

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	Brent Long Term Transport Strategy Review
DEPARTMENT:	Planning and Development Service
TEAM:	Transportation Planning
LEAD OFFICER:	Tim Martin
DATE:	16.12.2021

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.

The Brent Long Term Transport Strategy 2015-2035 (LTTS) provides the strategic direction for investment in transport in Brent, with the overarching aim of improving transport options for all and to reduce the negative impacts of travel on the borough.

Since the publication of the Plan in 2015 some good progress has been made in key areas – particularly in relation to increasing levels of sustainable travel and reducing casualties on our road network. In addition, a range of schemes and initiatives have been implemented aimed at promoting walking and cycling, tackling vehicle emissions and reducing road casualties.

Despite this, it is clear more still needs to be done – particularly in respect of reducing the environmental and health impacts of traffic in the borough; and making the transport system in Brent safer and more inclusive. To reflect this and in light of changes to circumstances and new policies and priorities, the LTTS is being reviewed.

Transport Issues and Objectives

Section 2 of the draft LTTS provides an overview of the borough and highlights the various transport and wider challenges we face and the principal opportunities to overcome them. It also sets out our overarching aims and objectives.

Despite good progress has been made in recent years, there are still considerable challenges to address, including long-standing issues around congestion, poor air quality and road safety; as well as pressing issues such as poor public health, social inequalities and climate change. The current Covid-19 pandemic has also led to additional challenges, but also provides the opportunity for the Council to explore new ideas.

The draft LTTS objectives - which have been formulated based on the various challenges and opportunities identified and to take account of key national, Mayoral and borough policies and priorities - are:

- A. Reduce journeys made by private vehicles and mitigate the impacts of traffic on the environment and our communities
- B. Increase levels of active, efficient and sustainable travel to reduce pollution and improve peoples' health and wellbeing
- C. Improve safety and security across the transport network
- D. Create healthier, more resilient and more welcoming streets and neighbourhoods
- E. Secure transport improvements vital for delivering new housing and jobs and to connect Brent's diverse communities
- F. Mitigate the transport and related impacts of new development and create sustainable, inclusive places

High-Level Delivery Plan

Section 3 sets out the overarching Delivery Plan - the combination of short, medium and longer-term measures focused on addressing the various issues and achieving the LTTS objectives. It also provides details of how these might be funded; and highlights the key role Brent's communities will play in shaping projects and schemes. Amongst the range of measures and interventions there is scope for:

- New/improved cycling and walking infrastructure – including dedicated cycling and walking links to key destinations in the borough;
- Selective vehicle management measures – including the potential for more Healthy Neighbourhoods and School Streets;
- Greater provision for low/zero-emission vehicles;
- Targeted road safety improvements and casualty reduction measures;
- Improvements to the street environment and public realm – to include additional tree planting and other 'green' infrastructure;
- New bus and rail links/services to the borough's growth areas and additional capacity on existing rail services and bus routes;
- Capacity and access enhancements at key stations and transport interchanges.

Performance Management and Monitoring

Section 4 sets out the proposed performance management and monitoring arrangements - an important element of the LTTS and one which will contribute to understanding progress in delivering the strategy objectives. It details the key performance indicators and targets which the Council and its partners will work towards over the lifetime of the plan, including:

- Increasing walking, cycling and public transport mode share to 80%;
- Increasing the percentage of people doing at least 20 minutes of active travel a day to 70%;
- Achieving a 10% reduction in car ownership and the volume of traffic on our roads;
- Achieving net zero CO₂ emissions; and reducing NO_x and particulate emissions significantly;
- Eliminating all deaths and serious injuries from road collisions; and reducing the total number of pedestrian, cyclist and PTW casualties by 80%;
- Increasing the proportion of residents who have access to frequent public transport services and a safe and pleasant cycle network.

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

The LTTS and the various proposed measures within it will affect all Brent residents, businesses and those people who work, study, visit or just pass through the borough. However, the impacts will vary from one group of people to another, just as current transport conditions and the way people travel affect different groups in different ways. The extent of the impact on different groups will also be influenced by the overarching LTTS objectives.

