

CAMDEN COUNCIL
EQUALITY IMPACT
ASSESSMENT
CAMDEN ROAD HOSTEL
DEVELOPMENT

June 2020



**LB Camden
Equality Impact Assessment**

Camden Road Hostel Development

Independently Reported by Ottaway Strategic Management Ltd

June 2020

Contents

1	Executive Summary	4
	Introduction	4
	Approach and methods	4
	Camden's Approach to Homelessness	4
	Equality monitoring	4
	Summary of EqIA findings	5
	Positive impacts.....	9
	Recommended Mitigations	9
	Generic mitigation activity	9
	Equalities targeted mitigation activity	9
2	The regeneration proposals for the Camden Road	11
3	Summary of equalities evidence held by LB Camden	13
	Equalities Profile of LB Camden	13
	Cantelowes Ward Population Profile.....	14
	Profile of the Current Residents at Camden Road Hostel.....	16
	Establishing the future protected characteristic profile of Camden Road.....	17
	England's Lane Residence (ELR).....	17
	Family Residents in Camden's Temporary Accommodation	17
	Camden's Adult Homelessness and Rough Sleeping pathway	18
4	Equality Impact Assessment	20
	Aims of the proposal (What is changing and why?)	20

	Objective Justification for the Scheme	20
	Relevance to the General Duty	21
	Regeneration activity, programme rationale, regeneration consequences and likely equality impacts.	21
	Camden Road Hostel Equality Impact analysis in summary	24
5	Summary of Key Findings	33
	Relevance of the Hostel to specific client needs	33
	Generic Regeneration consequences.....	34
	Positive impacts.....	34
	Support for families.....	35
	Value of the regeneration proposals	35
	Recommended Mitigations	35
	Generic mitigation activity	35
	Equalities targeted mitigation activity	36
6	Appendix 1: Key Definitions	37
7	Appendix 2: Equality Impact Assessments, introduction and context	38
	What is an Equality Impact Assessment for?	38
	Equality Act 2010.....	38
	Equality Impact Assessments	39
8	Appendix 3: Equalities and regeneration policy consideration local, regional and national	42
	Camden's equality objectives:	42
	Homelessness and Rough Sleeping Strategy 2019-2024	44
	Camden Homeless Young Peoples Protocol	45
	Camden Homelessness Accommodation Policy and Placement Policy	45
	Camden's Housing Allocation Scheme 2018.....	46
	National Policy	46
	National Planning Policy Framework	46
	London-wide policy: London Plan	47
	Equal Life Chances for All, the Mayor's equality strategy revised in June 2014.....	48
9	Appendix 4: Acknowledgements and thanks.....	49

1 Executive Summary

Introduction

- 1.1 Camden Road Hostel is a redevelopment proposal that is being funded through the borough's Community Investment Programme (CIP).
- 1.2 The Camden Road Hostel redevelopment involves demolition of the existing building, which provides a 25 bed single female hostel and has become tired and is in need of structural repair. It is proposed that this be replaced with a six storey building that will provide 39 high quality homes for much needed family accommodation. This will include 36 studios units, 2 x 1-bedroom units and 1 wheelchair accessible home with windows facing both the main road and the rear garden.
- 1.3 The existing occupants of the single female person hostel will be decanted to other recently developed single person units around the borough or supported on their pathway to other housing options.

Approach and methods

- 1.4 This Equality Impact Assessment (EqIA) has included a desktop review of core legislation, policy and council papers (See appendix 3). It also includes a review of data held on the equality characteristics of the borough and the local ward, Cantelowes, the profile of the existing residents on site and the profile of the estimated population of the new units (see section 3).
- 1.5 There is no concrete information available about those who will be likely beneficiaries of the scheme once fully developed. However, it is clear that these potential beneficiaries will broadly reflect the profile of those families that have been provided with temporary accommodation and that they are representative of all protected characteristics.

Camden's Approach to Homelessness

- 1.6 The Camden 2025 Plan sets out a call to action that by 2025 'everyone should have a place they call home, and nobody should be sleeping on the streets'. The Camden Plan also sets out a commitment to "...make sure that everyone has a sustainable roof over their head or is on a pathway to achieving this, minimising homelessness and rough sleeping." By focusing on prevention, it will help reduce the factors that contribute to homelessness "We will focus on intervening early and doing what we can to prevent long-term conditions which impact on people's quality of life later on."

Equality monitoring

- 1.7 Camden has a relatively young population. In 2019, the median age of the population is 38 – two and a half years younger than the England average. The gender split in the Camden population is 50.6% male and 49.4% female. Around one in seven (14%) of Camden residents had a long-term health problem or

disability. More than a third (34%) of Camden's population are from Black, Asian and minority ethnic groups. Camden's largest ethnic group is the *Bangladeshi* population – who comprise 4.5% of residents, though the borough is also home to a large *non-British White* population (27%), including Irish and others originating from English-speaking countries in the new world; as well as from the EU, Eastern Europe and beyond. Camden's three largest religious groups are Christian (38%), Muslim (14%) and Jewish (5%). Around 30% of Camden residents were married and 0.9% were in a civil partnership. 9.3% of Camden residents surveyed identified as Lesbian, Gay, Bisexual or 'Other'¹. The lone parent population of the borough is 6.4%.

- 1.8 Cantelowes Ward's gender profile is similar to that of the borough with 49.3% male and 50.7% female residents. The ethnic minority profile shows a population of 51.5% below that of Camden and the BAME population is 31.5% also below that of the borough. The age profile shows a larger working age population and a lower child population and the disability/limiting Long-term illness profile is slightly larger at 15.1%. The profile of faith/religion and marriage and civil partnership are similar to the borough, although the lone parent profile is higher at 7.6%.
- 1.9 The current residents of Camden Road Hostel are all female. The Ethnic Minority profile is 63% higher than the borough and ward profiles and the BAME profile is 37%, again higher than the borough and ward profiles. Being a single person hostel the age profile is predominantly working age (90% of residents) although there are 10% of residents above working age i.e. over 65 years old. The temporary accommodation team have stated that 36.3% of current residents have a disability related to physical, learning or mental health.
- 1.10 Likely profile of future residents is based on a proxy measurement of the profile of the families housed in temporary accommodation by the borough. This shows.
- 70% of households are likely to be occupied by female tenants
 - 87.6% are likely to be providing for ethnic minority families and 74.3% BAME
 - 63% with dependent children under 5 including maternity and 29% with dependent children over 5
 - 10% LGBTQ
 - 67% of household led by lone parents

Summary of EqIA findings

Protected Characteristic	Context	Assessment of Impact	Mitigation
Ethnicity	The ethnic population of the new units should be reflective of the homeless families currently being provided with temporary	<ul style="list-style-type: none"> • The allocation of the units should be on the basis of housing need as per the allocations policy 	<ul style="list-style-type: none"> • To ensure that the Council's Homelessness Accommodation Policy

¹ Source: Public Health England modelled estimates of the size of the lesbian, gay and bisexual (LGB) population, © PHE

Protected Characteristic	Context	Assessment of Impact	Mitigation
	accommodation in Camden 87.6% Ethnic Minority and 74.3% BAME The design of the units are generic and not diversity specific Allocation is to be applied through the Council Policy and thus should not have negative impacts on the grounds of ethnicity	<ul style="list-style-type: none"> There are no identified negative impacts on the grounds of race. 	and Placement Policy are applied consistently in the allocation of these units
Gender	The site is currently a female only single person's Hostel. This cohort will be relocated to other units and supported through the adult homelessness pathway. The new units are likely to be housing a high proportion of family units led by lone female parents. (currently 67% of the families in temporary accommodation)	<ul style="list-style-type: none"> The allocation of the units should be on the grounds of need as per the allocations policy There are no identified negative impacts on the grounds of gender. There is a potential negative impact on the needs of women who require female only units as part of their adult homelessness pathway. 	<ul style="list-style-type: none"> To ensure that the council' Homelessness Accommodation Policy and Placement Policy are applied consistently in the allocation of these units. The homelessness team to develop alternative women specific solutions in the mixed units remaining.
Age	Families in the borough's temporary accommodation show high proportions of children of working age parents. The designs of the units clearly take this into account. Physical access also addresses the needs of buggies and there is some recreational space to the rear of the building. The layout and fit of the units have amenities/equipment needed for family living	<ul style="list-style-type: none"> The units are developed for families of 3 or 4 persons. The design of the studios and one bedroom units are provided predominantly for families with young children. Given the design of the units there are no negative equality impact on the grounds of age. 	<ul style="list-style-type: none"> The presence of children may place a need to address the outdoor / play space for young family members.
Disability/ Limiting Long-term Illness	The proportions of people in Temporary Accommodation that have a disability, or a limiting long-term illness is unknown. It is 14% in the borough. There is one unit at Camden Road that is proposed for Wheelchair access and it is set in the grounds of the Hostel with direct street	<ul style="list-style-type: none"> The Scheme's proposals do not manifest in a way that impacts on disability. There are no direct negative impacts identified from a disability perspective. 	<ul style="list-style-type: none"> To secure the needs of disabled people the units within the hostel should meet Part M of the Building Regulations.

