

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	Church End Growth Area (CEGA) Masterplan and Supplementary Planning Document (SPD)
DEPARTMENT:	Regeneration & Environment
TEAM:	Regeneration
LEAD OFFICER:	Bruna Varante, Principal Regeneration Officer
DATE:	27/03/2023

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.

Brent adopted Local Plan (2019-2041) identifies Church End as a Growth Area. It requires a Masterplan to facilitate and unlock its regeneration due to its many complex challenges. The Church End Growth Area (CEGA) Masterplan is proposed to:

- Establish the long-term vision and objectives for CEGA;
- Bring forward physical, social and economic regeneration for the benefit of local residents, businesses and communities;
- Identify and secure community and cultural facilities, green open spaces, employment and commercial uses, transport and other infrastructure to support good growth;
- Provide a clear framework for coherent and comprehensive redevelopment of an area where land ownership is highly fragmented;
- Ensure that the negative consequences of piecemeal development are avoided; and
- Provide a basis for planning decisions and serve as a material consideration throughout the planning process.

Intensification of industrial sites and co-location with residential uses is proposed to deliver:

- Fit for the future industrial space for local businesses and emerging sectors including film, music, media and food production;
- Opportunities for employment, skills and training for local people;
- A minimum of 1,300 new high quality homes, including affordable homes, family-sized dwellings, and specialist accommodation for older people;
- A revitalised town centre and outdoor market with a diverse offer;
- A range of new community and creative spaces that support interaction and community cohesion;
- New open spaces, incorporating play for a range of ages including young people and teenagers, alongside opportunities for food growing and access to nature;
- A high quality environment that is safe and accessible to everyone;
- Streets that encourage walking and cycling over private vehicle use, and better connect Church End to the surrounding area;
- A place that achieves the highest standards of sustainability and supports a low carbon circular economy.

The Masterplan will be a Supplementary Planning Document (SPD) to Local Plan policy BSGA1. To ensure the SPD remains relevant over the Local Plan period, the Council will be expected to review the document every 5 years.

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

The CEGA Masterplan SPD will affect various groups of people who live and work in Church End, including existing and future residents, community groups, businesses, landowners, developers, ward members and providers of social infrastructure. Further details are set out below:

About Church End Residents

According to the 2011 census, the Church End community is composed of 66% BAME groups, mainly Somali and African Caribbean communities. Latest 2022 census data shows the local ward population has increased 5% over the past 10 years and is now composed of 69% BAME groups. The area also has an average income lower than Brent and London averages, with Universal Credit Claims higher than in Brent and in London (Department for Work & Pensions).

The CEGA Masterplan SPD is proposed to facilitate and promote the delivery of new housing including new affordable housing, workspaces, green spaces, as well as community facilities, and to ensure disadvantage groups can access more homes, employment & training and high quality and inclusive public spaces.

Young People

The CEGA Masterplan SPD highlights the importance of supporting local young people's growth and development as well as identifying the potential to capitalise on the creative talent by securing dedicated spaces for creative development.

Elderly People

The CEGA Masterplan SPD identifies the local need for specialist housing dedicated to older people and sets out a number of improvements to ensure accessibility and mobility are enhanced and maximised within the area.

Businesses

Whilst redevelopment takes place, some businesses might need to be relocated to alternative premises. A *Decant and Business Relocation Strategy* identifies the more and less actively used employment sites within the area, and sets out phasing and measures to help to ensure that businesses are protected and supported while redevelopment takes place.

Service providers of social infrastructure and their service users

CEGA Masterplan SPD identifies locations for social infrastructure, including a Secondary School, a potential location for a Health Facility (subject to agreement with the Clinical Commissioning Group (CCG)); and a number of community spaces, pocket parks and areas of play, as well as improvements to the existing provision.

Users, developers and registered providers of social/intermediate/affordable housing

The CEGA Masterplan SPD provides planning and development guidance to facilitate the delivery of at least 1300 new homes across Church End, highlighting the percentage of affordable homes that should be provided within the different site allocations, and which will later be managed by housing associations and others.

London Borough of Brent departments

Including staff from Planning, Housing, Property, Highways, Public Health, Customer & Digital Services (including Revenue and Debt), Environment Services, Regeneration, Growth & Employment.