LTTS Objectives

The main focus of LTTS objectives A and B is on reducing the number of journeys made by private vehicles, particularly for shorter journeys, whilst bringing about a step-change in the use of more active, efficient and greener modes of transport. This will help Brent to become a cleaner, more sustainable borough, as well as helping to improve peoples' health and quality of life. Amongst the main priorities include the need to:

- Reduce overall traffic levels in the borough;
- Significantly increase levels of walking and cycling;
- Increase the take-up of electric and other low/zero emission vehicles;
- Reduce transport related CO2 emissions and improve air quality.

Safety and security across the borough transport network remains a key concern for many, particularly vulnerable groups such as pedestrians, cyclists, women and the elderly. Improving access to and within our town centres and neighbourhoods and enhancing the wider public realm are also key priorities for the Council. The successful delivery of LTTS objectives C and D will go some way to creating a safer, greener and more equitable borough. Of particular importance is the need to:

- Reduce the number of pedestrian, cyclist and powered two-wheeler (PTW) casualties;
- Reduce incidences of speeding traffic and improve safety outside schools;
- Create streets and places that are safe, secure, accessible and inclusive to all;
- Enhance and 'green' the wider public realm.

LTTS objectives E and F are geared principally to supporting growth and regeneration in Brent, and ensuring that new development happens in the most sustainable way. In particular, improving the provision and quality of public transport services and walking/cycling infrastructure is key to delivering new housing and jobs, improving connectivity to and within the borough and enabling 'Good Growth'. Achieving these objectives will help deliver our wider ambitions around housing, the economy and the environment. Specific priorities include the need to:

- Secure improvements to public transport services and infrastructure, including enhancements to the frequency and reliability of bus and rail services and capacity/access improvements to stations and key interchange facilities;
- Make the case for new bus and rail links/services to the borough's growth areas and those locations currently poorly served by public transport;
- Improve pedestrian/cycle connectivity to our town centres, transport hubs, schools, parks and other key destinations;

- Ensure that where new development is planned, it reduces the need to travel overall, but allows for the majority of journeys to be undertaken by active, efficient and sustainable modes of transport.

LTTS Measures/Interventions

At a broad level, it is anticipated that different types of measures and interventions will impact on different groups in different ways. These are summarised below. Further details of some of the more specific impacts on particular groups are set out in Section B(2).

- Measures aimed at reducing traffic, tackling congestion and improving air quality will benefit all groups, but will particularly benefit the very young and the very old and certain BAME groups who are particularly susceptible to the negative effects of, or are more likely to face exposure to, poor air quality.
- With high levels of deprivation and problems with obesity prevalent across the borough, measures to promote healthy, active travel will benefit all groups, but will particularly benefit the very young and and certain BAME communities.
- Measures aimed at making our streets safer, greener and more equitable will benefit all groups, but particularly the very young and the elderly, those with disabilities, women and certain BAME communities. In particular, road casualty reduction measures will particularly benefit the young and certain BAME communities who are involved in a disproportionate number of road collisions; whilst measures aimed at enhancing personal safety/security will particularly benefit the elderly and women.
- Measures aimed at addressing issues of severance and creating healthy, more resilient and more welcoming streets and neighbourhoods will be of particular benefit to the very young, the elderly and disabled groups.
- Measures aimed at unlocking growth and creating exemplar places are predicated on enhancing public transport, cycling and walking links to and between our major town centres and growth areas from outside and within the borough. A particular focus is on improving access by these modes to local health, education, employment and shopping and leisure facilities. Such measures will benefit all groups, but particularly the very young, the elderly and disabled groups.

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.

The Equality Act 2010 covers the exercise of public functions, employment and work, goods and services, premises, associations, transport and education, all of which are either directly or indirectly impacted upon by the the way we all are able to travel to and from any destination or place. Travel and transport is an essential and unavoidable element of everyone's daily life regardless of whether they travel independently, as a passenger or for example as someone awaiting provision of a service in their home or a delivery.

