

## EQUALITY ANALYSIS (EA)

<b>POLICY/PROPOSAL:</b>	London Borough of Brent Local Plan (2020 – 2041)
<b>DEPARTMENT:</b>	Regeneration & Environment – Planning, Transport & Licensing
<b>TEAM:</b>	Planning Policy
<b>LEAD OFFICER:</b>	Charlotte Ashton
<b>DATE:</b>	8 <sup>th</sup> October 2019 (Updated February 2020)

*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.

#### **Proposal:**

This EA is for the new Brent Local Plan (2020 – 2041). The new Local Plan will set out the London Borough of Brent’s policies towards housing, town centres, open space, employment, community facilities, the built and natural environment, and transport and specific development sites in order to meet the borough’s and London’s needs. The plan aims to achieve good growth in Brent by giving guidance on what can be built, where it can be built, how, and for what use, and whether any restrictions apply.

The new Local Plan, once adopted, will replace the currently adopted Brent Local Plan. This comprises a suite of documents adopted between 2010 and 2015. Policies that are not included within the new Local Plan have been superseded because either they are:

- Covered in the London Plan;
- No longer considered to be of such importance that they warrant inclusion; or
- Have been incorporated into new policies with significant wording changes.

The new Brent Local Plan is required because national planning policy and practice guidance has radically altered since the principal elements of the current Local Plan were adopted. Additionally, there have been significant changes to the London Plan which resulted in the borough’s housing targets increasing. The latest Draft London Plan again proposes to increase Brent’s housing targets substantially, and the borough cannot continue to accommodate the increase in dwelling numbers without a radical review of its Local Plan. The borough will also be required to accommodate equivalent jobs and improvements to social and physical infrastructure to meet need.

#### **Objectives / Expected Outcomes:**

The Local Plan aims to achieve good growth by addressing each of the following:

- Strong and Inclusive Communities
- Making the best use of land
- Creating a Healthy Borough
- Growing a Good Economy
- Increasing Efficiency and Resilience

- Delivering the Homes to meet Brent's needs.

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

**Affected parties will include:**

- Residents of the borough and surrounding boroughs
- Visitors to the borough / tourists
- Businesses / employers/ employees
- Service providers of social infrastructure, and their service users e.g. health and social care facilities, education and childcare facilities, sports and recreation facilities, play facilities, community facilities and community groups
- Providers of physical infrastructure e.g. TFL, Network Rail, Cadent / National Grid, Thames and Affinity Water
- Statutory agencies such as the Environment Agency, Historic England, Natural England
- Developers and registered providers of social / intermediate / affordable housing (e.g. housing associations)
- London Borough of Brent departments and staff, including Children and Young People, Safeguarding, Housing, Adult Social Care, Public Health, Customer & Digital Services (including Revenue and Debt), Environment Services, Regeneration, Growth & Employment
- Councillors / elected members

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.

There is relevance to equality and the council's public sector equality duty as the policies within the Local Plan should remove or minimise disadvantages which are connected to characteristics of protected groups. The plan also aims to meet the needs of the borough, including protected groups. All of the Local Plan is relevant to equality, although some policies within the plan will have more relevance to certain protected groups than others. Overall, the Local Plan is relevant to all of the protected characteristics.

Consistent with the three aims of the general equality duty, the Local Plan aims to foster good relations, advance equality of opportunity, and eliminate unlawful discrimination.

The purpose of the Local Plan is to provide a vision for good growth and to achieve sustainable development (social sustainability, economic sustainability, and environmental sustainability) within the borough. This will ensure good growth from the years 2020 – 2041, to benefit the residents and businesses of Brent. The plan will operate within the context of fundamental changes to national planning policy (most recently in July 2018, with minor amendments in 2019) and significant changes to the London Plan, the latest Draft London Plan proposing a substantial increase in housing targets, plus employment floorspace targets and waste sites planning.

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	X	X
Sex	X	X	
Race	X	X	
Disability	X	X	X
Sexual orientation	X	X	
Gender reassignment	X	X	
Religion or belief	X	X	
Pregnancy or maternity	X	X	X
Marriage or Civil Partnership	X	X	

**Note: A full breakdown of any impacts of each of the individual proposed policies is attached in Appendix 1.**

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 <b>change</b> 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	
<b>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.</b>		

## 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.

The following source of information have been used to produce the Baseline Information for the Local Plan. A more detailed outline of this is available in Appendix 1 of the Integrated Impact Assessment.

### Population and Equality

- Census, 2001 and 2011
- Population Projections (Short Term), 2016, GLA
- Joint Strategic Needs Assessment (JSNA), 2015, London Borough of Brent
- Strategic Housing Market Assessment, October 2018, London Borough of Brent
- Equality Profile of Brent, Brent Open Data, 2019
- GLA Housing-Led Ethnic Group Projections, GLA, 2016
- GLA Population by Country of Birth, GLA, 2018
- Population Change in Brent, Brent Open Data, 2019

### Education

- Joint Strategic Needs Assessment (JSNA), 2015, London Borough of Brent
- Annual School Standards and Achievement Report, 2017-2018
- Brent School Place Planning Strategy (June 2017 refresh), 2019-2024, London Borough of Brent
- Statistic: special education needs (SEN), Statistics at Department for Education

### Health and Well-Being

- Brent Health and Wellbeing Strategy, 2014-2017, London Borough of Brent
- Annual Public Health Report
- A Physical Activity Strategy for Brent, 2016-2021, London Borough of Brent
- Local Authority Health Profiles – Brent, 2019, Public Health England
- Joint Strategic Needs Assessment (JSNA), 2015, London Borough of Brent
- Childhood Obesity, 28 February 2018, Brent Community Wellbeing Scrutiny Committee

