

LB CAMDEN

**EQUALITY IMPACT
ASSESSMENT**

**NEW HOMES FOR SMALL
SITES PROGRAMME**

EXECUTIVE SUMMARY

December 2022



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New Homes for Small Sites Programme

**Independently Reported by Ottaway Strategic Management Ltd
December 2022**

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1 Executive Summary

- 1.1 This Equality Impact Assessment (EqIA) has been commissioned by LB Camden to assess the Homes for Small Sites programme. The assessment is based on information currently available on the development proposals for the 10 sites identified by the council as part of the programme. The EqIA seeks to identify the potential and likely equality impacts of the scheme as a whole and separately for each of the 10 sites currently being appraised by the council. Its primary focus is to identify potential positive and negative impacts of the scheme and set these against the protected characteristics of the Equality Act 2010.
- 1.2 The programme is seeking to develop land within these 10 estates to build additional housing that will be either developed by the council for social rented or Camden intermediate rentals or privately developed to cross subsidize the council units. In total the 10 sites will generate approximately 98 units although this figure is likely to be refined through the full appraisal, business case and planning process.
- 1.3 Fundamentally the scheme is seeking to develop land that is under the council's ownership, which in the majority of cases is currently used for car parking, be this hard standing parking, garages or undercroft parking. To this end there will be no requirement for CPO, or for residents on the estates to be relocated through the course of the development as in the case of estate regeneration schemes. This infill development will incur minimal demolition although there will clearly be the requirement to assemble the site and to undertake ground works prior to construction.
- 1.4 This EqIA will provide a baseline assessment and recommendations for any potential mitigations and future engagement and delivery, which can be incorporated into the Cabinet report and future strategy for engagement and delivery of the programme.

Demand for Housing

- 1.5 There are currently 15,871 applicants on the borough's housing waiting list. The demand for housing in the borough is high. As of the 2021 census there were 92,758 households in Camden of which 35,931 were one person households (38%) and 45,716 were single family households (49%) and 11,111 were multi-family households (12%). Through the 2021 census 11.4% of households were lone parent families, 6.4% were families with dependent children and 5% were families with non-dependent children.
- 1.6 In 2011 the proportion of households with an overcrowding rating was 32% compared to 8.7% across authorities in England. The Department for Communities and Local Government stated in their 2016-31 housing projections that household numbers in Camden will increase by around 19,900 over the 15-year period 2016-31, an average of 1,330 per year. This was adjusted by the GLA 2014-round long-term migration trend

(2001-13) by 6,673. The most recent estimates suggest that the tenure mix in 2019 was 37% owner occupied, 33% private rented and 30% social rented.

- 1.7 Average house prices in Camden are the 4th highest in the country after Kensington & Chelsea, Westminster and Hammersmith & Fulham. Average prices in Camden peaked in July 2019 at £894,898¹, but prices fell back to £829,857 in June 2022. Demand for housing is high in Camden.

Demographic profile

- 1.8 The equality profile of those likely to be affected by the scheme has been taken from current wards demographic data and some estate population data has been taken from the council housing management system. In addition an analysis of the borough housing register/waiting list has also been undertaken to review the profile of those most likely to benefit from the new homes. Collectively this provides a proxy measurement of the demographic profile of the population likely to be immediately affected by the development proposals.
- 1.9 The demographic profile of those on the current housing waiting list suggests that the diversity of those on the housing register is significant, particularly in terms of gender (57% female) and ethnic diversity with a far higher proportion of ethnic minority applicants (76%) than the profile of ethnic minority populations in the borough (56%).
- 1.10 A demographic profile has been undertaken of each of the 8 wards that these 9 estates and non-residential block are based within. From north to south these wards include West Hampstead, Highgate, Kilburn, Kentish Town² North, Kentish Town South, Camden Town, St Pancras and Somerstown, and Holborn. Clearly there are variation between these wards, however what this analysis shows is that when compared to the population profiles for the whole borough there were higher levels of racial diversity in St Pancras and Somerstown, Kilburn, Holborn and lower levels of diversity in Kentish Town, Highgate and Camden Town.
- 1.11 In terms of age there are higher proportion of children (u16) in Kilburn, St Pancras and Somerstown and Highgate. The young person population (17-24) has higher profiles in St Pancras and Somerstown and Holborn. The working age population is larger in West

¹ Land Registry in the period 1 Jan-08 to 30 Jun22, © Crown copyright 2022.

