

EQUALITY IMPACT ASSESSMENT (EIA)

POLICY/PROPOSAL:	South Kilburn District Heat Network
DEPARTMENT:	Neighbourhoods and Regeneration
TEAM:	Capital Delivery
LEAD OFFICER:	Neil Martin
DATE:	19/12/2025

EIA Guidance is available online, please reach out to equality@brent.gov.uk for any further support.

SECTION A – SCREENING

1. Briefly and clearly describe the policy, proposal, change, or initiative, and what it is trying to achieve.

A new district heat network for South Kilburn aims to complement the regeneration of the area, bringing opportunities, growth and jobs to the local population by supplying heating in a way that improves local air pollution and contributes less greenhouse gases to the planet.

This initiative is called the South Kilburn District Heat Network (SK DHN) and will generate low carbon heat for over 34 sites, while creating employment, apprenticeships and supporting targeted services for the 15 years of the contract. The SK DHN will generate heat based on electrically powered Air Source Heat Pumps 98% of the time paired with gas boilers for peak time and thermal storage. The hot water centrally generated will be pumped under streets to 34 sites in and around the South Kilburn Estate Regeneration, NW6. The network will be delivered, operated and maintained by a main contractor on behalf of the Council and the contract will be managed by officers in the Council.

With the South Kilburn District Heat Network, residents will have only one heating provider and will enter a Heat Supply Agreement in their name that would make them responsible for paying for the heating and hot water they use within their home. South Kilburn residents mostly live in communally heated properties and are already experiencing having one heating provider. There are few blocks currently occupied and individually heated but planned for demolition within the South Kilburn Estate Regeneration Masterplan and in the Single Delivery Partner procurement scope.

The South Kilburn District Heat Network will not directly provide heat metering and billing arrangements for all dwellings. The South Kilburn District Heat Network will provide bulk heat metering and billing to building. Residents will pay for heating and hot water based on their metered consumption and will be billed in a 'fair and transparent' manner based on their flat heat meter. Incoming regulations will hold accountable the South Kilburn District Heat Network main contractor for the network supplying bulk heat to each site and the building operator for the block level system transporting heat to tenants and leaseholders.

The 2,600 residential units will be billed by their building operators. Building operators vary across the South Kilburn Estate and include Brent Housing, Housing Associations and private block management agents appointed by developers. Where Brent will be the building operator of blocks with 100% social tenure, Brent will provide heat and billing arrangements to dwellings. In mixed-tenure blocks, Brent will review the heat supply agreements and service standards offered to dwellings from their building operators.

Under the Energy Act 2023, since April 2025 heat networks have been subject to regulations to ensure that heat customers enjoy the same consumer protections as those in gas and electricity markets. From January 2026, Ofgem will have the power to investigate and intervene where heat prices seem unfair.

Furthermore, the Energy Ombudsman will have the same powers to handle complaints and make legally binding decisions as they do for gas and electricity consumers. The heat metering and billing arrangements for all dwellings served by the SKDHN will meet the 'fair and transparent' requirements of the regulations.

Residents are not expected to see a change in their annual energy costs, as the SK DHN tariffs have been designed to ensure the overall energy costs do not exceed those at Unity Place. This analysis has included the costs of heating maintenance and other ancillary items that are typically paid for through a service charge in order to ensure a like for like comparison with the SK DHN, which includes those items within the tariffs.

2. Are there any groups who may be impacted by your proposal? For reference, Q4 lists all protected groups.

Officers analysed the demographic information available for the South Kilburn Estate area by the National Census. Officers recognise that there are indications that residents living in blocks served by the SK DHN include groups with protected characteristics. Officers also recognise that residents from protected characteristics groups may disproportionately be affected by household costs, like heating bills.

These groups include the elderly, very young children and persons with disabilities. These groups may require more heat in their homes to remain comfortable as their bodies may not be able to regulate heat as well as others and/or require more heat due to a lack of mobility.