### Crime

- Safer Brent Community Safety Strategy, 2018-2021, London Borough of Brent
- Residents Attitudes Survey, 2018
- Safer Brent Partnership Annual Report 2018/2019, Safer Brent Partnership

### Water

- Joint West London Strategic Flood Risk Assessment – Level 1
- Strategic Flood Risk Assessment - Level 2
- Surface Water Management Plan, 2011
- Flood Risk Management Strategy

- Brent River Corridor Improvement Plan, (2014), Brent Catchment Partnership
- Thames River Basin Management Plan, Environment Agency

#### Air Quality

- Air Quality Action Plan, 2017- 2022
- Air Quality Annual Status Reports

#### Soils and Geology

- All London Green Grid, DRAFT Brent Valley and Barnet Plateau Area Framework, GLA and Design for London Borough of Brent
- Contaminated Land Database, London Borough of Brent
- Contaminated Land Inspection Strategy, London Borough of Brent

#### Climate Change

- Climate Change Strategy and supporting evidence document, London Borough of Brent
- Joint West London Strategic Flood Risk Assessment
- Climate Just - [www.climatejust.org.uk](http://www.climatejust.org.uk)

#### Biodiversity

- Brent Review of Sites of Importance for Nature Conservation

#### Heritage Assets (Architectural and Archaeological)

- Brent Heritage Asset webpage, London Borough of Brent
- The National Heritage List for England, Historic England
- Heritage at Risk Register, Historic England
- London Parks and Gardens National inventory
- Historic Environment Place-Making Strategy (and appendices), 2019, London Borough of Brent

#### Landscape and Townscape

- Townscape analysis for the Development Management Policies DPD Preferred Options, 2007
- All London Green Grid SPG, 2012, GLA
- All London Green Grid, DRAFT Brent Valley and Barnet Plateau Area Framework, GLA Design for London Borough of Brent
- Brent Historic Environment Place-Making Strategy, 2019, London Borough of Brent
- Tall Building Strategy, 2019, London Borough of Brent
- Open Space Study, 2019, London Borough of Brent

#### Waste

- Annual Monitoring Reports, London Borough of Brent
- Joint West London Waste Plan
- The London Plan (Intend to Publish), 2019, GLA

#### Transportation

- Brent Long Term Transport Strategy, 2015-2035, London Borough of Brent
- Brent Cycle Strategy, 2016-2021, London Borough of Brent

- Brent Walking Strategy, 2017-2022, London Borough of Brent
- WebCAT, Transport for London
- Parking Strategy, 2015, London Borough of Brent
- WestTrans Delivery and Servicing Plan Guidance
- Brent Council Annual Parking Reports
- Brent Local Implementation Plan 2019-2041, London Borough of Brent

#### Noise

- London Noise Mapping Service – [www.londonnoisemap.com](http://www.londonnoisemap.com)

#### Local Economy

- Employment Land Demand Study, 2015, ORS
- Brent Workspace Study, 2017, Regeneris
- Retail & Leisure Needs Study, 2018, Urban Shape
- ONS Annual Population Survey, ONS
- GLA Brent London Borough Employment, GLA
- Brent Responsible Growth Strategy, RGS
- Annual Monitoring Reports
- NOMIS Official Labour Market Statistics
- NOMIS Labour Market Profile (Brent), 2019, NOMIS

#### Deprivation

- Index of Multiple Deprivation, 2019
- Joint Strategic Needs Assessment (JSNA), 2015, London Borough of Brent
- Sub Regional Fuel Poverty Data, 2017, Department for Business, Energy and Industrial Strategy
- End Child Poverty - [endchildpoverty.org.uk](http://endchildpoverty.org.uk)
- Children in Poverty for Boroughs and Wards in London dataset, updated 2019, HMRC
- Brent Inclusive Growth Strategy Research Base, 2019, London Borough of Brent

#### Housing

- Census, 2001 and 2011
- Housing Benefit caseload statistics
- Strategic Housing Market Assessment (SHMA), 2018, ORS
- GLA Brent Borough Profile, 2017
- West London Gypsy and Traveller Accommodation Assessment, 2018, ORS
- Brent Inclusive Growth Strategy Research Base, 2019, London Borough of Brent
- House Price Index, House Price Statistics, 2019, HM Land Registry

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”.

<b>AGE</b>	
<b>Details of impacts identified</b>	<p>The impact of the implementation of the following policies has been identified by taking into account population projections, equalities information, deprivation statistics and other studies as outlined in Section B (1).</p> <p>An explanation as to how these conclusions have been reached can be found in the Integrated Impact Assessment (IIA), whereby the impact of each policy has been considered against a number of objectives, including in relation to equality.</p> <p><b>The following policies within the Local Plan have been identified as having a positive impact on the protected characteristic of age:</b></p> <p>BCGA1, BNGA1, BSGA1, BSEGA1, BSWGGA1, BD1, BH2, BH4, B5, BH7, BH8, BH11, BH12, BH13, BE5, BE6, BE7, BHC4, BHC5, BGI1, BGI2, BSUI1, BSUI2, BT1, BT3, BT4, DMP1, BP1, BP2, BP3, BP4, BP5, BP6, BP7</p> <p><b>The following policies within the Local Plan have been identified as having a neutral impact on the protected characteristic of age:</b></p> <p>BD2, BH1, BH6, BH10, BE1, BE2, BE3, BE4, BE8, BE9, BHC2, BHC3, BSUI3, BSUI4, BT2, BSI1</p> <p><b>The following policies within the Local Plan have been identified as having a mixed or uncertain impact on the protected characteristic of age:</b></p> <p>BH3, BH9</p> <p><b>The following policies within the Local Plan have been identified as having a negative impact on the protected characteristic of age:</b></p> <p>BHC1</p>
<b>DISABILITY</b>	
<b>Details of impacts identified</b>	<p>The impact of the implementation of the following policies has been identified by taking into account population projections, equalities information, deprivation statistics and other studies as outlined in Section B (1).</p> <p>An explanation as to how these conclusions have been reached can be found in the Integrated Impact Assessment (IIA), whereby the</p>

	<p>impact of each policy has been considered against a number of objectives, including in relation to equality.</p> <p><b>The following policies within the Local Plan have been identified as having a positive impact on the protected characteristic of disability:</b></p> <p>BCGA1, BNGA1, BSGA1, BSEGA1, BSWGA1, BD1, BH3, BH4, BH5, BH6, BH7, BH8, BH10, BH12, BH13, BE2, BE3, BE5, BE6, BE7, BE9, BT1, BT3, BT4, DMP1, BP1, BP2, BP3, BP4, BP5, BP6, BP7</p> <p><b>The following policies within the Local Plan have been identified as having a neutral impact on the protected characteristic of disability:</b></p> <p>BD2, BH1, BH11, BE1, BE4, BE8, BHC2, BHC3, BHC4, BHC5, BGI1, BGI2, BSUI1, BSUI2, BSUI3, BSUI4, BT2, BSI1</p> <p><b>The following policies within the Local Plan have been identified as having a mixed or uncertain impact on the protected characteristic of disability:</b></p> <p>BH2, BH9</p> <p><b>The following policies within the Local Plan have been identified as having a negative impact on the protected characteristic of disability:</b></p> <p>BHC1</p>
<b>RACE</b>	
<p><b>Details of impacts identified</b></p>	<p>The impact of the implementation of the following policies has been identified by taking into account population projections, equalities information, deprivation statistics and other studies as outlined in Section B (1).</p> <p>An explanation as to how these conclusions have been reached can be found in the Integrated Impact Assessment (IIA), whereby the impact of each policy has been considered against a number of objectives, including in relation to equality.</p> <p><b>The following policies within the Local Plan have been identified as having a positive impact on the protected characteristic of race:</b></p> <p>BCGA1, BNGA1 BSGA1, BSEGA1, BSWGA1, BD1, BH2, BH4, BH5, BH6, BH9, BH10, BH11, BH12, BH13, BE1, BE3, BHC3, BHC4, BHC5, BT3, BT4, DMP1, BP1, BP2, BP3, BP4, BP5, BP6, BP7</p> <p><b>The following policies within the Local Plan have been identified as having a neutral impact on the protected characteristic of race:</b></p>



	<p>BD2, BH1, BH7 BH8, BE2, BE4, BE5, BE6, BE7, BE8, BE9, BHC1, BHC2, BGI1, BGI2, BSUI1, BSUI2, BSUI3, BSUI4, BT1, BT2, BSI1</p> <p><b>The following policies within the Local Plan have been identified as having a mixed or uncertain impact on the protected characteristic of race:</b></p> <p>BH3</p> <p><b>The following policies within the Local Plan have been identified as having a negative impact on the protected characteristic of race:</b></p> <p>None</p>
<b>SEX</b>	
<b>Details of impacts identified</b>	<p>The impact of the implementation of the following policies has been identified by taking into account population projections, equalities information, deprivation statistics and other studies as outlined in Section B (1).</p> <p>An explanation as to how these conclusions have been reached can be found in the Integrated Impact Assessment (IIA), whereby the impact of each policy has been considered against a number of objectives, including in relation to equality.</p> <p><b>The following policies within the Local Plan have been identified as having a positive impact on the protected characteristic of sex:</b></p> <p>BSGA1, BNGA1, BCGA1, BSEGA1, BSWGGA1, BD1, BH2, BH4, BH5, BH7, BE1, BE2, BE3, BT3, BT4, DMP1, BP1, BP2, BP3, BP4, BP5, BP6, BP7</p> <p><b>The following policies within the Local Plan have been identified as having a neutral impact on the protected characteristic of sex:</b></p> <p>BD2, BH1, BH6, BH8, BH10, BH11, BH12, BH13, BE4, BE5, BE6, BE7, BE8, BE9, BHC1, BHC2, BHC3, BHC4, BHC5, BGI1, BGI2, BSUI1, BSUI2, BSUI3, BSUI4, BT1, BT2, BSI1</p> <p><b>The following policies within the Local Plan have been identified as having a mixed or uncertain impact on the protected characteristic of sex:</b></p> <p>BH3, BH9</p> <p><b>The following policies within the Local Plan have been identified as having a negative impact on the protected characteristic of sex:</b></p>

	None
<b>SEXUAL ORIENTATION</b>	
<b>Details of impacts identified</b>	<p>The impact of the implementation of the following policies has been identified by taking into account population projections, equalities information, deprivation statistics and other studies as outlined in Section B (1).</p> <p>An explanation as to how these conclusions have been reached can be found in the Integrated Impact Assessment (IIA), whereby the impact of each policy has been considered against a number of objectives, including in relation to equality.</p> <p><b>The following policies within the Local Plan have been identified as having a positive impact on the protected characteristic of sexual orientation:</b></p> <p>BCGA1, BNGA1, BSGA1, BSEGA1, BSWGGA1, BD1, BHC3, BHC4, BHC5, BT3, BT4, DMP1, BP1, BP2, BP3, BP4, BP5, BP6, BP7</p> <p><b>The following policies within the Local Plan have been identified as having a neutral impact on the protected characteristic of sexual orientation:</b></p> <p>BD2, BH1, BH2, BH5, BH6, BH7, BH8, BH10, BH11, BH12, BH13, BE1, BE2, BE3, BE4, BE5, BE6, BE7, BE8, BE9, BHC1, BHC2, BGI1, BGI2, BSUI1, BSUI2, BSUI3, BSUI4, BT1, BT2, BSI1</p> <p><b>The following policies within the Local Plan have been identified as having a mixed or uncertain impact on the protected characteristic of sexual orientation:</b></p> <p>BH3, BH4, BH9</p> <p><b>The following policies within the Local Plan have been identified as having a negative impact on the protected characteristic of sexual orientation:</b></p> <p>None</p>
<b>PREGANCY AND MATERNITY</b>	

<p><b>Details of impacts identified</b></p>	<p>The impact of the implementation of the following policies has been identified by taking into account population projections, equalities information, deprivation statistics and other studies as outlined in Section B (1).</p> <p>An explanation as to how these conclusions have been reached can be found in the Integrated Impact Assessment (IIA), whereby the impact of each policy has been considered against a number of objectives, including in relation to equality.</p> <p><b>The following policies within the Local Plan have been identified as having a positive impact on the protected characteristic of pregnancy and maternity:</b></p> <p>BCGA1, BNGA1, BSGA1, BSEGA1, BSWGGA1, BD1, BH4, BH5, BH6, BH10, BH11, BH13, BE2, BE5, BE6, BE7, BGI1, BGI2, BSUI2, BT1, BT3, BT4, DMP1, BP1, BP2, BP3, BP4, BP5, BP6, BP7</p> <p><b>The following policies within the Local Plan have been identified as having a neutral impact on the protected characteristic of pregnancy and maternity:</b></p> <p>BD2, BH1, BH7, BH8, BH12, BE1, BE3, BE4, BE8, BE9, BHC2, BHC3, BHC4, BHC5, BSUI1, BSUI3, BSUI4, BT2, BS11</p> <p><b>The following policies within the Local Plan have been identified as having a mixed or uncertain impact on the protected characteristic of pregnancy and maternity:</b></p> <p>BH2, BH3, BH9</p> <p><b>The following policies within the Local Plan have been identified as having a negative impact on the protected characteristic of pregnancy and maternity:</b></p> <p>BHC1</p>
<p><b>RELIGION OR BELIEF</b></p>	
<p><b>Details of impacts identified</b></p>	<p><b>The following policies within the Local Plan have been identified as having a positive impact on the protected characteristic of religion or belief:</b></p> <p>BCGA1, BNGA1, BSGA1, BSEGA1, BSWGGA1, BD1, BH6, BH7, BHC3, BT3, BT4, DMP1, BP1, BP2, BP3, BP4, BP5, BP6, BP7</p> <p><b>The following policies within the Local Plan have been identified as having a neutral impact on the protected characteristic of religion or belief:</b></p>

	<p>BD2, BH1, BH2, BH5, BH8, B10, BH11, BH12, BH13, BE1, BE2, BE3, BE4, BE5, BE6, BE7, BE8, BE9, BHC1, BHC2, BHC3, BHC4, BHC5, BGI1, BGI2, BSUI1, BSUI2, BSUI3, BSUI4, BT1, BT2, BSI1</p> <p><b>The following policies within the Local Plan have been identified as having a mixed or uncertain impact on the protected characteristic of religion or belief:</b></p> <p>BH3, BH4, BH9</p> <p><b>The following policies within the Local Plan have been identified as having a negative impact on the protected characteristic of religion or belief:</b></p> <p>None</p>
<b>GENDER REASSIGNMENT</b>	
<b>Details of impacts identified</b>	<p>The impact of the implementation of the following policies has been identified by taking into account population projections, equalities information, deprivation statistics and other studies as outlined in Section B (1).</p> <p>An explanation as to how these conclusions have been reached can be found in the Integrated Impact Assessment (IIA), whereby the impact of each policy has been considered against a number of objectives, including in relation to equality.</p> <p><b>The following policies within the Local Plan have been identified as having a positive impact on the protected characteristic of gender reassignment:</b></p> <p>BCGA1, BNGA1, BSGA1, BSEGA1, BSWGGA1, BD1, BH2, BH4, BH5 BT3, BT4, DMP1, BP1, BP2, BP3, BP4, BP5, BP6, BP7</p> <p><b>The following policies within the Local Plan have been identified as having a neutral impact on the protected characteristic of gender reassignment:</b></p> <p>BD2, BH1, BH6, BH7, BH8, BH10, BH11, BH12, BH13, BE1, BE2, BE3, BE4, BE5, BE6, BE7, BE8, BE9, BHC1, BHC2, BHC3, BHC4, BHC5, BGI1, BGI2, BSUI1, BSUI2, BSUI3, BSUI4, BT1, BT2, BSI1</p> <p><b>The following policies within the Local Plan have been identified as having a mixed or uncertain impact on the protected characteristic of gender reassignment:</b></p> <p>BH3, BH9</p> <p><b>The following policies within the Local Plan have been identified as having a negative impact on the protected characteristic of gender reassignment:</b></p>

	None
<b>MARRIAGE &amp; CIVIL PARTNERSHIP</b>	
<b>Details of impacts identified</b>	<p>The impact of the implementation of the following policies has been identified by taking into account population projections, equalities information, deprivation statistics and other studies as outlined in Section B (1).</p> <p>An explanation as to how these conclusions have been reached can be found in the Integrated Impact Assessment (IIA), whereby the impact of each policy has been considered against a number of objectives, including in relation to equality.</p> <p><b>The following policies within the Local Plan have been identified as having a positive impact on the protected characteristic of marriage and civil partnership:</b></p> <p>DMP1, BT3, BT4, BD1, BP1, BCGA1, BP2, BP3, BNGA1, BP4, BP5, BSGA1, BP6, BPSEGA1, BP7, BSWG1</p> <p><b>The following policies within the Local Plan have been identified as having a neutral impact on the protected characteristic of marriage and civil partnership:</b></p> <p>BE1, BE2, BE3, BE4, BE5, BE6, BE7, BE8, BE9, BGI1, BGI1, BGI2, BSUI1, BSUI2, BSUI3, BSUI4, BT1, BT2, BD2, BD3, BH1, BH2, BH5, BH6, BH7, BH8, BH10, BH11, BH12, BH13, BHC1, BHC2, BHC3, BHC4, BHC5, BSI1</p> <p><b>The following policies within the Local Plan have been identified as having a mixed or uncertain impact on the protected characteristic of marriage &amp; civil partnership:</b></p> <p>BH3, BH4, BH9</p> <p><b>The following policies within the Local Plan have been identified as having a negative impact on the protected characteristic of marriage and civil partnership:</b></p> <p>None</p>

3. Could any of the impacts you have identified be unlawful under the Equality Act 2010?

It is not considered that any of the impacts identified would be unlawful under the Equality Act 2010.

It is not considered that any of the policies would result in discrimination, harassment or victimisation. Additionally, it is considered that the plan will help to advance equality of opportunity and will help to foster good relations between groups.

The potential negative impacts of Policy BHC1 (Brent's heritage assets) have been discussed in Section 6 below.

4. Were the participants in any engagement initiatives representative of the people who will be affected by your proposal and is further engagement required?

A series of consultation events took place throughout 2017 and 2018 to gather evidence on Local Plan Issues and Options. The findings of these consultations then helped to inform the content of the "Brent Local Plan Preferred Options" document, which was consulted on from 8<sup>th</sup> November 2018 for 8 weeks.

For the Issues and Options Consultation (8<sup>th</sup> February – 22<sup>nd</sup> March 2018) stage, responses were collected by two mechanisms: one through responses to particular questions raised in the Issues and Options document (which could be responded to via internet or questionnaire) or via email / mail. Additionally, an interactive map allowed people to identify areas and make comments. Over 120 people / organisations responded to the online questionnaire / via email. 110 additional people / organisations registered but didn't end up responding. There were 404 visitors to the interactive map. 81 commented and 216 read in detail comments made. A number of drop in events also took place. In addition workshops were held across the borough and targeted workshops with young people, families with young children and Disability Rights and Politics (DRAP) Brent.

Only a small number of respondents to the consultation questions set out their anonymous demographic profile. This does give an indication of their characteristics, but the sample was so small that on many elements no substantive conclusions can be drawn from it. 83% of respondents lived in the borough. The proportion of males was slightly higher than the borough 51/49 split. Only 4% of respondents were under 24 compared to 25% of the borough's population. 48% were white British, compared to 36% in the borough (borough comparisons from the 2011 Census). 30% had no religion compared to 11% in the borough. Christians were 25% compared to 48% in the borough. The targeted workshops helped to increase responses from groups underrepresented in the consultation questions, including young people and disabled people.

A further draft Local Plan consultation took place from 8 November 2018 until 3 January 2019, and built on a range of options set out in the previous draft. The document and a questionnaire were available online. Hard copies were available in a number of borough libraries and 8 public consultation events took place, in addition to events with DRAP Brent, Brent Youth Parliament and a Developers' Forum. Contacts on the Local Plan consultation database were emailed, which includes a list of statutory consultees, adjacent boroughs and those who have expressed an interest in being kept informed. In addition, posters were put in park notice boards, the Brent Citizen's Panel were emailed, and emails were sent to partner contacts e.g. Brent Housing Partnership and CVS Brent. The public consultation events attracted approximately 185 people, producing 310 post-it comments. Willesden Green Library and Brent Civic Centre were the most popular venues, attracting 60 and 40 people respectively. Additionally, the informal drop-ins attracted around 120 people. The majority of representations were made through online survey, with 173 respondents. The

remainder were sent by email (86) and a petition of 537 signatures. Once again, only a small number of respondents set out their anonymous demographic profile.

Further engagement took place through the Regulation 19 stage of consultation (publication of the final draft Local Plan). This stage of consultation took place for 6 weeks from 24 October 2019 until 5 December 2019. Once again, this allowed all stakeholders, including residents and organisations, to provide comments. This stage of consultation related to the 'soundness' of the Plan and comments received have therefore helped the council address potential flaws in the Plan. As before, emails were sent to all those registered on the Local Plan consultation database. Six 'drop in' sessions took place within local libraries across the borough, each lasting 3 hours. This gave the public the chance to speak with the team on issues face to face. In terms of numbers, approximately 10 people engaged at each session. However, there was a constant presence from the public at each session, enabling those who did attend to voice their concerns in detail. An online questionnaire was also available which was completed by 16 respondents. Copies of the Plan, including an easy read version, were made available in all the public libraries for members of the public to read. The majority of responses were received via email, of which there were 58. Most responses were received from organisations. Once again, only a small number of respondents set out their anonymous demographic profile. As such, an analysis of the equalities information of respondents has not been carried out.

The next stage is for the draft Local Plan to be submitted to the government for independent examination along with a schedule of the modifications proposed as a result of the previous stage of consultation.

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

Analysis will be undertaken into the representativeness of responses received through the next stage of consultation. As with previous consultations, attempts will be made to engage with as many residents as possible, including those with protected characteristics.

Additionally, as more up to date information on population projections or the needs of the borough (including the protected characteristics) become available, the Local Plan's Integrated Impact Assessment will be updated to take into account of this.

However, this updated data will not feed into this Local Plan. Any future data and needs are therefore to be taken into account in any future reviews of the Local Plan.

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

The only policy which is considered to have a negative impact on any of the groups is policy BHC1. This policy is considered to have a potential negative impact on the following protected characteristics: pregnancy & maternity, disability, and age.

Policy BHC1 – Heritage Assets

Policy BHC1 relates to Brent's heritage assets and seeks to ensure protection and enhancement of these assets. The policy requires any proposals affecting a heritage asset to provide analysis and justification of the potential impact (including incremental and cumulative)

of the development on the heritage asset, and to sustain and enhance the significance of the heritage asset.

Brent's heritage assets make a substantial contribution to the borough's character and distinctiveness. The borough contains a number of statutory listed buildings, conservation areas and registered parks and gardens. Once lost or detrimentally altered, heritage assets cannot be easily reinstated and policy BHC1 seeks to protect them. Very infrequently, this may result in buildings / places not being able to be adapted to meet the needs of those with limited mobility due to the potential harm that it would cause to the heritage asset, although these circumstances are reducing as more innovative ways of dealing with matters are delivered.

The National Planning Policy Framework (NPPF) requires that the impact of a proposed development on the significance of a designated heritage asset be considered, and the more important the asset, the greater the weight should be. However, where a development proposal leads to less than substantial harm to the heritage asset's significant, the harm should be weighed up against the public benefits of the proposed building, where appropriate, securing its optimum viable use. Brent's policies are required to be in general conformity with the NPPF and the London Plan.

Historic England have produced guidance on how to sensitively improve access to historic buildings and landscapes (available at <https://historicengland.org.uk/advice/technical-advice/easy-access-to-historic-buildings-and-landscapes/>). The guidance includes examples of best practice, such as the following:

- No1 Smithery, Chatham Historic Dockyard – a grade II\* listed building, the restoration of which included a new accessible public entrance with ramp and steps;
- St James Church, London – the church is located between Piccadilly and Jermyn street, which are sited on different levels. Level access was achieved by altering a window to form a doorway, which was in a 19<sup>th</sup> century addition to the original church and deemed less sensitive;
- Bank of England, London – installation of a new handrail which matches the existing design and materials.

Local examples of adaptations are Willesden Library, and Stonebridge School (grade II listed) which has had a lift installed and upgraded doorways, and Willesden Green Baptist Church, which has recently had detailed approved for a new front forecourt and entrance doors.

Any applications for development which will affect the accessibility of a heritage asset (and therefore groups with limited mobility) will be considered on a case by case basis regarding how best to balance the requirements of the Equality Act 2010 and listed building and planning legislation. The Principal Heritage and Conservation Officer has advised that he cannot identify any buildings that could not be adapted especially, and the council does try do look for solutions. As such, the risk of negative impacts is considered to be low.

The Council has a Statement of Community Involvement (SCI) which explains how local communities and other interested parties are involved in preparing planning policies and determining planning applications. The SCI states that applications for Listed Building Consent (required for works of demolition, alteration / extension to a listed building, which affect the building's character as a building of special architectural or historic interest) are required to be advertised on the Council's Website, a Site Notice is required to be put up, and Newspaper Advert Made. Consultation letters may be sent out depending on the scale and potential



impacts of the proposed development. Where relevant, neighbourhood forums and residents associations may also be consulted. Applications which affect listed buildings will therefore be open to consultation with opportunities for members of the public to comment. The SCI also states that the Council will seek to engage with groups representing the nine protected characteristics.

### Mixed and Unknown Impacts

Some policies have been identified as having mixed or unknown impacts. An action plan has not been identified for these, as the potential impacts are unknown or are a mix of negative and positive impacts, often due to a number of factors. These unknown and mixed impacts are listed below:

- BH2 – mixed impacts in relation to disability and pregnancy and maternity. The policy identifies priority areas for additional housing provision within Brent. Impacts are considered to be mixed, as the concentration of homes in certain areas or movement corridors may potentially increase exposure to higher concentrations of poor air quality, which may have a negative impact on pregnant women and disabled people. However, at the same time, these particular protected groups are more likely to have lower incomes, and will therefore have limited access to private vehicles and be more reliant on public transport. As such, prioritisation of homes in these particular areas will assist these groups.
- BH3 – mixed impacts in relation to age, race, sex, sexual orientation, pregnancy and maternity, religion or belief, gender reassignment, marriage and civil partnership. The policy seeks to encourage provision of Built to Rent properties within each Growth Area (excluding South Kilburn) or on development sites of 500 dwellings or more. Impacts are considered to be mixed as there is unlikely to be a significant differentiation between built to rent and owner occupation-led housing on these matters.
- BH4 – mixed or unknown impacts in relation to religion and belief, sexual orientation, marriage and civil partnership. The policy requires applications for small sites to be determined in accordance with London Plan Policy H2A, with the exception of Criterion A2, which in Brent will only apply within PTAL 3-6 locations. This is because some tube and railway stations have a poor level of access to viable public transport alternatives, employment and retail / other facilities to meet every day needs. However, London Plan policy H2's 800m buffer does not take such considerations into account. The mixed or unknown impacts are due to the policy being likely to reduce the potential capacity of homes delivered on these sites, which could be to the detriment of these protected groups in terms of meeting their housing needs.
- BH9 – uncertain impacts in relation to age, disability, sex, pregnancy and maternity, gender reassignment, sexual orientation, religion and belief, age. The policy states that the council will seek to accommodate identified needs for any additional pitches. Within Growth Areas (except South Kilburn) and developments of 1 hectare or more that will include new homes, the potential for the incorporation of a dedicated gypsy and travellers' site/s should be robustly considered as part of any required masterplanning / site design evolution process. The uncertain impacts above are because providing more gypsy and traveller sites could impact on provision of other affordable housing needs, as it could be argued that such provision impacts on development viability, or takes up considerably more space than an equivalent of mainstream affordable homes

to meet needs. As there is limited land and funding for affordable dwellings, this could have consequential adverse impacts on some groups with protected characteristics that are more likely to be reliant on mainstream affordable housing than the general population, which provision of traveller sites could reduce.

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

Through the adoption of the Local Plan, a number of monitoring indicators will be set in order to monitor the impacts of the Local Plan policies. The planning policy team produces an Annual Monitoring Report (AMR) through which these indicators will be monitored and reported on once a year. Monitoring of the policies can help inform future Local Plan policies (e.g. where a policy is working well or not, or may no longer be relevant).

## 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.

In conclusion, it is considered that the council has met its duties as a public sector body by the Equality Act 2010.

There will be a number of positive impacts on groups which fall under the 9 protected characteristics.

Although one of the policies may have a negative impact on the protected characteristics of age, disability and pregnancy and maternity (in relation to accessibility of heritage assets), the extent of this is unknown. Additionally, it is considered that the potential that heritage assets not being able to be adapted to meet the needs of those with limited mobility will occur infrequently, as policy requires any *less than substantial* harm to the heritage asset be weighed up against any public benefit, public benefit will be taken into account when considering applications for development affecting heritage assets.

Additionally, these circumstances are reducing as more innovative ways of dealing with matters are delivered, and it is unlikely that this policy will have a serious impact on those who may be affected. Some heritage assets may already be adapted to meet the needs to those with more limited mobility. Furthermore, the Principal Conservation and Heritage Officer has noted that he cannot identify any buildings that could not be adapted especially, and the council does try do look for solutions.

Since the previous version of the EA, the draft Local Plan has been through a further stage of consultation which provided an opportunity for residents (including groups with protected characteristics) to comment on the soundness of the plan and any legal implications. The plan now will be subject to scrutiny by the government / planning inspectorate. The Inspector who will be appointed to examine the plan can request modifications to be made the plan if necessary.

**SECTION D – RESULT**

<i>Please select one of the following options. Mark with an "X".</i>		
<b>A</b>	<b>CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED</b>	
<b>B</b>	<b>JUSTIFY AND CONTINUE THE POLICY/PROPOSAL</b>	<b>X</b>
<b>C</b>	<b>CHANGE / ADJUST THE POLICY/PROPOSAL</b>	
<b>D</b>	<b>STOP OR ABANDON THE POLICY/PROPOSAL</b>	

**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.

<b>Action</b>	<b>Expected outcome</b>	<b>Officer</b>	<b>Completion Date</b>
Publication of Local Plan for consultation	Comments to be received through consultation process		Winter 2019
Local Plan submitted to the government / Planning Inspectorate	Planning Inspector to be appointed to examine Local Plan		2020
Examination in Public (of Local Plan)	Planning Inspector to examine the proposed policies to determine if the plan is sound. Examination sessions will be open to all members of the public. Inspector may ask for additional information		2020
Possible modifications to be made to Local Plan	Changes to be made to Plan if required by the Inspector		2020
Adoption of Local Plan	The policies outlined in the Local Plan will now apply, any development proposals must now take into account these policies		2020
Monitoring of Local Plan	Monitoring through the AMR, to look at how well the council is performing in		On-going

	relation to agreed indicators. This will happen on a yearly basis.		
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**SECTION F – SIGN OFF**

Please ensure this section is signed and dated.

<b>OFFICER:</b>	Charlotte Ashton (07/02/2020)
<b>REVIEWING OFFICER:</b>	Paul Lewin
<b>HEAD OF SERVICE:</b>	Gerry Ansell (4/10/2019)

### Appendix 1: Full break down of impact of each policy on each protected characteristic

**Note:**

A score of “1” indicates a positive impact. “0” indicates a neutral impact, and “-1” indicates a negative impact. Where the impacts are mixed for each characteristic, or uncertain, these are described as “mix or uncertain”.

	Age	Sex	Sexual Orientation	Disability	Religion	Race	Marriage and Civil Partnership	Pregnancy and Maternity	Gender Reassignment
<b>BCGA1</b>	1	1	1	1	1	1	1	1	1
<b>BNGA1</b>	1	1	1	1	1	1	1	1	1
<b>BSGA1</b>	1	1	1	1	1	1	1	1	1
<b>BSEGA1</b>	1	1	1	1	1	1	1	1	1
<b>BSWG A1</b>	1	1	1	1	1	1	1	1	1
<b>BD1</b>	1	1	1	1	1	1	1	1	1
<b>BD2</b>	0	0	0	0	0	0	0	0	0
<b>BH1</b>	0	0	0	0	0	0	0	0	0
<b>BH2</b>	1	1	0	Mix or uncertain	0	1	0	Mix or uncertain	1
<b>BH3</b>	Mix or uncertain	Mix or uncertain	Mix or uncertain	1	Mix or uncertain	Mix or uncertain	Mix or uncertain	Mix or uncertain	Mix or uncertain
<b>BH4</b>	1	1	Mix or uncertain	1	Mix or uncertain	1	Mix or uncertain	1	1
<b>BH5</b>	1	1	0	1	0	1	0	1	1
<b>BH6</b>	0	0	0	1	1	1	0	1	0
<b>BH7</b>	1	1	0	1	1	0	0	0	0
<b>BH8</b>	1	0	0	1	0	0	0	0	0
<b>BH9</b>	Mix or uncertain	Mix or uncertain	Mix or uncertain	Mix or uncertain	Mix or uncertain	1	Mix or uncertain	Mix or uncertain	Mix or uncertain
<b>BH10</b>	0	0	0	1	0	1	0	1	0
<b>BH11</b>	1	0	0	0	0	1	0	1	0
<b>BH12</b>	1	0	0	1	0	1	0	0	0
<b>BH13</b>	1	0	0	1	0	1	0	1	0
<b>BE1</b>	0	1	0	0	0	1	0	0	0
<b>BE2</b>	0	1	0	1	0	0	0	1	0
<b>BE3</b>	0	1	0	1	0	1	0	0	0
<b>BE4</b>	0	0	0	0	0	0	0	0	0
<b>BE5</b>	1	0	0	1	0	0	0	1	0
<b>BE6</b>	1	0	0	1	0	0	0	1	0

