Brent

Scrutiny Committee

Wednesday 12 August 2015 at 7.00 pm
Boardroom 3/4 - Brent Civic Centre, Engineers Way, Wembley HA9 0FJ

Membership:

Members Councillors:	Substitute Members Councillors:
Filson (Chair) Colwill (Vice-Chair) Daly Farah Kelcher Miller Stopp Tatler	Agha, Hector, Khan, J Mitchell Murray, Nerva, Ketan Sheth and Thomas

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The press and public are welcome to attend this meeting

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for Brent

Agenda

Introductions, if appropriate.

Apologies for absence and clarification of alternate members.

Item   **Page**

1   Declarations of interests

Members are invited to declare at this stage of the meeting, any relevant financial or other interest in the items on this agenda.

2   Deputations (if any)

3   Minutes of the previous meeting

Minutes of the meeting held on 14 July are to follow.

4   Matters arising (if any)

5   Council's future Transport Strategy   1 - 66

The Long Term Transport Strategy (LTTS) has been developed to provide strategic direction to transport investment throughout the borough over the next 20 years (2015 - 2035). It is being submitted to Scrutiny Committee before it is considered by the Cabinet on 24 August 2015.

6   Food Standards Audit   67 - 84

This report sets out the background to the July 2014 Food Standards Authority audit of the Council's discharge of its Food Safety Act 1990 duties, the report findings, the council's response and progress since.

7   Any other urgent business

Notice of items to be raised under this heading must be given in writing to the Democratic Services Manager or his representative before the meeting in accordance with Standing Order 64.

Date of the next meeting: **Wednesday 9 September 2015**

- Please remember to *SWITCH OFF* your mobile phone during the meeting.
- The meeting room is accessible by lift and seats will be provided for members of the public.

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	Scrutiny Committee 12 August 2015
	Report from the Chief Operating Officer
For Action	Wards Affected: ALL
Long Term Transport Strategy	

Forward Plan Ref:

1.   SUMMARY

1.1.   The Long Term Transport Strategy (LTTS) has been developed to provide strategic direction to transport investment throughout the borough over the next 20 years (2015 - 2035).

1.2.   Priorities and objectives have been developed following consultation with residents and key stakeholders regarding transport and travel in the borough which also reflect the priorities and objectives set out in the Borough Plan and the Mayors Transport Strategy.

1.3.   The priorities and objectives of the LTTS when implemented will also complement and support work of other service areas such as Regeneration and Growth and Air Quality.

1.4.   The report is to be submitted to Cabinet on 24 August 2015 but is being put to Scrutiny Committee first to allow its comments to be incorporated.

2.   RECOMMENDATIONS

2.1.   That Cabinet notes the consultation, and

2.2.   That Cabinet provides approval to the Long Term Transport Strategy for Brent 2015 – 2035 as set out in Appendix A.

2.3.   Pending content approval Cabinet agrees that the designed version be approved by Cabinet Members subsequent to this meeting without having to return to a further Cabinet.

3. BACKGROUND

3.1. A draft LTTS, was taken to the Highways Committee in March 2014. The Committee agreed the following:

   (i)   that the draft Long Term Transport Strategy for Brent be approved, subject to inclusion of changes agreed by the then Executive;

   (ii) that the draft Long Term Transport Strategy be subject to public and stakeholder consultation during 2014, and be reported back to the Highways Committee and Executive for final approval.

4. PURPOSE OF THE LTTS

4.1. The LTTS has been developed to provide a strategic direction for investment in transport throughout the borough over the period of 2015 to 2035. It will be used to inform the development of other transport strategies for the borough and will provide a basis for future Local Implementation Plan (LIP) annual spending submissions to Transport for London.

4.2. It will primarily be implemented via the action plans of daughter strategy documents, such as the Cycling Strategy etc. and the LIP annual spending submission.

4.3. It also will enable us to demonstrate clearly what progress is being made towards achieving the objectives as it contains targets, measuring the success of the strategy. Performance against these targets will be monitored and reported annually.

5. PUBLIC CONSULTATION

5.1. The draft LTTS went out for public consultation from 21st August 2014 to 16th October 2014. Local elected Members and stakeholder groups were consulted separately.

5.2. The consultation process included the following:

   • A Member workshop including a presentation and opportunity to comment on each section of the draft LTTS.

   • An online questionnaire via the consultation portal.

   • Stakeholder organisations, including statutory stakeholders, partner organisations, community and interest groups received a letter with information on how to access the full consultation document with a link to the questionnaire and an offer to meet.

   • Members of the public received notification of the consultation via the Brent Magazine, Facebook, Twitter and the Brent Borough Council website.

- Questionnaires placed in libraries throughout the borough and a link to the e-questionnaire was widely advertised via the above media and a press release.

- Three staffed events held on the 25th September from 17:00 to 20:00, the 26th September from 10:00 to 16:00 and Saturday 4th October from 11:00 to 16:00. By holding these events at two different times of day, during the week and at the weekend we sought to maximise the amount of people able to attend. The events were advertised via the same media as the questionnaire.

5.3. A good level of response was received and all comments submitted during the consultation process were assessed for incorporation into the final LTTS.

5.4. The numerical survey results can be seen in Appendix C.

6. CONSULTATION ANALYSIS

6.1. On viewing the comments it is evident that the consultation highlighted a number concerns regarding the draft LTTS, some of which were raised by a number of individual groups or members of the public. Concerns of particular note included:

- Poor structure
- Lack of emphasis on health and wellbeing
- Non-specific targets and objectives
- Lack of emphasis on air quality
- Lack of emphasis on walking
- Lack of emphasis on cycling
- The need for improved bus services

6.2. The free text comments received from stakeholders, members and members of the public are set out in full in Appendix B.

6.3. The identified concerns suggested that further work was required in order to ensure the LTTS was fully reflective of the needs of the borough.

7. FURTHER WORK

7.1. Due to the nature of the comments received it was not felt that minor alterations of the draft LTTS was sufficient to fully reflect the outcome of the consultation.

7.2. As such, following input from senior officers and the portfolio holder the draft LTTS was revised significantly to better reflect the needs of the borough as suggested by residents, stakeholders and Members.

7.3. This has resulted in a number of changes which includes a consolidation of the number of objectives that now reflect the current priorities and objectives of the council and the Mayor's Transport Strategy.

7.4. The structure of the document has been revised to present the priorities and objectives earlier in the document outlining from the outset of what we are aiming to achieve for transport and travel in Brent. Emphasis is now placed on each objective enabling the reader to immediately understand how they are going to be achieved with the relevant target indicating when we will aim to achieve it.

7.5. The revised structure has enabled the length of the document to be halved whilst not losing strategic focus. This has enabled comments regarding the long length and repetitiveness of the draft LTTS to be answered

7.6. Appendix B sets out all comments received, highlighting where comments have been incorporated into the final LTTS (Appendix A) and provides a comparison point (where available) to the consultation document. It also provides an explanation where we have been unable to take comments forward.

7.7. Appendix A was also scrutinised at the Scrutiny Committee on 12 August 2015 and …...

8. CONCLUSION

8.1. Following the revisions as a result of the consultation and scrutiny it is considered that the final LTTS, as shown in Appendix A, is now a focussed strategic document that is accessible and fully reflects the consultation results, the Borough Plan and the Mayors Transport Strategy. It is recommended that it be adopted as policy by Cabinet.

9. FINANCIAL IMPLICATIONS

9.1. There are no direct financial implications arising as a result of the adoption of the LTTS as it seeks to embody strategies and policies that Brent Borough Council is already committed to. However, it may provide a good basis for bidding for further funding in the future.

9.2. Any costs linked to implementing the strategy would be met from existing resources or would be subject to a further report to Cabinet before proceeding.

10. LEGAL IMPLICATIONS

10.1. There are no known legal implications associated with adoption of the LTTS.

11. DIVERSITY IMPLICATIONS

11.1. The consultation material was made available to all groups on an equal basis. Stakeholders included faith groups, disability groups and ethnic minority community groups. The majority of responses received were from those identifying as white and Christian, however, a significant proportion were received from those identifying as black.

11.2. There are no known diversity implications associated with the LTTS. This report is accompanied by an Equality Impact Assessment, see Appendix D.

12. STAFFING / ACCOMMODATION IMPLICATIONS (IF APPROPRIATE)

12.1. There are no requirements for increased staffing levels or alteration of accommodation.

13. BACKGROUND PAPERS

13.1. None

14. CONTACT OFFICERS

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Contents

1. Introduction

The purpose of the Long Term Transport Strategy

1.1. The Long Term Transport Strategy (LTTS) has been developed to provide a strategic direction for investment in transport throughout the borough over the period of 2015 to 2035.

1.2. This will enable Brent Borough Council to make further improvements to the transport networks that will enhance mobility and accessibility for all.

1.3. The LTTS will be used to inform the development of other transport strategies for the borough and will provide a basis for future Local Implementation Plan (LIP) annual spending submissions. This is the main mechanism via which funding from Transport for London is granted for schemes and initiatives to improve transport infrastructure and travel behaviour. It is therefore important the submission accurately reflects the long term needs of the borough.

Policy context of the LTTS

1.4. The LTTS has been developed to reflect both the objectives set out in the Borough Plan and the Mayor's Transport Strategy (MTS) and the needs of the borough as highlighted by public consultation and stakeholder engagement.

1.5. The Borough Plan has been developed by Brent Borough Council following extensive consultation with Brent residents and businesses and provides objectives focussed on making Brent a better place to live, work and visit.

1.6. The MTS provides a long term strategic view of transport for London in the wider context and therefore must be considered when developing policy on a borough level. However, it is acknowledged that the priorities reflected within the MTS may change following the development of a new strategy over the coming years. Any changes that materially affect the LTTS will be incorporated following the first review of the LTTS five years after adoption.

1.7. The LTTS is also supported by and reflected within a variety of other borough strategies, including:

- The Cycling Strategy

- The Walking Strategy

- The Freight Strategy

- Brent Place Making Guide

- Parking Policy

- Strategic Infrastructure Plan

- Speed Limit Strategy

- Travel Planning Strategy

- Air Quality Strategy

- Promotion of Independent Travel for Adult Social Care Service Users

1.8.   The LTTS will be supported by future LIP annual spending submissions and will provide a policy basis for transport input to proposed development within the borough.

Development of the LTTS

1.9.   The LTTS has been developed following public consultation from August to October 2014. This consultation resulted in a high level of feedback from both members of the public and stakeholders and this has been utilised to inform all areas of the LTTS.

1.10.   Responses to this consultation were monitored to ensure the diverse nature of Brent was fully represented within the results.

1.11.   The LTTS has been further developed with input from partner organisations and key stakeholder groups to ensure it is fully reflective of all the needs of the borough over the next 20 years.

1.12.   This LTTS will be reviewed on a regular basis to ensure it stays current to the needs of the borough. The first full review will take place in 2020, and every five years following that. Though given the long life span of the LTTS five yearly reviews appear appropriate it is possible that under some circumstances reviews prior to these dates will be required.

Monitoring and Implementation

1.13.   The LTTS contains targets aimed at helping the borough measure the success of the strategy in achieving its objectives. These targets are SMART, meaning they are

- Specific

- Measurable

- Achievable

- Realistic

- Time-related

1.14. These targets will be subject to a full monitoring regime. Some targets will be shared with other strategies and therefore will accumulate economies of scale on monitoring activities.

1.15. It is envisaged that monitoring data will be collated annually to give an indication of how much progress has been made towards achieving the objectives. This will then be used to inform the five year reviews.

1.16. Due to the long-term nature of the LTTS and its primary purpose as a guidance document for future policy formulation and funding allocation, it does not contain a detailed action plan of measures to be implemented independently. It is not the purpose of this document to provide details of specific schemes. This detail will be contained in the annual LIP submission and other strategies that will be formulated to reflect the objectives of the LTTS and other relevant borough and regional policies.

1.17. Therefore the main implementation mechanism associated with the LTTS will be incorporation of its objectives into policy development and scheme design, in particular as part of the yearly LIP submissions and the action plans of other strategies.

1.18. The LTTS will also feed into and influence the Strategic Infrastructure Plan and the Highways Asset Management Plan with regard to where and how future Community Infrastructure Levy and section 106 funds may be allocated.

1.19. It is expected that future transport strategy and policy development throughout the borough will make reference to this document and contribute to achieving the objectives it contains. It is also expected that future transport policy development will be formulated with reference to relevant policies from other service areas within Brent Borough Council. This will ensure through partnership working that future policies reflect the needs of all residents, visitors and businesses within the borough.

1.20. As part of the development of further transport strategies stemming from this LTTS inclusivity and accessibility for all members of the community will be taken forward at every opportunity.

1.21. When designing future schemes current best practice regarding shared space and public realm design will be used to capture the potential for these schemes to be inclusive of all members of the community. This will also be taken forward in future iterations of the Brent Placemaking Guide

2. Priorities and Objectives

2.1. The following priorities and objectives have been formulated following analysis of the results of the public and stakeholder consultation which took place from August to October 2014. They also take into account the objectives of the Mayors Transport Strategy, the Borough Plan, the Regeneration Strategy and the need to improve air quality and the health of Brent residents.

Priorities

2.2. The results of the consultation suggest that there are certain key areas that are of concern to Brent residents. These include accessibility within the borough, air quality and road safety. These have been taken forward and added to established regional and local policy priorities in order to formulate five priority areas that will provide a focus for further work. These are:

- Road safety

- Air Quality

- Health

- Congestion

- Growth and regeneration

2.3. The consultation results highlight the support for improved air quality, with 89% of respondents agreeing with a policy statement to "Improve air quality where possible." Free-text comments also supported this, with samples being:

"An absolute commitment to improve air quality is needed"

"A low emission strategy is essential"

2.4. Air quality and its impacts on health is also a key concern regionally and nationally with increasing policy emphasis placed on the introduction of low-emission measures that reduce the production of NO2 and PM.

2.5. A priority of reducing congestion has been formulated as a mechanism for capturing the responses to a number of questions and free-text responses that all require reduced car use and more sustainable travel to be achieved. These include:

- 84% support for promoting walking and cycling

- 81% support improving Brent's town centres

- 92% support for making local streets more attractive

- 89% support for improving air quality

2.6.   Responses to the consultation identified health as an important issue going forward in terms of quality of life for residents. This is now reflected in the LIP prioritisation matrix and will be taken forward in the development of other transport strategy documents. We will work with health providers and other service areas within the council to achieve delivery of improved public health outcomes including mental well being for residents of Brent.

2.7.   High levels of congestion reduce the quality of life of Brent residents and have a negative effect on economic growth. They also suppress the uptake of active travel modes by degrading the environment for cyclists and pedestrians. Therefore, given the large number of policy areas influenced by congestion and the potentially significant benefits gained by reducing it, congestion has been included as a priority within the LTTS.

2.8.   As the level of growth expected within Brent over the next 20 years is significant, both in terms of population and jobs, it is important that the LTTS fully incorporates the need to provide for this. Failure to provide adequate focus on growth areas and the need for increased transport facilities, both conventional and innovative, to cater for increases in demand will result in a reduction in quality of life for Brent residents. The emphasis on growth reflected in the Borough Plan, the Regeneration Strategy and more widely the proposed Mayors Infrastructure Plan and Mayors Transport Strategy mean that growth must be considered a priority within the LTTS.

2.9.   The need to reduce accidents on Brent's roads was supported by 92% of respondents to the questionnaire, suggesting it is an important issue for local residents. Road safety, accident reduction and perceived personal safety is also a key priority in the Borough Plan and the Mayors Transport Strategy and has been a focus for LIP submissions for several years with particular focus given to vulnerable road users. Due to these factors, it is included as a priority within the LTTS.

Objectives

2.10.   These objectives have been formulated to reflect the Priorities in a measurable context. They will provide the focus for the LTTS and will inform the targets set out later in this document. This will enable the borough to measure progress against the objectives and therefore progress against the key policy areas reflected in the priorities.

2.11. As this document forms the basis of future LIP submissions by providing an over-arching strategy containing long-term goals, they will also by default provide objectives for future LIP formulation. This is reflected in the fact that the LIP submission is considered to be the iterative and live action plan for implementation of the LTTS.

2.12. The objectives of this strategy will also be incorporated into other transport strategies developed by Brent. These include the documents outlined in paragraph 1.6.