Brent has been monitoring their customers and proactively approached households and discussed the support on offer. Brent has established services that target support for households that are struggling to pay for their household costs, including heating bills. These households may be from a protected characteristics group.

3. If no groups are affected, explain why.

[Large empty box for answer]

4. Mark with an "X" the potential impact of the policy or proposal on different groups. You can mark more than one box for each group.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age - People of different age groups.		X	

Care Experience - People who have been in care for any period of their childhood.		X	
Disability - People with physical, sensory, learning, and mental health disabilities, long-term conditions, and non-visible disabilities.		X	
Gender reassignment - Transgender and non-binary people, including anyone who is proposing to, started, or who has completed a process to change their gender.		X	
Marriage and Civil Partnership - Applies mainly in the workplace, people who are married or in a civil partnership.		X	
Pregnancy and Maternity - People who are pregnant, on maternity leave, or new parents.		X	
Race and Ethnicity - People of different ethnicity, nationality, and skin colour.		X	
Religion or belief - People of all faiths, and those with no religious belief.		X	
Sex - Differences between men and women, including disparities in pay, career progression, and health outcomes.		X	
Sexual Orientation - People who identify as lesbian, gay, bisexual, queer, asexual, or any other non-heterosexual identity.		X	
Socio-Economic Status - People who are experiencing poverty or socio-economic disadvantage.		X	

5. Complete **each row** of the checklist with an “X”.

SCREENING CHECKLIST

	YES	NO
Does the policy or proposal have implications for eliminating discrimination, advancing equality of opportunity, or fostering good relations among different groups?		X
Does it relate to an area with known inequalities?	X	
Would it add, change, or remove services used by any groups listed in Q4?	X	
Does it have negative or positive equality impacts on any groups listed in Q4?		X
If you have answered YES to ANY of the above, proceed to section B. If you have answered NO to ALL the above, proceed straight to section C.		

SECTION B – IMPACTS ANALYSIS

6. What data and evidence have you used to understand potential impacts? This could include service user data where relevant. If there is little or no evidence, explain why, and note any plans to improve data collection in future, adding this to the Action Plan in Section E.



Build a custom area profile - ONS.pdf

Officers used the data available from [the Open Data, ONS tools to build a custom area profile](#) compared to Brent Council demographic based on Census 2021 and 2024 data about age profile, household deprivation, energy efficiency of housing, ethnicity, gender, household size, disability, socio-economic classification, provision of unpaid care and ability to speak English.

The Office for National Statistics (ONS) measures household deprivation using four key dimensions in the Census: Employment, Education, Health & Disability, and Housing. South Kilburn is an area with a higher proportion than in Brent (42%) of non-deprived households alongside a 6% deprived in three and 1% deprived in four dimensions.

Four dimensions of deprivation:

Employment:

Socio-economic Classification shows that in South Kilburn a higher percentage of residents work in higher paid jobs than on average in Brent. 13% have never worked or have been unemployed for a long time in line with the rest of Brent. 10% of over 16 year old are in full time education, marginally lower than in the rest of Brent.

Education:

49.7% (40%) of residents in South Kilburn have a higher qualification. 78% of residents are not in education. A lower 16% than average (21.7%) in Brent has no education qualification.

Health & Disability:

A higher % (53.7%/52%) is in very good health but at the opposite extreme a higher % (4.9%/3.3%) stated to be in bad health in South Kilburn. A 2% higher proportion of residents (15%) are registered disable in South Kilburn. 86% are not disable.

Housing:

The energy efficiency of housing is better than on average in Brent. 40% of housing is EPC B; EPC C are marginally higher; EPC D are lower than on average in Brent. 97% live in communally heated housing and 95% are flats.

Officers referenced back to the South Kilburn Area Profile 2018 for sense checking.



South Kilburn Area Profile.pdf

7. For each characteristic:

- Provide detail for the impact listed in the response to Q4 in the left-hand box.
- Provide data and evidence to explain how you reached your conclusion in the right-hand box.

