

Equality Impact Assessment Report

Abbey Road Phase 3

4 May 2022

Wates Residential

QUALITY ASSURANCE

Prepared and Edited By:

Signature



Celina Penny
Socio-Economic & Health Analyst
Sustainability, Impact Assessment & Social Vale
ESG Consultancy
For and on Behalf of CBRE Limited

Approved By:

Signature



Ceara Shields
Associate Director
Sustainability, Impact Assessment & Social Vale
ESG Consultancy
For and on Behalf of CBRE Limited

Date of Issue: 4 May 2022

File Name: Abbey Road
Phase 3 EqIA Report

Version: F2

Status: Final

Contents

1	Introduction	5
2	Site Description and Development Proposals.....	8
3	Appraisal of Potential Equality Impacts.....	11
4	Bibliography	19
	Appendix A – Policy & Legislative Context	21

Legal Notice and Disclaimer

This report (the “Report”) has been prepared by CBRE Ltd (“CBRE”) exclusively for Wates Residential appointed by the London Borough of Camden (Housing Department) (the “Client”) in accordance with the terms of engagement entered into between CBRE and the Client dated 31/03/2022 (“the Instruction”). The Report is confidential to the Client and the Client may not disclose the Report unless expressly permitted to do so under the Instruction.

If you are not the Client, then you are viewing this Report on a non-reliance basis and for informational purposes only. You may not rely on the Report for any purpose whatsoever and CBRE shall not be liable for any loss or damage you may suffer (whether direct, indirect or consequential) as a result of unauthorised use of or reliance on this Report. CBRE gives no undertaking to provide any additional information or correct any inaccuracies in the Report.

The contents of this Report must not be copied or reproduced in whole or in part by any party/person other than the Client without the written consent of CBRE.

None of the information in this Report constitutes advice as to the merits of entering into any form of transaction.

If you do not understand this legal notice, then it is recommended that you seek independent legal advice.

1 Introduction

Overview

- 1.1 This rapid Equality Impact Assessment (EqIA) has been prepared by CBRE Ltd, to accompany the full planning application for the redevelopment of Emminster and Hinstock blocks including Belsize Priory Health Centre, Abbey Community Centre, public house and commercial units otherwise known as Abbey Road Phase 3 (hereafter the 'Site'). submitted to the London Borough of Camden (LBC) on behalf of Wates Residential, appointed by the London Borough of Camden ('the Applicant'). This application seeks Full Planning Permission for the following works:

Demolition and redevelopment of Emminster and Hinstock blocks including Belsize Priory Health Centre, Abbey Community Centre, public house and commercial units to provide new residential accommodation (Use Class C3) and ground floor commercial space (Use Class E/Sui Generis) to be used as flexible commercial units, across three buildings ranging from 4 to 11 storeys, along with car and bicycle parking, landscaping and all necessary ancillary and enabling works.

- 1.2 The application site is located directly to the west of the junction of Abbey Road and Belsize Road, within Kilburn Ward of the LBC. It is triangular in shape and comprises the Belsize Priory Health and Community Centre and affordable housing units, which span across a five-storey block (Hinstock) and a seven-storey block (Emminster). The existing residential buildings comprise of 74 units, 55 1-beds and 19 studios, all of which were social rented units but are now predominantly vacant aside from occupation by property guardians. A number of tenants have already been re-housed within the neighbouring Phase 1 residential development or within other developments within the borough.
- 1.3 In addition to these uses at ground floor, there are nine small retail units (one of which is vacant) and a hot food takeaway, as well as a public house, the Lillie Langtry. The common areas on site are comprised of hardstanding and a limited number of trees, mainly along Abbey Road.
- 1.4 The site forms part of the wider Abbey Road Estate Regeneration Scheme. Outline consent was originally granted in 2012 (2012/0096/P) for the comprehensive redevelopment of the three sites within the Estate to deliver up to 296 residential units, a health and community centre as well as a range of ancillary uses including plant, landscaping and parking.
- 1.5 Following this, a hybrid permission (2013/4678/P) secured full planning consent for Phase 1 of the regeneration securing consent for 141 residential units, commercial floorspace, a retail unit and ancillary space including a basement car park. This detailed element of the consent was implemented in December 2014 following the grant of permission in May 2014. This hybrid permission also secured outline consent and was granted for the second and third phases. Phase 2 would deliver a health and community centre with Phase 3 delivering further residential units along with car parking and commercial floorspace. Matters such as dwelling mix, affordable housing provision and the decanting strategy around the existing Phase 3 building and residents into the Phase 1 part of the hybrid consent were considered holistically. The outline elements of this planning consent relating to Phases 2 and 3 have not been implemented. A Reserved Matters application was submitted for Phase 3 but was subsequently withdrawn.
- 1.6 A full planning permission for Phase 2 was granted in November 2020, which provides a high-quality health and community centre set within enhanced landscaping for the wider community. The Applicant is now seeking to bring forward the third phase of development to complete the regeneration at this important junction site. Whilst the applications have moved away from a single overall permission for the three phases, the actual delivery, linkages should have a holistic development approach.