The Council is required by the Public Sector Equality Duty to have due regard to the need to address inequalities and a number of aspects are particularly relevant to the LTTS. These include a requirement to:

- eliminate discrimination;
- advance equality of opportunity between people who share a protected characteristic and those who do not;

- foster good relations between people who share a protected characteristic and those who do not.

At its broadest level, transport is an important facilitator of social inclusion and wellbeing, which can affect economic and social outcomes, and therefore inequality. Where transport is available and affordable, it can provide access to different opportunities and help promote equality. In particular:

- Transport can be integral to improving equality, by increasing access to jobs, education and services. Policies that make transport more affordable (such as concessionary fares/subsidies) can be an effective way to help people living in poverty to access and maintain work. Help with transport costs also has a key role to play in schemes to promote employment. However, careful consideration is needed to ensure these help those most in need.
- Transport policy cannot work in isolation and can have most benefit in reducing inequality as part of wider initiatives, often at a local or place-based level, including on skills, education, employment policy, land use planning and housing.

The LTTS aims to address and improve and advance conditions and opportunities for people living and working in or visiting Brent by removing or minimising disadvantages, taking steps to meet the needs and encouraging participation in public life, particularly among those where this participation is at present disproportionately low. For example, a person with a disability such as visual impairment may particularly benefit from improved pedestrian crossing facilities at junctions or the removal of street clutter from pavements. Similarly, children, the elderly and women will likely benefit from measures that result in a safer, more secure transport system, especially when travelling alone or at night.

That said, it is clear that not all of the proposed measures contained within the LTTS will benefit all groups equally, particularly where they are targeted at addressing a specific issue or a problem that affects a particular group. For example, measures designed to reduce traffic and facilitate healthy, sustainable travel, such as the introduction of cycle lanes or removal of on-street parking, may form an obstacle to certain groups, such as the elderly or disabled, particularly if they do not have the opportunity or ability to travel by means other than car. Such issues would need to be carefully considered when designing, consulting and building such schemes, with appropriate mitigation taken where specific concerns cannot be fully addressed.

For the most part, the various aims, objectives and measures proposed in the LTTS seek to address a wide range of often interconnecting issues, whilst looking to enhance the transport experience for those living and working in, or visiting, Brent. On balance it is anticipated that the benefits these improvements will bring, including those to protected characteristics, will significantly outweigh the disbenefits. Central to achieving this will be the need to continue engaging closely with local communities, our partners and a wide range of stakeholders.

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	Impact Neutral/None	Impact Negative
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Age	X		X
Sex	X		X
Race	X		X
Disability *	X		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

- 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.

Brent currently experiences a range of transport and related problems, many of which are interlinked. These include long-standing issues around congestion and poor air quality, which continue to blight some of our communities. Transport also has a significant impact on and provides opportunities to address a wide range of other issues, including poor public health, social inequalities, climate change and the shaping of the built environment. The current Covid-19 pandemic has also led to additional challenges, whilst planned growth in the borough could potentially lead to increased pressure on the transport system and a worsening of current problems if not carefully managed. Further details of some of the main challenges, and the opportunities to address them, are set out below. The various

challenges have, in part, helped inform the overarching LTTS aims, objectives and proposed measures to be implemented.

Air Quality

- Road transport is the main source of nitrogen dioxide (NO_x) and a significant contributor to particulate matter (PMs) in Brent, two of the most dangerous pollutants which contribute to the premature death of nearly 10,000 people a year in London. Motor vehicles are currently responsible for 49% of NO_x emissions and 30% of PM10 emissions in the borough.
- The Council has a legal duty to reduce pollution and is committed to meeting World Health Organisation (WHO) targets on air quality by 2030. Large parts of the borough are currently designated as an Air Quality Management Area (AQMA) and Air Quality Focus Areas (AQFAs).
- Air quality has a particularly detrimental impact on children, affecting lung development which makes them more susceptible to infection and disease as they grow. They are also more vulnerable to polluted air than adults. Older people who may be more susceptible due to existing illnesses, and pregnant women, are also more vulnerable. People are also twice as likely to be affected by pollution in areas of higher deprivation as these areas have poorer air quality.
- Facilitating the uptake of low/zero emission vehicles through increased provision of electric vehicle charging facilities and the expansion of the London Ultra Low Emission Zone (ULEZ) provide significant opportunities to improve air quality in parts of the borough and will benefit the health of everyone who lives and works in or visits Brent.