² These wards are based on the re-drawn ward boundaries, however data used in the EqIA is based on the old Ward Boundaries and hence Kentish Town is used as a proxy for the newly drawn Kentish Town North and Kentish Town South.

Hampstead, whereas the 65+ population was highest in Highgate, Camden Town and Kilburn.

- 1.12 In terms of disability there are clear variations with higher levels of life limiting illness or disability in Kilburn (18.5%), St Pancras and Somerstown (18.4%), Highgate (15.9%) and Holborn (15.7%) and lower levels in West Hamstead (12.5%). The Camden rate is 14.4%.
- 1.13 From a religion and belief perspective in Camden 38.5% are Christian, 29.1% of the population have no religion and 13.8% are Muslim. The remaining faiths³ come to 8.6% of the population and 9.6% of the population did not state a religion in the census. Clearly there are some variations within the Camden small sites wards. The higher proportions of Christians are in Kilburn and Highgate, higher proportions of Muslims are in St Pancras and Somerstown and Kilburn and highest proportions of those with no religion in Kentish Town, Highgate and Camden and Primrose Hill.
- 1.14 The gender profile of Camden is 51% female and 49% male, this is broadly consistent with the profile in London and nationally⁴. There are higher proportions of females in Highgate, Kilburn, St Pancras and Somerstown and higher proportions of males in Holborn, and Camden Town.
- 1.15 The lone parent profile in Camden is 6.4%, below the London and national profiles. However there are some significant variations within some of the Camden small sites wards. St Pancras and Somerstown has a higher proportion of lone parents at 10.7%, followed by Kilburn with 8.4%, Kentish Town with 7.4% and Highgate with 6.9%.
- 1.16 In Camden 76.5% speak English as their main household language. St Pancras and Somerstown, Kilburn and Holborn have lower proportions of English speaking households. Bengali (including Sylheti and Chatgaya) represents the largest proportion of non-English languages spoken by households and this is followed by European and some eastern European languages. Somali is spoken to a larger degree in St Pancras and Somerstown and Kilburn.
- 1.17 With regard to other protected characteristics there is limited ward data on sexual orientation and trans gender identity. There is broad parity in marriage and civil partnership across the wards, as is the case in terms of birth rates, a proxy measurement for pregnancy and maternity.
- 1.18 The demographic profile of those currently living on the estates shows that in summary the 10 estates have higher levels of racial diversity than the borough and London profiles, with a smaller proportion of older tenants and residents, lower levels of disability

³ Buddhist, Hindu, Jewish, Sikh and Other religions

⁴ The 2011 Census only included Male and Female options in the Gender question.

reporting, higher levels of lone parent reporting and broad parity in gender profiles. There are, however, clear variations between each of the estates.

Equality Impact Assessment in summary

- 1.19 From the perspective of the New Homes for Small Sites Programme it is likely that there will be different impacts for people from different protected characteristics. For some protected characteristics there is a strong likelihood that there will be little or no impact, for other protected characteristics these impact will have greater significance and influence on their daily activities.
- 1.20 It is important to distinguish those impacts that are universal and those that will have greater implications for particular protected characteristics. The summary below will review each protected characteristic and identify likely negative impacts and thus make suggestions for the application of actions to mitigate these negative impacts. Most of the negative impacts are likely to be experienced in the preconstruction and construction phases of the programme.

Age: EqIA Finding: Positive and Negative

- 1.21 Working age residents are likely to be affected by these proposals, this reflects the profile in the housing waiting list all of whom are more likely to be working age.
- 1.22 Children and young people and older people are however likely to face greater levels of negative impact from the construction process. Older residents, have the potential to be more negatively affected, for various reasons, for example, older people are more likely to have long term health conditions and disabilities relating to their age; older people are more likely to have lived on their estates for longer, and so may be more concerned about potential construction disruption and/or change in their community. From a positive perspective the new units will be built to Part M of the building regulations equivalent to lifetime home standards.

