

## Appendix 7 - EQUALITY ANALYSIS (EA)

<b>POLICY/PROPOSAL:</b>	Wembley Housing Zone – Development of Council sites
<b>DEPARTMENT:</b>	Regeneration & Environment
<b>TEAM:</b>	Regeneration
<b>LEAD OFFICER:</b>	Yaz Aboubakar
<b>DATE:</b>	July 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.

This equality analysis is for the redevelopment of Council-owned sites in Wembley town centre, as part of the Wembley Housing Zone programme to deliver mixed-use regeneration to benefit local businesses, residents and communities.

In February 2021, planning permission was granted for mixed-use schemes on both the Cecil Avenue and Ujima House sites. The Cecil Avenue scheme is for 250 new homes, with 26% or 64 larger family 3 and 4 bedroom homes, c3,600sqm commercial and community floorspace, and a publicly accessible landscaped courtyard. The Ujima House scheme is for 54 new homes and c600sqm workspace. Together the schemes represent the opportunity to regenerate the eastern end of Wembley High Road through high quality mixed used redevelopment and deliver new homes, jobs and infrastructure for the benefit of local residents, businesses and communities. The Council proposes to deliver 50% affordable housing (152 affordable homes) across both sites and to procure a development partner to deliver the schemes.

The schemes are integral to the Council's plan and Mayor's aim to increase and accelerate delivery of new homes within the Wembley Housing Zone. High-quality new homes, workspace and public realm improvements will revitalise and rejuvenate the eastern section of Wembley High Road, linking established Wembley Central town centre with the new Wembley Park regeneration.

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

The Wembley Housing Zone schemes at Cecil Avenue and Ujima House will create new jobs, homes and unlock regeneration opportunities on Wembley High Road.

The schemes will deliver a minimum 35% affordable homes, including larger 3 and 4 bedroom family homes, proposed to be increased to 50% affordable homes, with affordable rented homes available to people on the Council's housing waiting list.

Redevelopment also proposes new community space, responding to consultation feedback from local residents, and new workspace, intended to provide space for existing Brent businesses, and also attract new businesses to the borough.

The Ujima scheme specifically affect Meanwhile Space tenants currently occupying the building on a temporary basis, including :

- Businesses / employees.
- Service providers of social infrastructure and their services e.g. sports and recreation facilities and youth centre.
- End users of the services provided in the building.

Notwithstanding Meanwhile Space lease and their tenants occupation of Ujima House was always temporary in advance of the building being redeveloped, the Council will want to work with landlord Meanwhile Space to assist their tenants in their efforts to find alternative suitable premises.

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.

Yes.

The Wembley Housing Zone developments have been subject to public consultation and the overall response has been positive. Council redevelopment of these two sites will provide new homes, workspace, community facilities and infrastructure. The schemes present opportunities to deliver against the Council's public sector equalities duty in a number of ways, including :

- New homes – new affordable and social housing to alleviate pressure on the Council's housing register, including for larger families and disabled people.
- New workspace – as landowner the Council has some control over which businesses will occupy the workspace, and will seek to promote local employment.
- New community facility – which will be expected to meet diverse local needs
- Publicly accessible courtyard – designed and secured under planning to be open and publicly accessible to the local community

As per planning policy, 10% the new homes will be wheelchair adaptable or accessible, across all unit sizes. 50% of the new homes across the schemes will be affordable, that is 152 affordable housing, with affordable rented homes available to

people on the Council's housing waiting list. 25 disabled parking spaces can also be provided for within the development.

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	
<b>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.</b>		

## 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.

Many households in London already require accessible or adapted housing in order to lead dignified and independent lives: 28,000 are attempting to move to somewhere more suitable to cope with a disability and more than 267,000 need a home adaptation. More Londoners are living longer and more older people are choosing to remain in their own homes rather than go into residential institutions. To address these and future needs, 90% of London's new build housing should be built to Building Regulation requirement 'M4 (2): Accessible and adaptable dwellings and the remaining 10% of new build housing should be built to Building Regulation requirement 'M4 (3): Wheelchair user dwellings'.

For the Cecil Avenue scheme which is drawn to more detailed design, a small proportion of the new housing units (22 no.) do not meet M4 (2) or M4 (3) criteria, due to the provision of these units as stacked maisonettes and the cost of providing a lift to these units being prohibitive and would increase service charges. However, there are 203 housing units which meet the M4 (2) criteria and as per London Plan policy, 10% or 25 no. units are M4 (3) units, and distributed across the site. For the Ujima House scheme drawn to outline design, at least 10% or 5 no. housing units are expected to be M4 (3) Wheelchair user dwellings.

Within Brent, there are communities who tend to have larger family sizes. 4 bedroom homes have been included within the scheme to reflect this need, both within the affordable and private sale homes tenure.

Redevelopment of Ujima House will affect Meanwhile Space and their tenants, who include Yaseen Youth Club and Stonebridge Boxing Club, which provide services to young people. Officers will want to work with Meanwhile Space in their efforts to assist their tenants to find suitable alternative premises, to help try to mitigate any adverse impact on these service providers and users.

