

Camden Council Equality Impact Assessment Form

Euston Area Plan Update - Proposed Submission Draft

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Title of the activity	
Euston Area Plan Update – Proposed Submission Draft	
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Version number and date of update	
September 2025	

Step 1: Clarifying aims

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

- ☐ New
☒ Under review
☒ Being changed

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

- ☐ Staff
☒ Residents
☐ Contractors
☐ Other (please detail):

1.c Which Directorate does the activity fall under:

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

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

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 the Euston Area Plan (EAP), a long-term strategic planning framework to guide transformational change in the area up until 2031. This was adopted in 2015. Proposals for development at Euston would 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.

The EAP covers approximately 85 hectares and includes Euston Station, part of Somers Town to the east, Regent's Park Estate and Drummond Street to the west, up to Mornington Crescent in the north 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 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 Council 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, the HS2 station redesign to accommodate 6 platforms, the Government's aspiration for establishing a Development Corporation at Euston, the establishment of a Housing Delivery Group and emerging plans for the redevelopment of 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 12 years out of date and station designs have evolved and the Euston area has been subject to demolitions and some redevelopment. In some cases, constraints, funding, deliverability and requirements have changed.

The wider context and Council priorities have also changed and evolved, with the development of Camden's Climate Action Plan and the Euston Social Value Charter. In addition, the Council has consulted on an updated Local Plan (Camden Local Plan Proposed Submission Draft) in Summer 2025. 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 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) and so the overall impact on each protected group is likely to be positive or neutral at worse.

The EAP Update (EAP 2025) refreshes the target for the delivery of housing, reflecting constraints and reduced availability of land (taking into account a better understanding of the

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areas both over and adjacent to the station and tracks which it may be possible to build on and which are likely to be funded). The proposed update to the Plan identifies capacity for:

- 1,700 to 2,100 new homes (2015 EAP: 2,800 – 3,800)
- 10,000 to 17,300 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.

In response to the Council's Climate and Ecological Emergency declaration, the EAP highlights that development at Euston should be delivered in line with the Draft Local Plan's requirement for development to meet the highest feasible environmental standards during construction and occupation, and should respond to the suite of policies which seek to ensure that new development is designed to mitigate and adapt to climate change to respond to the climate emergency, focusing on maximising resource and energy efficiency and delivering net zero carbon development which, in operation, is ultra low energy, fossil fuel free and uses low carbon heat. Euston specific elements included in the EAP require developments to:

- Explore utilising low cost, low carbon heat including waste heat sources
- Explore opportunities for local off-setting for carbon savings
- Make payments in lieu towards local Sustainable Drainage Systems (SuDS) where it is demonstrated to the Council's satisfaction that it is not possible to provide them on site as required through Local Plan policy.

This is to recognise the challenges that development associated with significant transport infrastructure may face and to ensure that major development sites in Euston maximise their contribution to tackling this issue through alternative means as appropriate. These updates supplement existing sustainability policies in the Camden Local Plan and the proposed policies expect development schemes to:

- 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
- maximise opportunities for renewable energy generation

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Step 2: Data and evidence

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

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

What will the impact of the changes be?

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

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

- ☒ Age
- ☒ Disability, including family carers¹
- ☒ Gender reassignment²
- ☒ Marriage and civil partnership
- ☒ Pregnancy and maternity
- ☒ Race
- ☒ Religion or belief
- ☒ Sex
- ☒ Sexual orientation

The EQIA data for the above characteristics was largely drawn from the Council's open data website which provides topic summary tables derived from the 2021 Census statistical outputs³ The census data provides statistics for different geographical output areas. The best fit for Euston was found to be the Middle layer Super Output Area 'E02000188' which includes Euston Station and the area to the west of the station including the Regent's Park Estate. For clarity this MSOA will be referred to as Euston in this report.

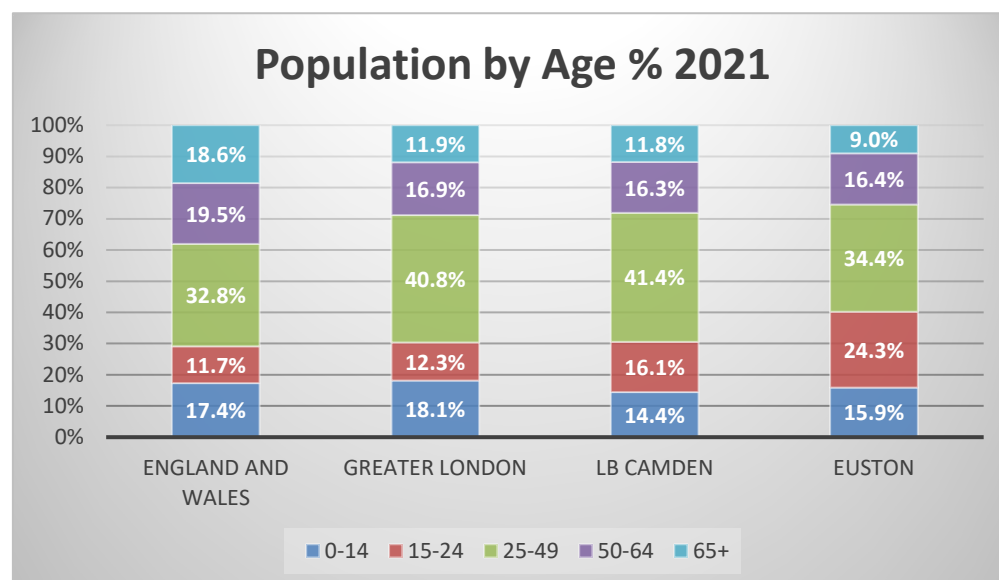
¹ This is the legal term in the Equality Act. In practice there are specific legal protections for a diverse range of people who have physical, mental and sensory impairments, long-term health conditions and/or neurodivergence, as well as carers who provide unpaid care for a friend or family member who cannot function without their support. Census and local datasets use the Equality Act definition and will include people who may not use the language of disability to describe themselves.

² This is the legal term in the Equality Act. In practice there are specific legal protections for anyone whose gender identity does not match the sex they were assigned at birth. This means, for example, that people who are trans and people who are non-binary or gender fluid are considered a specific protected group under the Equality Act.

³ All statistical outputs from the 2021 Census relate to the population defined as 'usually resident' on census day (21 March 2021). Unfortunately, that date was during a period of COVID-19 lockdown and/or restrictions which affected the number of people living in Camden. At that time, many people were absent who would normally be present – including many students, younger workers, EU nationals and people with access to alternative or second addresses.

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Age



The Euston area (MSOA E02000188) has a younger population than the rest of Camden and London, which is driven by almost a quarter of the population (24.3%) aged between 15 and 24 which is almost the double the percentage for Greater London and significantly above the proportion of this age group in Camden. The Euston area has a high student population with 20.4% of all usual residents aged 16 and over recorded as students in the 2021 Census. This compares to 12.4% of 16+ residents being students in the wider borough and 7.2% in London. The high student population may be a factor in the high proportion of those in the Euston area aged between 15 and 24. This significant student population may relate to the concentration of further education institutions to the south of the Euston Road.

Conversely, the Euston area has a lower proportion of those aged between 25 and 49 (34.4%) compared with Camden (41.8%) and London (40.8%).

The proportion of residents who are aged 50 and over is similar to the proportion in the borough and London.

Disability, including family carers

In the Euston area (MSOA E02000188), 16.7% of residents identified as having a disability at the time of the 2021 Census. This is somewhat above the Camden average (15.2%) and significantly higher than the London average of 13.2%. It is also noted that 8.2% of residents have their day to day activities limited a lot by their disability compared to 6.7% for Camden and 5.7% for London.

8% of residents stated that they provided unpaid care in the 2021 Census, and 4.4% noted they provided over 20 hours per week. This is slightly higher (10% higher) than the Camden average of 7.3% for all unpaid care and significantly higher (29% higher) than the

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Camden average of 3.4% of residents providing over 20 hours of unpaid care.

Gender reassignment

According to the 2021 Census⁴, 1.4% of residents aged 16+ in Regents Park Ward identify as having a different sex or gender to that assigned at birth. This is a higher rate than in Camden (0.8%) and in London (0.9%).

Marriage and civil partnership

The 2021 Census showed the proportion of single family households comprising a married/civil partnership couple in the Euston area is 20%, slightly lower than the borough average of 22.1%. The Euston area has a lower proportion of cohabiting couples (7.8%) compared to the borough average (10.8%), and significantly more (42%) lone parents with dependent children (9.1% compared to 6.4% across the borough).

Pregnancy and maternity

At the time of the Census, the total fertility rate in Camden (total no. children born during a woman's lifetime) was 1.02, this is lower than the London rate of 1.52 and the national rate of 1.62. While recent total fertility rates are not available at the Ward level, 2024 ONS data shows that there were a total of 2011 births in Camden, of which 2.64% were in the Euston area. This compares to an average of 3.7% of births for the other areas which make up Camden.

In 2024, the maternity rate for Camden was 32.8 per 1,000 women aged 15 to 44 years. This is lower than the London rate of 48.2 and the national rate of 48.5. It is also lower than the Inner London rate of 41.2. Maternity data is not available at a lower output level.

Race

Euston has a higher share of residents who identified as 'Asian, Asian British or Asian Welsh' at the 2021 Census (32.1%) than in Camden (18.1%) and London (20.7%). Euston also has a higher share of residents (14.5%) who identified as 'Black, Black British, Black Welsh, Caribbean or African', than in Camden (9%). In Euston, most residents identified as African (11.4%) with only a very small number identifying as Caribbean (1.45). There is a lower share of people who identified as white (40.1%) in this area as compared to Camden (59.5%) and London (53.8%).

The ward has a particularly large proportion of residents who identify as Bangladeshi (18.9%), which is significantly higher than the Camden and London-wide rates of 6.8% and 3.7% respectively.

⁴ This 2021 Census question was voluntary and was only asked of people aged 16 years and over.