Disability and Health : EqIA Finding: Positive and Negative

- 1.23 There are likely to be both positive and negative impacts relating to disability as a consequence of the delivery of more affordable homes. Disability and health conditions are highly varied and encompasses a huge range of different types of needs, from those affected by long-term health conditions like diabetes, respiratory and heart conditions, to mental ill health, learning disability, and physical and sensory impairment. The ambition of increasing the supply of affordable homes will have a positive impact on disabled

residents and those with health conditions by improving the quality of housing, and ensuring new units meet the needs of individual disabilities and impairments.

1.24 However, disabled residents and those with long term health conditions could be more likely to be negatively impacted where they are living adjacent to the development sites, by the stress and physical changes to their home environments through the construction process. Effective resident engagement, consultation and communication should mitigate some of these negative impacts. The delivery of the New Homes for Small Sites programme in the borough should ensure that a proportion of these new homes will reflect residents' health and care needs.

1.25 Potential positive impacts on health and disabilities

- New homes will be built to Part M of the building regulations (equivalent to lifetime homes standards)
- Specific properties will be built for disabled people and will have relevant adaptations and equipment built in when recommended by assessment
- Access and egress from any new homes will be supported with lifts and dedicated disabled parking supported by secure design principles
- Greater choice to disabled people who cannot achieve independent living due to lack of suitable housing in the borough's housing stock
- Application of Considerate Contractor scheme should minimise negative impact during construction (NB. this is not a positive in itself but a form of mitigation).
- Ongoing dialog with construction teams and resident liaison officers would be critical throughout the scheme, to allay fears and to respond to negative impacts caused by the demolition, sitework and construction process.

1.26 Potential negative impacts (Particularly for those adjacent to the site include):

- Quality of life will be affected by any construction, particularly if their disability is accompanied with any breathing or sensory condition
- Sensory impairment will be affected particularly by those that are disturbed by loud noise or construction machinery
- Some householders with a neurological and nervous system related condition are likely to experience negative impact through the implication of construction activity particularly noise, (sudden and constant).
- People with learning difficulties, subject to the intensity of their condition, will also be affected by any construction process and may need separate forms of communication and engagement to enable their understanding of the reality of their situation
- People with mental health issues may suffer greater levels of anxiety and depression and episodes of mental ill health as a result of the new homes delivery which for some will be in close proximity to where they live.

Marriage and Civil Partnership: EqIA Finding: None/Neutral

- 1.27 It is worth noting that in law marital status does have an impact, particularly, with regard to property tenure, ownership rights and access to finance/lending/pensions.
- 1.28 However the Homes for small sites programme will not be demolishing any existing buildings and hence as such there will be no requirement to relocate any current residents. Thus the negative impacts of the development programme that generally apply to the protected characteristic of Marriage and Civil Partnership would not apply in these development proposals.
- 1.29 Thus the development programme itself does not present direct negative impacts on the grounds of marriage or civil partnership and is thus seen as equalities neutral.

Pregnancy and maternity EqIA Finding: Positive and negative

- 1.30 There is potential for both negative and positive impacts for expectant mothers and those who are in their first 6 months of maternity particularly for those living adjacent to the development sites.
- 1.31 Possible negative impacts
- There may be disruption during any construction period, the Council should provide access routes around a development site. This may negatively impact on pregnant mothers or families with newborn children in prams.
 - Any construction disruption resulting in noise, dust and vibrations may intensify any post-natal depression and or perinatal mental health.
 - Dust and noise disruption may affect infant sleep patterns and would have an impact on mothers who have disturbed night times due to feeding patterns.
- 1.32 Potential positive Impacts
- New housing will have greater accessibility for parents with buggies etc.
 - New homes will be better insulated and should support parents of newborn babies or mothers in periods of pregnancy and maternity.
 - The layout of any new homes will address improved access, via lifts and stairs. Current design standards suggest that no unit above four stories high will be without a lift.
 - Improvements to the public realm should consider accessibility for people moving around the estates for example those pushing buggies etc.
 - Some of those on the housing waiting list who are pregnant at the time of housing allocation may be entitled to a larger property.