Aims and Values

1 Introduction

- 1.7 The EqIA focuses on assessing and recording the likely positive and negative equality impact of the proposed development scheme for the affected people sharing protected characteristics identified in the Equality Act 2010.
- 1.8 The main objective of EqIA is to ensure relevant policies and programmes are implemented appropriately, in particular, with regard to their impact on the protected characteristics groups.

Means of Assessment

- 1.9 This EqIA has been undertaken in accordance with The Equality Act 2010.
- 1.10 The guidance supports the practical implementation of Camden's Local Plan (2017) which deals with inequality in Camden.
- 1.11 Professional expertise has been used to inform the identification of appropriate effects and assess the likely form and qualities of the proposed development with regard to potential impacts on equality. Any assumptions or uncertainties have been clearly highlighted.
- 1.12 The means of assessment for this EqIA included a desktop appraisal and document analysis. The desktop appraisal has involved establishing the current baseline condition, including the sensitivity and importance of those aspects likely to be significantly affected in equality terms by the proposed development.
- 1.13 For the elements under consideration within this EqIA, the baseline conditions have been established using a combination of published database, maps, technical reports and assessments.

Policy and Legislative Context

- 1.14 The following documents have been used to inform the assessment:
- The London Plan (2021) (1);
 - The Mayor's Strategy for Equality, Diversity and Inclusion (2018) (2);
 - Planning for Equality and Diversity in London Supplementary Planning Guidance (SPG) (3); and
 - Camden Local Plan (2017) (4).
- 1.15 The Equality Act 2010 places a legal duty on public authorities to take proactive measures to address inequality. It considers how the Council has fulfilled its duties, with reference to the Duty. Further details on equalities legislation is contained within Appendix 1.0.
- 1.16 The Equality Act 2010 forms the basis of anti-discrimination law within Great Britain. The Act replaces the Equal Pay act 1970, Sex Discrimination Act 1995, Race Relations Act 1976, Disabilities Discrimination Act 1995, Employment Equality (Religion or Belief) Regulations 2003, Employment Equality (Sexual Orientation) Regulations 2003 and Employment Equality (Age) Regulations 2006 in the aim of simplifying and codifying these Acts and Regulations. Section 149 of the Act requires public authorities to have due regard to equality considerations when exercising their functions.
- 1.17 The protected characteristics, as defined by the 2010 Act are:
- Age;
 - Disability;
 - Gender reassignment;
 - Marriage and civil partnership;
 - Pregnancy and maternity;

1 Introduction

- Race;
- Religion and belief;
- Sex; and
- Sexual orientation.

1.18 The main objective of EqIA has been to ensure public policies and programmes are implemented fairly, in particular with regard to their impact on the target groups identified above. This EqIA sets out information to assist Camden and the Secretary of State and Planning Inspector appointed by the Secretary of State in considering their public sector equality duty as set out in the Equality Act 2010. Section 149 of the Act requires public authorities to have due regard to a number of equality considerations when exercising their functions. The aim of this assessment is to assist the decisionmaker in this duty by presenting the relevant information relating to the project.

Identifying Impacts

- 1.19 In the context of a planning application many of the impacts are inherently challenging to define or quantify.
- 1.20 The physical characteristics of the buildings may impact certain protected characteristics through the design of the built environment. Other equalities impacts would depend on the future use of these building and the actions of the occupiers.
- 1.21 Nonetheless, there are certain aspects of the proposed development that may have impacts on particular equalities target groups e.g. impacts of design on accessibility for those with impaired sensory functions or mobility; and creation of employment opportunities which could benefit target groups.
- 1.22 While the scale and significance of these impacts cannot be specifically quantified, the direction of the impacts can be considered (whether they are positive, negative or neutral).

Supporting Information

- 1.23 The planning application is accompanied by a suite of documents including a Health Impact Assessment (HIA). The potential impacts of the scheme on local communities, human health and the local economy and business have been considered in full within this assessment.
- 1.24 The submitted Design and Access Statement (DAS) sets out the design features which have been considered as part of the applications to ensure the built environment and public realm created by the project adheres to current legislation and design codes. Therefore, these documents should be read alongside this EqIA.

