



SUMMONS TO ATTEND COUNCIL MEETING

Wednesday 19 February 2020 at 6.00 pm

Conference Hall - Brent Civic Centre, Engineers Way,
Wembley, HA9 0FJ

To the Mayor and Councillors of the London Borough of Brent and to each and every one of them.

I hereby summon you to attend the MEETING OF THE COUNCIL of this Borough.

CAROLYN DOWNS
Chief Executive

Dated: 11 February 2020

For further information contact: James Kinsella, Governance Manager, Tel: 020 8937 2063; Email: james.kinsella@brent.gov.uk

For electronic copies of minutes, reports and agendas, and to be alerted when the minutes of this meeting have been published visit:
democracy.brent.gov.uk

The press and public are welcome to attend this meeting

Please note this meeting will be filmed for live broadcast on the Council's website. By entering the meeting room you will be deemed to have consented to the possibility of being filmed and to the possible use of those images and sound recordings for webcasting.

Notes for Members - Declarations of Interest:

If a Member is aware they have a Disclosable Pecuniary Interest* in an item of business, they must declare its existence and nature at the start of the meeting or when it becomes apparent and must leave the room without participating in discussion of the item.

If a Member is aware they have a Personal Interest** in an item of business, they must declare its existence and nature at the start of the meeting or when it becomes apparent.

If the Personal Interest is also a Prejudicial Interest (i.e. it affects a financial position or relates to determining of any approval, consent, licence, permission, or registration) then (unless an exception at 14(2) of the Members Code applies), after disclosing the interest to the meeting the Member must leave the room without participating in discussion of the item, except that they may first make representations, answer questions or give evidence relating to the matter, provided that the public are allowed to attend the meeting for those purposes.

***Disclosable Pecuniary Interests:**

- (a) **Employment, etc.** - Any employment, office, trade, profession or vocation carried on for profit gain.
- (b) **Sponsorship** - Any payment or other financial benefit in respect expenses in carrying out duties as a member, or of election; including from a trade union.
- (c) **Contracts** - Any current contract for goods, services or works, between the Councillors or their partner (or a body in which one has a beneficial interest) and the council.
- (d) **Land** - Any beneficial interest in land which is within the council's area.
- (e) **Licences** - Any licence to occupy land in the council's area for a month or longer.
- (f) **Corporate tenancies** - Any tenancy between the council and a body in which the Councillor or their partner have a beneficial interest.
- (g) **Securities** - Any beneficial interest in securities of a body which has a place of business or land in the council's area, if the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body or of any one class of its issued share capital.

****Personal Interests:**

The business relates to or affects:

- (a) Anybody of which you are a member or in a position of general control or management, and:
 - To which you are appointed by the council;
 - which exercises functions of a public nature;
 - which is directed is to charitable purposes;
 - whose principal purposes include the influence of public opinion or policy (including a political party of trade union).
- (b) The interests a of a person from whom you have received gifts or hospitality of at least £50 as a member in the municipal year;

or

A decision in relation to that business might reasonably be regarded as affecting, to a greater extent than the majority of other council tax payers, ratepayers or inhabitants of the electoral ward affected by the decision, the well-being or financial position of:

- You yourself;
- a member of your family or your friend or any person with whom you have a close association or any person or body who employs or has appointed any of these or in whom they have a beneficial interest in a class of securities exceeding the nominal value of £25,000, or any firm in which they are a partner, or any company of which they are a director
- any body of a type described in (a) above

Agenda

1 Apologies for Absence

2 Minutes of the Previous Meeting

1 - 16

To confirm as a correct record, the attached minutes of the previous meeting of the Council held on Monday 25 November 2019.

3 Declarations of Interest

Members are invited to declare at this stage of the meeting, the nature and existence of any relevant disclosable pecuniary or personal interests in the items on this agenda and to specify the item(s) to which they relate.

4 Mayor's Announcements (including any petitions received)

To receive any announcements from the Mayor.

5 Appointments to Committees and Outside Bodies and Appointment of Chairs/Vice Chairs (if any)

To agree any appointments to Committees, Joint Committees, Forums, Panels and Outside Bodies (if any); and the appointments of Chairs/Vice Chairs (if any) in accordance with Standing Order 30(g).

6 Budget and Council Tax 2020/21

17 - 570

The purpose of this report is to set out the Council's budget proposals for 2020/21 and business plans for 2021/22 and 2022/23. The report also sets out the results of the consultation, scrutiny and equalities processes. Alongside the overall financial position facing the Council for the medium term and highlights the significant risks and issues.

Members are asked to note that the recommendations in the report were approved by Cabinet on 10 February 2020 for reference on to Council.

Ward Affected: All Wards

Contact Officer: Ravinder Jassar,
Head of Finance
Tel: 020 8937 1487
Ravinder.jassar@brent.gov.uk

7 Result of local by-elections: Alperton, Barnhill & Wembley Central Wards

571 - 572

To note the outcome of the three local by-elections held in the Alperton,

8 Representation of Political Groups on Committees 573 - 580

This report details the outcome of a review of the representation of different political groups on committees following the change in political balance on the Council as a result of the three Council by-elections held in the Alperton, Barnhill and Wembley Central wards on 23 January 2020.

Ward Affected: All Wards **Contact Officer:** James Kinsella,
Governance Manager
Tel: 020 8937 2063
James.kinsella@brent.gov.uk

9 Submission of Draft Brent Local Plan for Examination 581 - 1400

This report sets out for consideration the representations received on the draft Brent Local Plan. The report also seeks approval for its submission for Examination by a Planning Inspector appointed by the Secretary of State and delegation to the Strategic Director Regeneration and Environment, in association with the Cabinet Member for Regeneration, Property and Planning, of authority to approve modifications required to the draft Local Plan.

Ward Affected: All Wards **Contact Officer:** Paul Lewin, Teal
Leader, Planning Policy
Tel: 020 8937 6710
paul.lewin@brent.gov.uk

10 Members Allowance Scheme - Annual Review 1401 - 1406

The report outlines the annual review of the Members Allowance Scheme and seeks approval on the allowances Members will be entitled to receive for carrying out their responsibilities during 2020/21.

Ward Affected: All Wards **Contact Officer:** James Kinsella,
Governance Manager
Tel: 020 8937 2063
James.kinsella@brent.gov.uk

11 Changes to the Constitution 1407 - 1410

This report informs Council of a number of small changes to the Council's Constitution.

Ward Affected: All Wards **Contact Officer:** Debra Norman,
Director of Legal, HR, Audit &

Investigations
Tel: 020 8937 1578
Debra.norman@brent.gov.uk

12 Urgent Business

At the discretion of the Mayor to consider any urgent business, in accordance with Standing Order 30(s).



Please remember to switch your mobile phone to silent during the meeting.

- The meeting room is accessible by lift and seats will be provided for members of the public.

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LONDON BOROUGH OF BRENT

Minutes of the ORDINARY MEETING OF THE COUNCIL held on Monday 25
November 2019 at 6.00 pm

PRESENT:

The Worshipful the Mayor
Councillor Ernest Ezeajughi

The Deputy Mayor
Councillor Lia Colacicco

COUNCILLORS:

Aden	Afzal
Agha	Ahmed
Allie	M Butt
S Butt	Chan
Chappell	Chohan
S Choudhary	A Choudry
Colwill	Daly
Dar	Denselow
Dixon	Donnelly-Jackson
Ethapemi	Farah
Gbajumo	Gill
Hector	Hirani
Hylton	Johnson
Kabir	Kansagra
Kelcher	Kennelly
Knight	Lo
Long	Mahmood
Marquis	Mashari
Maurice	McLennan
Miller	J Mitchell Murray
W Mitchell Murray	Naheerathan
Nerva	M Patel
Patterson	Perrin
Sangani	Shahzad
Ketan Sheth	Krupa Sheth
Southwood	Stephens
Tatler	

1. **Apologies for Absence**

The Mayor advised that direct apologies for absence had been received from Councillors Abdirazak, Conneely, Crane & Thakkar.

2. **Minutes of the Previous Meeting**

RESOLVED that the minutes of the Council meeting held on Monday 16 September 2019 be approved as a correct record.

3. **Declarations of Interest**

No interests were declared by Members at the meeting.

4. **Mayor's Announcements (including any petitions received)**

Before starting his announcements, the Mayor invited Carolyn Downs (Chief Executive) to make a short statement who advised Members she had been informed, that morning, of Councillor Pavey's intention to resign as a councillor in Barnhill ward for personal reasons.

As the Council's Returning Officer, she informed members that she intended to publish Notice of the Vacancy on the 26 November 2019. Subject to a formal request being received, it was anticipated that the resulting by-election would be held in late January 2020. Members were asked to join the Chief Executive in wishing Councillor Pavey well for the future and in recognising his contribution to the Council since his election in 2012, not only as a local councillor for Barnhill ward but also during his time as Lead Member for Children's Services and Deputy Leader

Councillor Shafique Choudhary took the opportunity to pay tribute to Councillor Pavey, as a fellow councillor for Barnhill ward. Highlighting how closely he had worked with Councillor Pavey, he was keen to recognise his integrity and focus in supporting local residents and advised how much he would be missed as both a friend and valued colleague.

Following a short round of applause in tribute to Councillor Pavey, the Mayor then moved on to make the following announcements:

(i) Nigerian Independence – Flag Raising Event

The Mayor was pleased to begin his announcements by advising of the successful flag raising event held on the 1 October to celebrate Nigerian Independence Day and thanked all those who had attended.

(ii) World Mental Health Day

The Mayor also took the opportunity to thank Councillor Colacicco (as Deputy Mayor) for attending the World Mental Health Day event in his absence.

(iii) Black History Month

The Mayor advised that he had been pleased to join the celebrations for Black History Month in October, which had included numerous school and other events in the borough. Amongst the events attended had been the Black History Month celebration at the Civic Centre, which had been a huge success.

(iv) Hindu New Year

Advising what an honour it had been, the Mayor informed Members that he had attended BAPS Shri Swaminarayan Mandir to celebrate the Hindu New Year and had also been pleased to attend Diwali celebrations at the Civic Centre, alongside the Chief Executive, Council staff and representatives of the temple.

(v) Remembrance Day Commemoration Events

The Mayor advised he had also been honoured to attend the Borough Remembrance Sunday Service at Barham Park in order to commemorate all those who had lost their lives in conflicts throughout the world. Commenting on how well attended the service had been, the Mayor advised that it had been humbling to see so many turn out to pay tribute. A service had also been held at the Civic Centre the following morning, which included local children from Park Lane Primary School reading some poetry led by the War Horse Theatre Production.

(vi) Annual Fireworks and Diwali celebrations

The Mayor informed Members that he had also been pleased to host a reception to watch the Wembley Park fireworks, and parade on Sunday 10 November, which had been well attended and enjoyed by all.

(vii) Mayor's Charity Football Tournament

The Mayor advised that he had enjoyed attending a successful football tournament organised jointly with the FA on behalf of his charity at Wembley Stadium. A number of councillors, staff, community groups and the police had participated in the event, which he advised had provided an amazing opportunity to play on the famous Wembley pitch.

(viii) Christmas Lights – Wembley Park

The Mayor reported he was also pleased to have been invited to switch on Winterfest, Wembley Park's first-event lights festival, which included a sonic runway and London's tallest LED Christmas tree.

(ix) Pride of Brent

The Mayor took the opportunity to congratulate all winners at the recent Pride of Brent awards, at which he was honoured to have been able to celebrate and recognise the contribution of staff and residents who made such a massive contribution to the lives of the people of Brent.

(x) 100th Birthday Celebration

The Mayor asked all Members to join him in congratulating Ms Isobel Collis, whom he had recently visited at Kenbrook Nursing Home, Wembley in order to celebrate her 100th birthday.

(xi) White Ribbon Day

The Mayor took the opportunity to remind Members that the 25 November had been designated as White Ribbon Day, which sought to raise awareness and work towards the prevention of violence against women.

As part of the campaign, he reminded Members that Brent would be holding its own event on 26 November 2019 between 10am – 2pm at the Civic Centre, which would include a range of keynote speakers and information stalls and encouraged as many councillors as possible to attend.