Race: EqIA Finding: Neutral

- 1.33 The racial profile of the borough is extremely diverse and shows that 44% are white British, 56% are ethnic minorities and 33.7% are black, Asian, mixed and from other ethnic groups. There are however quite significant variations across the small sites wards.
- 1.34 The positive impacts of the delivery of new homes are likely to apply to all racial groups. The processes of design and planning, phasing, decanting, demolition, construction, and housing allocation are not determined by race or indeed any other protected characteristic. In spite of the considerable diversity on the ten estates, the proposals do not disproportionately impact on any specific ethnic group. In short, new homes will be available to all communities in the same way.
- 1.35 The EqIA has highlighted that there may other protected characteristics that will have a higher likelihood of negative impacts particularly residents who are older, pregnant and those with health conditions and disability. Due to the diversity of the sites it is likely that many of these will also be people from ethnic minority communities. There is a risk of indirect negative impacts on ethnic minority populations. It is therefore critical that negative impacts experienced by other protected characteristics are addressed, hence mitigating indirect negative impacts felt by ethnic minority populations.
- 1.36 Correspondingly it is likely that the proportional benefits of the new homes for small sites programme will be felt by diverse ethnic populations. For example, the racial profile of those on the borough's housing waiting list is significantly higher than the borough's overall ethnic profile. Beneficiaries are likely to come from diverse populations.
- 1.37 From the evidence gathered there are no stated negative impacts from a race perspective, these plans are therefore neutral from a race equality perspective.

Religion / Faith: EqIA Finding: None/Neutral

- 1.38 There are no aspects of the new homes for small sites programme and or the allocations process for new residents that would be negative in terms of someone's religion/faith, unless residents were prevented from practicing their religion/faith. Current initial plans do not suggest this being the case.
- 1.39 The Council should be aware of resident's ability to practice their faith through the different stages of any project. The housing allocations team should ask people about their normal places of worship to see the extent to which disruption can be minimised.

Sex (Gender Identity): EqIA Finding: Neutral

- 1.40 More females, and more female-headed households are likely to be impacted by the proposals than the borough average. This reflects the profile of current residents and the profile of the housing waiting list, many of whom are female applicants. The proportion

of women applying for accommodation on the council waiting list is high with 66% female applicants.

- 1.41 The intended outcome of accelerating the delivery of affordable housing in the borough should therefore have a greater positive impact on female-headed households, who are more likely to be the beneficiary of new homes.
- 1.42 The programme may have a beneficial impact for the families on these 10 estates particularly those needing four bedroom homes. Equally this will support those on the housing waiting list to access the homes vacated by existing residents getting access to these new units. Given the demand in the borough for larger family units, it is likely that the allocation will be made to families some of whom may be female led single parent families.
- 1.43 There is a relatively high level of households adjacent to each of the development sites that are single parent families. The vast majority of these are households headed up by women.
- 1.44 The development plans for these 10 sites will affect communities adjacent to them. However there are no stated negative impacts from a gender equality perspective, regeneration plans are therefore equality neutral from a gender equality perspective.

Sexual orientation: EqIA Finding: None/ Neutral

- 1.45 There is currently no reliable data available for the population at either the borough or ward levels. London wide data suggests that around 3.5% of people in London are Lesbian, Gay, Bisexual and Transgender (LGBT).
- 1.46 The New Homes for Small Sites Programme and its allocation of housing is governed by the borough's allocation policy which seeks to take protected characteristics, in particular sexual orientation, out of the decision making/allocations process. Evidence from the data and the review of the proposals suggest that there are no discernible negative impacts identified for LGBT groups.
- 1.47 Any new homes will be secure by design, and this should afford greater levels of safety. The design of the new homes and spaces will create a place and homes that can be policed more easily and that would be safer. Moreover improvement to the public realm will offer a greater level of security to all which may be relevant to LGBT residents who are more likely to be subject to hate crime and harassment.

Gender reassignment/Transgender: EqIA Finding: None/Neutral

- 1.48 Borough wide data on trans individuals is not available. Housing register data on trans individuals suggest that there are some 30 applicants out of 15,000 who are or who have undergone a gender reassignment.
- 1.49 Applicants for social and affordable housing are given priority according to the housing policy criteria, and transgender is not currently a consideration of the policy. More work may need to be done to understand the housing needs of trans communities, but few authorities have been able to undertake this work. Nonetheless, as housing services are or should be customer-focused, the borough's housing policy should seek to address individual circumstances where needed.