The Cecil Avenue and Ujima House development schemes provide a significant amount of workspace (4200sqm) proposed to be retained by the Council and leased/managed to a workspace provider. The workspace therefore provides a valuable opportunity to accommodate businesses and support local employment, and in so doing seek to advance equality of opportunity, with key target groups identified in the Brent's Inclusive Growth Strategy including young black men (aged 16-24) and economic inactive female at risk of increased unemployment.

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".

<b>AGE</b>	
<b>Details of impacts identified</b>	Negative – Young people using the meanwhile youth club and boxing club might be negatively affected as a result of these service providers relocating from Ujima House.
<b>DISABILITY</b>	
<b>Details of impacts identified</b>	Positive – 24% larger family housing and 10% of the homes will be wheelchair adaptable or accessible, with disabled parking facilities.
<b>RACE</b>	
<b>Details of impacts identified</b>	<p>Positive – there are 72 larger 3 and 4 bedroom family homes, provided within the schemes, across the affordable and private tenure, to provide for larger families within the borough.</p> <p>Workspace will target employment opportunities, training and support for Black Caribbean and Black African young men (aged 16 to 24).</p>
<b>SEX</b>	
<b>Details of impacts identified</b>	Positive - Workspace will target employment opportunities, training and support for females entrepreneurs to develop their own business.
<b>SEXUAL ORIENTATION</b>	
<b>Details of impacts identified</b>	Not applicable
<b>PREGANCY AND MATERNITY</b>	
<b>Details of impacts identified</b>	Not applicable
<b>RELIGION OR BELIEF</b>	

<b>Details of impacts identified</b>	Not applicable
<b>GENDER REASSIGNMENT</b>	
<b>Details of impacts identified</b>	Not applicable
<b>MARRIAGE &amp; CIVIL PARTNERSHIP</b>	
<b>Details of impacts identified</b>	Not applicable

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?

4 public consultation events were held in advance of planning application submissions which were open to the wider community, and over 2,000 leaflets distributed with details of the events, with feedback from the events directly influencing scheme design. 67% of feedback completed during the consultation were from Black, Asian and minority ethnic respondents. The majority of respondents are in favour of the scheme with general comments around the need for new community facilities and tree planting on Wembley High Road. The schemes designed and secured under planning would deliver a new community centre and new trees.

Planning applications were subject to statutory consultation, with consultation letters sent to neighbours, local advertisement and site notices, and consultation with partner bodies.

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

During detailed designs, the Council will reach out and/or request that the partner developer reaches out to the Brent Disability Forum to seek their input on scheme designs.

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

For the Cecil Avenue scheme which is drawn to more detailed design, a small proportion of the new housing units (22 no.) do not meet M4 (2) or M4 (3) criteria, due to the provision of these units as stacked maisonettes and the cost of providing a lift to these units being prohibitive and would increase service charges. However, there are 203 housing units which meet the M4 (2) criteria and as per London Plan policy, 10% or 25 no. units are M4 (3) units, and distributed across the site.

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

The proposals is that the affordable homes, commercial and community elements of the schemes will be retained by the Council. Affordable rented homes will be made available to people on the Council housing waiting lists in line with the housing allocation policy.

### 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 schemes have been designed in accordance with all relevant policy and guidance, and will have a positive impact on those with race and disability protected characteristics, and a neutral impact on those with other protected characteristics.

Proposals are to increase the level of affordable housing from the minimum 35% secured at planning to 50% across both schemes, which will help meet housing needs within the borough, including for people on the Council's housing waiting list.

The workspace provision will accommodate businesses and support the local economy, and in so doing can advance equality of opportunity by seeking to reach out to groups disproportionately affected by unemployment and economic inactivity.

Notwithstanding Meanwhile Space lease and their tenants occupation of Ujima House was always temporary in advance of the building being redeveloped, Officers will want to work with Meanwhile Space in their efforts to assist their tenants at Ujima House to find alternative suitable premises, including signposting to estate agents and the Council's Property Team.

### SECTION D – RESULT

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

<b>D</b>	<b>STOP OR ABANDON THE POLICY/PROPOSAL</b>	
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### 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
Ensure that the Council and/or the developer consult with Brent Disability Forum group during detailed designs stage.	Optimise physical access to and within buildings and open spaces for disabled people.	Head of Regeneration	July 2022
Assist Meanwhile Space to find alternative suitable premises for Ujima House tenants, if requested.	Service providers at Ujima House can continue operating in the area.	Regeneration Officer	July 2022
Review procurement, disposal and leasing options for the workspace elements of the scheme to increase local employment opportunities, including for people with protected characteristics identified as being disproportionately affected by unemployment and economic inactivity.	Seek to provide opportunity for unemployed young black men and economically inactive female in the borough.	Regeneration Officer	July 2022

### SECTION F – SIGN OFF

Please ensure this section is signed and dated.

<b>OFFICER:</b>	Yaz Aboubakar
<b>REVIEWING OFFICER:</b>	Bryony Gibbs
<b>HEAD OF SERVICE:</b>	Jonathan Kay