External and Statutory Agencies

Environment Agency, Greater London Authority, Natural England, Historic England, Thames Water, Transport for London.

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.

Yes, there is relevance to the council’s public sector equality duty, and due regard to such is paid in drawing up this equality analysis.

The proposed CEGA Masterplan SPD will guide substantial regeneration and growth planned to be delivered in the borough over the next 20 years, and therefore should aim to remove or minimise disadvantages which are connected to characteristics of protected groups. Consistent with the three aims of the general equality duty, the CEGA Masterplan SPD aims to eliminate unlawful discrimination, advance equality of opportunity, and foster good relations between different groups.

Affordable Housing

The CEGA Masterplan SPD plans to meet some of the affordable housing needs of the borough, including the needs of protected groups, through for example wheelchair accessible and adaptable housing and supported older persons housing provision. It has a minimum target of 35% affordable housing and when viable 50% affordable housing, with a 70:30 social to intermediate split.

Industrial Space & Affordable Workspaces

The intensification of industrial uses and provision of employment spaces/affordable workspaces is expected to advance equality of opportunity, by giving those with less financial security the opportunity to access employment in the CEGA.

Employment Opportunities

By securing new modern and fit for purpose employment spaces, we seek to attract higher value jobs to the area for local people, as well as training and apprenticeship opportunities.

Public and Green Spaces

Public consultation identified a lack of space where all groups in the community comes together, and the SPD seeks to secure new community space and ensure public spaces are inclusive and designed to promote social interaction between different groups.

Active Travel

The CEGA Masterplan SPD also aims to secure enhanced, safe, accessible and connected public realm and green open spaces for all user groups and further provisions for safe walking/cycling routes that will have positive impacts on all groups.

Partnership Development

To bring about comprehensive redevelopment in the area, partnerships are required between landowners and developers, the Council, and the existing and future communities. These partnerships also have the potential to facilitate collaboration between different communities, and in realising the objectives of the CEGA Masterplan SPD foster good relations and create a sustainable and inclusive neighbourhood.

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	Neutral/None	Negative

Age	X		
Sex	X		
Race	X		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

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’s adopted Local Plan (2019-2041) identifies the CEGA as one of 8 growth areas, viewed as the most sustainable spatial expression for growth, exploiting brownfield land, good access to public transport and higher densities to deliver the majority of the future housing and employment needs of the borough, and was extensively consulted upon and subject to its own equality impact assessment.

The CEGA Masterplan SPD is an opportunity for Brent Council to bring about the physical and socio-economic regeneration of not only CEGA, but also build positive relationships with surrounding neighbourhoods such as Neasden, Harlesden and Willesden Green. The CEGA Masterplan SPD conforms to both the adopted Brent Local Plan (2019-2041) and the new London Plan.

External Stakeholder Engagement – Prior to Statutory Consultation

The CEGA Masterplan SPD has been developed based on robust analysis and extensive stakeholder engagement undertaken during 2021, including:

- Interviews with community groups, local charities, housing associations, faith groups and businesses;
- An online platform reaching out to a greater number of stakeholders, residents, businesses, community groups, etc;
- A short documentary developed by a local youth-led charity;
- Interactive workshops with community groups;
- Interactive workshops with employment and affordable workspace stakeholders;
- Spring outdoor event;
- Activity with a local primary school;
- Targeted discussions with major landowners;
- Autumn exhibition;
- Online survey;
- Meeting with targeted groups.

Overall, almost 1.000 people participated in the process.

Internal Stakeholder Engagement

The development of the Masterplan was also advised by the following Council's teams: Planning; Transport Planning; Partnerships; Property; Capital Programme; Early Years; Employment, Skills and Enterprise; Libraries; Culture; Parks; Highways and Environmental Services.

Statutory Consultation

The CEGA Masterplan SPD was subject to 7 weeks of formal consultation from 22 September 2022 to 10 November 2022. This was in accordance with the Regulations and the Council's Statement of Community Consultation (SCI). Statutory public consultation provided further opportunities for engagement with partners, stakeholders, local residents, businesses and communities.

Information about the CEGA consultation has reached over 16,000 people via the Council's social media. There were 1802 hits to the dedicated CEGA website. 627 people in total, including residents, statutory consultees, and other stakeholders attended the four consultation events. 192 people have engaged in dedicated one-to-one discussions with officers about the plans. 97 people completed the surveys available in our events and online via our consultation portal. 19 people/organisations issued formal consultation responses.

