rights Commission (DRC) and Equal Opportunities Commission (EOC). As well as gaining the powers of the three former commissions, it has additional powers to enforce equality legislation on age, disability, gender, race, religion and sexual orientation or transgender status more effectively.
- **Gender Equality Duty 2007 (as required by the Equality Act 2006)**
This came into effect in April 2007 and is aimed at public authorities (including Local Authorities) to eliminate unlawful discrimination and harassment and promote gender equality. There is a requirement to produce and publish a gender equality scheme. As part of this, the authorities must assess the impact of their existing and future policies and practices on gender equality as well as consult stakeholders with a scheme review every 3 years.

An EqIA takes into account all of the existing enforced legislation and also impending and probable future legal requirements therefore ensuring that it is line with diversity groups highlighted by the emerging EHRC. It should also meet the requirements of the Equality Standard for Local Government and a best value indicator.

Camden's people

The figure below illustrates the gender and age structure for Camden. There are slightly younger male children than girls but once over seventy five, there is a larger number of females. Generally, there is a significantly larger proportion of the population in their late twenties and early thirties. The older population is markedly smaller than the former categories.



Other characteristics of Camden's residents include:

- almost 210,000 people currently live in the borough and it is estimated that Camden's population will grow by 18% between 2006 and 2026;¹
- the increase in population will largely be due to more births and fewer deaths in future years, although migration will also play a part;²
- Camden has a relatively young population, with a concentration of people (over 70%) in the working ages (16- 59/64);³
- child numbers are growing but at a slower rate than the growth of the total population, although emerging evidence on fertility and births suggests the rate of growth may increase;⁴
- older people (60/65+) form a relatively small proportion (12%) of Camden's population. Younger pensionable ages (60/65-74) are forecast to grow by 40%, while the older pensionable ages (75+) are eventually forecast to grow by 19% after first seeing a decline to 2016;⁵
- Camden has the largest proportion of students in London;⁶
- Our population is ethnically diverse, with around 30% of residents from black or minority ethnic groups (compared to the England average of 9%);⁷
- almost half of Camden residents have qualifications of at least degree level while a quarter have few, if any, qualifications⁸ and many lack basic skills in literacy and numeracy;
- overall recorded crime levels have been falling in recent years but are still above the average for London;⁹
- Camden is a borough of diversity and contrasts. It contains wide inequalities in household income, health and other characteristics and every part of the borough has areas of relative affluence alongside areas of relative poverty.¹⁰ Camden is one of the most polarised boroughs in London with some of the wealthiest areas in England as well as some of the most deprived.

¹ GLA 2006 Round-based Population Projections - RLP High

² GLA 2006 Round-based Population Projections - RLP High

³ GLA 2006 Round-based Population Projections - RLP High

⁴ GLA 2006 Round-based Population Projections - RLP High

⁵ GLA 2006 Round-based Population Projections - RLP High

⁶ Census, 2001

⁷ GLA 2006 Round-based Ethnic Group Projections - RLP High

⁸ Census, 2001

⁹ Metropolitan Police Crime Statistics, 2006/7

¹⁰ Index of Multiple Deprivation 2007; CLG

The assessment form

The Equalities Impact Assessment form states the aims and objectives of the Local Development Framework Site Allocations. In addition to the aims and objectives the form covers:

- needs it is designed to meet
- current priorities
- procedures
- whether or not aims are in conflict with Council strategies
- whether or not any aspects could contribute to inequality
- main issues and meeting needs around particular groups
- data and consultation information
- whether any adverse impacts are justifiable or legitimate
- improvement plans.