Public Health

- Poor health and high levels of inactivity are two of the major challenges facing a large number of Brent's residents. The borough is ranked as the fourth most deprived local authority in London and in 2016 it was named as the fattest London borough. Currently, around 55% of Brent's adult population (aged 18+) are classified as overweight or obese, whilst almost one in three children are classed as obese by the time they leave primary school – way above the London and England average. Brent is also the 4th most inactive borough in London, with around 3 out of every 10 people in the borough currently doing less than 30 minutes of activity a week.
- Providing safe and secure infrastructure to encourage cycling and walking, especially for shorter journeys, represents one of the best ways of addressing challenges around poor health and inactivity. However, the fragmented nature of many of the borough's cycling and walking links often prevents better utilisation of these assets, with a lack of connectivity and route severance cited as problems by users. Other issues often acting as a deterrent to more active travel include high traffic volumes; parking on footways and in cycle lanes; fear of crime/collisions; and poorly maintained and cluttered footways.
- A key opportunity that could benefit the borough's residents is TfL's plan for a London-wide strategic cycle network which, when completed, will place 70% of Londoners within 400 metres of new, high quality, safe cycle routes. Among the schemes currently being developed is Cycling Future Route (CFR) 23 which will link Wembley, Stonebridge Park and Willesden Junction. Another opportunity includes the potential for securing the extension of the Mayor of London's and/or other Cycle Hire Schemes to the borough, however, such schemes can be expensive and possibly unaffordable to those on very low incomes.

Road Safety

- Reducing casualties is at the heart of the Council's approach to road safety, and the number of people killed or seriously injured on Brent's roads continues on a downward trend. However, it is clear that more still needs to be done.
- The Brent Road Safety Action Plan published in 2021 highlights that vulnerable road users, such as pedestrians, cyclists and powered two-wheelers, are the most likely user group to be killed or seriously injured, with a high proportion of serious and fatal collisions occurring at night and at road crossings/junctions. The study concludes that a focus on road safety interventions that aims to reduce these identified 'high risk' collision types will likely result in the greatest progress towards achieving Vision Zero in Brent, but suggests the need for a particular emphasis on tackling road speed; education and behaviour change; and protecting vulnerable road users – a key focus of the revised LTTS.

Climate Change

- In 2019 the Council declared a climate and ecological emergency, stating the need to try and achieve carbon neutrality by 2030. A key priority is to bring about as close as possible to zero the number of petrol and diesel road journeys made in the borough; and to increase significantly journeys made by sustainable modes of travel, such as cycling, walking or public transport.
- It is clear that achieving net zero carbon emissions from road transport in Brent will have significant environmental and health benefits for everyone living, working or visiting the borough. However, it will also require enormous changes in the way that people travel in Brent, in vehicle technology, in the fuel sources that power transport and uptake in the technology that will make travel more efficient or not needed at all.
- Amongst the range of measures proposed in the LTTS include promoting and facilitating greater use of zero emission vehicles; accelerating delivery of planned public transport improvements; promoting the use of technology to reduce travel; reallocating road space to cycling and walking; and ensuring new developments are carbon neutral for transport. Whilst these are all considered essential measures if we are to achieve our overarching targets, some of these are likely to have significant cost implications and possibly unaffordable to those on very low incomes.