In total, 116 responses have been received on the draft Masterplan SPD during the 7-week consultation period. Responses are broadly positive and supportive of the overarching vision for regeneration set out in the draft CEGA Masterplan SPD.

Baseline information

The following sources have informed the CEGA Masterplan SPD and this equality analysis:

Population & Equality

- Adopted Brent Local Plan (2019-2041) and evidence base, London Borough of Brent
- Demographics analysis London Borough of Brent Research & Intelligence Team
- Census 2011 and Census 2022, Office National Statistics

Housing

- Strategic Housing Market Assessment (SHMA), 2018, ORS
- Adopted Brent Local Plan (2019-2041) and evidence base, London Borough of Brent
- Brent Inclusive Growth Strategy (2019-2040), London Borough of Brent
- CEGA Masterplan Viability Assessment (2021), BNP Paribas

Health & Well-Being

- Direct engagement with NHS and the CCG, including HUDU assessment of future health needs.
- Assessment on existing facilities for sports, green space, infrastructure etc. and needs assessment for future provisions and improvements within CEGA.

Local Economy

- Brent Employment Land Demand Study, 2015, ORS
- Brent Affordable Workspace Strategy, 2020
- Brent Employment, Skill and Enterprise Strategy 2015-2020

Education

- Joint Strategic Needs Assessment (JSNA), 2019/2020, London Borough of Brent
- Brent School Place Planning Strategy (June 2017 refresh), 2019-2024, London Borough of Brent

Land use

- Brent Borough Plan (2022)
- Brent Meanwhile Use Strategy (2021)
- Brent Affordable Workspace Strategy (2020)
- Brent Poverty Commission Report (2020)
- Brent Black Community Action Plan (2020)
- Brent Inclusive Growth Strategy (2019-2040)
- Brent Infrastructure Delivery Plan (2019)
- West London Employment Land Evidence (2019)
- Brent Indoor Sports & Leisure Facilities Needs Assessment (2018)
- Brent Strategic Housing Market Assessment (2018)
- GLA Industrial Intensification and Co-location Study (2018)

Movement and Connectivity

- Brent Long Term Transport Strategy (2015-2035) (2021 Review)
- TfL Mayor's Transport Strategy (2018)
- TfL Vision Zero Action Plan (2018)

Green and Open Spaces

- Brent Health and Wellbeing Strategy (2022-2027)
- Brent Food Growing and Allotment Strategy
- Brent Open Space, Sports and Recreation Study (2019)
- Brent Council Indoor Sports and Leisure Facilities Needs Assessment (2018)
- The London Food Strategy (2018) (GLA) GLA Shaping Neighbourhoods: Play and Informal Recreation SPG (2012)
- GLA Urban Greening Factor LPG (draft) (2021)
- Sport England's Design Guidance
- Natural England Biodiversity Metric, Small Sites Metric (SSM) and Environmental Benefits from Nature Tool (EBNT)
- Fields In Trust Guidance for Outdoor Sport and Play (2020)

Building Design and Architecture

- Brent Design Guide SPD1 (2018)
- Brent Tall Buildings Strategy (2019)
- Characterisation and Growth Strategy LP (2022)
- Optimising Site Capacity: A Design Led Approach LPG and Housing LPG (2022)

Climate Change and Sustainability

- Brent Climate & Ecological Emergency Strategy (2021-2030)
- West London Strategic Flood Risk Assessment
- West London Waste Plan (2015)
- GLA Air Quality Positive LPG (2022) (draft)
- GLA Air Quality Neutral LPG (2022) (draft)
- GLA Be Seen energy monitoring LPG (2021)
- GLA Circular Economy statements LPG (2021) (draft)

- GLA Circular economy statements LPG (2020)
- GLA Using Green Infrastructure to protect people from Air Pollution (2019)
- GLA London Environment Strategy (2018)
- GLA London Sustainable Drainage Action Plan (2016)
- GLA The Control of Dust and Emissions During Construction and Demolition SPG (2014)
- Transport for London SUDS in London: A Guide (2016)
- Urban Design for London Designing Rain Gardens: A Practical Guide (2018)
- Homes England Building for a Healthy Life (2020)
- CIRIA The SUDS Manual (2015)

Statutory Consultation

The CEGA Masterplan SPD will be subject to statutory public consultation for 6 weeks in accordance with Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Council's Statement of Community Involvement. This will provide developers and local businesses, residents and communities with the opportunity to provide input into the Masterplan SPD, with the council considering and responding to all representations received.

