

Equalities Impact Assessment

Camden Council

What is an Equality Impact Assessment?

An Equality Impact Assessment (“EIA”) is a way of analysing a proposed organisational policy or decision to assess its effect on people with protected characteristics covered by the Equality Act 2010*. To meet the Council’s statutory duty the EIA should also address issues of advancing opportunities and fostering good relations between different groups in the community.

The Council has a strong tradition of ensuring equality both in terms of service delivery and within its workforce. To help us maintain this tradition it is essential that you start to think about the EIA process before you develop any new activity or make changes to an existing activity. This is because the EIA needs to be integral to service improvement rather than an ‘add-on’. If equality analysis is done at the end of a process it will often be too late for changes to be made.

The courts place significant weight on the existence of some form of documentary evidence of compliance with the Public Sector Equality Duty* when determining judicial review cases. Having an EIA as part of the report which goes to the decision makers and making reference to the EIA within that report helps to demonstrate that we have considered our public sector equality duty and given “due regard” to the effects the decision will have on different groups.

The EIA must be considered at an early stage of the formation of a policy/decision and inform its development, rather than being added on at the end of the process. The EIA form should be completed and updated as the policy / decision progresses and reviewed after the policy or change has been implemented.

If a staff restructure of organisational change is identified as necessary following the review of an activity then an EIA needs to be completed for both stages of the process, i.e. one when the activity is reviewed and one when the restructure or organisational change is undertaken.

Please note all sections must be completed. However the obligation is to have due regard and it may be that while an issue requires the completion of an EIA, the matters at hand may not lend themselves to some of the obligations, for example fostering good relations. As long as this has been properly considered it is legitimate to conclude that this cannot be applied in a particular case.

*Please read the notes at the end of this document.

Name of proposed decision/policy being reviewed:

The first draft of the Euston Area Plan Update which is due to be published for consultation and engagement(subject to a Cabinet decision). The consultation will focus on the draft document and is proposed to run for six weeks from January 2023.

DRAFT

Question 1

What is changing and why?

If the issue is going for decision, e.g. at Cabinet meeting, what are the decision makers being asked to decide? If you are reviewing a policy what are its main aims? How will these changes affect people?

What is changing and why?

Euston is changing, construction for HS2 is underway, and Network Rail and Transport for London are also thinking about their future plans. A fully redeveloped, comprehensively designed Euston station would create a once in a lifetime opportunity to provide a new piece of city, delivering new homes, creating new jobs and open space and new routes through and around the station.

In planning for the future, Camden Council working with TfL and the GLA produced and adopted the Euston Area Plan (EAP), a long-term strategic planning framework to guide transformational change in the area up until 2031. Proposals for development at Euston will be assessed against the existing Development Plan, which is comprised of a series of documents that include the London Plan, the Camden Local Plan, and the Euston Area Plan (EAP) adopted in 2015.

More information about the development plan, neighbourhood planning and supplementary planning documents can be found on the Council's website at www.camden.gov.uk/planningpolicy and info on London Plan can be found at <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/london-plan-2021z>.

The EAP area covers approximately 85 hectares and includes Euston Station, areas east to west Somers Town, areas west to and including Regent's Park Estate, areas north to Mornington Crescent and south to northernmost Bloomsbury. The plan includes strategic policies concerning land use, design, transport and environment and open space, as well as geographically targeted place principles.

It is a legal requirement for all local plans to be reviewed at least every five years (Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012). As well as this requirement, various other key factors have changed since the EAP was adopted in 2015 which have also triggered an update to the Euston Area Plan. These include Camden adopting the Camden Local Plan in 2017, the High Speed Rail (London – West Midlands) Act 2017 being passed ("the HS2 Act") authorising construction of the first phase of HS2, Lendlease being appointed as Master Development Partner, and emerging plans for Euston Station by Network Rail. The background information for the EAP and the capacities identified were based on the station design constraints and information from 2013. This is now over nine years out of date and designs have evolved and areas, and in some cases constraints, funding, deliverability and requirements, have changed.

In this time, wider Council priorities and context has also changed and evolved, including the declaration of a Climate Emergency in 2019 by the Council. The EAP is therefore being updated to ensure that the evidence base for key parts of the plan are revised to reflect the most up to date information, constraints, opportunities and priorities.

The Government's current proposals for Euston Station, include building a new HS2 station alongside the existing Euston Station. Network Rail are currently considering plans for a redeveloped station and are preparing a business case for the first phase, including how it can integrate with the HS2 station and London Underground upgrades. Proposed updates to the EAP will look at how to make the most of the station designs, to try to ensure that the designs for the station and associated development responds to EAP objectives as much as possible.

More generally, as detailed design has developed, this has led to more certainty about what can be built, funded and enabled and the timescales involved. This evolving information and the need to reflect evolving priorities including in relation to climate change and delivering social value, are all reflected in the proposed updates to the EAP. It is proposed that the Plan will cover the period to 2047.

What are its main aims?

The EAP is a high level document expressed in terms of guidance on future decision-making and aspirations for future expenditure. It aims to improve the area for all of Euston's residents, workers and visitors (current and future).

The EAP update refreshes the target for the delivery of housing, reflecting constraints and reduced availability of land (taking into account the areas over the station, and tracks which we have been advised it may be possible to build on and those which are likely to be funded), the proposed update to the Plan identifies capacity for:

- 1,500 to 2,800 new homes (2015 EAP: 2,800 – 3,800)
- 7,500 to 13,700 jobs (2015 EAP: 7,700 – 14,100); and includes
- 20,000sqm of retail – quantum remains the same as 2015 EAP and seeks a retail strategy for masterplan area and retains requirement for retail impact assessment for floorspace above this figure.
- Greater focus on knowledge economy uses, which will be given overall priority for new and additional employment floorspace over 1,000sqm.