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Religion or belief

The 2021 Census found that 29.2% of all Euston residents identified themselves as Christian, slightly less than across the borough (31.4%). It is notable that there is a comparatively large proportion of Muslims in the Euston area (33.3%) compared to the borough average (16.1%). There was a relatively small proportion of Jewish residents in Euston (0.7% compared with the borough average of 4.8%). A further 3.1% of Euston's residents indicated that they had other religions such as Buddhist, Hindu and Sikh. There are fewer people of no religion in the Euston area (24.6%) compared with the borough average (34.6%).

Sex

As of the 2011 Census, 46.3% of all residents living in Euston in 2011 were male, and 53.7% of all residents were female. This discrepancy between the proportion of men and women is also reflected in the borough wide average where 47.3% of all residents are male and 52.7% are female.

Sexual orientation

Euston has a slightly lower percentage (6.6%) of 16+ residents who identify as LGBTQ+ than the Camden average (6.9%). Both the Camden and the Euston percentage are significantly above the average for London as a whole (4.2%). Euston also has a higher share of people (12.4%) who did not answer the sexual orientation census question as compared to Camden (10.5%).

Intersectional Groups

The ONS has published insights into disability prevalence in England and Wales in 2021⁵, broken down by age and sex, with findings presented at country, regional and Local Authority level. In the England and Wales population it is reported that:

- disability increased substantially with age and the highest rates occurred for people aged 65 years and over
- the increase in disability with older ages was associated with an increase among disabled people who were limited a lot
- over age 16 years, females were more likely than males to be disabled

It is likely that these trends will be reflected in the Euston area.

The Bangladeshi population and the Muslim population in the Euston area intersect with 93% of those who identify as Bangladeshi in the 2021 Census also identifying as Muslim. There is also some intersection between those who identify as Black African and those who identify as Muslim, with almost 50% of Africans identifying as Muslim and 39% identifying as Christian.

There is limited reported data for other intersectional groups.

⁵ [Disability by age, sex and deprivation, England and Wales - Office for National Statistics](#)

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

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

Foster carers

There were 65 approved households for foster care in Camden for the year 2023–24⁶. There is no published data for lower output levels in Camden.

Looked after children/care leavers

From November 2023 to November 2024, the number of children in Camden's care grew from 206 to 215. There was a peak in July 2024, when 229 children were in Camden's care. This equates to 57.1 children looked after per 10,000 children under 18 living in Camden. This is an increase of 5.2 since March 2023 (52.3) but continues to be below the national rate and the rate of statistical neighbours.

There is no published data for lower output levels in Camden.

⁶ Data from 'Fostering in England as at 31 March 2024 – underlying data' from [government statistics](#)

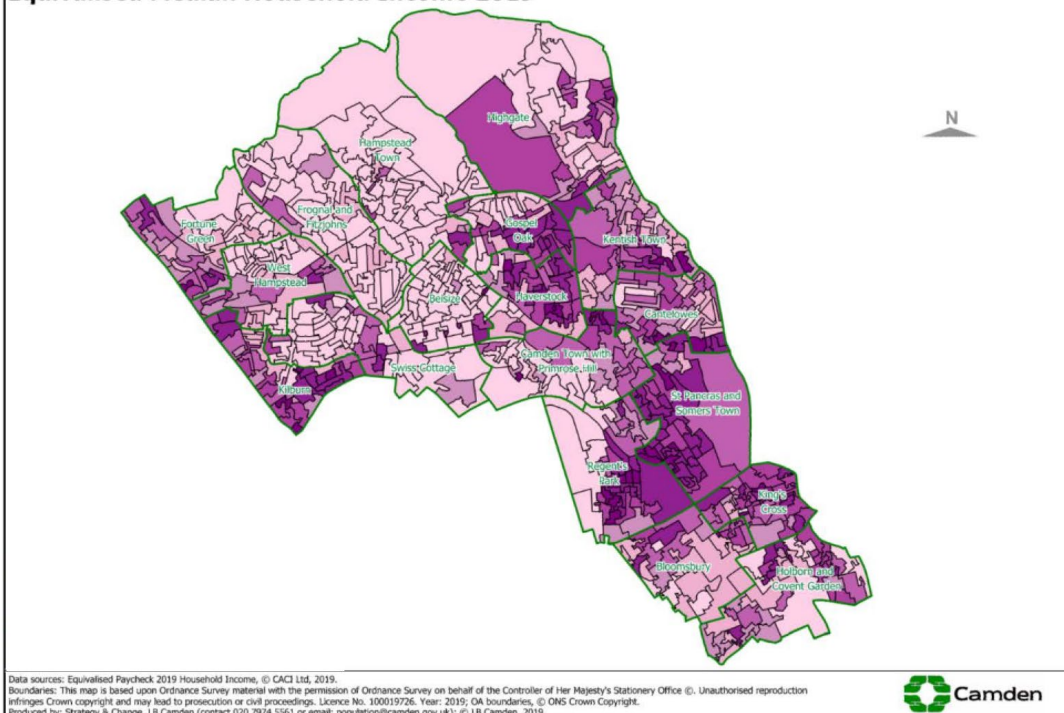
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Low-income households

Estimates of equivalised household income for 2019⁷ show that median gross household income in Camden was £36,053, 17% higher than the London average (£30,700). There are wide differences across Camden wards, ranging from the highest £47,748 in Hampstead Town to the lowest £24,674 in St Pancras and Somers Town ward. St Pancras and Somers Town also ranks lowest for mean household income (£29,371). Median household income in Regent's Park ward falls to the lower portion of the range at £29,323, ranking 17th highest for both median and mean (£35,531) household income.

The map below shows the median household income by Output Area. There is a concentration of households with lower median household incomes in the areas covered by the Euston Area Plan.

Equivalised Median Household Income 2019



Source: Paycheck 2019, © CACI Ltd.

Mean Annual Household Income

£45k & Above	(241)
£40k to £45k	(103)
£35k to £40k	(82)
£30k to £35k	(89)
£25k to £30k	(91)
£20k to £25k	(111)
Under £20k	(32)

⁷ CACI Paycheck provides. Equivalising reflects the notion that, for example, a household of five will need a higher income than a single person living alone to enjoy a comparable standard of living. CACI calculate an 'equivalence value' for households, based on the number and age of household members. Equivalised income is calculated by applying the equivalence value to the Paycheck income data.

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Refugees and asylum seekers

London and Camden are disproportionately impacted by refugee arrivals. In January 2023, Camden Council resolved to achieve Borough of Sanctuary accreditation and was awarded Borough of Sanctuary status in July 2024. As of January 2023, Camden was hosting up to 2,000 individual refugees, asylum seekers and displaced people⁸.

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

The share of Euston households that has dependent children⁹ (28.2%) is significantly higher than the Camden average of 22.7%. Around half of households in Euston with dependent children are couple households, while a smaller share (32%) are households with lone-parents and 17% are multi-family households.

People who are homeless

There have been increases in homelessness and rough sleeping across Camden. In Camden in 2023/24 there were 1084 households assessed as being owed a duty under the Homelessness Reduction Act. This is alongside a significant increase in statutory homelessness presentations between 2022/23 to 2023/24 with an increase from 2,458 to 3,548.

In 2024, there were 603 individuals living in 16 schemes in the Adult Pathway (which is Camden's system of hostels and supported housing). The number of households in temporary accommodation has increased from 498 in 2019 to over 1000 in March 2025. There are significant increases in people sleeping rough on Camden's streets, second only to the London Borough of Westminster. In 2023/24 there were 903 people seen rough sleeping in Camden, compared to 719 in the previous year – with the most significant increase seen in people who had not been seen rough sleeping in the year before (491 people of the 903 seen in 2023/24).

Black, African and Black British and Roma people are more at risk of homelessness as are young people. Of those sleeping rough in Camden, 23.8% of people identify as Black or Black-British in 2023/24.

There is no published data for lower output levels, although it is noted that there are no homeless hostels in the Euston area.

Private rental tenants in deprived areas

In the Euston area, 20.2% of households live in a privately rented home; this is significantly lower than the Camden borough average of 35.6%, and the London average of 30%.

⁸ From report 'Themed Debate – Becoming a Borough of Sanctuary for Refugees and Progress update on the Refugee Programme' dated 23rd January 2023

⁹ The 2021 Census defines a dependent child as a person aged 0 to 15 years in a household, or a person aged 16 to 18 years who is in full-time education and lives in a family with their parent, parents, grandparent or grandparents. It does not include any person aged 16 to 18 years who has a spouse, partner or child living in the household.

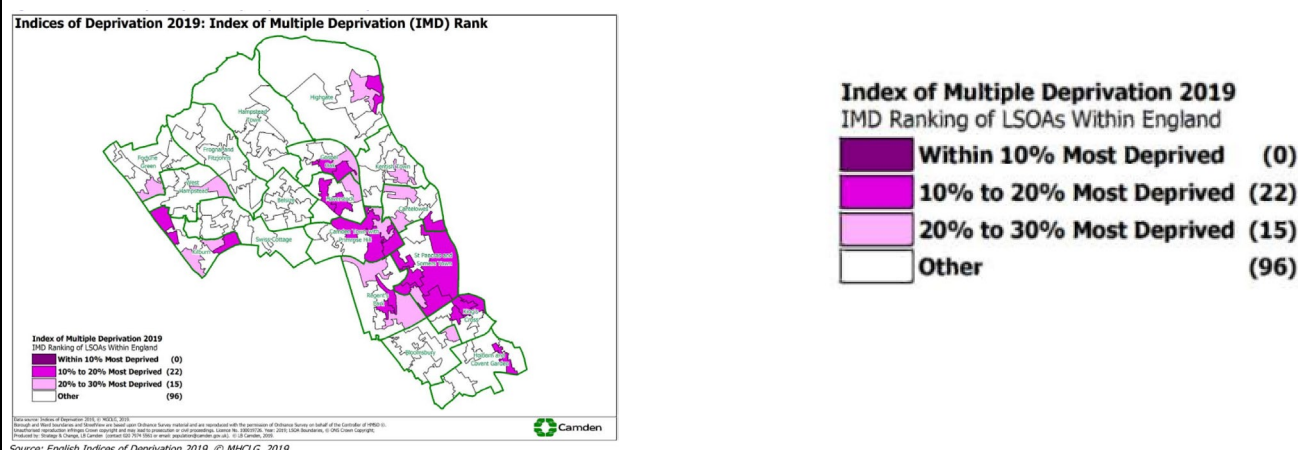
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Deprivation in the 2021 Census is assessed across four areas: education (no one with Level 2 qualifications and no sixteen- to eighteen-year-old full-time students), employment (a non-student unemployed or inactive due to sickness or disability), health (someone in bad health or with a disability), and housing (overcrowded, shared, or lacking central heating).