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	<ul style="list-style-type: none"> • Affordable Housing/Workspace: Meeting some of the borough's affordable housing and local employment needs is considered likely to have positive impacts on all community groups and ages, especially those with socio-economic disadvantaged background as Church End is known for overcrowding issues. • Employment Opportunities: By securing new modern and fit for purpose employment spaces, we seek to attract higher value jobs to the area for local people, as well as training and apprenticeship opportunities. • Specialist Housing: Older people's accommodation is sought across the CEGA to meet local needs for such identified in the Strategic Housing Market Assessment (SHMA). • Housing Unit Size: Larger family accommodation is sought across the CEGA to meet the need for such identified in the SHMA and address the current known issues of overcrowding in the borough. • Health, mobility and wellbeing: Brent is the 4th most inactive borough in London, and nearly 1 in 5 adults in Brent are obese, with this trend set to increase. Provision for enhanced public realm and 'Healthy Streets', publicly accessed green open spaces and an improved movement and green spaces network will have a positive impact on all groups and ages.
DISABILITY	
Details of impacts identified	<ul style="list-style-type: none"> • Accessible Housing: Provisions for accessible housing which are DDA friendly and provide blue badge parking will be beneficial for Disability groups. 10% of homes are also proposed to be accessible. • Infrastructure: Disabled people might also expect to benefit from investment within the movement infrastructure as a number of crossings, junctions and public/green spaces have been identified for improvement and for development.

	<ul style="list-style-type: none"> • Parking; the plan recognises the need to secure parking in new development for people with disabilities
RACE	
Details of impacts identified	<ul style="list-style-type: none"> • BAME Communities: Given Church End's demographics, with BAME communities (69.6%), mainly Somali and African Caribbean, regeneration and investment into the area is likely to benefit ethnically diverse residents, community groups and businesses. • Business Relocation: In the short term, there is a potential for the CEGA Masterplan SPD to disproportionately affect Somali and African Caribbean residents, as businesses within the industrial sites are relocated during redevelopment. To mitigate that, the Council undertook pre-statutory consultation with the business community and developed a Decant and Business Relocation Strategy to minimise impacts. In the longer term the Masterplan SPD proposes improved spaces for businesses and more opportunities for commerce and enterprise. After businesses and residents' feedback regarding the Church End outdoor market, original plans to relocate to Neasden Lane during the car park (BSSA3) redevelopment have been amended to allow a more localised relocation on Church Road. We will continue to monitor and engage with businesses and residents to migrate potential negative impacts. • Safety: Increased surveillance and high quality public realm is likely to provide increased safety, an issue which particularly impacts BAME communities.
SEX	
Details of impacts identified	<ul style="list-style-type: none"> • Safety: Increased surveillance and high quality public realm is likely to provide increased safety, an issue which particularly impacts women.
SEXUAL ORIENTATION	
Details of impacts identified	<ul style="list-style-type: none"> • No identified impacts upon groups with the protected characteristics of Sexual Orientation is identified in this equality analysis.
PREGANCY AND MATERNITY	
Details of impacts identified	<ul style="list-style-type: none"> • Community Spaces: Increased community spaces will offer more opportunities for accessing services and support. • Public/Green Spaces: Connected network of safe and accessible public, green and play spaces will also provide more opportunities and support for women in pregnancy and/or with children.
RELIGION OR BELIEF	
Details of impacts identified	<ul style="list-style-type: none"> • Religious Institutions: highlight demand for parking, including disabled parking, to access and attend religions premises and events. The Masterplan emphasises the need for new development to provide sufficient inclusive parking to access community facilities and disabled parking. The Masterplan also identified options for potential future lower traffic environments in the Church End areas and any future such proposals and consultations would need to consider potential impacts on religious premises in the areas.

