

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	Staples Corner Design Code
DEPARTMENT:	Spatial Planning
TEAM:	Urban Design
LEAD OFFICER:	John Stiles/Zivile Volbikaite
DATE:	21/07/2023

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 Staples Corner Design Code is a set of concise, measurable and illustrated design requirements for new development coming forward in and around the Staples Corner Growth Area, as designated in the Brent Local Plan 2019-2041. As a standalone document, it will provide landowners, developers, design teams and council officers with greater certainty about how development proposals should come forward in lieu of the forthcoming Staples Corner Masterplan Supplementary Planning Document SPD, which is currently in development. Its content expands upon existing Local Plan Policy BEGA2A, and does not create new policy.

Initiative: Industrial Intensification and Consolidation with Residential Co-location

Objective: The primary objective is to support the delivery of industrial intensification and consolidation with residential co-location in the Staples Corner area.

Intended Results: The aim is to create at least 2,200 new homes and address the challenges facing the area by embedding biodiversity net gain, climate change mitigation, and health and well-being improvements within the design code. The design code is expected to deliver consistent design quality and provide a robust framework for assessing development schemes during the planning process.

Initiative: Addressing Challenges and Improving Connectivity

Objective: Address issues of high car dependency, low land values, severance by major roads, low-density industrial land, and poor-quality cycling infrastructure.

Intended Results: Improve connectivity, reduce severance, and enhance the quality of public spaces. Active transport improvements, such as walking and cycling infrastructure, are key components of addressing these challenges.

Initiative: Place-based Recovery and Green-led Approach

Objective: Foster a green-led and place-based recovery in Brent, particularly in response to health and socio-economic impacts, including the Covid-19 pandemic.

Intended Results: Promote sustainable development, enhance biodiversity, mitigate climate change, and improve the overall health and well-being of the community. The design code is expected to align with the ambitions outlined in the recently adopted Local Plan.

Overall, the objectives of the initiatives above are to promote sustainable development, improve connectivity and public spaces, deliver new homes, and create a resilient and vibrant community in the Staples Corner area. The intended results include enhanced design quality, long-term planning certainty, and positive socio-economic and environmental outcomes.

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

The Design Code will affect the range of people who invest, live, work or visit Staples Corner area. This includes the following groups and organisations:

Residents: The Design Code could have an impact on residents living in the Staples Corner area and the surrounding neighbourhoods. The introduction of industrial intensification, consolidation with residential co-location, and the development of new homes may affect the local housing market, community dynamics, and quality of life for residents.

Businesses: Elements of the Design Code may have implications for businesses operating within the Staples Corner Growth Area, including industrial, distribution, and wholesale businesses. Changes in land use, development guidelines, and infrastructure improvements could affect their operations, access to facilities, and future growth prospects.

Landowners: Landowners in the Staples Corner area may be affected. Changes in land use, development regulations, and opportunities for redevelopment could influence the value and potential use of their properties.

Local Authorities: The Design Code could impact the local authorities responsible for planning and development in Brent and the neighbouring London Borough of Barnet. They would be involved in the implementation and enforcement of the design code, as well as coordinating infrastructure improvements and addressing any regulatory changes.

Community Organisations and Stakeholder Groups: Community organisations, resident associations, and stakeholder groups that represent the interests of the local community may be affected by the Design Code. Their input and involvement in the development and implementation of the Design Code and masterplan could shape the outcomes and ensure that the community's needs and concerns are considered.

Transport and Infrastructure Providers: Organisations responsible for transport infrastructure, such as Transport for London (TfL), National Highways, and Network Rail, could be impacted by the proposed improvements in connectivity and public realm. They may need to coordinate their efforts to align with the objectives of the Design Code and ensure effective integration of transportation systems.

Environmental Organisations: The Design Code's focus on biodiversity net gain, climate change mitigation, and green-led recovery could involve collaboration with environmental organisations. These organisations could provide expertise and guidance on sustainable practices, ecological conservation, and achieving environmental objectives.

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 document seeks to secure a range of measures to positively address any potential harm caused by new development to the environment. It will create a high quality and healthy environment that will maximise benefits to occupants and the local area and community. It is likely to benefit most occupants, workers, visitors, and developers who principally will benefit from an improved environment and cost-effective developments in the future. The Design Code correlates with all protected characteristics.

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
<p>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.</p>		

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 'Equality Profile of Brent March 2019' and 'Community profiling: diversity in Brent – evidence pack to inform 2021 Census planning and engagement March 2021' has been used to determine proportions of those with protected characteristics in the borough. This has been used together with a judgement of qualified planning professionals with a history of training on equalities and understanding how different aspects of policies or actions can impact on those with protected characteristics to determine the range of impacts.