Around a third of households in the Euston area have households with no dimensions of household deprivation, around sixteen percentage points behind Camden and seventeen percentage points behind London. In the Euston area, 31.2% of households are deprived in two dimension or more, which is significantly higher than the Camden average (20.6%) and the London average (19.1%). In the Euston area, almost 20% of households are classified as overcrowded compared to 9.5% of households in Camden and 11.1% of households in Greater London. The proportion of households in England and Wales which are overcrowded is substantially lower (4.3%).

The Indices of Deprivation 2019¹⁰ allows for the identification of the areas in England with the highest proportion of people and households experiencing deprivation. The data is calculated at LSOA¹¹ level and takes into consideration relative deprivation across seven factors: income, employment, health and disability, education, skills and training, housing and services, and crime and living environment. The indices are provided as both a score and as a rank position within England. The combined overall index is the Index of Multiple Deprivation (IMD) and, with the LSOA geography, is designed to show hotspots of deprivation that are often masked with ward level measures. However, a ward position can be calculated by averaging the IMD scores. By this measure, St Pancras and Somers Town is ranked the most deprived ward in Camden. Parts of this ward fall within the EAP area.

In 2019, the Euston Area Plan area contained 3 LSOAs¹² that fell within the 10-20% most deprived LSOAs in England and 1 that fell within the 20-30% most deprived LSOAs in England. In 2019, Regent's Park's most deprived LSOA was the 2nd most deprived LSOA in Camden and fell within the 13.3% most deprived LSOAs in England.



¹⁰ English Indices of Deprivation 2019, © MHCLG, 2019

¹¹ LSOAs are a statistical geography, smaller than wards. The LSOA areas in the figure above are based on groups of 2011 Census Output Areas (OAs). For the 2011 Census, there were 133 LSOAs in Camden and 32,844 in England. There were 8 LSOAs in St Pancras and Somers Town ward.

¹² The Euston Area Plan area wholly contains some LSOAs but only part contains other LSOAs. Where an LSOA is only partly in the EAP area and more than 50% of the LSOA falls outside the EAP area, the information from the LSOA has not been included in this particular assessment.

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Single parent households

In the Euston area, 17.3% of all households are households with lone parents. This is higher than the Camden average (11.4%) and closer to the London average (13.3%). These figures include lone parent families with both dependent and non-dependent children. The 2021 Census defines a dependent child as a person aged 0 to 15 years in a household, or a person aged 16 to 18 years who is in full-time education who lives with their parent.

Social housing tenants

In the Euston area, 66.9% of all households rent from either the Council (45.8%) or another social rent landlord (21.1%). This is significantly higher than the Camden average (33.7%) and the London average (23.1%). The proportion of households who rent from the Council is also much higher than the Camden average (22.7%).

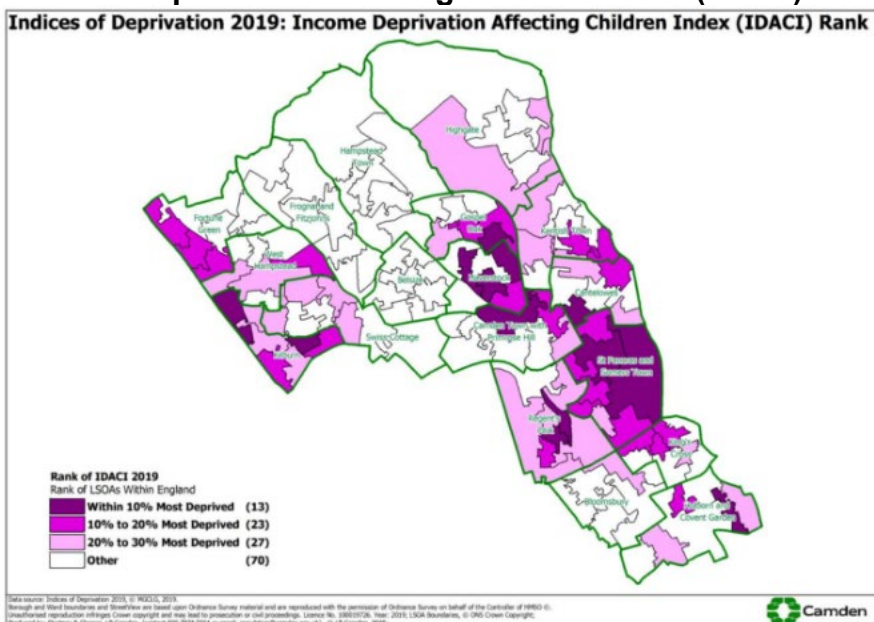
A significant proportion of the housing in the Euston area is comprised of housing blocks located on Council housing estates (including the Regents Park Estate, Amphyll Square Estate, Churchway Estate and Tolmer Square Estate). However not all these properties will provide social housing as there will be a proportion of households who own their property, having purchased the property from the Council. And some of these properties will be privately rented by the leaseholder to other households. The type of accommodation in the Euston area is reflected in the high proportion of households (91.2%) who lived in a purpose-built block of flats or tenement at the time of the 2021 Census. This is significantly higher than the proportion of Camden households who lived in this type of accommodation (56.2%).

Any other, please specify

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

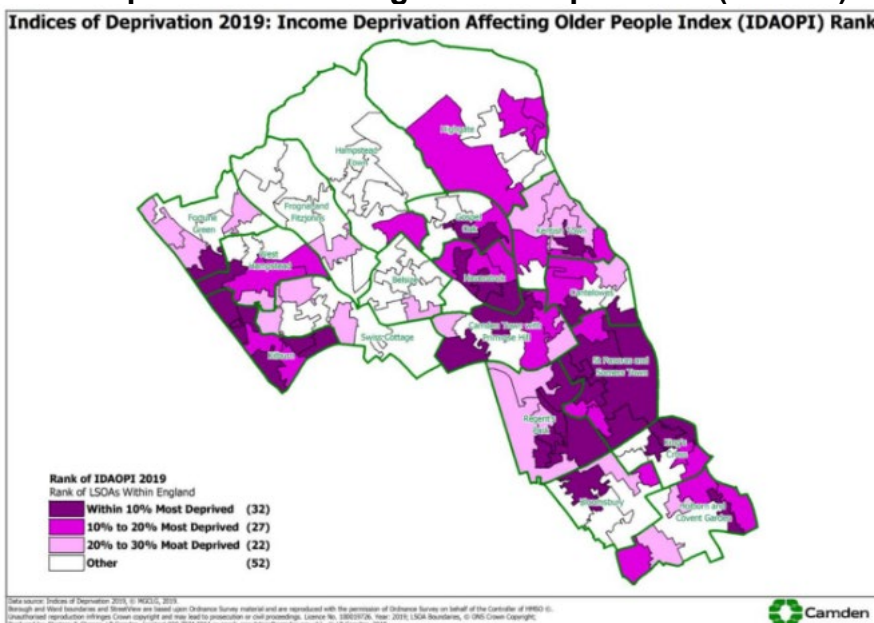
There is evidence of disadvantage for people who have a combination of two or more protected characteristics. The 2019 English Indices of Deprivation measured relative levels of deprivation in England. Age is a protected characteristic under the Equality Act and there is a larger proportion of young people in the Euston area when compared with the average for Camden and London (as set out above). Camden are also concerned about low income households and data from the Indices of Deprivation shows that for the 'income sub-domains', children and older people in the Euston area live in relative income deprivation.

Income Deprivation Affecting Children Index (IDACI) 2019



Source: English Indices of Deprivation 2019, © MHCLG, 2019.

Income Deprivation Affecting Older People Index (IDAOP) 2019



Source: English Indices of Deprivation 2019, © MHCLG, 2019.

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In addition, within Euston, there is a lower proportion of residents aged 20-24 and 25-34 that are economically active than compared to London, and England averages.

Data is available for household reference persons¹³ by ethnicity and type of housing. A large proportion of household reference persons who identify as Bangladeshi ¹⁴ (85%) and Black African (86%) in the Euston area live in social housing according to data from the 2021 Census. A smaller percentage of household reference persons who identify as "White" (63.3%) in this area live in social housing.

¹³ A "Household Reference Person" is the householder, who is the household member who owns the accommodation or is legally responsible for the rent

¹⁴ Census 2021 data set estimates that classify Household Reference Persons in England and Wales by tenure and by ethnic group.

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Step 3: Impact

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

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

- **Potential negative impact on protected characteristics**

<i>Protected Characteristic</i>	<i>Is there potential negative impact? (Yes or No)</i>	<i>Explain the potential negative impact</i>
Age	No	The EAP 2025 includes policies and site allocations for a significant amount of development with the majority expected to be accommodated above the station and tracks. The 1,700 to 2,100 new homes and 216,000sqm to 368,000sqm of new employment floorspace that the plan seeks to deliver will generate environmental conditions (noise, dust etc.) that could present negative health impacts for people of all ages. The age groups most vulnerable to air quality impacts are the young and the elderly ¹⁵ . However, given the mitigation to minimise air quality impacts that would be secured through various policies including Local Plan policies (examples being Construction Management Plans, Camden Clean Air Strategy 2019-2034 and Camden Clean Air Action Plan 2022-2026, Euston Road Air Quality Focus Area, Euston Healthy Streets and Submission Draft Local Plan ‘Policy A3 – Air quality’ which requires development to achieve air quality neutral and encourages the adoption an air quality positive approach) there would be an overall positive impact on air quality. This would be further enhanced by ‘Strategic Principle EAP 5: Open space and green infrastructure’ which seeks an enhanced green infrastructure network as well as the statutory requirement for biodiversity net gain.