Proposed updates to the Plan highlight more explicitly the need to ensure that new development contributes to reducing inequalities and increasing life chances in local residential communities, creating opportunities for all and ensuring that investment delivers benefits where they are most needed, maximising social value and addressing concerns around safety and security. This recognises the identified inequalities in the local area; what we have been told through consultation about the perceived lack of local benefits associated with recent major developments in the area and the ongoing impact of HS2 works on local communities. The update proposes specific additions to include new sections on:

- Health and Wellbeing - highlighting the need for all aspects of development to promote health and wellbeing.
- Safety and Security - highlighting the need for new development to play an active role in developing, in conversation with the community, long-term strategies to ensure that in design and management, streets and spaces are safe and enjoyable to use.
- Inclusive Growth and delivering Social Value - highlighting the need for new development to contribute to reducing inequalities and increasing life chances in

local residential communities, creating opportunities for all and ensuring that investment delivers benefits where they are most needed, maximising social value.

Specific updates in the Environment chapter have been suggested in response to the Council's Climate and Ecological Emergency declaration. This is to ensure that major development sites in Euston maximise their contribution to tackling this issue. These updates supplement existing sustainability policies in the Camden Local Plan and focus on maximising resource and energy efficiency and delivering net zero carbon development. The proposed updates expect development schemes to:

- explore transforming and repurposing buildings before demolition
- maximise opportunities to reduce embodied carbon
- show how building material waste minimisation and circular economy principles have been incorporated
- achieve maximum possible on-site carbon reductions.

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

How will these changes affect people?

The EAP update retains the majority of the policies in the 2015 EAP. The EQIA was an essential part of policy development when the EAP was originally drafted and at the time it was concluded that the Plan aims to improve the area for all of Euston's residents, workers and visitors (current and future) and so the overall impact on each protected group is likely to be positive or neutral at worst. This EQIA for the EAP update, therefore, focuses on the changes to the Plan and does not seek to repeat the previous work.

This EQIA identifies which policies have been amended or are new to the Update, and, in assessing each policy, whether any could result in negative or positive impacts. Assessments of suggested EAP policy updates are set out below and identify potential outcomes related to the protected groups where possible. The proposed updates to the EAP are expected to continue to have a positive impact (as with the EAP 2015) through the provision of additional homes and jobs, a significantly enhanced urban environment, improved connectivity through the area, better streets and space and, improved transport infrastructure.

Additionally, the requirement to ensure that the new development contributes to reducing inequalities and increasing life chances in local residential communities, creating opportunities for all and ensuring that investment delivers benefits where they are most needed, maximising social value increases this potential further. It is considered that all groups will benefit in some way from the proposed updates in the EAP. Particular effects relating to individual protected groups are identified and discussed below and an assessment of the individual policy updates are provided in appendix XX.

What are the decision makers being asked to decide?

The Cabinet is being asked to agree to consult on the draft update to the EAP. Following this first formal stage of consultation, the updated plan will be revised in light of consultation responses and will follow the necessary legislative steps (including a public examination) before it is adopted as one of Camden's development plan documents (subject to approval).. This EQIA will be developed iteratively as the EAP Update is progressed through various stages

of consultation and decision making.

The assessment shows that most impacts on protected groups will be positive and protected groups are unlikely to be significantly negatively affected by the update to the EAP.

Notes to Question 1

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

Question 2

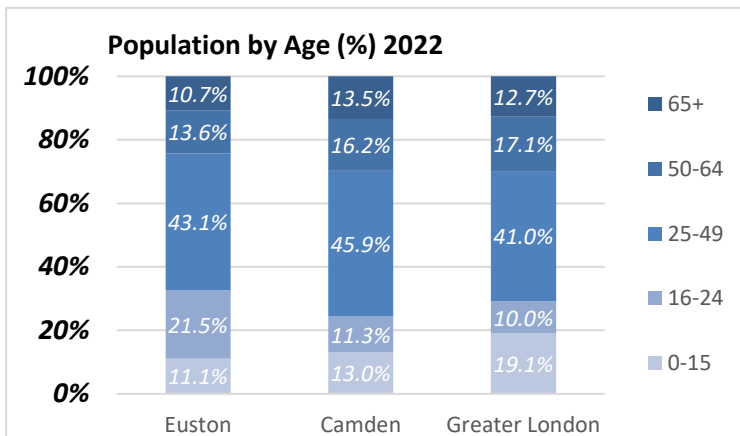
Who will be affected by this decision and how?

In particular do those from protected groups benefit or will they experience specific and disproportionate impacts? Will there be any direct or indirect discrimination?

The protected group characteristics comprise the following:

- Age;
- Disability;
- Gender reassignment;
- Pregnancy and Maternity;
- Marriage and Civil Partnership;
- Race;
- Religion/Belief;
- Sex; and
- Sexual Orientation.

Age



Source: ONS Mid-year Estimates, © ONS Crown Copyright

Euston has a relatively younger population than the rest of Camden and London, which is driven by more than a fifth (21.5%) of the population aged between 16 and 24. This is reflective of the presence of University College London (UCL) to the south of Euston as well as other education establishments such as Royal Academy of Dramatic Arts (RADA), the School of Oriental and African Studies (SOAS) and associated halls of residence and other student accommodation.

Conversely, the Euston area has lower than average proportions of under 16s and over 65s, both of which account for approximately 11% each of the population. These are both lower than the age distributions seen in Camden and London.

The EAP and its related projects are not expected to have a negative impact on people regardless of their age. The overall vision and objectives of the EAP are considered to have positive impacts and benefits for all groups, regardless of their age.

Disability

Health deprivation data from 2019 Indices of Deprivation indicate that specific parts of the Euston area perform relatively poorly in relation to health deprivation and disability. The local super output area (LSOA) that includes Euston Station and streets to the west, as well as the LSOA to the west covering a portion of Regent’s Park Estate is among the 20%-30% most deprived LSOAs in England.

Gender Reassignment

Data on gender reassignment figures is not available at the Euston area level, however a study by the Gender Reassignment Education and Research Study funded by the Home Office found that there is an estimated number of 300,000 to 500,000 transgender people within the UK.

Pregnancy and Maternity

There is no specific data on births in the Euston area. In 2021 there were 2,317 live births in Camden.

Marriage and Civil Partnership

The 2011 Census showed the proportion of households comprising a married/civil partnership couple in the Euston area is 17.4%, slightly lower than the borough average of 20.2%. The study area has slightly lower proportion of cohabiting couples (7.3%) compared to the borough average (9.8%), and slightly more lone parents (12.6% compared to 10% across the borough).

Race

According to the 2011 Census, the Euston area has a comparatively high proportion of residents from Black and Minority Ethnic groups (46.5% of residents compared to a borough average of 33.7%). The largest minority groups in the study area are Bangladeshi (12.5%) and Black African (7%).

Ethnicity (summary)		
	Euston Area	Camden
White British	35.3%	44.0%
Black and Minority Ethnic Groups	46.5%	33.7%
Bangladeshi	12.5%	5.7%
Black African	7.0%	4.9%
White Irish	4.1%	4.6%

Source: 2011 Census

Ethnicity (full breakdown)		
	Euston Area	Camden
White		
English/Welsh/Scottish/Northern	35.3%	44.0%
Irish/British		

Irish	2.4%	3.2%
Gypsy or Irish Traveller	0.1%	0.1%
Other White	15.7%	19.0%
Mixed/multiple ethnic groups		
White and Black Caribbean	0.9%	1.1%
White and Black African	1.1%	0.8%
White and Asian	1.3%	1.8%
Other Mixed	1.7%	1.9%
Asian/Asian British		
Indian	2.8%	2.8%
Pakistani	0.8%	0.7%
Bangladeshi	12.5%	5.7%
Chinese	5.0%	2.9%
Other Asian	4.7%	4.0%
Black/African/Caribbean/Black British	46.5%	33.7%
African	7.0%	4.9%
Caribbean	1.6%	1.6%
Other Black	2.2%	1.7%
Other ethnic group		
Arab	2.3%	1.6%
Any other ethnic group	2.4%	2.3%

Source: 2011 Census

Religion and Belief

The 2011 Census found that 32.6% of all Euston residents identified themselves as Christian, slightly less than across the borough (34%). It is notable that there is a comparatively large proportion of Muslims in the study area (21.1%) compared to the borough average (12.1%). There was a relatively small proportion of Jewish residents in Euston (1.3% compared with the borough average of 4.5%). A further 3.7% of Euston's residents indicated that they had other religions such as Buddhist, Hindu and Sikh. There are slightly fewer people of no religion in the Euston area compared with the borough average.

Religion	Euston Area	Camden
Christian	32.6%	34.0%
Muslim	21.1%	12.1%
Jewish	1.3%	4.5%
Other religions	3.7%	3.5%
No religion	21.0%	25.5%
Religion not stated	20.3%	20.5%

Source: 2011 Census

Sex

As of the 2011 Census, 49.9% of all residents living in Euston in 2011 were male, and 50.1% of all residents were female. Borough-wide, 49% of all residents are male and 51% are female.

Sexual Orientation

Under-reporting on the size of lesbian, gay and bisexual communities is a recognised issue and is therefore difficult to accurately understand the size of this proportion of the population, particularly at borough level. An upper estimate for London suggests that roughly 10% of the population is lesbian, gay or bisexual. However it is accepted that these figures may under-represent the size of this population due to societal issues surrounding the disclosure of sexual orientation.

Consultation

The development of Euston station is a long-term and complex project, which involves many organisations and has already spanned several years. The long timescales involved in the delivery of development at Euston means that it can, at times be difficult to engage the community in discussions about future benefits when currently all that they are seeing are the negative impacts associated with the construction and delivery of the HS2 station and limited delivery of the priorities they previously identified.

Given the number of individual projects at Euston there are also a number of demands on community member's time, with the various projects at Euston seeking to engage directly with them. As a principle, the Euston team have tried to avoid asking the same people the same questions and instead have sought to build on the inputs to date— focussing on trying to ensure that there is engagement with as much of the community as possible, focusing on priorities that apply to all the projects and what good outcomes mean to local communities.

Engagement for the update to the EAP builds on the engagement and consultation that has happened to date, including on the draft Euston Planning brief. Please see Appendix X - 16th October 2019 report of the Cabinet Member for Investing in Communities and an Inclusive Economy 'Euston Station Area Planning Brief – draft document consultation (SC/2019/65)'.

Given the significant crossover between the draft planning brief and the EAP, it was decided that the team would focus efforts on updating the EAP in order to ensure that there is a robust and up to date framework by which to assess development at Euston. The production of the draft planning brief and what we have learnt through the consultation process was an important step in developing the planning framework for Euston. Where appropriate, comments received and issues identified through the consultation on the draft planning brief have been explored in the EAP update.

The update to the EAP has included a range of consultation and engagement, with informal engagement with communities. In addition to ongoing conversations with members and officers across various Council departments, Camden has undertaken a series of engagement events. These have taken place among ongoing communication with local stakeholder groups and participation at community meetings.

Euston Residents Advisory Group (RAG)

Building on the Council's longstanding interest in 'deep dialogue', and in citizens' assembly models of deliberative democracy, and on an earlier (2018-20), related initiative – the Euston Residents Assembly – that helped shape the draft Euston Planning Brief, the Euston Residents Advisory Group (RAG) brings together a diverse, broadly demographically representative group of 30 adult Camden residents, recruited and randomly selected with help from the Sortition Foundation.

The RAG's first took place in 2020-21. Over six two-hour sessions (held online due to the COVID-19 pandemic) the group developed a set of recommendations, to (amongst other things) help directly shape local planning policy, through feeding into the update of the EAP.

No previous knowledge or experience of planning or regeneration issue was/is required to

participate in the RAG. People who might not normally participate in this kind of activity were actively encouraged to apply and members are given vouchers to thank them for taking part. Members were offered technical support and computer devices, as well as support with childcare or other caring responsibilities, or to meet any specific inclusion or access needs.

