

F1457 A1 Equality Impact Assessment (EqIA) form

N.B: the completed form should be emailed to the [Diversity and Inclusion team](#)

Project * Programme Strategy Policy*	Sudbury Town Station Car Park Development (Pocket Homes)
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Accountable	Property Development Manager	David Wakeford
	Signature	Date 27/09/2019

Produced By	Planning Advisor	Luke Burroughs
	Signature	Date 27/09/2019

Reviewed By		
	Signature	Date
	Job Title	Name
	Signature	Date

Document History	Version	Date	Summary of changes
	0.1	12/03/2020	First version sign off

* Delete as appropriate (the Accountable person should always be at least one management level higher than the Responsible person).

Project Related Documents	Doc No.	Document title	Relevant Section(s) of this Document



Step 1: Clarifying Aims

Q1. Outline the aims/objectives/scope of this piece of work

Sudbury Town Station is located within the London Borough of Brent. The station was constructed in 1931 and includes an 101-space car park that is adjacent to the station. A TfL car parking survey carried out in August 2017 identified that the car park is underutilised with an average occupancy of just 25 cars (weekdays) and 10 cars (weekends). Further to this, the average distance travelled by car park users was 17.14 kilometres and 20% of car park users travelled by car for over an hour to reach the car park. The survey also found that 97% of car park users passed closer TfL or Network Rail stations on their car journey to the station car park.

Given this low level of occupation and the average distance travelled by users of the car park, it is considered appropriate that TfL bring the car park forward for the development of affordable homes. TfL PD have identified the station car park as suitable for the delivery of an 100% affordable housing scheme in line policy with the National Planning Policy Framework, the Mayors Transport Strategy and Draft London Plan all of which which encourage development on Brownfield land in accessible locations and particularly underutilised car parks. Brent has high demand for affordable housing with the boroughs Strategic Housing Market Assessment (2016) identifying that there is a need to deliver 21,700 affordable homes in the borough between 2014 and 2037.

The existing layout of the car park can be found in Appendix 1 and the proposed new block plan can be found in appendix 2. The car park is approximately 500m away from Sudbury Town Centre and with a range of other car parking options nearer to the centre (including on street parking on Harrow Road and 95 space car park adjacent to Wembley Football Club which is 200m from the town centre).

While Brent has not specifically allocated the site for development within current local planning policy documents, the site has an allocation for 30 homes in the Brent Regulation 18 draft Local Plan (allocation BSWA13). This demonstrates that the borough has accepted the principal that residential development should come forward on the car park. Further to this, the the site can be considered suitable for development in line with National Planning Policy Framework (paragraphs 108 and 118d) and Draft London Plan (Policies H1, D1A, D1B and D8). The Mayors Transport Strategy supports the development of underutilised car parks in accessible locations adjacent to transport infrastructure in order to lower private car use and meet modal shift targets.

Both the GLA and TfL have undertaken equalities impacts assessments on the Draft London Plan and Mayors Transport Strategy. These documents consider the impacts of the policies which promote development on such sites on the key 'protected characteristics' in the Equality Act 2010, on which the analysis is based and mitigating actions are proposed. The documents have concluded that the overall impact of implementing the policies and guidance within these documents will be positive on who live and work in London, including those across the 9 protected characteristics.

In September 2017, Pocket was selected by TfL to deliver affordable homes on TfL small sites. After this, TfL carried out site analysis and Sudbury town station car park was selected as a development opportunity in line with Draft London Plan and National planning policy. The principal business objectives for the development are as follows:

- Develop new Pocket affordable homes targeted at people who live and work in the borough on under utilised car park.
- Retain blue badge car parking spaces to serve step-free access station.

Programme Milestones are:

2017: Selection of development Partner Pocket to deliver the affordable homes.

April 2019: Public consultation on planning application

July 2019: Submit Planning Application

March 2021: Start on Site.