¹⁵ ‘Impacts of air pollution across the life course – evidence highlight note’ – Imperial College London Environmental Research Group April 2023

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<i>Protected Characteristic</i>	<i>Is there potential negative impact? (Yes or No)</i>	<i>Explain the potential negative impact</i>
Disability including carers	No	The EAP 2025 includes policies and site allocations for a significant amount of development with the majority expected to be accommodated above the station and tracks. The 1,700 to 2,100 new homes and 216,000sqm to 368,000sqm of new employment floorspace that the plan seeks to deliver will generate environmental conditions (noise, dust etc.) that could present negative health impacts for people with disabilities and other pre-existing medical conditions ¹⁶ . However, given the mitigation to minimise air quality impacts that would be secured through various policies including Local Plan policies (examples being Construction Management Plans, Camden Clean Air Strategy 2019-2034 and Camden Clean Air Action Plan 2022-2026, Euston Road Air Quality Focus Area, Euston Healthy Streets and Submission Draft Local Plan 'Policy A3 – Air quality' which requires development to achieve air quality neutral and encourages the adoption an air quality positive approach) there would be an overall positive impact on air quality. This would be further enhanced by 'Strategic Principle EAP 5: Open space and green infrastructure' which seeks an enhanced green infrastructure network as well as the statutory requirement for biodiversity net gain.
Gender reassignment		The EAP 2025 is not expected to have a negative impact in relation to this protected group.
Marriage/civil partnership		The EAP 2025 is not expected to have a negative impact in relation to this protected group.

¹⁶ [Relationship Between Disabilities and Air Quality | SpringerLink](#)

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<i>Protected Characteristic</i>	<i>Is there potential negative impact? (Yes or No)</i>	<i>Explain the potential negative impact</i>
Pregnancy/ maternity		The EAP 2025 is not expected to have a negative impact in relation to this protected group.
Race		The EAP 2025 is not expected to have a negative impact in relation to this protected group.
Religion or belief		The EAP 2025 is not expected to have a negative impact in relation to this protected group.
Sex		The EAP 2025 is not expected to have a negative impact in relation to this protected group.
Sexual orientation		The EAP 2025 is not expected to have a negative impact in relation to this protected group.

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- Potential positive impact on protected characteristics**

<i>Protected Characteristic</i>	<i>Is there potential positive impact? (Yes or No)</i>	<i>Explain the potential positive impact</i>
Age	Yes	<p>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. Development is expected to 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 but the impact would particularly benefit young people due to their disproportionate presence in this area.</p> <p>The Euston area has lower-than-average educational attainment. The proposed update to the EAP includes requirements for all major development to sign up to and deliver on the objectives of the Euston Social Value Charter (including regular monitoring). The charter is focused on supporting social, economic and environmental improvements to benefit local communities and residents. Employers who establish in Euston will be expected to take guidance from the recommendations of the report of the Camden STEAM (Science, Technology, Engineering, Arts and Maths) Commission to provide meaningful skills development and work opportunities for young people. Development will be expected to deliver a coordinated programme of creative, digital and scientific learning specifically drawing on the organisations in Euston and the needs of the area's children and youth.</p> <p>In addition, proposals for development plots within the masterplan will be expected to be supported by a comprehensive Employment, Learning and Training Strategy to be agreed with the Council. During the operational and construction stage, it is expected that long-term commitments will be made to the following:</p> <ul style="list-style-type: none"> • Provision of job and training opportunities in the creative, digital and scientific sectors for young people from underrepresented backgrounds; • Provision of apprenticeships and locally targeted

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		<p>recruitment;</p> <ul style="list-style-type: none"> • Delivering education, skills and training programmes for local schools and the local community to increase the knowledge of and interest in science and support careers in these fields. <p>Development proposals are expected to provide space that meets the needs of children and young people of all ages – play areas for younger children and safe, functional social spaces for young men and women. Development should deliver space for young people that they know is their own and engenders a sense of belonging. In order to achieve this, proposals must set out a plan for co-designing spaces with local young people.</p> <p>There are concerns around youth safety in the Euston area. To address these concerns, new development at Euston is expected to play an active role in developing long-term strategies to ensure that in both design and management, streets and spaces are safe and enjoyable to use. Development proposals are expected to take guidance from the recommendations of the Youth Safety Task Force to develop youth facilities and programmes that reach young people during and outside of school hours. Development is also expected to provide space that meets the needs of children and young people of all ages – play areas for younger children and safe, functional social spaces for young men and women.</p> <p>Given all of the above, the EAP Update is considered to have a positive effect on young people.</p> <p>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. Development will also be expected to support existing organisations serving older adults in Camden and consider promoting intergenerational programming.</p> <p>Strategic Principle EAP 3: Transport includes the principle of delivering an inclusive transport system and streets that are accessible to all. Euston Road, Hampstead Road, Eversholt Street and surrounding residential streets would be upgraded as part of the Euston Healthy Street project. The Healthy Streets</p>
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		<p>framework has been developed by the Mayor and focuses on public health outcomes and the human experience. The experience of being on Euston's streets is particularly important for older people and the very young, who disproportionately feel the negative impacts of living in a car-dependent city. The Healthy Streets framework is expected to underpin and inform all transport and place making proposals developed on streets and the public realm in and around Euston to ensure streets in Euston are delivering positive, public health outcomes.</p> <p>The EAP 2025 includes policies and site allocations for a significant number of new homes. This proposed update to the EAP 2015 acknowledges the reduction in land available for development which means less housing is expected to be delivered when compared with the delivery figures set out in the 2015 EAP. In accordance with the Local Plan 2017 Policy H6 and Submission Draft Local Plan 2025 Policy H8, a proportion of housing and affordable housing in the largest housing developments (0.5ha or greater) would be expected to make provision for particular housing needs. For such sites, the Council may support the inclusion of housing / affordable housing for older people including people with care or support requirements. The provision of such housing would be beneficial for older people living in Camden.</p> <p>The updates to the EAP are considered to have the potential to promote equality of opportunity and to foster good relations between different groups in the community.</p>
<i>Protected Characteristic</i>	<i>Is there potential positive impact? (Yes or No)</i>	<i>Explain the potential positive impact</i>
Disability including carers	Yes	<p>The EAP 2025 includes policies and site allocations for a significant number of new homes, including affordable housing. This proposed update to the EAP 2015 acknowledges the reduction in land available for development which means less housing is expected to be delivered when compared with the delivery figures set out in the EAP 2015. In accordance with the Local Plan 2017 Policy H6 and Submission Draft Local Plan 2025 Policy D3, 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 increase the overall availability of accessible homes to those with disabilities.</p> <p>Proposals for development plots within the masterplan</p>

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	<p>would be expected to be supported by a comprehensive Employment, Learning and Training Strategy to be agreed with the Council. In order to promote inclusive growth during construction and operational stages, the EAP encourages the ELT strategy to include pathways to employment for those with Special Educational Needs and Disability (SEND) and long-term health conditions. This would help to advance equality of opportunity for people with disabilities in Camden.</p> <p>Strategic Principle EAP 3: Transport includes the principle of delivering an inclusive transport system and streets that are accessible to all. Euston Road, Hampstead Road, Eversholt Street and surrounding residential streets would be upgraded as part of the Euston Healthy Street project. The Healthy Streets framework has been developed by the Mayor and focuses on public health outcomes and the human experience. The experience of being on Euston's streets is particularly important for disabled people, who disproportionately feel the negative impacts of living in a car-dependent city. The Healthy Streets framework is expected to underpin and inform all transport and place making proposals developed on streets and the public realm in and around Euston to ensure streets in Euston are delivering positive, public health outcomes. Walking and cycling are important for disabled people, who – with the help of improved walking and cycling environments, consideration for wheelchair use and adapted cycles and more accessible public transport – can realise the health benefits active travel can provide.</p> <p>A key objective of the EAP is to deliver new car free east-west links across the station and tracks. This would help to address the barriers to movement caused by the existing station infrastructure. New and enhanced infrastructure would be expected to include wide, accessible pavements, physically segregated cycle infrastructure, improved crossings and junction safety measures. The new routes and enhanced infrastructure would be beneficial for those with disabilities.</p> <p>The EAP recognises that the redevelopment of Euston Station provides an opportunity to review and upgrade the existing bus facilities at Euston. The EAP sets out requirements for a future bus facility. These include a requirement for an intuitive and accessible and legible layout off the highway that meets the needs of bus passengers and which allows for easy interchange between bus routes and with other modes of transport.</p>
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		<p>It also requires improved accessibility for users with reduced mobility, or other disabilities, by providing convenient, close, step-free access between trains and buses. Given that disabled people are more likely to travel by bus, an improved bus facility would be beneficial for this protected group.</p> <p>The delivery of the new Moorfields Eye Hospital site near King's Cross may see more visually impaired patients using Euston. The RNIB also has an office south of Euston Road in Bloomsbury. The EAP Update expects designs for the new stations and new development and wayfinding should be accessibility audited with input from disabled people including visually impaired people.</p>
Protected Characteristic	Is there potential positive impact? (Yes or No)	Explain the potential positive impact
Gender reassignment	Yes	<p>The EAP 2025 includes policies and site allocations for a significant number of new homes and jobs. This proposed update to the EAP 2015 acknowledges the reduction in land available for development which means less housing and employment floorspace is expected to be delivered when compared with the delivery figures set out in the 2015 EAP. Nevertheless, the increase in homes (including affordable housing) and jobs would be of benefit to all people in Camden including this protected group.</p>
Marriage/civil partnership	Yes	<p>The EAP 2025 includes policies and site allocations for a significant number of new homes and jobs. This proposed update to the EAP 2015 acknowledges the reduction in land available for development which means less housing and employment floorspace is expected to be delivered when compared with the delivery figures set out in the 2015 EAP. Nevertheless, the increase in homes (including affordable housing) and jobs would be of benefit to all people in Camden including this protected group.</p>
Pregnancy/maternity	Yes	<p>The EAP 2025 includes policies and site allocations for a significant number of new homes and jobs. This proposed update to the EAP 2015 acknowledges the reduction in land available for development which means less housing and employment floorspace is expected to be delivered when compared with the delivery figures set out in the 2015 EAP. Nevertheless, the increase in homes (including affordable housing) and jobs would be of benefit to all people in Camden including this protected group.</p>