Class or socio- economic disadvantage: EqIA Finding: None/Neutral

- 1.50 The New Homes for Small Sites Programme will have impacts on residents, tenants and leaseholders alike, which might incur greater costs, particularly for those residents who will take receipt of a new home. Indeed following the Government's social rent formula, these residents are likely to have slightly higher social rents.
- 1.51 This could become a burden for those residents unable to afford the associated costs, for example there may be a consequential rise in the value of the new properties in terms of real value and cost of living. Some of the consequential direct costs of any scheme will be addressed including legal costs, disturbance and moving costs. Nonetheless there may be some protected characteristics that may have a disproportionately higher level of impact.

Language: EqIA Finding: None/Neutral with some potential secondary negative impact

- 1.52 Across the borough in previous EQIAs undertaken in relation to 'estate regeneration' programmes it is clear that households for whom English is a second language, nearly all have someone within the household who is able to speak English. This however is not universal and insight from previous EQIAs suggests that households where English is a second language tended to be less well informed or aware of the proposals and their likely impacts. Access to information is important and language may be a barrier for some.
- 1.53 Therefore, the mitigations addressing language and translation are particularly important to take forward. These also need to be monitored in terms of take-up and utilisation. The role of independent resident advisors on any housing scheme to particularly reach out to residents where English is not the primary language, or where there are difficulties relating to literacy, will be important to ensure that residents understand the programme

including the construction plans. This should be particularly focused on those residents living immediately adjacent to the development sites.

Summary

- 1.54 Based upon the assessment of the initial regeneration proposals shared by the borough there is no suggestion that the scheme is discriminatory and that equality of opportunities and/or promoting good community relations is being prevented. Clearly there will be some residents that will disagree with the programme as they would prefer not to see the development being undertaken. However this disagreement is not founded on equality issues. Indeed, there is nothing in the design of the current schemes for the Homes for Small Sites Programme that fail to meet the council general duty to have due regard to eliminate discrimination, promote equality of opportunity and or to promote good relations between different people.
- 1.55 There are however some areas where negative impact may be experienced by some protected characteristics. These are limited to the protected characteristics of age, disability/health, pregnancy and maternity and language.
- 1.56 Whilst there will be other protected characteristics who share these protected characteristics the negative impact is not a reflection of their race, gender, transgender, religion/faith, sexual orientation, marriage or civil partnership, class or economic disadvantage.
- 1.57 There is some activity that the borough will need to undertake to ensure that these negative impacts are mitigated or minimised.

Generic Mitigation Activity

- Communicating the implications of the construction process to the whole community living in adjacent properties to all sites is important and this should be contained in the construction management plan for each site.
- In particular this would include alerting residents and those in adjacent properties to the site specific activities including piling, ground works, activities that are likely to generate excessive noise and or dust and the use of heavy machinery cranes and traffic movements around the site.
- With respect to all properties adjacent to each site to communicate timetables of key construction activity that can generate noise and construction traffic/disruption so that people and organizations can plan their activities accordingly.
- Establish within the scheme's development agreement direct reference to the council's Public Sector Equality Duty (PSED) and the delegation of that duty to the developer as per the requirements of the Equality Act 2010.

- The council to develop a specific set of mitigations for neighbouring residents that are likely to have severe reactions to the construction programme – to be addressed in the mitigation plan. The plan would need to be supported with engagement with those residents and specific options could include, respite care, short term relocation, household modifications, or alternative local refuges which are 'construction resilient' settings where, disturbance, noise and dust is minimized. The council should be mindful that this will incur additional cost and will need to be appropriate for the needs being presented.
- To work to minimise these impacts and to ensure that the plans set out in the construction management plan are adhered to.
- Further resident research and data will also be needed to fully understand the equality and diversity profile/protected characteristics of current residents on each site. The data available on the housing management system is limited and in many cases incomplete.

Disability Mitigation Activity

- Address any targeted communication with residents in adjacent areas who have a disability and in particular who may need the communications explained to them if they have a disability that may limit their understanding of any general communications.

Age Mitigation Activity

- Address specific communication with older residents in adjacent properties to the site and to support their understanding particularly if they are frail, live on their own and or are vulnerable.
- Ensure that communications is not simply digital and that it is available in alternative formats to support those that are digitally excluded.

Language Mitigation Activity

- To ensure that communications are either translated or provided in alternative formats/mediums for those that require this.

Health and Social Care Mitigation Activity

- To engage with health and social care services locally and to work with known patients who have specific conditions which may be enhanced and or exasperated by construction activity in close proximity to their homes.