# Brent Design Guide - Supplementary Planning Document (SPD1) Equality Analysis

#### November 2018

#### **Screening Data**

1. What are the objectives and expected outcomes of your proposal? Why is it needed? Make sure you highlight any proposed changes.

The Brent Design Guide Supplementary Planning Document (SPD1) will when adopted replace an existing Brent Design Guide for New Development Supplementary Planning Guidance (SPG17) which was adopted in October 2001. This document sets urban design principles and advice that will ensure that the quality of built development that comes forward in the Borough is improved. It is supplementary to planning policies in the 2010 Brent Core Strategy, plus other policies within the Brent Local Plan such as the Development Management Policies and the London Plan.

The overarching objectives of the SPD1 are:

- a) To support growth which creates a good environment for new and existing residents and businesses; and
- b) The expectation that developers will demonstrate how their proposals make a positive design contribution to the Borough as a whole and relate well to the surrounding area.
  - 2. Who is affected by the proposal? Consider residents, staff and external stakeholders.

The proposal will impact on local residents and local businesses, plus other organisations in the area such as social infrastructure providers (e.g. schools, doctors' surgeries, community groups and religious organisations) and Council services. The SPD will be applicable across the whole Borough, except the area within the Old Oak and Park Royal Development Corporation (OPDC) boundary. As such the population characteristics are:

Roughly 50/50 male/female population split.

The population has a white British representation at 16.4%, Asian/Asian British (Indian Subcontinent) at 23.8% and a Black/African/Caribbean/African British population split at 18.8%.

In terms of disability 14.5% of the population have their day to day activities limited by health issues.

In terms of religion 41.5% are Christian, 18.6% are Muslim and 17.8% are Hindu in Brent.

In terms of the age of the population, Brent has 24.9% of the population as younger people (under 20) whilst over 60s represent 14.5% of the population.

It is estimated that the Lesbian, Gay and Bi-sexual (LGB) population in Brent between 15,561-21,785; 3112 people experience gender variance and 62 are transgender people.

### 3.1 Could the proposal impact on people in different ways because of their equality characteristics?

There are a number of ways that the SPD1 could impact on people in different ways because of their equality characteristics. The SPD1 seeks to build on Local Plan policies that provide accessible development. This relates not only to its physical accessibility, e.g. promoting measures to assist those with a disability, or perhaps with children in buggies, e.g. level access, improving the visibility of features such as main entrances, but also through encouraging mixed use developments that include affordable housing and a range of other uses to create a sustainable neighbourhood. This should ensure greater social integration and reduce the need to travel. This should therefore impact positively on those groups that historically are poorer economically (such as black and minority ethnic groups) who might not be able to afford car travel or public transport, or might otherwise live in areas that do not have a high level of social infrastructure due to weaker economic demand, e.g. certain shops.

3.2 Could the proposal have a disproportionate impact on some equality groups? If you answered 'Yes' please indicate which equality characteristic(s) are impacted It is not considered that the proposed developments will have a disproportionate adverse impact on groups with protected equality characteristics. More detail is set out below in Section 5.

### 3.3 Would the proposal change or remove services used by vulnerable groups of people?

No, neither directly or indirectly as a result of the SPD1.

#### 3.4 Does the proposal relate to an area with known inequalities?

The guidance relates to the Borough as a whole (except the area within the Old Oak and Park Royal Development Corporation boundary) which has some areas of high levels of deprivation as measured by the Indices of Multiple Deprivation.

### 3.5 Is the proposal likely to be sensitive or important for some people because of their equality characteristics?

As set out above, the guidance will be sensitive or important for some people because of their equality characteristics.

#### 3.6 Does the proposal relate to one of Brent's equality objectives?

The SPD1 relates to a multiplicity of strategic priorities and equality and human rights objectives as set out in the Equalities Action Plan 2015. These include:

Supporting local enterprise, generating jobs for local people, helping people into work and promoting fair pay. This will be delivered through an emphasis on providing mixed use developments that contain a variety of economic activities, rather than solely focussing on residential uses.

Making sure that our children and young people have access to the best education and training, achieve to their potential and have the best start in life. This will be delivered through an emphasis on providing mixed use developments that contain a variety of uses, including provision of well-designed educational facilities rather than solely focussing on residential uses.

Enabling people to live healthier lives and reducing health inequalities. The guidance seeks to promote urban design that improves the general environment and therefore provides better health outcomes for residents, workers and those visiting the Borough. This will include giving greater priority to the pedestrian environment, greening and improving air and water quality.