Congestion

- Road traffic volumes in Brent have increased in recent years with the number of vehicle miles travelled on the borough road network rising from 582 million in 2015 to 682 million in 2019 – an 18% increase. Parts of the road network in Brent have frequent congestion problems (e.g. A406, A5), whilst journey time reliability for buses on a number of key corridors within the borough remains poor, especially during peak hours. These problems are exacerbated by high levels of car dependency in parts of the borough; a large increase in the amount of lorry and van traffic on the borough road network; and illegal/inconsiderate on-street parking and loading and lack of adequate enforcement in parts of the borough.
- Despite this, there is significant potential to reduce trips by car and increase cycling/walking trips. For example, half of all car journeys in Brent are less than 5km and could be easily walked/cycled. However, there is a need to overcome range of barriers including low levels of cycle ownership; physical severance by major road/rail arteries (e.g. A406); and cultural challenges due to large ethnic community in the borough. Addressing such barriers would particularly benefit people of all ages, disabled groups, and certain BAME groups.

Transport Connectivity

- There is a lack of public transport links to and within parts of the borough and the borough's cycling and walking links are often very fragmented. The public transport network is almost exclusively focussed around radial routes to and from Central London with limited east-west and orbital connectivity; whilst severance caused by major infrastructure, such as the A406, waterways and several railway lines are often cited as a barrier to people wanting to cycle or walk more.
- Proposals for new public transport links (e.g. West London Orbital, new/enhanced bus services) to improve cross borough/sub-regional transport links, demand responsive transport services to complement the existing bus network; and the delivery of a London-wide strategic cycle network (e.g. Future Cycle Route 23) would greatly benefit borough residents, particularly those more isolated groups, such as the elderly and disabled.

Accessibility

- Similar to the above, parts of Brent experience problems of poor accessibility, in particular, the lack of cheap, reliable or easy to use alternatives to car use for journeys not possible by foot/cycle: For example, the cost/availability of public transport services and facilities in some parts of the borough can be an issue – particularly for those on low incomes, the elderly and disabled.
- These problems are sometime compounded by a lack of step-free access and staff presence at stations; lack of wheelchair space on buses; lack of/unclear travel information; and poorly lit/badly maintained infrastructure. In addition, there are issues surrounding the quality and frequency of some local bus and rail services. In particular, pre-Covid, many peak-time public transport services were at capacity or experienced overcrowding.
- However, there are significant opportunities to address such issues. New developments, especially in key growth areas and around transport hubs will provide funding opportunities to address issues of station overcrowding/secure step-free access; whilst better bus design and roll-out of improved journey planning tools/travel mentoring could enable spontaneous and independent travel for many disabled and older people. In addition, capacity and service reliability improvements on the rail network, including longer, more frequent trains (e.g. through the implementation of a 'Digital Railway') could provide significant benefits to many different groups.

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	<p>With around 55% of the adult population in Brent classified as overweight or obese, and with almost one in three children in the borough classed as obese by the time they leave primary school, measures to promote healthy, active travel will positively benefit young and old.</p> <p>Measures to reduce traffic and promote the use of zero emission vehicles will bring significant improvements to air quality, which will be particularly beneficial to children and those with underlying health issues, including older people. In particular, children driven to primary</p>
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	<p>school are exposed to higher levels of harmful particulates and NOx pollution inside vehicles, so measure to promote walking and cycling to school will be beneficial to this group.</p> <p>Measures to improve safety and security on the transport network, including at night and on public transport, are expected to be beneficial for younger people. Similarly, a reduction in crime and anti-social behaviour is also expected to be particularly beneficial to older people who may be otherwise deterred by this.</p> <p>A key element of the Strategy is to reduce the use of private cars and re-purpose the kerbside to provide for other uses, such as cycle parking. As older people are more likely to be car owners there may be a slight negative impact on this group. However, this is expected to be outweighed by broad health and accessibility benefits delivered by the strategy, including improved access to public transport services (e.g. through the provision of step-free access at stations) and enhancements to the wider public realm (e.g. the provision of public seating).</p>
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DISABILITY