In order for (i) the RAG to benefit from the insight of Euston's many established local voluntary and community groups, and (ii) those groups to be kept abreast of the RAG process, two further workshops were held. One ahead of Session 1, to capture wider aspirations for change in Euston and for the EAP update, and one in December 2021 to capture reflections on the emerging recommendations to share back with the RAG. The RAG recommendations largely aligned with the views of this network, reinforcing common concerns.

The Euston RAG continues, with Lendlease working with the group to develop their Masterplan proposals.

Camden has continued to hold community and business workshops at key points in the development of the update. Topics covered by both groups include:

- Culture and Community
- Open Space and Connections
- Healthy Streets
- Design Codes
- Health & wellbeing and Social Infrastructure
- Social Value
- Good Life Euston

Feedback highlighting concerns around: open spaces and quality and maintenance of the public realm; concerns around safety and security; the need to ensure that development delivers for local communities and that benefits are felt and accessible across the Euston area. Feedback from the sessions have been incorporated into the proposed EAP updates.

Assessed Impact (please also appendix XX)

The proposed update to the EAP includes a requirement that new development should contribute to reducing inequalities and increasing life chances in local residential communities, creating opportunities for all and ensuring that investment delivers benefits where they are most needed. It should maximise social value at the planning, construction and end user phases, including supporting increased access to jobs, skills training and educational opportunities. These proposed updates have the potential to positively affect all people living and working in Euston.

In order to help address lower-than-average educational attainment in Euston and concerns about youth safety, the proposed update to the EAP includes requirements which seek to address these issues through provide meaningful skills development ad work opportunities; development of youth facilities and programmes that reach young people during and outside of school hours; establishing with children and young people as a core part of community facility and service delivery and for development to provide space that meets the needs of children and young people of all ages. This proposed update is considered to have a positive effect on young people.

Older members of the Euston community face challenges of social isolation and physical barriers. In order to address this, development must create an environment with convenient and legible connections with accessible routes to shops, open spaces, schools, social spaces, support services and other community facilities. Connections through and across the station are essential to achieving this and support existing organisations serving older adults in Camden and consider promoting intergenerational programming.

These proposed additions are considered to have the potential to promote equality of opportunity and to foster good relations between different groups in the community.

In combination with the development plan and other planning guidance, the proposed updates to the EAP aim to continue to highlight and strengthen a positive approach to health and well-being. The creation of healthy environments for people of all ages across the Euston area will be a key consideration when the Council assesses planning applications. Applications for major development at Euston will be required to include a Health Impact Assessment.

The proposed updates state that applicants should demonstrate how they have considered this important cross-cutting theme from an early stage, providing for a healthy environment, active travel, open space, fitness opportunities, safety and security, animated street life, connectivity and accessibility across Euston, the delivery of integrated community facilities and programmes, cultural opportunities and social spaces for all of Euston's communities.

The successful delivery of all of these elements is essential to making Euston a thriving place and should be planned for in all construction stages and they should help to improve the lives of all residents, including those with disabilities and health concerns.

The EAP aims for overall improvements in the area from which people should benefit regardless of their race or ethnic background. Although there is limited data available (due to a lack of reporting), there is a perception that not all groups are represented in planning consultations. Through the Euston RAG and in this first formal consultation stage for the EAP update, the team will be working with the Community Liaison Team and we seek to attend existing community groups such as school coffee mornings and to offer a translation service, with officers able to speak a range of languages including Bengali, Hindi, Urdu, Somali and Spanish to try to ensure that people from all backgrounds are included in the process.

In recognising that culture is a connecting force that should be rooted in all aspects of Euston's growth, the proposed policy updates suggest that a cultural strategy for the area should be open to evolution and change and draw from all of Euston's communities and functions. Euston will not be defined by a single culture, but an array of identities that should all have an opportunity to express themselves on their own terms. The support of existing and creation of new cultural, leisure, learning and play facilities will be an integral part of development, and the experience of living and working in, and visiting Euston. It is considered that all groups will benefit in some way from the policies in the proposed update.

In conclusion, the proposed updates to the EAP aim for overall improvements in the area from which people should benefit regardless of their protected characteristics. It was assessed that

no disproportionate effects on protected groups were found to be likely from the proposed updates to the EAP.

Notes to Question 2

- Here use data to show who could be affected by the decision. Consider who uses the service now and might use it in the future. Think about the social mix of the borough and of our workforce.
- If available use profile of service users and potential users / staff by protected groups: (age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation). You could consider the following:
 - Take up of services, by protected group if available;
 - Recommendations from previous inspections or audits;
 - Comparisons with similar activities in other departments, councils or public bodies;
 - Results of any consultation and engagement activities broken down by protected groups (if available) - sources could include, complaints, mystery shopping, survey results, focus groups, meetings with residents;
 - Potential barriers to participation for the different protected groups;
 - National, regional and local sources of research or data – including statutory consultations;
 - Workforce equality data will be provided by your HR change adviser for organisational change / restructure EIAs and
 - For organisational change / restructure EIAs include the results of any consultation or meetings with staff or trade unions.
- **Do not simply repeat borough wide or general service equality data** – be as precise and to the point as possible.
- If there are gaps in equality information for some protected groups identify these in this section of the form and outline any steps you plan to take to fill these gaps. Consider:
 - Any relevant groups who have not yet been consulted or engaged;
 - Whether it is possible to breakdown existing data or consultation results by different protected groups;
 - If you are conducting an organisational change / restructure EIA and there are data gaps consider asking affected staff to update their details on Oracle.
- We are under a legal duty to be properly informed before making a decision. If the relevant data is not available we are under a duty to obtain it and this will often mean some consultation with appropriate groups is required.
- Is there a particular impact on one or more of the protected groups? Who are the groups and what is the impact?
- Consider indirect discrimination (which is a practice, policy or rule which applies to everyone in the same way, but has a worse effect on some groups and causes disadvantage) - for example not allowing part-time work will disadvantage some groups or making people produce a driver's licence for ID purposes.

Question 3

Does the proposed decision have an impact (positive or adverse) on our duty to eliminate discrimination/harassment and victimisation, promote equality of opportunity or foster good relations between different groups in the community (those that share characteristics and those that do not)?