Making sure that Brent is an attractive place to live, with a pleasant, sustainable environment, clean streets and well-cared for parks and green spaces. This one of the most significant elements of the SPD1, providing for a high quality, desirable place which people want to live in, work in and visit.

Continuing to reduce crime, especially violent crime, and making people feel safer. The SPD1 will reduce the opportunities for crime by providing places built along good urban design principles. These include defining private and public space, building properties and places that provide the opportunity for increased passive surveillance of the public realm. It also involves providing facilities that reduce for instance instances of petty vandalism by providing play and youth facilities.

*Increasing the supply of affordable, good quality housing.* The guide seeks to provide an efficient use of land, thus creating better opportunities for providing additional amounts of housing and therefore associated affordable housing.

Building community resilience and promoting citizenship. This is being achieved through making the Borough a much more desirable place in which people want to live and stay, thus creating stable, rather than transient communities with little interest in their surroundings.

Making sure that everyone in the borough is able to participate in local democracy, has a fair say in the way that services are delivered, and is listened to and taken seriously. The SPD1 will be subject to consultation and an opportunity for comment before it is adopted by Cabinet.

**Recommend this EA for Full Analysis?** No

#### **Analysis**

### 5. What effects could your policy have on different equality groups and on cohesion and good relations?

#### 5.1 Age (select all that apply)

Positive

The SPD seeks to provide inclusive communities. For the younger, this will be through encouraging appropriate amenity facilities on site, e.g. play space within residential developments. For all groups the need to provide accessible communities will result in easier movement which will be beneficial to those with a disability (generally older people) or those will other accessibility issues (e.g. parents with small children). The incorporation of Lifetime Homes standard (as covered now by Building Regulations) will provide for more convenient level access and wider doorways which will be better for families with children in buggies and also for older people who might not be disabled but have issues related to accessibility currently.

#### 5.2 Disability (select all that apply)

Positive

New homes will reduce issues related to respiratory diseases as dwellings will be better insulated, better ventilated and cheaper to heat and light. At least 10% which are wheelchair accessible/easily adapted for wheelchair use.

#### 5.3 Gender Identity (select all that apply)

Neutral

There are not considered to be any specific gender identity issues related to the SPD.

#### 5.4 Marriage and civil partnership (select all that apply)

Neutral

There are not considered to be any specific gender identity issues related to the SPD

#### 5.5 Pregnancy and maternity (select all that apply)

Positive

The new homes built will be to Lifetime Homes standard (as covered now by Building Regulations). These provide for more convenient level access and wider doorways which will be better for families with children in buggies and also for older people who might not be disabled but have issues related to accessibility currently.

#### 5.6 Race (select all that apply)

Positive

As identified the area has a high representation of BME groups. The regeneration of the area should be positive for these groups due to the improvements which will be made to improve many aspects related to the quality of life.

#### 5.7 Religion or belief (select all that apply)

Neutral

The provision of facilities for these groups is part of a sustainable community design, but the SPD does not identify in its own right specific facilities required.

#### 5.8 Sex (select all that apply)

Neutral

No significant differences has been identified in relation to sex aspects, other than those related to specific other characteristics, e.g. pregnancy and maternity.

#### 5.9 Sexual orientation (select all that apply)

Neutral

No significant impacts either negative or positive has been identified in relation to this characteristic.

- 6. Could any of the impacts you have identified be unlawful under the Equality Act 2010? Prohibited acts include direct and indirect discrimination, harassment, victimisation and failure to make a reasonable adjustment.
- 7. Please provide a brief summary of any research or engagement initiatives that have been carried out to formulate your proposal.

The SPD1 has taken and identified best practice in relation urban design guidance at a national and regional level.

#### What did you find out from consultation or data analysis?

Public consultation has provided a range of views on numerous elements of the previous SPD1. These have been taken into account where appropriate. They focused on design and did not relate to equality issues.

# Were the participants in any engagement initiatives representative of the people who will be affected by your proposal?

Yes, the consultation was open to the entire population of the Borough, which as identified is very diverse.

#### How did your findings and the wider evidence base inform the proposal?

Officers have a high appreciation of the impacts that guidance and planning policies can have on impacting on equalities and have sought for the guidance to be as positive as it can about promoting inclusive design.

### 8. What actions will you take to enhance the potential positive impacts that you have identified?

This will be followed through by planning officers in their consideration of planning applications and an attempt to ensure that equalities aspects are positively addressed through proposed developments.

## 9. What actions will you take to remove or reduce the potential negative impacts that you have identified?

Not applicable

**10. Please explain how any remaining negative impacts can be justified?** Not applicable