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		A key objective of the EAP is to deliver new car free east-west links across the station and tracks. This would help to address the barriers to movement caused by the existing station infrastructure. New and enhanced infrastructure would be expected to include wide, accessible pavements, improved crossings and junction safety measures. The new routes and enhanced infrastructure would be beneficial for those with push chairs and prams.
Protected Characteristic	Is there potential positive impact? (Yes or No)	Explain the potential positive impact
Race	Yes	<p>The EAP 2025 includes policies and site allocations for a significant amount of employment floorspace. This proposed update to the EAP 2015 acknowledges the reduction in land available for development which means less employment floorspace is expected to be delivered when compared with the delivery figures set out in the 2015 EAP.</p> <p>Additional commercial floorspace, is likely to 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 and absence of measures to reduce recruitment bias. Ethnic minorities tend to have disproportionate challenges accessing employment because of these factors.</p> <p>Black and Minority Ethnic groups account for a disproportionately high share of London's working age population who are not in paid work. In London, 39.5% of those who are Pakistani/Bangladeshi are not in paid work. Similarly, 36.9% of Black Londoners are not in paid work. These figures are significantly higher than the proportion (20.7%) of White Londoners who are not in paid work¹⁷.</p> <p>The Euston area has a comparatively high proportion of residents from Black and Minority Ethnic groups (52.4% of residents compared to a borough average of 33.7%). The largest minority groups in the study area are Bangladeshi (18.9%) and Black African (11.4%). Employment seekers from these groups could</p>

¹⁷ [Worklessness by ethnicity group | Trust for London](#)

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		<p>potentially benefit from the increase in jobs in the EAP area. Moreover, the EAP Update has an increased focus on ensuring local communities benefit from future development and proposals for development plots within the masterplan would be expected to be supported by a comprehensive Employment, Learning and Training Strategy with long-term commitments to the following:</p> <ul style="list-style-type: none"> • Provision of job and training opportunities in the creative, digital and scientific sectors for young people from underrepresented backgrounds; • Provision of apprenticeships and locally targeted recruitment; • Delivering education, skills and training programmes for local schools and the local community to increase the knowledge of and interest in science and support careers in these fields
<i>Protected Characteristic</i>	<i>Is there potential positive impact? (Yes or No)</i>	<i>Explain the potential positive impact</i>
Religion or belief	Yes	<p>There is a comparatively large proportion of Muslims in the Euston area (33.3%). This reflects the large Bangladeshi community in the Euston area as there is an identified intersection between these two protected groups.</p> <p><u>England and Wales</u></p> <p>ONS data from the 2021 Census¹⁸ for England and Wales shows that people identified as "Muslim" had the lowest percentage of people aged 16 to 64 years in employment, 51.4%, compared with 70.9% of the overall population. The next lowest percentage, 64.2%, was among people who reported "Other religion". The age profile of the population often affects employment estimates, with younger populations tending to have higher employment levels. Those who identified as "Muslim" had the highest proportion aged between 16 and 29 years (32.1%)¹⁹. However, by age, this group had consistently lower percentages in employment than the general population. Among people aged 20 to 24 years, the highest unemployment was among people who identified as "Muslim" (13.0%), followed by those who reported "Other religion" (12.6%), compared with the overall population in that age group (9.0%). There might be other factors driving employment levels, such as the Muslim group having the lowest percentage in employment among females (37.0%),</p>

¹⁸ Office for National Statistics (ONS), released 24 March 2023, ONS website, article, [Religion by housing, health, employment, and education, England and Wales: Census 2021](#)

¹⁹ [Diversity in the labour market, England and Wales - Office for National Statistics](#) Release date: 25 September 2023

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		<p>whereas the percentage for males (59.9%) was more like that seen in the general population. Levels of economic inactivity because of looking after family or home were higher among Muslim females (27.3%) than across all females (7.8%). Males (12.4%) and females (13.2%) who identified as "Muslim" were twice as likely to be economically inactive because of being a student than all adults (5.7% male, 5.6% female).</p> <p>Additional commercial floorspace, is likely to 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. People who identify as Muslim tend to have disproportionate challenges accessing employment because of these factors.</p> <p>In addition, the EAP Update has an increased focus on ensuring local communities benefit from future development and proposals for development plots within the masterplan would be expected to be supported by a comprehensive Employment, Learning and Training Strategy (ELTS) with long-term commitments to the following:</p> <ul style="list-style-type: none"> • Provision of job and training opportunities in the creative, digital and scientific sectors for young people from underrepresented backgrounds; • Provision of apprenticeships and locally targeted recruitment; • Delivering education, skills and training programmes for local schools and the local community to increase the knowledge of and interest in science and support careers in these fields; <p>The delivery of an ELTS would particularly benefit Muslims who are disadvantaged in the jobs market.</p>
<i>Protected Characteristic</i>	<i>Is there potential positive impact? (Yes or No)</i>	<i>Explain the potential positive impact</i>
Sex	Yes	<p>ONS Census data from 2021 for England and Wales shows that by sex, females had a lower percentage in employment (53.2%) compared with males (61.4%) and with a corresponding higher percentage who were economically inactive (43.8%) compared with males (34.7%). People are defined as inactive if they were recorded as being one of the following:</p>

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		<ul style="list-style-type: none"> • retired • studying • looking after home or family • long-term sick or disabled • another reason <p>At the UK level, 25.0% of women aged 16–64 were economically inactive in October to December 2024 (compared to 18% of men)²⁰. Of these 26%²¹ were economically inactive in October to December 2024 because they were looking after their family or home. This compares to 6% of men who were economically inactive over the same period because they were looking after their family or home.</p> <p>In the Euston area there was a higher proportion of usual residents who worked part time (35.8%) than the Camden average (26.3%) or the Greater London average (28%).</p> <p>Women from minority ethnic groups have a higher unemployment rate than men²².</p> <p>Additional commercial floorspace, is likely to 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 include family requirements and the need for flexible and/or part-time work. Women tend to have disproportionate challenges accessing employment because of these factors.</p> <p>The proposed update to the EAP includes requirements for all major development to sign up to and deliver on the objectives of the Euston Social Value Charter. In order to provide good work for local residents, future employers will be encouraged to adopt Timewise and address flexibility and diversity in the workforce including designing flexible roles that suit a wide range of employees. Delivering on the objectives of the Euston Social Value Charter should therefore be positive for the employment options for women who are looking after home and family.</p>
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²⁰ [Women and the UK economy - House of Commons Library](#) - 28 February 2025

²¹ [INAC01 SA: Economic inactivity by reason \(seasonally adjusted\) - Office for National Statistics](#) - Release date: 12 August 2025

²² [Women and the UK economy - House of Commons Library](#) - 28 February 2025

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<i>Protected Characteristic</i>	<i>Is there potential positive impact? (Yes or No)</i>	<i>Explain the potential positive impact</i>
Sexual orientation	Yes	<p>ONS data from the 2021 Census²³ for England and Wales shows that adults who said they were lesbian, gay, bisexual or another minority sexual orientation (LGB+) had a higher percentage in employment (63.8%) than straight or heterosexual adults (57.8%).</p> <p>The EAP 2025 includes policies and site allocations for a significant number of new homes and jobs. This proposed update to the EAP 2015 acknowledges the reduction in land available for development which means less housing and employment floorspace is expected to be delivered when compared with the delivery figures set out in the 2015 EAP. Nevertheless, the increase in homes (including affordable housing) and jobs would be of benefit to all people in Camden including this protected group.</p>

²³ [Diversity in the labour market, England and Wales - Office for National Statistics](#) Release date: 25 September 2023

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- Potential negative impact on other characteristics**

Characteristic	Is there potential negative impact? (Yes or No)	Explain the potential negative impact
Foster carers	No	The EAP 2025 is not expected to have a negative impact in relation to this protected group.
Looked after children/care leavers	No	The EAP 2025 is not expected to have a negative impact in relation to this protected group.
Low-income households	No	The EAP 2025 is not expected to have a negative impact in relation to this protected group.
Refugees and asylum seekers	No	The EAP 2025 is not expected to have a negative impact in relation to this protected group.
Parents (of any gender, with children aged under 18)	No	The EAP 2025 is not expected to have a negative impact in relation to this protected group.
People who are homeless	No	The EAP 2025 is not expected to have a negative impact in relation to this protected group.
Private rental tenants in deprived areas	No	The EAP 2025 is not expected to have a negative impact in relation to this protected group.
Single parent households	No	The EAP 2025 is not expected to have a negative impact in relation to this protected group.
Social housing tenants	No	The EAP 2025 is not expected to have a negative impact in relation to this protected group.
Any other, please specify	N/A	N/A

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- Potential positive impact on other characteristics**