Objective 1: Increase the uptake of sustainable modes, in particular active modes.

2.13. Increasing the uptake of cycling and walking will actively contribute to a reduction in congestion and air pollution and improve the health of Brent residents. Use of public transport or car clubs instead of the private car also contributes to reduced congestion and is important in enabling access to services. Uptake of all these modes can be influenced by effective travel planning measures and infrastructure.

Objective 2: Reduce conventional vehicular trips on the network, particularly at peak time

2.14. This is not about reducing the total number of trips on the network as mobility is highly important for local economic growth and for those residents who struggle to travel by other means, and require motorised travel to facilitate independent travel. However, trips can be re-timed to avoid peak hours or take place in less polluting vehicles.

Objective 3: Support growth areas and town centres to enable acceptable development

2.15. Brent is expected to see high levels of growth over the next 20 to 30 years, focussing on the growth areas. Adequate transport investment will be required to ensure this development takes place on a sustainable basis, is accessible for all users and does not place undue pressure on the transport networks.

Objective 4: Reduce KSI incidents and slight accidents on Brent's roads

2.16. Over the last 10 years roads in Brent have become safer, however there is still considerable amounts of work to do in further reducing accidents to create safe and accessible streets for all users.

Objective 5: Reduce the exposure of Brent residents to particulate matter (PM) and nitrogen dioxide (NO_2) generated by the transport network

2.17. It has become apparent that particulate matter and nitrogen dioxide generated by a variety of sources has a significant adverse impact on the health of those who are regularly exposed. A proportion of these

pollutants are generated by transport. Reduction in exposure of Brent residents could result in significant health benefits.

3. Increase use of Sustainable modes, in particular active modes

3.1. Brent is expecting high levels of growth over the next 20 years, with another 66,000 people expected to move in and another 21,500 houses to be built. This growth will put more pressure on the road network, so if it is to be accommodated without affecting the quality of life of Brent residents, more journeys must take place by sustainable modes. These include walking, cycling and public transport. They can also be considered to include use of car clubs and, in particular, car clubs that make use of low emission or ultra-low emission vehicles.

3.2. It is also acknowledged within the Borough Plan and by Public Health that use of sustainable travel modes can have a hugely beneficial impact on health. Cycling and walking have been shown to contribute to increased 'Years of Healthy Life' as the exercise gained improves fitness and reduces the risk of heart disease and other common causes of death and illness.

3.3. Walking and cycling are also low cost and easily accessible for many people, making them particularly important for young people and people on low incomes who may find it difficult to access a car.

3.4. Modal shift from use of private cars towards sustainable modes also contributes to reduced congestion and therefore the ability to provide a higher quality environment on local streets enabling greater mobility through improved accessibility and increased perceived personal safety for all. Fewer cars result in reduced emissions of particulate matter and NO_2 contributing to better air quality and better health.

3.5. The LTTS therefore seeks to provide a framework by which the use of sustainable modes can be promoted and increased.

Cycling

3.6. Cycling within London has grown considerably over recent years and provision for cyclists has become more important. Cycling has been prioritised within the MTS as a zero-emission, congestion reducing mode that has benefits for both society and the individual.

3.7. Cycling is considered particularly beneficial in terms of health and wellbeing, with those who cycle regularly reporting less stress, less ill-health and improved cardio-vascular fitness levels. Regular cyclists are half as likely as the average person to suffer from heart disease, 27% less likely to have a stroke, and will live, on average, more than two years longer.

3.8. Cycling is a relatively cheap mode of travel once a bike has been obtained, making it accessible to a large section of the population. In particular, for those without access to a car cycling can expand the distance which an individual is able to travel and hence increase the number of services, jobs and other destinations that they can access.

3.9. This can be very important for young people who may have limited access to other modes of transport and therefore may struggle to access education or work opportunities. To help young people take up cycling and remain safe on the roads, Brent Borough Council continues to offer free cycle training.

3.10. There are now a wide variety of cycles on the market designed to cater for the needs of a diverse population. These include hand-cycles, trikes, cycles adapted for carrying large loads and electric bikes designed to provide motorised assistance for those who need it. This increasing variety is enabling an ever greater number of people to access cycling even when a conventional cycle is unsuitable for their needs.

Cycle Strategy

3.11. As part of the development process a data gathering exercise was carried out to assess who cycles in Brent, for what purpose and what they consider to be most important in improving the situation for cyclists in the area and encouraging uptake. The headline results of this survey are:

- The most significant barrier to cycling was considered to be road safety (94% of respondents) and the cycling environment (86% of respondents).

- 69% of respondents believed that the development of a network of quiet, on-road routes avoiding major links would be the best way to encourage cycling and reduce concerns over road safety.

3.12. It has also become apparent that uptake of cycling in the north of the borough lags behind that of the south. In the south of the borough cycling claims 2-5% modal share of journeys, where as in the north this fall to 0-1%.

3.13. The action plan contained within the Cycle Strategy will be considered to be the main method of achieving an increase in the up-take of cycling within Brent over a five year period and addressing the points raised within the survey. Following this five years review of this strategy will result in new targets being set and a new action plan being produced.

3.14.   Given the important accessibility and inclusivity implications of cycling, one of the key aims of the Cycle Strategy will be to identify and remove barriers to cycling in the borough for all groups.

Targets

3.15.   These targets are shared with the Cycling Strategy to ensure consistency.

3.16.   The targets are set for 2021, the end of the lifespan of the first Cycle Strategy. It is expected that at this time either these targets will have been achieved and new targets will be set in line with the relevant Cycle Strategy or an assessment will be made as to why they have not been met and what needs to be done to achieve them. Base years will vary according to the data available.

- Increase mode share to 3% in 2020/2021 from 1% in 2013

- Increase the number of cycle parking spaces by 1000 by 2021

- Increase number of adults accessing cycle training by 50 adults per year up to 2021

- In crease the number if children accessing cycle training by 50 children per year up to 2021

- Increase the number of cyclists from currently underrepresented groups by 200 by 2021 as indicated by the London Travel Demand Survey

3.17.   It is expected that the main method employed in achieving these targets will be the successful implementation of the Cycle Strategy and following Cycle Strategies.

3.18.   However, encouraging use of sustainable transport and improving air quality are also criteria used to prioritise schemes submitted as part of the LIP. Therefore, the LIP submission is also expected to contribute to achieving these goals.

3.19.   Adequate maintenance of facilities for cyclists is an important element in encouraging cycling and keeping people cycling rather than reverting to car use. It is therefore important that the Highway Asset Management Plan adequately reflects the maintenance needs of cycle infrastructure.

Walking

3.20.   It has been identified that walking as a mode needs more emphasis placed upon it than has been the case previously. This was particularly important for groups such as Living Streets and WestTrans who commented that the benefits of walking are similar to those of cycling and

that most journeys begin and end on foot. Therefore, the LTTS seeks to afford walking and pedestrians a higher level of priority and to fully support further uptake of this mode.

3.21.　It is increasingly understood that while walking has similar health benefits to cycling it also has different characteristics which make it suitable for different user groups. Unlike cycling it does not require equipment to be purchased and is readily available to the majority of the population. This makes is a very accessible mode for both the younger population and the older population.

3.22.　For groups who struggle to access other modes it can have the benefit of providing a greater level of independence, improving mental health and well-being through enhanced mobility. It can also provide a way into physical activity for those who are older and may not be confident enough to take up cycling in their later years.

3.23.　Increasing the number of trips carried out by foot also reduces car travel and therefore contributes to better air quality as well as lower levels of congestion and improved road safety.

Walking Strategy

3.24.　It is expected that a full Walking Strategy will be produced and it will seek to implement the objectives of this strategy within its action plan. Through the Walking Strategy the LTTS will aim to increase walking through developing, promoting and maintaining safe, secure, convenient, efficient and attractive infrastructure for all.

Place making

3.25.　There are a number of factors that are important in encouraging or discouraging walking, however the quality of the environment is vital in persuading individuals that the streets are both safe and accessible and that therefore walking to their destination is not just practical but also pleasant.

3.26.　Place making plays an important role in this and will be instrumental in increasing the uptake of walking going forward. This should be reflected in scheme design, particularly for major schemes.

3.27.　In opportunity areas which are due to see high levels of growth or re-development it is important that place making is incorporated into the development. This will enhance the sustainability of the development and encourage greater uptake of walking. The extant Place Making Guide, or approved area specific design guides should be taken into account when designing the infrastructure for these areas.

3.28.   Place making and a high quality urban realm are also important in encouraging use of the streets by more people. This in itself makes the streets feel safer due to the greater level of surveillance by other members of the public. This is important in enhancing community safety and designing out crime where possible.

Walking targets

3.29.   There are two targets associated with monitoring progress against this area of the strategy. These are as follow:

- The Travel Demand Survey projects an increase in walking from 29% in 2013 to 32% in 2030. However, it is hoped that the increased investment made in walking facilities through the Walking Strategy will enable a greater increase to take place in Brent. Therefore the target set within this strategy will be to increase the mode share of walking by 5% for 2030.

- A 10% increase in the number of schools in Brent which have gold standard travel plans by 2030. These are designed to reduce the number of trips made to the school by car and encourage the uptake of walking.

3.30.   The main method of achieving these targets will be the implementation of the Walking Strategy over the next five to ten years. Measures included within this strategy are expected to be aimed at improving access to walking for all members of society and thereby enabling an increase in the walking mode share.

3.31.   However, it is also important that the need to accommodate pedestrians is taken into account in LIP submissions and in particular major schemes, which have the potential to vastly improve local environments. This is reflected within the prioritisation matrix for the LIP.

3.32.   It is also important that footways, signage and other facilities are maintained to an acceptable standard in order to provide an environment which is fit for purpose and safe to use. The Highways Asset Management Plan will be instrumental in ensuring that this is taken forward and that facilities remain in usable condition once installed.

3.33.   Brent currently has a Place Making Guide which takes account of the need to make places inviting for pedestrians to spend time in and feel safe. This guide and future iterations thereof should continue to be taken into account in scheme design and location.

Public Transport

3.34. While Brent Council does not directly fund, manage or control any public transport services, the Borough maintains a role in lobbying Transport for London (TfL) for service improvements as and where they are required. Brent seeks to work closely with TfL in developing schemes and strategies in order to ensure public transport is well catered for within the Borough and will continue to do so.

3.35. Public transport plays an important role in providing an alternative to car use and, though bus and train use are not considered active modes, they contribute to reduced congestion and lower emissions by reducing the number of car trips taking place.

3.36. Bus services in particular are also important in enabling access to services, employment and education for those who do not have access to a car. They therefore perform a vital function in reducing social exclusion and enhancing social cohesion.

3.37. Through the Bus Accessibility Programme 94% of bus stops are now accessible for people with mobility impairments, facilitating independent travel. This Programme provides improvements that allow buses to pull up to the kerb allowing a disability ramp to be extended. This has improved access to transport for groups who may otherwise struggle to move around the borough.

3.38. To further improve access to and the user experience of public transport, Brent has introduced the bus guardian scheme. This scheme places "guardians" on some bus services to protect passengers from the anti social behaviour which may be generated by some passenger groups. This has helped reduce concerns over safety on public transport.

3.39. Brent is well served by a variety of public transport networks, including:

- Four London Underground lines (Bakerloo, Jubilee, Metropolitan and Piccadilly lines)
- London Overground services on the North London line and Euston-Watford Junction line
- Chiltern Railways services from High Wycombe to London Marylebone
- Southern Railway services from East Croydon to Milton Keynes Central
- London Bus services throughout the borough

3.40. Key strengths include the Metropolitan line, which provides a fast and efficient link into Central London and is currently under capacity. The London Overground has seen considerable patronage growth since control was assumed by TfL in 2007. This has resulted in substantial investment in new trains, platform extensions and station upgrades to meet demand.

3.41.   The greatest weakness of public transport in Brent is in bus services. Due to traffic congestion and a lack of dedicated infrastructure, buses are often stuck in traffic, leading to slow travel speeds and a lack of travel time reliability.

Planned improvements

3.42.   Brent is strongly supportive of TfL's ongoing line upgrade programmes to increase frequency and capacity of services, along with improving step-free access at its stations and modernising rollingstock, signalling and operational infrastructure. Notwithstanding this support, Brent will continue to lobby for upgrades to the condition of rollingstock and signalling on the Bakerloo and Piccadilly lines to be prioritised and brought forward from current expected timeframes, where possible.

3.43.   TfL also has an ongoing Pinch Point funding programme aimed at removing barriers to bus services by either altering routes or providing facilities to enable services to avoid congestion. There are sites identified by TfL in Brent that will be subject to improvements going forward.

3.44.   It is projected that these improvements will result in greater capacity on the effected lines and will help to achieve the objectives of the MTS and therefore of this LTTS.

Future lobby work

3.45.   The largest change in urban development and travel patterns in West London will be delivered by the development of Old Oak Common around the proposed High Speed 2, Crossrail and Great Western Mainline interchange. Brent is strongly supportive of TfL's proposal for inclusion of London Overground services to this area through the provision of new stations to improve interchange accessibility and support regeneration. It is noted that this development provides huge opportunity for regeneration not just of the Old Oak area but also for the locality, including potential improvements to extant transport infrastructure such as Willesden Junction station. This could improve access to and within Brent significantly.

3.46.   Brent will also continue to express support for the expansion of Heathrow as the preferred option for the creation of a hub airport in the London area. It is considered that this option is likely to be the most beneficial to Brent of those proposed due to its greater potential for job creation for Brent residents. This crates potential for greater prosperity and regeneration within the borough.

3.47.   In particular Brent will continue to work with TfL to find route improvements that address the concerns of residents. The availability of bus services, particularly to central London and key borough destinations,

was raised during public consultation as an important issue for many respondents.

3.48. Brent will also seek to engage with TfL to create public transport strategies for areas of the borough which are likely to see significant change as part of regeneration or growth, similar to that produced for the Wembley area.

Target

3.49. As suggested above, Brent has limited control over public transport within the borough, however provision of good services is important to achieving the objectives of this strategy. Therefore, the target included here is based on predictions generated by TfL, which themselves are based on the London Travel Demand Survey.

3.50. Public transport use as a proportion of demand is expected to remain stable at 20% up to 2030. However, if adequate interventions are made, private vehicle mode share is expected to decline from 41% in 2013 to 30% in 2030. Therefore, the LTTS will adopt this as an indicator of success in this area.

Travel Planning

3.51. Expanding from our current good work on work place and school travel plans we are looking at personal travel planning. Travel planning and in particular personalised travel planning is important in reducing car dependency, enabling independent travel and encouraging sustainable travel. Ensuring residents and businesses are aware of travel options and how they can function to their benefit can make a significant difference to travel habits and it has been shown that travel plan measures can yield good cost benefit ratios.

3.52. Currently we have a high number of schools with travel plans. These plans indicate how the school will progress to increasing the number of pupils and staff travelling by active modes rather than by private vehicle. Our future transport strategies, such as cycling and walking will provide further detail on how we are encouraging the uptake of these modes.

3.53. In the past Travel Planning has been mostly associated with new development, however, personalised travel planning is capable of implementation at any stage and can be a useful tool in encouraging behaviour change and identifying travel choices that are right for individuals.

3.54. In recent years technology has advanced and products have become available that enable travel planning to achieve more than would previously have been possible. These take the form of Personalised

Mobility Services aimed at providing seamless, mobile and user-focussed services to customers on a retail basis that enable trips by modes other than the private car.

3.55. This market is supported by a growing younger population, particularly in urban areas, who no longer aspire purely to own and use a car. Younger generations are seeking other services and new alternatives to expensive personal transport and there is growing private sector interest in catering to this market, which is estimated to be worth £9bn annually.

3.56. Provision of Personalised Mobility Services relies on the availability of data, much of which is now gathered by international players including Google. This information is then used to develop, promote and retail services to customers. Much of this data is available in formats which can be utilised at low cost.

3.57. Pilot "Living Lab" projects have already been developed with transport providers, data providers and businesses working together to create a new approach to providing sustainable transport.

3.58. Though this area is yet to be developed to full potential by any sector, due to the long term nature of the LTTS these issues must be included here as they are likely to be of increasing importance going forward. In future this technology has the potential to be the main method by which sustainable transport modes are accessed and therefore could be hugely influential in encouraging take up of specific modes, such as walking and cycling.