Title of policy being assessed:	Local Development Framework – Site Allocations
Name of Department	Sites Team, Placeshaping Service
Name and role of the officer completing this assessment.	Neil Cleary
Contact Telephone Number:	020 7974 1341
Date assessment completed:	March 2012
Date of latest update:	March 2012
Defining the policy	
1. Why is the policy necessary? What are its aims and objectives? What outcomes is the policy designed to achieve and for whom?	
<p>Established as part of the Planning and Compulsory Purchase Act 2004, all local planning authorities must prepare a Local Development Framework (LDF). Our LDF contains a number of documents, including a Statement of Community Involvement, a Local Development Scheme, a Core Strategy, Development Policies, Site Allocations and a Joint Waste Plan.</p> <p>The Site Allocations Development Plan Document (DPD) will set out the Council's proposals for land and buildings on significant sites which are likely to be subject to development proposals during the lifetime of the LDF (2010-2025). These allocations are intended to assist in delivering the priorities and objectives of the Council's Core Strategy and the London Plan.</p> <p>Allocations will generally set out a preferred use or mix of uses for a specific site. They may also set out further detail of policy context and criteria and guidance for development of sites and set out other objectives to meet local needs and wider area requirements.</p> <p>These allocations will need to reflect the Council's Core Strategy and Development Policies and the sites and buildings included will need to demonstrate that they are available and deliverable.</p> <p>The Core Strategy sets out the Council's overall strategy in relation to growth, where it happens and how it is managed. The Site Allocations DPD translates this strategy to the site level. This will be done by:</p> <ul style="list-style-type: none"> • Promoting specific areas for development and growth • Making the best use of limited land • Supporting the role of the Central London area as part of a vibrant city • Making housing the priority land use of the LDF • Promoting mixed use development in achieving sustainable economic growth • Promoting higher development standards to tackle climate change • Promoting sustainable transport • Promoting our historic environment, high quality places and excellence in design • Protecting and improving parks and open spaces • Ensuring the provision of facilities and services to meet identified needs • Improve health and well-being • Making Camden a safer place 	

- Promoting access to facilities and opportunities
- Protecting the amenity of residents, workers and visitors
- Securing a strong economy including support for a diverse and beneficial range of economic uses
- Supporting town centres
- Identifying infrastructure needs and programmes

The Site Allocations and other LDF documents are intended to benefit all of Camden's communities and support the development of new housing of all types including affordable housing, supports economic growth and creation of jobs and supports the provision of community infrastructure.

2. How have these aims, objectives and outcomes been determined? What research has been undertaken/used to inform the design and delivery of the policy? How have needs based on race, gender, disability, age, religion/belief or sexual orientation (which Camden has defined as relating to lesbian, gay, bisexual and transgender people) been taken account of?

Consultation

Consultation has taken place in differing forms through the preparation of this DPD. The main elements have included:

- Awareness campaign (e.g. press releases, press notices, Camden website, Your Camden);
- Mail / Email distribution to relevant consultees in the LDF database; up to 800 contacts comprising statutory and public bodies; residents associations and other local groups; neighbouring authorities, developers and land owners and other interested parties;
- Mail out to properties within c.50 metres of each of the sites in the preferred options and additional sites consultation stages
- Attending meetings and making officers available to attend meetings with stakeholders, local organisations and groups.
- Meeting individuals with questions about the consultations
- Joined up approaches with other consultation events /methods on other LDF documents
- Making documents available on the website and in locations such as libraries
- Response forms on website
- Letter and extracts to ward members
- Development Control Committee
- Wherever possible documents made available in appropriate formats upon request (e.g. large print versions).

The main consultation stages and responses have been:

A. "Call for Sites"- An invitation for sites to be put forward: February/March 2008

- 16 organisation responses.
- 23 sites were suggested (with varying degrees of information; some sites exist within UDP).
- 16 new sites carried into an "Issues and Options" document

B. Issues and Options – Consultation October/December 2008

An Issues and Options consultation document was approved by the Executive on 10 September 2008 and public consultation on that stage lasted six weeks from October to December 2008. There were 56 written responses received on this initial consultation. A statement of these responses and proposed changes was produced for the next stage.

C. Preferred Approach – Consultation December/January 2010

The preferred approach document was approved for consultation by the Executive on 14 October 2009. Consultation on this document was carried out from the beginning of December 2009 to January 2010. Further responses were accepted into February. In total there were 110 responses.

D. Additional Sites Consultation - November-January 2011

Whilst it was originally envisaged to move to the next “submission” stage during 2010, during the preferred approach consultation we received further requests to include further sites. Following Cabinet approval on 20 October 2010 a further 10 additional sites were consulted on between November to January 2011. There were 31 responses received.

A full report containing all the comments and the Council’s responses is available, as well as a consultation statement which summarises all the main issues from the previous consultations and how these have been taken forward.