Protected Characteristic	Context	Assessment of Impact	Mitigation
	access to the rear of the main building.		
Sexual Orientation	<p>The level of information about the sexual orientation of those in temporary accommodation is limited, as many have refused this voluntary question.</p> <p>90% of those that did not refuse state they are Heterosexual thus leaving 10% who are LGBTQ which is higher than the ward and the borough.</p>	<ul style="list-style-type: none"> • The regeneration proposals do not manifest in a way to impact on a person's sexual orientation. • From the evidence gathered there are no direct negative impacts from a sexual orientation perspective 	None required
Faith/Religion	<p>There is no data on the faith of those in temporary accommodation. Faith or religion is not a consideration in the design or development of the building. Nor is it a consideration in the allocation of accommodation. The scheme should be neutral from a faith and or religion basis.</p>	<ul style="list-style-type: none"> • The decanting of the existing residents and the allocation of the new units is universal irrespective of their faith. On this basis there are no discernible negative impacts which are seen to be a result of religion and beliefs. 	None required
Gender Reassignment	<p>Gender Reassignment is recorded on the Housing Management System. As in the case of Gender the units have been designed for homeless families. Where someone in that family to have undergone a transition this would not inhibit their ability to access these units.</p>	<ul style="list-style-type: none"> • The allocation of the units should be on the grounds of need as per the allocations policy • There are no identified negative impacts on the grounds of trans gender. 	None required
Marriage/Civil Partnership	<p>The council recognises gay relationships and civil partnerships with respect to household composition.</p> <p>There was no data collected on the marriage/civil partnership status of the residents currently on site although as such they were all perceived to be single female residents.</p> <p>The marital status of families seeking temporary accommodation is not a limiting factor. Unmarried partners with children are still</p>	<ul style="list-style-type: none"> • The regeneration proposals do not manifest in a way so as to impact on the grounds of marriage or civil partnership. • From the evidence gathered there are no direct negative impacts from a marriage/civil partnership perspective. However, by providing for family units in the new scheme it is likely that there will be a positive 	None required

Protected Characteristic	Context	Assessment of Impact	Mitigation
	provided with temporary accommodation if they state they are a family.	equality impact for this group.	
Pregnancy Maternity	Details about pregnancy are taken as part of the allocation process. However, this data was not available to this EqIA. Nonetheless it is clear that there are high levels of lone parents, 67% of families in temporary accommodation. Many families also have children u5 and are also undergoing pregnancy or the first 6 months of maternity	<ul style="list-style-type: none"> • High potential impact of temporary accommodation supporting parents of young families and or some who are undergoing pregnancy and in the first six months of pregnancy. • This provision has a strong positive impact on homeless women undergoing pregnancy and maternity 	None required
Lone Parent Households	Two in three families in temporary accommodation are led by a lone parent (67%).	<ul style="list-style-type: none"> • Disproportionate levels of lone parents provided for by temporary accommodation. • This provision has a strong positive impact on these people 	None required
Language	The level to which English is not a family's first language is critical to the consultation of this scheme and the ongoing management of tenancies for residents of the new units. For 14.4% of residents in Camden English is not their first language	<ul style="list-style-type: none"> • Potential negative impact if people do not understand or are unable to access information about this scheme • Potential negative impact on tenancy sustainability if residents do not understand the terms of their tenancy 	<ul style="list-style-type: none"> • Ensure the provision of translation of consultation materials • Ensure residents have access to translation/ interpretation to discuss their tenancy should they require this

1.11 Overall, from the assessment above there are no direct negative equality impacts identified against any of the protected characteristics. There are some mitigating issues that require inclusion to ensure the safeguarding of the borough's equality

interests and to support their compliance with the General Duty under the Equality Act 2010.

Positive impacts

- 1.12 It is difficult to substantiate all the positive impacts to accrue from the redevelopment of Camden Road Hostel. However, some of the relevant elements are:
- 39 new homes build to high quality hostel specifications providing accommodation for families providing up to 120 bed spaces
 - Each unit will be to a high specification including a fully fitted out kitchen and bathroom facilities together with essential amenities/equipment
 - Amenity space to the front and rear of the building
 - Provision of a new building designed to blend into its local environment
 - Targeting needs of families with children many of whom represent all protected characteristics.
- 1.13 From an equalities perspective it is most likely that these regeneration benefits will be shared across all protected characteristics.

Recommended Mitigations

- 1.14 There are however some mitigating actions that can be considered as options to apply some level of relief to these regeneration impacts and to safeguard the equality and diversity benefits of the scheme. Indeed, some of these mitigations can be more impactful for some protected characteristics than others.

Generic mitigation activity

- Consultation phase: ensure a wide cross section of the community representing all protected characteristics have access to the consultation process and are encouraged to engage, particularly to ensure the availability of translated consultation materials
- Manufacturing phase: monitor the workforce equality profile of the providers manufacturing the building pre site assembly.
- Construction phase: to seek to work with local labour and or a workforce that reflects the Camden community
- Housing families in temporary accommodation: to ensure that the homelessness allocation policy is used to allocate accommodation in the new units thereby mitigating any forms of subjectivity and decisions made outside the agreed allocation policy

Equalities targeted mitigation activity

- To establish the needs of each family that takes account of their relevant protected characteristics
- To ensure that the construction workforce is reflective of local people
- To seek a profile of new residents of Camden Road to broadly reflect the equality and diversity profile of those families in temporary accommodation

- To establish equality and diversity monitoring systems for those in temporary accommodation that meets the 9 protected characteristics from the Equality Act 2010 with the addition of health, social and economic characteristics, lone parents and those where English is not the first language of anyone in the household.
- To ensure that all designs and access throughout the final designs meet nationally recognised inclusive design standards

2 The regeneration proposals for the Camden Road

- 2.1 Camden Road Hostel (248-250 Camden Road) is part of an ambitious plan whereby Camden Council is seeking to ensure that everyone has a place to live or is on a pathway to achieving this, minimising homelessness and rough sleeping. Camden Council are developing a portfolio of temporary hostel accommodation that better meets the needs of homeless households and supports the longer-term objectives of finding them settled, sustainable housing. Camden's goal for this project is to provide high quality council-owned family accommodation that is welcoming and secure while also improving the quality of this site on Camden Road.
- 2.2 The existing building currently provides short term housing for single women. Camden Council recently re-developed two new hostels elsewhere in the Borough where single women in temporary housing will be relocated, freeing up 248-250 Camden Road to provide improved hostel services. The council have carried out a study of the potential redevelopment options for the site and have identified it as a suitable location for family hostel accommodation. Thus, the building will house homeless families for a temporary period of time, helping them to get back on their feet and providing the stability in order to do so.
- 2.3 The proposal is for a six storey building that will provide 39 new homes for much needed family accommodation. The new building steps down on each side to match the height of neighbouring buildings. The Council are proposing to use brick for the ground floor, and glazed terracotta tiles for the upper floors, which are both attractive and robust. It is important that the building looks as attractive in 25 years' time as it will do when the first new residents move in. The glazed tiles provide a soft backdrop to the prominent trees as viewed from Camden Road, whilst brick provides a solid base for the building, which is in-keeping with the local context.
- 2.4 The council have carried out a comprehensive study of the existing building to explore whether it can be refurbished rather than replaced. This study identified several problems which would have prevented the re-provision of high-quality homes within the existing building. The new building will be built to high quality standards and will use innovative forms of energy generation, including air-source heat pumps and PVs on the roofs.

The Homes

- 2.5 39 high-quality homes will be provided in the new hostel (including 36 studios, 2 x 1-beds and 1 wheelchair accessible home) with windows facing both the main road and the rear garden. This will improve the daylight and ventilation for everyone. The proposed layout has been designed with two distinct living areas. The front door opens into an equipped kitchen and dining area, with storage for a buggy. The centre of the home is occupied by a bathroom and general storage. Beyond that is a sleeping area that can be separated from the rest of the living area, allowing adults to enter the home while children sleep in the bedroom.

The Lobby

- 2.6 The lobby has been designed to be a welcoming place where staff can interact with residents, whilst also monitoring who enters the building to ensure the safety of residents. The staff area opens into the lobby creating a generous space, where post boxes and a seating area will be provided to build a sense of community.

The Access Gallery

- 2.7 An external stair lift and gallery along the south eastern elevation provide direct access to all homes. Fixed sitting areas have been integrated into the gallery to encourage residents to sit, socialise and watch over their kids playing in the rear garden. By providing fixed furniture the deck will be kept uncluttered and easily managed by staff.

The Rear Garden

- 2.8 The rear garden is currently underused. It is a huge opportunity to improve the daily lives of residents. There will be a mixture of soft and hard landscaping with a variety of spaces at different levels. This will include a small single storey community room and a wheelchair accessible home, which will be sunken into the ground to ensure level access and minimise any impact on adjacent gardens.

The Construction Process

- 2.9 Camden Road Hostel is one of a number of projects that the council is currently undertaking to bring forward a new approach to construction. They are proposing to use precision design and offsite manufacturing to construct the majority of the hostel in a factory. The key benefits of offsite construction include:
- Significantly reduced site works minimizing adverse noise, air and quality of life impacts to local residents.
 - High environmental / sustainability benefits: low construction and material waste in comparison to traditional development; significantly reduced vehicle trips/deliveries to site; high thermal performance requiring minimal energy inputs for heating and reduced annual running costs.
 - Efficiency of production and quality control within a factory environment which reduces works on site.

3 Summary of equalities evidence held by LB Camden

- 3.1 This EqIA seeks to review the proposals set for the redevelopment of the Camden Road Hostel. In any EqIA there is a need for equalities monitoring and set out below are some of the currently held data sets both for the borough and the Cantelowes ward and the research findings from the Borough's Homelessness team.

Equalities Profile of LB Camden

- 3.2 In summary Camden has a relatively young population. In 2019, the median age of the population is 38 – two and a half years younger than the England average. The population is expected to have a higher proportion of older people in the future: the number of residents aged 65+ is expected to increase by more than three quarters (+72%) between 2019 and 2039 – an increase of 22,800 older residents².
- 3.3 The gender split in the Camden population is 49.4% male and 50.6% female. The proportion of men is highest in the 25-44 age group where they comprise 53% of the population. In contrast, women make up a higher proportion of Camden's older population: 58% of those aged 75+ are female³.
- 3.4 Around one in seven (14%) of Camden residents has a long-term health problem or disability that limits their day-to-day-activities in some way. The prevalence of disability rises sharply with age: almost half of all residents aged 65+ had a long-term health problem or disability, rising to more than three quarters (77%) of people aged 85+⁴.
- 3.5 More than a third (34%) of Camden's population are from Black, Asian and minority ethnic groups. Camden's largest single ethnic group is the *Bangladeshi* population – who comprise 4.5% of residents, though the borough is also home to a large *non-British White* population (27%), including Irish and others originating from English-speaking countries in the new world; as well as from the EU, Eastern Europe and beyond. The age structure of the population varies by ethnic group⁵.
- 3.6 Camden's three largest religious groups are Christian (38%), Muslim (14%) and Jewish (5%). Other religions include Hindu (2%) and Buddhist (1%). Overall, 61% of residents stated they had a religion, while 29% stated they had had no religion. Note - the religion question was a voluntary question in the census and 10% of people in Camden did not make a response⁶.
- 3.7 Fertility in Camden is low. In 2017, there were 2,607 live births in Camden, giving a total fertility rate (TFR) of 1.17⁷ - the lowest fertility rate in England, but likely associated with the high numbers of female university students who live in the

² Source: GLA 2017-based Projections 'Camden Development, Capped AHS', © GLA, 2019.

³ Source: GLA 2017-based Projections 'Camden Development, Capped AHS', © GLA, 2019 at mid-2019.

⁴ Source: 2011 Census table DC3302EW, © ONS Crown Copyright.

⁵ Source: GLA 2016-based Projections 'Camden Development, Capped AHS', © GLA, 2018 (projected population at mid-2019).

⁶ Source: 2011 Census (revised for Camden, Islington and Tower Hamlets), © ONS Crown Copyright.