Characteristic	Is there potential positive impact? (Yes or No)	Explain the potential positive impact
Foster carers	Yes	<p>A key objective of the EAP is to deliver new car free east-west links across the station and tracks. This would help to address the barriers to movement caused by the existing station infrastructure. New and enhanced infrastructure would be expected to include wide, accessible pavements, improved crossings and junction safety measures. The new routes and enhanced infrastructure would be of particular benefit for those foster carers with prams and push chairs.</p> <p>Development proposals are expected to provide space that meets the needs of children and young people of all ages – play areas for younger children and safe, functional social spaces for young men and women. Development should deliver space for young people that they know is their own and engenders a sense of belonging. In order to achieve this, proposals must set out a plan for co-designing spaces with local young people.</p>
Looked after children/care leavers	Yes	<p>The EAP 2025 includes policies and site allocations for a significant number of new homes. This proposed update to the EAP 2015 acknowledges the reduction in land available for development which means less housing is expected to be delivered when compared with the delivery figures set out in the 2015 EAP. In accordance with the Local Plan 2017 Policy H6 and Policy H8 and Submission Draft Local Plan 2025 Policy H8, a proportion of housing and affordable housing in the largest housing developments (0.5ha or greater) would be expected to make provision for particular housing needs. For such sites, the Council may support the inclusion of housing for vulnerable people such as looked-after children/young people leaving care. The delivery of such housing would be positive for this particular group.</p> <p>Development proposals are expected to provide space that meets the needs of children and young people of all ages – play areas for younger children and safe, functional social spaces for young men and women. Development should deliver space for young people that they know is their own and engenders a sense of belonging. In order to achieve this, proposals must set</p>

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		<p>out a plan for co-designing spaces with local young people. Play areas for children and social spaces for young people would be of benefit to looked after children/care leavers.</p>
Low-income households	Yes	<p>The EAP 2025 includes policies and site allocations for a significant number of new homes and jobs. This proposed update to the EAP 2015 acknowledges the reduction in land available for development which means less housing and employment floorspace is expected to be delivered when compared with the delivery figures set out in the 2015 EAP. Nevertheless, the increase in homes and jobs would be of benefit to all people in Camden including low income households, particularly as a proportion of these homes would be affordable housing. The Council will seek types of affordable housing and rents that are appropriate in the context of the high house prices and market rents in the Euston area, the incomes and size of households in need of affordable housing, particularly the need for affordable family housing and the demand for intermediate housing in the area.</p> <p>In addition, the EAP Update has an increased focus on ensuring local communities benefit from future development and proposals for development plots within the masterplan would be expected to be supported by a comprehensive Employment, Learning and Training Strategy (ELTS) with long-term commitments to the following:</p> <ul style="list-style-type: none"> • Provision of apprenticeships and locally targeted recruitment; • Delivering education, skills and training programmes for local schools and the local community to increase the knowledge of and interest in science and support careers in these fields; <p>The benefits delivered by the ELTS have the potential to be positive for low income households in the Euston area.</p> <p>Strategic Principle EAP 3: Transport includes the principle of delivering an inclusive transport system and streets that are accessible to all. Euston Road, Hampstead Road, Eversholt Street and surrounding residential streets would be upgraded as part of the Euston Healthy Street project. The Healthy Streets framework has been developed by the Mayor and focuses on public health outcomes and the human experience. The experience of being on Euston's streets is particularly important for those living on lower incomes, who disproportionately feel the negative</p>

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		<p>impacts of living in a car-dependent city. The Healthy Streets framework is expected to underpin and inform all transport and place making proposals developed on streets and the public realm in and around Euston to ensure streets in Euston are delivering positive, public health outcomes.</p> <p>Development proposals are expected to provide space that meets the needs of children and young people of all ages – play areas for younger children and safe, functional social spaces for young men and women. Development should deliver space for young people that they know is their own and engenders a sense of belonging. In order to achieve this, proposals must set out a plan for co-designing spaces with local young people. Play areas for children and social spaces for young people would be positive for those living in low-income households.</p>
Refugees and asylum seekers	Yes	<p>The EAP 2025 includes policies and site allocations for a significant number of new homes. This proposed update to the EAP 2015 acknowledges the reduction in land available for development which means less housing is expected to be delivered when compared with the delivery figures set out in the 2015 EAP. In accordance with the Local Plan 2017 Policy H6 and Policy H8 and Submission Draft Local Plan 2025 Policy H8, a proportion of housing and affordable housing in the largest housing developments (0.5ha or greater) would be expected to make provision for particular housing needs. With regards to supporting the housing needs of children and young people, the supporting text of the policy recognises that one of the challenges the Council needs to respond to is the fact that a high proportion of Camden's housing need at the borough level is for unaccompanied children who are asylum seekers, often with complex emotional needs related to trauma and loss. The EAP could therefore potentially benefit this group of people.</p>

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<p>Parents (of any gender, with children aged under 18)</p>		<p>The EAP 2025 includes policies and site allocations for a significant number of new homes and jobs. This proposed update to the EAP 2015 acknowledges the reduction in land available for development which means less housing and employment floorspace is expected to be delivered when compared with the delivery figures set out in the 2015 EAP. Nevertheless, the increase in homes and jobs would be of benefit to all people in Camden including parents with children aged under 18.</p> <p>Development proposals are expected to provide space that meets the needs of children and young people of all ages – play areas for younger children and safe, functional social spaces for young men and women. Development should deliver space for young people that they know is their own and engenders a sense of belonging. In order to achieve this, proposals must set out a plan for co-designing spaces with local young people. Play areas for children and social spaces for young people would be positive for those parents with children under 18.</p>
<p>People who are homeless</p>		<p>The EAP 2025 includes policies and site allocations for a considerable number of new homes, a significant proportion of which would be delivered as affordable housing. This proposed update to the EAP 2015 acknowledges the reduction in land available for development which means less housing is expected to be delivered when compared with the delivery figures set out in the 2015 EAP. Nevertheless, the provision of a significant number of affordable homes for those in housing need is likely to be positive for people who are homeless.</p>

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Characteristic	Is there potential positive impact? (Yes or No)	Explain the potential positive impact
Private rental tenants in deprived areas		<p>Deprivation in the 2021 Census is assessed across four areas: education, employment, health and housing.</p> <p>The EAP 2025 includes policies and site allocations for a considerable number of new homes, a significant proportion of which would be delivered as affordable housing. This proposed update to the EAP 2015 acknowledges the reduction in land available for development which means less housing is expected to be delivered when compared with the delivery figures set out in the 2015 EAP. Nevertheless, the provision of a significant number of affordable homes is likely to be positive for private rental tenants in deprived areas. The Council will seek types of affordable housing and rents that are appropriate in the context of the high house prices and market rents in the Euston area, the incomes and size of households in need of affordable housing, particularly the need for affordable family housing and the demand for intermediate housing in the area. This will help to address deprivation in terms of those household's whose accommodation is either overcrowded or in a shared dwelling.</p> <p>The level of growth identified for the Euston area provides an opportunity to address existing issues in terms of education and unemployment around Euston. It is important to ensure that local people are able to take advantage of potential future economic and employment opportunities at Euston. Development proposals above and around Euston Station and its environs are expected to include measures to enable local people to access employment opportunities. Development proposals are expected to provide an Employment, Learning and Training Strategy at an early stage in the development of any proposal for Euston. Providing opportunities for local residents in terms of employment and education will help to address deprivation and social exclusion in the local area.</p> <p>In addition, the proposed update to the EAP includes requirements for all major development to sign up to and deliver on the objectives of the Euston Social Value Charter. The charter is focused on supporting social, economic and environmental improvements to benefit local communities and residents. These improvements will help to address the existing levels of deprivation identified in the Euston area.</p>

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		<p>Significant parts of the Euston area perform poorly in relation to health deprivation and disability. In combination with the Local Plan and other planning guidance, the policies in the EAP Update aim to engender 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. Major development proposals will be required to include a Health Impact Assessment and will need to demonstrate how they have considered 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>
Single parent households		<p>The EAP 2025 includes policies and site allocations for a considerable number of new homes, a significant proportion of which would be delivered as affordable housing. This proposed update to the EAP 2015 acknowledges the reduction in land available for development which means less housing is expected to be delivered when compared with the delivery figures set out in the 2015 EAP. Nevertheless, the provision of a significant number of affordable homes is likely to be positive for single parent households. The Council will seek types of affordable housing and rents that are appropriate in the context of the high house prices and market rents in the Euston area, the incomes and size of households in need of affordable housing, particularly the need for affordable family housing and the demand for intermediate housing in the area.</p> <p>Single parent households are substantially more likely than other parents and the rest of the working-age population to be in low pay and, among those on low pay, are less likely to progress at work²⁴. Five interconnected barriers limit the ability of single parents to progress: working part-time; a lack of flexibility; the availability and affordability of childcare; the relationship between education and job roles; and time out of the labour market²⁵.</p> <p>The proposed update to the EAP includes requirements for all major development to sign up to and deliver on the objectives of the Euston Social Value Charter. In order to provide good work for local residents, future employers will be encouraged to adopt Timewise and</p>

²⁴ [Held Back: Single parents and in work progression in London | Gingerbread](#)

²⁵ [Held Back: Single parents and in work progression in London | Gingerbread](#)

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		address flexibility and diversity in the workforce including designing flexible roles that suit a wide range of employees. Delivering on the objectives of the Euston Social Value Charter should therefore be positive for the employment options for single parents.
Social housing tenants		<p>In the Euston area, almost 20% of households are classified as overcrowded and 66.9% of all households rent from either the Council (45.8%) or another social rent landlord (21.1%).</p> <p>The EAP 2025 includes policies and site allocations for a considerable number of new homes, a significant proportion of which would be delivered as affordable housing. This proposed update to the EAP 2015 acknowledges the reduction in land available for development which means less housing is expected to be delivered when compared with the delivery figures set out in the 2015 EAP. Nevertheless, the provision of a significant number of affordable homes is likely to be positive for existing social housing tenants. Especially as the Local Plan policy gives priority to large homes (with three or more bedrooms) for social-rent homes. Camden Planning Guidance on housing (2021) indicates that the Council will aim for at least 50% of low-cost rented dwellings in each scheme to be large homes (3 bedrooms or more).</p>
Any other, please specify		

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

Many people in the Euston area have a combination of two or more protected characteristics (age, race, religion and disability) as well as having one or more of the additional characteristics (low-income households, parents with children under 18, lone parent households and social housing tenants).