The final stage of consultation involves the Proposed Submission Site Allocations document which was published in March 2012. The purpose of this stage is to publish and make available the documents it proposes to submit to the Planning Inspector for examination and then adoption. This includes the Site Allocations document itself as well as any necessary supporting material (which includes the sustainability appraisal, a statement on the representations received during the Proposed Submission consultation and any other relevant supporting documents). It should be noted that the main purpose publication of the Proposed Submission documents is to gather representations on the soundness of the document so these can be considered by the Inspector during the examination.

Evidence and baseline data

The LDF documents have been informed by substantial social, environmental and economic baseline data which has been collected to assist in the assessment of the impact that the document will have on achieving those priorities identified in Camden’s Community Strategy, a document which itself has been informed by an extensive public consultation process. The following evidence base studies have also been undertaken:

- Housing Needs Study
- Employment Land Study Review
- Retail Study
- Open Spaces Study
- Camden Infrastructure Study
- Housing Land Availability Assessment

Sustainability

A Sustainability Appraisal (SA) has also been carried out as part of the LDF evidence base and research. The SA presents a Sustainability Framework that consists of objectives, indicators and targets to assist in monitoring and assessing the likely impact that the Site Allocations will have on Camden. The objectives have been selected to reflect the circumstances of the borough and the function of the planning system. There are a number of objectives that relate to equalities issues, such as tackling poverty, social exclusion and promoting equal opportunities.

3. Who is responsible for implementing the policy? What processes, procedures and/or criterion will be critical to deliver the policy? Review these against the access needs that various equality groups of people have. Do they result in barriers which prevent these groups of people from either finding out about the policy or benefiting from it?

Consider what barriers you can remove, whether reasonable adjustments may be necessary and how any unmet needs that you have identified can be addressed. For disabled people, as defined under the Disability Discrimination Act, this could mean treating them more favourably to ensure that there is equality of outcome.

The Site Allocations is developed and coordinated by officers in the Placeshaping Service within Culture and Environment. It will be implemented by officers within Placeshaping and Development Management. Other service areas and teams in the Council such as Housing and Adult Social Care, Parks and Open Spaces and Corporate Sustainability will have a role in implementing the Site Allocations and other LDF documents. Developers/landowners and other partner organisations will also be critical to delivering the aims and objectives of the Site Allocations DPD including Registered Social Landlords, the voluntary sector and the Local Strategic Partnership.

The following table identifies barriers to involving equalities groups and ways to overcome them. These include English not being someone's first language, problems accessing information, people not feeling safe attending evening meetings and the documents using too much jargon.

Group	Barriers / issues	Measures to overcome barriers
Amenity groups	<ul style="list-style-type: none"> • Other priorities than planning; • Attending community meetings that do not address their issues; • Jargon and legalistic terms; and • May not be aware of how other planning issues may affect their area of interest. 	<ul style="list-style-type: none"> • Provide information to ensure these groups are aware of how planning influences their area; • Use plain English; and • Translators and interpreters to be used where appropriate.
Black and minority ethnic groups	<ul style="list-style-type: none"> • Jargon and legal terms; • Need for prior knowledge; • English may not be the first language; • Other priorities than planning; • Discrimination; • Problems accessing information; • We may not be aware of their existence. 	<ul style="list-style-type: none"> • Avoid jargon; Use plain English; • Translators and interpreters to be used where appropriate. • Training groups in planning and council officers in understanding equality and diversity issues; • Coordinate council consultations; • Range of involvement methods; and • Gain local knowledge about how to engage groups; and • Add to mailing lists.
Business	<ul style="list-style-type: none"> • Accessing information outside of business hours (this is particularly a problem for small businesses); • Attending community meetings that do not address their needs; • Not understanding planning influences on their issues; • Other priorities than planning. 	<ul style="list-style-type: none"> • Ensuring that information is available at places which are open outside of normal office hours; • Hold/attend meetings at times that are accessible; and • Provide information and training focused at businesses. • Translators and interpreters to be used where appropriate.
Community groups and organisations	<ul style="list-style-type: none"> • Need for prior knowledge and experience; • Jargon and legal terms; • Lack of time; 	<ul style="list-style-type: none"> • Provision of information and training in planning focused on these groups; • Ensure that a range of