This document assesses the equalities impact of the closure of the car park and proposed development, drawing out a profile of the surrounding area and assessing the impacts on local communities (especially focusing on those with protected characteristics) and TfL customers in the pre-construction phase, construction phase and post construction phase of the project.



Q2. Does this work impact on staff or customers? Please provide details of how.

The proposed development will impact upon both Staff and Customers.

Staff

Staff will be minimally impacted by the development. Staff Car Parking Spaces are outside the red line boundary for the application and will be retained and available through the construction work and the development will not impact upon rail operations. There is a small yard to the rear of the car park which is used for railway related works but a 3 meter wide access through the car park to the yard will be retained during and post construction.

It is anticipated that staff may be impacted by noise and construction traffic during construction. However, a construction method statement will be prepared setting out how noise, dust and traffic impacts will be minimised.

Customers

In November 2018 Pocket presented the proposed development to the local community and gave an opportunity for the public (including individuals and community groups) to provide feedback. Customers were generally supportive of the development, but concerns were raised over the loss of the car parking, particularly the blue badge spaces as the station is important in providing step-free access to the Piccadilly line. Local people were also concerned that the development may cause overlooking into back gardens on Barham Close and Station Approach and not respect the design of the listed station building.

The three blue badge spaces in the station will be retained. The remaining commuter spaces in the car park will be used for residential development. In addition, the station is served by two further blue badge spaces adjacent to the station entrance on Orchard Gate which will be retained. This decrease in car parking spaces at stations is in line with objectives on modal shift and increasing the use of public transport set out in the Mayors Transport Strategy and Draft London Plan which aim for 80% of all journeys to be carried out by walking, cycling or public transport by 2041. The development will improve surveillance of the three retained blue badge spaces.

Minimal disruption to customers is expected during the construction period with the station entrance and step free access remaining available and key pedestrian linkages remaining open. A construction method statement will be provided with the planning application identifying how issues relating to noise, dust and other construction issues would be mitigated.

Overall the development will have a positive impact on customers. It will also have a positive impact on the community by providing an 100% affordable housing development which will be made available to local people with a connection to the LB borough of Brent (living or working within the borough).

Step 2: The Evidence Base

Q3. Record here the data you have gathered about the diversity of the people potentially impacted by this work. You should also include any research on the issues affecting inclusion in relation to your work

Consider evidence in relation to all relevant protected characteristics;

- Age
- Disability including carers¹
- Gender
- Gender reassignment
- Marriage/civil partnership
- Other – refugees, low income, homeless people
- Pregnancy/maternity
- Race
- Religion or belief
- Sexual orientation

To date, the concept of development has been established and we have consulted with key officer and elected representatives of the London Borough of Brent as well as from around Transport for London. Pocket and TfL presented the development to local community and gave an opportunity for individuals and community groups to feedback.

We will continue work with borough contacts and stakeholder engagement team to identify stakeholder groups including equality groups in the local area which are harder to reach, and we will update future EQIA's with our method and progress.

We have sourced demographic data from a range of locations (including Census, LB Brent, GLA and NHS data). This data has revealed key statistics which it will important to take into account of in all stages of the proposed development.

Age

LB Brent (2011) Census data identifies that the Sudbury Ward has the following age profile.

Topic	Selected categories	2001	2011	Rank 2001	Rank 2011	Rank Change
Total population	Population count	12,308	14,950	12	12	—
Broad age groups	0 to 4	6.6%	7.6%	5	7	▼
	5 to 19	17.4%	17.4%	15	12	▲
	20 to 44	43.8%	44.3%	9	9	—
	45 to 64	19.5%	20.2%	11	17	▼
	65 plus	12.7%	10.5%	7	11	▼

62% of the population is between the ages of 5-44 and 44.3% is between the ages of 20 to 44. These categories produce the most demand for the Pocket product of discounted market sale affordable housing and therefore it is anticipated that there will be high demand for this product. This is supported by socio-economic analysis which is provided with the application.