(xii) Mayor's Christmas Charity Event

The Mayor ended his announcements by reminding everyone that he would be holding his Festive Christmas Dinner and Dance on Friday 6 December at the Civic Centre, for which tickets were currently on sale.

(xiii) Petitions

Finally, the Mayor drew Members attention to the list of current petitions, along with the action being taken to deal with them, which had been tabled at the meeting, in accordance with Standing Orders.

5. Appointments to Committees and Outside Bodies and Appointment of Chairs/Vice Chairs (if any)

The Mayor referred Members to the supplementary agenda tabled at the meeting, which contained details of the changes to appointments on Council Committees, Sub Committees and other bodies.

RESOLVED that following on from the earlier statement made by the Chief Executive:

- (1) Councillor Pavey be replaced as a full member by a vacancy on the following bodies:
 - (a) Teachers Joint Consultative Committee;
 - (b) Service User Consultative Forum – Voluntary Sector; and
 - (c) Chalkhill Community Trust;
- (2) Councillor Pavey be replaced as a substitute member by a vacancy on the Employees' Joint Consultative Committee.

6. Deputations (if any)

The Mayor advised that no requests for any deputations had been received, so moved straight on to the next item.

7. Questions from Members of the Public & Brent Youth Parliament

The Mayor advised that two questions had been received from members of the public.

Question 1 from Mr M.Brown to Councillor Krupa Sheth, Cabinet Member for Environment, regarding the action being taken by the Council to tackle climate change and ensure the borough was carbon neutral by 2030.

Question 2 from Ms G.Abdulgadir to Councillor Shama Tatler, Cabinet Member for Regeneration, Property & Planning relating to the number of social housing units, tenancy types and rent mix included within the Wembley Park development.

Members noted the written responses to the questions, circulated with the agenda. The Mayor advised that both members of the public had been invited to attend the meeting in order to ask a supplementary question. Whilst Ms Abdulgadir had advised she would not be attending, the Mayor welcomed Mr Brown to the meeting and invited him to put his supplementary question to Councillor Krupa Sheth, as Cabinet Member for Environment.

Supplementary Question from Mr Brown to Councillor Krupa Sheth, Cabinet Member for Environment

Having thanked Councillor Sheth for the written response provided, Mr Brown asked for further details to be provided in relation to the preservation and management of green space across the borough. Referring to the work being undertaken through the Green Space Commission, he asked for examples of the ideas being fed in to that process along with current action being taken to tackle the climate crisis, including the preservation of trees, in advance of the planned adoption of the borough wide climate change and sustainability strategy in May 2020.

In response, Councillor Krupa Sheth thanked Mr Brown for his supplementary question and began by reassuring him that it was Council policy to seek to preserve trees but where not possible efforts were made to ensure they were replaced. In terms of immediate action being taken to address the climate emergency, Councillor Krupa Sheth highlighted:

- the work being undertaken to develop an Interim Climate & Ecological Emergency Action Plan on which a separate report was due to be considered later during the meeting;
- the establishment of the Brent Climate Assembly and Youth Climate Summit hosted by Brent Youth Parliament; and
- development of the borough-wide climate emergency strategy;

The strategy would be subject to public consultation and she finished by encouraging as many people as possible to take advantage of the opportunities to participate and engage in that process.

Having noted the response provided, the Mayor thanked Mr Brown for his question and for attending the meeting.

Following on from the public question session the Mayor then moved on to deal with the questions received from representatives of Brent Youth Parliament. He advised that the following question had been received from the Youth Parliament:

Question 1 to Councillor Krupa Sheth, Cabinet Member for Environment, regarding progress on implementation of the recommendations agreed at the first Brent Council Climate Change Youth Summit.

Members noted the written response to the question, circulated with the agenda with the Mayor advising that representatives from the Youth Parliament had unfortunately not been able to attend the meeting in order to ask any supplementary question. As there was no supplementary question to be dealt with, the Mayor advised this now concluded the public question session.

8. **Petitions (if any)**

The Mayor advised that no requests for any debates on petitions had been received.

9. **Reports from the Leader and Cabinet**

The Mayor advised Members that the Leaders Update for this meeting would be provided as a verbal report. He then invited Councillor Muhammed Butt, as Leader of the Council, to present his update. Councillor Butt thanked the Mayor for his introduction and provided the following updates in relation to Cabinet portfolios:

- Members were advised of the successful media launch of the London Borough of Culture programme and reminded that the formal launch event would be taking place on Saturday 18 January 2020. Highlighting the importance of this event, the Leader felt this provided a unique opportunity to celebrate and recognise the contribution made by all communities across the borough;
- The outcome of the recent Ofsted inspection at Ark Elvin Academy, which now meant that all Secondary Schools within the borough had been rated by OFSTED as either “Good” or “Outstanding” and highlighted the commitment towards ensuring every child in the borough had the opportunity to succeed;
- The start of the Council’s budget consultation process for 2020-21 & 2021-22;
- The list of urgent Executive decisions taken since the last Council, as tabled at the meeting.

The Mayor thanked Councillor Muhammed Butt for his report and it was **RESOLVED** to formally note the update provided by the Leader of the Council.

10. **Questions from the Opposition and other Non-Cabinet Members**

The Mayor advised that following discussion between both Groups no advance notice questions had been submitted for response at this meeting. In addition, it had been agreed that no issues would be raised during the open question time session. On this basis, the Mayor advised that he would therefore move straight on to the next item.

11. **Report from Chairs of Scrutiny Committees**

Before inviting the Chairs of each Scrutiny Committee to present their reports, the Mayor reminded Members that a total of 12 minutes had been set aside for this item. He drew members attention to the written reports circulated as part of the agenda, which highlighted the key issues arising from the work of each Committee and then invited each Chair to present their update.

Community and Wellbeing Scrutiny Committee

Councillor Ketan Sheth advised that on this occasion he was not intending to add anything further to the written update provided and therefore asked Members to note the report relating to the work of his Committee, as circulated with the agenda.

Resources and Public Realm Committee

Councillor Kelcher advised that in the interest of time he was also not intending to add anything further to the written update provided and therefore asked Members to note the report relating to the work of his Committee, as circulated with the agenda.

The Mayor thanked Councillors Ketan Sheth and Kelcher for the updates provided and it was **RESOLVED** that the content of their reports be noted.

Following the updates provided, the Mayor advised that whilst it would be usual for the remainder of the time available to be open for questions to the Scrutiny Chairs he was aware, following agreement reached between both Groups prior to the meeting, that no questions were due to be raised during the open session of the meeting. As there were no additional questions, the Mayor advised he would move on to the next item.

12. **Report from the Vice-Chair of the Audit Advisory Committee**

The Mayor invited Councillor Aslam Choudry, as Vice Chair of the Audit and Standards Advisory Committee, to introduce his report updating Members on the work of the Committee.

Councillor Choudry advised that as with the previous updates from each Scrutiny Chair, he was not intending to add anything further to his written update and therefore asked Members to note the report relating to the work of the Committee, as circulated with the agenda for the meeting.

The Mayor thanked Councillor Choudry for the update provided and it was **RESOLVED** that the report be noted.

13. Non Cabinet Members' Debate

The Mayor advised that no subject had been identified for debate and therefore moved on to the next item on the agenda.

14. Interim Report on Brent's Response to the Climate and Ecological Emergency

Councillor Krupa Sheth introduced the report from the Strategic Director, Regeneration and Environment, which provided an update on progress with the actions taken in response to the Declaration of a Climate and Ecological Emergency made at the Full Council meeting on 8 July 2019.

As part of her opening comments, Councillor Krupa Sheth highlighted what she regarded as the considerable progress made since the Council meeting in July, which she advised she had been proud to lead given its importance to the borough. In terms of specific actions, reference was made to the completion by the Council of an internal corporate review of its sustainability activity and to the commissioning of the Brent Carbon Scenarios 2030 study. This had been undertaken alongside establishment of the Brent Climate Assembly which had been set up as a means of engaging and building consensus within the local community around the actions being developed in response to the climate emergency.

Turning to the report, Councillor Krupa Sheth advised this set out a pathway for the creation of a 10-year Borough wide Climate Change and Sustainability Strategy. Development of the Strategy would be subject to public consultation (including the organisation of a Green Summit) and review by scrutiny prior to adoption by Cabinet. Whilst the corporate review had confirmed that the Council was already delivering best practice in a number of areas, for example, its award winning green Civic Centre; LED street lighting and emission based parking permits it had also identified gaps where it was felt more could be done. In Councillor Krupa Sheth's view the carbon scenarios study had removed any doubt about the scale of the technological, financial and lifestyle challenges faced. The steps being taken to reduce these risks and tackle climate change would, however, also have the potential to deliver many other positive changes within Brent on significant issues such as cleaner air, greener spaces, warmer homes, healthy travel and a thriving economy. In seeking to deliver a programme of carbon neutral transition, Councillor Krupa Sheth also felt it important to recognise the need for fairness, with the Council committed to providing vulnerable households, people on low incomes and small businesses in Brent with the opportunity to benefit from low carbon and green technologies without suffering financial hardship.

Councillor Krupa Sheth ended by highlighting that the need for immediate action in relation to the climate emergency had also been recognised. As a result the Council had developed an interim Winter 2019/2020 Climate and Ecological Emergency Action Plan which included a set of shorter term priorities and immediate actions in key thematic areas that Members were being asked to consider and approve at the meeting. As a final comment, Councillor Krupa Sheth took the opportunity to thank all residents, officers and councillors for their support to date and encouraged everyone to get involved as the process moved forward.

As no other members indicated they wanted to speak on the report, the Mayor put the recommendations to the vote by a show of hands and they were unanimously declared **CARRIED**.

It was therefore **RESOLVED**

- (1) To approve the Interim Climate & Ecological Emergency Action Plan (Winter 2019-20), attached as Appendix A to the report.
- (2) To approve the development of a borough-wide climate emergency strategy which would be issued for public consultation in the New Year and referred on to Cabinet for adoption in May 2020.

Post Meeting Note:

Members are asked to note the following update to figures within section 5.3 of the original report presented to Council detailing the results of the Brent Carbon Scenarios 2030 Study:

- Scenario 1 - Governmental and Mayoral projections to 2030, based on Government predictions for decarbonisation of the national grid and ambitious Mayoral projections for the uptake of a range of building and transport related carbon reduction measures in Brent by 2030. This scenario is estimated to achieve a 55% carbon reduction by 2030, at a cost of £764 (as opposed to 681) million.
- Scenario 2 - An All Electric (cars and heating), Medium Insulation & Medium Solar PV Scenario, showing an 83% carbon reduction by 2030, at a cost of £2.3 (as opposed to 4.2) billion.
- Scenario 3 - An All Electric (cars and heating), High Insulation & High Solar PV Scenario, showing an 87% carbon reduction by 2030, at a cost of £3.1 (as opposed to 5) billion.
- Scenario 4 - An All Electric (cars and heating), High Insulation & High Solar PV Scenario and Zero Carbon Grid, showing a 100% carbon reduction by 2030, at a cost of £3.1 (as opposed to 5) billion (the additional costs of a zero carbon national grid in Scenario 4 have not been quantified).

15. Local Council Tax Reduction Scheme 2020/21

Councillor Southwood introduced the report from the Strategic Director, Customer and Digital Services seeking approval to the adoption of a new local Council Tax Reduction Scheme.

Councillor Southwood began her introduction by highlighting the vital contribution made by Council Tax in funding key local services provided by the Council, including Adult Social Care. At the same time, however, Councillor Southwood advised she was also aware of the burden Council Tax payments placed on some residents, especially those experiencing severe poverty, with had resulted in the Council providing support through its Council Tax Support Scheme. Members were

advised that the review of the current scheme had been driven by the recent changes to the welfare system, as the scheme had become more complicated and less sustainable to operate, with the report presenting the outcome of that review and changes being proposed as a result.

Highlighting the key changes, Councillor Southwood felt it was important to assure Members that these would not affect pensioners and had been focussed on supporting working age residents identified as less able to pay and those more vulnerable individuals or households, including carers and those with disabilities. The proposals had been subject to a full public consultation process and developed in conjunction with a cross party Working Group of Members. The revised scheme that had been developed as a result was a banded one and met the objective of being simple and fair. The scheme had also been designed to recognise that some households may include non-dependants with a higher level of earning with the Council looking to work with those households affected, in order to understand the changes being proposed.

