

## Appendix 2 - 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 (updated December 2022 & November 2024)

*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, the Council secured planning permissions for mixed-use schemes on the Cecil Avenue and Ujima House sites. The Cecil Avenue detailed scheme for 250 new homes, with family 3 and 4 bedroom homes, c3,400sqm commercial and community floorspace, and a publicly accessible landscaped courtyard. The Ujima House outline scheme 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.

In March 2023, following a competitive procurement, the Council and Wates entered a Development Agreement to redevelop the Cecil Avenue and Ujima House sites. Detailed design and planning to meet latest building and fire regulations has reduced the Cecil Avenue scheme to 237 new homes (37% affordable housing), whilst the Ujima House scheme remains at 54 homes (100% affordable housing). Both schemes are funded by the Mayor of London and are delivering more affordable housing than the 35% secured under the original planning permissions. In April 2024, Cabinet approved use of Community Infrastructure Levy to fund a new publicly accessible courtyard garden and fully fitted out community centre.

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, commercial and community space, 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, infrastructure and unlock regeneration opportunities to revitalise the eastern stretch of Wembley High Road.

The schemes will deliver 141 affordable homes (50% affordable housing on a habitable room basis), including larger 3 and 4 bedroom family homes, wheelchair adaptable and accessible homes, and London 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 commercial space, intended to provide space for existing Brent businesses, attract new businesses to the borough, and generate income for the council. The construction contract and programme itself provides opportunities for social value, employment and the local supply chain.

The Ujima House scheme has specifically affected Meanwhile Space tenants that previously occupying the former office 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 has worked 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 is providing new homes, commercial business space, 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 London Affordable Rented housing to alleviate pressure on the Council's housing register, including for larger families and disabled people.
- New commercial space – as landowner the Council has some control over which businesses will occupy the workspace, and will seek to promote local employment.
- New community facility –expected to meet diverse local community needs.
- Publicly accessible courtyard – designed and secured under planning to be open, inclusive and publicly accessible to the local community.

- Construction contract social value, employment and local supply chain benefits.

As per planning policy, 10% new homes will be wheelchair adaptable or accessible, across all unit sizes and tenures. 141 new homes across the schemes will be affordable housing (50% on a habitable room basis), with London Affordable Rented homes available to people on the Council's housing waiting list. 25 disabled parking spaces can be provided 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		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><b>If you have answered YES to ANY of the above, then proceed to section B.</b>  <b>If you have answered NO to ALL of the above, then proceed straight to section D.</b></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.

Many households in London already require accessible or adapted housing in order to lead dignified and independent lives. In addition, Londoners are living longer and with the incidence of disability increasing with age, older people should have the choice of remaining in their own homes rather than moving due to inaccessible accommodation.

London Plan (2021) Policy D7 for Accessible Housing to address these and future needs and provide suitable housing and genuine choice for London's diverse population, including disabled people, older people and families with young children, is that residential development must ensure that:

- 1) at least 10 per cent of dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(3) 'wheelchair user dwellings'
- 2) all other dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.

For Cecil Avenue

Local Planning Authority (24/1515) approved:

10% (24 dwellings) meet Building Regulations Part M4(3) (wheelchair user dwellings) including 5 dwellings designated as M4(3) compliant within the London Affordable Rent tenure constructed in accordance with M4(3a) compliant floorplans. 81% (193 dwellings) meet Building Regulations Part M4(2) (accessible and adaptable dwellings).

9% (20 dwellings) are stacked 4 bedroom family maisonettes.

For Ujima House

10% (6 dwellings) meet Building Regulations Part M4(3) (wheelchair user dwellings) 90% (48 dwellings) meet Building Regulations Part M4(2) (accessible and adaptable dwellings).

Within LB Brent, there are communities who tend to have larger family sizes. 4 bedroom homes have been included within the scheme to reflect this need, concentrated within the London Affordable Rented homes tenure.

Redevelopment of Ujima House affected Meanwhile Space and their tenants, who include Stonebridge Boxing Club and Yaseen Youth Club, which provide services to young people. Officers worked 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 Council has made arrangements for the Stonebridge Boxing Club and Yaseen Youth Tours to lease alternative council-owned premisses elsewhere in the borough.

The Cecil Avenue and Ujima House development schemes provide a significant amount of commercial and community space (c4,000sqm) proposed to be retained by the Council together with a publicly accessible courtyard. The commercial space 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.

The new community centre and public courtyard at Cecil Avenue are integral to the Wembley Housing Zone vision for regeneration and place-making, and will provide social infrastructure to support growth and development in the local area. The opportunity is to deliver inclusive and accessible spaces able to meet the diverse range of local community needs, including for disadvantaged groups, and to foster positive interaction and good relations between different groups.

- 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>	<p>Positive – New larger affordable family homes will help accommodate people on the Council housing waiting list and diverse communities within Brent with larger families, including both young and old people.</p> <p>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. (Note successful council mitigation through arrangements to lease alternative council-owned premises elsewhere in the borough).</p>
<b>DISABILITY</b>	
<b>Details of impacts identified</b>	<p>Positive – 17% larger family housing and 10% of the homes will be wheelchair adaptable or accessible, with disabled parking facilities.</p>
<b>RACE</b>	
<b>Details of impacts identified</b>	<p>Positive – there are 50 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> <p>Wates are delivering a social value package for at least 10% of the contract value, including construction supply chain spend with Brent-based SMEs, and training, apprenticeship and employment opportunities for local people from BAME backgrounds.</p>
<b>SEX</b>	
<b>Details of impacts identified</b>	Positive - Workspace will target employment opportunities, training and support for female 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
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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?

4 public consultation events were held in advance of the original 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 were 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 publicly accessible courtyard.

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

A presentation focusing on the publicly accessible areas of the Wembley Housing Zone scheme was given to the Brent Disability Forum March 2024.

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

Following Cabinet April 2024 approved use of Community Infrastructure Levy to fund a new publicly accessible courtyard garden and fully fitted out community centre, public engagement is planned for the first half of 2025, to better understand local community needs, and inform specification and operational briefs for these spaces.

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

For the Cecil Avenue scheme 9% of the new homes (20 no.) do not meet M4(3) or M4(2) criteria, due to their provision as stacked maisonettes and the cost of providing a lift to these units being prohibitive and would increase service charges. However, 24 homes meet the M4 (3) criteria per London Plan policy, and all remaining 193 homes are M4(2) compliant.

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



The proposals are that the affordable homes, commercial and community elements of the schemes will be retained by the Council. London 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 have increased 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 commercial space 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.

The new community centre and publicly courtyard at Cecil Avenue will provide important social infrastructure and the opportunity to deliver inclusive and accessible spaces that can meet a range of diverse local needs.

Wates are delivering a social value package for at least 10% of the contract value, including construction supply chain spend with Brent-based SMEs, and training, apprenticeship and employment opportunities for local people from BAME backgrounds.

Notwithstanding Meanwhile Space lease and their tenant's occupation of Ujima House was always temporary in advance of the building being redeveloped, Officers will 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. The Council has notably made arrangements for the Stonebridge Boxing Club and Yaseen Youth Tours to lease alternative council-owned premises elsewhere in the borough.

## 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>	

## 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.

<b>Action</b>	<b>Expected outcome</b>	<b>Officer</b>	<b>Completion Date</b>
<p>Ensure that the Council and/or the developer consult with Brent Disability Forum group during detailed designs stage.</p> <p>Matter to be picked up with partner developer moving forward (12/2022)</p> <p>Presentation to Brent Disability Forum 3/2024 (11/2024)</p>	<p>Optimise physical access to and within buildings and open spaces for disabled people.</p>	<p>Head of Regeneration</p>	<p>CLOSED (11/2024)</p>
<p>Assist Meanwhile Space to find alternative suitable premises for Ujima House tenants, if requested.</p> <p>Meanwhile Space (MS) lease expires 15/12/2022. MS were assisted (e.g. signposting) to find alternative suitable premises for their tenants MS tenants Stonebridge Boxing Club and Yaseen Youth Tours still occupy Ujima House. The Council continues to seek to assist them in finding alternative premises. (12/2022)</p> <p>The Council has made arrangements for the Stonebridge Boxing Club and Yaseen Youth Tours to lease alternative council-owned</p>	<p>Service providers at Ujima House can continue operating in the area.</p>	<p>Regeneration Officer</p>	<p>CLOSED (11/2024)</p>

premisses elsewhere in the borough. (11/2024)			
Review procurement, disposal and leasing options for the commercial space on 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.	Principal Regeneration Officer	OPEN
Public engagement to better understand local community needs, and inform specification and operational briefs for a new publicly accessible courtyard garden and fully fitted out community centre to be funded by SCIL.	Inclusive and accessible spaces designed, built and operated to meet diverse local community needs.	Principal Regeneration Officer	OPEN
Monitor Wates Social Value commitments	Maximise opportunities and impact for local residents, businesses and communities	Principal Regeneration Officer	OPEN

## 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 [July 2021 (updated December 2022 & November 2024)]