Disability

2011 Census data identified that 5.3% of the Sudbury's wards residents felt that they had bad or very bad health, similar to the 5.4% rate for Brent. The ward profile for disability is significantly less than London (16.2%) and England (19.2%).

¹ Including those with physical, mental and hidden impairments as well as **carers** who provide unpaid care for a friend or family member who due to illness, disability, or a mental health issue cannot cope without their support



Gender

2011 census data identifies that men made up slightly over half of the population of Sudbury: 7,665 people in Sudbury were men and 7,285 were women.

Gender Reassignment

The Census does not gather data on gender reassignment. Although there has been some work to estimate the number of transgender people in the UK population, estimates vary enormously from 1 in 200 to 1 in 1000 and there is no publicly available statistical data on which to make reliable estimates.

Marriage and Civil Partnership

2011 Census data for Brent identifies the following

	2011	Percentage
All People aged 16 and above	248,458	100.00
Single (never married)	104,685	42.13
Married (first marriage) - 2001 definition		
Re-married - 2001 only		
Married - 2011 definition	107,405	43.23
In a registered same-sex civil partnership - 2011 definition	648	0.26
Separated (but still legally married)	8,501	3.42
Divorced	15,445	6.22
Widowed	11774	4.74

Other- deprivation

LB Brent data identified that in 2014, the median household income in Sudbury is £30,389, lower than the £31,601 value for Brent. Within Brent, Sudbury ranks as the 8th lowest ward in terms of median household income. Median household income varies within the ward by £9,419, from £25,768 to £35,187

Pregnancy/Maternity

NHS data identifies that there in 2017 there were 5,208 live births in Brent – which equates to a ‘crude’ birth rate of 15.8 births per 1,000 population compared with 14.3 across London and 11.6 across England and Wales. This was the 4th highest birth rate in London and the sixth highest in England and Wales.

Race

2011 census data identified the following profile of the Sudbury Ward.

Broad ethnic groups	White	Black	Asian	Mixed	Other ethnicity
	35.7%	17.0%	42.6%	3.2%	1.6%
	22.7%	13.9%	55.6%	3.8%	4.0%
	16	13	5	16	20
	19	11	4	16	19
	▼	▲	▲	—	▲

Religion

GLA data (2018) identifies that Brent in Brent the three largest religious groups are Christian (41%), Muslim (19%) and Hindu (18%). Other smaller, but significant, groups represented in the borough included: Jewish and Buddhist residents (both 1.4%) and Sikh residents (0.5%).

Sexual Orientation

The 2017 GP Patient Survey found that 4.6% of Brent adults surveyed identified as Lesbian, Gay, Bisexual (or ‘Other’). The percentage in Brent was below the London average (5.4%) but well above the England estimate (3.3%).



Step 3: Impact

Q4. Given the evidence listed in step 2, consider and describe what potential short, medium and longer term negative impacts this work could have on people related to their protected characteristics?

Protected Characteristic		Explain the potential negative impact
Age	Y/N	<p>Short Term – Older people may become confused with temporary site logistics including car park closure and how this impact upon their movement patterns around the site to and from the station. Some older people using the station will be unable to park in the car park anymore if they are not blue badge holders. However, the station is still served by the 204-bus route and 24-hour taxi drop off and pick up remains available at the station.</p> <p>Medium Term – When the car park is closed, some older people using the station will be unable to park in the car park anymore if they are not blue badge holders. However, the station is still served by the 204 bus and 24-hour taxi drop off and pick up remains available at the station.</p> <p>Long Term – Older people using the station will be unable to park in the car park anymore unless they are blue badge holders. However, the station is still served by the 204 bus and 24-hour taxi drop off and pick up remains available at the station.</p>
Disability including carers	Y/N	<p>Short Term – The three existing blue badge spaces in the car park will be retained. The developers will aim to keep the blue badge spaces available during construction if possible and ensure safe routes from the spaces to the station. In addition, there are two further blue badge spaces adjacent to the station access from Orchard Gate. Step free access remains available in the station.</p> <p>Medium Term –The three existing blue badge spaces in the car park will be retained. The developers will aim to keep the blue badge spaces available during construction if possible, and ensure safe routes from the spaces to the station. In addition, there are two further blue badge spaces adjacent to the station access from Orchard Gate. Step free access remains available in the station.</p> <p>Long Term – The three existing blue badge spaces in the car park will be retained. In addition, there are two further blue badge spaces adjacent to the station access from Orchard Gate. Step free access remains available in the station.</p>



