

EQUALITY ANALYSIS (EA)

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|-------------------------|---|
| POLICY/PROPOSAL: | Neasden Stations Growth Area Masterplan SPD |
| DEPARTMENT: | Regeneration & Environment |
| TEAM: | Regeneration |
| LEAD OFFICER: | Pratibha Bhatt |
| DATE: | 19 th April 2021 |

NB: Please ensure you have read the accompanying EA guidance and instructions in full.

SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

In collaboration with the Greater London Authority (GLA), Brent Council are delivering a comprehensive Masterplan Supplementary Planning Document (SPD) for the Neasden Station Growth Area (NSGA) site allocation, as identified in the Brent draft Local Plan.

The new London Plan increases Brent's housing target and requires Brent proactively plan to intensify industrial capacity. The Mayor's Transport Strategy proposes the new West London Orbital (WLO) line to support 29,000 new homes across West London. The Mayor's Housing Strategy supports more intensive use of land, assembly and investment in (affordable) homes and infrastructure. Brent's draft Local Plan allocates Neasden Stations Growth Area (NSGA), which currently comprises locally significant industrial sites (LSIS) and includes employment, light industrial, storage, waste, residential, college, station/railway, and petrol station use. Mixed use regeneration of the NSGA site allocation will boost local housing supply, provide industrial capacity and deliver infrastructure to accommodate Brent's growing population.

Brent Council plans to facilitate an effective NSGA Masterplan and SPD to deliver at least 2,000 new and affordable homes, jobs, and supporting infrastructure for the NSGA through industrial intensification and residential co-location. The NSGA Masterplan SPD will promote a high-quality environment and foster a 'sense of place' for the NSGA, and bring forward physical, social and economic regeneration of NSGA and surrounding areas.

Objectives:

The NSGA Masterplan SPD objectives are as follows:

- Realise the ambitions for regeneration and growth set out in the draft Brent Local Plan and the new London Plan;
- Encourage more efficient land use through industrial intensification and residential co-location to increase industrial capacity and meet housing demand;
- Attract long-term investment into the growth area and provide certainty to investors;
- Create an exemplary and characterful place underpinned by robust development, placemaking and sustainability principles;

- Maximise the benefits of the proposed WLO line and support closer working between Transport for London (TfL), the West London Alliance (WLA) and other stakeholders to unlock the potential of key development sites;
- Promote active and sustainable travel modes and encourage the development of new infrastructure and the extension or enhancement of existing infrastructure;
- Enhance the public realm and create healthy streets for people to improve the quality of the local environment;
- Create a new network of green infrastructure and provide much-needed public open space accessible to existing and new communities alike;
- Overcome issues of severance between the growth area and its surroundings and establish links to adjacent development sites and town centres; and
- Support climate change resilience and encourage the adoption of zero carbon and circular economy principles.

2. Who may be affected by this policy or proposal?

The Neasden Stations Growth Area (NSGA) Masterplan SPD would affect various groups of people in the borough, including existing and future residents and communities, local landowners, developers, businesses, community groups and local councillors.

Affected parties will include:

- Local residents of the borough and surrounding boroughs
- Visitors to the borough / tourists
- Businesses / employers / employees
- Landowners / developers
- Service providers of social infrastructure, and their service users e.g. health and social care facilities, education and childcare facilities, sports and recreation facilities, play facilities, community facilities and community groups
- Providers of physical infrastructure e.g. TfL, Network Rail, Cadent / National Grid, Thames and Affinity Water
- Statutory agencies such as the Environment Agency, Natural England etc.
- Developers and registered providers of social / intermediate / affordable housing (e.g. housing associations)
- London Borough of Brent departments and staff, including Children and Young People, Safeguarding, Housing, Adult Social Care, Public Health, Customer & Digital Services (including Revenue and Debt), Environment Services, Regeneration, Growth & Employment
- Councillors / elected members

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

There is relevance to equality and the council's public sector equality duty as the principles and proposals in the NSGA Masterplan SPD will guide major regeneration and growth in the borough planned to be delivered over the next 20 years, and therefore should aim to remove or minimise disadvantages which are connected to characteristics of protected groups.