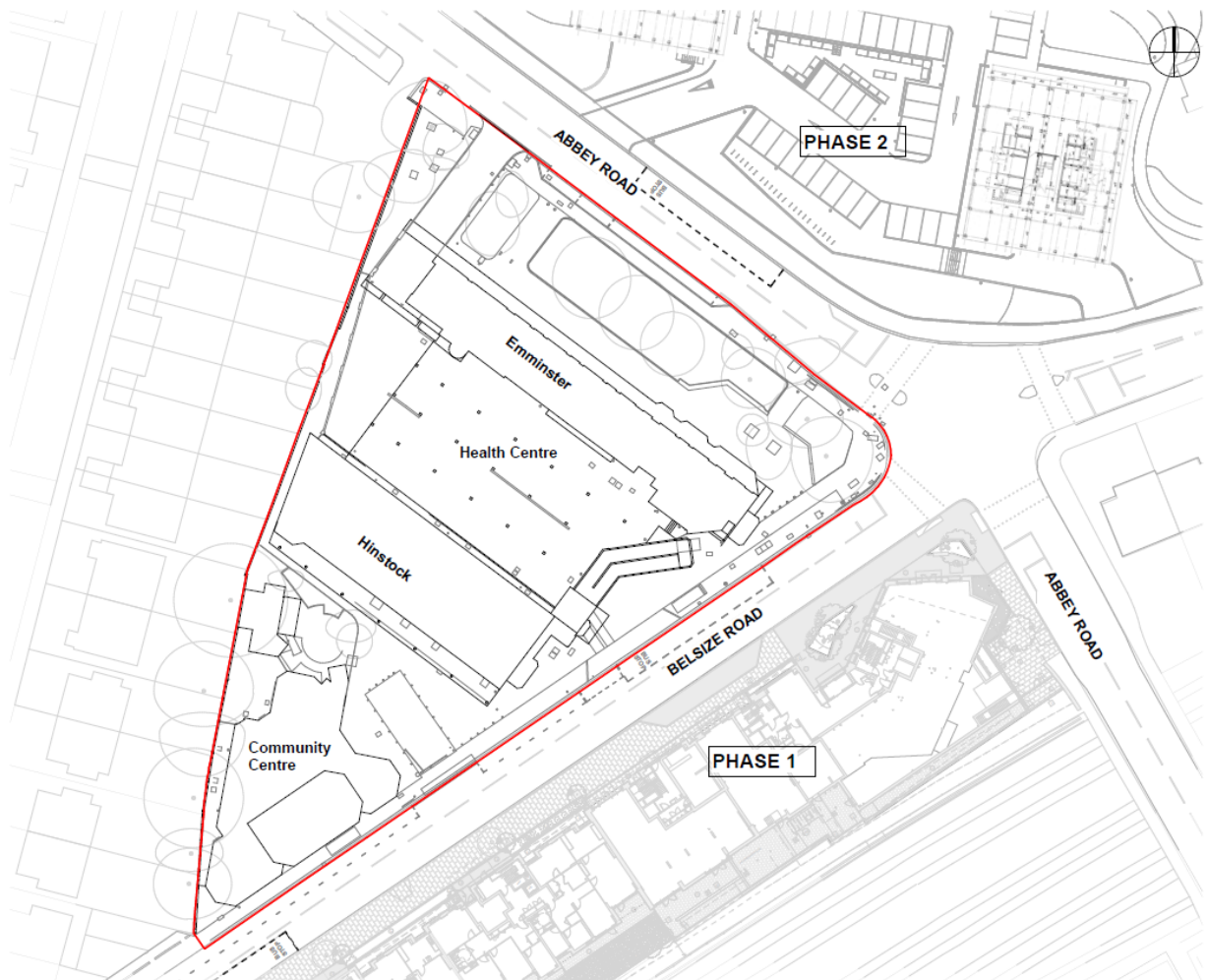
2 Site Description and Development Proposals

Site Description & Context

- 2.1 The proposed development is located the junction of Abbey Road and Belsize Road and forms part of an existing estate that has undergone renewal over a number of years. The site is triangular in plan with overall dimensions of about 75m by 110m. The location of the site is illustrated in Figure 1.

Figure 1

Site Location Plan (source: Pollard Thomas Edwards 2022)



- 2.2 To the north-east of the site is Snowman House and Casterbridge; two twenty-storey residential blocks, as well as the Belsize Open Space and a private car park for the existing residents. This area forms Phase 2 of the Abbey Estate and will, on completion of the development which commenced in early 2021, provide the re-located health and community centre currently found in Phase 3.
- 2.3 Directly adjacent to the open space in Phase 2 is the South Hampstead Conservation Area. To the east of the site, the area is predominantly comprised of two to four storey houses. To the south-east is Rowley Way (the Alexandra Road Estate) (Grade II Listed), which sits within the Alexandra Road Conservation Area. To the south is the recently completed Abbey Road Phase 1, comprising a 13-storey residential tower on the junction and six storey residential buildings along Belsize Road, with retail and commercial uses at ground floor.