<p>Gender</p>	<p>Y/N</p>	<p>Short Term – Some people may feel more secure using a personal vehicle, particularly late at night or early in the morning and may be unable to do so when the car park is closed. However, Taxi drop off/pickup is available at the station 24 hours a day and the surrounding controlled parking zones do not operate between 6-30PM and 8AM. There is also cycle parking available at the station.</p> <p>Medium Term – Some people may feel more secure using a personal vehicle, particularly late at night or early in the morning and may be unable to do so when the car park is closed. Taxi drop off/pickup is available at the station 24 hours a day and the surrounding controlled parking zones do not operate between 6-30PM and 8AM. There is also cycling parking available at the station.</p> <p>Long Term - Some people may feel more secure using a personal vehicle, particularly late at night or early in the morning and may not be able to do so when the car park is closed. Taxi drop off/pickup is available at the station 24 hours a day and the surrounding controlled parking zones do not operate between 6-30PM and 8AM. There is also cycle parking available at the station.</p>
<p>Gender reassignment</p>	<p>Y/N</p>	<p>Short Term – Some people may feel more secure using a personal vehicle, particularly late at night or early in the morning and may not be able to do so when. Taxi drop off/pickup is available at the station 24 hours a day and the surrounding controlled parking zones do not operate between 6-30PM and 8AM. There is also cycle parking available at the station.</p> <p>Medium Term – Some people may feel more secure using a personal vehicle, particularly late at night or early in the morning and may not be able to do so when the car park is closed. Taxi drop off/pickup is available at the station 24 hours a day and the surrounding controlled parking zones do not operate between 6-30PM and 8AM. There is also cycle parking available at the station.</p> <p>Long Term - Some persons may feel more secure using a personal vehicle, particularly late at night or early in the morning and may nto be able to do so when the car park is closed. Taxi drop off/pickup is available at the station 24 hours a day and the surrounding controlled parking zones do not operate between 6-30PM and 8AM. There is also cycle parking available at the station.</p>
<p>Marriage/civil partnership</p>	<p>Y/N</p>	<p>Short Term – No impacts are anticipated</p> <p>Medium Term – No impacts are anticipated</p> <p>Long Term – No impacts are anticipated.</p>



<p>Other – e.g. refugees, low income, homeless people</p>	<p>Y/N</p>	<p>Short Term – None ,but these will be monitored during the development process.</p> <p>Medium Term – None, but these will be monitored during the development process</p> <p>Long Term - None, but these will be monitored during the development process</p>
<p>Pregnancy/maternity</p>	<p>Y/N</p>	<p>Short Term – Anecdotal evidence from public consultation suggests that parents with buggies and pregnant women use the station due to its step free access. When the car park is removed it may make the station more difficult to access for pregnant women and younger families arriving by car. However, Taxi drop off/pickup is available at the station 24 hours a day and the station will still be served by the 204 bus.</p> <p>Medium Term – Anecdotal evidence from public consultation suggests that parents with buggies and pregnant women use the station due to its step free access. When the car park is removed it may make the station more difficult to access for pregnant women and younger families. However, Taxi drop off/pickup is available at the station 24 hours a day and the station will still be served by the 204 bus.</p> <p>Long Term - Anecdotal evidence from public consultation suggests that parents with buggies and pregnant women use the station due to its step free access. When the car park is removed it may make the station more difficult to access for pregnant women and younger families. However, Taxi drop off/pickup is available at the station 24 hours a day and the station will still be served by the 204 bus.</p>
<p>Race</p>	<p>Y/N</p>	<p>Short Term – None, but these will be monitored during the development process</p> <p>Medium Term – None, but these will be monitored during the development process</p> <p>Long Term - None, but these will be monitored during the development process</p>
<p>Religion or belief</p>	<p>Y/N</p>	<p>Short Term – Sudbury Town Baptist church is within 100m of the site. The church have objected that to the closure of the station car park through the planning application process. However, main church services take place on a Sunday and on street Controlled Parking Zones do not apply on this day enabling church goers to park on streets around the church. There are also a range of other car parks available in Sudbury (please see section 1 for more details).</p> <p>Medium Term –. Sudbury Town Baptist church is within 100m of the site. The church have objected that to the closure of the station car park through the planning application process. However, main church services take place on a Sunday and on street Controlled</p>



