

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	Brent Local Implementation Plan (LIP) Three-Year Delivery Plan: 2025/26 – 2027/28
DEPARTMENT:	Planning and Development Service
TEAM:	Transportation Planning
LEAD OFFICER:	Tim Martin
DATE:	07.04.2025

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 primary source of funding for schemes and initiatives to improve transport infrastructure and travel choices in Brent is Local Implementation Plan (LIP) funding, allocated through Transport for London (TfL). LIPs set out how London boroughs will deliver better transport in their area, in the context of borough priorities, the overarching Mayoral aim for 80% of journeys to be made by sustainable modes and Transport Strategy outcomes to deliver 'Healthy Streets and Healthy People'.

In November 2024, in line with current Mayoral guidance, the Council prepared and submitted a three-year LIP Delivery Plan for the period 2025/26 – 2027/28 to TfL. This included proposals for a range of small to medium sized schemes and interventions under TfL's existing Safer Corridors and Neighbourhoods, Bus Priority, and Cycling programmes; but also outlined proposals for more comprehensive schemes under two new programmes - Borough Safer Streets and Better Bus Partnership.

The LIP Delivery Plan includes schemes/interventions identified through several sources, including TfL evidence-led datasets, analysis of borough collected data and stakeholder engagement. It also includes schemes linked to development activity and schemes that support Council and TfL objectives. In line with current TfL LIP Guidance, there is a specific focus on implementing new, high impact schemes that balance delivery across various modes of active, sustainable transport, core MTS outcomes, and which can be delivered at pace.

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

The various measures within the LIP Delivery Plan will affect all Brent residents, businesses and those people who work, study, visit or just pass through the borough. However, the nature and extent of 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.

Underpinning the LIP Delivery Plan are the principal goals of increasing journeys by walking, cycling and public transport whilst reducing the number of journeys made by private vehicles; and to achieve the Vision Zero ambition of nobody being killed or seriously injured on our roads. This is in line with the aims/objectives of the Brent Long Term Transport Strategy (LTTTS) and the Mayor's Transport Strategy for London (MTS). Other important priorities include:

- Mitigating the impacts of traffic on the environment and our communities and creating healthier, more resilient and more welcoming streets and places – in line with the objectives of our Climate & Ecological Emergency Strategy, Air Quality Action Plan and Joint Health & Wellbeing Strategy.
- Securing transport improvements vital for delivering new housing and jobs and to connect our diverse communities – in support of our growth ambitions as set out in our Inclusive Growth Strategy and Local Plan.

LIP Delivery Plan Measures/Interventions

At a broad level, it is anticipated that the various LIP Delivery Plan 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 and making our streets safer and more inclusive for walking and cycling will benefit all groups, but particularly the very young and the elderly, those with disabilities, women and certain ethnic minority groups. In particular, interventions aimed at reducing car dominance and putting the needs of pedestrians and cyclists first will particularly benefit the young and certain ethnic minority groups who are involved in a disproportionate number of road collisions. The same measures will also benefit the very young and the very old and certain ethnic minority 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, providing our residents with access to appropriate support, training and equipment to help people walk and cycle will benefit all groups, but will particularly benefit the very young and and certain ethnic minority groups.
- Measures aimed at 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 enhancing personal safety/security will particularly benefit the elderly and women.
- A particular focus is on improving access by public transport, cycling and walking 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 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 LIP Delivery Plan. 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 LIP Delivery Plan 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 LIP Delivery Plan 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 LIP Delivery Plan 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
Age	X		X
Sex	X		
Race	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

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.

Brent currently experiences a range of transport and related problems, many of which are interlinked. These include long-standing issues around congestion, poor air quality and road safety - which continue to blight some of our most vulnerable communities. In addition, there is a pressing need to secure a healthier, more sustainable and more inclusive future for all those who live, work or visit the borough.

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 interventions/actions contained in the LIP Delivery Plan.

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 around half of NO_x emissions and one-third 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.
- Reducing motor vehicle dominance and facilitating the uptake of walking and cycling 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.

Health and Wellbeing

- 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 walking and cycling, 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 walking, wheeling and cycling routes 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.

- Among the schemes in the LIP Delivery Plan which could benefit residents include a range of 'Healthy Streets' corridor improvements, which will significantly improve conditions for pedestrians and cyclists across the borough; the provision of new/improved cycle parking facilities; and adult and school cycle training.

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 LIP Delivery Plan.

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 LIP Delivery Plan include reducing motor vehicle dominance and reallocating road space to walking and cycling. Whilst these are all considered essential measures if we are to achieve our overarching targets, some of these are likely to have implications for groups such as the elderly or disabled, particularly if they do not have the opportunity or ability to travel by means other than car.

Congestion

- Whilst road traffic volumes in Brent have decreased slightly in recent years with the number of vehicle kilometers travelled on the borough road network falling from a high of 1.008 billion in 2016 to 962 million in 2022, 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 trips by active modes. For example, half of all car journeys in Brent are less than 5km and could be easily walked or 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 within certain ethnic minority groups. Addressing such barriers would particularly benefit people of all ages, disabled groups, and certain ethnic minority groups.