	<ul style="list-style-type: none"> • Other priorities than planning; • Accessing information barriers. 	<p>community involvement methods are used that are accessible to these groups;</p> <ul style="list-style-type: none"> • Make sure that groups are added on to relevant mailing lists; and • Hold/attend meetings at times that are accessible to these groups.
Disability	<ul style="list-style-type: none"> • Venues for meetings may not be accessible; and • Written or verbal material is not always appropriate. • Other priorities than planning. 	<ul style="list-style-type: none"> • Hold/attend meetings/events at accessible locations; and • Ensure that all written information is available in different formats such as Braille, large print and audio. • Translators and interpreters to be used where appropriate.
Lesbian, gay, bisexual and transgender	<ul style="list-style-type: none"> • Do not feel secure in raising LGBT issues at open events; • Other priorities than planning; 	<ul style="list-style-type: none"> • Hold specific LGBT consultation events; • Avoid jargon and use plain English; • Hold/attend meetings/events at convenient times and ensure that the venue is accessible and provides a safe environment.
Older people	<ul style="list-style-type: none"> • A lack of respect for their views; and • Older people may not feel safe attending meetings in the evenings; • Lack of knowledge of how and where to access information; • Other priorities than planning 	<ul style="list-style-type: none"> • Provision of information in appropriate locations; • Hold/attend meetings/events at accessible times; • listen to the views and feedback • Make information relevant. • Translators and interpreters to be used where appropriate.
Religious and faith groups	<ul style="list-style-type: none"> • Needs not being understood; • Need for prior knowledge and experience; • English may not be their first language; • Other priorities than planning; • Discrimination; • Accessing information; • May not understand how planning affects their group. 	<ul style="list-style-type: none"> • Avoid jargon; Use plain English; • Use translators and interpreters to where appropriate. • Train groups and individuals in planning • Train council officers to understand faith and belief issues; • Coordinate our consultations; • Use a range of involvement methods; and • Gain local knowledge about how to engage groups; and • Add to mailing lists.
Residents and individuals	<ul style="list-style-type: none"> • Need for prior knowledge and experience; • Jargon and legal terms; • English may not be their first 	<ul style="list-style-type: none"> • Provision of information and training in planning focused on these groups; • Ensure that a range of

	<p>language;</p> <ul style="list-style-type: none"> • Discrimination; • Problems accessing information; • Other priorities than planning; and • Lack of knowledge of how and where to access information. 	<p>community involvement methods are used that are accessible;</p> <ul style="list-style-type: none"> • Source local knowledge about how to engage individuals; and • Add onto our mailing lists. • Translators and interpreters to be used where appropriate.
Residents, neighbourhood and tenants groups/associations	<ul style="list-style-type: none"> • Other priorities than planning; • Suffer from 'consultation fatigue' as they get consulted on a number of our initiatives and programmes; • Need prior understanding and knowledge of planning issues; and • Finding the time to get involved in planning. 	<ul style="list-style-type: none"> • Coordinate consultation between different parts of the council to ensure that groups are not overwhelmed with consultations; • Make sure that groups are added on to relevant mailing lists; • Provide focused information; and • Hold/attend meetings at accessible times. • Translators and interpreters to be used where appropriate.
Young people	<ul style="list-style-type: none"> • May not be aware of the impact planning can have on them and/or how they can have an input; • English may not be a first language; and • May not be able to attend meetings in the evenings or during the day in term time. • Other priorities than planning. 	<ul style="list-style-type: none"> • Provide information that is focused at young people; • Attend schools and after-school centres and local youth forums to consult them on planning issues; • Translators and interpreters to be used where appropriate; and • Hold/attend meetings/events at accessible times.
Voluntary groups and organisations	<ul style="list-style-type: none"> • Need for prior knowledge and experience; • Jargon and legal terms; • Other funding commitments and priorities than planning; • Lack of time; and • Knowledge of how and where to access information. 	<ul style="list-style-type: none"> • Provision of information and training about planning focused on these groups; • Ensure that a range of community involvement methods are used that are accessible to these groups; • Make sure that groups are added on to relevant mailing lists; and • Hold/attend meetings at appropriate times that are accessible to these groups. • Translators and interpreters to be used where appropriate.

4. What measures and methods have been designed to monitor the application of the policy, achievement of intended outcomes and identification of any unintended or adverse impact? How frequently will the monitoring be conducted and who will be made aware of the analysis and outcomes?