The NSGA Masterplan SPD plans to meet some of the affordable housing and employment needs of the borough, including the needs of protected groups through for example disabled and supported housing provision. The NSGA Masterplan also aims to secure an enhanced public realm that is safe, accessible and well connected, accessible public green open spaces for all user groups and further provisions for safe walking/cycling routes that will have positive impacts on all groups. Consistent with the three aims of the general equality duty, the NSGA Masterplan SPD aims to eliminate unlawful discrimination, advance equality of opportunity, and foster good relations between different groups.

The NSGA Masterplan SPD will guide comprehensive regeneration and long-term social, economic and environmental sustainability of NSGA as defined by the draft Brent Local Plan site allocation. The document sets out the planning policy context that underpins the vision and objectives for the NSGA, alongside a robust urban design framework that guides future urban developments in the area. The provision of employment spaces/affordable workspaces is expected to advance equality of opportunity, by giving those with less financial security the opportunity to access employment in the NSGA. To bring about comprehensive redevelopment in the area, partnerships are required between landowners and developers, the Council, and the existing and future communities. End users could potentially be from groups with protected characteristics. These partnerships also have the potential to facilitate collaboration between different community groups, and in realising the objectives of the NSGA Masterplan SPD foster good relations and create a sustainable and inclusive neighbourhood.

4. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

| Characteristic | IMPACT | | |
|------------------------|----------|--------------|----------|
| | Positive | Neutral/None | Negative |
| Age | X | | |
| Sex | | X | |
| Race | | X | |
| Disability | X | | |
| Sexual orientation | | X | |
| Gender reassignment | | X | |
| Religion or belief | | X | |
| Pregnancy or maternity | | X | |
| Marriage | | X | |

5. Please complete **each row** of the checklist with an “X”.

| SCREENING CHECKLIST | | |
|---|------------|-----------|
| | YES | NO |
| Have you established that the policy or proposal <i>is</i> relevant to the council's public sector equality duty? | X | |
| Does the policy or proposal relate to an area with known inequalities? | | X |
| Would the policy or proposal change or remove services used by vulnerable groups of people? | | X |
| Has the potential for negative or positive equality impacts been identified with this policy or proposal? | X | |
| If you have answered YES to ANY of the above, then proceed to section B. If you have answered NO to ALL of the above, then proceed straight to section D. | | |

SECTION B – IMPACTS ANALYSIS

1. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

The NSGA Masterplan SPD has built on robust baseline analysis and followed engagement with all internal and external stakeholders identified in the project execution plan; GLA, TfL, WLA, technical project team, landowners and developers, ward councillors and lead member. Brent's draft Local Plan identifies the NSGA as one of 8 growth areas which will deliver the majority of the future housing and employment needs of the borough, and was extensively consulted upon and subject to its own equality impact assessment https://www.brent.gov.uk/media/16415876/core_gen_04-equalities-impact-assessment.pdf. The NSGA Masterplan SPD will be subject to a minimum of 6 weeks public consultation in summer 2021.

The NSGA Masterplan SPD is an opportunity for Brent Council to bring about the physical and socio-economic regeneration of not only NSGA, but also build positive relationships with surrounding neighbourhoods in Church End and the St Raphael's Estate. The NSGA Masterplan SPD conforms to both the draft Brent Local Plan and the new London Plan.

The following sources of information have been used to produce the baseline information as a Local Plan site allocation informing the NSGA Masterplan SPD and this equality analysis.