<b>BE7</b>	1	0	0	1	0	0	0	1	0
<b>BE8</b>	0	0	0	0	0	0	0	0	0
<b>BE9</b>	0	0	0	1	0	0	0	0	0
<b>BSI1</b>	0	0	0	0	0	0	0	0	0
<b>BHC1</b>	-1	0	0	-1	0	0	0	-1	0
<b>BHC2</b>	0	0	0	0	0	0	0	0	0
<b>BHC3</b>	0	0	1	0	1	1	0	0	0
<b>BHC4</b>	1	0	1	0	0	1	0	0	0
<b>BHC5</b>	1	0	1	0	0	1	0	0	0
<b>BGI1</b>	1	0	0	0	0	0	0	1	0
<b>BGI2</b>	1	0	0	0	0	0	0	1	0
<b>BSUI1</b>	1	0	0	0	0	0	0	0	0
<b>BSUI2</b>	1	0	0	0	0	0	0	1	0
<b>BSUI3</b>	0	0	0	0	0	0	0	0	0
<b>BSUI4</b>	0	0	0	0	0	0	0	0	0
<b>BT1</b>	1	0	0	1	0	0	0	1	0
<b>BT2</b>	0	0	0	0	0	0	0	0	0
<b>BT3</b>	1	1	1	1	1	1	1	1	1
<b>BT4</b>	1	1	1	1	1	1	1	1	1
<b>DMP1</b>	1	1	1	1	1	1	1	1	1
<b>BP1</b>	1	1	1	1	1	1	1	1	1
<b>BP2</b>	1	1	1	1	1	1	1	1	1
<b>BP3</b>	1	1	1	1	1	1	1	1	1
<b>BP4</b>	1	1	1	1	1	1	1	1	1
<b>BP5</b>	1	1	1	1	1	1	1	1	1
<b>BP6</b>	1	1	1	1	1	1	1	1	1
<b>BP7</b>	1	1	1	1	1	1	1	1	1

**List of Policies:**

<b>Policy Ref</b>	<b>Chapter</b>	<b>Policy Name</b>
DMP1	-	Development Management General Policy
BP1	Central	Central
BCGA1	Central	Wembley Growth Area
BP2	East	East
BP3	North	North
BNGA1	North	Burnt Oak / Colindale Growth Area
BP4	North West	North West
BP5	South	South
BSGA1	South	Church End Growth Area
BP6	South East	South East
BPSEGA1	South East	South Kilburn Growth Area
BP7	South West	South West
BSWGA1	South West	Alperton Growth Area

BD1	Design	Leading the Way in Good Urban Design
BD2	Design	Tall Buildings in Brent
BD3	Design	Basement Development
BH1	Housing	Increasing housing supply in Brent
BH2	Housing	Priority areas for additional housing provision within Brent
BH3	Housing	Build to rent
BH4	Housing	Small sites and small housing developments in Brent
BH5	Housing	Affordable housing
BH6	Housing	Housing size mix
BH7	Housing	Accommodation with shared facilities or additional support
BH8	Housing	Specialist older persons housing
BH9	Housing	Gypsy and Traveller accommodation
BH10	Housing	Resisting housing loss
BH11	Housing	Conversion of family sized dwellings
BH12	Housing	Residential outbuildings
BH13	Housing	Residential amenity space
BSI1	Social Infrastructure and Community Facilities	Social Infrastructure & Community Facilities
BE1	Economy and Town Centres	Economic Growth and Employment Opportunities for all
BE2	Economy and Town Centres	Strategic Industrial Location (SIL) and Locally Significant Industrial Sites (LSIS)
BE3	Economy and Town Centres	Local Employment Sites and Work-Live
BE4	Economy and Town Centres	Supporting Strong Centres
BE5	Economy and Town Centres	Protecting retail in town centres
BE6	Economy and Town Centres	Neighbourhood Parades and isolated shop units
BE7	Economy and Town Centres	Shopfront design and forecourt trading
BE8	Economy and Town Centres	Markets and car boot sales
BE9	Economy and Town Centres	Visitor accommodation and attractions
BHC1	Heritage and Culture	Brent's heritage assets
BHC2	Heritage and Culture	National Stadium Wembley
BHC3	Heritage and Culture	Supporting Brent's culture and creative industries
BHC4	Heritage and Culture	Brent's night time economy
BHC5	Heritage and Culture	Public Houses
BGI1	Green Infrastructure	Green and Blue Infrastructure in Brent
BGI2	Green Infrastructure	Trees and woodlands
BSUI1	Sustainable Infrastructure	Creating a resilient and efficient Brent
BSUI2	Sustainable Infrastructure	Air Quality
BSUI3	Sustainable Infrastructure	Managing flood risk
BSUI4	Sustainable Infrastructure	On site water management and surface water attenuation
BT1	Transport	Sustainable travel choice

BT2	Transport	Parking and car free development
BT3	Transport	Freight and servicing
BT4	Transport	Forming an access onto a road