In developing the scheme, Councillor Southwood advised that the Administration was aware the proposed changes would not deliver the original level of savings identified as part of the previous budget setting process. This had, however, been a conscious decision in order to ensure that the scheme was able to support and protect the most vulnerable residents. She ended by thanking all those involved in developing the revised scheme including officers within the Council's Benefits Team for their efforts and support. Particular thanks were expressed to David Oates, as Head of Customer Services Operations, for his lead on the process with Members also taking the opportunity to wish him well for his forthcoming retirement from the Council.

The Mayor then opened the debate inviting other Members to speak on the report.

Councillor McLennan, speaking as Deputy Leader and Cabinet Member for Resources, also took the opportunity to thank officers for their efforts on the review. Recognising that the proposed changes would not deliver the same level of savings as originally identified, she felt it was more important that the proposals had resulted in a balanced scheme. She also took the opportunity to pay tribute to David Oates for his support and work undertaken when the scheme was first introduced, and on its subsequent revision.

Councillor Choudhary, speaking as a member of the cross party Working group that had assisted with the review, advised that he also wished to thank officers for their efforts and advice in supporting what had been a complex process.

As no further issues were raised and Councillor Southwood had indicated she did not want to exercise her right of reply, the Mayor put the recommendations to the vote by a show of hands and they were unanimously declared **CARRIED**.

It was therefore **RESOLVED**:

- (1) To approve and authorise the making and implementation of the recommended Council Tax Support Scheme as set out in section 4 and Appendix A of the report, to be effective from 1 April 2020.

- (2) To note the outcome of the consultation on proposals to change the Local Council Tax Support scheme, as detailed in Section 6 and Appendices G & H of the report.
- (3) To note the findings on equalities and other impacts arising from the proposed Council Tax Support scheme as set out in sections 5 and 10 of the report.
- (4) To approve the decision not to offer Transitional Protection to existing claimants who are adversely affected by the change to the new scheme, for the reasons set out in Section 5 of the report
- (5) To note alternative scheme options that existed and the reasons for these options being discarded.
- (6) To note the draft plan of implementation activities scheduled between December 2019 and March 2020.

16. Inclusive Growth Strategy 2019-2040

Councillor Tatler introduced the report from the Strategic Director, Regeneration and Environment, which outlined the Council's Inclusive Growth Strategy for 2019-2040.

In introducing the report, Councillor Tatler highlighted the rapid pace of change in relation to regeneration activity within Brent, with the Council keen to ensure that the associated benefits and opportunities provided were not only shared but the significant challenges were also recognised and understood. As a result, the Council had developed an Inclusive Growth Strategy, which had replaced its previous Regeneration Strategy and sought to build on the objective within the Borough Plan to promote longer term and pre-emptive planning around the challenges and opportunities identified.

Members were advised that work to develop the Strategy had involved input from a range of external partners and Council Departments. The Strategy aimed to underpin the key principles that growth should be inclusive and participative and had been designed to compliment the key objectives within the Motion approved at the last Council meeting relating to community wealth building.

Focussing on the content of the Strategy, Councillor Tatler, highlighted the key areas which included culture, economy, education & skills, environment, health & wellbeing, investment and infrastructure and longer term approach identified in order to meet the challenges and seize the opportunities for inclusive growth over the next 20 years. In summing up she also took the opportunity to pay tribute to not only those partners involved but also the officers within Regeneration and Environment involved in leading on development of the strategy. Specific reference was made to Aktar Choudhury, whom she advised had returned to visit the Council specifically for consideration of this item.

As no other members indicated they wanted to speak on the report, Councillor Tatler ended by encouraging everyone to view the online video that had been produced to help residents understand the key themes within the Strategy along with the outcomes being sought and commended the report to Council.

The Mayor then put the recommendations to the vote by a show of hands and they were unanimously declared **CARRIED**.

It was therefore **RESOLVED**:

- (1) To note the Inclusive Growth Strategy 2019-2040.
- (2) To note that the Inclusive Growth Strategy research base, strategy documents and video would be presented to Cabinet for approval prior to publishing the strategy documents on the Council's website, and disseminating the same to key partners and stakeholders.

17. **Revoking a Byelaw to Enable Cycling In Parks and Open Spaces**

Councillor Tatler introduced the report from the Strategic Director, Regeneration and Environment seeking approval, following the outcome of a public consultation process, to the revocation of the byelaw prohibiting cycling in Brent's parks and open spaces. As part of her opening comments, Councillor Tatler felt that the revocation of the byelaw had been long overdue with the Council committed to providing a safe and accessible cycling infrastructure across the Borough that would not only be properly regulated but would also help to promote physical activity and encourage alternative modes of transport. The report had detailed the outcome of the public consultation undertaken in relation to the proposed revocation along with a survey of all parks and open spaces, and outline of the safety measures that would be introduced, including signage and markings. In concluding her opening comments, Councillor Tatler also felt it was important, by way of reassurance, to confirm that the Council would still be able to use its enforcement powers in order to tackle issues involving general nuisance and inconsiderate behaviour by cyclists and on this basis commended the report to Council.

The Mayor then opened the debate inviting other Members to speak on the report.

Whilst highlighting his support for the proposal, Councillor Kelcher sought an assurance on the retention of measures introduced to tackle problems being caused by motorised scooters in a number of parks, including King Edwards and Roundwood, as a result of any infrastructure works required to support the revocation. Whilst seeking to encourage cycling, these measures had included the installation of gates to prevent access by scooters, which he was keen to ensure were retained. As an additional issue relating to the use of parks and open spaces, he also queried whether, alongside revocation of the cycling byelaw, it would be possible to consider overturning the current ban on BBQs.

Councillor Nerva highlighted the logical and innovative nature of the proposal, which he pointed out had been appreciated by cyclists throughout Brent and represented a practical example of how the Council was genuinely seeking to promote cycling as an alternative form of transport and to encourage healthier lifestyles. Following on from the comments made by Councillor Kelcher he also took the opportunity to express his support for the provision of designated space to allow BBQs (on a limited basis) within the boroughs parks and open spaces.

Councillor Maurice, speaking on behalf of the Conservative Group, advised that they also supported the proposed revocation acknowledging the contribution of the associated environmental impacts in relation to cleaner air. Concerns were, however, raised in relation to the enforcement action it would be possible to take in terms of addressing any associated anti-social behaviour or safety issues around aggressive or unsociable cyclists given the shared space and need to avoid harm to other pedestrian park users.

Following on from the issues highlighted by Councillor Maurice, Councillor Colwill also felt there was a need to seek details on the costs associated with any enforcement of the necessary safety measures and policing of the scheme.

As no further issues were raised, Councillor Tatler in exercising her right of reply thanked Members for their support during the debate. In terms of the impact on the measures designed to tackle use of motorised scooters, she advised that detailed implementation plans were being developed in relation to the measures that would be required in each park and open space in terms of the physical infrastructure and signage required, on which further details could be provided in relation to the specific sites identified.

In terms of cost, Members were advised that the existing Neighbourhood Patrols would have responsibility for undertaking any enforcement activity required. A common sense approach would need to be adopted, however, based on current experience given that the aim was to promote cycling, active travel and the use of parks and open spaces across the borough.

As a number of comments had also been raised during the debate on the regulation of BBQs in parks and open spaces the Mayor advised that he would also be willing to provide Councillor Miller, as Cabinet Member for Community Safety and Engagement, with an opportunity to respond.

Thanking the Mayor, Councillor Miller confirmed that it would not be possible to consider overturning the current ban on BBQs within the boroughs parks and open spaces given the clear conflict and fire safety issues in relation to the introduction of meadow areas in these locations. He also supported the comments made by Councillor Tatler in relation to enforcement activity and the role of the Neighbourhood Patrols but felt it was also important to recognise that the proposal Members were being asked to consider involved the revocation of a byelaw rather than the introduction of any new enforcement regulations. As further assurance, he also reminded Members of the existing powers available to enforce regulations under the current borough wide Public Space Protection Order applying to parks and open spaces.

As no further issues were raised the Mayor then put the recommendations to the vote by a show of hands and they were unanimously declared **CARRIED**.

It was therefore **RESOLVED**:

- (1) To approve and make the revocation of byelaw 7ii, in the terms set out in Appendix B of the report.

- (2) To note the process followed by officers to revoke the byelaw following approval from the General Purposes Committee on 19th March 2019.
- (3) To note the outcome of the public consultation conducted from 7 June and 19 July 2019 for revoking byelaw 7ii.

18. **Draft Statement of Licensing Policy**

Councillor Miller introduced the report from the Strategic Director, Regeneration and Environment seeking approval to adoption of the Statement of Licensing Policy and accompanying Cumulative Impact Zones proposed within Brent. He began by thanking the Licensing Team for their work in developing the Policy and the members of the public and other stakeholders who had responded to the consultation. Highlighting the power of local democracy as a means of improving people's quality of life, increasing local community control and social harmony he felt the proposals contained in the Policy were innovative. They would, he pointed out, provide the Licensing Committee with the powers needed to ensure the boroughs high streets were able to continue providing a diverse offer in terms of regulating off-licence provision and would also have a positive impact in terms of public health and in addressing alcohol related anti-social behaviour. Subject to the policy being approved, Members were advised that Brent would become one of the first Local Authorities to adopt a series of Cumulative Impact Zones designed to prevent the growth of off-licenses and encourage applicants to include a voluntary condition relating to minimum pricing for the sale of alcohol in areas where street drinking and alcohol related crime already existed. This could also be used to address issues in relation to the sale of alcohol to underage customers and help shape the market in terms of alcohol sales by encouraging more responsible off-licence holders. The policy had also been designed to favour a more diverse provision from off-license premises and support the provision and development of a more varied night time economy aimed at enhancing leisure and entertainment facilities, subject to the appropriate safeguards and in support of the Mayor for London's and Council's efforts to support the high street and Brent as the 2020 Borough of Culture.

In concluding his opening statement, Councillor Miller highlighted the extent to which the proposals had been welcomed by residents, through the extensive public consultation process and would rebalance power in support of local communities and compliant businesses and bring about practical and real change. On this basis, he commended the Policy and accompanying Cumulative Impact Zones to Members for approval.

The Mayor then opened the debate inviting other Members to speak on the report.

Highlighting his role as a member of the Licensing Committee, Councillor Maurice outlined how the Committee sought to act in as fair and robust a way as possible when exercising their licensing functions. This would involve taking the necessary action to revoke or suspend licenses where applicants had clearly not complied with their licensing requirements or conditions imposed. Concern was, however, expressed regarding the impact and enforcement of the Public Space Protection Orders in place across a number of areas within the borough, designed to tackle street drinking, particularly within the Queensbury and Preston Road areas. Given

the problems caused, Councillor Maurice advised that he would like to see more robust enforcement activity in relation to these areas.

Councillor Kennelly also spoke in support of the Policy but felt further analysis was needed in relation to the impact on Brent's night-time economy, given the area of growth this represented for the economy across the whole of London. Concerns were also highlighted in relation to the impact which the loss of key staff within the Council's Licensing Team would have moving forward and at the enforceability of some aspects of the Policy in relation to the increasing levels of alcohol home delivery services and the use of alcohol in open spaces. Whilst this would require further work with local licenced businesses, he advised he remained supportive of the approach within the Policy.

Councillor Donnelly-Jackson in expressing support for the Policy, also took the opportunity to highlight concerns around the lack of licensing controls on firework displays, given the level of public nuisance these could cause, especially for animal owners.

As a final contribution to the debate, Councillor Mitchell-Murray also took the opportunity to thank the staff within the Licensing Team for their support to the Licensing Committee.

As no further issues were raised, Councillor Miller, in exercising his right of reply echoed the support expressed for staff within the Licensing Team, with specific reference to Yogini Patel for her role in leading the Team and work in developing the Policy Statement. Referring to the issue highlighted in respect of fireworks, he also supported the need for these displays to become licensable activities and highlighted the similar campaign he had been supporting in relation to shisha cafés. In terms of impact on the night-time economy, Councillor Miller advised that he recognised this as an issue but felt it would require further review along with the introduction of the minimum pricing option once the refreshed Policy Statement had been implemented. The support for the Policy Statement expressed by members of the Licensing Committee was also welcomed, but Councillor Miller felt there was a need to address the concerns raised in relation to enforcement of the Public Space Protection Orders to tackle street drinking. Whilst recognising the additional resources now being made available he felt it was important to highlight the impact which the overall budget reductions imposed on the police and other public service as a result of the Government's austerity programme were having in terms of their ability to support this type of enforcement activity. He felt this would continue to be an issue until the funding required by public services was properly addressed by the Government.

The Mayor thanked Councillor Miller for his closing statement and then put the recommendations to the vote by a show of hands and they were unanimously declared **CARRIED**.

It was therefore **RESOLVED**:

- (1) To approve the Statement of Licensing Policy as detailed within Appendix A of the report and Cumulative Impact Zones as detailed within Appendix B of the report.

- (2) To note that the Cumulative Impact zones proposed would need to be reviewed within 3 years.

19. **Motions**

The Mayor advised that following an agreement reached between both Groups, no motions had been submitted for debate at the meeting.

20. **Urgent Business**

The Mayor advised Members there were no urgent items of business for consideration. Before closing the meeting he took the opportunity to wish all those celebrating a Happy Hannukah and, given it was the final Full Council meeting before the Christmas holiday period, to wish all Members a Merry Christmas and Happy New Year.

The meeting was declared closed at 7:08pm.

COUNCILLOR ERNEST EZEAJUGHI
Mayor

 Brent	Full Council 19 February 2020
	Report from the Director of Finance
Budget and Council Tax 2020/21	

Wards Affected:	All
Key or Non-Key Decision:	Key
Open or Part/Fully Exempt: (If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)	Open
No. of Appendices:	21 – see list attached
Background Papers:	None
Contact Officer(s): (Name, Title, Contact Details)	Minesh Patel Director of Finance Email: Minesh.Patel@brent.gov.uk Tel: 020 8937 6528 Daniel Omisore Deputy Director of Finance Email: Daniel.Omisore@brent.gov.uk Tel: 020 8937 3057

1.0 Purpose of the Report

- 1.1 The purpose of this report is to set out the Council's budget proposals for 2020/21 and business plans for 2021/22 and 2022/23. It also sets out the results of the consultation, scrutiny and equalities processes. The report also sets out the overall financial position facing the Council for the medium term and highlights the significant risks, issues and uncertainties.
- 1.2 The Council published an updated draft medium term financial strategy up to 2022/23 on 11 November 2019. This set out the delivery of a balanced budget for 2020/21, which included £7.4m of savings to be delivered in 2020/21 and a Council Tax increase of 3.99%, all of which were extensively consulted upon and agreed at the Full Council meeting of 25 February 2019. It also set out £6.1m of new proposals to balance the budgets of 2021/22 and 2022/23. If all

of these proposals were to be agreed, it is expected that the budgets for 2020/21, 2021/22 and 2022/23 would be balanced. However, the estimates for 2021/22 and 2022/23 are subject to change due to the uncertainty around a longer-term Spending Review and the outcome of other significant planned reforms to Local Government funding, for example the Fair Funding review.

- 1.3 Having considered the various comments made, including through the consultation, scrutiny and equalities processes, officers have been instructed to proceed with the budget proposals as previously set out. These are set out in more detail in the appendices to this report, which are organised as follows:

Appendix C (i)	Summary of 2020/21 budget savings proposals
Appendix C (ii)	Summary of 2021/22 - 2022/23 budget savings proposals
Appendix C (iii)	Detailed budget templates for 2021/22 - 2022/23 proposals

The appendices also include an equalities analysis for each proposal (Appendix C (v)) and a cumulative equalities analysis on the overall budget for the next three years (Appendix C (iv)).

- 1.4 Given the significant financial uncertainties that have been highlighted throughout this process, this is a balanced and proportionate approach to the demanding choices that have to be confronted in budget setting. By adopting a long-term and forward looking approach, the proposals should leave the Council in a relatively strong financial position, with long-term plans in place to give certainty to residents about future levels of service provision.

- 1.5 The budget setting process is designed to ensure that it is priority led so that resources are aligned with Council priorities, as well as the statutory processes of consultation, scrutiny and equality analyses. This includes alignment with the Borough Plan for 2019 – 2023, agreed by Full Council on 25 February 2019, which sets out the Council's commitment to making a real difference to the lives of local people based on a number of key priorities such as:

- **Every opportunity to succeed** – working in partnership to support children and young peoples' educational attainment and training
- **A future built for everyone, an economy fit for all** – regenerating our borough to grow the local economy and provide the jobs, homes and transport that people need
- **A cleaner, more considerate Brent** – improving air quality and keeping our environment clean and pleasant
- **A borough where we can all feel safe, secure, happy and healthy** – building stronger, safer and healthier communities, with opportunities to enjoy Brent's unique cultural heritage, and support for vulnerable children and adults to be as independent as possible
- **Strong foundations** – ensuring that the Council and its partners are structured and equipped to secure the best possible outcomes for local people, within a context of diminishing resources.

- 1.6 Aside from the usual updating of and adjustments to various technical assumptions the key features of this budget are:

- A council tax rise of 3.99% for the Brent element, making a Band D council tax of £1,312.74. Additionally, the Council will levy a council tax currently expected to be £332.07 at Band D on behalf of the Greater London Authority (GLA), which is a 3.61% rise compared to 2019/20 (comprising an additional £10 for the Metropolitan police and £1.56 for the London Fire Brigade). Therefore, the total council tax at Band D is expected to be £1,644.81, an overall 3.91% increase on the 2019/20 level.
- Budget savings proposals (all of which were considered by Council in February 2019) with an aggregate value of £7.4m for 2020/21, as summarised in Appendix C (i).

1.7 This report is structured as follows:

- Officer recommendations for Cabinet and full Council to approve;
- Strategic overview of the financial and macro-economic climate;
- Summary of the process to develop the budget;
- The results of consultation, scrutiny and equalities are set out;
- Updates from the Council's ring fenced budgets, specifically the Housing Revenue Account (HRA) and the Dedicated Schools Grant (DSG); and
- The capital programme is set out, along with the associated pipeline of schemes, capital strategy, investment strategy and treasury management strategy.

2.0 Recommendation(s)

Cabinet

- 2.1 Agree to recommend to full Council an overall 3.99% increase in the Council's element of council tax for 2020/21, with 2% as a precept for Adult Social Care and a 1.99% general increase.
- 2.2 Agree to recommend to full Council the General Fund revenue budget for 2020/21, as summarised in Appendix A.
- 2.3 Agree to recommend to full Council the cost pressures and technical adjustments set out in Appendix B.
- 2.4 Agree to recommend to full Council the budget savings proposals set out in Appendix C.
- 2.5 Note the report from the Budget Scrutiny Panel in Appendix D. In addition, Cabinet agreed at the meeting to recommend to full Council that any overall underspend across the General Fund at the end of March 2020 is ring fenced and that proposals are brought forward for spending on the climate change emergency.
- 2.6 Agree the HRA budget for 2020/21, as set out in section seven of this report.
- 2.7 Agree the HRA rents for council dwellings, tenant service charges and garages, as set out in section seven of this report.
- 2.8 Agree the rents set under the Housing General Fund for Brent Housing PFI and traveller's site pitches and to note the rents for Hillside dwellings, as set out in section seven of this report.
- 2.9 Note the Dedicated Schools Grant, as set out in section eight of this report.
- 2.10 Agree to recommend to full Council the Capital Programme as set out in section nine and Appendix E and that the Chief Officers be authorised to take all the necessary actions for implementation of the programmes.
- 2.11 Agree to recommend to full Council the changes to the existing Capital Programme in relation to additions of new projects, as set out in Appendix E.
- 2.12 Agree that the Director of Finance be authorised to make the necessary adjustments to the Capital Programme to account for the final 2019/20 outturn position and any associated programme slippage.
- 2.13 Agree to recommend to full Council the Capital Strategy, Investment Strategy, Treasury Management Strategy and Minimum Revenue Provision Policy in Appendices G, H, I and J and to note the pipeline schemes in Appendix F.

- 2.14 Note the advice of the Director of Legal, HR, Audit and Investigations, as set out in Appendix K.
- 2.15 Agree, and where relevant agree to recommend to full Council, the schedule of fees and charges set out at in Appendix L.
- 2.16 Note the results of the budget consultation, as set out in section six and detailed in Appendix M.

Full Council

- 2.17 Agree an overall 3.99% increase in the Council's element of council tax for 2020/21, with 2% as a precept for Adult Social Care and a 1.99% general increase.
- 2.18 Agree the General Fund revenue budget for 2020/21, as summarised in Appendix A.
- 2.19 Agree the cost pressures and technical adjustments set out in Appendix B.
- 2.20 Agree the budget savings proposals set out in Appendix C.
- 2.21 Note the report from the Budget Scrutiny Panel in Appendix D and agree that any overall underspend across the General Fund at the end of March 2020 is ring fenced and that proposals are brought forward for spending on the climate change emergency.
- 2.22 Agree the HRA budget for 2020/21, as set out in section seven of this report.
- 2.23 Agree the dedicated schools' grant, as set out in section eight of this report.
- 2.24 Agree the Capital Programme as set out in section nine and Appendix E and that the Chief Officers be authorised to take all the necessary actions for implementation of the programmes.
- 2.25 Agree the changes to the existing Capital Programme in relation to additions of new projects, as set out in Appendix E.
- 2.26 Agree that the Director of Finance be authorised to make the necessary adjustments to the Capital Programme to account for the final 2019/20 outturn position and any associated programme slippage.
- 2.27 Agree the Capital Strategy, Investment Strategy, Treasury Management Strategy and Minimum Revenue Provision Policy in Appendices G, H, I and J and to note the pipeline schemes in Appendix F.
- 2.28 Note the advice of the Director of Legal, HR, Audit and Investigations, as set out in Appendix K.
- 2.29 Agree the schedule of fees and charges, as set out in Appendix L.

- 2.30 Note the results of the budget consultation, as set out in section six and detailed in Appendix M.
- 2.31 Agree the Pay Policy Statement for 2020/21, as set out in Appendix N.

Council Tax recommendations

These recommendations only include a provisional council tax level for the GLA as its final budget was not agreed when this report was despatched. This means that the statutory calculation of the total amount of council tax under Section 30(2) of the Local Government Finance Act 1992 cannot be carried out until the final GLA precept has been received.

- 2.32 In relation to the council tax for 2020/21 we resolve:

That the following amounts be now calculated as the Council's element by the Council for the year 2020/21 in accordance with Sections 31 to 36 of the Local Government Finance Act 1992 as amended:

- (a) £1,029,121,285 being the aggregate of the amount that the Council estimates for the items set out in Section 31A(2) of the Act.
- (b) 900,990,772 being the aggregate of the amounts that the Council estimates for the items set out in Section 31A(3) of the Act.
- (c) £128,130,513 being the amount by which the aggregate at (a) above exceeds the aggregate at (b) above, calculated by the Council, in accordance with Section 31A(4) of the Act, as its council tax requirement for the year.
- (d) £1,312.74 being the amount at (c) above, divided by the amount for the tax base of 97,605, agreed by the General Purposes Committee on 9 December 2019, calculated by the Council, in accordance with Section 31B of the Act, as the basic amount of its council tax for the year.

(e) Valuation Bands

A	B	C	D	E	F	G	H
£	£	£	£	£	£	£	£
875.16	1021.02	1,166.88	1,312.74	1,604.46	1,896.18	2,187.90	2,625.48

being the amounts given by multiplying the amount at (d) above by the number which, in the proportion set out in Section 5(1) of the Act, is applicable to dwellings listed in a particular valuation band divided by the number which in that proportion is applicable to dwellings listed in valuation band D, calculated by the Council, in accordance with Section 36(1) of the Act, as the amounts to be taken into account for the year in respect of categories of dwellings listed in different valuation bands.

- 2.33 That it be noted that for the year 2020/21 the proposed GLA precept issued to the Council, in accordance with Section 40 of the Local Government Finance Act 1992, in respect of the GLA, for each of the categories of dwellings are as shown below. The GLA intends to agree its precept on 24 February 2020.

Valuation Bands

A	B	C	D	E	F	G	H
£	£	£	£	£	£	£	£
221.38	258.28	295.17	332.07	405.86	479.66	553.45	664.14

- 2.34 That the Council establishes a council tax setting committee, to set the council tax for the year 2020/21, in accordance with section 67(3) of the Local Government Finance Act 1992, and agrees the terms of reference, size and political composition as set out in Appendix O.
- 2.35 That the Council appoints Councillors to serve on the council tax setting committee and appoints a chair and vice-chair of the council tax setting committee.
- 2.36 That the special council tax setting committee meet as soon as possible after 24 February 2020 to allow council tax notices to be issued in line with the normal statutory timetable.
- 2.37 That it be noted that the Director of Finance has determined that the Council element of the basic amount of Council Tax for 2020/21 is not excessive in accordance with the principles approved under Section 52ZB of the Local Government Finance Act 1992.
- (a) That the Director of Finance be and is hereby authorised to give due notice of the said council tax in the manner provided by Section 38(2) of the 1992 Act.
 - (b) That the Director of Finance be and is hereby authorised when necessary to apply for a summons against any council tax payer or non-domestic ratepayer on whom an account for the said tax or rate and any arrears has been duly served and who has failed to pay the amounts due to take all subsequent necessary action to recover them promptly.
 - (c) That the Director of Finance be and is hereby authorised to collect revenues and distribute monies from the Collection Fund and is authorised to borrow or to lend money in accordance with the regulations to the maximum benefit of each fund.

3.0 Strategic Overview

- 3.1 The Council takes a long-term and strategic approach to its corporate and financial planning, linking the new Borough Plan to the budget decisions set out by way of this report. This has been adapted, and will continue to be adapted, in order to meet residents' most important needs whilst remaining within the financial constraints imposed by Central Government.
- 3.2 The proposals in this report enable the Council to set a balanced budget for 2020/21 and set the business plans for 2021/22 and 2022/23 whilst giving some protection to front line services and investing in key projects and priorities. The funding gap in future years, estimated at £6.1m for 2021/22 and 2022/23, demonstrates the difficult service decisions ahead as Central Government funding reductions continue to reduce the resources available to meet increasing service demands.
- 3.3 As set out in the November 2019 Cabinet report, significant reform of the Local Government finance system is expected over the next 12 months, including the ongoing Fair Funding Review, the move to 75% Business Rates Retention and the forthcoming (although much delayed) Adult Social Care Green Paper. Each of these reforms will only succeed if a sufficient quantum of funding is made available for the entire sector through the Spending Review for 2021/22 and beyond. It is vital that the new Government uses these events to place Local Government finance on a genuinely sustainable footing to cope with the expected rise in demand for local services.
- 3.4 Given these ongoing policy changes, authorities are facing a period of significant uncertainty in the run up to the 2021/22 'cliff edge'. Greater clarity over the financial position of Local Government from 2021/22 is essential to reduce the high degree of uncertainty currently built into medium term financial planning.
- 3.5 Despite the delay in implementing these reforms, the Spending Review of September 2019 revealed Local Government funding is set to grow by 4.1% in real terms in 2020/21, an additional £3.5 billion, increasing public spending as a share of national income for only the second time since 2009. On the whole the additional funding is good news for Councils in 2020/21, especially for social care. However, the Government has not put out a detailed timetable of when it will put forward longer-term proposals or when the long-delayed Adult Social Care Green Paper will be published. It remains to be seen how this will link to the Fair Funding Review and the current Adult Social Care precept.
- 3.6 The additional funding announced in the Spending Review will obviously help with in year budget management, but as the funding will be for 2020/21 only it would not be appropriate to use all of this to enter into new longer-term commitments, such as additional staffing, and build in to the base budget. The longer-term position will become clearer once the Spending and Fair Funding reviews are announced.
- 3.7 A key area of concern is that this Spending Round was announced without the Office of Budget Responsibility's latest fiscal forecasts, comments or consultation, as would be expected with a Budget or Spring Statement. This,

coupled with the political uncertainty of a new Government and a potentially disorderly Brexit, means that these allocations have been made with a limited fiscal view and without knowing the real costs of the UK's departure from the European Union.

- 3.8 The provisional Local Government Finance Settlement was announced on 20 December 2019, two weeks later than expected due to the general election. The provisional settlement confirmed the funding announced in the Spending Review. Members will recall that as a result of the new funding announcements the medium term financial planning assumptions were updated and reflected in the draft budget agreed by Cabinet on 11 November 2019. Therefore, no further changes are required to financial planning assumptions and, subject to the outcome of the statutory processes of consultation, scrutiny and equality analyses, the budget presented by way of this report is unchanged from the draft budget.
- 3.9 Since 2010 the Council has delivered against a series of challenging financial targets following a prolonged period of austerity as well as disproportionate growth in demand for services, through a combination of effective financial management and cost control and more innovative approaches to investment and demand management. This approach has been very effective where Brent has managed its finances well by adopting a forward-looking financial strategy based on taking difficult decisions early, allowing time for implementation. The significant reductions in Government funding, as well as challenges posed by new legislation, has meant that the Council has had to deliver savings of £174m since 2010, including an additional £7.4m in 2020/21 and £6.1m between 2021/22 and 2022/23 by way of this report.
- 3.10 Accordingly, this draft budget seeks to set a reasonable and proportionate course over the next three years. The proposals for 2020/21 were extensively consulted upon and agreed by Council in February 2019. New proposals of £6.1m have been consulted upon, which would need to be agreed in order to balance the budgets of 2021/22 and 2022/23. This approach will place the Council in a strong financial position, as planning the budgets for future years well in advance will enable sensible phasing of the implementation of proposals to minimise the impact on services to residents.

4.0 Budget Development Process 2020/21 – 2022/23

- 4.1 Proposals in this budget have initially been developed by officers and then discussed with Members and with the wider community. The key processes were as follows:
- Meetings involving Cabinet and Corporate Management Team members to consider the key service and budget issues likely to affect the Council in future years;

- Development by officers, in consultation with relevant Lead Members, of budget proposals for individual services within the context of the Borough Plan and the overall resources available;
 - Development of the budget approach, based on the updated medium term financial outlook which was considered by the Cabinet in November 2019;
 - The publication of a detailed list of savings proposals at Cabinet in November 2019 for the purposes of consultation, scrutiny and equality analyses;
 - Debates through the Budget Scrutiny Task Group of the Resources and Public Realm Scrutiny Committee;
 - Presentations and question and answer sessions at each of the five Brent Connects meetings in January 2020;
 - Review of the schools budgets by the Schools Forum;
 - Considering feedback from residents, businesses and other key stakeholders, whether received from the online consultation portal, the general 'consultation@brent.gov.uk' email address or other direct representations;
 - Conducting individual equality impact assessments on the budget proposals and a cumulative equality impact assessment on the overall budget in order to ensure that their consequences were properly understood.
- 4.2 This report updates the position on the core estimates that drive the medium term financial planning assumptions, including the outcome of the provisional settlement and the consultation, scrutiny and equalities analyses processes.

5.0 Update/Review of Key Budget Assumptions

Income Assumptions

- 5.1 The provisional 2020/21 Local Government Finance Settlement was announced on 20 December 2019 and provided details of the core funding allocations for local authorities in 2020/21 only. The settlement confirmed the funding announced in the September 2019 one year Spending Review. The key headlines that are relevant for Brent from a financial planning point of view are set out below.

Revenue support grant (RSG) and other relevant grants

- 5.2 As expected, the 2020/21 RSG amount of £24.9m has been confirmed and determined using the 2019/20 amount plus the September CPI inflation increase of 1.63%.

- 5.3 On social care funding, as announced at Spending Round 2019, the provisional settlement confirms the previously proposed national amounts and allocation methodologies. For Brent, this includes £1.3m Winter Pressures Grant, £11.6m Improved Better Care Fund and £8.1m Social Care Grant.
- 5.4 The Government also announced additional resources to reduce homelessness and rough sleeping through the extension of the Flexible Homelessness Support Grant (FHSG) and the Homelessness Reduction Grant. Brent's allocation for the FHSG is the same amount as in 2019/20 of £5.2m and for the Homelessness Reduction Grant £1.2m will be available.
- 5.5 At the date of despatch of this report, allocations for the Public Health Grant had not been announced. That said, the Government announced that there would be a 'real terms increase' in 2020/21, this has been reflected in current funding assumptions.
- 5.6 The settlement confirms Ministers' intention to undertake a fundamental review of the basis of grant allocations, effective from April 2021 onwards (the 'Fair Funding Review'). It is still not possible to make reliable estimates of the impact this will have on Brent and this uncertainty remains the largest single variable in the Council's long-term financial planning. The results of the Fair Funding review are not expected before late 2020, making long-term financial planning difficult. In the meantime, officers will follow developments and respond to the next stage of the various technical consultations planned in 2020.

Council Tax

- 5.7 As expected, the Ministry of Housing, Communities and Local Government (MHCLG) confirmed their intention for the main council tax referendum threshold to reduce to from 2.99% in 2019/20 to 1.99% in 2020/21. The flexibility to raise the Social Care Precept will remain at 2%.
- 5.8 There is an implicit assumption from MHCLG, built into the future funding settlements, that local authorities will increase council tax by up to the referendum limit. As the increase would permanently increase the council tax base income it would also reduce the significant funding pressures in 2020/21 and beyond. After due consideration the recommendation of this report is that the budget should be constructed on the basis of a council tax increase of 3.99% in 2020/21.
- 5.9 Each financial year, the Mayor and London Assembly must prepare and approve a budget for each of the constituent bodies and a consolidated budget for the authority as a whole. On 18 December 2019 the Mayor of London published his draft revenue budget for 2020/21 for consultation and following the announcement of the police grant settlement on 22 January 2020, proposed to increase the precept by £11.56 (or 3.6%) to £332.07 per Band D property in the 32 London Boroughs. This comprises of an additional £10 for the Metropolitan police and £1.56 for the London Fire Brigade, the maximum increase allowed by Government without a referendum. These figures are

subject to change following the consultation process and confirmation of London Boroughs' tax bases. The final GLA budget will be considered by the London Assembly on 24 February 2020. As the GLA's budget will be considered after the Council considers its budget on 19 February 2020, a committee will be established to finalise the overall Council Tax setting process.

Business Rates

- 5.10 The settlement confirmed the end of the 75% London pilot pool, but confirmed that London Boroughs will continue to pool their business rates, albeit under a lower retention rate of 67%. This means that London Boroughs will continue to be treated as one authority for the purposes of various calculations, sharing risk and retaining a greater proportion of business rates growth within London.
- 5.11 The three elements of the Business Rates Retention system (Baseline Need, NNDR Baseline and Top Up amounts) have all increased by 1.63%, in line with the September 2019 CPI inflation figure.
- 5.12 Overall, however, the total amount expected from business rates has not changed from that assumed in the draft budget.
- 5.13 The settlement does not contain any definite indication about the future of business rate pools and retention beyond 2020/21. It would be extremely helpful for long-term financial planning if this vital information was contained within next year's Local Government Settlement, following on from the Spending and Fair Funding reviews.

Expenditure Assumptions

- 5.14 Critical to understanding the overall budget are the annual growth assumptions, or estimated increases in unavoidable expenditure, that are built in to medium term financial planning, for example contract inflation, pay inflation, meeting the cost of providing existing services for a growing population, etc. These estimates were reviewed and set out for Cabinet in November 2019 as part of the draft budget and further details can be found in Appendix B. For the avoidance of doubt, these expenditure assumptions represent the annual costs, all else being equal, that would have to be incurred just to stand still. A summary of these growth and cost pressures are shown in the table below.

Assumption	Extra cost per annum (£m)	Description

Demography	3.5	Estimated annual cost of providing the same services to a growing population. Indicative allocations are £2m Adult Social Care, £0.5m Housing, £0.5m Children's Social Care, £0.3m Public Realm and £0.2m various corporate departments.
Payroll	2.1	Based on a 2% pay award and new pay spines.
London Living Wage	1.5	Assumed average annual cost of making more contracts LLW compliant.
Contracts	3.9	Primarily based on 2% inflation and known contractual commitments. Indicative allocations are £1.5m Community Wellbeing, £0.8m Children's Social Care, £0.9m Regeneration & Environment and £0.7m various corporate departments.
Transport	1.3	Freedom passes and transporting children with Special Educational Needs.
Technical	0.5	Pensions, levies (e.g. West London Waste Authority) and other technical items.
Capital financing	0.2	Interest and debt repayment costs for the capital programme.
Total Growth	13.0	

Overall funding position

- 5.15 The table below sets out the overall balanced budget for the next three years and is unchanged from the draft budget agreed by Cabinet in November 2019. As set out earlier in the report, until a longer-term Spending Review is published and until the direction of the Fair Funding review is clearer this estimate will be subject to considerable change or at least uncertainty.