Overall it is viewed the proposed policy updates will have a positive impact on our duty to promote equality of opportunity and will help foster good relations between different groups in the community.

The main purpose of the proposed updates to the EAP is to ensure that the adopted Plan for the area reflects the latest information and an up to date evidence base, providing a robust, up to date set of policies by which to assess any future applications for the area and helping to deliver the Plans vision and objectives, implementation of which should help to ensure that new development helps create safe, socially mixed and balanced areas with strong, cohesive and resilient communities.

As demonstrated in the response to Question 2 there are a number of specific points within the proposed updates that help to foster good relationships and reduce the risk of harassments recognising the identified inequalities in the local area; what we have been told through consultation about the perceived lack of local benefits associated with recent major developments in the area and the ongoing impact of HS2 works on local communities. The proposed updates highlight more explicitly the need to ensure that new development contributes to reduce inequalities and increase life chances in local residential communities, creating opportunities for all and ensuring that investment delivers benefits where they are most needed, maximising social value and addressing concerns around safety and security. The update proposes specific additions to include new sections on:

- Health and Wellbeing - highlighting the need for all aspects of development to promote health and wellbeing.
- Safety and Security - highlighting the need for new development to play an active role in developing, in conversation with the community, long-term strategies to ensure that in design and management, streets and spaces are safe and enjoyable to use.
- Inclusive Growth and delivering Social Value - highlighting the need for new development to contribute to reducing inequalities and increasing life chances in local residential communities, creating opportunities for all and ensuring that investment delivers benefits where they are most needed, maximising social value.

It should also be noted through the engagement to date that the Euston team has sought to engage with a range of stakeholders including organisations that represent specific groups and communities for their views. This will continue as part of the consultation for the proposed updates to the EAP.

Notes to Question 3

- Here, think about our other duties (see the notes at the end) and do the proposals impact (positive and or negative) upon those wider duties and aspirations?
- What might say a reduction in the hours of a facility that mainly serves a particular group have on our wider duties?
- Examples of eliminating discrimination: Taking action to ensure that services are open to all groups – e.g. targeting help at particular deprived sections of the community or funding services who work to prevent discrimination
- Does take up of the activity differ between people from different protected groups?
- Have the outcomes of your consultation and engagement results identified potentially negative or positive impacts?
- Are some groups less satisfied than others with the activity as it currently stands?
- Is there a greater impact on one protected group, is this consistent with the aims of the activity?
- For organisational change / restructures analyse the outcomes of consultation with staff and trade unions and analyse the staff data provided by your change adviser
- If you have identified negative impacts include details of who these findings have been discussed with (e.g. Legal, HR) and their views
- Are there any further changes that could be made to deliver service improvements or make the activity more responsive?

Question 4

If there is an adverse impact, can it be avoided?
If it can't be avoided, what are we doing to mitigate the impact?

No adverse resulting from the policies in the plan were identified.

However it is worth noting that poor air quality is likely to increase as a result of largescale construction work at Euston, leading to adverse impacts on health, particularly on the most vulnerable such as young children, the elderly and those with health conditions. Mitigation is set out in the EAP review in terms of Euston Road being identified as an Air Quality Focus Area and will use sustainable and innovative development which delivers a low or zero emission neighbourhood. Policy EAP4 requires development proposals to mitigate air quality issues.

Notes to Question 4

- Assuming there is an impact, what are we going to do about it? We need to make sure the **decision makers understand the impacts**
- All our policies and decisions should be designed to eliminate discrimination and contribute to our other obligations such as promoting good relations.
- If it can't be avoided can it be mitigated in some other way?
- There might be decisions elsewhere or perhaps additional spending on other services which could reduce the impact. Beware of simply saying that we will direct service users to other services or resources without considering the feasibility of doing so or the knock-on effect for those services
- We don't have to completely eliminate a negative impact, but we must identify it and try to mitigate it and the **decision makers must be in a position to fully understand the implications of their decision and balance off the competing interests** – e.g. the impact against the need to make savings and balance our budget

Question 5

Could any part of the proposed activity discriminate unlawfully?
Can we advance equality of opportunity via this decision/policy?
Can we foster good relations via this decision/policy?

Applications for development at Euston will be assessed against the policies in the Local Plan which includes the EAP and the update once adopted. The Council will use the updated EAP in its planning decisions, which will allow the delivery of the positive impacts identified in this assessment.

No part of the proposed activities are considered to discriminate unlawfully. The responses to questions above set out how it is considered that we can advance equality of opportunity and foster good relations via the proposed updates to the EAP through the delivery of the Plan's vision and objectives.

Notes to Question 5

- **There may be decisions or policies where this is not going to be applicable. Explain this briefly in the box above. The important point is that it is carefully considered.**
- Suggest positive steps that can be achieved towards our statutory obligations to remove or minimise disadvantages suffered because of protected characteristics, e.g. taking steps to meet the needs of people from the different backgrounds when they are different to the needs of others, encouraging participation from groups when participation is disproportionately low
- Advancing equality of opportunity - (NB this does not apply to marriage and civil partnership). **This is a “positive duty”** which requires public authorities to consider taking proactive steps to root out discrimination and harassment and advance equality of opportunity in relation to their functions—from the design and delivery of policies and services to their capacity as employers. The duties require us to give consideration to taking positive steps to dismantle barriers. Advancing equality of opportunity might require treating some groups differently e.g. targeting training at disabled people to stand as councillors.
- **The legislation requires when we have due regard in terms of advancing equality of opportunity to:**
 - a. **Remove/minimises disadvantage suffered by those who share a characteristic and is connected to it**
 - b. **Take steps to meet the different needs of those who share a characteristic**
 - c. **Encourage those who share a characteristic to participate in public life or any other activity when participation is disproportionately low.**
- Advancing opportunity includes the fact that the steps needed to meet the needs of disabled persons take into account the disabled persons’ disabilities
- We are required to have “due regard” to the need to foster good relations between people who share a relevant protected characteristic and people who do not share it. This involves having due regard, in particular, to the need to tackle prejudice, and promote understanding.