Connectivity/Accessibility

- The borough's active travel network is very fragmented, 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 walk, wheel or cycle more. Proposals for improvements to the walking and cycling network would greatly benefit borough residents, particularly those more isolated groups, such as the elderly and disabled.
- Crowded and obstructed streets, narrow footways and cycle lanes, and damaged or poorly maintained roads and pavements are among the most common complaints cited by people walking and cycling. Such issues are often magnified when experienced by those with disabilities. Measures to improve the accessibility and inclusiveness of our streets for those walking and cycling, such as through reviewing arrangements around pavement parking; removing sources of pavement clutter and footway obstructions; and implementing timely carriageway and footway repairs and resurfacing, will benefit people of all ages and disabled 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 facilitate an increase in walking and cycling 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 school are exposed to higher levels of harmful particulates and NOx pollution inside vehicles, so measure to promote walking, wheeling and cycling to school will be beneficial to this group.</p> <p>Measures to improve safety and security on our streets, including at night, 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 aim of the LIP Delivery Plan 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/users 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 plan, including improved access to public transport</p>
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	services (e.g. through the provision of accessible bus stops) and enhancements to the wider public realm (e.g. the provision of public seating).
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DISABILITY

Details of impacts identified	<p>Improving physical accessibility and removing barriers to people with disabilities is a key theme of the LIP Delivery Plan. There is often a significant journey time 'penalty' at present for those with disabilities. 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 plan include 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 plan also proposes targeted services and campaigns to increase participation in sustainable travel by people with disabilities, including 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 renewed focus on engagement identified in the plan are also expected to lead to a better representation of people with disabilities in the decision making process.</p> <p>A key aim of the LIP Delivery Plan is to reduce the use of private cars and re-purpose the kerbside to provide for other uses, such as cycle parking. As some people with disabilities are more likely to be car owners/users 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 plan, including improved access to public transport services (e.g. through the provision of accessible bus stops). In addition, individual scheme designs will take into account needs for people with disabilities, this includes assessment against the checklist for measures provided by the Royal National Institute for the Blind (RNIB).</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, certain ethnic minority 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>
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	Measures in the LIP Delivery Plan 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 certain ethnic minority groups, and to ensure that such groups are better represented in the decision making process more generally, may be required.
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SEX

Details of impacts identified	<p>Women and girls are often less likely to walk, wheel 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 cycle routes, along with road safety education/cycle training will benefit all groups, but particularly women.</p> <p>Safety and security on our streets is also a concern for women who often feel vulnerable to attack. In this regard, improved public realm and lighting are likely to have a positive impact on safety and perceived safety and will figure prominently in transport improvement schemes. The Council is also committed to undertaking women's safety audits when developing future transport and public realm improvement schemes in the borough.</p>
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SEXUAL ORIENTATION

Details of impacts identified	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 when travelling alone or at night. By working closely with TfL, the police and local communities, we aim to reduce crime and anti-social behaviour on our streets, benefiting all groups, but particularly those who may be more vulnerable to this risk.
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PREGANCY AND MATERNITY

Details of impacts identified	Improving physical access to public transport (e.g. through bus stop accessibility improvements) 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 pregnant people and fetuses 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.
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RELIGION OR BELIEF

Details of impacts identified	Mesures to improve personal safety/security on our streets will likely benefit different faith groups in much the same way as other target groups.
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GENDER REASSIGNMENT

Details of impacts identified	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. By working closely with TfL, the police and local communities, we aim to reduce crime and anti-social behaviour on our streets, benefiting all groups, but particularly those who may be more vulnerable to this risk.
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MARRIAGE & CIVIL PARTNERSHIP

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

Schemes included in the LIP Delivery Plan will have non-statutory and any necessary statutory consultation completed as part of the planning, design and delivery process. In addition, larger schemes will also be subject to more in depth, creative community engagement to ensure that schemes provide the full range of benefits to those areas in which they are introduced. Where objections and/or representations are received and they cannot be resolved or removed through further design changes and achieved within funding available, these will be referred to Cabinet for further consideration.

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

The measures and interventions contained within the LIP Delivery Plan have to be seen in the wider context of policies and strategies such as the Brent Long Term Transport Strategy and the Mayor's Transport Strategy for London. Individual scheme 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 group of protected characteristic then they 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 LIP Delivery Plan 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, with progress reported to TfL on a regular basis.

A mechanism for monitoring and evaluating the impact of specific schemes and initiatives in delivering the various plan priorities will be established. This will include details of monitoring data that will be required to be collected before, during and after scheme implementation. EIAs will be undertaken on larger schemes, where appropriate.

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.

Following assessment, it is considered that, on balance, the significant benefits that the objectives and measures within the LIP Delivery Plan will bring, including those to protected characteristics, will significantly outweigh the negative impacts 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. EIAs will be undertaken on larger schemes, where appropriate.

On this basis, it is recommended that the LIP Delivery Plan is implemented, 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
Improve involvement and consultation with different equality groups	More regular dialogue/engagement (including through groups such as the Active Travel Forum) will help ensure key issues/concerns are taken on board when developing/ implementing transport schemes.	Transport Planning Manager; Head of Healthy Streets & Parking	Ongoing
Monitor, evaluate and review Equality Impact Analysis annually	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.	Transport Planning Manager; Head of Healthy Streets & Parking	April 2026

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Tim Martin – Transportation Planning Manager	Signature:  Date: 23/04/2025
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REVIEWING OFFICER:	Paul Lewin – Spatial Planning Manager	Signature: Date:
HEAD OF SERVICE:	David Glover – Head of Planning and Development	Signature: Date:
OPERATIONAL DIRECTOR:	Gerry Ansell – Director Inclusive Regeneration and Climate Resilience	Signature: Date: