

EQUALITY IMPACT ASSESSMENT (EIA)

POLICY/PROPOSAL:	New Memorandum of Understanding with dockless cycle hire operator Lime
DEPARTMENT:	Neighbourhoods & Regeneration
TEAM:	Transportation Planning
LEAD OFFICER:	Tim Martin – Transportation Planning Manager
DATE:	08/06/2026

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.

It is proposed that ahead of the introduction of a planned London-wide Micromobility Contract, the Council enters a new 12-month Memorandum of Understanding (MoU) with the micromobility operator Lime for the continuation of rental e-bike operations in Brent, which will introduce new controls on how the scheme is managed and operated in the borough and bring greater benefits to Brent residents.

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

The new MoU includes measures and interventions aimed at improving the quality and visibility of our cycle infrastructure that will benefit all groups, but particularly the young, elderly, those with disabilities and women. With high levels of deprivation and problems with obesity prevalent across the borough, providing our residents with targeted cycle training and concessionary fare schemes to promote cycling will benefit all groups, but will particularly benefit certain ethnic minority groups.

Further details of some of the more specific impacts on different groups are set out in Section B.

3. If no groups are affected, explain why.

N/A

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		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		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		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		

Other relevant groups* <i>[replace this text and specify where appropriate]</i>			
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* Other relevant groups could include Carers, Refugees or Asylum Seekers, Veterans, among others. Review the EIA Guidance for more information.

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.

As outlined in the Brent Long Term Transport Strategy and Brent Active Travel Implementation Plan, the borough 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 shape our policies and priorities around cycling and informed the development of the MoU.

Air Quality

The Brent Air Quality Action Plan identifies road transport as being 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 collectively are responsible for over 8% of all deaths in the borough. Among those who are most susceptible to air pollution include people with existing health conditions, such as asthma and heart disease, children, the elderly, pregnant women and communities in areas of higher pollution, such as close to busy roads.

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).

Reducing motor vehicle dominance and facilitating the uptake of 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

The Joint Health and Wellbeing Strategy 2022-2027 outlines that poor health and high levels of inactivity are two of the major challenges facing many Brent's residents. The borough is ranked as the fourth most deprived local authority in London, and 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 cycling, especially for shorter journeys, represents one of the best ways of addressing challenges around poor health and inactivity. However, the fragmented nature of cycling infrastructure in Brent often prevents better utilisation of these assets. A key opportunity that could benefit the borough's residents is the potential for securing the extension of more Cycle Hire

Schemes to the borough; however, such schemes can be expensive and possibly unaffordable to those on very low incomes.

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.

The Brent Climate and Ecological Emergency Strategy outlines how 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. Reducing motor vehicle dominance and reallocating road space to cycling are considered essential measures if we are to achieve our overarching targets. However, these may 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

There is significant potential to reduce trips by car and increase trips by active modes. For example, Transport for London's Cycling Action Plan highlights that half of all car journeys in Brent are less than 5km and could be easily cycled. However, there is a need to overcome range of barriers including low levels of cycle ownership 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

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 cycling. Such issues are often magnified when experienced by those with disabilities. Poorly parked/abandoned dockless bikes obstructing footways are a common source of complaint, impacting visually impaired or those with more limited mobility, (e.g, disabled, older people, parents with children/ pushchairs). The proposals in the MoU aim to improve the accessibility and inclusiveness of our streets for those walking and cycling, including through limiting the number of dockless bikes on our streets and requiring bikes to be parked in dedicated parking bays. This will benefit people of all ages and disabled groups in particular.

7. For each characteristic:

- a. Provide detail for the impact listed in the response to Q4 in the left-hand box.
- b. 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.
A key element of the proposals is to reduce the use of private cars and re-purpose the kerbside to	As outlined in the Joint Health and Wellbeing Strategy 2022-2027, with around 55% of the adult