2 Site Description and Development Proposals

- 2.4 The now complete Phase 1 of the Abbey Road masterplan replaced a multi-storey car park building with ancillary commercial uses at ground level. The north-west site boundary borders site the Priory Road Conservation Area and Priory Terrace, which comprises three to four storey houses. There are two listed buildings within this Conservation Area, to the north of the site; the Church of St Mary (Grade II Listed) and St Mary's Church Hall (Grade II Listed).
- 2.5 As previously mentioned, the site benefits from a PTAL rating of 6a (with the highest rating being 6b) and is considered to have a very good level of access to public transport. The closest train station is Kilburn High Road 445m south-west of the site and Kilburn Park on the Bakerloo line is the closest London Underground station 505m also to the south-west. The site is well served by bus services, with bus stop Belsize Road/Abbey Road served by routes 189, 31 and 139. Other surrounding bus routes are 328, 16, 32, 316, 332, 98 and 206.
- 2.6 The proposed Phase 3 residential-led development involves the demolition of the existing buildings and the erection of three buildings of six and nine storeys (Block A), seven and eleven storeys (Block B) and four and six storeys (Block C). The buildings will consist of 139 residential units and two commercial units at ground level of two of the blocks. A mix of 1, 2 and 3-bedroom homes across private, social and Camden Living tenure are proposed.
- 2.7 An area of at-grade open green space will be provided in a communal courtyard to be located in the centre of the site. A number of ground floor apartments may be provided with at-grade private gardens as part of the development. There will be 1,850 sqm of communal garden accommodating at least 675 sqm of playspace as well as cycle storage.
- 2.8 The design concept for Phase 3 takes inspiration from the semi-detached nature of the surrounding conservation areas, which provide breathing space around the buildings allowing for a green visual connection between the private garden and public street. Breathing spaces along Belsize Road and Abbey Road will provide a space for residents and locals to pause along these busy roads. Gaps between the proposed buildings will provide both visible and physical connections between the new public spaces to the street through to landscaped gardens beyond.
- 2.9 The retention of existing trees on site is a high priority in order to maintain established habitats and the benefits in which mature trees bring to urban environments physically and mentally.
- 2.10 The project has been reviewed and developed in accordance with the recommendations of a Designing Out Crime Officer (DOCO) and incorporating the guidelines of Secured by Design (SbD) Homes 2019.
- 2.11 Great homes for all, will maximise dual aspect for the benefit of natural cross ventilation. All of the homes will be provided with mechanical ventilation with heat recovery (MHVR), one of many energy saving measures which will reduce ongoing costs to residents. The proposals are a Fabric-first response to the climate emergency with commercial spaces achieving BREEAM Excellent. Heating and hot water will be generated through air source heat pumps (ASHPs), photovoltaics (PVs) on the roof, green roofs, water saving and sustainable urban drainage (SuDS) measures to promote resilience.

The Proposed Development

- 2.12 The scheme for the redevelopment of the site proposes the demolition of the existing residential buildings, community centre, health centre, public house and retail units on-site and the redevelopment of the site. The proposals comprise residential buildings ranging in height from four to eleven storeys in a perimeter block arrangement, with ancillary flexible space at ground floor and a communal garden which will include children's playspace. The development is proposed to be car-free, with the exception of wheelchair accessible parking which will be accommodated on or adjacent to the site.

2 Site Description and Development Proposals

- 2.13 The combination of history and regeneration within Camden has created a fascinating place to live, work and visit. The proposals will look to build on the positive transformation within Abbey Area redevelopment and around the junction, whilst also looking to the rich history of the surrounding context for inspiration.
- 2.14 These proposals are the final phase of the Abbey Area redevelopment and provides the opportunity to bring the qualities of the conservation areas to the junction of Belsize Road and Abbey Road.
- 2.15 It is important to note that whilst there are existing residential units on-site, residents have moved into the constructed Phase 1 or elsewhere within the borough. The residential units on-site are currently occupied by property guardians. There are a limited number of residents who have a 'Right to Return' and their housing needs are proposed to be addressed within the new development.
- 2.16 The following table shows the existing and proposed land uses:

Table 1

Characteristics of Development

	EXISTING	PROPOSED
Residential (Use Class C3)	74 units (all 1-beds)	139 units (a mixture of 1, 2 and 3 beds)
Commercial (Use Class E)	835 sqm Gross Internal Area (GIA)	305.3 sqm GIA of flexible Class E/Sui Generis floorspace (additional commercial already delivered in Phase 1)
Healthcare Centre and Community Centre	485 sqm	N/A

Nature of the Application

- 2.17 The Applicant has submitted an outline planning application comprising:
- “Demolition and redevelopment of Emminster and Hinstock blocks including Belsize Priory Health Centre, Abbey Community Centre, public house and commercial units to provide new residential accommodation (Use Class C3) and ground floor commercial space (Use Class E/Sui Generis) to be used as flexible commercial units, across three buildings ranging from 4 to 11 storeys, along with car and bicycle parking, landscaping and all necessary ancillary and enabling works.”*
- 2.18 The proposal would seek to deliver the following:
- Addressing Camden’s housing need, delivering 139 residential units which will meet the needs of the local community in terms of size and tenure;
 - Car-free scheme with the delivery of cycle parking in line with the London Plan (2021);
 - Open space and playspace provision for residents;
 - Active ground floor including commercial unit fronting onto the key junction of Abbey Road and Belsize Road;
 - High-quality affordable housing;
 - Excellence in architecture and design; and
 - Contribution to and final ‘phase’ of the wider Abbey Road Estate regeneration.