<p>Details of impacts identified</p>	<p>Improving physical accessibility and removing barriers to people with disabilities is a key theme of the LTTS. There is a significant journey time 'penalty' at present for those relying on rail and underground services who need step free access. This is considered likely to be a deterrent to travel with the resulting impact of a narrowing of opportunity for economic and social activity with potential consequences for physical and mental well-being. Key priorities within the strategy include securing step free access at stations across the borough and delivering public realm improvements to provide safe, welcoming and legible street environments for people with disabilities. Similarly, increased priority for pedestrians, including extended crossing time, will also benefit people who may need more time to cross the road comfortably.</p> <p>The LTTS also includes targeted services and campaigns to increase participation in sustainable travel by people with disabilities, including bus ridership and inclusive cycling initiatives. This is a particular priority as disabled people may suffer from higher mortality rates than the general population, potentially reflecting exclusion from active travel / lifestyles. The updated strategy reinforces the need to prioritise car parking for people with disabilities and provide adequate kerbside space for this purpose. The renewed focus on engagement identified in the LTTS are also expected to lead to a better representation of people with disabilities in the decision making process.</p>
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RACE

Details of impacts identified	<p>Brent is the second most ethnically diverse borough in London - 64% of the local population is from Black, Asian and other minority groups and over 149 different languages are spoken. However, BAME groups are typically over-represented in indices of deprivation and more likely to be exposed to transport related harmful impacts, such as traffic collisions and poor air quality and health inequalities related to inactive lifestyles.</p> <p>Measures in the LTTS aimed at improving road safety, reducing traffic congestion and promoting active travel will provide significant benefits to all groups, although more targeted educational and training initiatives to promote active travel among certain under-represented groups, including BAME groups, and to ensure that such groups are better represented in the decision making process more generally, may be required.</p>
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SEX

Details of impacts identified	<p>Women and girls are often less likely to walk and cycle than their male counterparts, with concerns over confidence, road safety, lack of adequate facilities and personal security often cited as key reasons for this. The provision of accessible, well connected and safe/secure walking and cycling routes, along with road safety education/cycle training will benefit all groups, but particularly women.</p> <p>Safety and security on public transport and at stations is also a concern for women who often feel vulnerable to attack. In this regard, improved public realm and lighting along access routes to public transport are likely to have a positive impact on safety and perceived safety and will figure prominently in transport improvement schemes.</p> <p>Improving physical access to the public transport network (e.g. through the provision of step free access at stations) will benefit all groups, but particularly parents / carers.</p>
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SEXUAL ORIENTATION

Details of impacts identified	<p>Similar to women and people who are going or have gone through gender reassignment, members of the LGBT community often find personal safety and security to be a concern – particularly on public transport. By working closely with TfL, transport operators, the police and local communities, we aim to reduce crime and anti-social behaviour on the transport network, benefiting all groups, but particularly those who may be more vulnerable to this risk.</p>
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PREGANCY AND MATERNITY

Details of impacts identified	<p>Improving physical access to public transport (e.g. through providing step-free access to stations) and the public realm more generally is expected to have a positive impact for this group as it will improve accessibility and create more welcoming places. Improvements to air quality are also expected to have a positive impact, particularly in relation to the health of unborn children for whom exposure to poor air quality has been identified as a particular issue. The implementation of more 'people friendly' street environments through programmes such as Healthy Neighbourhoods are expected to have a positive impact for this group.</p>
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RELIGION OR BELIEF

Details of impacts identified	<p>Mesures to improve personal safety/security and to tackle crime and anti-social behaviour on the transport network will likely benefit different faith groups in much the same way as other target groups.</p>
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GENDER REASSIGNMENT

Details of impacts identified	<p>Similar to women and those from different religious groups or the LGBT community, people who are going or have gone through gender reassignment, often find personal safety and security to be a concern – particularly on public transport. By working closely with TfL, transport operators, the police and local communities, we aim to reduce crime and anti-social behaviour on the transport network, benefiting all groups, but particularly those who may be more vulnerable to this risk.</p>
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MARRIAGE & CIVIL PARTNERSHIP

Details of impacts identified	<p>There is no evidence to suggest that people from this protected characteristic will be disproportionately affected (either positively or negatively).</p>
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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?