Travel Planning Strategy

3.59. As much of the potential for this technology and partnership working with innovative companies is yet to be explored, the LTTS does not seek to set numeric targets at this time for the inclusion of measures into transport planning in Brent. However, it is important that the potential of this emerging method of transport provision is fully explored by Brent in order to enable both efficient use of funds and future-proofing of services.

3.60. Brent will therefore develop a Travel Planning Strategy that will seek to outline the potential of these developments and how they may best be utilised to benefit Brent residents going forward.

3.61. In particular, it is considered that personalised travel planning may provide opportunities to explore the particular needs of individual service users and establish how mobility may best be provided for specific groups, including those with limited mobility, on low incomes or suffering from lack of access to services for other reasons.

4. Reduce conventional vehicular trips on the network, particularly at peak times

4.1. The MTS places an emphasis on the need to reduce trips by conventional cars into and out of London in order to improve air quality and road safety. This is supported by the Office for Low Emission Vehicles, a government department focussed on removing the barriers to low and ultra-low emission vehicle use.

4.2. The LTTS acknowledges that in order to support economic growth, both locally and regionally, mobility needs to be enabled rather than constrained. This strategy therefore does not aim to reduce the total number of trips on the network over a 24 hour period, but to enable many of these trips to take place either in cleaner vehicles or at different times of the day. This will contribute to two main effects:

- Spreading of demand for trips over a longer time period thereby reducing congestion at peak times. This will work in conjunction with increased use of sustainable modes to enable the road network in Brent to flow more freely and therefore avoid buses becoming caught in congestion.
- Transferring many trips which need to be carried out by car into electric or other low-emission vehicles which do not emit N02 or carbon dioxide. They also contribute far less than conventional vehicles to the production of particulate matter. This will result in improved air quality throughout the borough.

4.3. Achieving this will require demand management measures as well as measures to improve the uptake of alternative vehicles.

Freight

4.4. The success of London and the local economy is dependent on the movement of goods as well as people. Also logistics is a major employer with approximately 5% of the London workforce employed directly by organisations whose main activity involves freight transport and logistics.

4.5. Brent has a number of industrial estates that both rely on and generate freight movements. London wide, LGVs and HGVs formed 13% and 4% respectively of all vehicle kilometres travelled on London roads in 2012. This has a significant impact on the network in terms of congestion, road safety and air quality.

4.6. HGVs only form part of the delivery and servicing fleet that operates within the area. Vehicles delivering to private residences and construction traffic also contribute significantly to the number of vehicle movements on the network.

4.7. TfL's document Delivering a Road Freight Legacy sets out aspirations to improve the safety and efficiency of freight activity within London, and focusses on working with freight operators to re-time deliveries outside of peak times and to provide efficient loading facilities.

4.8. Due to the high percentage of vehicle kilometres attributable to freight, it is important that the LTTS also aspires to reduce the amount of peak time freight trips and to encourage where possible the use of alternative vehicles. This supports the Delivering a Road Freight Legacy document and the London Plan.

4.9. Out of hours deliveries and changing driver behaviour to enable deliveries to be made over-night without disturbing local residents could be instrumental in achieving this as it moves trips out of peak time traffic and thereby reduces the impact of freight on the most congested times of day. This has been successfully trialled in Paris, where out of hours deliveries were encouraged through working with operators and retailers to inform them of the benefits of receiving goods out of normal business hours.

Freight Strategy

4.10. Brent is currently working with WestTrans and the other boroughs that form the WestTrans group to formulate a Delivery and Servicing Strategy for the six north-west London boroughs. This strategy will seek to outline an approach and develop schemes to reduce the impact of freight on air quality, road safety and congestion.

4.11. Brent will develop the Brent-specific element of this strategy in coordination with WestTrans. This approach is taken to reflect the fact that freight cannot effectively be controlled on a borough-wide basis, but that a larger geographical area is required in order for policies to have full effect.

4.12. The Servicing and Delivery Strategy will be the main vessel through which research into the best way of encouraging freight movements to occur either after business hours (whilst showing due consideration to the need to keep disturbances to local residents to a minimum) or in a more sustainable form of vehicle will be carried out. It will also seek to address the serious road safety issues generated by freight movement, particularly construction traffic, and the disproportionate impact this has on cyclists and pedestrians.

4.13. The Delivery and Servicing Strategy is due to be adopted by Brent Cabinet in January 2016. As it will contain specific targets these will be incorporated into the yearly reporting on the LTTS to enable assessment of progress to be made. There is therefore no numeric target included here.

Car clubs and ULEVs

4.14.   Car clubs have been proven to be effective in reducing the number of vehicles privately owned by car club members. This in itself is beneficial as it reduces the dominance of the private car in the street scene and will in the future make space available for other user groups.

4.15.   However, if car clubs use low emission or ultra-low emission vehicles the benefits can be dramatically increased due the positive effects on air quality throughout the borough. Electronic vehicle car clubs are therefore highly beneficial and provide a way of both reducing conventional vehicle ownership and use and increasing the up take of ULEV vehicles.

4.16.   At the present time access to ULEVs on a private basis is restricted due to the comparatively high cost of the vehicles and the lack of easily available charging infrastructure. ULEV car clubs can help overcome these boundaries by providing both the vehicle and charging points at an affordable price. This has the added benefit of increasing the exposure of ULEVs to the public and hence expanding the potential market for private owners.

Car club expansion

4.17.   Due to the advantages that car clubs can generate in terms of reduced car ownership and opportunities to introduce more ULEVs, car club expansion will be encouraged within Brent.

4.18.   In order to ensure this is done to the benefit of all residents and can be accommodated in terms of highway usage and infrastructure required, Brent Borough Council will draw up a Car Club Management Plan that will aim to both provide encouragement for car clubs in Brent, but also to provide a framework by which space on the highway can be equitably allocated between both competing car club operators and private vehicle owners. This plan will consider how many bays will be appropriate and how many should be expected to contain charging infrastructure for ULEV/LEV use.

Charging infrastructure

4.19.   Charging infrastructure in Brent is currently insufficient to enable proper expansion of electronic vehicle use. This infrastructure will be required in future years and options for providing this will require further investigation as part of the Car Club Management Plan.

Target

4.20.   Increase the number of car club vehicles available to Brent residents by 20% by 2035.

4.21.   This target may appear conservative, however experience has shown that the re-allocation of parking bays to car club vehicles can be controversial and often difficult to achieve. This target has therefore been set with a view to re-assessing following the five year reviews of the LTTS. If the target appears to be under-ambitious following review it may be reset to stretch achievement.

Parking

4.22.   Parking is an important part of the transport infrastructure for many Brent residents and can have a significant impact on quality of life. However, it is also true that enabling large-scale free parking for residential vehicles can discourage use of sustainable modes, particularly pubic transport which can find it difficult to compete with the convenience of the private car.

4.23.   The local economy is also influenced by parking provision, particularly at service and retail hubs and employment locations. Again, a balance needs to be achieved between providing sufficient parking to support the growth of the local economy and the need to encourage residents and visitors to access these areas by means other than the private car.

4.24.   Parking provision going forward therefore needs to aim to achieve a balance between competing needs. It is known that parking controls, particularly at destinations, can play a significant role in influencing travel choice and therefore in encouraging trips to be carried out by sustainable modes.

4.25.   Permit sacrifice schemes can go some way to reducing demand for residential parking in areas covered by Controlled Parking Zones, as they provide incentive to reduce household car ownership on a voluntary basis.

4.26.   Less on-street parking enables highway space to potentially be re-allocated to other user groups via the provision of cycle paths, improved footways or better public realm. This in turn encourages use by pedestrians and cyclists.

Parking Strategy

4.27.   A Parking Strategy will be developed by Parking Services during the 2015/16 period. This Strategy will seek to analyse the current situation regarding parking in Brent and identify problems and opportunities for improvement.

4.28.   The Strategy will seek to achieve a balance between the needs of residents to park, access to local employment and local retail and service providers, and the need to reduce trips by conventional cars throughout the borough.

5. Support growth areas and town centres to enable acceptable development

Expected growth in Brent

5.1.　London is expected to grow by a significant amount in terms of employment, jobs and population over the next 25 years. Brent will therefore also see considerable growth over this period.

5.2.　Increased growth has the potential to place greater pressure o the transport network and could lead to reduced utility for residents if it is not adequately supported by transport investment.

Population

5.3.　Over the next 20 years, the borough is expected to grow by 66,000 people to reach 396,000 residents. This represents growth of 20% over the existing population.

5.4.　This will result in increased trips on the networks and increased demand for services.

Jobs

5.5.　Brent had a total of 111,000 employee and self-employed jobs in 2011. This is projected to grow steadily to 137,000 by 2036, a growth of 23.5% since 2011.

5.6.　The addition of more jobs within the borough will help reduce unemployment and enable local economic growth. However, it is important that employment locations are fully accessible by all modes and enable equal opportunity for all residents.

Housing

5.7.　Brent's Local Development Framework includes a Core Strategy which states that 21,210 houses will be delivered across Brent by 2026. Of these 89% will be developed within the five growth areas across the borough.

5.8.　It is highly important that these growth areas see sufficient investment to enable sustainable growth in terms of access by modes other than the private car. Increased car use would contribute to congestion on the network and reduced air quality for all residents.

Growth areas

5.9.　Brent currently has five identified growth areas around the borough, providing a focus for increased employment, housing and population. These growth areas have been identified for their ability to concentrate

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[1]Greater London Authority, 2013, *GLA Employment Projections by borough*, Greater London Authority: London [Accessed from http://data.london.gov.uk/dataset/gla-employment-projections]

sustainable development close to transport hubs, in order to help mitigate potential impacts.

5.10. The areas identified can be seen on the map below.

Map inserted by design and present in PDF document

Wembley

5.11. Wembley is the largest Growth Area within Brent, delivering a total of 11,500 new homes by 2026. This represents over half of all the new houses expected borough-wide. Given the scale of this development, a more bespoke transport strategy for the area is being developed to meet the needs of regeneration and economic growth, though this will largely focus on connections to existing rail stations at Wembley Park, Wembley Stadium and Wembley Central.

Burnt Oak / Colindale

5.12. The Core Strategy identifies 2,500 additional homes to be built in this area by 2026. This Growth Area actually forms part of a wider area of growth, the majority of which falls within Barnet.

5.13. Brent officers in partnership with Barnet and the GLA have commissioned architects to develop a public realm and placemaking plan which will contain transport elements for this area going forward. The transport elements will consist of improved connectivity and junction improvements as well as developing a framework for this area which can be used to assess transport aspects of planning applications as they are received.

Alperton

5.14. An anticipated additional 1,600 homes will be built in the Alperton Growth Area. To support this a series of transport improvements are being developed for Alperton which build on the assets of the area including a 1.6 km stretch of the Grand Union Canal, good public transport and the unique Ealing Road town centre.

5.15. A public realm improvement planned for Alperton underground station will provide a gateway into Alperton from the south as well as improved bus stopping facilities and improved public realm in the current space occupied by the station forecourt. This project is being worked on jointly with TfL and will come forward over the life tie of the LTTS

5.16. Additional measures are being developed along Ealing Road including removal of road humps and street clutter, and provision of improved cycle facilities as part of the wider strategic corridor study recommendations. Delivery of these measures is subject to funding through developer contributions (including Section 106 and Community Infrastructure Levy), LIP and grant funds.

South Kilburn

5.17.   The Core Strategy identifies 2,400 new homes within South Kilburn. This area will experience substantial transformation as the council facilitates a shift from the housing estates of the 1960s and 1970s to a compact district set around a traditional street pattern with a substantial increase in the proportion of owner occupied households. This will also impact on the demand for travel within the area.

5.18.   The transport strategy for this area will develop improvements to facilitate better access from South Kilburn into the transport network. This will include improved connectivity to local centres, such as Queen's Park and Kilburn, along with easier access to transport into central London and other town centres in the borough.

Church End

5.19.   The smallest of Brent's growth areas, it is expected that 800 new homes will be delivered as part of the Core Strategy. Church End is to the south-east of Wembley, south of the North Circular Road.

5.20.   Delivery of this growth area will require improved access to public transport interchanges, including making safer, more convenient connections to local town centres.

Supporting Growth

Town Centres

5.21.   Town centres provide access to services, jobs and social activities which are vital to Brent residents. Therefore, providing enhanced access to these areas by sustainable modes is important in enabling residents of new developments to have adequate access to the facilities they need.

5.22.   Town centres in Brent are categorised in a hierarchy according to their functions and roles which take account of size, extent of catchment area, and the range of shops and facilities provided. This can be seen in the table below.

Centre hierarchy in Brent *will be designed*

Major Town Centres	District Centres	Local Centres
Wembley Kilburn	Burnt Oak Harlesden Cricklewood Colindale Willesden Green Ealing Road Wembley Park Kingsbury Preston Road Neasden	Kenton Queen's Park Kensal Rise Sudbury

5.23. Of Brent's two major centres, Wembley has its own Area Action Plan related to its status as the borough's primary growth area. This Action Plan will be the primary means by which increased access will be delivered going forward. This will include access by all modes, but will place an emphasis on sustainable modes.

5.24. Though a number of other areas, including Kilburn, have seen improvements in the recent past with relation to transport, these will need to continue if access to these areas is to be considered adequate to support the levels of development outlined above.

5.25. Brent will therefore provide increased weighting in the LIP for schemes which provide support for town centres, particularly for those that improve access by, and the environment for, walking, cycling and public transport. Where achievable, town centres will also form the basis for major scheme generation and submission of Major Scheme bids to TfL via the LIP.

5.26. The Park Royal Opportunity Area Planning Framework also provides scope through the regeneration to further improve links to Harlesden in association with accessibility improvements at Old Oak Common. These opportunities to improve sustainable access will be taken forward as and when possible.

Strategic links

5.27. Brent has a relatively limited high-order road network (Transport for London Road Network, Strategic Road Network), which plays an important role for freight and traffic which can not be transferred to public transport. While all of Brent's growth areas are located alongside the Strategic Road Network (SRN), it is envisaged that most passenger movements, particularly commuting, will occur by public transport.

5.28. By minimising unnecessary private vehicle traffic, Brent will maintain the greatest potential road capacity for freight, cyclists and pedestrians, whilst also improving traffic flow across the borough. This is particularly the case with radial routes into Central London, such as the A5 (Edgware Road), A4088 (Dudding Hill Lane / Blackbird Hill) and A404 (Harrow Road). On orbital routes such as the A406 (North Circular Road, A4006 (Kingsbury Road) and A4127 (Sudbury Court Drive), it may be more necessary to provide greater capacity for private vehicle trips which are not able to be completed on public transport

Sustainability and Travel planning

5.29. Levels of growth make it imperative that trips to and from development areas are carried out by sustainable modes to control impacts on the network. Growth areas have been selected to ensure new development is co-located with high quality public transport and to minimise the need for residents to own a private vehicle.

5.30. However, it is also important that new residents are provided with high-quality information regarding the travel choices available to them. New residents moving into the area are potentially more open to behaviour change and the development of a sustainable transport culture than existing residents, who have already formed habits regarding transport.

5.31. Therefore, it is important that new developments are associated with high-quality, robust travel plans that are adequately monitored. Travel plans should be target-driven and contain measures that can be considered strong enough to truly influence the behaviour of new residents.

5.32. To ensure travel plans are implemented, Brent will continue to work with WestTrans to monitor travel plans to assess their success.

Targets

5.33. Travel Plan compliance to increase by 30% by 2035. We will work with WestTrans to continuously assess the compliance of development with travel plans and seek to increase compliance as development within the growth areas come forward.

5.34. Implementation of this target will rely on working closely with both Planning and WestTrans to provide feedback to developers regarding proposed or existing plans and to ensure targets set within them are achieved.

6. Reduce Killed and Seriously Injured (KSI) incidents and slight accidents on Brent's roads

Impacts of Road Safety

6.1.   Reduction of road casualties is central to the Mayors Transport Strategy and therefore to the Local Implementation Plan. Guidance from Transport for London suggests that going forward the LIP will continue to focus on road safety and that schemes aimed at reducing road casualties should be given some emphasis, though not to the exclusion of other objectives. Given the close relationship between the LTTS and the LIP it is important that this focus is shared.

6.2.   Improving road safety is essential in encouraging behaviour change to achieve greater levels of active travel and an associated reduction in car usage by addressing concerns over personal injury. As outlined earlier in this document, road safety is the primary reason given by non-cyclists for avoiding taking up cycling. It is therefore of great importance that road safety in the borough is improved in order to enable sustainable transport objectives to be met.

6.3.   Road traffic collisions also have significant social and economic costs. The total cost of a fatal accident to the economy is estimated at over £1m, accounting for all aspects including lost revenue that would have been generated by the individual. Accidents can therefore have a significant negative impact on economic growth.

6.4.   Residents of areas which see serious accidents can also suffer from reduced confidence in the safety of their environment, which discourages use of the street scene and can lead to feelings of social isolation. As noted elsewhere in this document, a high-quality environment is important in encouraging active travel, particularly walking.

6.5.   Poor road safety is an equality issue for the borough as different groups within the community can be affected disproportionately. It is known that amongst children, the Black, Asian and Mixed Ethnicity (BAME) population, are more likely than white children to be injured or killed in a road traffic collision[2]. It is also known that areas of deprivation tend to suffer from worse road safety records than other areas.

6.6.   Providing equality of opportunity is a key aspect of both the MTS and the Borough Plan and this is not supported by disparities in the way communities are impacted by road safety. This therefore needs to be addressed within the LTTS.

Brent's current road safety record

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[2] Transport for London, 2014, *Understanding the travel needs of London's diverse communities: A summary of existing research*, Greater London Authority: London

6.7.   Significant progress has been made in the area of road safety by Brent, particularly in relation to accidents resulting in KSIs. Between 2004 and 2012, Brent saw a 45% reduction in KSIs from road traffic collisions3, which placed the borough 7th of the 33 London boroughs. By comparison, London wide KSIs reduced by 28% over the same period.

KSIs - Brent compared to Greater London (2004-2012)

Values indexed to 2004 KSIs:
Brent:155
Greater London: 4169
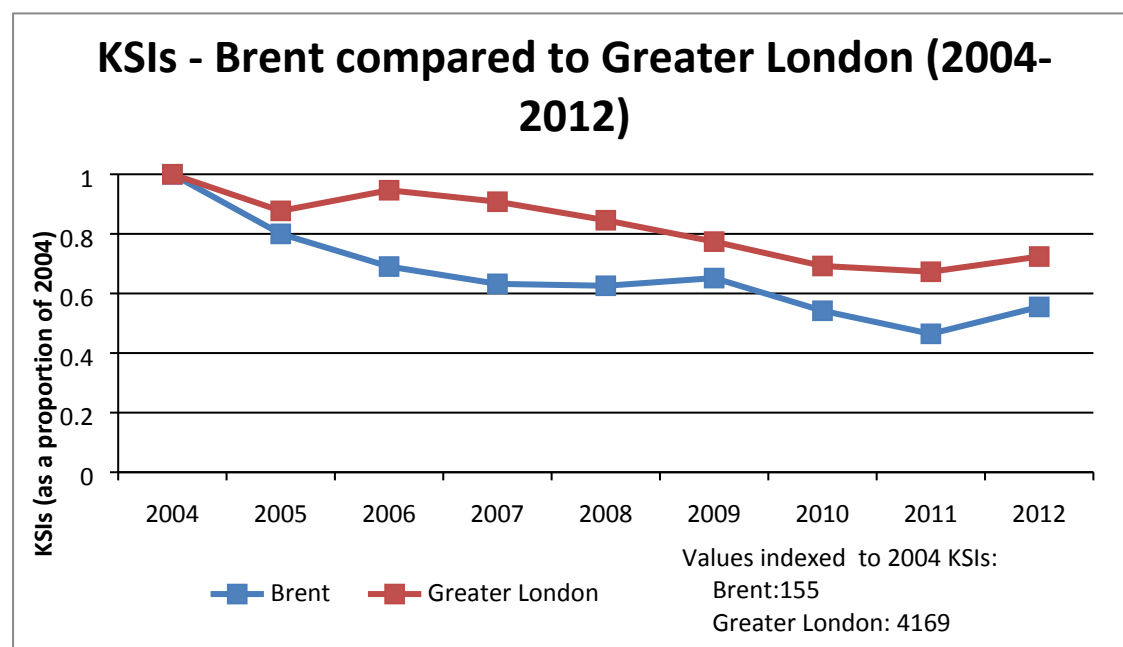
6.8.   Within the West London sub-region, all boroughs have reduced KSIs by a greater proportion than Greater London, with Brent ranked 4th of 7 boroughs for KSI reductions between 2004 and 2012.

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3 Greater London Authority, 2014, *Casualties by Severity (2004-2013)*, Originally published by the Department for Transport, London: HMSO, [Available online: http://data.london.gov.uk/dataset/road-casualties-severity-borough]

KSIs - Brent compared to West London boroughs and Greater London (2004-2012)

Y-axis: KSIs (as a proportion of 2004)

Legend:
- Barnet -35%
- Brent -45%
- Ealing -40%
- Hammersmith and Fulham -29%
- Harrow -45%
- Hillingdon -47%
- Hounslow -46%
- Greater London -28%

Values indexed to 2004 KSIs
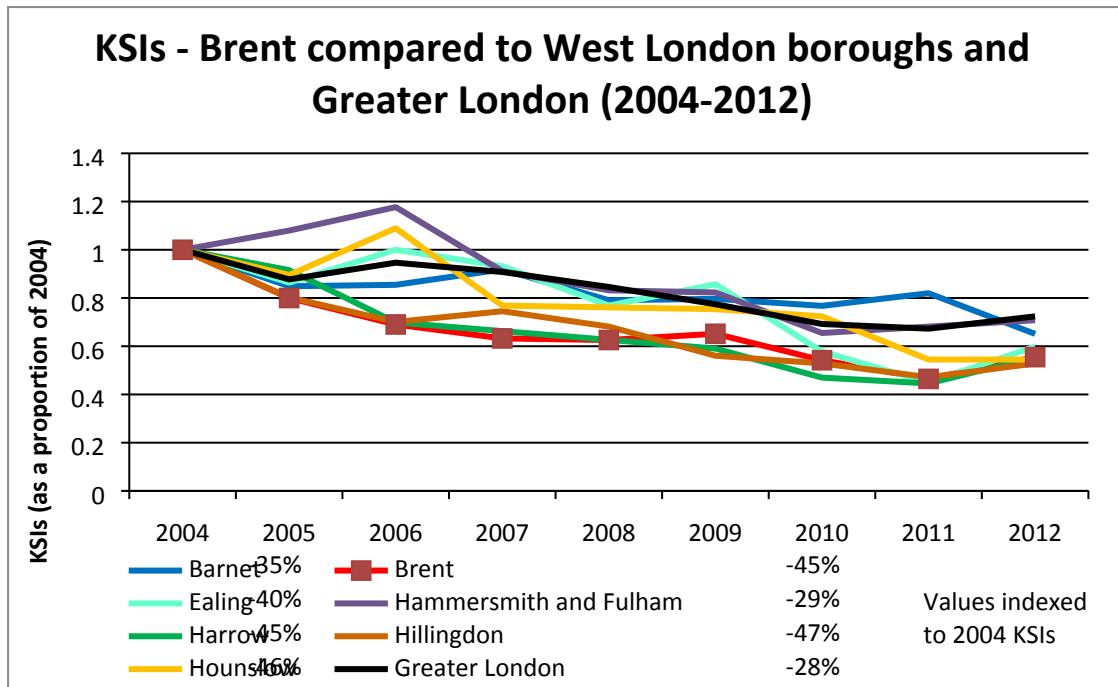
6.9. Brent expects progress on KSI reductions to continue across the borough into the future, as it remains a key focus of the Local Implementation Plan (LIP), the Borough Plan, and the Mayor's Transport Strategy (MTS). However,

Further improvement

6.10. While Brent and all of Greater London have seen considerable reductions in KSIs accidents, reductions in total casualties have not been as dramatic. If all accident data is included a 21% decrease in total casualties in Brent has been achieved over the same 2004 to 2012 timeframe. This is against a 17% drop across London as a whole.

6.11. Though this shows that our roads are getting safer against all accident types, it suggests that success has been heavily focussed on KSI accidents and that more work is required to reduce crashes of all severities. It should be noted that all incidents impact the environment and the quality of life of Brent residents and therefore it is also desirable to reduce slight incidents.

6.12. Addressing slight accidents can be particularly important for pedestrians and cyclists, who may be seriously impacted by incidents that do not result in injury or damage but could potentially have done so. These incidents reduce confidence in the safety of the network and can lead to adverse behaviour change, reverting to car use having been a pedestrian or cyclist.

6.13. It has been noted that in recent years progress has plateaued in comparison with previous years. Though it is not clear at the present time precisely what has caused progress to slow, if the targets set out below

are to be achieved this will need to be addressed via future LIP development and submission.

Targets and monitoring

6.14. These targets have been set as part of the extant LIP and extend to 2020. These have been included in order to provide consistency between the two documents, however it should be noted that they end five years prior to the LTTS. Therefore at the last five-year revision of the LTTS assessment will need to be made regarding how this is taken forward. If the targets have been fully met it is suggested that a five-year stretch-target is produced. If they are not this opportunity should be taken to assess why and to alter the approach if necessary.

6.15. The targets are as follows:

- Brent is aiming to reduce annual KSIs to below 60 by 2020. This represents a 30% decrease from the current level of 84, and over a 60% reduction from 2004.
- Brent's aim is to reduce total casualties to 540 by 2020. This is a 44% reduction from the current level of 957, and a 55% reduction from 2004.

6.16. These targets are ambitious, however as progress in previous years has been rapid it is hoped that with adequate focus they can be achieved.

Implementation

LIP road safety focus and matrix

6.17. As has been stated the LTTS has a close relationship with the LIP and it is expected that schemes included within the LIP will form the action plan of implementation of this document. Given the road safety emphasis of the LIP it is likely that most schemes aimed primarily at reducing collisions will come forward through this mechanism.

6.18. Future LIP submission should therefore consider the further work identified above and seek to include schemes that work towards achieving this.

6.19. The prioritisation matrix that forms part of the LIP has been formulated to enable schemes that will achieve the most benefit against the objectives of the MTS, the Borough Plan and the LTTS to receive funding. This is particularly focused on investment in relatively small-scale local safety schemes to meet specific localised safety issues, such as pedestrian crossings, cycling facilities, traffic calming or local speed compliance.

6.20. Major schemes can also be submitted as part of the LIP and will be fully reflective of the targets set out here.

6.21. Accident statistics are monitored regularly by officers at Brent and the Greater London Authority, and reported each year as part of the LIP

process. This will ensure Brent remains aware of progress made and to be made in order to meet targets.

Freight Strategy

6.22.   It is acknowledged by Transport for London as part of the forthcoming Servicing and Delivery Strategy that freight represents a particular safety concern, particularly for vulnerable road users. HGVs are involved in a disproportionately large number of cyclist fatalities in London and ways of addressing this are being sought.

6.23.   Brent is currently working with WestTrans to develop a Delivery and Servicing Strategy that will be implemented in the six north-west London boroughs. It is expected that his strategy will address road safety concerns specific to freight in Brent.

Highways Asset Management Plan

6.24.   The Highways Asset Management Plan is designed to ensure all Council highway assets are maintained in the most efficient manner to benefit the borough. This includes highway network assets which play a key role in road safety, for example traffic lights, pedestrian crossings and cycle facilities.

6.25.   It is important to ensure that emphasis is placed on maintenance of these assets to enable them to provide meaningful facilities for those using them. In particular, cycle and pedestrian facilities should be maintained to an adequate, safe standard.

20 mile per hour zones

6.26.   20 mile per hour zones have been shown to improve road safety by reducing traffic speed. This reduces both the quantity of accidents and the severity of those that occur. However, it must also be acknowledged that there are some roads within Brent that may not be suitable for implementation of a 20mph limit, such as those leading directly off the strategic network. In order to fully inform the development of both 20mph limits and other speed limits Brent Borough Council will develop a Speed Limit Policy.

7. **Reduce the exposure of Brent residents to Particulate Matter (PM) and NO$_2$ generated by the transport network**

5.36. Air quality improvement measures have previously been focussed on the reduction of carbon and CO$_2$ production. However, in recent years it has become apparent that particulate matter and NO$_2$ pose the most significant risks to the health of those exposed to them on a regular basis.

5.37. Evidence shows that fine and ultra fine particulate matter present in air pollution increases the risk of cardiovascular morbidity and mortality. Conventional vehicles are responsible for 41% to 60% of air pollutants in the UK, which have an impact on cardiovascular and respiratory diseases.

5.38. It has been shown that NO$_2$ acts as an irritant, exacerbating respiratory conditions and contributing to premature deaths, particularly in vulnerable members of the population such as those with asthma. NO$_2$ is generated as part of the combustion process that takes place in conventional cars.

5.39. Particulate matter can enter the body through the lining of the lungs and creates inflammation. In particular, particulate matter has been shown to contribute to conditions that have an inflammatory element, such as heart attack and stroke. It is uncertain precisely how many deaths are brought forward by the presence of particulate matter, however, it is estimated to be a significant number.

5.40. Though not all particulate matter is generated by transport, diesel engines do produce significant amounts as does friction on the road surface and other moving parts.

5.41. Reducing the exposure of Brent residents to both of these substances will directly contribute to improved health and longer life. Though it is not achievable through this strategy to reduce exposure from the transport network to 0 due to the nature of transport and the built environment, there are some measures that are achievable that will both reduce overall levels of air pollution and lessen the exposure of individuals.

Reducing exposure

5.42. There are two main ways in which the exposure of Brent residents to this type of pollution can be controlled and reduced. These are reduction in the overall production of the pollutants and avoidance of the pollutants that are still produced.

Reduction

5.43. All the objectives of this LTTS will contribute to improved air quality through reduced vehicle trips on the network. In particular increased use of sustainable modes and reduced peak-time freight movements combined with greater use of LEVs and ULEVs will contribute to improved air quality. However, there are some specific measures that relate more closely to air quality.

5.44. The Transport Emissions Road Map (TERM) produced by Transport for London in 2014 identifies a number of measures that may be implemented in the boroughs to reduce the production of pollutants. Among these is the introduction of Low Emission Neighbourhoods which identify particular areas as zones in which heavily polluting vehicles are limited or controlled.

5.45. Though the introduction of these would be supported by the LTTS it should be noted that the terms on which they are implemented should be considered carefully to avoid inequitable impacts on residents.

5.46. It must also be considered that the current Transport for London bus fleet runs on diesel, which produces high levels of particulates. There are no current plans for this fleet to be changed for one running on alternative fuels, so this restriction must be considered when introducing restrictions.

5.47. However, due to the large number of bus routes running through Brent and in particular certain strategic corridors Brent will continue to lobby TfL for changes to the local bus fleet to reduce dependency on diesel.

5.48. The TERM also identifies the possible introduction of an Ultra Low Emission Zone covering greater London which would operate on similar terms to the current Low Emission Zone but would enforce tighter emission standards on vehicles entering greater London.

5.49. Though it is uncertain as yet how this will come forward on a London wide basis, the LTTS would support the introduction of a borough-wide low emission zone. This would give Brent Borough Council control over implementation and therefore the ability to mitigate any potential negative impacts on local residents. Further research would be required to take this forward should the opportunity to gain funding arise.

Avoidance

5.50. It has been shown that for particulate matter distance from the source of pollution makes a significant difference to the level of exposure suffered. Therefore, increasing the distance and introducing barriers could help to reduce the exposure of residents to this type of pollution.

5.51. In some areas this may not be achievable due to the constrained nature of the network. However in new schemes and in particular schemes that incorporate a strong element of place making, enabling a greater distance between the road surface and shop fronts and footways would be of benefit to the health of local workers and visitors.

5.52. In some areas is may also be possible to introduce barriers such as plating, that constrains the particulate matter and reduces the amount that reaches the footway and frontages.

Air Quality Strategy

5.53.   Regulatory Services are currently working to produce an Air Quality Strategy that will focus on providing measures to reduce the production of particulate matter and nitrogen dioxide by local transport.

5.54.   It is noted that ensuring that the LTTS and Air Quality Strategy work together to achieve their common goals will be an ongoing process. To this end it is expected that the objectives and targets of the Air Quality Strategy will be taken into account in the daughter documents of the LTTS, as outlined earlier in this document. As stated in the introduction, these documents will form the implementation plan for the LTTS, therefore they are the most appropriate vehicle by which to ensure the Air Quality Strategy is taken forward by the LTTS.

5.55.   Due to this, the LTTS will not set out specific air quality targets, but will utilise those set and monitored by the Air Quality Strategy to gauge success against its objectives.

8. Targets

The base years for these targets vary according to the data available. For those for which data is available this is 2013/2014 however for others it will be 2015 as data needs to be gathered so a base line can be set. These targets will be reported annually to assess progress towards achieving the objectives to which they relate.

Objective	Category	Target	Base year	Target date
Increase the uptake of sustainable modes, in particular active modes	Cycling	Increase mode share to 3% from 1%	2013	2021
		Increase the number of cyclists from currently underrepresented groups by 200 as indicated by the London Travel Demand Survey	2014	2021
		Increase the number of cycle parking spaces by 1000 by 2021	2014	2021
		Increase number of adults accessing cycle training by 50 adults per year	2015	2021
		In crease the number if children accessing cycle training by 50 children per year up to 2021	2015	2021
	walking	10% decrease in the number of schools with gold standard travel plans	2015	2025
		5% increase in pedestrian mode share	2013	2030
	Public transport	30% mode share for private vehicles	2013	2030
	Travel planning	Production of a Personalised Mobility and Technology Strategy	NA	2018
Reduce conventional vehicular trips on the network, particularly at peak times	Freight	Will be contained within the Servicing and Delivery Strategy	NA	NA
	Car clubs	20% increase in car club vehicles available to residents	2015	2030
	Parking	Will be contained within the Parking Strategy	NA	NA
Support Growth Areas and Town	Travel	Increase compliance with travel plans by 30%	2015	2025

Centres to enable acceptable development	planning			
Reduce KSI incidents and slight accidents on Brent's Roads	KSI	Reduce KSIs to below 60	NA	2020
	All accidents	Reduce all accidents to below 240		2020
Reduce the exposure of Brent residents to particulate matter and NO2 generated by the transport network	NO_2 and PM	Will be contained within the Air Quality Strategy	NA	NA

9. Monitoring

Reporting

9.1. The targets outlined in chapter 8 will be monitored and reported to cabinet on a yearly basis. The targets identified as being included in other strategy documents will be monitored by the relevant teams and included in the report.

9.2. The report will set out progress against the objectives and identify areas where either further work is needed or a different approach might be required to achieve the objectives.

9.3. Every five years the LTTS will be reviewed in its entirety and examine long term trends and enable inclusion of documents and issues that have come on-line since the LTTS was first produced. This will also provide an opportunity to examine the achievability of targets and review them if necessary.

Funding

9.4. The Long Term Transport Strategy will be funded through a variety of sources. These will include the annual LIP submission and other Transport for London funding streams as and when they are established and become available to Local Authorities. However it is acknowledged that if the objectives are to be achieved other funding sources will be required.

9.5. Funding will therefore also be sought via bidding processes both nationally and internationally, with applications for European funding being made when appropriate.

9.6. Opportunities to take advantage of funding to establish pilot and highly innovative schemes will also be sought in order to enable Brent residents to benefit from advances in technology and infrastructure design.

9.7. Opportunities to co-fund schemes and projects with other service areas within the council will also be sought in order to enable best use of the funding available. This concept will also be applied to partnership working with the private sector, in particular in the development of new schemes that may benefit from sponsorship.

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Response	Consultation document	Revised draft LTTS	BBC Comments
The way the LTTS is structured makes it difficult to follow. It would be beneficial to set out the vision, aims and objectives of the strategy before considering other issues.	Can be seen in Chapter 7, page 31 of Appendix B	Can be seen on pages 7 to 11 of Appendix A.	These have been revised to reflect the results of the public consultation
The current document structure fails to enable a good understanding of the issues surrounding forthcoming growth in the borough and how investment will be focussed to enable this. A more accessible structure would enable a better understanding		The new document structure can be seen throughout Appendix A	The revised draft LLTS has been restructured in its entirety to enable a better understanding of the subject matter and to enable a more objective-led approach to investment.
The strategy is currently not sufficiently explicit with regards to how it will deliver on the objectives set. It is suggested that the strategy needs to be more specific in its delivery mechanisms and that perhaps these should be reflected in the Targets.		A summary of the SMART targets set can be seen on pages 44 and 45 od Appendix A	The revised draft LTTS seeks to clearly set out under each heading how the objective will be delivered. Targets have been developed specific to each objective and have been formulated to be SMART and monitorable.

Response	Consultation document	Revised draft LTTS	BBC Comments
The Consultation document contains 11 targets which aim to provide attractive, safe and sustainable neighbourhoods. However, it is not made clear how these targets relate to the Objectives or the Priorities and hence they appear to lack direction. They also fail to set any mechanism by which progress against them may be monitored, i.e. they are not SMART.		A summary of the SMART targets set can be seen on pages 44 and 45 od Appendix A	
It is unclear how these priorities were arrived at as no evidence base or public/stakeholder consultation results are provided to suggest where they originated.		Evidence for priorities and objectives can be seen on pages 9 and 10 of Appendix A	The priorities set out in the revised draft LTTS are backed up with consultation results as set out specifically in Chapter 2 of Appendix A.

Response	Consultation document	Revised draft LTTS	BBC Comments
HS2 and Crossrail should be addressed within the LTTS	Brent is well placed to benefit from improved connectivity to Europe as a result of the new HS2 international station at Old Oak. Brent is supporting the TfL petition for inclusion of a link between HS2 and HS1. This link should be provided without undermining existing or future passenger and freight services on the North London Line. A link between Crossrail and the West Coast Main Line would result in much improved connectivity for the Wembley Area to central London, Heathrow and other national destinations.	Inclusion of Cross rail and HS2 can be seen on page 19 of Appendix A	This response incorporates a number of separate responses received that were in favour of incorporation of Cross Rail and HS2
Improved bus services are needed throughout the Borough linking Brent to central London and other destinations, including orbital routes	Brent supports the enhancement to bus services through improvements to frequency as well as extending, amending and creating new services based on future demand. This means more frequent services where possible and improved routing of services where appropriate.	These comments have been incorporated on pages 19 and 20 of Appendix A	This comment incorporates a number of responses received in favour of improved bus services. It should be noted that Brent can lobby TfL for improvements but does not directly control bus services within the borough.
We strongly support the commitment to improving the public realm within Brent's town centres.		This response has been included on pages 16 and 17 of Appendix A	

Response	Consultation document	Revised draft LTTS	BBC Comments
There are omissions around health care		Please see Chapter 2: Cycling, Chapter 2: Walking and Chapter 7: reducing the exposure of Brent residents to PM and NO_2	The contribution of transport to health and wellbeing is now incorporated throughout the document. The lack of emphasis on this issue was highlighted in a number of responses as a gap in the LTTS.
The table of policies in chapter 7 is contradictory in places	Tables 7.2 to 7.10 Chapter seven of Appendix B	See Appendix A pages 4 to 6	Due to the long-term nature of the LTTS and its primary purpose as a guidance document for future policy formulation and funding allocation, it does not contain a detailed action plan of measures to be implemented independently. It is not the purpose of this document to provide details of specific schemes. This detail will be contained in the annual LIP submission that will be formulated to reflect the objectives of the LTTS and other relevant borough and regional policies.

Response	Consultation document	Revised draft LTTS	BBC Comments
Cannot ascertain from the consultation document whether future year forecasts have been produced and whether future year scenarios have been modelled.		See Appendix A pages 4 to 6	Due to the long-term nature of the LTTS and its primary purpose as a guidance document for future policy formulation and funding allocation, it does not contain a detailed action plan of measures to be implemented independently. It is not the purpose of this document to provide details of specific schemes. This detail will be contained in the annual LIP submission that will be formulated to reflect the objectives of the LTTS and other relevant borough and regional policies.
Policy T2.3 supports freight access to key national destinations outside London. We would be supportive to improvements within Brent and beyond to the M1 in so far as they create a joined up approach to freight movement and help to foster economic development through reduced freight journey times and improvements to journey time reliability.	Support improved freight access to key national destinations outside London	This response has been incorporated within Appendix A pages 23 to 24	

Response	Consultation document	Revised draft LTTS	BBC Comments
Policy T7.5 aims to promote employment parking management plans with a justification of management of air quality and peak hour flows. We would support such measures.	To promote parking management plans for business parks and employment locations	This comment has been incorporated within Appendix A pages 21 and 26	
I want to see more emphasis on transport that benefits Londoners in other, neighbouring local authorities, perhaps to the detriment of us.			It is not Brent Council policy to act to the detriment of Brent residents. This comment therefore has not been taken forward in the revised document.
Both the current London Overground consultation at Old Oak Common, and the December 2014 HS2 Ltd consultation about "Crossrail to the West Coast Main Line" are relevant to your document, given their time-scales.		This comment has been incorporated within Appendix A pages 19 to 20	Both the consultations referred to were responded to separately
Crossrail will be important to the Borough and should be noted within the LTTS		This comment has been incorporated within Appendix A pages 19 to 20	This response summarises two separate communications containing the same message
Consideration should be given to potential adverse impacts of increased bus services on local areas			These issues will be addressed in partnership with TfL on an individual basis and therefore do not form part of the LTTS, which is a high-level document.

Response	Consultation document	Revised draft LTTS	BBC Comments
We strongly support the development of the Brent cycling strategy		This comment has been incorporated within Appendix A on pages 14 and 15	
There is no case apparent for more routes as there are already excellent tube, rail and bus links in the Salusbury Road area,			This comment is specific to the Salusbury Road area and as such will be addressed separately through liaison with TfL
There are 3 schools in Salusbury Road and additional ones just north and south of here. Any school expansion plans need to recognise that the area is already under huge pressure during school start and end times			This comment is specific to the Salusbury Road area and as such will be addressed separately rather than through the LTTS
Lack of focus on disability issues			The LTTS has been subjected to an Equality Assessment to ensure it does not work to the detriment of disabled people or other protected groups.
T2.4 which encourages freight mode shift to rail could conflict with policy T3.3 which encourages the greater use of the Dudding Hill line for passenger services unless careful consideration is given to implementation.	Support rail-based freight and restrict road based through-freight movement to the North Circular Road or specified radials. Support the use of Dudding Hill freight line for passenger services.	Please see Chapter 1 pages 4 and 5 of Appendix A	Due to the strategic nature of the document and the further work carried out, the LTTS no longer contains a table of specific policies. It is expected that the specific schemes will be contained within other strategy action plans, which ill be formulated with reference to the objectives of the LTTS

Response	Consultation document	Revised draft LTTS	BBC Comments
TfL would encourage the council to explore opportunities to see how it can facilitate and promote the benefits of out-of-hours deliveries and where those opportunities may exist to amend local transport and planning restrictions to enable out-of-hours deliveries		This comment has been incorporated within Appendix A on pages 23 and 24	
There could be a more specific focus on pedestrians and walking within the borough as there is in the cycling section of the document, given how many trips will either start or end with a journey on foot.		This comment has been incorporated within Appendix A on pages 13 to 18	Sections on both these modes have been incorporated
Living Streets feels the strategy could go further to ensure a truly holistic approach to future transport plans in the borough.		This comment has been taken forward throughout Appendix A	
Improve public health - in line with the Mayor's transport and health action plan1 and Brent's Health and Wellbeing Strategy.		This comment has been incorporated within Appendix A on pages 13 to 18 and 40 to 42	We have sought to incorporate transport's influence on health throughout the document
Increase the number of people walking - by improving the walking environment.		This comment has been incorporated within Appendix A pages 17 and 18	
Living Streets would like to see a greater focus on creating people-friendly places and a reduced emphasis to car based traffic		This comment has been incorporated within Appendix A pages 17 and 18 and 23 to 26	

Response	Consultation document	Revised draft LTTS	BBC Comments
We broadly support the strategy for District and Local Centres, but feel the statements should be made more explicit.	The strategy for all of our District and Local centres is to: Improve access to public transport interchanges, particularly rail and tube stations: Improve access to public transport interchanges, particularly rail and tube stations; Improve pedestrian / cycle links; Improve air quality; Improve parking provision; Address and, where possible, reduce through traffic.	This response has been taken forward in Appendix A pages 28 to 34	
The Mayor of London has set a road casualty reduction target of 40% by 2020 and a long term ambition of freeing London's roads from all deaths and serious injuries 4. Owing to the long term nature of this strategy, we would encourage Brent to make a similar statement of intent.	See page 25 of Appendix B	This response has been incorporated within Appendix A pages 36 to 39	
Living Streets is in strong support of the greater use of 20 mph speed limits or zones in Brent on streets where people live, work and shop - including local high streets and town centres.	See page 25 of Appendix B	This response has been incorporated within Appendix A on page 39	
Achieve balance between northern and southern halves of the borough, particularly in relation to regeneration areas	☐		This comment has not been taken forward as it is not within the scope of the LTTS to define development areas

Response	Consultation document	Revised draft LTTS	BBC Comments
Reducing existing traffic congestion hotspots	☐	This response has been incorporated throughout Appendix A and has been set as a priority as seen on page 9	Congestion reduction was set as a priority for the draft LTTS following consultation
Reducing the number of buses using Chamberlayne Road	.		This comment has been addressed separately as it does not fall within the scope of the LTTS
Improve conditions for cyclists	See pages 26 and 27 of Appendix B	This response has been incorporated within Appendix A on pages 13 to 15.	
Improving air quality throughout the borough is important		This response has been incorporated within Appendix A on pages 41 to 42	Improving air quality and reducing exposure of Brent residents to NO2 and Particulate matter has been incorporate as an objective within the revised draft. This is to reflect both comments received during consultation and the policy context.
There has been no discussion about night buses			Brent will continue to lobby TfL for improved bus services and will take this comment forward as part of this process.

Response	Consultation document	Revised draft LTTS	BBC Comments
There is no mention on improving transport around schools and hospitals, but it would be key to take this into consideration.			Due to the strategic nature of the LTTS this comment has not bee addressed directly. The LTTS does not contain an action plan but provides guidance as to how future investment in transport might be focussed. It is expected that this comment will be taken forward through daughter documents, such as the cycle strategy and travel plan strategy
Much of this is outside the council's direct control - or it's ability to fund schemes			Though it is true that Brent does not have control over all the elements outlined within the LTTS, Brent does play an important role in lobbying for schemes and other improvements that will benefit Brent residents. This is why the LTTS takes a broad remit and seeks to provide direction as to this.
More overground options needed			Brent cannot address this directly but will seek to lobby TfL to take this forward if possible
Cycling routes need to be kept separate from both heavy traffic and pavements, for the safety of both cyclists and pedestrians			This comment will be taken forward as part of the Cycle Strategy

Response	Consultation document	Revised draft LTTS	BBC Comments
Rail services from Wembley Central station need to be improved i.e. the Southern Rail service should run into the late evenings on weekdays and Saturdays and a Sunday service is required.			This comment is will be taken forward in lobbying TfL for improved services.
A proper crossing with lights is needed on Wembley Hill Road opposite the entrance to The London Designer Outlet.			This comment is too specific to be taken forward as part of the LTTS, however it will be forwarded on as a service request
Not enough buses serve the new Civic Centre.			This comment is too specific to be taken forward as part of the LTTS, however we will continue lobby TfL for improvements of this nature.
You need to accept that people need to use cars and need to park at reasonable distance from their destination. Not everyone can get on a bus		This comment has been incorporated within Appendix A on pages 23 to 26	
No mention of improving commuter links particularly Chiltern Line service to and from London & High Wycombe			This comment will be taken forward in continuing lobby work with TfL
Car clubs not given emphasis		This comment has been incorporated within Appendix A on pages 24 and 25	