3 Appraisal of Potential Equality Impacts

Construction Phase

- 3.1 The construction period has the potential to lead to effects on amenity for local residents, employees or visitors e.g. noise, dust, poor air quality and disruptions to access routes. Some of these effects could disproportionately affect protected groups in the absence of appropriate mitigation, particularly older people and disabled people (including those with life-limiting illnesses).
- 3.2 The effects of construction will be managed and mitigated through mechanisms set out in a CEMP to be secured through an appropriately worded planning condition to be agreed with the LBC. A Draft Construction Management Plan has been prepared and submitted as part of this planning application, using the Camden template.
- 3.3 The CEMP would cover the following issues:
- details of hours of works;
 - dust mitigation measures including details of the specification, methodology and location for noise and dust monitoring and how data will be used to manage work on site to minimise impacts on surrounding neighbours;
 - the location and operation of plant and wheel washing facilities;
 - details of best practical measures to be employed to mitigate noise (including noise mitigation relating to on-site crushing) and vibration arising out of the construction process;
 - details of construction traffic movements including cumulative impacts which shall demonstrate the rationalisation of travel and traffic routes to and from the site; full details of the number and time of construction vehicle trips to the site with the intention and aim of reducing the impact of construction related activity; measures to deal with safe pedestrian movement;
 - construction logistics and appropriate measures to control the potential effects of the construction process on the wider road network and environment;
 - security management (to minimise risks to unauthorised personnel);
 - an Emergency Evacuation Plan for construction workers at the site, in the event of on-site flooding;
 - details of the training of site operatives to follow the CEMP requirements;
 - details of site hoarding to be erected around the perimeter; and
 - save for works that have first been agreed by the local planning authority in writing, no demolition or construction works shall be undertaken outside the following hours: · Monday to Friday - 08:00 to 18:00; Saturday - 08:00 to 13:00; and Sundays and Bank Holiday - No Work.
- 3.4 The site will be registered with Considerate Constructor's Scheme (CCS). The Applicant will register the project and adopt an independently assessed voluntary code of practice covering issues such as environmental awareness, relations with the public, site welfare and safety of those on-site and off-site.

3 Appraisal of Potential Equality Impacts

- 3.5 Any effects on amenity will be temporary. These effects will be monitored and minimised or mitigated throughout the construction period, including those issues which may disproportionately affect protected groups. A summary of this assessment is presented below.

Construction Phase	
Potential effects on Protected Groups or Protected Characteristics	Temporary effects of construction in particular - amenity, noise pollution, air quality and access routes – that may affect older people, children, pregnant women and disabled people (including those with life-limiting illnesses) if not managed or mitigated adequately.
Scheme Assessment	<p>Potential effects will be monitored and minimised or mitigated throughout the construction period. Stringent monitoring and management are secured as a Planning Condition and through the CEMP including:</p> <ul style="list-style-type: none"> ▪ Dust & air quality; ▪ Noise; ▪ Hours of operation; ▪ Traffic and transport; ▪ Hoarding; and ▪ Site safety.

Operational Phase

Delivery of new housing

- 3.6 Access to affordable, good quality housing is essential for building sustainable communities, reducing pressure on housing waiting lists and offering more opportunities for vulnerable groups (e.g. older people, younger people, low-income households) to improve their standard of living.
- 3.7 The Marmot Review into Health Inequalities (2010) identified that bad housing conditions – which also includes factors such as homelessness, temporary accommodation, overcrowding, tenure insecurity and housing in poor physical condition – constitute a risk to health, and this is most likely to affect the more vulnerable groups in society. Delivering affordable, well-designed housing is a key element in reducing health inequalities, particularly for vulnerable groups.
- 3.8 In order to deliver homes that are appropriate for the needs of these groups, the DAS sets out how the Applicant and their design team considered the requirements of all users including:
- People with mobility impairments;
 - People with visual impairments;
 - Deaf people;
 - Older people; and
 - Small children.
- 3.9 The proposals are reviewed against the relevant regulations and standards that apply, as identified in the DAS.
- 3.10 The proposals demonstrate that a good level of inclusive design will be achieved in the scheme by compliance with the requirements of:
- Wheelchair Housing Design Guidelines/Lifetimes Homes/Building Regulations Part M;
 - British Standards where applicable; and
 - Local, London and national planning policies as applicable.

3 Appraisal of Potential Equality Impacts

- 3.11 At least 10% of all units provided across all tenures will be Wheelchair Housing Units meeting the relevant requirements.
- 3.12 Overall, the design standards will anticipate the needs of current and future residents and visitors. This will have an overall positive effect on the lives of these people and households, including those with protected characteristics.
- 3.13 Affordable rented units will be allocated subject to the legal protections in equalities applied by the LBC or commissioned housing management company under the Housing Act and Camden's Housing Allocation Scheme Policy. In accordance with Camden's Housing Allocations Policy, new affordable housing can be prioritised for people and families with priority needs such as those at risk of violence or serious ill-health, those in very overcrowded homes older people and single parents and families with children.
- 3.14 Whilst not discriminating in favour of any particular group, the allocation of affordable rented housing to reflect need would be expected to offer significant benefits to those who suffer disproportionately from housing need and would be expected to have a beneficial effect on alleviating the housing problems faced by some residents in protected groups.