The Council will monitor the effectiveness of the Site Allocations in delivering its objectives by assessing its performance against a series of indicators. These are set out in the Local Development Framework Monitoring Indicators document. A number of indicators will be included within this document. These will include core indicators, set by the government, and local Camden-specific indicators. Each year we will publish an Annual Monitoring Report. This will:

- assess the performance of the LDF documents;
- identify the need to reassess or review any policies or approaches;
- make sure the context and assumptions behind our approach are still relevant; and
- identify trends in the wider social, economic and environmental issues facing Camden.

5. Assess whether the policy could result in adverse impact on or discrimination against different groups of people. If you consider that there is adverse impact or discrimination, or the potential for either, please outline below and state whether it is justifiable or legitimate and give your reasons for this.

Assessment has been carried out to assess if the Site Allocations will have any adverse impacts on people due to their age, disability, ethnicity, sexuality, faith or gender. The assessment found the Site Allocations will not have any adverse impacts or discriminate negatively against any groups of people.

The following table shows the results of that assessment. Impacts could be adverse, neutral or positive.

Key

A – adverse impact, N – neutral impact, P – positive impact

Preferred Approach	Race	Gender	Disability	Age	Religion/ faith	Sexual orientation	Commentary
Individual Site Allocations	N	N	P	N	N	N	<p>Individual site allocations will set out the Council's proposals for land and buildings on significant sites which are likely to be subject to development proposals during the lifetime of the LDF (2010-2025). These allocations are intended to assist in delivering the priorities and objectives of the Council's Core Strategy and the London Plan.</p> <p>The Site Allocations document will not have a negative impact on different groups of people and can be seen to have positive impacts by promoting specific types of development to meet a range of needs and making accessibility and safety a recurring theme in how new development should be designed .</p>

										Specifically it highlights Gypsy and Traveller site provision and the need to meet provision in the future
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5 (a) If you have identified adverse impact or discrimination that is illegal; you are required to take action to remedy this immediately.

5(b) If you have identified adverse impact or discrimination that is justifiable or legitimate, you will need to consider what actions can be taken to mitigate its effect on those groups of people. This arises out of the duty to promote good relations between people of different groups and is in keeping with the Council’s approach to social cohesion.

Ensure that these actions are listed in the attached equality improvement plan.

No adverse impact or illegal discrimination has been identified through this assessment. Actions to progress identified barriers to inclusion, social cohesion and to tackle inequality are contained in section 6.

OPPORTUNITIES FOR SOCIAL COHESION OR PROMOTING GOOD RELATIONS BETWEEN DIFFERENT GROUPS OF PEOPLE

6. Social cohesion is a priority for Camden. Essentially social cohesion is about promoting a sense of connection, trust and belonging both within and across communities and groups. Review the policy that is being assessed and identify what social cohesion issues could arise.

There are a number of issues associated with our planning policy documents, which indirectly promote and affect social cohesion. These planning documents are important in setting out our objectives for future development in the Borough including new housing of different types, supporting economic growth and job creation and identifying needs for community and social infrastructure. Therefore it has been important for our diverse population to be offered the opportunity to be involved in the preparation of these documents and that the final document reflects the views obtained through consultation. Our Consultation Statement sets out the stages of consultation and how we consulted the local community, developers and other stakeholders. All the LDF documents, including the Site Allocations DPD, are in accordance with our adopted Statement of Community Involvement (SCI), which sets out how and when we will involve the community in the development of planning documents and applications for planning permission.

The LDF Documents, particularly the Core Strategy explicitly demonstrates a strong commitment to promote equality across race, gender, disability, age, religion/belief, the LGBT communities and gypsy and traveller communities. This is demonstrated through the inclusion of cross-cutting Strategic Objectives e.g. *to secure mixed and balanced areas with a sense of community, avoid polarisation in the borough and promote equality of opportunity.*

EQUALITY IMPROVEMENT PLAN

Please list all the equality targets that result from the Equality Impact Assessment (continue on separate sheets as necessary). These now needed to be included in the relevant service plan for mainstreaming and performance management purposes.

Equality Target	Officer responsible	By when
New staff to attend equality and diversity training	Sites Team	ongoing
Ensure relevant equality and diversity indicators included in the Annual Monitoring Report	Sites Team	ongoing
Review evidence base regularly	Sites Team	ongoing
Review methods of consultation that promote the involvement and participation of hard to reach groups and implement actions identified in this EqIA	Sites Team	ongoing
Review progress against equalities actions	Sites Team	ongoing