		<p>Parking Zones do not apply on this day. There are also a range of other car parks available in Sudbury (please see section 1 for more details).</p> <p>Long Term - Sudbury Town Baptist church is within 100m of the site. The church have objected that to the closure of the station car park through the planning application process. However, main church services take place on a Sunday and on street Controlled Parking Zones do not apply on this day. There are also a range of other car parks available in Sudbury (please see section 1 for more details).</p>
Sexual orientation	Y/N	<p>Short Term – Some people may feel more secure using a personal vehicle, particularly late at night or early in the morning. Taxi drop off/pickup is available at the station 24 hours a day and the surrounding controlled parking zones do not operate between 6-30PM and 8AM. There is also cycle parking available at the station.</p> <p>Medium Term – Some people may feel more secure using a personal vehicle, particularly late at night or early in the morning. Taxi drop off/pickup is available at the station 24 hours a day and the surrounding controlled parking zones do not operate between 6-30PM and 8AM. There is also cycle parking available at the station.</p> <p>Long Term - Some people may feel more secure using a personal vehicle, particularly late at night or early in the morning. Taxi drop off/pickup is available at the station 24 hours a day and the surrounding controlled parking zones do not operate between 6-30PM and 8AM. There is also cycle parking available at the station.</p>

Q5. Given the evidence listed in step 2, consider and describe what potential positive impacts this work could have on people related to their protected characteristics?

Protected Characteristic		Explain the potential positive impact
Age	Y	<p>A safer and more secure environment for all ages with passive surveillance and new lighting from development</p> <p>Affordable homes targeted at those on low income especially younger people living and working in the borough who cannot access market housing.</p>
Disability including carers	Y	<p>Wheel chair adaptable affordable homes will be provided as part of the development and will meet local demand for these types of homes.</p> <p>Better security of blue badge spaces in car park through passive surveillance and lighting from the development.</p>



Gender	Y	Better security through passive surveillance and new lighting from development
Gender reassignment	Y/N	Better security through passive surveillance and new lighting from development
Marriage/civil partnership	Y/N	None specific to this characteristic.
Other – e.g. refugees, low income, homeless people	Y/N	Affordable homes targeted at those on low incomes and especially younger people living and working in the borough who cannot access market housing.
Pregnancy/maternity	Y/N	Step Free access remains at the station.



Race	Y/N	None specific to this characteristic.
Religion or belief	Y/N	. None specific to this characteristic.
Sexual orientation	Y/N	Better security through passive surveillance and new lighting from development

Step 4: Consultation

Q6. How has consultation with those who share a protected characteristic informed your work?

List the groups you intend to consult with or have consulted and reference any previous relevant consultation?²	If consultation has taken place what issues were raised in relation to one or more of the protected characteristics?
A public exhibition to outline details of the emerging proposals was held on 21 November 2018 from 4.15pm to 8pm at Barham Park Library, Harrow Road, close to the application	Appendix 3 sets out the statement of community involvement submitted with the planning application.

² This could include our staff networks, the Independent Disability Advisory Group, the Valuing People Group, local minority groups etc



<p>site.</p> <p>Invitations to attend the exhibition were sent to over 1,000 addresses within a 400m walking distance of the site, as well as to local Councillors, organisations and interest groups including the Sudbury Town Neighbourhood Forum.</p> <p>Over 115 flyers were also given out at Sudbury Town station on the day of the exhibition to inform users of the station and car park of the opportunity to consider the proposals</p> <p>Further to the public exhibition, the applicant attended a meeting of the Sudbury Town Residents Association on 12 February 2019 to present details of the development and to discuss the proposals and similar concerns were raised to those expressed at the development presentation. Two newsletters were also sent out the Local community in February 2019 and October 2019.</p> <p>LB Brent has also carried out consultation on the development as part of the statutory process for assessing planning applications. This enabled the local community to comment on proposals and identify if they object to or support the development</p>	<p>The key issue raised in relation to protected characteristic groups was the removal of the car park.</p> <p>A number of individuals engaged in this process to support and object to the development. The key issue raised in consultation responses was the closure of the car park. However, many individuals supported the development of new affordable homes.</p>
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Q7. Where relevant, record any consultation you have had with other projects / teams who you are working with to deliver this piece of work. This is really important where the mitigations for any potential negative impacts rely on the delivery of work by other teams.

<p>London Underground We are in regular communication with LU colleagues and station staff and have formal lines of communication with Infrastructure Protection (IP) in order to mitigate the impact of the development during and post construction.</p> <p>LB Brent Pivotal to the design of the development has been ours/Pockets discussions with LB Brent. They have ensured that we have provided a scheme which meets planning policy requirements within the borough and the design has evolved throughout the planning application process to ensure that there are no negative impacts on the amenity of surrounding properties.</p>



Step 5: Informed Decision-Making

Q8. In light of the assessment now made, what do you propose to do next?

Please select one of the options below and provide a rationale (for most EqIAs this will be box 1). Please remember to review this as and when the piece of work changes

<p>1. Change the work to mitigate against potential negative impacts found</p>	<p>The design has retained the three blue badge car parking within the station car park to ensure that car parking is still available for disabled users so they can use the step free access at the station.</p> <p>A Construction management plan will be produced prior to start on site. We/Pocket will ensure continuous consultation with stakeholders.</p>
<p>2. Continue the work as is because no potential negative impacts found</p>	
<p>3. Justify and continue the work despite negative impacts (please provide justification)</p>	
<p>4. Stop the work because discrimination is unjustifiable and no obvious ways to mitigate</p>	



<p>Maternity/Pregnancy.</p> <p>1) Anecdotal evidence from public consultation suggests that parents with buggies and pregnant women use the station due to its step free access. When the car park is removed it may make the station more difficult to access for pregnant women and younger families.</p> <p>Mitigation: TfL station staff will help pregnant women and families with young children use step free access at the station.</p>	<p>Post construction</p>	<p>TfL</p>
<p>Religion</p> <p>Sudbury town Baptist church has objected to the development on the basis that the car park is sometimes used by church goers for 'occasions like funerals'</p> <p>Mitigation: While TfL accepts that churchgoers may use the car park for occasions, there are other available car parks within Sudbury that can be used by church goers including the 16 space car park in Barham Park and the 95 space car park adjacent to Wembley football club.</p>		



Step 7: Sign off

Signed Off By	EQIA Author	Name Luke Burroughs Job Title
	Signature	Date
	EQIA Superuser	Name: Peter Goulding Job Title: Lead Operational Development Manager
	Signature 	Date: 10/12/19
	Senior accountable person	Name David Wakeford Job Title



	Signature	Date
	Diversity & Inclusion Team Representative	Name Job Title
	Signature	Date