Operational Phase: Delivery of New Housing

Potential effects on Protected Groups or Protected Characteristics	Improved housing provision may affect those who suffer disproportionately from housing need including children, young people, older people, people from ethnic minority backgrounds, disabled people, and women.
Scheme Assessment	<p>The scheme will provide improved housing, with respect to appropriateness, accessibility and affordability. In order to further enhance measures:</p> <ul style="list-style-type: none"> ▪ ensure final housing mix that is delivered meets the needs of current and future residents (e.g. ensuring at least 10% of homes are accessible); and ▪ where possible, provide new housing that exceeds current minimum building standards e.g. Decent Homes Standard

Creation of employment opportunities

- 3.15 In the Operational Stage the new floorspace will generate employment on-site – it is estimated that 14 Full Time Equivalent (FTE) jobs and 3 part time workers would be supported by the new commercial floorspace (a net decrease of approximately 40 to 45 commercial jobs on-site).
- 3.16 However, the report on commercial floor space in the proposed redevelopment of the estate phase 3 demonstrates that the provision of retail floorspace at the existing site is not economically viable due to a lack of demand. The conclusion from this report indicates that the retail floorspace onsite should not exceed the quantum at the proposed development. The council have agreed their preference to replace the existing provision with smaller units to best suit the needs of the local market and resident population.
- 3.17 Delivery of this new floorspace would support demolition and construction employment. At peak, up to 65 FTE jobs (Camden residents) including 20 work experience placements, 14 new apprentices and 18 new jobs could be supported – although not all of these jobs would be on-site. Typically, on-site employment is considered to be around half of the total employment but this depends on construction methods and materials.
- 3.18 The jobs created could provide specific opportunities for:
 - Young people under 25;

3 Appraisal of Potential Equality Impacts

- People who want part time jobs to work around family care or study, particularly women; and
 - People with entry level skills and experience and those coming back to work from unemployment.
- 3.19 Some protected groups may be unevenly represented in terms of barriers to accessing work, skills and qualifications. These barriers include language, cultural factors, family requirements and the need for flexible and/or part-time work. Young people, older people, family carers and ethnic minorities have disproportionate challenges accessing employment.
- 3.20 The opportunities that will be created by the Scheme could align with the employment needs of local residents including those in protected groups.
- 3.21 As set out above, during the Construction Stage Wates aim to create a significant number of full-time equivalent roles, including apprenticeships, for Camden residents.
- 3.22 The amount of operational employment opportunities at the proposed development are relatively modest. As such a detailed employment and skills plan for the operational phase is not proposed. That said, the applicant is committed to working with end users to ensure they align with Wates and the applicant's social value commitments wherever possible, building on the construction commitments. This will include:
 - working with the council on ways in which the commercial space can address local needs for employment and training
 - there will not be targets to employ local staff members but they will actively encourage local jobs through publicising locally
 - responsible recruitment practices
 - equality, diversity and inclusion in recruitment and employment policy
- 3.23 The recruitment for new jobs created during either construction or in the completed development would be required to be based on a non-discriminatory basis in accordance with legal requirements of Part 2 and Part 5 of the Equality Act 2010. This includes the legal obligation not to discriminate on the basis of age, disability, gender reassignment, pregnancy and maternity, race, religious belief, sex or sexual orientation.
- 3.24 As such, the proposals offer the opportunity to provide significant benefits to protected groups through the creation of jobs that meet a range of skill profiles and flexibility needs. These benefits will be enhanced through committed brokerage schemes tailored to support local people into employment.

Operational Phase: Creation of Employment Opportunities

Potential effects on Protected Groups or Protected Characteristics

New employment opportunities may affect older people, disabled people, people from ethnic minority backgrounds, young people and women through the creation of jobs that meet a range of skills and flexibility needs.

Scheme Assessment

The scheme will provide new retail space and opportunities for employment through construction jobs, meanwhile use spaces and apprenticeships secured via social value commitments. Beyond improving outcomes for existing businesses, there are also opportunities to improve equality of outcomes by:

- working with owners of new businesses in the renewal area to employ local people, focusing on groups that are vulnerable to unemployment e.g. people from ethnic minority backgrounds, disabled people, young people.