provide for other uses, such as cycle parking. As older people are more likely to be car owners there may be a slight negative impact on this group. However, this is expected to be outweighed by broad health and accessibility benefits to all age groups, including improved access to better quality pedestrian and cycle infrastructure and enhancements to the wider public realm – in particular a reduction in street clutter due to the provision of dedicated bike parking bays. Increased levels of cycling and a corresponding reduction in use of private cars would also help improve poor air quality in the borough which disproportionately affects the very young and older people. In addition, funding contributions secured from Lime towards cycle training would help reduce the number of people killed or seriously injured on Brent's roads – which would benefit all age groups.	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. With pollution from road transport being responsible for over 8% of all deaths in the borough. Improvements (The Brent Air Quality Action Plan), improvements to air quality resulting from reduced private car use and increased cycling will be of particular benefit to children and the elderly – particularly those with existing health conditions, or living in areas of higher pollution, such as close to busy roads. Investment in cycle training as a means of improving road safety would particularly benefit younger people, who are disproportionately involved in collisions. According to Transport for London (TfL) data, cyclists aged 16 to 30 face the highest casualty risk (Vision Zero action plan 2).
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Care Experience	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
There is no evidence to suggest that people from this protected characteristic will be disproportionately affected (either positively or negatively) by the proposals.	N/A

Disability	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
Improving physical accessibility and removing barriers to people with disabilities is a key aspect of the proposals. The provision of dedicated parking for dockless bikes will bring about public realm improvements and provide safe, welcoming and legible street environments for people with disabilities. However, there are also some adverse impacts, with any poorly parked, abandoned bikes more likely to provide obstructions to blind/ sight impaired, or those with movement impairments.	As outlined in TfL's Accessibility Strategy - Equity in Motion, 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. Mitigation measures set out in the MoU, such as the provision of mandatory, geo-fenced parking bays for dockless bikes, and 2 hour time frames for the

As part of the MoU, targeted services and campaigns to increase participation in active travel by people with disabilities, including inclusive cycling initiatives, are proposed. The renewed focus on engagement is also expected to lead to a better representation of people with disabilities in the decision-making process.	removal of badly parked/abandoned bikes, will help address some of these issues.
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Gender Reassignment	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
There is no evidence to suggest that people from this protected characteristic will be disproportionately affected (either positively or negatively) by the proposals.	N/A

Marriage and Civil Partnership	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
There is no evidence to suggest that people from this protected characteristic will be disproportionately affected (either positively or negatively) by the proposals.	N/A

Pregnancy and Maternity	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
Improving physical access to the public realm – particularly through the provision of dedicated parking provision for dockless bikes and requirement for badly parked/abandoned bikes to be removed within 2 hours - is expected to have a positive impact for this group as it will improve accessibility for pregnant people or those with pushchairs/prams and create safer, more welcoming places. However, there are likely to be some residual impacts even with these mitigations.	The implementation of more ‘people friendly’ street environments – particularly for those with pushchairs/prams - is commonly requested as part of policy/scheme consultation exercises. Feedback received from the various consultation and engagement exercises undertaken as part of the development of the Brent Active Travel Implementation Plan revealed that 46% of those questioned consider Brent to be unfriendly for walking and cycling. Among the main barriers to active travel that respondents highlighted included poor-quality pedestrian infrastructure – in particular poorly managed/maintained pavements; and a lack

	of/poor quality cycling infrastructure – with the lack of dedicated cycle parking being of particular concern.
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Race and Ethnicity	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
Improving road safety and promoting active travel feature heavily as part of the Social Value requirements of the MoU and measures such as cycle training and will provide significant benefits to all groups. However, it is recognised that 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 is required.	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, Council plans such as the Borough Plan, Inclusive Growth Strategy, and Brent Black Community Action Plan all highlight that 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.

Religion or Belief	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
There is no evidence to suggest that people from this protected characteristic will be disproportionately affected (either positively or negatively) by the proposals.	N/A

Sex	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
Women and girls are often less likely to 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, safe/secure cycling infrastructure as part of the MoU, along with road safety education/cycle training will benefit all groups, but particularly women.	Data from TfL's latest Travel in London Report reveals that barriers to active travel are particularly acute for groups who are currently under-represented, such as women and ethnic minority groups. For cycling in particular, there is under-representation in several groups, including amongst women and over- representation in others, including men.

Sexual Orientation

Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
There is no evidence to suggest that people from this protected characteristic will be disproportionately affected (either positively or negatively) by the proposals.	N/A

Socio-Economic Status	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
There is a strong link between the Index of Multiple Deprivation (IMD) and cycling levels. Residents in the more deprived areas generally exhibit lower rates of recreational cycling and active commuting. However, those who cycle in these areas face disproportionately higher risks of traffic injuries and fatalities. As part of the MoU, targeted training and services, fare concessions and campaigns to increase levels of cycling in these areas are planned as a means of addressing these issues. The planned creation of 'Equity Zones' and offer of concessionary fares in particular will mitigate affordability barriers for many Brent residents.	Data from TfL's latest Travel in London report and its 2023 Inequalities in Road Danger in London report reveals that cycling participation in London heavily skews toward higher-income households and professional occupations. It also outlines that the more deprived the area, the higher the risk that someone travelling in that area will be seriously injured or killed in a road traffic collision in that area, with the 30% most deprived postcodes having more than double the number of casualties per kilometer compared with the least deprived 30%.