Population & Equality

- Draft Local Plan and evidence base, London Borough of Brent

Education

- Joint Strategic Needs Assessment (JSNA), 2015, London Borough of Brent
- Brent School Place Planning Strategy (June 2017 refresh), 2019-2024, London Borough of Brent
- Direct engagement with school admissions team

Health & Well-Being

- Direct engagement with NHS including HUDU assessment of future health needs.
- Impact assessment on existing facilities for sports, green space, infrastructure etc. and needs assessment for future provisions and improvements within NSGA.

Water

- Flood risk assessment (Metis survey)
- Flood Risk Management Strategy

Air Quality

- Air Quality Action Plan, 2017- 2022

Soils & Geology

- Contaminated Land Database, London Borough of Brent

Climate Change

- Climate Change Strategy and supporting evidence document, London Borough of Brent
- Draft Local Plan and evidence base, London Borough of Brent

Biodiversity

- Brent Review of Sites of Importance for Nature Conservation

Landscape and Townscape

- Tall Building Strategy, 2019, London Borough of Brent
- Open Space Study, 2019, London Borough of Brent

Waste

- Joint West London Waste Plan
- The new London Plan 2021, GLA

Transportation

- West London Orbital –Strategic Outline Business Case 2019
- Mayor’s Transport Strategy 2018
- Brent Long Term Transport Strategy, 2015-2035, London Borough of Brent
- Brent Cycle Strategy, 2016-2021, London Borough of Brent
- Brent Walking Strategy, 2017-2022, London Borough of Brent

Noise

- London Noise Mapping Service – www.londonnoisemap.com

Local Economy

- Employment Land Demand Study, 2015, ORS
- West London Employment Land Evidence, May 2019
- Brent Workspace Study, 2017, Regeneris
- Brent Employment, Skill and Enterprise Strategy 2015-2020

Housing

- Strategic Housing Market Assessment (SHMA), 2018, ORS
- Brent Inclusive Growth Strategy Research Base, 2019, London Borough of Brent
- NSGA Viability Assessment 2020, BNP Paribas

2. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

| AGE | |
|--------------------------------------|---|
| Details of impacts identified | <ul style="list-style-type: none"> • Meeting some of the borough’s affordable housing and local employment needs is considered to have likely positive impacts on all community groups and ages, especially those with socio-economic disadvantaged backgrounds. • Provision for enhanced public realm and ‘Healthy Streets’, publically accessed green open spaces and an improved movement network and connectivity will have a positive impact on all groups and ages. |
| DISABILITY | |

| | |
|--------------------------------------|--|
| Details of impacts identified | <ul style="list-style-type: none"> • Provisions for accessible housing which are DDA friendly and blue badge parking will be beneficial for beneficial to Disability groups. • Disabled people might also expect to benefit from accessible WLO station (proposed) and improvements to the existing Neasden Station in terms of accessibility. |
| RACE | |
| Details of impacts identified | <ul style="list-style-type: none"> • No obvious impacts upon groups with the protected characteristics of Race is identified in this equality analysis. |
| SEX | |
| Details of impacts identified | <ul style="list-style-type: none"> • No obvious impacts upon groups with the protected characteristics of Sex is identified in this equality analysis. |
| SEXUAL ORIENTATION | |
| Details of impacts identified | <ul style="list-style-type: none"> • No obvious impacts upon groups with the protected characteristics of Sexual Orientation is identified in this equality analysis. |
| PREGANCY AND MATERNITY | |
| Details of impacts identified | <ul style="list-style-type: none"> • No obvious impacts upon groups with the protected characteristics of Sexual Orientation is identified in this equality analysis. |
| RELIGION OR BELIEF | |
| Details of impacts identified | <ul style="list-style-type: none"> • No obvious impacts upon groups with the protected characteristics of Religion or Belief is identified in this equality analysis. |
| GENDER REASSIGNMENT | |

| | |
|---|--|
| Details of impacts identified | <ul style="list-style-type: none"> No obvious impacts upon groups with the protected characteristics of Gender Reassignment is identified in this equality analysis. |
| MARRIAGE & CIVIL PARTNERSHIP | |
| Details of impacts identified | <ul style="list-style-type: none"> No obvious impacts upon groups with the protected characteristics of Marriage & Civil Partnership is identified in this equality analysis. |

3. Could any of the impacts you have identified be unlawful under the Equality Act 2010?

No.