Examples

- An employer to provide staff with education and guidance, with the aim of fostering good relations between its trans staff and its non-trans staff.
- A school to review its anti-bullying strategy to ensure that it addresses the issue of homophobic bullying, with the aim of fostering good relations, and in particular tackling prejudice against gay and lesbian people.
- Local authority (Not Camden) to introduce measures to facilitate understanding and conciliation between Sunni and Shi’a Muslims living in a particular area, with the aim of fostering relations between people of different religious beliefs.
- Our work to encourage Bangladeshi tenants involvement in TA’s.

EIA prepared by: Therese Gallagher, Euston Manager

Date: July 2022

EIA checked by: WIP reviewed by Kate Goodman

Date: September 2022

EIA approved by: _____

Date: _____

(Relevant Director Sponsor)

What to do upon approval

For organizational change: If your EIA relates to internal staff, please send to your HR Business Adviser.

For all other EIAs: Please upload onto Sharepoint via this link:

[Equality Impact Assessment Library](#)

Appendix 1

POLICY	PROTECTED CHARACTERISTIC	IMPACT	ASSESSMENT
Strategic Principle EAP1: Land use strategy A: Overall mix B: Homes C: Economy & employment D: Retail & Leisure E: Social Infrastructure F: Meanwhile Use G: Health and Well-being H: Safety and Security I: Inclusive Growth and delivering Social Value			<p>This policy seeks to achieve a balance of uses across the EAP area, setting out updated targets for homes and jobs. The proposed updates reflect the reduction in land available for development which means less housing and commercial floorspace is expected to be delivered when compared with the delivery figures set out in the 2015 EAP. However, the addition of a significant number of homes is considered to be a positive benefit for all protected groups. A proportion of these homes would be affordable. 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. Ten percent of new-build self-contained homes would be required to be suitable for occupation by a wheelchair user or easily adaptable. Provision of these homes would therefore increase the overall availability of accessible homes to those with disabilities.</p> <p>The same assessment can be applied to jobs. Additional commercial floorspace, can potentially increase the range of job opportunities available, to the benefit of all seeking employment, but particularly those protected groups who are otherwise disadvantaged in the jobs market and may be disproportionately represented in terms of barriers to accessing work, skills and qualifications. These barriers can result from issues relating to: language; cultural factors; family requirements and the need for flexible and/or part-time work. Young people, older people, family carers and ethnic minorities tend to have disproportionate challenges accessing employment because of these factors.</p> <p>Black and Minority Ethnic (BAME) groups account for a disproportionately high share of London's job seekers – two thirds of all job seekers are from ethnic minorities (compared to 40% of London's overall BAME population). The Euston area has a comparatively high proportion of residents from Black and Minority</p>
	Age	+ve	
	Disability	+ve	
	Gender reassignment	neutral	
	Pregnancy and Maternity	+ve	
	Marriage and Civil Partnership	Neutral	
	Race	+ve	
	Religion/Belief	Neutral	
	Sex	Neutral/ +ve	
	Sexual Orientation	Neutral/ +ve	

POLICY	PROTECTED CHARACTERISTIC	IMPACT	ASSESSMENT
			<p>Ethnic groups (46.5% of residents compared to a borough average of 33.7%). The largest minority groups in the study area are Bangladeshi (12.5%) and Black African (7%). Employment seekers from these groups could potentially benefit from the increase in jobs in the EAP area.</p> <p>In considering updates to the Economy and Employment section, it was important to reflect what we heard from local communities in community engagement events about their interactions (or lack thereof) with the major institutions and companies in the local area, with the proposed updates seeking to address this, with an expectation to sign up to the Euston Partnership's Social Value Charter which include objectives which support lifelong learning and opportunities for local residents in the development.</p> <p>Supporting the knowledge economy could also provide further benefits. Included within this sector are higher education facilities, the growth of which will assist younger people to further their education within the borough. Medical and life science organisations also form a key part of Camden's knowledge economy. Advances in medicine as a resulting of supporting the needs of these organisations could assist in improving the long term health and wellbeing of local residents.</p> <p>The proposed update includes a requirement that new development should contribute to reducing inequalities and increasing life chances in local residential communities, creating opportunities for all and ensuring that investment delivers benefits where they are most needed. It should maximise social value at the planning, construction and end user phases, including supporting increased access to jobs, skills training and educational opportunities. It also seeks to ensure that new development addresses health and wellbeing and concerns around safety and security</p> <p>Together, it is considered that this approach should provide opportunities to advance equality of opportunities and foster good relations within communities?.</p>

POLICY	PROTECTED CHARACTERISTIC	IMPACT	ASSESSMENT
			<p>More specifically the proposed additions to the policy include:</p> <p>Social Infrastructure: updated to include reference to opportunities for Culture which provides opportunities that are rich, interactive and accessible and attractive to the whole community, complementing and building on the existing cultural heritage of the area.</p> <p>For many, local community centres and cultural centres are the main source of support, particularly for people from Ethnic Minorities. These centres support social activity and provide help and advice for dealing with life’s difficulties. The proposed update includes a requirement for major developments at Euston to:</p> <ul style="list-style-type: none"> • Develop a robust Community Engagement Plan, to identify local priorities for community facilities, the Plan should be developed in conjunction with the local community and Council Officers; • Provide new facilities that are purposely designed and configured to optimally meet their community function. Spaces should be flexible and managed to promote shared ownership and rotated use among a diversity of local groups; <p>These proposed changes should help to promote equality of opportunity for all members of the community.</p> <p>Protecting and enhancing arts and cultural facilities can provide particular benefits for ethnic, religious and LGBT communities. These venues and spaces are often highly valued by the groups they serve because of their relative scarcity and the fact they have been designed or adapted to serve the distinct needs of the group or community.</p> <p>In combination with Camden’s Local Plan and other planning guidance, the proposed updates to the EAP aim to continue to highlight and strengthen a positive approach to health and well-</p>