Response	Consultation document	Revised draft LTTS	BBC Comments
This policy does not take into account the negative effects on specific areas such as Cricklewood where there will be increased traffic and pollution and reduced direct transport links to the centre of the city and the interchange at West Hampstead.			the LTTS does not seek to address specific development proposals. However Brent Borough Council will continue to work with both Barnet Borough Council and its chosen development partners to represent the interests of Brent residents with regard to impacts on the road network.
I would prefer an absolute commitment to improve air quality		This comment has been incorporated within Appendix A on pages 40 to 42	
There should be a blanket 20mph speed limit across the Borough for road safety,		This comment has been incorporated within Appendix A on page 39	
The Cycle Strategy is needed as soon as possible and should incorporate bike parking and other facilities for cyclists, including showers etc.		This comment has been incorporated within Appendix A on page 14	The Cycle strategy will contain specific actions for encouraging cycling therefore the comments regarding parking and showers will be taken forward in as part of the cycle strategy, rather than being set out within the LTTS.
local car users are not catered for within the LTTS		This comment has been incorporated within Appendix A on pages 23 to 26	
The quality of local roads needs to be considered			This will be taken forward as part of the Highways Asset Management Plan

Response	Consultation document	Revised draft LTTS	BBC Comments
A Low emission strategy is essential		This comment has been incorporated within Appendix A on pages 40 to 42	
Hs2 will divert funding away from local projects and have a detrimental effect on local communities in Brent, other London Boroughs and Counties outside London	See page 14 of Appendix B		Brent Borough Council has expressed its support for both HS2 and Crossrail as far as they benefit the residents of Brent. Therefore, it is not possible to take this comment forward at this time.
Expanding Heathrow will bring substantial noise pollution to yet another London Borough - Brent. It will also increase air pollution and contribute negatively to climate change.	See page 12 of Appendix B		Brent Borough Council has expressed its support for Heathrow as the preferred option for the development of a hub airport for the London area. It is therefore not possible to take this comment forward at this time
I believe the improvement and support of the public transport system is the way forward, this includes more bus lanes and night services. This would encourage car owners to use their vehicles less and less need for public parking spaces.	See page 24 of Appendix B	This comment has been taken forward within Appendix A pages 19 to 20	
Objective 10 "To improve air quality and contribute towards climate change targets" - should refer to Brent Air Quality Action plan	See page 31 of Appendix B	This comment has been taken forward within Appendix A pages 40 to 42	

Appendix C – Numerical results of public consultation

1. To what extent do you agree with the three Priorities

Responses	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
Improve bus travel	69.20%	23.10%	7.70%	0	0
Improve cycle facilities	50.0%	25.0%	14.1%	4.7%	6.3%
Improve travel information	50%	30.60%	12.90%	3.20%	3.20%

2. To what extent do you agree with the eleven Targets?

Responses	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
Discourage short car trips	43.8%	29.7%	9.4%	12.5%	4.7%
Promote walking and cycling	56.9%	27.7%	12.3%	3.1%	0.0%
Improve public transport information	49.2%	33.8%	15.4%	0.0%	1.5%
Encourage residents of new developments to walk and cycle	44.6%	20.0%	21.5%	9.2%	4.6%
Use Controlled Parking Zones to manage parking	23.1%	23.1%	24.6%	13.8%	15.4%
Use parking restrictions to encourage sustainable travel	27.7%	15.4%	15.4%	18.5%	23.1%
Work with communities to ensure schemes meet local needs	61.5%	27.7%	7.7%	1.5%	1.5%
Make local street attractive	75.4%	18.5%	6.2%	0.0%	0.0%
Introduce street trees	64.1%	17.2%	17.2%	1.6%	0.0%
Improve facilities to reduce obstacles caused by large roads and railway lines	64.6%	10.8%	20.0%	3.1%	1.5%
Ensure access to services, employment and parks and recreation areas	63.1%	26.2%	10.8%	0.0%	0.0%

3. To what extent do you agree with the twelve Objectives?

Responses	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
Improve international links to Brent	27.7%	15.4%	43.1%	10.8%	3.1%
Improve national and regional links to Brent	40.0%	30.8%	24.6%	3.1%	1.5%
Improve sub-regional links to Brent	46.9%	34.4%	17.2%	1.6%	0.0%
Support Brent's Growth Areas	45.3%	23.4%	29.7%	1.6%	0.0%
Improve the North Circular Road regeneration area	51.6%	28.1%	18.8%	1.6%	0.0%
Improve Brent's town centres	70.8%	21.5%	7.7%	0.0%	0.0%
Support employment locations	60.0%	26.2%	13.8%	0.0%	0.0%
Create sustainable, attractive and safe neighbourhoods	76.9%	20.0%	3.1%	0.0%	0.0%
Improve road safety	67.7%	23.1%	7.7%	1.5%	0.0%
Improve air quality and reduce emissions	64.1%	18.8%	14.1%	1.6%	1.6%
Support improved bus services	63.1%	29.2%	7.7%	0.0%	0.0%
Ensure provision of high quality cycle links	46.9%	25.0%	14.1%	9.4%	4.7%

4. To what extent do you agree with these policy statements?

Responses	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
Expand the hub at Heathrow airport	28.6%	20.6%	20.6%	15.9%	14.3%
Build HS2 and new station at Old Oak	41.5%	12.3%	30.8%	6.2%	9.2%
Keep freight and through traffic on main roads	33.9%	30.6%	22.6%	1.6%	11.3%

Increase capacity on train services between Milton Keynes and Croydon	41.3%	11.1%	42.9%	1.6%	3.2%
The creation of public transport hubs to improve access within Brent	58.5%	24.6%	13.8%	3.1%	0.0%
Improve air quality where possible	68.8%	17.2%	10.9%	0.0%	3.1%
Increased capacity on London Overground and Thameslink routes	67.7%	21.5%	9.2%	1.5%	0.0%

5. Taking this and the rest of the information into account, do you agree that the Long Term Transport Strategy will benefit Brent?

Responses:	% of responses
Yes	70.3%
No	3.1%

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Long Term Transport Strategy

Department	**Person Responsible**
Everyone	Rosemary Fletcher
Created	**Last Review**
15th May, 2015	15th May, 2015
Status	**Next Review**
Complete	8th October, 2015

Impact Assessment Data

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

5.1 Age (select all that apply)

- Positive
- Neutral

The objective of the LTTS is to provide guidance for future investment in transport throughout the borough. It does not in itself contain schemes which may be detrimental to certain age groups, however the general content of the LTTS is likely to be positive as one of the key concepts is improving the quality of the urban realm for all users and increasing access to modes of transport such as walking, which are age-neutral. It may also benefit young people by improving access to cycling and public transport, which are accessible without a driving license.
Responses to the public consultation carried out as part of the development of the LTTS did not suggest that members of the public or stakeholders had concerns over the impact of the strategy on particular age groups. Relevant stakeholders specifically consulted included (inter alia) Age Concern, schools and assisted living organisations. None of these groups provided any comment or highlighted any concerns.
The respondents to the public consultation were split over the age groups, as can be seen in the document uploaded with this assessment that sets out the results of the monitoring questions that formed part of the questionnaire. The respondents were comparatively evenly distributed over the 25 to 64 year old age groups, with fewer responses from those in the 16 to 24 and 65+ age groups. However, it should be noted that though they were not a majority 9.4% of respondents were from the 16 to 24 age group. With the largest majority group being 40 to 45 at only 20%, this suggests the younger population was adequately represented.
Census results indicate that 25% of the population of Brent are aged between 30 to 44 years old. 37.64% of responses came from this age group, suggesting it is reflective of this group.

5.2 Disability (select all that apply)

- Positive
- Neutral

Consultation carried out as part of the development of the LTTS did not indicate that organisations concerned with disabled access or welfare believed the contents of the LTTS would be detrimental to those they represent. Steps were taken as part of the process to ensure that all the relevant groups within the borough and where necessary national organisations were contacted to ensure adequate input from those with mobility impairment could be incorporated. However, these groups did not provide comment or raise any concerns.
As can be seen in the uploaded document, 9.3% of respondents to the survey indicated that they have a disability. It is difficult to directly compare this figure with census data as the questions asked in the census refer to whether activities carried out as part of everyday life are impacted by health. This may therefore be interpreted differently to \\\"disability\\\". However, the census indicated that 1 in 7 (14.5%) Brent residents considered that their health had a limiting impact on their day to day activities, 7% of residents felt their day-to-day activities were limited a lot and 7.5% of residents felt their day-to-day activities were limited a little. 9.3% falls within this range and therefore it is felt that those with disabilities were proportionately represented within the consultation. No comments were made to indicate that those individuals identifying as having a disability while responding to the consultation were concerned over how the contents of the LTTS would impact them
The LTTS indicates that Brent Borough Council will work to lobby TfL for improved public transport services and step free access. Along with other measures such as improved urban realm and reduced congestion, it is likely that the net effect on those with disabilities will be positive. However, it should be noted that all the strategies and schemes developed to implement the LTTS will be the subject of their own individual Equality Assessments. Therefore, if concerns arise regarding specific schemes or policies, they will be addressed in full at that stage and if necessary mitigation provided.

5.3 Gender identity and expression (select all that apply)

- Unknown

This characteristic is historically under-reported which makes it difficult to assess whether this group were fully reflected within the results of the public consultation. The census did not gather information on this feature and it was not included in the standard monitoring questions provided as part of the consultation. It is therefore felt that the impacts of the LTTS on gender identity are not known at this time, however no comments were received that would indicate concern from these groups.

It should be noted that as and when schemes or policies come forward with reference to the LTTS Equality Assessments will be produced that will make every effort to reflect all demographic groups within the borough and highlight any impacts that may ensue. However, due to past stigma it can be difficult to achieve high levels of feedback from some groups.

5.4 Marriage and civil partnership (select all that apply)

- Neutral

Questions regarding marriage and civil partnerships were not included within the monitoring section of the questionnaire as the standard format provided did not allow for it. We therefore cannot provide a direct comparison between the respondents and the overall population of the borough. However, it should be noted that the LTTS has been formulated to provide a framework for improvements to the transport networks for everyone. There is nothing to indicate that it will effect those in marriages and civil partnerships differently as they are not differentiated between when accessing either the street networks or public transport.

As pointed out above, all the strategies and schemes that are influenced by or designed to implement the LTTS will be subject to their own individual Equality Assessments at which point further impacts can be identified and mitigated where required.

5.5 Pregnancy and maternity (select all that apply)

- Positive
- Neutral

Questions regarding pregnancy and maternity were not asked by the questionnaire as the standard monitoring questions provided did not include them. Therefore it is not possible to provide a comparison with census data. However, it should be noted that we did not receive comments suggesting that the contents of the LTTS would adversely impact either mothers or pregnant women.

However, the needs of those accessing the transport networks while either pregnant of accompanying young children have been considered and it is hoped that the overall impact on these groups will be positive. This is due to the fact that particularly young mothers are often disproportionately dependent on public transport to access services, therefore continued lobbying for improved bus, tube and train services should result in an increased ability to access services.

Again, any policy or scheme that is developed or implemented as part of the LTTS will be the subject of an individual Equality Assessment in order to ensure any impacts are highlighted and dealt with. Impacts on pregnancy and maternity will be assessed at this time and if necessary mitigation will be considered.

5.6 Race (select all that apply)

- Neutral

As can be seen in the uploaded document, the respondents to the consultation were split over the various ethnic groups identified. Some groups were represented in proportion to the population while some groups were not. In particular, those identifying at white British/ English / Welsh / Scottish / Northern Irish made up 35% of responses, whilst only being 18% of the population of the borough according to census data. Also, those identifying as Asian or Asian British: Indian made up 6.76% of responses, while being 18% of the population according to the census. Other ethnic groups were represented roughly in proportion to their borough wide population.

No comments were received from members of the public to indicate that they felt the LTTS would disproportionately impact on a particular ethnic group.

As part of the stakeholder consultation community groups were contacted to invite them to comment. Contact was particularly sought with groups that have been under-represented in the past within consultations, including those of Asian or Black heritage. However no responses were received from these community groups.

There is no evidence to suggest that different ethnic groups will be differently impacted by the content of the LTTS. The LTTS seeks to set out how transport opportunities might be improved for all residents, businesses and visitors regardless of ethnic group. However, as future Equality Assessments are carried out during the implementation of the LTTS further effort will be made to ensure all groups are represented within public consultation and that their needs are reflected within scheme development.

5.7 Religion or belief (select all that apply)

- Neutral

Responses to the consultation suggest that some religious groups are more proportionately represented within the

results than others. The proportion of responses from Sikh, Jewish and Buddhist residents accurately reflects the percentages of the population made up by these groups. However, it is apparent that the proportion of responses from those identifying as Christian, Hindu and Muslim as lower than their respective populations indicated by the census. Conversely, those identifying as having no religious belief make up a larger proportion of responses than they do the general population.

No comments were received from members of the public to suggest they were concerned regarding potential impacts of the LTTS on their religious group.

Groups representing specific religions were contacts for comment as part of the stakeholder consultation, however we received no feedback from these organisations.

There is no evidence that the contents of the LTTS will adversely or otherwise impact specific religious groups, and the strategic nature of the LTTS should result in an equal impact over the whole population. Therefore, it is felt that at the current time the LTTS is likely to have a neutral impact on religion and belief. However, as further Equality Assessments are carried out on the policies and schemes developed to implement the objectives of the LTTS impacts on religion and belief will be highlighted and defined. At this stage if any group is shown to be at a disadvantage justification will be required and mitigation considered.

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5.8 Sex (select all that apply)

- Neutral

The results of the public consultation indicated that 53% of respondents were male and 43% were female with the residual percentage preferring not to say. This is approximately in line with the proportions shown by the census, which indicates a slightly higher male population than female.

There were no comments received from either members of the public or stakeholders to suggest that either sex believed themselves to be adversely impacted by the contents of the LTTS. Given the high-level, strategic nature of the LTTS it is likely that at this stage impacts will be gender neutral as the contents are designed to benefit all residents of the borough and do not define individual schemes.

As the LTTS is implemented, further Equality Assessments on policies and schemes will seek to further assess how individual elements will potentially impact on gender and whether these impacts are positive or negative. If negative impacts are identified justification and mitigation will be considered.

5.9 Sexual orientation (select all that apply)

- Unknown

As can be seen in the uploaded document, 21% of respondents preferred not to answer the question regarding sexual orientation. The majority of responses were from those identifying as heterosexual, with very few identifying as either lesbian or gay man. From those that did respond, no comments regarding the impacts of the strategy on this group were received.

Groups representing different gender identities were contacted as part of the stakeholder consultation, however no feedback was received from them.

The census did not gather information on this feature so it is not possible to provide a comparison to the population of Brent. It is therefore felt that the impacts of the LTTS on gender identity are not known at this time as there is very little information available.

As the LTTS moves towards implementation further Equality Assessments on individual policies and schemes will seek to more clearly define whether sexual orientation will be a factor in their impact. If issues are highlighted, further work will be required to assess how they might be mitigated.

5.10 Other (please specify) (select all that apply)

- Unknown

6.   Please provide a brief summary of any research or engagement initiatives that have been carried out to formulate your proposal.

What did you find out from consultation or data analysis?
Were the participants in any engagement initiatives representative of the people who will be affected by your proposal?
How did your findings and the wider evidence base inform the proposal?

Data analysis was carried out on the consultation document prior to taking the previous draft of the LTTS out to public consultation. This indicated that the consultation document was equality neutral. However, following public consultation significant changes were made to the LTTS to ensure it reflected the consultation responses and therefore a new Equality Assessment has been carried out.

The public and stakeholder consultation was carried out in summer 2014 and incorporated a questionnaire, events and contacting separately all relevant stakeholder groups within the borough to ask for direct comment. These included groups representing particular sections of the community, such as religious groups, the elderly and young, disabled

and mobility impaired and different ethnicities. The objectives of the LTTS are expected to be implemented throughout the borough, therefore it was felt to be important that as many groups as possible responded to the consultation. There were no comments received to suggest that the LTTS will effect any group adversely as compared with other groups. A full list of comments received has been included as part of the cabinet report. As can be seen in the uploaded document outlining the results of the monitoring questions, some groups were more heavily represented within the results that others, however it is also evident that all groups were represented to some level.

Following consultation, the contents of the LTTS have been altered to make it more reflective of the comments received, particularly regarding air quality, walking, health and disability. The Objectives have been simplified and made more prominent in the document.

The LTTS does not contain an action plan as it is expected to be implemented via the action plans of its daughter documents and the Local Implementation Plan. This is set out in the introduction to the LTTS.