Relevant data sources for Brent and its residents can be found in the EIA Guidance document.

Age	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
No direct impact identified, however, older residents and very young children may require higher heating levels due to reduced mobility or higher rate of bodily heat loss. Monitoring will ensure support is available for those households with higher heat consumption.	South Kilburn residents of ages between 70 and older are between 2%-1%. In 2024, newborn babies are a small minority: there were only 121 compared to 4,445 in Brent. The majority of residents are aged between 20-60 years old, with a significant higher proportion aged 25-29 compared to other areas in Brent.

Care Experience	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
Neutral impact; no evidence of disproportionate impact on this group. Monitoring will continue to ensure no indirect impacts occur.	Officers did not find statistically significant data about care experienced residents in South Kilburn.

Disability	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
Neutral overall, though some disabilities, e.g. mobility impairments or conditions leading to home-bound lifestyles may increase heating needs. Regular monitoring and targeted support services are in place for households with higher heat consumption.	A 2% higher proportion of residents (15%) are registered disabled in South Kilburn compared with the borough average.

Gender Reassignment	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.

Neutral impact - no evidence of disproportionate effect, but monitoring will ensure no indirect impacts arise.	
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Marriage and Civil Partnership	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
Neutral impact - proposal applies equally regardless of marital status. No evidence of disproportionate effect.	<p>Legal Partnership Status in ONS tool.</p> <p>56.9% residents have not been married or in a civil partnership – higher than in Brent (43.3%)</p> <p>Only 28.5% are married or in a civil partnership compared to 43.3% in Brent. There is a small but higher % than in Brent of both divorced and separated but still legally married or in a civil partnership.</p>

Pregnancy and Maternity	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
Neutral -there is no impact on this group but considerations about complications in pregnancy and maternity which may impact mobility, and social interaction will be considered. Monitoring will identify any households requiring assistance.	There is no data about pregnancy.

Race and Ethnicity	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
Neutral impact - no evidence of disproportionate effect, but monitoring will ensure no indirect impacts arise.	South Kilburn has a higher 25.4% (17.5%) of residents from a Black, Black British, Black Welsh, Caribbean or African and 42.8% (34.6%) White ethnic background. South Kilburn has only a minority of 12.4% residents from an Asian ethnic background compared to 32.8% in Brent.

Religion or Belief	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
Neutral impact - no evidence of disproportionate effect, but monitoring will ensure no indirect impacts arise.	<p>ONS Tool</p> <p>Residents that reported their religion were majority Christian or Muslim with minorities of other religions including Jewish, Hindu, Buddhist and others.</p>

Sex	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
Neutral impact - no evidence of disproportionate effect, but monitoring will ensure no indirect impacts arise.	There is an equal split of women and men in South Kilburn.

Sexual Orientation	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
Neutral impact - no evidence of disproportionate effect, but monitoring will ensure no indirect impacts arise.	<p>Officers reviewed the topical Brent Data report 2021</p> <p>In this report the middle layer super output area (MSOA) of Kilburn Park is mostly the same as the area of the South Kilburn Estate Regeneration. 256 residents reported belonging to the LGB+ population in the middle layer super output area (MSOA) of Kilburn Park, 3.6% of that area population.</p>

Socio-Economic Status	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
<p>The initiative does not have direct impacts on socio-economically disadvantaged residents.</p> <p>Regular monitoring of heating metered consumptions and billing accounts will identify households within this group that require support to pay for their heating bills.</p>	<p>Socio-economic Classification shows that the divide between residents socio-economic status in South Kilburn is polarised more than in Brent.</p> <p>Socio-economic Classification shows that in South Kilburn a higher percentage of residents work in higher paid jobs than on average in Brent. 13% have never worked or have been unemployed for a long</p>

	time in line with the rest of Brent. 10% of over 16 year old are in full time education, marginally lower than in the rest of Brent.
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Other Relevant Groups	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.

