

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	Air Source Heat Pump at Willesden Green Library
DEPARTMENT:	Property & Assets
TEAM:	Energy Team
LEAD OFFICER:	Jakob Kupferberg
DATE:	26th September 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.

As part of the Energy Team's bid for Public Sector Decarbonisation Scheme Phase 4 (PSDS P4), government grant-funding has been secured worth £668K with additional match-funding to fund and deliver, among other projects, an Air-Source Heat Pump at Willesden Green Library.

The proposed works at the library will achieve three things:

1. Transfer the responsibility for heat and hot water production and management at the site back to the Council;
2. Reduce the Council's energy bills with measures funded by PSDS P4 expected to deliver annual energy bill savings of approximately £60-70k.
3. Support the decarbonisation of Brent's Corporate Estate in line with the Council's 2030 Net Zero target.

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

The residents at the residential development (Newman Close), who are also responsible for managing the Energy Centre, that currently provides heating to the Library, will be directly affected. The financial impact of this has not been determined as the Council does not hold the data it requires to make an accurate calculation.

A 6-week public consultation was carried out. This included two mailouts to Newman Close and two separate in-person resident consultation meetings (on Saturday 9th and Thursday 21st of August 2025 at the Library) as well as an online consultation form. The latter was

launched on haveyoursay.brent.gov.uk which the residents were invited to fill in and respond to via the mailouts sent to their addresses.

It is anticipated that the proposed works will not disrupt the daily operation of the Library. Employees and local users will continue to access the site as normal. While there may be occasional minor inconveniences during construction, these are expected to be minimal as most works will take place outside of operating hours. It is anticipated that the proposed works will not disrupt the daily operation of the Library. Employees and local users will continue to access the site as normal. While there may be occasional minor inconveniences during construction, these are expected to be minimal as most works will take place outside of operating hours.

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.

It is not expected that the proposal will create any equality implications under the Council's public sector equality duty. The majority of works will take place outside standard business hours, so there should be no disruption to the library's normal services or accessibility for staff and users. In the unlikely event of works taking place during normal hours, the impact is anticipated to be minimal and not affect regular use of the library.

While residents connected to the Energy Centre may be financially affected by the Council's exit from the heat network, extensive consultation and scenario analysis have been carried out to understand these impacts. The consultation showed strong resident preference for the Council and the Energy Centre to part ways, and the decision has been made in the wider interests of both the Council and the Borough.

No specific equality concerns have been raised through consultation, and no disproportionate impacts on protected groups have been identified as a result of this proposal.

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	
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

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.

In order to understand if the proposed works would impact people with protected characteristics, a formal public consultation has been undertaken. Whilst the majority of resident responses to the consultation have been in favour of the proposed decision for the Council to leave the Energy Centre and procure its own energy source, one resident did seem to suggest they believe a departure is not preferable, due to the potential for rising costs.

To mitigate potential rising costs, the Council has signposted residents to its free energy savings advice service ‘Brent Well and Warm’ at <https://london.greendoctors.org.uk/mailto:GreenDoctorsLDN@groundwork.org.uk>, as well as the ‘Heat Network Efficiency Scheme (HNES)’ which can help fund heat network optimisation studies and secure capital funding for works to undertake the improvement measures once a study has been completed.

The public consultation has involved two mailouts, two in-person resident meetings, setting up an email address to deal with any queries or concerns, an online public consultation form lasting 6 weeks and in total 5 responses (one by mail, 2 by email and 2 via the online submission form). The low response rate to the consultation may be due to indications that most flat owners reside abroad as well lack of awareness and understanding of different types of heating systems and arrangements.

In order to mitigate a low response turnout, the Council sent an initial letter detailing the proposed project and invitation to in-person resident meetings, and a follow up letter once again informing of the proposed project, inviting residents to the outstanding in-person meeting and the online public consultation. All proposed measures and options have been described in detail both at the in-person meetings through flyers and printouts and on the online consultation webpage, of which all residents have been invited to participate in. The public consultation has not established any impact by the proposed works to people with protected characteristics.

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	This project is not expected to have any negative or positive impacts on this group.
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DISABILITY

Details of impacts identified	This project is not expected to have any negative or positive impacts on this group.
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RACE

Details of impacts identified	This project is not expected to have any negative or positive impacts on this group.
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SEX

Details of impacts identified	This project is not expected to have any negative or positive impacts on this group.
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SEXUAL ORIENTATION

Details of impacts identified	This project is not expected to have any negative or positive impacts on this group.
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PREGANCY AND MATERNITY

Details of impacts identified	This project is not expected to have any negative or positive impacts on this group.
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RELIGION OR BELIEF

Details of impacts identified	This project is not expected to have any negative or positive impacts on this group.
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GENDER REASSIGNMENT

Details of impacts identified	This project is not expected to have any negative or positive impacts on this group.
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MARRIAGE & CIVIL PARTNERSHIP

Details of impacts identified	This project is not expected to have any negative or positive impacts on this group.
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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?

The protected characteristics apply to 1 of the respondents who are from a minority ethnic background, however, it was not concluded that the proposed works would impact this protected characteristic in any manner. For three of the responses, no Equalities Monitoring Form was submitted.

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

No areas requiring further data or analysis have been identified.

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

As there is no expectation of negative impacts, we cannot comment on the impact of the action plan on people with protected characteristics.

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

The relevant Brent project manager and senior officers leading on the project will monitor the situation and relationship with both the RTM and residents closely, as the project gets the full go-ahead and the installations of the proposed works commences. As part of the public consultation, which indicates the majority of residents taking part support the option of Brent Council leaving the Energy Centre and procuring its own heat source, the Council has sign posted residents at Newman Close (which includes the Director of the RTM) to suitable mitigating options such as free energy savings advice and the HNES which can help improve heat network efficiencies and lower any financial impact of the Council's exit from the Energy Centre.

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 planned proposal to install a heat pump at Willesden Green Library is expected to reduce the Council's costs, improve energy efficiency, lower carbon emissions and improve overall air quality in the area. Meanwhile, Brent Council has signposted residents at Newman Close to suitable mitigating options such as free energy savings advice service through 'Brent Well and Warm', as well as the Heat Network Efficiency Scheme (HNES) which can support in managing and mitigating the potential financial impact of the Council's exit from the Energy Centre.

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
Liaise with library managers	A carefully managed project delivery with minimal obstruction to normal library services and operations	Jakob Kupferberg	19 th June 2026
Liaise with senior and legal officers overseeing the situation with the RTM.	Achieve an amicable outcome in which Brent Council leaves the Energy Centre to install its own low-carbon heat source.	Jakob Kupferberg, Shawkat Kohestani, Tanveer Ghani, Neil Luscombe	19 th June 2026
Sign post residents and the RTM Director to free energy savings advice and external funding opportunities such as the Heat Network Efficiency Scheme.	Receive free energy savings advice and improve heat network efficiency and lower bills for residents.	Jakob Kupferberg, Neil Luscombe	9 th August 2025

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Jakob Kupferberg, Energy Projects Manager 26/9/2025 Jakob S. Kupferberg
REVIEWING OFFICER: <i>* the manager with oversight of the project</i>	Neil Luscombe, Energy Manager, 26/9/2025
HEAD OF SERVICE / Operational Director:	Russell Burnaby, Head of Facilities Management, 26/9/2025