⁷ Source: ONS Vital Statics, © Crown Copyright

borough⁸. Two thirds of births in Camden were to women born outside the UK (64%).

- 3.8 The 2011 Census found that around 30% of Camden residents were married and 0.9% were in a civil partnership⁹. In 2016 1,377 marriages or civil partnerships took place in Camden – of these 96 (7%) were marriages of same sex couples, a higher percentage than nationally (3%) and in London (4%)¹⁰.
- 3.9 Statistics about the size of the LGB population vary considerably and there is no single accepted measure. The 2018 GP Patient Survey found that 9.3% of Camden residents surveyed identified as Lesbian, Gay, Bisexual or 'Other' – above the London average (5.7%) and the national rate (3.5%)¹¹. Figures from the 2017 Annual Population Survey give lower estimates for both London and England (3.2% and 2.7%)¹².
- 3.10 The Government Equalities Office tentatively estimates that around 0.3-0.8% of the UK population are transgender. In Camden this would equate to between 700 to 2,000 people. Since the Gender Recognition Act came into force, only a small minority have obtained a Gender Recognition Certificate¹³: 0.007% of the UK population (4,910 people across the UK since 2005).
- 3.11 The Lone Parent population in the borough is 6.4% of households. The proportion of households where English is not the first language is 14.4%.

Cantelowes Ward Population Profile

- 3.12 Cantelowes ward is located geographically to the centre of Camden. It is bordered to the north by Kentish Town ward; to the west by Camden Town with Primrose Hill ward; to the south by St Pancras and Somers Town ward; and to the east by the London Borough of Islington.
- 3.13 This profile has been collated using local-level data relating to a mix of data sets ranging from the 2011 census and in some cases with various updates. A variety of statistical sources, both national and local, have been used in its compilation.
- 3.14 The resident population of Cantelowes ward at mid-2017 was 12,800 people, ranking 13th in the borough by population size. The population density is 169 persons per hectare, ranking 6th highest in Camden, compared to the Camden average of 110 persons per hectare. Since 2011, the population of Cantelowes has

⁸ Research suggests the number of female students account for a quarter of females of child-bearing age resident in Camden.

⁹ Source: 2011 Census table KS103EW, © ONS Crown Copyright.

¹⁰ Source: ONS Vital Statics, © Crown Copyright. Note – marriages that occurred in Camden, not necessarily where celebrants reside.

¹¹ Source: Public Health England modelled estimates of the size of the lesbian, gay and bisexual (LGB) population, © PHE

¹² Source: Annual Population Survey estimates of the size of the lesbian, gay and bisexual (LGB) population, © ONS

¹³ Transgender people can change their legal gender by meeting a series of conditions as set out in the Gender Recognition Act 2004. They then receive a Gender Recognition Certificate (GRC), by which their birth certificate is changed.

not grown in line with the overall population of Camden (at 7.3% compared with 9.0%), ranking 12th on percentage growth since 2011.

- 3.15 Cantelowes is forecast to grow by 1,400 residents (10.9%) over the next 10 years to 2027. The components of population change show a positive natural change (more births than deaths) over the period of +900 and a net increase due to migration of +500. Births in the wards are forecast to continue at a similar level of 140 a year to 160 a year to 2027, while deaths continue at a similar level of 50 a year.

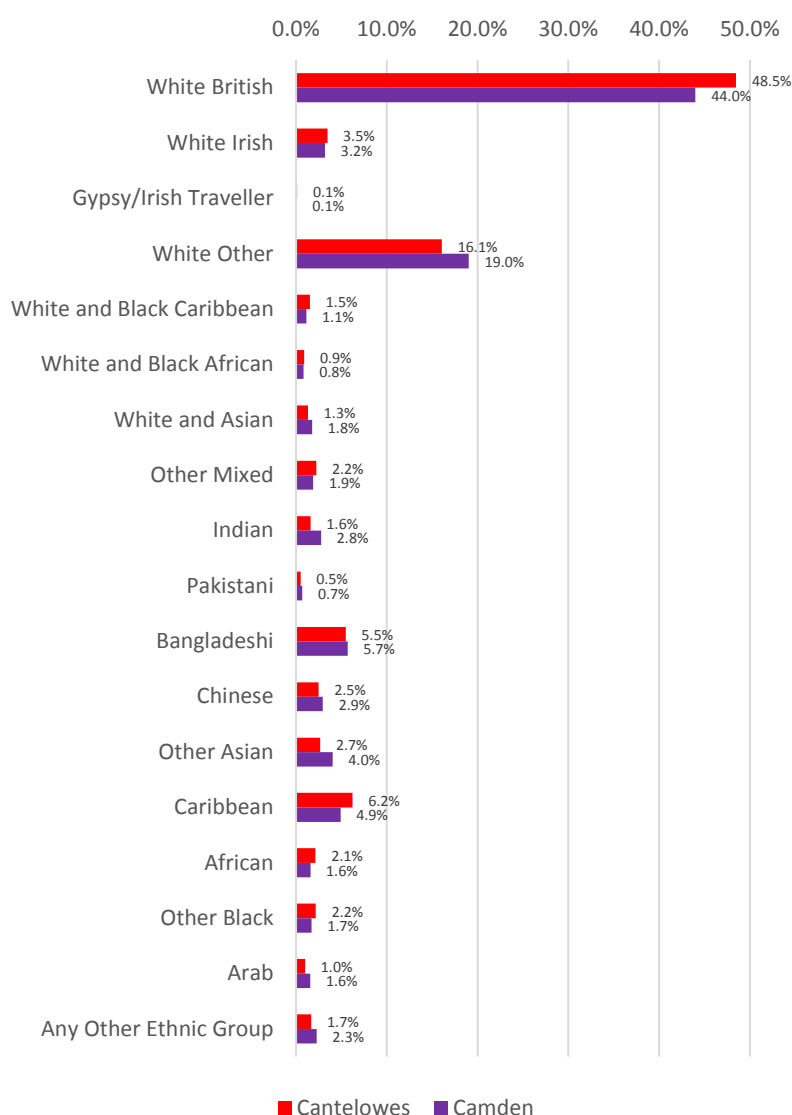
Chart 1: Cantelowes and Camden Ethnicity % Profiles 2011

- 3.16 The ward has a similar ethnic profile to that of the borough as can be seen in the chart opposite.

- 3.17 The 2011 census shows that the Ethnic minority population was 51.5% compared to 56% in the borough and the BAME population was 31.9% compared to 33.7% in the borough.

- 3.18 The census identified that in Cantelowes the percentage of those not born in the UK were 35.9% compared to 42.5% in the rest of the borough. Those who did not have English as their first language were 12.6% and 14.4% in the rest of the borough.

- 3.19 Population data for 2015 shows that the % of children aged 0-15 was 14.8% in Cantelowes and 15.4% in Camden. The working age population (16-64) was 75.4% in Cantelowes and 73.4% in Camden and those over 65 years of age were 9.5% compared to 11.2% in the borough.



- 3.20 In 2011 in Cantelowes Ward the largest faith/religions group was Christian with 36.3% of those included in the census, followed by 13.4% Muslim, with 37% stating they had no religion and 9.3% were not stated.
- 3.21 From a disability perspective 15.1% of the population in Cantelowes identified in the 2011 census that they had a limiting long term illness compared to 14.4% in the borough. Lone parent households made up 7.6% of the population in Cantelowes as compared to 6.4% in Camden.
- 3.22 Estimates of equivalised household income for 2016¹⁴ show that median gross household income in Camden was £36,851, 18% higher than the London average (£31,277). There are wide differences across Camden wards, ranging from £22,819 in St Pancras & Somers Town to £51,873 in Frognal & Fitzjohns. Median household income in Cantelowes falls below average compared with Camden at £34,105 ranking 12th highest ward by average income.
- 3.23 Household income data matters because low household income is used as a proxy for poverty, with poverty being defined as when equivalised household income is below 60% of median household income in an area. While the CACI *Paycheck* data cannot be broken down to reveal more socio-economic details about the individual households, we know already from DWP Households Below Average Income (HBAI) local measures that relative poverty in Camden is above the average and that 31.9% of children live in households that are in poverty by this measure⁶. The same data expressed by ward suggests that 33.3% of Cantelowes children live in poverty, the 8th highest by ward.
- 3.24 In November 2016 there were 1,150 working aged benefits claimants in Cantelowes, 11.5% of the working aged population¹⁵, compared to the Camden average 9.6%. Since November 2011, the number of claimants in Cantelowes has reduced by 335 (-23%). In November 2016, the highest proportion of working age population claiming benefits claimed ESA or Incapacity Benefit (7.0%), followed by carers (1.4%) and job seekers (1.1%).

Profile of the Current Residents at Camden Road Hostel

- 3.25 Camden Rd is a female only hostel with a 25 bed capacity. As of June 2020, there are currently 19 residents in occupation at Camden Rd Hostel. Equality analysis of records held by the council indicate the following profile of protected characteristics.
- 19 (100%) are female
 - 7 (37%) are BAME of which (1x Asian, 1 x mixed White/Asian, 1 x mixed White/Black, 4 = Black British).

¹⁴ Equivalised Paycheck household income data for 2016, © CACI Ltd. Equivalising reflects the notion that, for example, a household of five will need a higher income than a single person living alone to enjoy a comparable standard of living. CACI calculate an 'equivalence value' for households, based on the number and age of household members. Equivalised income is calculated by applying the equivalence value to the Paycheck income data.

¹⁵ Percentages of population receiving state benefits have been calculated using populations aged 16-64 for both men and women. The age at which women reach State Pension age is gradually increasing from 60 to 65 between April 2010 and April 2020. Hence, until April 2020, some women included in the population figure are not eligible to be part of the count of working age benefit claimants. There will be some time series discontinuity over this period, with trends partly reflecting the changing eligibility criteria. DWP, 2017.

- 6 (32%) are White British, 4 (21%) are White Other, 1 (5%) is White Irish (there is no ethnicity data available for 1 resident).
- 6 (32%) are under 25, 5 (26%) are aged 25-34, 6 (32%) are aged 35-59 and 2 (10%) are over 60.
- 16 (84%) are heterosexual, 1 (5%) is lesbian (there is no sexual orientation data available for 2 residents).
- 1 (5%) is Muslim, 3 (16%) is Christian, 1 (5%) is Buddhist, 3 (16%) have no religion (there is no religion or belief data available for 11 residents)
- None of the residents are pregnant
- There are no trans gendered people in the Hostel
- The temporary accommodation team have stated that 36.3% of current residents have a disability related to physical, learning or mental health.

Establishing the future protected characteristic profile of Camden Road

- 3.26 To ascertain the likely profile of residents in the new Camden Road hostel is quite difficult. Nonetheless there is a possibility to use proxy measurements. Camden currently hold data for residents at England's Lane Hostel as well as holding profiles of those families in temporary accommodation. Using these profiles may provide an indication of the range of protected characteristics that will be likely to present at the new Camden Road Family hostel.

England's Lane Residence (ELR)

- 3.27 The occupants of ELR are vulnerable pregnant women and/or lone parents. A full EIA of the closure of that site will be needed if only because this client group clearly come under the sex and pregnancy/maternity protected characteristics.
- 3.28 There are currently 119 households resident at ELR made up of 165 adults (heads of household plus some partners and non-dependent children) and 139 children, 304 people in total. The age profile of the residents is:
- 139 (46%) under 18 (all the children)
 - 80 (26%) aged 18-34
 - 38 (13%) aged 35-59
 - 1 (0.3%) aged over 60
 - 46 (15%) unknown age (no age recorded for partners/non-dependent adults)
- 3.29 The borough only hold data on other equality characteristics for the 119 heads of household:
- 103 (87%) are female
 - At least 80 (67%) are BAME (no ethnicity data available for 22 people)

Family Residents in Camden's Temporary Accommodation

- 3.30 Data from the borough's Northgate Housing management system has been reviewed over the last 10 years to identify the overall profile of families in temporary accommodation. It was felt that this would provide a relevant proxy

measurement of the proportion of different protected characteristics that are most likely to be housed the new hostel units.

3.31 The data available to this EqIA shows that:

- 22% of tenants are male and 78% of tenants are female, showing a significant focus of female occupants of temporary accommodation.
- 79% of family households were ethnic minority and 63% were BAME. This suggests a high proportion of people from Ethnic Minority and BAME communities. Significant populations within this profile include Black African 15%, White Other 11%, Bangladeshi 8%, Black Caribbean 5%, Arab 5%, Somali 5%, Other Ethnic Group 5%.
- From a sexual orientation perspective 10% of those that responded stated they were LGBTQ although some 60% of the sample refused to respond to this voluntary question.
- 25% of households were with dependent children (including newborn and maternity), 38% were with dependent children under 5 was and 29% were with dependent children over 5. The remaining 8% was made up of non-dependents.
- The proportion of households that were lone parents was 67%.

Camden's Adult Homelessness and Rough Sleeping pathway


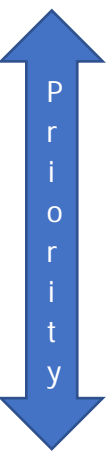
3.32 Camden provides hostels and supported accommodation for single homeless vulnerable adults through its Adult Pathway (there are two additional pathways: Mental Health and Young People). Camden is a borough with a historically high level of hostel and supported housing provision. The service currently provides 643 beds across 16 services for single homeless people with support needs, rough sleepers, people with substance misuse and/or mental health issues, offenders and women escaping domestic violence and abuse.

3.33 The services are provided by housing associations, voluntary organisations and the Council. Each resident is assigned a key worker supporting them from assessment to move-on on the journey to independence. The key worker will agree a Support Plan with each resident and carry out a risk assessment.

3.34 Each year the Adult Pathway services enable around 200 single homeless people with support needs to move on to independent accommodation. These services have been an essential part of the Council's homeless prevention and rough sleeping strategies for over ten years.

3.35 As well as accommodation, Pathway services provide support that is tailored to meet the individual and increasingly complex needs of residents who are helped to progress towards independence. This is done by engaging with services relevant to their needs and taking up opportunities or pathways to employment, training and education.

- 3.36 For residents supported to find accommodation in the private rented sector, the start of the tenancy includes a period of floating support to help them settle, access broader income maximisation and be referred into wider services.
- 3.37 For some households, homelessness cannot be entirely prevented or addressed through the provision of accommodation. Some will require a range of support services to sustain tenancies with some recovering from traumatic experiences such as domestic violence, addressing financial hardship, access to therapeutic mental and physical health care, ensuring access to the correct welfare benefits and to engage with education, training and employment support. It is a complex system of support with generalist and specialist services hence the importance of advocacy and casework support, particularly for those who have difficulty in engaging with mainstream services. Camden has a range of advocacy and support organisations working to support vulnerable individuals and households including Camden Advice Partners and Fulfilling Lives in Camden and Islington (FLIC).
- 3.38 Camden has high quality psychologically informed crisis intervention and support services for vulnerable households including floating support and Camden Safety Net Services (domestic violence). Camden has women-only provision within the Adult Pathway and works with partners to support single homeless women. This includes Women's Safe Space clustering.
- 3.39 The single homeless people's pathway is different to the families in temporary accommodation. However, in some cases they exhibit similar needs and vulnerabilities. There are a range of vulnerabilities that are significant for both single homeless people and for homeless families, nb these have been listed in order of priority by staff within the pathway to identify the highest prevalence of each vulnerability within each respective population.

Single Homeless People Vulnerabilities	Homeless Families Vulnerabilities
 <ul style="list-style-type: none"> • Alcohol abuse • Drug abuse • Mental health needs • Benefit access • Income maximisation • Violence • Domestic violence (Women) • Debt and financial management 	 <ul style="list-style-type: none"> • Debt and financial management • Welfare benefit access • Safeguarding (Child Protection Plans) • Parenting and family support needs • Domestic violence • Mental health needs • Health and well being • Some substance misuse

- 3.40 Camden Road is going to be a Family Hostel and hence will address the needs of families who are in Camden's temporary accommodation.

4 Equality Impact Assessment

- 4.1 This section incorporates analysis of key data to assess the regeneration proposals for Camden Road Hostel in light of the ways in which they may affect existing and future users of the hostel and how this impacts on the protected characteristics set out in the Equality Act 2010. It seeks to address the key lines of questioning as set out in Camden Council's Equality Impact Assessment Form.

Aims of the proposal (What is changing and why?)

- 4.2 The Camden Road Hostel regeneration proposals seek to demolish the existing building on site, which provides a 25 bed female hostel and which has become tired and in need of structural repair. It is proposed that this will be replaced with a six storey building that will provide 39 high quality homes for much needed family accommodation. This will include 36 studios units, 2 x 1-bedroom units and 1 wheelchair accessible home with windows facing both the main road and the rear garden.
- 4.3 The existing occupants of the hostel will be decanted to other recently developed single person units around the borough or supported into other housing options.
- 4.4 The construction period of the scheme will last between initial consultation in May 2020 with the submission of a planning application in June 2020, planning decision in August 2020, commencement of construction Spring 2021 and the conclusion of construction in Autumn 2021.
- 4.5 To this end the EqIA will review the regeneration proposals currently under consideration in terms of:
- The likely and actual benefits for the regeneration proposals
 - Recognition of the negative/adverse impacts of the regeneration process
 - An appraisal of impacts on residents in the existing building with protected characteristics
 - An appraisal of the residents of the new building by their likely protected characteristics
 - An assessment of the direct and indirect impacts of the regeneration programme and their proportional or disproportional distribution between different protected characteristics
 - An assessment of any direct or indirect forms of discrimination that may result from this scheme

Objective Justification for the Scheme

- 4.6 Central to the objective justification for this regeneration scheme is:
- the borough's need to provide more family units within its hostel provision
 - the need to enhance the volume of provision across the borough in line with the Homelessness and Rough Sleeping Strategy 2019-2024
 - the requirement to upgrade the existing building and the cost implications of rebuilding the site to provide the appropriate accommodation.

- The importance of increasing the managed hostel space run and provided by the borough and making it more cost effective.

4.7 In summary the Objective Justification for the decanting, demolition and rebuilding of the Camden Road Hostel is the critical requirement to increase the volume of family units that homeless families can access to provide them with temporary accommodation. The Camden Road site provides an opportunity to build family unit hostel space that is critically needed and which directly aligns to the Homelessness and Rough Sleeping Strategy 2019-2024.

Relevance to the General Duty

4.8 The potential impact of the decanting, demolition and re-building of the Camden Road Hostel Scheme will have impacts and consequences for many of those involved. As such this will need to be reviewed under the council's General Duty as set in the Equality Act 2010. Moreover, where feasible this EqIA will review the potential impact that this will have on particular protected characteristics and where feasible to address the likely proportional and or disproportional impacts that will result from the scheme.

4.9 The table below sets out the key components of Camden Road Hostel's redevelopment proposals as described in the Cabinet Report. It seeks to describe generic impacts of the project and to draw from that likely equality impacts.

Regeneration activity, programme rationale, regeneration consequences and likely equality impacts.

Activity planned	Programme Rationale	Regeneration consequences	Likely Equality impacts (Positive and Negative)
Needs Assessment	This is a central driver to establish the need to increase the number of Family Housing units and to decant and demolish the existing building and to re-develop and make the necessary investment required to unlock the Camden Road Hostel scheme	<ul style="list-style-type: none"> ▪ Identified need set out in the Homelessness and Rough Sleeping Strategy 2019-2024 ▪ Council's current portfolio of temporary accommodation for homeless families has an oversupply of small units resulting in a high rate of unoccupied rooms and spot purchasing of expensive nightly paid annexe units outside of the borough. The strategy states that it will create temporary accommodation in the borough so that it better meets the needs of homeless families. 	<ul style="list-style-type: none"> ▪ This will provide for more Family units in the borough's temporary accommodation portfolio ▪ There is a general sense of stress, anxiety and disturbance for those existing residents of Camden Road although there is a commitment that all will be rehoused in additional single person accommodation developed in other units in the borough and out of borough.

Activity planned	Programme Rationale	Regeneration consequences	Likely Equality impacts (Positive and Negative)
Provision of temporary accommodation for families in need	Homelessness and Rough Sleeping Strategy 2019-2024	<ul style="list-style-type: none"> ▪ The strategy has identified the redevelopment of two Camden owned hostel sites in the borough with larger accessible studio/one-bedroom units better suited to families' needs. ▪ London School of Economics commissioned research into the experience of families living in temporary accommodation uncovered concern about placements out of borough and the impact on their children's health growing up within a confined space. There was a strong preference for temporary housing options to be in Camden with access to local schools and family networks 	<ul style="list-style-type: none"> ▪ The planning of temporary accommodation in the borough has been highlighted in the Homelessness and Rough Sleeping Strategy 2019-2024. ▪ The development of Camden Road will contribute to the expansion of 39 housing units for families which is deemed as a critical need to support a wide range of equality groups.
Decanting of existing occupiers	The existing residents (Female only) of Camden Road will be decanted and transferred to other recently developed single person units in the borough.	<ul style="list-style-type: none"> ▪ Camden Road currently provides for up to 25 single homeless women. ▪ The women on site will be required to relocate to either other single person hostel units or will be supported through the pathway to other forms of independent accommodation. 	<ul style="list-style-type: none"> ▪ There is a potential loss of a dedicated female only hostel ▪ The women currently housed in Camden Road will be supported into either other forms of independent housing or be relocated to other single person hostel units in other parts of the borough.

Activity planned	Programme Rationale	Regeneration consequences	Likely Equality impacts (Positive and Negative)
Construction	The programme is using a precision design and offsite manufacturing to construct most of the hostel in a factory.	<p>The key regeneration consequences of this approach are to</p> <ul style="list-style-type: none"> ▪ Significantly reduced site works minimizing adverse noise, air and quality of life impacts to residents. ▪ High environmental / sustainability benefits: extremely low construction and material waste in comparison to traditional development; significantly reduced vehicle trips/deliveries to site; high thermal performance requiring minimal energy inputs for heating and reduced annual running costs. ▪ Efficiency of production and quality control within a factory environment which reduces works on site. 	<ul style="list-style-type: none"> ▪ Potential loss of local labour in the site construction process, although other trades will be employed to construct the building once the prefabricated sections are brought to site. ▪ From a General Duty perspective there will be a need to assess the equality and diversity profile of the workforce both in terms of the manufacture and onsite construction of the building.
Project review and evaluation	<p>Assessment of the equality impact of the construction and site management process</p> <p>And</p> <p>Assessment of the equality impact for the existing and future residents of the building</p>	<p>Evaluation of the impact of the scheme can be broken down in terms of:</p> <ul style="list-style-type: none"> ▪ Manufacturing of the building off site ▪ Construction of the building on site <p>Evaluation of the programme's impact in terms of addressing the Council Homelessness and Rough Sleeping Strategy will include:</p> <ul style="list-style-type: none"> ▪ Assessing the outcomes for those current residents of the site ▪ Assessing the outcome of the future beneficiary families being housed in the new purpose-built accommodation. 	<ul style="list-style-type: none"> ▪ There is a need to assess the impact of the scheme through evaluation and in particular to record the protected characteristics of both the workforce in use in the manufacturing and construction of the building and in the future beneficiaries of the family housing on the new site.

Camden Road Hostel Equality Impact analysis in summary

- 4.10 As part of this analysis and for each characteristic this EqIA has indicated the type of impact (i.e. positive, negative, positive and negative, none, or unknown). This EqIA seeks to explain these impacts. Data and evidence collected including from surveys has been incorporated.

Ethnicity: EqIA Findings

Context:

- 4.10.1 Camden has one of the highest ethnic minority populations in the country (56.0% in 2018 compared to 20% in England in 2011). The borough has a white other population of 19.0%, a Black, African/Caribbean/Black British population of 8.2% compared to England at 3%, an Asian/Asian British population of 16.1% compared to England at 8% and a 3.8% other ethnic group population compared to England at 1% and a mixed ethnic group of 5.6% compared to 2% in England. The Borough's BAME population is 33.7%. Cantelowes has a slightly lower level with 51.5% ethnic minority and 31.5% BAME.

Racial profile of the Site

- 4.10.2 The existing population in Camden Road's ethnic profile is 63% ethnic minority and 37% BAME. Hence the residents represent strong levels of racial diversity.
- 4.10.3 The racial profile of families currently in temporary accommodation in Camden is 79% ethnic minority and 63% BAME. Far higher than the borough and the ward levels. This would suggest that the proposals would benefit Ethnic Minority and BAME communities.

Assessment

- 4.10.4 The fact that those that are currently living on site will need to leave Camden Road Hostel prior to development and that they will need to be rehoused in other hostel accommodation and or in other housing provision will have a likely negative impact. The requirement to leave and relocate will cause anxiety and concern but this is compensated for by the offer for alternative accommodation.
- 4.10.5 There will be no reduction in provision, indeed additional single person provision has already been developed. In fact, their decanting from the

site will unlock the scheme and this will have greater benefits going forward and many of these beneficiaries will be ethnically diverse families.

- 4.10.6 However, their departure will have a consequentially beneficial impact for the wider homeless community and in particular families and this will enable the development of Camden Road Hostel.
- 4.10.7 From the evidence gathered there are no direct negative impacts from a race perspective. However, there are proportionally higher numbers of existing residents that are from ethnic minority backgrounds that will be exposed to relocation and thus the following potential forms of mitigation should be considered.

Potential mitigation actions:

- To review the individual needs of all existing residents at Camden Road and prepare a personal support plan and risk assessment.
- To ensure that the council's Homelessness Accommodation Policy and Placement Policy are applied consistently in the allocation of these units

Gender: EqIA Findings

Context

- 4.10.8 Camden's gender split is 50.6% male and 49.4% female¹⁶. The percentages of male and female residents in Cantelowes ward are 48.5% male and 51.5% female¹⁷.

Gender profile of the site

- 4.10.9 Camden Road hostel has up until now been an all-female hostel.
- 4.10.10 The gender profile of families currently in temporary accommodation in Camden is 22% Male and 78% Female. This shows that 4 in 5 adults on a Temporary accommodation tenancy are female.

Assessment

- 4.10.11 The fact that the women currently living on site will need to leave Camden Road Hostel prior to development and that they will need to be rehoused in other hostel accommodation and or in other housing provision will have a likely disproportional and negative impact. The requirement to leave is wholly placed on female residents and the need to relocate will cause

¹⁶ Source: GLA 2017-based Projections 'Camden Development, Capped AHS', © GLA, 2019 at mid-2019

¹⁷ National = England & Wales. Source: 2011 Census Tables P04, P05 and P06, © ONS Crown Copyright, 2012

anxiety and concern but this is compensated for by the offer for alternative accommodation.

- 4.10.12 However, their departure will have a consequentially beneficial impact for the wider homeless community and in particular families and this will enable the development of Camden Road Hostel. There will be no reduction in provision, indeed additional single person provision has already been developed, although it is not in units that are women only. In fact, their decanting from the site will unlock the scheme and this will have greater benefits going forward and many of these beneficiaries will be women and in particular single homeless mothers with children.
- 4.10.13 From the evidence gathered there are no direct negative impacts from a gender perspective. However, there are proportionally higher numbers of existing residents all of whom are women that will be exposed to relocation and thus the following potential forms of mitigation should be considered.

Potential mitigation actions:

- To review the individual needs of all current female residents at Camden Road and prepare a personal relocation/rehousing plan.
- The council through its Homelessness and Rough Sleeping strategy to continue to support all women to progress along the Adult Pathway to independent housing.

Gender re-assignment: EqIA Findings

Context:

- 4.10.14 Borough wide data for people going through or having gone through a transition is not available.

Gender re-assignment profile of the site

- 4.10.15 There were no residents on site that were undergoing or who had undergone a transition.

Assessment

- 4.10.16 It is arguable whether trans-gender is a characteristic that is pertinent to this regeneration scheme, particularly as current residents are female and future residents are families.

- 4.10.17 From the evidence gathered there are no direct negative impacts from a gender re-assignment perspective.

Disability: EqIA Findings

Context:

- 4.10.18 The most reliable data to quantify the level of the disabled population in any area is that from the 2011 Census. The question asked in the Census was: Are your day-to-day activities limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months? In Camden, this figure at the 2011 census was 14.4% and in Cantelowes Ward this figure was 15.1%.

Disability profile of the site

- 4.10.19 Evidence from the Homelessness Service shows that 36% of residents at Camden Road have a disability/life limiting long-term illness.
- 4.10.20 Evidence from the Homelessness Service shows that 10% of family residents in temporary accommodation in Camden have a disability/life limiting long-term illness.
- 4.10.21 The regeneration proposals do not manifest in a way so as to impact particularly on disabled people. The proposed future units in the plans for new accommodation at Camden Road show the provision of a dedicated wheelchair accessible home.

Assessment

- 4.10.22 The scheme has designed into it the provision of one dedicated wheelchair accessible home. This represents one of 39 units that will be provided (2.5% of the units available).
- 4.10.23 Wheelchair access is likely to accommodate physical disabilities where the person is not ambulant. Other disabilities including sight impairment, hearing loss, learning disabilities etc may need to be considered. The access levels of the new units are an improvement on the England's Lane unit, particularly accommodating buggies.
- 4.10.24 The Scheme's proposals do not manifest in a way so as to impact on disability. Thus, the assessment finds that there are no direct negative impacts identified from a disability perspective.

Future mitigation opportunities

- 4.10.25 To secure the needs of disabled people the units within the hostel should meet Part M of the Building Regulations.

Age: EqIA Findings

Context:

- 4.10.26 Camden has a relatively young population. In 2019, the median age of the population is 38 – two and a half years younger than the England average. The population is expected to have a higher proportion of older residents in the future: the number of residents aged 65+ is expected to increase by more than three quarters (+72%) between 2019 and 2039 – an increase of 22,800 older residents¹⁸.
- 4.10.27 Population data for 2015 shows that the % of children aged 0-15 was 14.8% in Cantelowes and 15.4% in Camden. The working age population (16-64) was 75.4% in Cantelowes and 73.4% in Camden and those over 65 years of age were 9.5% compared to 11.2% in the borough.

Age profile of the site

- 4.10.28 In the existing population in Camden Road, the age profile is 90% 16-65 and 10% over 65.
- 4.10.29 The age profile of children within families shows that 63% are with dependent children under 5 including maternity, 29% with dependent children over 5 being provided with temporary accommodation

Assessment

- 4.10.30 The increasing volume of younger children will place a need to address the outdoor recreational space and play space for younger members of the families due to occupy the new hostel units.
- 4.10.31 The Scheme's proposals do not manifest in a way so as to impact on age. Thus, the assessment finds that there are no direct negative impacts identified from an age perspective.

Potential mitigation actions:

- To ensure that younger residents in the new units have access to recreational space in the rear garden of the site.

¹⁸ Source: GLA 2017-based Projections 'Camden Development, Capped AHS', © GLA, 2019.

Sexual Orientation: EqIA Findings

Context:

- 4.10.32 There is only a limited amount of information on sexual orientation of the general population available. There are national survey samples that have generated a series of estimates. The 2018 GP Patient Survey found that 9.3% of Camden residents surveyed identified as Lesbian, Gay, Bisexual or 'Other' – above the London average (5.7%) and the national rate (3.5%)¹⁹.

Sexual orientation profile of the workforce on the site:

- 4.10.33 The existing population in Camden Road, the sexual orientation profile shows 5% are LGBTQ.
- 4.10.34 The sexual orientation profile of families provided with temporary accommodation shows 10% have declared themselves as LGBTQ.