POLICY	PROTECTED CHARACTERISTIC	IMPACT	ASSESSMENT
			<p>being. The creation of healthy environments for people of all ages across the Euston area will be a key consideration when the Council assesses planning applications. Applications for all major development at Euston will be required to include a Health Impact Assessment which will assess how a proposed planning decision will affect the health of a population and whether vulnerable populations are more likely to be impacted.</p> <p>It will be important that applicants demonstrate how they have considered this important cross-cutting theme from an early stage, providing for a healthy environment, active travel, open space, fitness opportunities, safety and security, animated street life, connectivity and accessibility across Euston, the delivery of integrated community facilities and programmes, cultural opportunities and social spaces for all of Euston's communities.</p> <p>The successful delivery of all of these elements is essential to making Euston a thriving place and should be planned for in all construction and operation stages, and should help to improve the lives of all residents, including those with disabilities</p> <p>F: Meanwhile uses - updated to reference different phases of Euston OSD and the need to ensure a cohesive and thoughtful approach to meanwhile uses to energise spaces, creating social and economic value, and opening up opportunities to new ventures.</p> <p>G: Health and Well-being - highlights the need for all aspects of development to promote health and wellbeing in line with the Camden Health and Well-being Strategy..</p> <p>The most recent Camden Joint Strategic Needs Assessment (JSNA) shows an overall improvement in health in Camden however the Borough remains one of the most unequal places in London and</p>

POLICY	PROTECTED CHARACTERISTIC	IMPACT	ASSESSMENT
			<p>the health gap continues to widen.</p> <p>H:Safety and Security - highlights the need for new development to play an active role in developing, in conversation with the community, long-term strategies to ensure that in design and management, streets and spaces are safe and enjoyable to use.</p> <p>Despite overall crime in Camden in falling, some types of crime are increasing and Crime in both Regents Park and Somers Town wards in 2020-21 was above the Camden average. This policy seeks to improve safety within the area through effective management of building uses and ensuring that safety is considered within the design of buildings and the public realm.</p> <p>The policy is likely to benefit protected groups particularly affected by crime and fear of crime within the public realm. Men are at most risk from violent crime particularly 'stranger violence' much of which will occur within the public realm. The policy seeks the use of active frontages to encourage pedestrian use and the use of management agreements for town centre uses with the potential to cause antisocial behaviour. Increased pedestrian use has the effect of deterring crime via natural surveillance.</p> <p>I: Inclusive Growth and delivering Social Value - highlights the need for new development to contribute to reducing inequalities and increasing life chances in local residential communities, creating opportunities for all and ensuring that investment delivers benefits where they are most needed, maximising social value.</p> <p>organisations will provide benefits for all and in particular disabled and older people.</p>

POLICY	PROTECTED CHARACTERISTIC	IMPACT	ASSESSMENT
Strategic Principle EAP2: Urban design strategy	Age	+ve	Proposed updates to the policy include: <ul style="list-style-type: none"> Continued emphasis on connectivity across both stations and creating routes as a continuation on street network, highlights importance of giving them feel and appearance of streets, and coordination and phasing of development to ensure earliest possible delivery of new routes Building heights, massing and scale updated to satisfy London Plan tall buildings policy (addition of location suitable for tall buildings) More detail on key design considerations (street level, servicing, energy and carbon, clustering, local views) New commercial buildings to maximise openness and permeability, enabling wider public access to lobby spaces and roof gardens wherever possible, avoiding closed campus-style developments. Ensure that commercial buildings are designed flexibly to support future reconfiguration for different activities and uses (e.g. offices to laboratories) <p>It is considered that the Urban Design Strategy which seeks to achieve high quality design which is accessible and attractive to all should have positive benefits for how everyone experiences and interacts with the public realm and the built environment in Euston. The policy seeks to achieve well designed accessible places which should help with movement and wayfinding benefiting all people but especially those with mobility issues and expectant parents and those with young children.</p>
	Disability	+ve	
	Gender reassignment	+ve	
	Pregnancy and Maternity	+ve	
	Marriage and Civil Partnership	+ve	
	Race	+ve	
	Religion/Belief	+ve	
	Sex	+ve	
	Sexual Orientation	+ve	
Strategic Principle EAP3: Transport strategy	Age	neutral	At the core of the transport strategy is the ambition to ensure that Euston is accessible and easy to navigate for all. It prioritises walking and cycling, benefiting those in lower age groups who are more likely to be on lower incomes. The approach also has positive impacts on people of all ages, encouraging more active travel which should in turn improve health outcomes for all. Buses and other public transport modes are also prioritised, with access for private
	Disability	neutral	
	Gender reassignment	Neutral/+ve	
	Pregnancy and Maternity	Neutral	
	Marriage and Civil	Neutral/+ve	

POLICY	PROTECTED CHARACTERISTIC	IMPACT	ASSESSMENT
	Partnership		cars limited to residents and essential access as much as possible.
	Race	Neutral/+ve	
	Religion/Belief	Neutral/+ve	
	Sex	Neutral/+ve	
	Sexual Orientation	Neutral/+ve	<p>The provision for passengers with reduced mobility on Eversholt Street to access taxi or other personal transport services should ensure that those with physical disabilities are not disadvantaged by having to travel further to a taxi rank if using the Network Rail station.</p> <p>The proposed updates are likely to assist all groups in the area, including protected groups whose accessibility to facilities and services is affected by the current poor connectivity in some parts of the area.</p> <p>In general the guidance will have a positive effect on most people living and working in Euston as it will help improve air quality, free up space to make more efficient use of land and make the environment friendlier for pedestrians and cyclists.</p> <p>The transport strategy seeks to ensure that developments prioritise walking, cycling and public transport as the main means of travel to and from a site. Elements of the policy include the requirement to improve conditions for pedestrians and cyclists and to improve bus facilities. The policy will be of particular benefit to young people and older people whom are more likely to be reliant upon the existing bus network.</p>
Strategic Principle EAP 4: Environment	Age	Neutral/+ve	
	Disability	Neutral/+ve	
	Gender reassignment	Neutral/+ve	
	Pregnancy and Maternity	Neutral/+ve	
	Marriage and Civil Partnership	Neutral/+ve	
	Race	Neutral/+ve	
	Religion/Belief	Neutral/+ve	<p>Specific updates in the Environment chapter have been suggested in response to the Council's Climate and Ecological Emergency declaration in 2019. This is to ensure that major development sites in Euston maximise their contribution to tackling this issue. These updates supplement existing sustainability policies in the Camden Local Plan and focus on maximising resource and energy efficiency. The proposed updates expect development schemes to:</p> <ul style="list-style-type: none"> • explore transforming and repurposing buildings before demolition • maximise opportunities to reduce embodied carbon