Subject to Cabinet approval, the LTTS is scheduled to undergo consultation during Spring 2022. A communication and engagement plan has been developed to include a combination of interactive, online engagement via Citizen Lab, as well as more traditional face to face exhibitions at key visitor attractors such as markets, places of worship, community/sport centers and such places where harder to reach groups can be actively engaged. Further engagement will be undertaken via the Brent Active Travel and Public Transport Forum which includes representatives of disabled, youth, older persons and other groups in the borough.

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

The proposals contained within the LTTS have to be seen in the wider context of policies and strategies. Each objective can only be acted upon and implemented through a series of individual schemes. Designs will take into account needs for all users, this includes formal safety audits and assessment against the checklist for measures provided by the Royal National Institute for the Blind (RNIB).

All schemes set in the public highway will be consulted on. Should there be any aspects of individual schemes that have potential to disproportionately or negatively impact on individuals or groups of protected characteristics then these can be addressed through the public consultation stage of the scheme.

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

It is anticipated that through ongoing engagement with a range of groups/stakeholders and adherence to relevant guidance/standards, at all stages of project/scheme development, will ensure any negative impacts are removed, or mitigated.

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

Monitoring of the delivery of the LTTS will be undertaken by the Transportation Planning Team, with regular meetings to be held with those responsible for the delivery of the various projects and initiatives outlined in the High Level Delivery Plan, with progress towards the various targets and indicators reported each year.

A mechanism for monitoring and evaluating the impact of specific schemes and initiatives in delivering the various LTTS objectives and priorities will be established. This will include details of the range of monitoring data that will be required to be collected before, during and after scheme implementation.

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 Brent Long Term Transport Strategy (LTTS) provides the strategic direction for investment in transport in Brent, with the overarching aim of improving transport options for all and to reduce the negative impacts of travel on the borough. However, the LTTS does not sit in isolation, but is closely aligned with a wide range of National, Mayoral and borough plans and strategies. These include the London Plan; the Mayor of London's Transport Strategy (MTS); the Borough Plan; the Brent Climate and Ecological Emergency Strategy; the Brent Inclusive Growth Strategy; and the emerging Brent Local Plan. Accordingly, many of the objectives and measures contained within the LTTS are designed to meet multiple priorities and objectives, some of which will have varying degrees of impact – both positive and negative - on our diverse communities.

Following assessment, it is considered that, on balance, the significant benefits that the objectives and measures within the LTTS will bring, including those to protected characteristics, will significantly outweigh the disbenefits to these groups. However, where negative impacts have been identified, it is anticipated that these can be addressed, or mitigated, as projects and schemes are further developed. A requirement to engage closely with local communities, our partners and a wide range of stakeholders at all stages of project development will ensure this.

On this basis, it is recommended that the LTTS continues, but is kept under regular review.

SECTION D – RESULT

Please select one of the following options. Mark with an "X".

A	CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED	
B	JUSTIFY AND CONTINUE THE POLICY/PROPOSAL	X
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
<p>Improve involvement and consultation with different equality groups</p>	<p>The draft LTTS will undergo public consultation during Spring 2022. Feedback from a wide range of stakeholders/community groups will be sought, including those with protected characteristics, with the results fed into the development of the final version of the strategy to be produced in Summer 2022.</p> <p>More regular dialogue/ engagement (including through groups such as the Active Travel and Public Transport Forum) will help ensure key issues/ concerns are taken on board when developing/ implementing transport schemes.</p>	<p>Transport Planning/ Highways & Infrastructure</p>	<p>Ongoing</p>
<p>Monitor, evaluate and review Equality Analysis annually</p>	<p>Ongoing monitoring and regular review in partnership with stakeholders/user groups will help ensure relevant issues are being addressed and determine the effectiveness of policies/ measures.</p>	<p>Transport Planning</p>	<p>December 2022</p>

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Annekatriin Dennemann
REVIEWING OFFICER:	Tim Martin
HEAD OF SERVICE / Operational Director:	Gerry Ansell/ Alice Lester