The EAP Update 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 and those with the additional characteristics is likely to be positive or neutral at worse. Likewise, the impact on those who have a combination of protected or additional characteristics is likely to be positive. Some key examples are set out below.

The EAP 2025 includes policies and site allocations for a considerable number of new homes, a significant proportion of which would be delivered as affordable housing. This proposed update to the EAP 2015 acknowledges the reduction in land available for development which means less housing is expected to be delivered when compared with the delivery figures set out in the 2015 EAP. Nevertheless, the provision of a significant number of affordable homes is likely to be positive for existing social housing tenants. The large proportion of Council housing and other socially rented housing in the Euston area is reflected by the significant proportions of Euston households that live in social housing. In the Euston area, 66.9% of all households rent from either the Council (45.8%) or another social rent landlord (21.1%). A large proportion of household reference persons who identify as Bangladeshi (85%) and Black African (86%) in the Euston area live in social housing according to data from the 2021 Census. In addition, in terms of household ethnicity there is a far higher proportion of overcrowding in Bangladeshi and Black African households (63% of all Bangladeshi households and 58% of Black African households), compared to the overall rate of overcrowding in the Euston area (20% of all households).

Therefore, the delivery of a significant number of new affordable homes would be beneficial to both Black African households (Muslim and Christian) and Bangladeshi, Muslim households who live in overcrowded social rented homes. Especially as the Local Plan policy gives particular priority to large homes (with three or more bedrooms) for social-rent homes. Camden Planning Guidance on housing (2021) indicates that the Council will aim for at least 50% of low-cost rented dwellings in each scheme to be large homes (3 bedrooms or more).

The EAP 2025 includes policies and site allocations for a significant amount of employment floorspace. This proposed update to the EAP 2015 acknowledges the reduction in land available for development which means less employment floorspace is expected to be delivered when compared with the delivery figures set out in the 2015 EAP. Additional commercial floorspace, is likely to 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; and absence of measures to reduce recruitment bias. Ethnic minorities, Muslims, women, lone parents, and people with disabilities tend to have disproportionate

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challenges accessing employment because of these factors.

Employment seekers from these groups including those with a combination of protected or additional characteristics could potentially benefit from the increase in jobs in the EAP area. For example, Black African young people and Bangladeshi Muslim women may be able to benefit from the increase in jobs in the EAP area and the particular measures included in the EAP to address deprivation and the focus on development proposals creating social value

For example. The EAP Update has an increased focus on ensuring local communities benefit from future development and proposals for development plots within the masterplan would be expected to be supported by a comprehensive Employment, Learning and Training Strategy with long-term commitments to the following:

- Provision of job and training opportunities in the creative, digital and scientific sectors for young people from underrepresented backgrounds;
- Provision of apprenticeships and locally targeted recruitment;
- Delivering education, skills and training programmes for local schools and the local community to increase the knowledge of and interest in science and support careers in these fields

The proposed update to the EAP includes requirements for all major development to sign up to and deliver on the objectives of the Euston Social Value Charter (ESCV). In order to provide good work for local residents, future employers will be encouraged to adopt Timewise and address flexibility and diversity in the workforce including designing flexible roles that suit a wide range of employees. Delivering on the objectives of the ESCV should therefore be positive for the employment options for all women who are looking after home and family. However, levels of economic inactivity because of looking after family or home were higher among Muslim females than across all females so the ESCV has the potential to be particularly beneficial for Bangladeshi and Black African Muslim women.

The above examples set out how the EAP Update could have a positive impact on those people in the EAP area who have a combination of two or more protected or additional characteristics. However, these examples are not intended to be exhaustive and only consider the EAP's land use strategy and the increase in jobs and homes which the EAP's policies and site allocations are intended to deliver. The other strategies within the EAP Update are also likely to have a positive impact on those in the EAP area who have two or more protected or additional characteristics. There will also likely be other combinations of protected / additional characteristics who would be positively impacted by the increase in jobs and homes (e.g. people from ethnic minorities who have disabilities).

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

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

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

List the groups you intend to engage and reference any previous relevant activities, including relevant formal consultation? ²⁶	If engagement has taken place, what issues were raised in relation to one or more of the protected characteristics or the other characteristics about which the Council takes an interest, including multiple or intersecting impacts for people who have two or more of the relevant characteristics?	How the EAP Update has responded to the issues raised:
The development of Euston station is a long-term and complex project, which involves many organisations and has already spanned several years. Given the number of individual projects at Euston (including HS2 and the Lendlease Masterplan) there can be multiple 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.	<p>In general, 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.</p> <p>Disability Concerns were raised with issues related to disability including repeated concerns about accessibility (such as step-free access to stations and routes and better provision for blind/visually impaired people). Concerns were also raised with abandoned hire bikes which pose a trip hazard for elderly and less mobile people, and especially for those with sight problems. There were worries about</p>	<p>Disability</p> <p>In response to concerns relating to disability, the EAP Update includes additional guidance and increased emphasis on the needs of people with disabilities including those with reduced mobility and visual impairment. For example, the EAP Update now acknowledges that disabled people are more likely to travel by bus and the updated EAP expects designs for the new stations and new development and wayfinding should be accessibility audited with input from disabled people including visually impaired people.</p> <p>The EAP Update expects new and enhanced dockless bike infrastructure which</p>

²⁶ This could include our staff networks, advisory groups and local community groups, advice agencies and charities.

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<p>Engagement for the update to the EAP builds on the engagement and consultation that has happened to date, including formal consultation on the draft Euston Planning brief which took place in early 2020. In addition, in 2018, the Council hosted the Euston Residents' Assembly with the goal of engaging a representative group of area residents to help shape the future of Euston and inform the Euston Planning Brief. The Assembly consisted of a core group of 25 residents from the Regent's Park, and St. Pancras and Somers Town wards.</p>	<p>the impact of long-term construction works on mental health and wellbeing and recognition that buses are a lifeline for those with mobility issues, and calls to maintain bus routes which are particularly important for blind people.</p> <p>Age</p> <p>Comments highlighting the needs of elderly people:</p> <ul style="list-style-type: none"> • Safe walking links and step-free access for those with ambulatory difficulties • Concerns that cycling- and walking-focused schemes may disadvantage elderly or mobility-impaired residents who rely on their car. • Requests for high-quality seating so that older people (and parents/disabled people) can rest. 	<p>may help with the issue of abandoned hire bikes.</p> <p>The impact of construction works on mental health and wellbeing can be partly mitigated by the requirement for Construction Management Plans (CMP) for all major developments which need to address environmental health impacts as well as any cumulative construction impacts as a result of activity from multiple sites in close proximity. CMPs are subject to consultation with those communities which may be affected by construction impacts.</p> <p>Age</p> <p>In relation to concerns that the elderly / mobility impaired are disadvantaged by the EAP's focus, London-wide data and Camden specific data shows that the majority of older people and people with disabilities make their journeys on foot or using buses. Therefore, making it easier and safer to walk and cycle in the Euston Area would have benefits for older and mobility impaired people who rely on walking or cycling to make their journey. It would also help to take pressure off buses by enabling more people to make their journey on foot or by bicycle, which would be of benefit to older or mobility impaired people who rely on buses to make their journey.</p>
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		The EAP has updated the measures to promote walking and now makes specific reference to public realm improvements which include street greening and seating.
<p>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.</p> <p>The update to the EAP has included a range of consultation and engagement, with informal engagement with communities. These have taken place among ongoing communication with local stakeholder groups and participation at community meetings.</p> <p>Building on the Council's longstanding interest in 'deep dialogue', and in citizens' assembly models of deliberative democracy, the Euston Residents Advisory Group (RAG) brought together a diverse, broadly demographically representative group of 30 adult Camden residents, recruited and randomly selected with help from the Sortition Foundation.</p> <p>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</p>	<p>Children & Young People</p> <ul style="list-style-type: none"> • Recognition that Somers Town has a large number of children and young people, and this should be factored into planning • Concerns about the impact of development on the Regent's Park Estate children's centre, which provides a nursery, stay-and-play, and family support. • Calls for more green space and play areas for children <p>Race / Religion / Belief</p> <p>No direct comments, but some submissions highlight the importance of cultural diversity and heritage:</p> <ul style="list-style-type: none"> • Calls to protect local churches (e.g., St Mary's) and their role in community identity • References to the GLA Diversity in the Public Realm Commission, emphasising inclusion of more diverse histories and representation in heritage and public art <p>Pregnancy/Maternity</p> <p>Specific comment that Cumberland Market, Clarence Gardens and Munster Square need to be connected by step free access for wheelchair users and those with prams</p>	<p><u>Children and young people</u></p> <p>The EAP recognises that the Euston area has a relatively young population and the positive impacts from the EAP Update on younger people have been identified in the preceding section.</p> <p>The Local Plan protects community facilities and the existing Children's Centre would need to be reprovided as part of any future planning application to redevelop this site. Development proposals are expected to provide space that meets the needs of children and young people of all ages. The EAP Update also includes a new requirement for major applications to provide a 'Public Open Space and Green Infrastructure Strategy and Management Plan'.</p> <p>Race / Religion / Belief</p> <p>Churches and other community facilities are protected by existing Local Plan policies. Proposals for the public realm including public art would be expected to respond to Camden's Strategy for Diversity in the Public Realm.</p> <p>Pregnancy/Maternity</p> <p>The EAP Update identifies the opportunity to address long standing accessibility and</p>