Assessment:

- 4.10.35 From a regeneration perspective the impacts are likely to be applied equally to both the heterosexual population as to the LGBTQ populations.
- 4.10.36 The regeneration proposals do not manifest in a way so as to impact on a person's sexual orientation and therefore this characteristic is irrelevant to this EqIA.
- 4.10.37 From the evidence gathered there are no direct negative impacts from a sexual orientation perspective

Religion and belief: EqIA Findings

Context:

- 4.10.38 Data for religion in Camden is sourced from the 2011 Census. This states that Christianity is the most common religion in the borough in all its different forms (38.5%). 13.8% of residents are of the Muslim faith, and 29.1% hold no religion or belief at all. In Cantelowes Christianity is the most common religion in all its different forms (36.3%). 13.4% of residents are of the Muslim faith, and 37.0% hold no religion or belief at all.

¹⁹ Source: Public Health England modelled estimates of the size of the lesbian, gay and bisexual (LGB) population, © PHE

Religion and belief profile of the site:

- 4.10.39 The level of recording of the faith and religion of current residents of Camden Road is insufficient to provide meaningful data.
- 4.10.40 The data setting out the faith/religious profile of families being provided with temporary accommodation in Camden is not available at the time of this EqIA.

Assessment:

- 4.10.41 The decanting of the existing residents is universal irrespective of their faith. Moreover, the allocation of accommodation at the new hostel is not faith specific. On this basis there are no discernible negative impacts which are seen to be a result of religion and beliefs.
- 4.10.42 From the evidence gathered there are no direct negative impacts from a religion/belief perspective.

Pregnancy and maternity: EqIA Findings**Context:**

- 4.10.43 In 2017, there were 2,607 live births in Camden, giving a total fertility rate (TFR) of 1.17²⁰ - the lowest fertility rate in England, but likely associated with the high numbers of female university students who live in the borough²¹. Two thirds of births in Camden were to women born outside the UK (64%).
- 4.10.44 Lone parent households made up 7.6% of the population in Cantelowes as compared to 6.4% in Camden.

Pregnancy and Maternity profile of the site:

- 4.10.45 There are no members of the current population in Camden Road, that are either pregnant or in the first 6 months of maternity.
- 4.10.46 The lone parent profile of families being provided with temporary accommodation in Camden shows 67%.

Assessment:

- 4.10.47 Pregnancy/Maternity is a criterion of 'vulnerability' that will apply to someone seeking temporary accommodation. Moreover, the volume of single parents in temporary accommodation is 67%. For those presenting

²⁰ Source: ONS Vital Statics, © Crown Copyright

²¹ Research suggests the number of female students account for a quarter of females of child-bearing age resident in Camden.

as pregnant there will be a statutory duty to house under Homelessness legislation and will be provided with access to temporary accommodation.

- 4.10.48 There is little evidence that there will be any direct or indirect equality impacts on the grounds of pregnancy and maternity. Indeed, any impact is likely to be positive. As a consequence, there are no direct negative impacts identified from a Pregnancy/Maternity perspective.

Marriage & Civil Partnership: EqIA Findings

Context:

- 4.10.49 The council recognises gay relationships and civil partnerships with respect to household composition.
- 4.10.50 There was no data collected on Marriage/civil partnership status of the residents currently on site although as such they were all perceived to be single female residents.

Assessment

- 4.10.51 The marital status of families seeking temporary accommodation is not an identifying factor. Unmarried partners with children are still provided with temporary accommodation if they state they are a family.
- 4.10.52 The regeneration proposals do not manifest in a way to impact on the grounds of Marriage or civil partnership. However, by providing for family units in the new scheme it is likely that there will be a positive equality impact for this group.
- 4.10.53 From the evidence gathered there are no direct negative impacts from a marriage/civil partnership perspective.

Language: EqIA Findings

Context:

- 4.10.54 The impact of the regeneration proposals on residents who do not speak English as a primary language may well be significant. The proportion who state that English is not their first language in Camden²² is 14.4% and in Candelows this is 12.6%

²² Census 2011

Language profile of the site:

- 4.10.55 Re the existing population in Camden Road, the proportion of households where English is not their first language is not known.

Assessment

- 4.10.56 Language, on its own, is not likely to have any significant equality impacts as a result of the regeneration programme itself other than the ability to effectively communicate and understand the implications of the regeneration process as it applies to different residents, the local community and future residents.

Mitigation

- 4.10.57 It is critical that for all these groups there is adequate translation and or interpretation to support existing residents to be aware of their future housing needs/options, to effectively consult with local communities and to support new family residents through their journey to independent accommodation.

5 Summary of Key Findings

- 5.1 It is proposed that Camden Road Hostel will undergo a complete redevelopment with the decanting of the existing building, demolition and the rebuilding of 39 purpose build hostel units consisting of 36 x studio units, 2 x 1 bed units, 1 x 1 bed wheelchair adapted unit.
- 5.2 The accommodation has been designed to provide users with modern, fit for purpose premises that include fully fitted out kitchen and bathroom facilities together with essential amenities. These include cooking hobs, microwave ovens, fridge/freezers and washer/dryers. Additionally, all units will have access to Wi-Fi, space for storage and loose furniture such tables, chairs and beds. The new facilities will also provide much improved communal and outdoor amenity spaces for families to enjoy and spend time in.
- 5.3 The current population based at Camden Road is made up of single females whose headline protected characteristic profile shows, 63% ethnic minority and 37% BAME, 90% aged 18-59 and 10% over 60. However, the future use of the new units will be with families in temporary accommodation. Their needs are likely to be different to those of single people male or female.

Relevance of the Hostel to specific client needs

- 5.4 The needs and vulnerabilities of the borough's homelessness pathway residents both in Camden Road as it is currently (Female adult) and in future (Families) is both complex and critical to their capacity to sustain their tenancies. This means that support is essential to securing the outcomes that the service is set up to deliver, i.e. a pathway to independent living.
- 5.5 The kinds of support provided by the pathway, include rent and tenancy support, advice and guidance, support with accessing benefits and specific support appropriate to need including drug and or alcohol treatment, health and wellbeing, mental health support, employment, education and training, parenting (where appropriate), financial and debt management, therapeutic and traumatic support. The support is enabled through a blend of advocacy and case work with a wide range of specialist and generalist support agencies.
- 5.6 Equality and diversity needs are at the heart of all these support services and where feasible the pathway provision through its commissioned providers enables a safe and supportive environment free from discrimination, stigma and prejudice.
- 5.7 The pathway starts with an initial assessment carried out by the Housing Needs Team and then clients are referred onto the Temporary Accommodation team and specifically the Homelessness and Rough Sleeping Team. They are then supported through their hostel/temporary accommodation tenancy and then supported to move on following completion of the support. Assessments are carried out throughout the time the resident occupies a hostel bed/home. The resident's support plan and risk assessment are critical features of this pathway approach.

Generic Regeneration consequences

- 5.8 The development of Camden Road Hostel is a vital scheme to extend the volume of offer for families following the impending closure of England's Lane Residence. Indeed, with the development of Chester Road Hostel there is going to be a further 89 units brought into service.
- 5.9 The consequential impact is for the borough to be able to house families in purpose built high quality family hostel units is critical and in so doing it will replace England's Lane Residence with far higher specifications and more appropriate family dwellings.
- 5.10 This is clearly an overall beneficial impact. Not only does it fulfil the aspirations of the Homelessness and Rough Sleeping Strategy, it also secures through the borough's allocation process the ability to provide families with the potential to achieve independent living by securing a foothold in the housing market before they move on to other housing options.
- 5.11 Equalities monitoring implications borough, ward, existing and future users shows a high proportion of BAME residents in the locality and across the borough. From a housing needs perspective there are equally high levels of BAME residents in the adult homelessness pathway and in temporary accommodation. From a lone parent perspective there are high levels of lone parent homelessness families in temporary accommodation. This is further clarified in the section below.

Positive impacts

- 5.12 It is difficult to substantiate all the positive impacts likely to accrue from the redevelopment of Camden Road Hostel. However, this is summarised by the following key impacts:
- 39 new homes, built to high quality hostel specifications providing accommodation for families providing up to 120 bed spaces
 - Each unit will be to a high specification including a fully fitted out kitchen and bathroom facilities together with essential amenities
 - Amenity space to the front and rear of the building
 - Provision of a new building designed to blend into its local environment
 - Targeting needs of families with children who are from a protected characteristic are likely to be made up of:
 - 70% of households are likely to be occupied by Female Tenants
 - 87.6% are likely to be providing for Ethnic Minority Families and 74.3% BAME
 - 63% with dependent children under 5 including maternity and 29% with dependent children over 5
 - 10% LGBTQ
 - 67% of household led by lone parents

- 5.13 From an equalities perspective it is most likely that these regeneration benefits will be shared across all protected characteristics.

Support for families

- 5.14 The families in temporary accommodation do receive support. Their needs are reviewed, initially at the commencement through an assessment and a 'support and risk assessment' plan, and then through a 'moving on' plan. All this work is governed by the relevant housing policies and these should have all undergone equality impact assessments.
- 5.15 The allocation of housing is governed by the Homelessness Allocation Policy which has itself undergone an equality impact assessment. It is critical that this allocations policy is adhered to and that decision are made objectively and fairly reflecting the requirements of the policy.

Value of the regeneration proposals

- 5.16 The value of the regeneration of the Camden Road site is universally seen as having benefits for all including the service beneficiaries, the families being housed and the wider community who should experience a more family orientated set of new neighbours.
- 5.17 Almost universally the scheme is seen as having positive benefits. Indeed, the service itself is not different to what is being provided at England's Lane Residence but with much better quality of housing and much better facilities for residents.
- 5.18 Access both within the building and within the new units will be much better and certainly surpassing the poor access within England's Lane Residence.
- 5.19 The only likely negative impact to the redevelopment of Camden Road is the loss to the borough and to women within the borough of a dedicated women's only single person hostel. Whilst the women, currently in residence at Camden Road, will be moved to other single person units across the borough, the loss of a dedicated women's only facility will be hard to immediately replace. Women make up 25% of those who are homeless and seeking hostel accommodation. This is not an insignificant number and women will need some level of gender dedication both in the pathway services they receive and in the floating support they access.

Recommended Mitigations

- 5.20 There are however some mitigating actions that can be considered as options to apply some level of relief to these regeneration impacts and to safeguard the equality and diversity benefits of the scheme. Indeed, some of these mitigations can be more impactful for some protected characteristics than others.