	2020/21	2021/22	2022/23
	£m	£m	£m
Expenditure			

Assumed budget brought forward before in-year growth and savings	276.0	289.8	295.7
Demographic Growth	3.5	3.5	3.5
Other Growth	9.5	10.6	10.6
Total Expenditure	289.0	303.9	309.8
Income			
Revenue Support Grant	(24.9)	(21.7)	(18.8)
Specific Grants (e.g. Public Health)	(39.3)	(39.3)	(39.3)
Total funding from Central Government	(64.2)	(61.0)	(58.1)
Council Tax	(128.1)	(135.2)	(141.4)
Business Rates	(97.5)	(99.5)	(101.7)
Total funding from residents and businesses	(225.6)	(234.7)	(243.1)
Total Income	(289.8)	(295.7)	(301.2)
Savings required (Expenditure less Income)			
£7.4m savings agreed in February 2019 for 2020/21	(7.4)	–	–
£6.1m savings put forward in February 2020 for 2021/22 – 2022/23	–	(4.3)	(1.8)
Re-profiling adjustment	8.2	(3.9)	(7.3)
Contingency	–	–	0.5
Grand Total	0.0	0.0	0.0

6.0 Statutory process of consultation, scrutiny and equalities analyses

Equalities

- 6.1 The Council has a duty to pay due regard to the need to eliminate unlawful discrimination and advance equality of opportunity and foster good relations between those who have a protected characteristic and those who don't when making decisions. Each of the budget proposals attached in Appendix C have been subject to an initial equality impact assessment (EIA) to assess their potential or likely impact on service users and employees with protected characteristics. Where the EIA process identified a disproportionately negative impact with no reasonable mitigation, the proposals were subject to a full EIA. In addition to individual EIAs, a cumulative (or overall) EIA has been produced to assess and understand the potential cumulative and compounding impact on groups with a protected characteristic that arise from either changes across a range of services or a group of savings proposals. These EIA reports are included within Appendix C alongside the actual proposal. In summary, it has been concluded that all of the proposals are considered reasonable and have shown due regard to the Public Sector Equality Duty.
- 6.2 It is important to note that in some cases when budgets are reduced in any particular area, further decisions will be required to implement the initiative achieving the budget reduction. Those further decisions are often subject to consultation or engagement with residents and other stakeholders and to the results of EIAs or assessments of best value. The results of any consultations and EIA considerations subsequent to those referred to at 6.1, will be analysed and taken into account as part of the decision making process required to put the proposed budget into effect. The savings that can be derived from these initiatives identified in the budget presented for agreement are therefore subject to change. If the proposals are changed in a way that materially reduces the budget reductions derivable from them (for example from having considered in detail the results of a consultation), there will be a need to make up for the shortfall from other additional reductions elsewhere, the use of reserves or by departing from the budget envelope – for which there is a particular constitutional procedure.

Scrutiny

- 6.3 A Budget Scrutiny Task Group was convened after the Cabinet published the draft budget proposals in November 2019. The panel, made up members of the two scrutiny committees (Resources & Public Realm and Community Wellbeing) reviewed the proposals, as well as the budget development process, with relevant Lead members and officers. The panel's report and recommendations, attached in full at Appendix D, were considered and adopted by the Resources & Public Realm scrutiny committee on 29 January 2020 as part of the Cabinet's decision making.

Consultation

- 6.4 The Council recognises consultation as a key part of policy formulation, and makes considerable effort to ensure that the views of residents, businesses and

other key stakeholders are taken into account. The Council has consulted on the budget options in a variety of ways. Legally, the results of consultation are something that Members must have due regard to in making budget decisions. However, consultation need not legally be the single or even most significant determining factor in choosing between difficult options, although at Brent considerable emphasis is usually placed on the results of consultation.

- 6.5 As previously set out, the budget proposals for 2020/21 were endorsed by Council in February 2019 following an extensive consultation process, as well as scrutiny and equalities analyses. For clarity, these are the proposals set out in Appendix C (i).
- 6.6 The consultation, instead, focused on the new proposals for 2021/22 and 2022/23. These are summarised in Appendix C (ii) and set out in more detail in Appendix C (iii). The following paragraphs set out the results of the various consultation processes.
- 6.7 Brent Connects is a well-established public consultation forum for local residents, businesses and other stakeholders with meetings spread across the borough. The Council has consulted on the budget proposals at all five Brent Connects event's in January 2020. At these events a presentation was delivered by either the Leader or Deputy Leader and supported by officers, followed by a question and answer session. The table below sets out the schedule of events.

Brent Connects	Date	Attendance
Kingsbury and Kenton	Monday 27 January 2020	25
Harlesden	Monday 13 January 2020	16
Kilburn	Wednesday 8 January 2020	18
Wembley	Tuesday 28 January 2020	37
Willesden	Thursday 30 January 2020	32

- 6.8 The detailed budget proposals were published on the Council's website, inviting comments and feedback through the online consultation portal. A number of people accessed the online consultation and provided responses. Appendix M contains further information about the results of consultation and sets out a summary of emerging themes and other key findings.
- 6.9 There are a number of business forums and associations that the Council regularly engages with that include a wide range of both small and large local businesses. These include West London Business (a non-profit business membership organisation), the Federation of Small Businesses, a number of town centre business associations and the Brent Business Board. The consultation on the budget was published on the front page of the quarterly newsletter sent to a large number of Brent businesses, explaining why the views of local businesses were important and how they could have their say.

- 6.10 The local voluntary sector is closely engaged with Brent's communities and has considerable experience of the impact of the Council's difficult choices against a background of funding reductions. Engagement with the local voluntary sector has therefore been an important part of the consultation process. Invitations to participate in the consultation were sent to all Brent voluntary and community sector organisations. In addition, the consultation was publicised in the CVS Brent newsletter throughout the consultation period. A response to the consultation was received from CVS Brent, commenting on the overall financial position of the Council and two specific proposals. These comments are addressed in the detailed savings templates set out in Appendix C (iii).
- 6.11 In order to maximise the opportunity for comment the consultation was kept open to 31 January 2020. The comments above reflect the position shortly before that date to fit in with the despatch deadlines for this report. In the event that significant numbers of new comments are received subsequent to this, an update will be provided to Cabinet.
- 6.12 Overall, one of the main aims of the consultation and communication strategy was to raise awareness of the Council's financial position, inform residents on how the Council spends its budget and ensure residents, businesses and other key stakeholders were fully aware of the opportunities to have their say, by knowing how to respond and when the consultation events were taking place. This was delivered through a variety of communication channels, including advertising in local papers, publicity on the Council's website, media briefings and use of the Council's Facebook and Twitter accounts to disseminate reminders and encourage residents to participate.
- 6.13 All of these consultation responses are important. Members need to have regard to them, but are not obliged to follow the suggestions made. It is relevant to note that the consultees are, statistically speaking, "self-selecting" and therefore not necessarily reflective of opinion in the borough as a whole, nor are they necessarily statistically significant. On the other hand, the people who have responded have chosen to take the time to review the Council's proposals and to contribute their thoughts, and often their views will be representative of the views of a much larger number of people.

7.0 Housing Revenue Account Budget and Housing General Fund Budget 2020/21

Housing Revenue Account

- 7.1 The proposed HRA annual budget for 2020/21 sets out proposed expenditure for housing management services, stock investment and maintenance works and new Council housing development programmes as well as rent and service charge setting proposals for 2020/21. This report also includes Housing General Fund rent-setting proposals for stock managed by Hillside (Hyde Group) and for the Residential Pitches portfolio.
- 7.2 After four consecutive years of rent reductions, 2019/20 will be the final year of the required 1% rent reduction as set out in the Welfare Reform Act. The

Government has set out its rent policy, which allows rent levels to be increased by CPI +1% for the next five years starting from April 2020.

- 7.3 The table below shows the average rent per week, for the various bed sizes, before the 1% rent reductions compared to current rates, and the proposed increase of 2.7% (CPI+1%) for 2020/21. All new re-lets are charged at formula rent, therefore the current average rent will not be a directly comparable reduction against 2015/16.

Rent setting proposal for 2020/21

Bed Size	Average Net Rent 2015/16 (before rent reductions)	Current Average Net Rent 2019/20	Proposed Average Net Rent 2020/21 (2.7%)	Proposed v 2015/16 Rent
	£	£	£	£
Bedsits	88.12	84.59	86.87	(1.25)
1	102.06	98.46	101.12	(0.94)
2	115.66	113.59	116.65	0.99
3	127.73	125.55	128.94	1.21
4	138.95	135.96	139.63	0.68
5	148.83	147.63	151.61	2.78
6	152.56	155.39	159.59	7.03
Average Rent	114.53	112.06	115.08	0.55

- 7.4 The proposed rent rates for 2020/21 will be on average £0.55 per week (0.48%) more than they were in 2015/16. The average rent increase compared to the current financial year is estimated to be £3.02. As part of the statutory rent setting process, the proposed rent increase was put out for consultation on the Council's online portal on 27 December 2019 and closed on 26 January 2020.
- 7.5 The rent increase will contribute towards the Council's future years investment programme in council homes, including £13.5m on fitting new kitchens, bathrooms, windows and roof renewals, £3m of appropriate fire safety measures, and carry out £0.5m of estate improvements such as bike sheds, build new family homes, and create user-friendly technology systems.
- 7.6 The net rent amounts are excluding service charges. The service charges are a recharge to tenants and leaseholders which is based on the actual costs incurred for providing specific services, such as estate cleaning.

Tenants Service Charges

- 7.7 It is proposed that service charges for HRA dwellings are increased by an average of £0.21 per week (2%). The individual service charge elements have been adjusted to bring them in line with the estimated contract costs of providing these services to tenants in 2020/21. This is shown in the table below which displays the average charges made to date in 2019/20, and which reflects the current number of units.

Tenants Service Charges for 2020/21

Service	Current Average Charge 2019/20	Recommended Average Charge 2020/21	Estimated Increase / (Decrease)
	(£/Week)	(£/Week)	%
Concierge	9.64	10.70	11%
Communal Lighting	1.42	1.49	5%
Grounds Maintenance	1.35	1.35	0%
Cleaning (Internal and External)	6.87	6.87	0%
Laundry	2.75	2.75	0%
TV Aerial	0.74	0.74	0%
Communal Heating (District)	8.27	8.68	5%
Hot Water	2.28	2.39	5%
Helpline Monitoring Service	1.49	1.56	5%
Average Charge	9.92	10.13	2%

Garages Rent Setting

- 7.8 The HRA currently has 280 active garage accounts, a reduction of 51 accounts compared to 2018/19. The estimated annual income for 2019/20 is £0.20m, a reduction of £0.04m from previous year. It is proposed for 2020/21 that charges should increase by 2.7% (CPI plus 1%) for residents and 3.1% for non-residents. Average weekly charges are shown in the table below.

Proposed charges for Garages 2020/21

Average Weekly Charge	Existing charge 2019/20	Proposed charges 2020/21	Proposed Increase
	£	£	%
Residents	10.67	10.96	2.7%
Non-residents	16.55	17.06	3.1%

HRA forecast outturn 2019/20

- 7.9 In the current financial year, budget pressures of £0.5m have been identified. This is due to the additional staffing and associated costs of bringing the estate cleaning team, previously carried out by Wettons, in-house from September 2019.
- 7.10 A projected underspend on responsive void works of £0.3m will partially offset budget pressures. In addition to this, the annual adjustments to reflect actual costs incurred by the Council in relation to service charges has resulted in an additional £0.2m leasehold service charge income, this will contribute towards mitigating the full risk of overspend in 2019/20. Overall, the HRA is forecasting to spend in line with the approved balanced budget set in February 2019.