4. Were the participants in any engagement initiatives representative of the people who will be affected by your proposal and is further engagement required?

The NSGA Masterplan SPD has been developed over 2020 through ongoing consultation with a wide range of key stakeholders, with wider public participation limited by the coronavirus pandemic. The Council is committed to re-engaging the local community prior to the statutory public consultation process scheduled for summer 2021. A list of community groups are being identified for this process and will inform the outcomes of the NSGA Masterplan SPD. This equality analysis will be updated following further consultation.

5. Please detail any areas identified as requiring further data or detailed analysis.

N/A

6. If, following your action plan, negative impacts will or may remain, please explain how these can be justified?

No.

7. Outline how you will monitor the actual, ongoing impact of the policy or proposal?

To ensure the NSGA Masterplan SPD remains relevant over the Local Plan period, the Council will consider the need to review the document after 5 years. Notwithstanding this potential for review, the guidance must be sufficiently flexible and capable of responding to changes in market demands and commercial and economic circumstances. These are factors that can radically change in a short space of time. The NSGA Masterplan SPD also provides information on measures that can be taken for future-proofing design in a changing climate

and the vital transitioning to net-zero carbon. New development must embody the principles of sustainability and adapt to future changes, and this is particularly relevant as the NSGA is planned to be delivered over a period of approximately 15-20 years.

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

The strategic objectives of the NSGA Masterplan SPD are to delivery new homes, jobs and infrastructure and in so doing support good growth, uphold high quality placemaking standards, and ensure social, economic and physical regeneration brings forward transformational changes, contributing to a vibrant and inclusive neighbourhood. The NSGA Masterplan SPD will facilitate these objectives and help realise their ambitions for the benefit of the borough's residents, businesses and diverse communities. The NSGA Masterplan SPD aims to meet the housing and employment needs for Brent's communities, support local businesses and communities, and provide opportunities for placemaking. The NSGA Masterplan SPD will have positive impacts on existing and new communities alike, including different groups, as it identifies a range of placemaking, environment and sustainability principles which should apply to and guide comprehensive redevelopment of the area, as well as specific positive impacts for people of different age groups and people with disabilities.

SECTION D – RESULT

| <i>Please select one of the following options. Mark with an "X".</i> | | |
|--|--|----------|
| A | CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED | X |
| B | JUSTIFY AND CONTINUE THE POLICY/PROPOSAL | |
| C | CHANGE / ADJUST THE POLICY/PROPOSAL | |
| D | STOP OR ABANDON THE POLICY/PROPOSAL | |

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

| Action | Expected outcome | Officer | Completion Date |
|--|--|---------|--------------------|
| Statutory public consultation for a minimum of 6 weeks | Review of all comments received through consultation process | PB/SS | Summer 2021 |
| Modification made following consultation and Equality Analysis updated | Integrate all comments and feedback | PB | Summer/Autumn 2021 |
| Adoption of the NSGA Masterplan SPD | The NSGA Masterplan SPD will now apply, any development proposals must take into account and adhere to the principles set out and guidance provided. | | Autumn/Winter 2021 |
| Review periodically (every 5 years) | Monitor and review equalities impacts | PB | Sept 2021 |

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

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|---------------------------|--|------------|
| OFFICER: | Pratibha Bhatt, Regeneration Masterplanner | 09/04/2021 |
| REVIEWING OFFICER: | Bryony Gibbs, Equality Officer | 13/04/2021 |
| HEAD OF SERVICE: | Jonathan Kay, Head of Regeneration | 19/04/2021 |