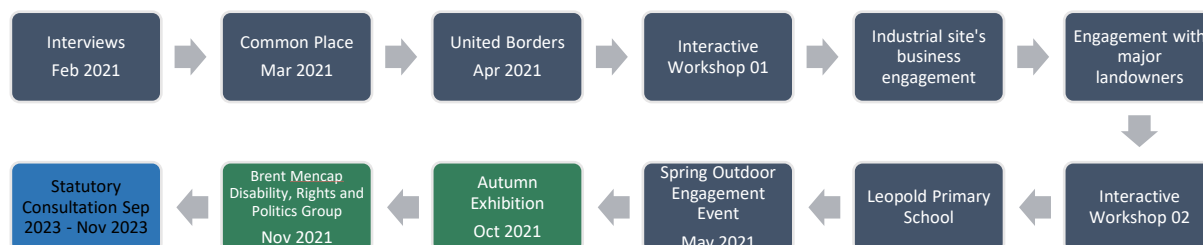
GENDER REASSIGNMENT	
Details of impacts identified	<ul style="list-style-type: none"> No identified impacts upon groups with the protected characteristics of Gender Reassignment is identified in this equality analysis.
MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	<ul style="list-style-type: none"> No identified impacts upon groups with the protected characteristics of Marriage & Civil Partnership is identified in this equality analysis.

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 CEGA Masterplan SPD has been developed over 2021 through ongoing consultation with a wide range of key stakeholders, with representatives of those who will be affected by the proposal, including BAME, young people and people with disabilities. Public participation was, at times, limited by the coronavirus pandemic, however, the Council mitigated these circumstances by making use of a hybrid approach for engagement which included online and physical participation events, over a 10 month period, almost 1,000 participated of the process. The Council is committed to re-engaging the local community throughout the statutory public consultation process by summer 2022. This equality analysis will be updated following further consultation.



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

N/A

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

N/A

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

To ensure the CEGA Masterplan SPD remains relevant over the Local Plan period, the Council will consider review of the document after 5 years. Notwithstanding this potential for review, the guidance must be sufficiently flexible and capable of responding to changes in market demands and commercial and economic circumstances. These are factors that can change in a short space of time.

The CEGA Masterplan SPD also provides information on measures that can be taken for future-proofing design in a changing climate and the vital transitioning to net-zero carbon. New development must embody the principles of sustainability and adapt to future changes, and this is particularly relevant as the CEGA is planned to be delivered over a period of approximately 15-20 years.

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 strategic objectives of the CEGA Masterplan SPD are to deliver new homes, jobs and infrastructure and in so doing support good growth, deliver high quality placemaking, and ensure social, economic and physical regeneration brings forward transformational changes, contributing to a vibrant and inclusive neighbourhood.

The CEGA Masterplan SPD will facilitate these objectives and help realise their ambitions for the benefit of the borough's residents, businesses and diverse communities.

The CEGA Masterplan SPD will have positive impacts on existing and new communities alike, including different groups, as it identifies a range of placemaking, environment and sustainability principles which should apply to and guide comprehensive redevelopment of the area, as well as specific positive impacts for people of different age groups and people with disabilities.

Some businesses might need to be relocated to alternative premises whilst redevelopment takes place. The Masterplan proposed a phased redevelopment approach aligned with a *Decant and Business Relocation Strategy* to support and protect businesses, including more intensively used sites for on-going industrial use.

Reducing traffic congestion and CO2 emissions is a priority for CEGA and new developments are proposed car-free or car-lite, supported by share mobility provision such as car clubs. The CEGA Masterplan however recognises the need for new development to provide inclusive car parking for people with disabilities and to access community facilities.

SECTION D – RESULT

<i>Please select one of the following options. Mark 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	
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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
Statutory public consultation for a minimum of 6 weeks	Review of all comments received through consultation process	BV	Sep-Nov 2022
Modification made following consultation and Equality Analysis updated	Integrate relevant comments and feedback	BV/JK	March 2023
Adoption of the CEGA Masterplan SPD	The Affordable Workspace SPD will now apply; any development proposals must take into account and adhere to the principles set out and guidance provided.	BV	May 2023
Review periodically (every 5 years)	Monitor and review equalities impacts	BV	n/a

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Bruna Varante, Principal Regeneration Officer
REVIEWING OFFICER:	Jessica Harrison, Senior Policy and Equalities Officer
HEAD OF SERVICE:	Jonathan Kay, Head of Regeneration – 27/03/2023