HRA budgets 2020/21

- 7.11 The proposed budget for 2020/21 is set out in the table below and shows a net balanced budget. The budget movements are as a result of the items summarised below:

Technical adjustments	£m
Rent increase of 2.7% on 2019/20 base stock.	(1.3)
Additional rent from 119 new homes expected between 2019/20 and 2020/21.	(0.7)
Increase for cost of borrowing to fund the new council homes programme, and interest rate rises from the Public Works Loan Board (PWLB), which took effect from October 2019.	1.8
Reduction in revenue contributions on capital works due to re-profiling of major works to existing properties, bringing it in line with the Asset Management Strategy.	(0.5)
Increase for re-alignment of leaseholders service charge budget to bring it in line with actual billed values from 2019/20.	(0.2)
Growth	£m
Increases on pay and operational cost inflation.	0.5
Repairs contract inflation increases.	0.5
Associated costs of in-house estate cleaning services.	0.1
Supporting community hubs.	0.1
Savings	£m
Budget decrease on void works due to reductions on eviction rates and revision of assumed void rates based on 2019/20 in-year performance.	(0.1)

Efficiency savings across housing management following successful implementation of the transformation programme.	(0.2)
Total Net Movement	0.0

7.12 The proposed 2020/21 HRA budget will ensure that the HRA will continue to hold £1.3m in reserve balances as part of the 30 year HRA business plan.

HRA Final Budget 2019/20 v Draft Budget for 2020/21

	Final Budget 2019/20 (1)	Draft Budget 2020/21 (2)	Variance (2-1)	Variance Explanation
Description	£m	£m	£m	
Rents and Service Charge	(48.2)	(49.9)	(1.7)	Tenant rents and service charges plus new homes offset by rent loss through voids and RTB sales
Non Dwelling Rents	(0.2)	(0.5)	(0.3)	
Leaseholders' Charge for Services and Facilities	(2.4)	(2.6)	(0.2)	Increase in line with service charge actuals in 2019/20
Major Works and Other Contribution Towards Expenditure	(2.4)	(2.3)	0.1	
Total Income	(53.2)	(55.3)	(2.1)	
Repairs and Maintenance	11.4	11.7	0.3	Voids budget savings offset by inflationary uplift on repairs contracts
Supervision and Management	11.4	11.8	0.4	Transformation savings offset by inflationary uplift on pay and on costs, and community hub funding
Special Services	4.0	4.1	0.1	Staffing, vehicle and equipment costs of delivering in-house estates cleaning team
Rent and Rates and Others Charges	0.9	0.9	0.0	
Depreciation of Fixed Assets	17.7	17.2	(0.5)	Reduction to capital contributions
Bad or Doubtful Debts	0.4	0.4	0	

Capital Financing and Debt Management	7.4	9.2	1.8	Increased borrowing for investment in new council homes and interest rate rise from PWLB
Total Expenditure	53.2	55.3	2.1	
(Surplus)/or Deficit for the Year on HRA	0.0	0.0	0.0	
Housing Revenue Account brought forward	(1.3)	(1.3)	(0.0)	
(Surplus)/or Deficit on HRA	0.0	0.0	0.0	
Closing balance	(1.3)	(1.3)	0.0	

HRA Stock Improvement and Major Works Budget 2020/21 and 2021/22

- 7.13 Planned works include refurbishments such as new roofs, facades, windows, lifts, kitchens, bathrooms, heating systems and the planned fire safety works for 2020/21.
- 7.14 The Asset Management Strategy highlights the requirement for a stock improvement and major works capital budget of £17m for 2020/21.
- 7.15 To ensure the efficient delivery of this multi-year capital programme, it would be prudent to allocate an indicative 2021/22 major works budget, estimated to be £17m. In total, this results in £34m investment in council homes over the next 2 years.

New Council Homes Programme 2020/21

- 7.16 The development and management of new council homes and affordable housing remains a key priority of the Council's Housing Strategy and of the HRA Asset Management Strategy.
- 7.17 The 2019/20 planned expenditure is £17.8m on new council homes and acquisition. Further continued investment of £83m over the next 4 years to deliver 310 new homes is currently at the planning stage. The new build budget for 2020/21 is £28m towards the delivery of 260 homes.

Housing General Fund

Hillside Rent Setting 2020/21

- 7.18 In addition to the dwellings contained within the HRA, the Council also continues to hold dwellings in the General Fund (GF). These dwellings were

formerly held by the Stonebridge Housing Action Trust (HAT) and were transferred to Brent Council in August 2007 when the HAT was dissolved. The Council currently owns 324 properties under this scheme and Hillside Housing Trust (part of Hyde Housing Group) manages these properties on the Council's behalf.

- 7.19 The table below sets out the rent levels for 2020/21, with an average increase of £3.28 per week:

Range of Weekly Rents for 2020/21

	Weekly Rent 2019/20 (£)	Weekly Rent 2020/21 (£)	Increase (£)	Increase (%)
1 Bed Flat	99.35	102.03	2.68	2.7%
2 Bed Flat	117.61	120.79	3.18	2.7%
1 S/croft Elders	99.35	102.03	2.68	2.7%
2 S/croft Elders	117.61	120.79	3.18	2.7%
2 Bed House	127.74	131.19	3.45	2.7%
3 Bed House	140	143.78	3.78	2.7%
4+ Bed House	147.38	151.36	3.98	2.7%

Hillside are also responsible for setting service charges across the stock, including those retained by the Council. The average service charge per week for 2020/21 is set at £6.71 per week, an increase of £0.18 from the 2019/20 average, based on an uplift of 2.7% (CPI + 1%).

Housing Private Finance Initiative (PFI) 2020/21

- 7.20 The Housing PFI refers to 364 units of rented accommodation managed by Hyde under a PFI contract. The stock is made up of a mixture of Temporary Accommodation, Affordable Rent and Discounted Market Rent properties. As per the Cabinet decision on the 17 January 2017 in regards to PFI Housing Tenancy Conversions, Temporary Accommodation units are being phased out with the units being converted into Affordable Rent and Discounted Market Rent properties.
- 7.21 The proposal is to hold the rents at the current levels, with no increase for the coming year.

Travellers' Site Pitch Rent 2020/21

- 7.22 The current weekly pitch rent is £144.15. It is proposed to increase this by CPI + 1% (2.7%) to £148.04 for 2020/21. It is estimated to generate an annual income of £0.24m.

8.0 Schools Revenue Budget

- 8.1 The Dedicated Schools Grant allocations were announced on 19 December 2019, and the proposed budget, as described below, was endorsed by the Schools Forum on 15 January 2020. The main Schools Block which supports mainstream schools has been confirmed at £234.7m, which is £3.7m more than last year. It equates to £5,563 per pupil, an increase of £41 compared to 2019/20. This overall increase is due to a national minimum increase in pupil funding, and an increase in the number of secondary pupils. The number of primary phase pupils funded in the formula has reduced slightly compared to last year, but overall mainstream pupil numbers in Brent rose from 41,997 to 42,186. The gains in funding do however mask a £1m reduction to the block due to changes in the national funding formula pupil growth allocations.
- 8.2 During the autumn term Schools Forum were consulted on and agreed some adjustments to the local funding formula. A new factor for funding schools with more mobile cohorts of pupils will be introduced, and the pupil growth fund has been increased to fund further expected increases in secondary pupils. The additional Schools block funds were also used to increase all pupil funding factors, and all schools will receive a minimum 0.5% per pupil funding increase. The report on the mainstream funding formula recommends that 0.46% (£1m) of the mainstream schools funding block be transferred to the High Needs block which provides for SEND pupils. This was recommended as a measure to address the increasing demand for SEND provision. Separate to the DSG there are also significant grants from Central Government to assist schools in meeting the costs of the teachers' pay rise and the increased contributions to the teachers' pension scheme.
- 8.3 The allocation for the High Needs Block has been announced at £61.3m. This is £5m more than received in 2019/20 and represents a 9% increase. This is Brent's share of an 11% national increase in High Needs funding. Like most authorities Brent is facing substantial pressures in this area, and is overspending in 2019/20. The £5m additional funding and the £1m Schools block transfer will be allocated against these pressures across the High Needs block budget for 2020/21 in consultation with the Schools Forum High Needs sub group. The DfE are changing the terms and conditions of the DSG, to make it clearer that any deficit position can be carried forward against the grant for future years. It is envisaged that a multi-year recovery plan would then be required in addition to sustained increases in funding.
- 8.4 The provisional Early Years block was announced at £22.9m. This allocation is updated in July each year following the confirmation of the spring early years census. There are marginal increases to the hourly funding rate allocations for

2 year olds and 3 and 4 year olds. A small block of DSG funding which supports some central services has reduced slightly to £2.2m. This brings the total 2020/21 DSG allocation for Brent to £321.1m.

9.0 Capital Programme

- 9.1 The Capital Programme is a key part of the overall budget setting process. It is focused on supporting the delivery of the Council's statutory responsibility in relation to ensuring there are sufficient school places available for children and young people whilst, investing in new affordable housing and in our existing housing stock, town centres, public realm and community facilities across Brent.
- 9.2 A key element of the Council's successful financial strategy has been to expand the capital investment programme and enable it to deliver substantial revenue savings over the medium term financial planning (MTFP) period. For example, the £12.5m investment in the Digital Strategy implementation is expected to generate savings of £4.2m over the five-year period.
- 9.3 The Capital and Investment Strategies (Appendix G & H) provide further details on the overall capital strategy, which sets out how capital investment supports the delivery of the Council's objectives. It sets out the main objectives for the Council over the medium term financial planning (MTFP) period 2020/21 – 2024/25.
- 9.4 Until recently the Council has utilised internal cash resources to fund the elements of the Capital Programme in lieu of borrowing, this has kept the interest costs low as it delays the requirement to undertake new external borrowing. Looking ahead borrowing will be undertaken for specific schemes and prioritised where it can have a net positive impact on the revenue budget and there is a clear repayment plan for the capital.
- 9.5 The Capital Programme schemes which are funded using a combination of external grants and borrowing will only be undertaken once the external funding is secure; amounts of Council borrowing shown are indicative. Table 1 shows the Council will require c£471m of borrowing over the 5 year period to fund the Capital Programme of which the interest costs will be charged to the revenue capital financing budget.
- 9.6 Looking further ahead there are plans to utilise S106/Community Infrastructure Levy (CIL) to undertake major infrastructure projects meeting the conditions or terms for funding (e.g. £15.2m allocated from Strategic CIL to pay for the build of the education centre and workspace on the Morland Gardens project).
- 9.7 The Council has embarked on an extensive Capital Programme to invest c£779m over 5 years, 2020/21 to 2024/25. The sum includes significant spend across the General Fund and Housing Revenue Account (HRA) to support the strategic vision of the Council across the borough. Since the capital budget was agreed by Council in February 2019 the pipeline projects approved and

promoted during the year have been included in the 2020/21 to 2024/25 Capital Programme. The balance of provisional schemes held in the pipeline is currently £545m for 32 projects. The pipeline provision has not been included in the Capital Programme set out in Table 1 and Appendix E but are shown as a separate summary in Appendix F.

- 9.8 A summary of Capital Programme and financing arranged according to portfolio (excluding pipeline provision) for 2020/21 to 2024/25 is set out in Table 1. The detailed Capital Programme is set out in Appendix E.
- 9.9 The 2019/20 revised budget reported to Cabinet in January 2020 was £246.7m. The revised budget is subject to change as new schemes are approved prior to Council in February 2020. The budget changes since the Quarter 3 monitoring reported to Cabinet is c£14.4m and is comprised of the following:
- £3.45m total budget on Picture Palace approved by Cabinet in October 2019. £2m was allocated in 2019/20 and £1.45m in 2020/21.
 - £7.3m re-profiled RTB Affordable Housing spend from future years to meet 2019/20 target spend.
 - £1.86m re-profiled budget on South Kilburn due to increased purchasing activity.
 - £1.1m additional budget due to TfL bus improvements projects to be funded from S106.