3 Appraisal of Potential Equality Impacts

Community, health and wellbeing

- 3.25 One priority for planning community facilities is to ensure essential neighbourhood services can be accessed by all new residents. This may be especially important for hard-to-reach groups and those who may be less able to engage with local services. This may include groups with protected characteristics especially children, older people and disabled or people with life-limiting illnesses.
- 3.26 Provision of and access to good quality public services, including recreation facilities and neighbourhood retail can help to support the health and wellbeing of the local residents. It can also promote an active street life and foster a sense of community. This can help to tackle existing inequalities and make it easier to live a healthy lifestyle, especially for those for whom accessing these facilities can be challenging.
- 3.27 New residents on-site will need good access to new neighbourhood facilities as well as to wider strategic infrastructure. The creation of additional homes and therefore occupation of the site by families with young children will create an impact on education and childcare capacity locally.
- 3.28 Based on the nature of the businesses on-site, there is no reason to believe that there will be a differential or disproportionate effect on people with protected characteristics with respect to service users (customers or clientele) of these businesses.
- 3.29 The scheme will include 300 – 350 sqm GIA of commercial floorspace that could provide community floorspace or neighbourhood retail.
- 3.30 The proposal would result in the loss of existing community floorspace including a health care centre. Although the proposed new development does not include new community facilities, such facilities have been provided within Phase 2 of the estate renewal which is due to be completed in the near future (July 2022). As the proposal will not result in the loss of community facilities which would be fully reprovided as part of the consented development, Greater London Authority (GLA) officers are of the view that the proposal is in line with the requirements of Policy S1 of the London Plan.
- 3.31 In addition, the Applicant will contribute an estimated £2,345,003 million in Community Infrastructure Levy (CIL) contributions. Within Camden, this will provide for education, health and other local community facilities, wider transport initiatives, open space and allotments, flood management or emergency services according to Lewisham's priorities.
- 3.32 Through agreed on-site provision and through financial contributions, any potential negative effects with respect to access to community facilities would be mitigated. Additionally, by creating affordable housing, on-site neighbourhood facilities and open space and playable space in a safe, accessible environment, the scheme could help to support the needs of new residents including those with protected characteristics.

Operational Phase: Community, Health and Wellbeing

Potential effects on Protected Groups or Protected Characteristics	Provision of community resources and improved social cohesion in particular – affordable housing, on-site neighbourhood facilities and open space- may affect children, older people, disabled people, people from ethnic minority backgrounds, pregnant women, and LGBTQ+ people.
Scheme Assessment	<p>The scheme will not result in the loss of community facilities, as the existing health care centre has been reprovided in Phase 2 of the estate renewal. In order to further enhance measures:</p> <ul style="list-style-type: none"> continue to involve the local community in decisions about which resources should be incorporated into the area, specifically targeting

3 Appraisal of Potential Equality Impacts

- protected characteristic groups that are likely to benefit from improvements; and
- monitor effects of increased population on community resources (such as schools and health care) and ensure these are mitigated.

Design and public space

- 3.33 The scheme has been designed in line with Lifetime Neighbourhood principles. These aim to create sustainable communities by designing places that are accessible, inclusive and safe. Good design responds to current needs as well as allowing for potential demographic changes such as a future increase in older people. Further detail about the design and accessibility of the scheme is set out in the DAS.
- 3.34 The scheme will increase the amount of accessible space in the local area, including accessible employment space, shops, open spaces and public realm. This will help all residents, employees and visitors to feel safe and to travel independently. This will be especially helpful for those with protected characteristics such as disability and for older people.

Operational Phase: Design and Public Space

Potential effects on Protected Groups or Protected Characteristics	Safety and security, improved access, mobility and navigation, and improved public realm and open space may affect young people, older people, people from ethnic minority backgrounds, disabled people, LGBTQ+ people, children, men and women.
Scheme Assessment	<p>The scheme will improve connectivity and accessibility across the Estate. To enhance this, it is recommended to:</p> <ul style="list-style-type: none"> ensure the design of movement networks specifically addresses the mobility and user needs of different groups. This can be achieved by applying principles of inclusive design; and apply design that creates a safer environment for all transport users by managing potential conflicts between modes. <p>The scheme will provide an opportunity to incorporate new security measures. This can be enhanced by:</p> <ul style="list-style-type: none"> following Crime Prevention Through Environmental Design (CPTED) and Secure by Design principles in designing the built environment and public realm; applying recommendations for safety and security in design where relevant (e.g. CCTV, lighting, active frontages that generate passive surveillance, design that avoids vandalism). <p>The scheme will provide additional open space and new play space. In order to further enhance measures:</p> <ul style="list-style-type: none"> enable ongoing involvement of the local community in planning and designing improvements to the public realm and open spaces, specifically targeting protected characteristic groups that are likely to benefit from improvements e.g. children, older people and disabled people; and ensure that inclusive design principles are followed in the design of public spaces.

Transparency and public engagement

- 3.35 The Statement of Community Involvement sets out the full details of the consultation and engagement process that was commenced in 2012 and has continued through 2021 and 2022.
- 3.36 Forms of consultation included newsletters, posters, flyers, a website, online community and local public events. This consultation took account of views from a wide range of community groups and interested parties. A full list of consultees is set out in the Statement of Community Involvement.

3 Appraisal of Potential Equality Impacts

- 3.37 Over the course of the consultation process, the project team have listened to and responded to the views of local residents and organisations alongside those of statutory consultees such as the GLA, LBC and Transport for London (TfL).