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

   • No

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

   As and when the daughter documents of the LTTS are formulated Equality Assessments will be carried out alongside the development process. These will seek to identify and enhance any positive impacts that they may contain.
   It should be noted that the LTTS is a high-level document that does not contain specific schemes itself. It will be implemented via the formulation and implementation of a series of strategies and policies which themselves will contain actions plans and schemes. Given the fact that the LTTS will only be implemented via these documents it is felt that ensuring the action plans associated with them are positive in their impact is the most effective way of emphasising the positive impacts of the LTTS.

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

   Similar to emphasising the positive impacts, we will ensure that as the daughter documents of the LTTS and the policies and actions they will contain are developed Equality Assessments are carried out as part of the process and as such are best placed to highlight any potential negative impacts that may require further work in terms of justification and/or mitigation. This will then enable us to reduce or remove the negative element from the proposal before it can adversely impact a protected group.

10. Please explain the justification for any remaining negative impacts.

   There will be no further negative impacts

	Scrutiny Committee 12 August 2015
	Report from the Director of Regeneration and Growth

For information	Wards Affected: ALL

Food Standards Audit, July 2014 - findings, response and latest position

1.0   SUMMARY

1.1   This report sets out the background to the July 2014 Food Standards Authority audit of the Council's discharge of its Food Safety Act 1990 duties, the report findings, the council's response and progress since.

2.0   RECOMMENDATION

2.1   Members of the Scrutiny Committee are recommended to note the audit findings, issues arising, response to date and planned next steps.

3.0   DETAILS

Brent's food sector

3.1   As a unitary authority, Brent regulates the local food sector for both food safety (sometimes called hygiene) food standards (sometimes called food fraud) and animal feed. Other key activities carried out by the team include inspection of health and safety at food businesses, investigations of infectious diseases, and accident investigations at food businesses.

3.2   Brent has many more food manufacturers, importers and packers than most other local authorities, including a significant number of manufacturers, many of which require approval under European Regulations. The borough is home to two large industrial estates: - Park Royal and Wembley, and the borough hosts large food operations of regional and national importance. The team takes a lead Nationally on regulation of Ikea, Bestways and Pernod Ricard. This brings many demands to the service, which go beyond that faced by many other London authorities with a more typical food industry profile.

3.3   The ethnically diverse population attracts a wide range of food business operators. In a high proportion of cases English is not the first language either of the population using, or providing the business. In practice, and almost with exception, traders are able to converse in basic English, although this can impact on the time needed for inspection and subsequent guidance for the proprietor.

3.4   Brent has a high churn of food businesses - the average time between changes in management or ownership has previously been estimated to be around 2 years. This leads to a constant flow of enquiries from new business start-ups, and those looking to change or expand their business. There are significant demands arising from food labelling from our many manufacturers and packing businesses which places a significant demand on the service.

3.5   There is demand arising from community events and festivals, such as Eid Diwali and Christmas and commercial events too. Wembley Stadium, Arena, Fountain Studio and other venues attract visitors from a wide area.

3.6   The Authority reported the profile of the London Borough of Brent's food businesses as of 31 March 2014 as follows:

Type of Food Premises	Number
Primary Producers	0
Manufacturers/Packers	104
Importers/Exporters	14
Distributors/Transporters	122
Retailers	708
Restaurant/Caterers	1,608
Total Number of Food Premises	**2,556**

Brent is 11th in the table of 33 London Boroughs as regards the number of food businesses requiring oversight.

3.7   The UK has a well-established methodology for assessing and rating food businesses. This seeks to proportionately ensure that businesses are subject to compliance assessments based on factors such as the risk posed to consumers and the business's previous track record. Businesses that have a high degree of risk and a poor track record are inspected with greatest regularity. Routine inspections for these businesses (category A) are twice a year, with inspections for the least risky with a good track record, being every 3 years.

3.8   The table below shows how many food businesses there are in each of the risk rating categories as reported to the FSA:

Food Safety

Risk category	Businesses (2013/14)	Businesses (2012/13)	London average	Inspection frequency
A	23	20	17	At least every 6 months
B	182	191	139	At least every 12 months
C	1,091	1,087	875	At least every 18 months
D	440	416	415	At least every 2 years
E	504	491	508	At least every 3 years
New/Unrated	95	48	147	High risk: within 28 days Low risk: within 90 days
Outside inspection programme	213	195	49	None. These are premises with the very lowest risk, such as child-minders.
TOTAL	**2,556**	**2,448**	**2,151**	

Food Standards

Risk category	Businesses (2013/14)	Businesses (2012/13)	Inspection frequency
A	52	51	At least every 6 months
B	543	604	At least every 12 months
C	1,579	1,470	At least every 18 months
New/Unrated	94	51	High risk: within 28 days Low risk: within 90 days
Outside inspection programme	190	167	None. These are premises with the very lowest risk, such as child-minders.
TOTAL	**2,458**	**2,343**	

3.9   The profile of food businesses in Brent is given in the table below:

Business type	Total
Manufacturers & packers	104
Importers/Exporters	14
Distribution/Transporters	122
Retailers (food)	708
Restaurants and caterers	1,608
TOTAL	2,556

3.10   Examination of the rolling number of food businesses in the borough requiring inspection, shows a fairly consistent picture of increase over the past 10 years. This is consistent with the increase in population from 265,000 to 311,000 (17.5%) between 2001 and 2011.

Year	Total
2013/14	2,556
2012/13	2,448
2011/12	2,431
2010/11	2,301
2009/10	2,260
2008/09	2,060
2003	1,938

3.11   Since the time of the previous FSA audit in 2003, the number of food premises has increased by 618 or 32%. This is an additional 300 or so inspections per year, which equates to around the work of an additional 2.0 FTE inspectors. During the same period the number of front-line enforcement officers has reduced by 2 and the number of support staff reduced by 4; a net worsening of 8 FTEs in comparison to the workload.

3.12   Examination of more recent change for the most recent reported year, shows an increase in the number of businesses requiring inspection increased by 118 (4.8%) which equates to almost 1.0 FTE inspector in the last 12 months.

Audit background

3.13   Local Authorities have statutory duties to enforce legislation relating to food, and to follow a Code of Practice issued by the Food Standards Authority (FSA) which sets out how and when this should be undertaken, together with expectations regarding the monitoring and reporting of this work.

3.14   The law requires Local Authorities to have regard to this Code when discharging their duties. Competent Authorities that do not have regard to relevant provisions of this Code could find their decisions or actions successfully challenged, and evidence gathered during a criminal investigation being ruled inadmissible by a court. In addition, the Food Standards Agency (FSA) can, after consulting the Secretary of State, give a Competent Authority a direction requiring them to take any specified steps in order to comply with this Code.

3.15   In June 2014, the Food Standards Authority informed the Chief Executive that they would be undertaking an audit of the Council's current arrangements. The authority had last been audited in June 2003, as a result of which the FSA found that "*There were no key areas for improvement*."

Summary audit findings

3.16   The FSA's final findings for their audit were received on 10 December 2014, and were published[1] on 19 January 2015. The report indicated that Brent was selected for audit as statutory returns made to the FSA indicated that there was a high ratio of premises to full time equivalent officers (FTEs) in 2012/13.

3.17   The key findings of the audit report are summarised below:

   3.17.1   The **annual service plan** did not include a detailed enough comparison of staff resource required to deliver the food law enforcement service in accordance with the Food Law Code of Practice[2] (FLCoP), including inspections and unrated establishments and enforcement activities, against the staff resources available to the Authority. The absence of such information makes it difficult to substantiate and quantify any resource shortfalls to senior managers and Members. The plan should also usefully contain an accurate breakdown of the planned intervention programme for the year, including a managed strategy for lower risk rated premises and a detailed review of performance in order to address any variance from meeting the requirements of the previous years' service plans.

   3.17.2   **Database reporting mechanisms** were slow and difficult to navigate and access information. IT support had been centralised so responsibility for overseeing the analysis and reporting had fallen to the Regulatory Services Manager. The Service would benefit from specialist IT support for further development, review and management of the system.

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[1] https://www.food.gov.uk/enforcement/auditandmonitoring/2014/auditreports/brent-london/brent-london-delivery-and-compliance-audit
[2] http://www.food.gov.uk/enforcement/codes-of-practice/food-law-code-of-practice-2015

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3.17.3   There were significant departures from **frequencies for food safety inspections** laid out in the code of practice. Broadly compliant premises were not in general receiving inspections due to a lack of staff resources. The summary report noted the high carryover of establishments which had not been inspected recently and some not for a considerable number of years including a supermarket delicatessen, last inspected nine years ago, and were adding to those inspections due. The total number of establishment overdue interventions at 30 June 2014 was 1,736 - including 14 with risk category rating A, 138 with risk category rating B, and 827 with risk category rating C , - and 137 unrated establishments. In simple terms around three-quarters of all food businesses were overdue for inspection. The report noted that the number of food safety interventions carried out has decreased from 770 in 2011/2012, to 594 in 2012/2013 and to 386 in 2013/2014. The high level of overdue interventions and the reduction in number of interventions were flagged as a specific areas of concern.

3.17.4   The agency interviewed staff and undertook a '**reality check**' at a local food takeaway. They found that the officer was familiar with the operations at the premises, had assessed the business' compliance with legal requirements, and was providing helpful advice and guidance to the trader. With a few minor exceptions the FSA found Brent staff to be knowledgeable, suitably trained, competent and in the vast majority of cases to be taking appropriate action and keeping necessary records.

3.17.5   In respect of **complaints from the public about food products or hygiene practices by traders**, the audit found that in all but one case, that public referrals were thoroughly investigated, with comprehensive records made of the progress of the investigations.

3.17.6   Brent had produced a **sampling policy** and local sampling plan had been drafted for 2014/15. This plan included a programme for the random and targeted purchase of food across the borough, for examination of food labels and laboratory testing for microbiological safety and compositional standards and chemical safety. The FSA found that the plan was targeted and appropriate to the type of the businesses in the borough. Sampling officers had promptly made the trader aware of sampling results with a helpful advisory letter and a copy of the results was provided to the trader in all cases.

3.17.7   Files were examined by the FSA for a wide range of **enforcement actions** including hygiene improvement notices, seizures, detentions, voluntary closures, hygiene emergency prohibitions and prosecutions. From file checks carried out it was noted generally these enforcement actions had been an appropriate course of action. Auditors noted and questioned that very little enforcement action had been taken during 2014 compared to previous years and there was discussion about case reviews and a backlog and delay of prosecutions.

3.17.8   Ad-hoc day-to-day **internal monitoring** was undertaken for officer food safety activities but this was not generally recorded. Auditors discussed the importance of internal monitoring checks to ensure compliance with official guidance and the Authority's own procedures as well as ensuring consistency between officers.

Key improvements sought

3.18   The primary area for improvement sought by the FSA were the level of resourcing to undertake Food Safety inspections and interventions, follow-up enforcement and internal monitoring. Detailed comparative data was sought, but not obtained from the FSA. The limited data that was able to be secured from the FSA showed that each Brent food officer had around double the number of premises on caseload in comparison with colleagues working in averagely resourced authorities. Whilst the number of staff deployed to food safety work was unusually low in 2012/13 due to vacancies at that time, the current ratio at around 425 premises per FTE deployed on food safety is still about 15% worse that the UK average of 374 premises per FTE, whilst Brent has a higher proportion that the UK average for higher risk premises such as manufacturers, importers/exporters and packers.

3.19   The concerns about a reduction in enforcement actions, were a function of limited staff time and also the increasing demands for enforcement at a fast-growing number of non-compliant shisha cafés.

3.20   The concerns about internal monitoring are primarily arose through the removal of resources for administrative aspects of internal monitoring as a consequence of the centralisation of staff that undertook this work.

Action plan

3.21   The authority's action plan was published simultaneously with the FSA's final audit report on 19 January 2015 and is at Annex A of that report[3]. The FSA have informed the council that they will undertake a follow-up visit on 18 August to review progress in addressing the concerns set out in their January 2015 audit report. The action plan together with Officer's assessment of progress as of July 2015 at Appendix 1 of this report.

Staffing

3.22   The team is currently comprised of seven Environmental Health Officers, a Team Leader and a Regulatory Service Manager. At the time of the report, three of the nine posts were vacant.

3.23   However this resource is also deployed on work other than food hygiene. The team also undertakes food standards, communicable disease and special treatment licensing work. It is estimated that this other work accounts for around 2 FTEs. Thus 5 of the 7 front line posts are deployed on food hygiene work.

3.24   An analysis of resources required to fulfil the expectations of the FLCoP, showed that a team comprising 7 professional and no technical staff was not the best approach, and that we should establish a team with a better balance of skills that corresponds with the balance of risks arising from Brent's food businesses.

3.25   Since the audit management have used the opportunity presented by a variety of staff vacancies, to start rebalancing the team. The team is now made up of 4 professional and 3 technical posts. Two new staff have been recruited since the audit, however a secondment, and recent resignation mean the team is currently carrying three vacancies which are currently subject to recruitment.

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[3] https://www.food.gov.uk/enforcement/auditandmonitoring/2014/auditreports/brent-london/brent-london-delivery-and-compliance-audit

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3.26   Additionally, since the audit the team has moved from taking an 'everyone-does-everything' approach, to having two distinct teams:

- a **low-risk team** made up of technical staff, that oversees the c.80% of food businesses that require less frequent inspection, are almost all in broad compliance with the law, and present the least complexity. This team also deals with other areas of straightforward work, including Health Certification, food sampling and public complaints of poor hygiene or standards; and

- a **high-risk team** made up of professional staff, that oversees the c.20% of food businesses that require more frequent inspection, include almost all businesses that are not in broad compliance with the law, and present the greatest complexity. This team also deals with emergency closures, seizures and complex areas of enforcement. Whilst the majority of closures, seizures etc. arise in high risk premises, and that arise in low risk premises must legally also be undertaken by the officers in this team with higher levels of competency.

This new two-team approach and use of a more comprehensive set of internal performance measures, is already starting to improve staff productivity and contribute to reducing the number of highest risk and lowest compliance food businesses.

3.27   Detailed analysis of the FSA's required number of interventions each year based on Brent's current food business population, with an assumption of increased staff productivity, indicate the following additional resource requirement:

- 1½ FTE additional Environmental Health Officers (or 'Higher' qualified inspectors);

- 3½ FTE additional Technical Officers (or 'Ordinary' qualified inspectors);

- ½ FTE additional unqualified officer to undertake internal monitoring work.

3.28   A report to Cabinet[4] on 16 March 2015 seeking approval for the 2015/16 Food Service plan, resulted in Cabinet noting:

- the conclusions of the Food Standards Agency's audit; and
- action which has been taken to date and endorses the action plan.

Cabinet were also provided with information about the likely extent of resource shortfall and possible costs. It should however be noted that the estimates in this report are more accurate.

Cabinet were informed of the then forthcoming Regulatory Service Review that was planned to consider statutory requirements for regulatory services (including food); scope for efficiency; scope for shared services; scope for income generation; and scope for out-sourcing, mutuals, cooperatives or other delivery models.

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[4] http://democracy.brent.gov.uk/ieListDocuments.aspx?CId=455&MId=2566

Regulatory Services encompasses the following functions:

- Animal Welfare
- Food Safety
- Environmental Monitoring
- Health and Safety
- Health Checks
- Licensing
- Nuisance Control
- Pest Control
- Public Mortuary (Brent, Harrow & Barnet)
- Public Safety
- Sanitary Health
- Stop Smoking
- Trading Standards (Brent & Harrow)

The report advised that Members will be better placed to make decisions about levels of food law enforcement in the context of decisions about other areas of regulation arising from the Regulatory Service Review.

Current position

3.29   At the time of the audit, there was a backlog of 1,736 inspections – around three-quarters of food businesses in Brent. There were also backlogs of enforcement work, prosecution cases, new registered premises awaiting risk-assessment and customer referrals.

3.30   In addition to an increased level of inspection by the in house team, arising from newly recruited staff and increased productivity levels delivered by the two-team approach, underspends from other areas of service have been used to procure temporary external inspections from a contractor. As a consequence, the backlog had been reduced on 17 July 2015 to:

- 259 overdue inspections
- 127 unrated premises; and
- 196 service requests.

3.31   As a proportion of Brent's food businesses, this represents a very dramatic reduction in the proportion of premises overdue for inspection from 67.9% to just 12.4% from July 2014 to July 2015. The service has sufficient funds in reserve to continue the use of temporary additional contractors to clear the backlog in its entirety, which is likely to happen later in 2015.