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>The Design Code includes a set of concise, measurable and illustrated design requirements for new development coming forward in and around the Staples Corner Growth Area. The developments that come forward will benefit all of those who live, work and visit the Growth Area and the wider area. The long-term benefits of which will have a positive impact on the younger and older residents. Such as,</p> <ul style="list-style-type: none"> • sustainable requirements could reduce the cost of heating and servicing homes. This may benefit the elderly, specifically those on lower incomes who are more likely to suffer fuel poverty. • cleaner and greener transport infrastructure are likely to benefit all those without access to a motor vehicle. • Good quality open spaces and effective greening will improve environment and encourage people of all age to use them.
SEX	
Details of impacts identified	<p>The Design Code includes a set of concise, measurable and illustrated design requirements for new development coming forward in and around the Staples Corner Growth Area. The developments that come forward will benefit everyone that live, work, and visit the area.</p>
RACE	
Details of impacts identified	<p>64% of Brent’s residents are BAME, the 3rd highest in London. These groups are often disproportionately deprived when compared with other racial groups. Lower incomes mean a higher prevalence on cheaper forms of accommodation. They will therefore benefit from improved standard of accommodation that the Desing Code seeks to ensure.</p>

DISABILITY	
Details of impacts identified	The guidance may have a positive impact upon residents with disabilities as developers may choose to achieve Homes Quality Mark and other standards that will provide good quality and accessible accommodation equally to those people with disability. Improved air quality and greening will assist in improving health and well being.
SEXUAL ORIENTATION	
Details of impacts identified	The Design Code includes a set of concise, measurable and illustrated design requirements for new development coming forward in and around the Staples Corner Growth Area. The developments that come forward will benefit everyone that live, work and visit the area.
PREGANCY AND MATERNITY	
Details of impacts identified	The Design Code includes a set of concise, measurable and illustrated design requirements for new development coming forward in and around the Staples Corner Growth Area. The developments that come forward will benefit everyone that live, work and visit the area.
RELIGION OR BELIEF	
Details of impacts identified	The Design Code includes a set of concise, measurable and illustrated design requirements for new development coming forward in and around the Staples Corner Growth Area. The developments that come forward will benefit everyone that live, work and visit the area.
GENDER REASSIGNMENT	
Details of impacts identified	The Design Code includes a set of concise, measurable and illustrated design requirements for new development coming forward in and around the Staples Corner Growth Area. The developments that come forward will benefit everyone that live, work and visit the area.
MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	The Design Code includes a set of concise, measurable and illustrated design requirements for new development coming forward in and around the Staples Corner Growth Area. The developments that come forward will benefit everyone that live, work and visit the area.

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?

Recruitment of the Staples Corner Community Champions for the engagement process took place at project initiation. The Staples Corner Community Champions group consists of 25 individuals who live, work, run businesses, or own property in Staples Corner and the surrounding area. These individuals were selected to provide input and steer the development of the design code and, potentially, the masterplan. The recruitment process, selection criteria, and demographics of the Community Champions group were evaluated by external consultants in relation to the broader population of Brent borough. Additional methods for the engagement strategy, such as outreach efforts, methods used to recruit and engage marginalised groups, and efforts to include various perspectives, were also relevant in determining the representativeness of the engagement process.

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

The document is based on the policies set out in the Brent Local Plan, and the London Plan. These documents have gone through significant and rigorous scrutiny, both by the Council, residents, and other stakeholders. As such, it is considered that the Design Code as a result is based on a robust and evidence based approach, and therefore does not require any further evidence.

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

No applicable.

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

The impact of the Design Code will be assessed by monitoring the policies in the Local Plan and through the annual Authority Monitoring Report.

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.

In conclusion, the Staples Corner Design Code provides a set of concise, measurable and illustrated design requirements for new development coming forward in and around the Staples Corner Growth Area. It supports implementation of policy BEGA2A of the adopted Brent Local Plan and is in accordance with the London Plan. The Design Code will assist the Council in securing better quality residential development and industrial intensification improving the borough's environment and tackling climate change. This will positively impact upon a range of protected characteristics, helping to reduce inequalities for Brent residents in and around the Growth Area and consequently the quality of life generally for all.

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
Determine applications in accordance with the Design Code .	Improved environment and development meeting policy requirements in London and Local Plan.	Development Management Officers, Planning Policy Officers, Urban Design Officer, Transport Officers and Environmental services	On-going

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	John Stiles
REVIEWING OFFICER:	Ciara Whelehan
HEAD OF SERVICE:	Gerry Ansell