8. Summarise any engagement activities with relevant groups (this may replicate some of the information listed in Q7). State whether those involved represent the people affected by your proposal, or whether more engagement is needed, which should be added to the Action Plan in Section E.

Engagement activities have been held with residents relating to both the Heat Billing and Metering Policy from 2020 as well as events since to keep residents updated on progress of the SK DHN. The latter will continue once the SK DHN contractor is appointed and progress is made on the delivery of the SK DHN.

9. Provide more detail on any areas identified as requiring further data or detailed analysis.

SECTION C – CONCLUSIONS

10. Summarise your overall conclusions based on the analysis:

- If there are no impacts, state that here, and **do not complete sections E or G**.
- If you decide not to move forward, explain why, and **do not complete sections E or G**.
- If there are negative impacts, explain what you'll do to reduce them. If you choose to continue despite negative impacts, or if negative impacts remain following your action plan, provide a justification for your decision.
- If there are positive impacts, explain how these could be strengthened, where possible.

The initiative is expected to maintain overall annual energy costs at current levels at the very least for nearly all homes (99%) in South Kilburn. However, some groups (e.g., older people, people with disabilities, pregnant people) may have higher heating needs. While this does not constitute a direct negative impact, it represents a potential affordability risk for high-consumption households. To mitigate this, residents will have the ability to monitor and control their own usage, and targeted support will be available where excess usage leads to affordability issues.

SECTION D - RESULT

<i>Select one of the following options 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 AND MONITORING

Unless your proposal has no equality impacts or you are not moving forward, complete the table below to track specific actions to:

- Reduce negative impacts and increase positive outcomes.
- Monitor actual or ongoing impacts.
- Record plans to improve data collection.
- Plan any further engagement or analysis that may be required.

Use the 'Status' column on the right to indicate whether the action is yet to start, is in progress, or has been completed.

Issue Identified	Action	Lead Officer	Completion Date	Status
Protected groups unable to pay heat bills	Regular monitoring of heat consumption via metering and billing to identify residents who require support	Daniel Gallagher	Annually	In Progress
SK DHN Engagement	Ongoing engagement with residents to update on SK DHN progress	Daniel Gallagher	Quarterly	In Progress

11. Describe how you will monitor the actual, ongoing impact of the policy or proposal?

As each resident will have their own meter in their property, officers will be able to identify usage and liaise with the resident to discuss support available for heat bills.

Regular engagement with the residents will be held alongside the SK DHN contractor to update on progress as well as heat billing and metering to ensure understanding of the new initiative and ways to get in contact with the Council should support be required.

SECTION F – SIGN OFF

	Signature	Date
Officer:	Francesca Campagnoli	19/12/2025
Reviewing Officer or Head of Service	Neil Martin	22/12/2025

SECTION G – REVIEW

EIAs are live documents and should be reviewed regularly, especially if there are actions still to be completed or if the proposal has significant equality impacts.

When to review

- Review every 6 months until all actions in the Action Plan above are complete.
- If new data, feedback, or changes to the service arise, revisit the EIA to make sure it's still accurate.

Who should review

- The same officer who completed the EIA should carry out the review. If there's been a staffing change, the new lead officer should take over.

What to update

- Use the Status column in the Action Plan above to show progress (e.g. Not Started, In Progress, Completed). Add comments and updates in the table below — include any new data, evidence, or feedback.

When reviews can stop

- Once all actions are complete and no further equality impacts are expected, you can stop reviewing the EIA.
- Add rows to the table below as necessary until all actions are completed.

<u>Date of 1st Review:</u>	
Officer:	
Comment on progress toward specific actions, and provide any data and evidence updates:	
Reviewing Officer or Head of Service:	
<u>Date of 2nd Review:</u>	
Officer:	
Comment on progress toward specific actions, and provide any data and evidence updates:	
Reviewing Officer or Head of Service:	
<u>Date of 3rd Review:</u>	
Officer:	
Comment on progress toward specific actions, and provide any data and evidence updates:	
Reviewing Officer or Head of Service:	