Operational Phase: Transparency and Public Engagement

Potential effects on Protected Groups or Protected Characteristics	Information and communication may affect older people, disabled people, and people from ethnic minority backgrounds. Some groups of individuals may find communication more challenging than others and this is likely to depend upon the exact method and format of communication.
Scheme Assessment	<p>The scheme has upheld a process of two-way communication between residents and the council and or housing authorities for residents to understand the options available to them. To manage any residual effects, it is recommended that the Council:</p> <ul style="list-style-type: none"> ▪ monitor the reach and impact of online engagement (in particular, for the duration of the Covid-19 crisis) to ensure older people, disabled people and people from ethnic minority backgrounds continue to be reached and can provide input to the redevelopment process; ▪ continue to advise residents on ways they can meaningfully engage in decision making and understand options available to them; ▪ continue to provide services such as language interpretation and face to face engagement; and ▪ continue to publish information and seek feedback through a variety of mediums and different formats.

Conclusion

- 3.38 The scheme has been planned and designed to provide an inclusive environment. Overall, it has been assessed that the scheme would not have a negative impact on protected groups or characteristics. The delivery of homes, employment space, public realm and neighbourhood facilities will have beneficial effects on the local community of existing and new residents, employees and visitors, including those with protected characteristics.
- 3.39 The table below summarises the potential impacts affecting each protected characteristic as defined by the Equality Act 2010.

Table 2

Summary of Equalities Impact

Potential Impact	Protected Characteristic Affected	Reason
Temporary effects of construction	Pregnancy & maternity, Disability, Age	Temporary effects of construction in particular - amenity, noise pollution, air quality and access routes – that may affect older people, children, pregnant women and disabled people (including those with life-limiting illnesses) if not managed or mitigated adequately.
Improved housing provision	Sex, Race, Disability, Age	Improved housing provision may affect those who suffer disproportionately from housing need including children, young people, older people, people from ethnic minority backgrounds, disabled people, and women.
New employment opportunities	Sex, Race, Disability, Age	New employment opportunities may affect older people, disabled people, people from ethnic minority backgrounds, young people and women through the creation of jobs that meet a range of skills and flexibility needs.

3 Appraisal of Potential Equality Impacts

Potential Impact	Protected Characteristic Affected	Reason
Provision of community resources and improved social cohesion	Sexual orientation, Race, Pregnancy & maternity, Disability, Age	Provision of community resources and improved social cohesion in particular – affordable housing, on-site neighbourhood facilities and open space- may affect children, older people, disabled people, people from ethnic minority backgrounds, pregnant women, and LGBTQ+ people.
Safety and security	Sexual orientation, Sex, Race, Disability, Age	The scheme will provide an opportunity to incorporate new security measures which may affect young people, older people, people from ethnic minority backgrounds, disabled people, LGBTQ+ people, children, men and women.
Improved access, mobility and navigation	Sexual orientation, Sex, Race, Disability, Age	The scheme will improve connectivity and accessibility across the Estate which may affect young people, older people, people from ethnic minority backgrounds, disabled people, LGBTQ+ people, children, men and women.
Improved public realm and open space	Sexual orientation, Sex, Race, Disability, Age	The scheme will provide additional open space and new play space which may affect young people, older people, people from ethnic minority backgrounds, disabled people, LGBTQ+ people, children, men and women.
Information and communication	Race, Disability, Age	Information and communication may affect older people, disabled people, and people from ethnic minority backgrounds. Some groups of individuals may find communication more challenging than others and this is likely to depend upon the exact method and format of communication.

4 Bibliography

1. **Mayor of London.** *London Plan*. London : GLA, 2021.
2. **Greater London Authority.** *The Mayor's Equality, Diversity and Inclusion Strategy*. London : s.n., May 2018.
3. **Mayor of London.** *Planning for Equality and Diversity in London SPG*. London : s.n., October 2007.
4. **London Borough of Camden.** *Camden Local Plan*. London : s.n., 2017.

Appendices

Appendix A – Policy & Legislative Context

Equality Act (2010)

The Equality Act 2010 is the relevant legislation setting out the Public Sector Equality Duty, to which Camden Council is subject in carrying out all its functions, including its consideration of planning applications.

In December 2013, the Government announced that Network Rail has been classified as a central government body in the public sector and the public sector Equality Duty therefore also applies. The new classification will be implemented from 1st September 2014.

Those subject to the Duty must, in the exercise of their functions, have due regard to the need to:

- eliminate discrimination, harassment and victimisation and other conduct prohibited by the Act;
- advance equality of opportunity between people who share a protected characteristic and those who do not; and
- foster good relations between people who share a protected characteristic and those who do not.

These are sometimes referred to as the three aims or arms of the general equality Duty. The Act explains that having due regard for advancing equality involves:

- removing or minimising disadvantages suffered by people due to their protected characteristics;
- taking steps to meet the needs of people from protected groups where these are different from the needs of other people; and
- encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low.

The Act states that meeting different needs involves taking steps to take account of disabled people's disabilities. It describes fostering good relations between people who share particular protected characteristics and those that don't, involving the need to tackle prejudice and promote understanding. The Duty covers the following eight protected characteristics: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation. Public authorities also need to have due regard to the need to eliminate unlawful discrimination against someone because of their marriage or civil partnership status. This means that the first arm of the Duty applies to this characteristic, but that the other arms (advancing equality and fostering good relations) do not apply.