3.32   The findings from the Regulatory Services Review have identified opportunities for efficiency-making and areas of potential service reduction that can be implemented whilst still enabling the council to meet all statutory duties. Managers are currently developing proposals for consultation that will propose a nett reduction in the overall cost of providing Regulatory Service of £100k per annum from 2015/16 and a further £200k per annum from 2016/17. Officers are seeking to use this as an opportunity to incorporate proposals that will boost available resources for food law compliance, although this will come at the cost of more challenging service reductions in functions delivered by Regulatory Services.

4.0   FINANCIAL IMPLICATIONS

4.1   The real-terms cash limit for Regulatory Services is planned to reduce, as follows:

- 2015/16 - £100k
- 2016/17 - £200k

5.0   LEGAL IMPLICATIONS

5.1   Local Authorities have statutory duties to enforce legislation relating to food, including the primary production of food. The purpose of enforcement is to ensure compliance with legislation relating to food in each Food Authority's area.

5.2   A Code of Practice[5] issued under section 40 of the Food Safety Act 1990, regulation 26 of the Food Safety and Hygiene (England) Regulations 2013, and regulation 6 of the Official Feed and Food Controls (England) Regulations 2009, gives guidance as to how the statutory duty should be discharged and local authorities are required to have regard to this Code.

5.3   Local authorities that do not have regard to relevant provisions of this Code may find their decisions or actions successfully challenged, and evidence gathered during a criminal investigation being ruled inadmissible by a court. In addition, the Food Standards Agency may, after consulting the Secretary of State, give a Food Authority a direction requiring them to take any specified steps in order to comply with this Code.

6.0   DIVERSITY IMPLICATIONS

6.1   There are no staffing diversity implications. Of the staff in post the team has a marginally higher proportion of females than males and slightly higher proportion of BAME staff than white staff.

6.2   It is not currently possible to determine whether the compliance regime, or lower than required levels of intervention, disproportionately affect consumers with different protected characteristics.

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[5] http://www.food.gov.uk/enforcement/codes-of-practice/food-law-code-of-practice-2015

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7.0 STAFFING / ACCOMMODATION IMPLICATIONS

7.1   A likely outcome of the need to reduce the nett expenditure on Regulatory Services is likely to involve a reduction in the number of staff employed across the service, even if the number of staff employed to work on food increases. The Civic Centre is able to accommodate the likely changes in staff.

8.0 BACKGROUND PAPERS

Food Safety Act code of practice - http://www.food.gov.uk/enforcement/enforcework/food-law/

Food Standards Authority audit findings report.

Cabinet report 16 March 2015

9.0 CONTACT OFFICERS

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Appendix A – Brent action plan submitted to the Food Standards Agency and a R/A/G rated progress update as of July 2015

TO ADDRESS (RECOMMENDATION INCLUDED STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
3.1.5(i) Ensure future **Service Plans** are in full accordance with the Service Planning Guidance in the Framework Agreement, to include details of the proposed food premises intervention programme including overdue and unrated establishments for the year, and a clear comparison of resources required to carry out the full range of statutory food law enforcement activities compared to those actually available. [The Standard – 3.1]	31 Mar 15	Completely rewrite the Regulatory Services' Food Safety Service Plan ready for the 2015/16 municipal year to include a detailed food premises intervention programme including overdue and unrated establishments for the year, and a clear comparison of staff resources required to carry out the full range of statutory food law enforcement activities compared to those actually available. Develop options for funding any increases in staffing identified as necessary and ensure these are considered as part of the Council's **2015/16 budget processes.** The service plan will be put forward for Members Approval by **end March 2015**	**RATED GREEN** The 2015-16 Food Safety Service Plan was drafted in accordance with the Framework Agreement and agreed by Cabinet at their meeting on 16th March 2015
3.1.5(ii) Ensure that **a full documented review** is carried out at least once a year based on the service delivery plan and submitted for approval to the relevant Member forum or, where delegated, to relevant senior officers. Any variance in meeting the Plan should be addressed in the following year's Plan. [The Standard – 3.2 and 3.3]	31 Mar 15	The importance of a review is understood. Future Food Service plans will include a review of the previous year's activity and will be submitted to Members for approval each municipal year.	**RATED GREEN** The 2015-16 Food Safety Service Plan includes 2 review dates - a review in **April** to review the previous year's performance and a further review in **September** to check progress, in preparation for putting together a service plan for Cabinet Approval for the following municipal year.
3.1.5(iii) Ensure that the Service has a **sufficient number of suitably qualified, experienced and competent officers** to carry out the work set out in the Food Service Plan. [The Standard – 5.3]	31 Jun 15	Review staff resources required to carry out the full range of statutory food law enforcement as detailed in the Service Plan by **31st March 2015**. Seek political agreement as to the priority to be given to an increase in food law resources and appropriate adjustments to resources by **31st March 2015**	**RATED RED** An internal appointment was made to the vacant Regulatory Team Leader position January 2015. Two Food Safety Officers were also recruited to vacant positions one commenced January

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TO ADDRESS (RECOMMENDATION INCLUDED STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
		Undertake any necessary new recruitment or structural changes if Members agree to provide additional resources from 2015/16 onwards, by **30 Jun 2015.**	2015, the second in March 2015. Agency staff are also being used whilst waiting to appoint to the vacancy created by the internal appointment to Regulatory Team Leader. Reference to the internal review of future resources for Regulatory Services was identified to Cabinet when the Food Services Plan was considered. Review is scheduled for Autumn 2015.
3.1.8 Ensure that all documented **policies and procedures are reviewed at regular intervals** and whenever there are changes to legislation or centrally issued guidance. [The Standard - 4.1]	31 Mar 15	All policies and procedures will be reviewed and revised to ensure compliance with FLCoP and to facilitate improved operational standards and consistency. The Document Control Procedure is being improved to ensure policies and procedures will be kept up to date with changes in legislation or guidance in the future.	**RATED GREEN** All key policies and procedures have been reviewed and plans put in place for revision where necessary. Key ones are mentioned specifically in other parts of this report.
3.1.13(i) Further develop the documented **procedure for the authorisation of officers** to include assessment of officer competence and training needs in accordance with the Food Law Code of Practice (FLCoP). [The Standard - 5.1]	31 Mar 15	The authorisation of officers procedure shall be reviewed and updated as part of the review of policies, procedures and operational standards (as above).	**RATED GREEN** The Authorisation procedure has been revised together with the Management Scheme which supports it and a new section on induction/training/CPD matrix has also been introduced to record competency of authorised officers.
3.1.13(ii) Ensure that all authorised **officers receive training needed** to be competent to deliver the technical and administrative aspects, for the work in which they are involved, including training in specialist processes, inspection of approved establishments, enforcement training, and IT training, where applicable. [The Standard – 5.4]	31 Mar 15	Ensure all CPD records are brought up to date forthwith. Review training around technical areas identified in the audit report. Continue to review training needs during appraisal review and 121 meetings. Training needs assessment scheduled for **January/February 2015**	**RATED GREEN** The Management Scheme referred includes the training plans and competency summary for each officer. In addition, each officer now has a specific file location to store secure copies of CPD certificates and training evidence. This will be reviewed by Team Mangers as part of the Appraisal process.

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3.2.7 Develop, maintain and implement a documented procedure to ensure that the **food premises database is accurate**, reliable and up to date, can be easily interrogated and that reports can be easily and reliably run for the effective delivery, management and monitoring of the food service. [The Standard – 11.2]	31 Mar 15	Review and update property database management and collection of performance monitoring data procedures including updating crystal reports that are used to capture performance data. Analysis of options for future monitoring reports and support of data integrity is being undertaken and will be implemented once agreed. **December 2014** Where the development of these reports is beyond the capacity or skills of the in – house resources, these will be commissioned externally. **January 2015**	**RATED RED** A new approach to internally monitoring performance has been implemented. However, meeting the FSA's expectations is not possible as the resource that undertook non-professional internal monitoring no longer exists.
3.3.15(i) Carry out food hygiene **interventions/inspections at a frequency** which is not less than that determined by the Food Law Code of Practice. [The Standard – 7.1]	30 Jun 15	The key issue is the identification, agreement to and recruitment of additional resources as described at 3.1.5 (iii) above. This will be completed by **31st March 2015** The priority given to performance monitoring has increased. The data collected will be assessed expediently to ensure any deviance from the FLCoP and the intervention plan once developed, will be identified and acted upon early. We additionally plan to completely review internal arrangements for performance monitoring to give greater transparency to any slippage from the FLCoP, by **31 December 2014.** Advertise to recruit existing vacant posts by **31 December 2014.** Recruit additional temporary agency/ contracted inspectors by **31 December 2014.** Any increase in permanent staffing, will result in recruitment, which if successful, will provide additional permanent employees by **30 June 2015**	**RATED RED** Overdue inspections were prioritised and targeted in risk category and overdue date order. This enabled calculations to be made showing anticipated staffing shortfalls which informed the 2015/16 Food Safety Service Plan. In order to carry out the interventions referred to in this recommendation, it will be necessary to increase inspection and intervention resources. The majority if not all of the backlog overdue inspections have been cleared by using in-year under-spends in other areas of service.
3.3.15(ii) Carry out interventions and inspections and approve relevant establishments in accordance with	30 Jun 15	Previously good arrangements for internal monitoring were compromised by reductions in managerial capacity and support capacity.	**RATED RED** Data integrity procedures have been updated,

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relevant legislation and centrally issued guidance. [The Standard - 7.2]		The Document Control Procedure is being reviewed to ensure policies and procedures will be kept up to date with changes in legislation or guidance in the future. **December 2014** A data control procedure is also being developed to ensure close monitoring of data inputs and ensure early warnings of any issues threatening data integrity. **December 2014** The recruitment to the vacant Regulatory Team Leader post will restore part of the internal monitoring capacity **April 2015** The remaining absent internal monitoring capacity will be reviewed as part of the 2015/16 Food safety service plan. **30 June 2015**	however, meeting the FSA's expectations is not possible as the resource that undertook non-professional internal monitoring no longer exists.
3.3.15(iii) Assess the compliance of establishments and systems including those in approved establishments to legally prescribed standards and take appropriate and timely action on any non-compliance found in accordance with the Authority's enforcement policy. [The Standard – 7.3]	30 Jun 15	Review and update all approved premises records and address any non-conformities. Review inspection regularity of all such premises, giving priority to any overdue premises for re-inspection. This is a resource dependent action, and the intermediate milestones are: Advertise permanent Regulatory Team Leader vacancy by **31 December 2014.** Subject to successful recruitment, a new Regulatory Team Leader to have started work **by April 2015.** Regulatory Team Leader to complete required assessment by **30 June 2015**	**RATED GREEN** Approved premises records are regularly updated and the FSA is notified of any changes identified. Integrity of this system is now ensured through improved data integrity checks and procedures undertaken by the since recruited Regulatory Team Leader post.
3.3.15(iv) Review, update and implement **the procedures for interventions and inspections at general and approved establishments** in accordance with the	31 Mar 15	Review and update procedures for approved premises interventions to include withdrawal/surrender, RAN and E coli guidance.	**RATED GREEN** All food policies and procedures have been reviewed and updated.

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FLCoP and practice guidance. [The Standard – 7.4]		To aid consistency and ensure compliance with FLCoP the existing checklist and post inspection report will be reviewed and revised. **November 2014**	Key food policies and procedures have all been reviewed and updated incorporating the changes introduced in the revised FSA FLCoP.
3.3.15(v) Ensure that **information obtained during interventions is stored in such a way that it can be easily retrieved**. [The Standard – 7.5]	30 Jun 15	Review and update the manner in which premises records are held in the property database. Upgrade of back-office database being considered to simplify system arrangements. This relates to concerns about three separate systems being used. A review of the back-office systems is planned to consider scope for simplifying arrangements. This is expected to reach a conclusion by **31 March 2015** Subject to the findings of the above review, it is proposed to establish a system improvement project by **30 June 2015**	**RATED AMBER** Arrangements for the internal monitoring of data and performance have been completely overhauled. The electronic Document Management System has been upgraded and replaced. However a dated browser-based interface that is used to retrieve some records is not expected to be replaced for some months due to project implementation capacity issues.
3.4.10(i) Review and update the Authority's **documented enforcement policy** which should be approved by the appropriate Member forum or relevant senior officer. [The Standard – 15.1]	31 Mar 15	Review and update Council's Enforcement Policy. Present to future Cabinet for approval. By **31st March 2015**	**RATED AMBER** Since the audit, two redrafts of the enforcement policy have been completed, although progress was earlier delayed by sickness within legal services. Work across all council regulatory teams is now needed prior to an updated corporate enforcement policy being presented to Members for consideration and possibly approval.
3.4.10(ii) Develop, **review, update and implement documented enforcement procedures** for all food enforcement activities including prosecutions, simple cautions, voluntary surrenders and closures, hygiene improvement notices and remedial action notices. [The Standard – 15.2]	31 Dec 14	Review and update enforcement procedures and operational standards including all those specifically mentioned in the audit report. Review arrangements for routinely and regularly reviewing such documents, including the resources necessary to undertake this work.	**RATED GREEN** The enforcement policies and procedures for food safety and food standards have all been reviewed and updated and reflected in the Food Service Plan and Intervention Plan.

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3.4.10(iii) Carry out **timely food law enforcement** in accordance with the Food Law Code of Practice	31 Mar 15	Monitor and audit enforcement actions including prosecution reviews. Identify and forward warning letters, simple cautions or prosecution files to legal services. The procedure to improve actions for the future has been identified in the timetable for review; enforcement procedure and data control procedures in particular are relevant here.	**RATED GREEN** All past food safety enforcement cases have been reviewed and actioned. The recruitment of a Regulatory Team Leader should mean that backlogs of enforcement cases for review, should not happen in future.
3.5.6(i) Review, expand **and implement the documented internal monitoring procedures** to also include qualitative and quantitative monitoring of the database, interventions, enforcement actions and food law activities to ensure compliance with official guidance, the Standard, the Authority's own *documented policies and procedures and consistency of enforcement between officers.* *[The Standard – 19.1]*	30 Jun 15	Review and update internal monitoring procedures to include qualitative and quantitative monitoring of the database, interventions, enforcement actions and food law activities. Proposals for resourcing qualitative internal monitoring have commenced and will be reviewed as part of a wider range of requirements that depend on increases in staffing and will be considered as part of the 2015/16 Food Safety Service Plan which is going to Members in **March 2015** The intermediate milestones for resourcing internal auditing requirements are: 31 March 2015 – Food Service Plan agreed by Members 30 June 2015 recruitment of any additional posts funded.	**RATED AMBER** The recruitment and appointment of Regulatory Team Leader will provide capacity for internal audits of professional standards for inspectors. However, the resource that undertook non-professional internal monitoring no longer exists.
3.5.6(ii) Maintain records of internal monitoring for at least two years. [The Standard – 19.3]	31 Mar 15	Records will be kept for two years as specified.	**RATED GREEN** Records are now kept for a minimum of 2 years as required.
3.5.12 Take appropriate action in accordance with its enforcement policy once reviewed, where sample results are not considered to be satisfactory. [The Standard – 12.7]	30 June 15	Monitor and audit sampling results to ensure appropriate action taken for unsatisfactory sampling results. Previously good arrangements for internal monitoring were compromised by reductions in managerial capacity and support capacity. It is planned to re-establish a new internal monitoring regime, supported by restoring the support capacity that has been lost and recruiting to a vacant managerial post. This will be subject to the same intermediate dates.	**RATED GREEN** This relates to just one sample for which full follow-up was not carried out, with all other samples being fully followed-up satisfactorily All Enforcement Officers have been retrained.

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3.5.15 Maintain records in retrievable form for all food establishments and related food law enforcement activities in accordance with the Food Law Code of Practice. Records for individual establishments should be easily linked to enable easy retrieval and provide a complete history of food law enforcement activity. [The Standard – 16.1]	31 Dec 15	Review and update the manner in which premises records is held in the property database. Review reports to retrieve premises records. Explore and adopt IDOX Enterprise for storing premises records. This will be subject to the same intermediate dates as 3.1.5(v) above.	**RATED AMBER** Arrangements for the internal monitoring of data and performance have been completely overhauled. The electronic Document Management System has been upgraded and replaced. However a dated browser-based interface that is used to retrieve some records is not expected to be replaced for some months due to project implementation capacity issues.