Generic mitigation activity

- Consultation phase: ensure a wide cross section of the community representing all protected characteristics have access to the consultation

process and are encouraged to engage, particularly to ensure the availability of translated consultation materials

- Manufacturing phase: monitor the workforce equality profile of the providers manufacturing the building pre site assembly.
- Construction phase: to seek to work with local labour and or a workforce that reflects the Camden community
- Housing families in temporary accommodation: to ensure that the homelessness allocation policy is used to allocate accommodation in the new units thereby mitigating any forms of subjectivity and decisions made outside the agreed allocation policy

Equalities targeted mitigation activity

- To establish the needs of each family that takes account of their relevant protected characteristics
- To ensure that the construction workforce is reflective of local people
- To seek a profile of new residents of Camden Road to broadly reflect the equality and diversity profile of those families in temporary accommodation
- To establish equality and diversity monitoring systems for those in temporary accommodation that meets the 9 protected characteristics from the Equality Act 2010 with the addition of health, social and economic characteristics, lone parents and those where English is not the first language of anyone in the household.
- To ensure that all designs and access throughout the final designs meet nationally recognised inclusive design standards

6 Appendix 1: Key Definitions

Key Definitions

6.1 **Diversity** equals difference:

The concept of diversity encompasses acceptance and respect. This means understanding that every person, family and group in the Camden Estates Regeneration project is unique and has specific needs. The skill when offering services to individuals and groups is to take account of these characteristics sensitively and positively throughout this project.

6.2 **Equality** is the concept of knowing when to 'treat people the same' in this regeneration project and when to 'treat them differently'.

Often, we have policies, guarantees and standards which guide us to treat people the 'same' so that they receive their entitlements. But regularly in 2019 we are also faced with challenges to deliver individualised and tailored housing services to individuals, families and groups. The skill is to know when 'sameness or difference' applies and having a rationale to explain your actions.

6.3 **Inclusion** has been described as a sense of belonging.

A feeling of being respected, valued for who you are; feeling a level of support and commitment from others who consult and negotiate with you over important matters, so that your voice is heard as a tenant, leaseholder or owner of a property or homeless resident and you can then help, shape and make important decisions.

6.4 **Human Rights** are the basic rights and freedoms that belong to all of us from birth until death. Our right to live, eat, be clothed and to be respected for private and family life.

The act protects ordinary people's freedom, safety and dignity and helps us hold authorities to account when things go wrong. In Britain, these important international rights are protected by the Human Rights Act of 1998, which is now enshrined as part of UK domestic laws.

6.5 **Ethnic Minority**: is defined as people who differ in race or colour or in national, religious, or cultural origin from the dominant group of the country in which they live. For the purposes of this EqIA ethnic minority is used where people have not been defined as White British.

6.6 **BAME**: is the term long used in the UK to refer to black, Asian and minority ethnic people

7 Appendix 2: Equality Impact Assessments, introduction and context

7.1 This Equality Impact Assessment (EIA) has been commissioned as an independent report by LB Camden Regeneration team and it will focus on the key elements of the regeneration proposals for the Camden Road Hostel. It will address the equality impacts of:

- The key decisions required of Cabinet
- The regeneration proposals including community engagement, design, planning and phasing
- The provision of hostel units for temporary accommodation for families

What is an Equality Impact Assessment for?

7.2 The Council must have due regard to its Public Sector Equality Duty (PSED) when making decisions at member and officer level. An EqIA is the best method by which the Council can provide the evidential analysis to comply with the equality duty, particularly for major decisions. However, the level of analysis required should only be proportionate to the relevance of the duty to the service or decision. Some decisions will require detailed equalities consideration, e.g. a decision on adult social care provision or reduction of grants to voluntary organisations, whereas the performance of other functions will have less of an equalities impact, e.g. the appointment of committees where only a limited assessment is required. In rare cases, the Courts have said there may be no impact.

7.3 In the context of this regeneration programme a full independent Equality Impact Assessment has been deemed appropriate.

Equality Act 2010

7.4 The LB Camden - like all other public must meet the public sector equality duty (s.149, Equality Act 2010) which requires the Council, when exercising its functions, to have "due regard" to the need to:

- eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited under the Act,
- advance equality of opportunity between those who share a "protected characteristic" and those who do not share that protected characteristic and
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it (this involves having due regard, in particular, to the need to (a) tackle prejudice, and (b) promote understanding).

7.5 These are collectively referred to in this EqIA as the equality aims. Advancing equality (the second equality aim) involves having due regard, in particular, to the need to:

- Removing or minimising disadvantages suffered by people due to their protected characteristic

- Taking steps to meet the needs of people from protected groups where these are different from the needs of other people including steps to take account of disabled people's disabilities *and*
- Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low

NB, for disabled persons, the Council must have regard to the possible need for steps that amount to positive discrimination, to "level the playing field" with non-disabled persons, e.g. in accessing services through dedicated car parking spaces.

Equality Impact Assessments

7.6 This EqIA adopts the borough's model for EqIAs set by the borough's equalities policy leads. However, like most other authorities, Camden's EqIAs are a self-assessment tool to help look at the likely positive and negative impacts of the borough's work on staff, citizens, partners and communities regarding equality of opportunity, and promoting diversity in employment and service delivery.

7.7 Camden is one of the most diverse boroughs in the country and equalities is expressed through an ambition of fairness and the guiding values of equal opportunity and social justice. The protected characteristics and Camden's priority characteristics are set out below. Each of these protected characteristics where deemed relevant and appropriate will be assessed in this EqIA.

Chart 2: Protected Characteristics Equality Act 2010 + 3 additional Characteristics



7.8 The Equalities Impact Assessment will cover the following areas in the context of the council's general duty to:

- Address identified barriers
- Eliminate discrimination
- Promote equality of opportunity
- Promote good relations between different people

- Support employment opportunities
- Secure inclusive design

7.9 From a methodological perspective, the EqIA will focus on addressing:

- Likely regeneration programme impacts.
- Likely / expected equality impacts.
- Direct equality impacts.
- Indirect equality impacts.
- Proportionality of impact across protected characteristics/local characteristics including proportion and disproportional, thereby assessing proportional positive impacts and negative impacts and/or disproportional positive and negative impacts.
- As part of this process it is critical to enable the council to assess what it will undertake to address the outcomes of these assessments.
- This analysis will enable a process of prioritising these impacts, which will enable Camden the opportunity to choose options for the mitigation of negative impacts accordingly.

7.10 The regeneration scheme for the Camden Road Hostel will also operate within its own housing legislation and policy. To this end the EIA has reviewed:

- London Borough of Camden Strategic Housing Market Assessment Household Survey Results May 2017
- Homelessness and Rough Sleeping Strategy 2019-2024
- Camden's Housing Allocation Scheme (2016 – updated in 2018)
- Camden Homeless Young Peoples Protocol
- Camden Homelessness Accommodation Policy and Placement Policy
- National Planning Policy Framework
- London Plan
- Equal Life Chances for All, the Mayor's equality strategy revised in June 2014

7.11 Therefore, the EIA has sought to address the available and relevant context of the regeneration programme in Camden and the core housing policies and processes which impact on residents.

Community Investment Programme

7.12 The Community Investment Programme (CIP) is the council's ambitious 15-year plan to invest over £1 billion in schools, homes and community facilities in Camden.

It is an innovative way to continue to invest in the community despite massive reductions in central government funding.

- 7.13 In total, the council aims to build 3,050 new homes, including 1,100 council homes, 300 genuinely affordable homes to rent, investing in 48 schools and children's centres, providing 9,000m² of improved community facilities and the equivalent of 35 tennis courts. CIP will also help renovate thousands of existing council homes, as part of the Council's Better Homes Programme.

8 Appendix 3: Equalities and regeneration policy consideration local, regional and national

- 8.1 This appendix sets out the core policy position for this Equality Impact Assessment and strategic policies and planning documents that would impact on the development of the Camden Road Hostel site.

Camden's equality objectives:

- 8.2 Camden is one of the most diverse places in the country and communities of people with different identities, pride, cultures and abilities that are part of the neighbourhoods in London.
- 8.3 Reducing inequality while preserving the diverse culture is part of our goals for Camden to reflect community cultural pride, distinctiveness and disability as part of the Camden Plan. The aim is to build resilience within communities of individuals and the council itself.

Camden's equality policy

- 8.4 Camden has an ambitious agenda to address the needs of people who are faced with disadvantage or inequalities e.g. treated less favourably because of race, sex, disability, age, gender, reassignment, marriage and civil partnership, pregnancy and maternity / paternity, sexual orientation, transgender, religion / belief. We are committed to making sure that:
- Our services give satisfaction to all
 - Our policies and methods don't have any unintended adverse impacts
 - Our workforce is representative at all levels

Equality information and objectives

- 8.5 The borough developed its equality objectives alongside those in the Camden Plan. The borough also publishes a wide range of information illustrating the approach to meeting the requirements of the Public Sector Equality Duty and tackling inequality.

Equality taskforce

- 8.6 To help the council achieve its aims they have set up an equality taskforce aimed at exploring our role in challenging inequality in Camden. The taskforce explored how local public services can help tackle inequality in the borough, taking a fresh look at what influences inequality locally and exploring how it can best be tackled.

London Borough of Camden Strategic Housing Market Assessment Household Survey Results May 2017

Demography and Tenure

- 8.7 The Census 2011 showed a total population of 220,338 in Camden, of which: 49% were male, 51% female; 16.1% were aged under 16, 68.8% aged between 16 and 59, and 15.1% aged 60 or over 47.3% were White British, Irish, or Gypsy/Traveller, 52.8% BAME or White Other. (Source: Census 2011)
- 8.8 The Census showed 97,534 households in Camden, of which: 32.9% were owner occupied; 34.0% were private rent; 33.1% were social rent. (Source: Census 2011)

Market Signals

- 8.9 The Strategic Housing Market Assessment (SHMA) survey has considered the Market Signals for Camden and compared these to other areas which have similar demographic and economic characteristics (Hammersmith & Fulham, Kensington & Chelsea, Tower Hamlets and Wandsworth), as suggested in the Planning Practice Guidance. These Market Signals provide a context to the survey results by summarising housing costs and affordability, overcrowding and delivery:
- 8.10 House Prices: lower quartile prices are higher than the national average, with a lower quartile price of £351,600, compared to England's £126,200 (based on 2012-13 values). The current price in Camden is similar to Hammersmith and Fulham, but higher than Tower Hamlets and Wandsworth.
- 8.11 Rents: for average private sector rents in 2014-15, Camden is above the national average. The rents are also higher when compared with three of the four comparator areas, with only Kensington and Chelsea being more expensive.
- 8.12 Affordability: (in terms of the ratio between lower quartile house prices and lower quartile earnings) is currently 'worse' in Camden than across England as a whole (13.6x cf. 6.5x) but is similar to Hammersmith and Fulham and Wandsworth. However, it is significantly higher than Tower Hamlets.
- 8.13 Rate of development: (in terms of increase in dwelling stock over the last 10 years) shows that development has increased the stock size by 7.2%, which is lower than England (8.3%). This rate for Camden is much higher than Kensington and Chelsea, but much lower than Tower Hamlets. Of course, these figures will inevitably be influenced by local constraints as well as individual policies.
- 8.14 Overcrowding: (in terms of Census occupancy rates) shows that 32.5% of households in the study area are overcrowded based on an objective measure, which is much higher than England (8.7%). However, Tower Hamlets has a higher rate of overcrowding while other comparators are slightly lower. Also, the proportion of overcrowded households has increased over the last 10 years at a lower rate to the national average (9% cf. 23%).