POLICY	PROTECTED CHARACTERISTIC	IMPACT	ASSESSMENT
	Sex	Neutral/+ve	<ul style="list-style-type: none"> • show how building material waste minimisation and circular economy principles have been incorporated • achieve maximum possible on-site carbon reductions. <p>The environmental impact of the proposed update has been assessed through the Sustainability Appraisal. The proposed updates have the potential to help to increase the Life expectancy of local residents and visitors linked to air quality.</p> <p>The environmental strategy (EAP4)) would be likely to provide a range of positive impacts due to improvements to energy and climate change mitigation from the proposed local carbon and zero emission heating and renewable technologies and delivering net zero carbon development. , There would be social and local environment benefits resulting from an emphasis on open space and green infrastructure, reduction in surface water flood risk, and positive impacts in terms of air quality and noise as a result of the proposed ultra low emissions zone. This has particular benefits for children / young people, elderly people and some people with health conditions who have been identified as particularly sensitive to health problems caused by air pollution.</p> <p>The EAP review includes promotion of active travel in order to reduce reliance on private motor vehicles and promote sustainable forms of transport such as walking and cycling which also have health benefits.</p> <p>It should also be noted the Council will consult with a range of stakeholders including organisations that represent specific groups and communities for their views.</p>
	Sexual Orientation	Neutral/+ve	
Strategic Principle EAP 5: Open Space (new)	Age	Neutral/+ve	<ul style="list-style-type: none"> • More reference to green infrastructure – throughout construction and completion phases (inc. UGF) • Reference to HS2 mitigation and EMRs • Inclusion of Principles for Open Space <ul style="list-style-type: none"> - Cohesive network of spaces
	Disability	Neutral/+ve	
	Gender reassignment	Neutral/+ve	
	Pregnancy and Maternity	Neutral/+ve	

POLICY	PROTECTED CHARACTERISTIC	IMPACT	ASSESSMENT
	Marriage and Civil Partnership	Neutral/+ve	<ul style="list-style-type: none"> - Serve different users & community engagement & co design for community orientated spaces (especially) - Range of functions & high-quality design - Designed and managed to be welcoming and accessible - Programming of spaces and need to retain public accessibility and active user involvement in management - Positive relationship to buildings - development should not impair the quality of the space, deter users of the space or make it feel private. <ul style="list-style-type: none"> - Adjacent uses should be compatible with the intended audience of the open space - Open Space and Green Infrastructure Strategy and Management Plan <p>The proposed updates to the Plan recognise the importance of open space, including the need for the space lost through HS2 construction to be mitigated. . The Plan provides for the provision additional public open space along with an improved network of open space through enhancements to the quality and accessibility of existing spaces. New and improved public open space can add to quality of life for all groups, but may be particularly valued by some groups such as children and older people. The Plan aims to ensure that spaces are accessible to all including people with disabilities and people who feel vulnerable to crime in some circumstances (e.g. older people, women). Public open space will need to be designed with a view to accessibility and public safety.</p>
	Race	Neutral/+ve	
	Religion/Belief	Neutral/+ve	
	Sex	Neutral/+ve	
	Sexual Orientation	Neutral/+ve	
Places <ul style="list-style-type: none"> • Euston station and tracks • Euston Road • Camden Cutting • Drummond Street and Hampstead Road • Regents Park Estate • Amptill & Mornington Crescent Station • West Somers Town 	Age	Neutral/+ve	<p>This chapter of the Plan sets out the proposals for each of the seven character areas in details. It sets out in more detail what is expected of proposals in order to meet the requirements of the Development Principles set out in the policies assessed above and are therefore assessed to have broadly the same impacts. The area-based development principles in Part 4 seek to achieve a coordinated approach to change in each area, addressing a range of issues including transport, public realm, environment and open space as well as land use. This will ensure that the benefits of growth to the area and its community are optimised.</p>
	Disability	Neutral/+ve	
	Gender reassignment	Neutral/+ve	
	Pregnancy and Maternity	Neutral/+ve	
	Marriage and Civil Partnership	Neutral/+ve	
	Race	Neutral/+ve	
	Religion/Belief	Neutral/+ve	
	Sex	Neutral/+ve	

POLICY	PROTECTED CHARACTERISTIC	IMPACT	ASSESSMENT
	Sexual Orientation	Neutral/+ve	The chapter identifies potential development sites across the seven Places.
Delivery, Planning benefits and monitoring	Age	Neutral/+ve	<p>This chapter of the Plan sets out the approach to the delivery, planning benefits and monitoring of the EAP' vision and objectives.</p> <p>The provision of s106 planning obligations and community infrastructure levy (CIL) contributions from development schemes in the area will form an important role in the delivery of infrastructure and facilities to support the plan, in addition to infrastructure being delivered as part of wider changes and mitigation works in connection with the redevelopment of Euston Station.</p> <p>In conjunction with the work with the Euston Partnership to develop a social value charter, the EAP review will bring about positive benefits.</p>
	Disability	Neutral/+ve	
	Gender reassignment	Neutral/+ve	
	Pregnancy and Maternity	Neutral/+ve	
	Marriage and Civil Partnership	Neutral/+ve	
	Race	Neutral/+ve	
	Religion/Belief	Neutral/+ve	
	Sex	Neutral/+ve	
Sexual Orientation	Neutral/+ve		