Other Relevant Groups	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
N/A	N/A

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.

Our approach to cycling and the development of the new MoU have been informed by ongoing engagement with Brent's diverse communities – principally through a new Residents Forum which was started in 2025 - as well as wider feedback received as part of several Council consultations – including on the Brent Long Term Transport Strategy and the Brent Active Travel Implementation Plan. This has helped ensure that the proposals reflect the genuine needs and desires of those who live and work in the borough and will contribute to bringing about real and lasting change. Among the key issues raised, particular amongst elderly and disabled residents, is a need to address concerns around inconsiderate and unsafe cycle parking. Public consultation and wider stakeholder engagement is also undertaken on all schemes set in the public highway. A series of consultation exercises were carried out during 2025 on proposals for the siting of
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dedicated parking bays for dockless bikes and similar exercises will be carried out during 2026 as new bays are delivered. Equalities monitoring undertaken as part of the 2025 consultation elicited a very small number of responses. As such, it is difficult to draw any meaningful conclusions as to how representative of Brent's population the consultation or the response levels of different protected characteristic groups.

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

Among the main data gaps include limited information on protected characteristics of users and those affected by the dockless bike operations, and limited disaggregated impact data. These will be addressed through the monitoring and action plan.

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.

A key aim of the Council is to make active travel the natural first choice for everyday journeys and to increase walking and cycling across Brent. This aligns with a wide range of National, Mayoral and borough plans and strategies including the Cycling and Walking Plan for England, the Mayor of London's Transport Strategy (MTS); the Borough Plan; the Brent Climate and Ecological Emergency Strategy; the Joint Health and Wellbeing Strategy; and the Brent Local Plan. Accordingly, many of the interventions and actions proposed as part of the new MoU are designed to meet multiple priorities and objectives, some of which will have varying degrees of impact – both positive and negative - on our diverse communities.

Following assessment, it is considered that, on balance, the significant benefits that the interventions and actions within the new MoU will bring, including those to protected characteristics, will significantly outweigh the disbenefits to these groups. However, where negative impacts have been identified, it is anticipated that these can be addressed or mitigated. A requirement to engage closely with local communities, our partners and a wide range of stakeholders will ensure this.

On this basis, it is recommended that the approach contained within the new MoU with Lime for improving their operations in the borough and enabling more people to cycle is adopted but is kept under regular review.

SECTION D - RESULT

Select one of the following options 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 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
Limited understanding of impact of micromobility operations on different equality groups	Design future consultation and engagement events/exercises to capture key issues/concerns of and to ensure improvements for different equalities groups.	Transportation Planning Manager (Tim Martin)	December 2026	Not started
Badly parked/abandoned bikes causing obstruction and affecting accessibility of disabled people, older residents, and parents	Expand the network of dedicated parking bays – ensuring that new bays are designed with inclusive principles, and increase monitoring and enforcement – ensuring bikes are collected within 2-hour required timeframes.	Electric & Shared Mobility Programme Coordinator (TBC – post currently vacant)	Ongoing	In progress
Data gaps around ridership, management of operations and wider scheme impacts	Develop live data dashboard presenting monitoring data in real time capturing information on use by and impacts on different equalities groups where possible.	Senior Public Affairs Manager, Lime (Alice Pleasant)	December 2026	Not started
Lower rates of cycling in more deprived areas of the borough	Develop and implement 'Equity Zones' – to include targeted training and promotional campaigns, and fare concessions, as a means of removing access and affordability barriers for residents and to increase levels of cycling in these areas.	Electric & Shared Mobility Programme Coordinator (TBC – post currently vacant)	December 2026	Not started

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

A key requirement of the new MoU is for operators to provide the Council with clear, regular monitoring data covering a range of metrics. This will help us to measure the effectiveness of the proposals and ensure any negative impacts are removed or mitigated.

SECTION F – SIGN OFF

	Signature	Date
Officer: Tim Martin – Transportation Planning Manager		10/6/2026
Reviewing Officer or Head of Service		14/7/2026

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:	