Appendix 1

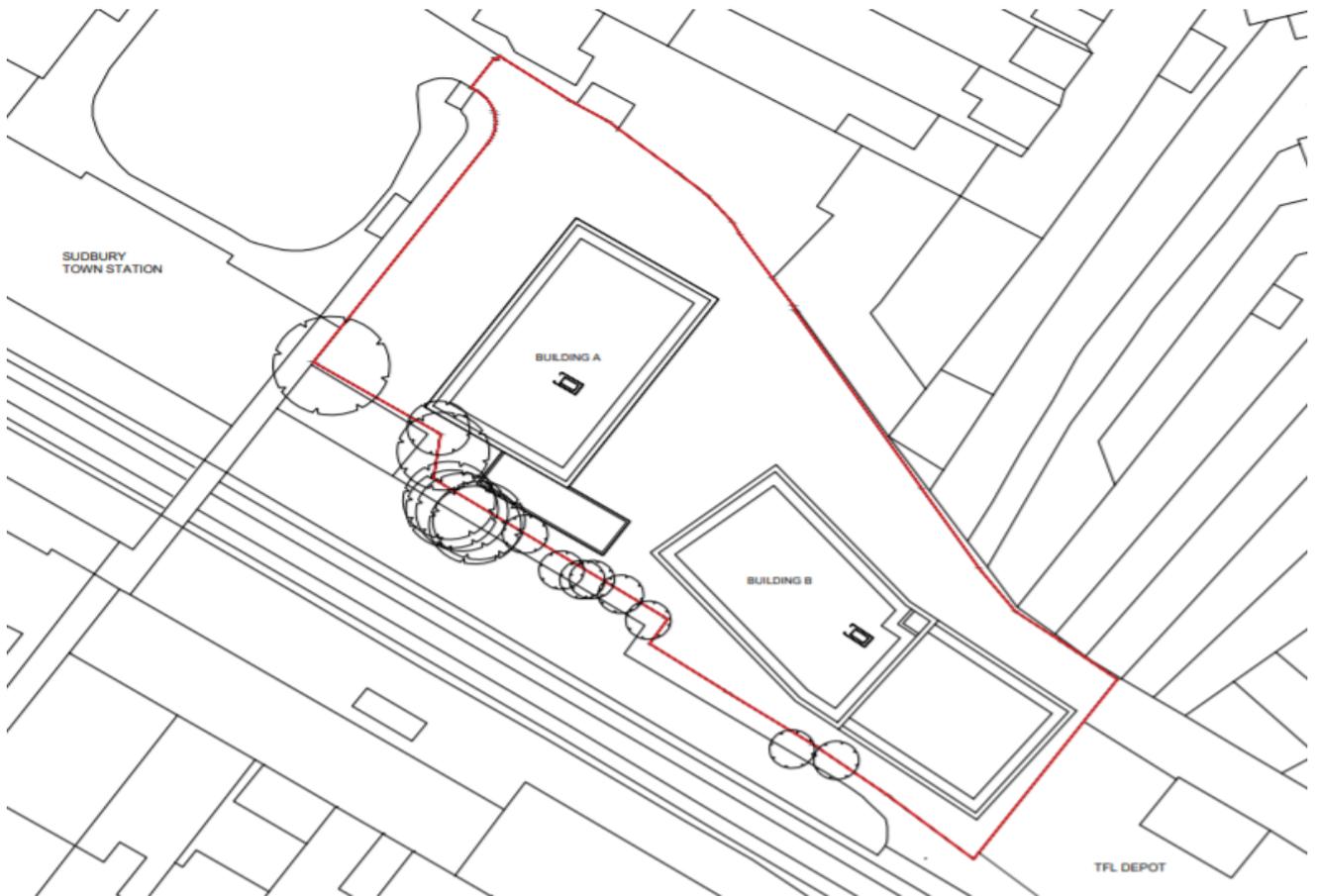
Site Plan



Appendix 2: Proposed Block Plan

Printed copies of this document are uncontrolled.
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Appendix 3: Planning Statement/Statement of Community Involvement



Appendix 4: Sudbury Town Transport Assessment