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<p>policy, through feeding into the update of the EAP.</p> <p>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.</p> <p>Feedback from the sessions have been incorporated into the proposed EAP updates. The EAP Update also took account of consultation with business and community groups.</p> <p>There was a public consultation on the EAP Update running from 4th January 2023 for 6 weeks. The public consultation was open to local residents, businesses, landowners, workers, community groups and all those with an interest in the Euston Area Plan Update. A wide range of consultation techniques were used to engage the public and interested parties and encourage feedback.</p> <p>An online consultation platform, Commonplace, was used during the consultation. During the consultation period,</p>	<p>together with the creation Zebra crossings. As referred to above, there was a concern about the impact of development on the Regent's Park Estate children's centre which provides breastfeeding drop-ins and baby bonding.</p> <p>Sex, Gender Reassignment, Sexual Orientation, Marriage/Civil Partnership</p> <p>No explicit references to these characteristics.</p> <p><u>Other characteristics</u></p> <p>Low-income households</p> <ul style="list-style-type: none"> Multiple comments emphasise the need for genuinely affordable housing, warning that "affordable" as defined by developers is not truly accessible to low-income residents. Concerns raised that high-rise and luxury development will displace existing deprived communities in Somers Town. Calls for housing to prioritise social rent and council homes, not market-rate "affordable" units. <p>Parents (of children under 18)</p> <ul style="list-style-type: none"> The development should meet local needs, including schools. Concern regarding the impact of development on Regents Park Children's Centre. More green space and play areas for children. 	<p>public realm issues. Policy C6 in the Local Plan seeks to promote fair access and remove the barriers that prevent everyone from accessing facilities and opportunities.</p> <p>Low-income households</p> <p>The EAP Update maintains the policy of negotiating the maximum reasonable amount of good quality, genuinely affordable housing from development proposals. The Local Plan prioritises social rent affordable housing. Social Rented homes have capped rent levels based on the national guidance issued by the Regulator of Social Housing.</p> <p>The EAP only identifies one estate in Somers Town, Churchway, where opportunities for renewal and intensification will be explored with residents and the local community. The Local Plan Policy is to protect and improve affordable housing.</p> <p>Parents (of children under 18)</p> <p>Based on current population trends and existing and potential future capacity in local schools, it is expected the level of growth outlined in the EAP Update can be accommodated in existing facilities. The EAP Update seeks sufficient provision of other community facilities to support new development so that additional demand does not place unacceptable pressure on</p>
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<p>there were 3,784 visitors to the Commonplace website and a total of 147 respondents who made 400 contributions. Most respondents were aged over 45 and lived or worked in the Euston area. In terms of ethnicity, of the 48 people who responded to this question 72% were white (35) with 12.5% 'other white' (6) and 8% 'mixed / multiple' (4).</p> <p>In July 2024, the Council carried out additional consultation to highlight key Government announcements and the effect that they could have on the updates to the EAP. All responses to the consultations have been considered and the Council has published a summary of these responses and the Council's response to them.</p>	<p>People who are homeless</p> <ul style="list-style-type: none"> Concern about ASB and rough sleepers in the area. <p>Private rental tenants in deprived areas</p> <ul style="list-style-type: none"> Concern that limiting student housing will push more students into the private rented sector, increasing pressure on already overstretched rental markets Strong objections to developments that may fuel transience and high rents in the area, making it harder for stable communities of renters to remain. <p>Single parent households</p> <ul style="list-style-type: none"> No direct mentions of single parent households, but related concerns about affordable housing and childcare. <p>Social housing tenants</p> <ul style="list-style-type: none"> Comments on the importance of protecting and enhancing social housing stock in Somers Town and concerns about excess density of development in Regents Park Estate. Objections to demolition proposals for estates such as Churchway. Calls to prioritise council housing for rent and to avoid "gentrification" that undermines existing social housing communities. 	<p>existing community facilities. The draft EAP also sets out that the Council will seek contributions for the provision of community facilities.</p> <p>People who are homeless</p> <p>The EAP Update addresses anti-social behaviour and acknowledges this is a longstanding concern of local communities. The Council recognises that everyone deserves a place they can call home and the Council's homelessness and rough sleeping strategy commits the Council to use its resources and creativity to make homelessness rare, brief and non-recurring. This strategy will help to address those who are homeless and rough sleeping in the Euston area.</p> <p>Private rental tenants in deprived areas</p> <p>The EAP Update allows for a proportion of student housing as part of the overall housing mix. However, Camden Council's overall priority is to maximise the provision of housing units as permanent homes to meet local housing needs. Therefore at least 75% of new housing should be provided as permanent self-contained homes. Consultation responses showed that housing, particularly affordable housing was the most frequently prioritised for accommodation in the EAP area by local</p>
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		<p>communities and organisations such as the Francis Crick Institute and Wellcome Trust. While the EAP limits the amount of student housing that should be provided in the EAP area, student housing is also likely to be provided in areas around Euston and the overall Council target for student housing is 200 additional places per year as set out in the Camden Local Plan Proposed Submission Draft.</p> <p>Single parent households</p> <p>The EAP Update maintains the policy of negotiating the maximum reasonable amount of good quality, genuinely affordable housing from development proposals. Such housing may benefit single parent households who are eligible for social housing or intermediate housing. In relation to the concerns about childcare, the EAP Update seeks sufficient provision of community facilities to support new development so that additional demand does not place unacceptable pressure on existing community facilities. The Local Plan protects community facilities and the existing Children’s Centre in the Regents Park Estate would need to be reprovided as part of any future planning application to redevelop this site.</p> <p>Social housing tenants</p>
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		<p>The Council's Local Plan includes a policy which seeks to protect low-cost rented housing and intermediate housing managed by the Council and registered providers and the Local Plan sets out that the Council will work to regenerate existing estates and provide more and better affordable homes through the Community Investment Programme and Better Homes Programme.</p> <p>Opportunities for renewal and intensification of Churchway would be explored with residents and the local community and there are no specific proposals for demolition at this time.</p> <p>A key objective of the EAP is to prioritise local people's needs including providing new homes and jobs, and reproviding open space lost to HS2 construction. The EAP Update states: "Provision should include the maximum reasonable amount of affordable housing provision, taking into account any relevant viability issues, in line with Camden's Local Plan." Any social rented housing provided would be managed by a Registered Provider who will have entered into a standard nominations agreement with the Council allowing nominations from the Council's housing register.</p>
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4.b. Where relevant, record any engagement you have had with other teams or directorates within the Council and/or with external partners or suppliers that you are working with to deliver this activity. This is essential where the mitigations for any potential negative impacts rely on the delivery of work by other teams.

The preparation of the update to the Euston Area Plan has been made with the input of a large number of other teams within the Council who have provided guidance and advice and ensured the document has been prepared in accordance with other strategies within the Council. The following teams and external partners have been involved in providing guidance, comments and other input to help officers update the EAP:

- Urban Design
- Conservation
- Transport Strategy, Policy and Planning
- Sustainability / Air Quality
- Economic Development
- Housing
- Community Investment Programme Team
- Adult Social Care
- Schools
- Public Health

External partners

- Greater London Authority
- Transport for London
- HS2
- Network Rail
- The Euston Partnership
- Lendlease

Nearby Landowners

- Origin
- UCL
- Royal Mail

Neighbouring Planning Authorities

- LB Brent
- City of London
- LB Haringey
- LB Islington
- City of Westminster

Statutory bodies

- Historic England
- Environment Agency
- Natural England

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Step 5: Informed decision-making

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

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

1. Change the activity to mitigate potential negative impacts identified and/or to include additional positive impacts that can address disproportionality or otherwise promote equality or good relations.	
2. Continue the work as it is because no potential negative impacts have been found	<p>No potential negative impacts from the policies in the plan have been identified.</p> <p>However, it is noted that largescale construction works will impact on environmental conditions (noise, dust etc.) that could present negative health impacts for people of all ages. The age groups most vulnerable to air quality impacts are the young the elderly and those with existing health conditions²⁷. However, given the mitigation to minimise air quality impacts that would be secured through various policies including Local Plan policies (examples being Construction Management Plans, Camden Clean Air Strategy 2019-2034 and Camden Clean Air Action Plan 2022-2026, Euston Road Air Quality Focus Area, Euston Healthy Streets and Submission Draft Local Plan 'Policy A3 – Air quality' which requires development to achieve air quality neutral and encourages the adoption an air quality positive approach) there would be an overall positive impact on air quality. This would be further enhanced by 'Strategic Principle EAP 5: Open space and green infrastructure' which seeks an enhanced green infrastructure network as well as the statutory requirement for biodiversity net gain.</p>

²⁷ 'Impacts of air pollution across the life course – evidence highlight note' – Imperial College London Environmental Research Group April 2023

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<p>3. Justify and continue the work despite negative impacts (please provide justification – this must be a proportionate means of achieving a legitimate aim)</p>	
<p>4. Stop the work because discrimination is unjustifiable and there is no obvious way to mitigate the negative impact</p>	

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Step 6: Action planning

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

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

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

Action	Due	Owner
Construction Management Plans	Prior to commencement of development	Developer
Camden Clean Air Strategy 2019-2034 and Camden Clean Air Action Plan 2022-2026	Long-term strategy	London Borough of Camden
Euston Road Air Quality Focus Area Euston Healthy Streets	Medium-term strategy	London Borough of Camden (Transport Strategy); Transport for London
Submission Draft Local Plan 'Policy A3 – Air quality'	Submission of planning application	Developer
Strategic Principle EAP 5: Open space and green infrastructure	Submission of planning application	Developer
Biodiversity Net Gain	Submission of planning application	Developer

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Action	Due	Owner

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Step 7: EqlA Advisor

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

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

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

If you feel you could benefit from further advice, please contact the Equalities service at equalities@camden.gov.uk

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Step 8: Sign-off

EqlA author	Name: David Peres da Costa Job title: OSD Principal Planner Date: September 2025
EqlA advisor / reviewer	Name: Therese Gallagher Job title: Euston Manager Date: October 2025
Senior accountable officer	Name: Mary-Ann Lewis Job title: Head of Euston Regeneration Date: October 2025