Homelessness and Rough Sleeping Strategy 2019-2024

- 8.15 There are four key priorities set out in the strategy:
1. Preventing: to stop people from becoming homeless.
 2. Supporting: to support those experiencing the crisis of homelessness, helping them to recover and regain their independence.
 3. Tackling the root causes of homelessness: to address the long-term root causes of homelessness in Camden.
 4. Campaigning: to fight for a national response to the challenges of chronic housing shortage, instability and homelessness.
- 8.16 Section 3 of the strategy looks at Priority 2-Supporting in more detail under the section on accessing the right accommodation providing the commitment to redevelop two Camden owned hostel sites in the borough with larger accessible studio/one bedroom units better suited to families' needs.
- 8.17 Section 3.2 provides both evidence and actions as to how Camden is addressing the issues of accessing the right accommodation. Due to the housing shortage, Camden has a number of initiatives including use of the private rented sector in and out of the borough, tenancy sustainment support, addressing the issue of people who have been living in temporary accommodation (29% are long stayers who have been in temporary accommodation for more than five years). The London School of Economics were commissioned to research the experience of families living in temporary accommodation which uncovered concern about placements out of borough and the impact on their children's health growing up within a confined space. There was a strong preference for temporary housing options to be in Camden with access to local schools and family networks.
- 8.18 It states that the Council's current portfolio of temporary accommodation for homeless families has an oversupply of small units resulting in a high rate of unoccupied rooms and spot purchasing of expensive nightly paid annex units outside of the borough. The strategy states that it will create temporary accommodation in the borough so that it better meets the needs of homeless families. The proposal to redevelop two of the Council's existing hostel sites has been approved by the Cabinet as part of the Medium Term Financial Strategy providing 90 studio/one bedroom units which include wheelchair accessible units and will be better suited to families' needs as they will be larger than existing provision.
- 8.19 The strategy recognises that homelessness cannot always be prevented. Consistent with a wider approach to delivering care to all residents as outlined in the adult care strategy 'Supporting People, Connected Communities', the Council remains committed to enable all homeless residents to access the care that they need, to be

independent, to have more choice and control and be central to any decisions being made about their care.

Camden Homeless Young Peoples Protocol

- 8.20 Children's Safeguarding and Social Work and Homeless Services have agreed a joint protocol for 16 and 17 year olds presenting as homeless or at risk of homelessness. The protocol states that where accommodation is provided it will be suitable for the young person's assessed needs and the use of bed and breakfast accommodation will be avoided. Risk assessments will inform placement decisions in order to safeguard young people within the Young Person's Pathway.
- 8.21 A further section refers to the young person's consent to accommodation ensuring their views, wishes and feelings are sought and that the steps taken to inform young people are recorded on the case record. Young People's Pathway is a specialist housing service designed to provide the most suitable level of support based on their needs as they move towards independence. Young people with specific needs or circumstances, for example young parents, for example mother and baby units.
- 8.22 Appendix 1 of the protocol looks at various dimensions of need and the first issue listed in consideration is accommodation. Does the child have access to stable accommodation and how far is this suitable to the full range of the child's needs.

Camden Homelessness Accommodation Policy and Placement Policy

- 8.23 The Homelessness Accommodation Strategy, with the accompanying Placement Policy covers the allocation of temporary accommodation, accommodation to prevent homelessness and discharge of duty. It covers the allocation of social housing tenancies and priorities for private sector accommodation.
- 8.24 The policy further sets out the approach to bedroom need and stating that the following household members are expected to share a bedroom:
- Adult couples
 - 2 children aged under 16 of the same sex
 - 2 children under ten regardless of sex
- 8.25 The following household members are entitled to their own room:
- A single adult (aged 16 and over)
 - A child that would normally share but shared bedrooms are already taken, for example if the household has three children and 2 already share
 - Children who cannot share due to a disability or medical condition
- 8.26 The decision about which household to make an offer of private accommodation to, as discharge of S193 homelessness duty, will consider a range of circumstances, which will depend on the individual circumstances of the applicant including:
- The cost of existing accommodation to the council

- The suitability of the applicant's current temporary accommodation, including affordability
 - The likely availability of alternative social housing
 - Time in temporary accommodation (with those who have been longer in TA taking priority)
- 8.27 Temporary accommodation is usually allocated on the day that the family will need it. Where a Camden hostel is not suitable due to household size or medical circumstances or a hostel would be suitable but is not available, annex accommodation will be procured.
- 8.28 This policy accompanies the Homelessness and Rough Sleeping Strategy and should be interpreted in the context of that strategy and the associated action plan. The Council provides accommodation to a range of housing needs and also commissions housing related support services for single homeless people with support needs that are delivered in hostels and supported housing.

Camden's Housing Allocation Scheme 2018

- 8.29 This sets out who can apply for social housing in the Borough (Council housing and housing association homes) and how social housing is used to help those most in need. The Scheme prioritises households at risk of homelessness who work with the authority to have their homelessness prevented. The Scheme also prioritises overcrowded households with children and those with a connection to Camden. The first two years of the Scheme had a considerable impact with a 35% reduction in the number of severely overcrowded households with children waiting for social housing (666 children in total).

National Policy

National Planning Policy Framework

- 8.30 The National Planning Policy Framework July 2018 ("NPPF") sets out the Government's planning policies for England and how these are expected to be applied. It is a material consideration in planning decisions. The NPPF confirms that the development plan continues to be the starting point for the determining the acceptability of development. There is a presumption in favour of sustainable development, which the NPPF identifies as having three overarching objectives, namely economic, social and environmental. The development of Camden Road Hostel will meet the economic, social and environmental objectives and the relevant policies are:
- In relation to economic objectives the NPPF supports the building of a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.
 - In relation to social objectives the NPPF supports strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can

be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being.

- 8.31 In terms of housing supply, Paragraph 59 states: "To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.
- 8.32 Paragraph 119 of the NPPF states that Local Planning Authorities should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development, using the full range of powers available to them. This should include identifying opportunities to facilitate land assembly, supported where necessary by compulsory purchase powers, where this can help to bring forward more land for meeting development needs and/or secure better development outcomes.

London-wide policy: London Plan

- 8.33 The London Plan was adopted with amendments in March 2016. The Plan includes strategic and planning policies to encourage equal life chances for all, in recognition of social inequalities existing within the city. A number of policies outlined in the Plan are relevant to the proposed regeneration, including tackling deprivation, promoting equality and enabling different groups to share in the benefits of development, specifically:

Policy 2.9

- Inner London Strategic planning requires that Boroughs and other stakeholders should work to realise the potential of London in ways that sustain and enhance its recent economic and demographic growth while also improving its distinct environment, neighbourhoods and public realm, supporting and sustaining existing and new communities, addressing its unique concentrations of deprivation, ensuring the availability of appropriate workspaces for the area's changing economy and improving quality of life and health for those living, working, studying or visiting there.

Policy 3.1

- 'Ensuring Equal Life Chances for All' requires that development proposals should protect and enhance facilities that meet the needs of particular groups and communities. The plan does not support proposals involving loss of these facilities without adequate justification or provision for replacement.

Policy 3.2

- 'Improving Health and Addressing Health Inequalities' is also relevant, requiring due regard to be had to the impact of development proposals on health inequalities in London.

Policies 3.17 - 3.19

- Concerning the provision of social infrastructure, including health and social care, education, sports and recreation facilities, are all relevant to equal opportunities.

Housing policies 3.3 - 3.16

- Concerning housing provision, affordable housing provision, mixed and balanced communities, housing choice and provision of associated play facilities, are all relevant to equal opportunities.

Policy 4.12

- Improving Opportunities for all requires that strategic development proposals should support local employment, skills development and training opportunities. The Plan notes continuing large inequalities in access to jobs and levels of worklessness, with Londoners from Black, Asian and Minority Ethnic (BAME) groups more than twice as likely to be unemployed as those from White groups.

Policy 7.1

- Lifetime Neighbourhoods policy for development which enables people to live healthy active lives, and maximises opportunity for community diversity and inclusion, and the design of places that meet the needs of the community at all stages of people's lives.

8.34 The London Plan suggests Major Centres should have Borough-wide catchment areas and are typically smaller than metropolitan centres. These centres may have developed sizeable catchment areas and normally have over 50,000 m² of retail floor space.

Equal Life Chances for All, the Mayor's equality strategy revised in June 2014²³

8.35 Equal Life Chances for All, the Mayor's equality strategy revised in June 2014 sets out priorities for achieving equality across a range of dimensions. It emphasises enabling the most vulnerable and disadvantaged people to benefit from London's success; supporting deprived communities, vulnerable people and promoting community cohesion; supporting businesses to consider social issues in their corporate planning to bring real change to people's quality of life; increasing the levels of employment of excluded groups; and decreasing the difference in income between the equality groups and others from deprived communities and the wider community.

²³ Mayor of London (Revised 2014) *Equal Life Chances for All* [online] available at:
https://www.london.gov.uk/sites/default/files/equal_life_chances_for_all.pdf

9 Appendix 4: Acknowledgements and thanks

Name	Organisation
Mark Hopson	Development Consultant LB Camden
Mark Vucic	Regeneration Team LB Camden
Sheena Anyanwu	Head of Homelessness Services
Andrew Moradeyo	Single Pathways Service Manager
Shaun Flook	Head of Housing Need
Minaxi Patel	Strategy and Commissioning Manager
Julie Newson	Housing Placements Service Manager
Simon Rathbone	Housing Needs Group Special Projects Manager
Ben Williams	Senior Data Engineer
Marcio Franco	Senior Applications Analyst