Table 1 – Summary Capital Programme

Portfolio	BOARD (PROGRAMME)	2019/20 (Revised Budget)	2020/21 Budget	2021/22 Budget	2022/23 Budget	2023/24 Budget	2024/25 Budget	TOTAL 2020/21 to 2024/25
		£m	£m	£m	£m	£m	£m	£m
Resources: Cllr Margaret McLennan	Corporate Landlord	10.553	22.100	53.000	8.500	1.500	–	85.100
Regeneration: Highways, Planning: Cllr Tatler	South Kilburn	10.628	23.972	23.805	15.014	5.931	5.452	74.174
	Regeneration	4.049	18.726	19.150	23.450	–	–	61.326
St Raphael's : Cllr Tatler	St Raphael's	0.988	0.300	–	–	–	–	0.300
Regeneration: Highways, Planning: Cllr Tatler	Public Realm	18.509	23.477	5.729	5.651	5.645	–	40.502
Public Health: Culture & Leisure: Cllr Krupa Sheth	Public Realm	1.048	0.105	–	–	–	–	0.105
Environment: Cllr Krupa Sheth	Public Realm	1.615	0.360	–	–	–	–	0.360
Schools: Employment & Skills: Cllr Amer Agha	Schools	10.790	11.474	16.376	16.937	–	–	44.787
Housing & Welfare Reform: Cllr Eleanor Southwood	Housing GF	23.190	70.696	63.044	55.170	28.600	–	217.510
	HRA	110.032	92.080	74.133	8.057	0.895	–	175.165
	i4B – Phase 1 & 2	69.749	27.403	23.500	23.500	–	–	74.403
	Capitalisation	–	1.776	1.776	1.776	–	–	5.328
	Total	261.151	292.470	280.514	158.054	42.570	5.452	779.060

- 9.10 The Capital Programme is comprised of projects approved by annually by Cabinet as well as new approvals in year. New capital schemes and projects will usually be added to the Capital Programme as part of the annual budget setting process, however, the governance arrangements allow for new schemes and projects to be added in year, subject to appropriate approval.
- 9.11 The Capital Programme detailed in Table 1 above currently excludes slippage from the 2019/20 Capital Programme. Estimated slippage and re-profiled projects are detailed in the quarter 3 capital monitoring report to Cabinet in January 2020. The potential slippage from 2019/20 will be reviewed at the end of the financial year and reported to Cabinet in July 2020.
- 9.12 There are a number of key projects supported in the 2020/21 – 2024/25 Capital Programme and these were set out in more detail for Cabinet on 10 February 2020.

Statutory Capital & Treasury Reports

- 9.13 In recognition of the importance of capital investment in asset and treasury management to Council activities, CIPFA and Central Government have compiled codes of practice and regulations for Councils to follow. These ensure that Councils have effective processes and practices in place to control, manage and govern capital investment decisions, that include borrowing and treasury management practices.
- 9.14 The requirement on local authorities in relation to this statutory guidance is that they should “have regard” to such guidance and each year must produce a number of documents/strategies for approval by Council or a nominated body.
- 9.15 The various statutory reports are as follows:
- Capital Strategy (high-level report covering the basics of capital programme, treasury management and investments for service commercial reasons) – Appendix G.
 - Investment Strategy (disclose the contribution that investments make “towards the service delivery objectives and / or place making role of the local authority – Appendix H.
 - Treasury Management Strategy (the Chartered Institute of Public Finance and Accountancy’s Treasury Management in the Public Services: Code of Practice 2017 Edition (the CIPFA Code) requires the Council to approve a treasury management strategy before the start of each financial year. The strategy outlines a framework within which the Council manages its cash flows, borrowing and investments, and the associated risks – Appendix I.
 - Minimum Revenue Provision (the process for calculating the annual charge to the revenue account of provision to repay debt incurred in respect of capital expenditure financed by borrowing or other long-term credit arrangements (such as PFI) – Appendix J.

- The statutory reports have been included for approval in Appendices G, H, I and J.

10.0 Pay Policy Statement 2020/21

- 10.1 Section 38 of the Localism Act 2011 requires local authorities to publish an annual 'Pay Policy Statement', setting out their policies in respect of chief officer remuneration and other specified matters. Regard must be had to guidance to be published by the Secretary of State in preparing the statement, which must be approved by full Council. The Council is then constrained by its pay policy statement when making determinations on chief officer pay, although the statement may be amended at any time by a further resolution of the full Council. No new guidance has been published since the statement was adopted for 2019/20 and so there are no proposed changes related to the guidance. The Draft Pay Policy Statement, attached as Appendix N contains minor updating and cosmetic changes from the Statement adopted by full Council for the last financial year.

11.0 Overall summary and conclusion

- 11.1 Local Government continues to face an extremely challenging financial outlook following a prolonged period of austerity as well as disproportionate growth in demand for services. The Council has faced significant reductions in Government funding, as well as challenges posed by new legislation, and has had to deliver savings of £174m since 2010, including a further £13.5m over the next three years by way of this report. In addition, there is a growing level of uncertainty as the cliff edge of 2021 approaches – marking the end of the current Spending Review period and start of the new funding baselines (following the Fair Funding Review) and 75% business rates retention scheme.
- 11.2 As funding has been cut the population has grown and this has been particularly pronounced in the very oldest and very youngest age groups, which are statistically most likely to require services from the Council, thus adding to the cost pressures. Coupled with the impact of legislative change, this has created substantial financial pressures.
- 11.3 There is no doubt that the short term funding boost is welcomed in Local Government, particularly for social care departments. Demand for social care is rising and funding will benefit some of the most vulnerable members of our society. However, in order to address the national social care crisis, larger and more frequent funding boosts will need to follow.
- 11.4 A key area of concern is that this Spending Round was announced without the Office of Budget Responsibility's latest fiscal forecasts, comments or consultation, as would be expected with a Budget or Spring Statement. This, coupled with the political uncertainty of a new Government and a potentially disorderly Brexit, means that these allocations have been made with a limited

fiscal view and without knowing the real costs of the UK's departure from the EU.

- 11.5 Despite dealing with these pressures and uncertainties, and subject to the remaining uncertainties in the financial planning assumptions, some of which are simply inherent in any budgeting process, the Council has sufficient options at its disposal to balance the budget for the next three years.
- 11.6 It is worth reflecting on the strength of this financial position. Officers' expectation is that savings of £6.1m will be needed between 2021/22 and 2022/23 in order to be able to agree a balanced budget for those years. This includes a £0.5m contingency budget to mitigate any unforeseen risks to future budget assumptions. If the proposals put forward by way of this report are adopted, the Council will be able to balance its budget for the next three years. Setting budgets for more than a single year will also allow the Council to continue its longer-term approach to financial planning, identifying more opportunities to reduce costs without significant reductions to services that residents value.

12.0 Financial Implications

- 12.1 The Council's financial position has been set out in this report and Members are under a legal obligation to set a balanced budget. In doing so they are obliged, under normal administrative principles, to take into account the various relevant factors, particularly in respect of consultation and equalities. In doing so Members are, of course, entitled to exercise their political judgement, paying regard to the relevant factors rather than being absolutely determined by them.
- 12.2 The budget report sets out a comprehensive picture of the Council's finances over the short, medium and long-term to assist in the decision making process in setting the 2020/21 budget and the forward looking business plans.
- 12.3 In considering the budget report, a key consideration should be the delivery of the saving programme as it presents substantial management challenges. Again, considerable management attention has been and is being devoted to ensure that these can be delivered, but it is important to stress again the inherent risks in delivering such a complex programme.
- 12.4 In addition to the risk of delivery of the savings programme, there remains considerable uncertainty on the future of Local Government funding from 2021/22. In consequence, and following a comprehensive review of budget assumptions, the general reserve is expected to increase from £15m to £20m. This level is still relatively low for London, but is not unreasonable.
- 12.5 That said, the budget now proposed is realistic and affordable, albeit challenging. The increases in council tax set out, if agreed, will generate significant additional revenue over time, minimising the number of difficult new decisions about funding for specific services to be proposed. If agreed, this

budget would provide for affordable services in 2020/21, but further savings of £6.1m are estimated to be required between 2021/22 and 2022/23.

- 12.6 Formally, this section of the report is the report of the section 151 officer to which the Council is required by section 25 of the Local Government Act 2003 to have regard confirming that if the budget as proposed were to be agreed the estimates made for the purposes of the calculations are robust and the proposed financial reserves are adequate.

13.0 Legal Implications

- 13.1 These are set out in Appendix K.

14.0 Equality Implications

- 14.1 Section six of this report provides more details of the approach to complying with the Equalities Act 2010 and the outcome of equalities impact assessments.

15.0 Consultation with Ward Members and Stakeholders

- 15.1 Section six of this report provides more details of the statutory consultation process with regards to setting the 2020/21 budget.

16.0 Human Resources

- 16.1 Of the proposals identified in Appendix C, there are some where there is a potential impact on staffing and could be subject to redundancy. However, the number of redundancies is not expected to be significant since the introduction of a 'time limited' voluntary redundancy scheme in 2018.
- 16.2 The Council will apply its Managing Change Policy and Procedure in the application of all restructuring arrangements which have an impact on staff, consulting with staff and Trade Union representatives accordingly.

Related Document:

Draft Budget 2020/21 – 2022/23 and medium term financial outlook, Cabinet November 2019

Report sign off:

MINESH PATEL
Director of Finance

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LIST OF APPENDICES

Appendix A	Overall Revenue Budget 2020/21
Appendix B	Service Cost Pressures 2020/21
Appendix C (i)	Summary of savings proposals 2020/21
Appendix C (ii)	Summary of savings proposals 2021/22 & 2022/23
Appendix C (iii)	Detailed budget templates 2021/22 & 2022/23
Appendix C (iv)	Cumulative Equalities Assessment
Appendix C (v)	Individual Equality Analyses of Budget Proposals
Appendix D	Budget Scrutiny Report
Appendix E	Detailed Capital Programme 2020/21 to 2024/25
Appendix F	Capital Pipeline Schemes Summary
Appendix G	Capital Strategy 2020/21
Appendix H	Investment Strategy 2020/21
Appendix I	Treasury Management Strategy 2020/21
Appendix J	Minimum Revenue Provision (MRP) Statement 2020/21
Appendix K	Legal Advice
Appendix L (i)	Fees & Charges Explanatory Note
Appendix L (ii)	Fees & Charges Schedule
Appendix L (iii)	Fees & Charges Policy
Appendix M	Budget Consultation
Appendix N	Pay Policy Statement 2020/21
Appendix O	Council Tax setting committee

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Appendix A: Overall Revenue Budget 2020/21

The table below sets out the revenue budget for each directorate in 2020/21 and how this has changed from the 2019/20 budget.

	2019/20 Current Budget £m	Growth £m	Savings £m	Technical Adjustments £m	2020/21 Approved Budget £m
Service Area Budgets					
Community Wellbeing	122.7	6.0	(4.2)	0.0	124.5
Children & Young People	45.3	1.8	(1.6)	0.0	45.5
Regeneration & Environment	39.7	2.3	(0.8)	0.0	41.2
Customer & Digital Services	20.0	1.9	(0.4)	0.0	21.5
Assistant Chief Executive	7.5	0.3	(0.3)	0.0	7.5
Chief Executive's Departments	15.6	0.3	(0.1)	0.0	15.8
Total Service Area Budgets	250.8	12.6	(7.4)	0.0	256.0
Central Budgets	25.2	0.4		8.2	33.8
Total Budget Requirement	276.0	13.0	(7.4)	8.2	289.8
Funding					
Business Rates	95.5	0.0	0.0	2.0	97.5
Revenue Support Grant	24.5	0.0	0.0	0.4	24.9
Specific Grants	34.0	0.0	0.0	5.3	39.3
Council Tax	122.0	0.0	0.0	6.1	128.1
Total Funding	276.0	0.0	0.0	13.8	289.8

Revenue Budget 2020/21 – Service level budgets

The tables below set out the net revenue budget for each directorate at a service level

	2019/20 Current Budget £m	Growth £m	Savings £m	Technical Adjustments £m	2020/21 Approved Budget £m
Service Level Breakdown					
Community Wellbeing					
Adult Social Care	88.0	5.5	(2.2)	0.0	91.3
Culture	5.1	0.0	0.0	0.0	5.1
Housing	8.8	0.5	(1.2)	0.0	8.1
Public Health	20.8	0.0	(0.8)	0.0	20.0
Total Budget	122.7	6.0	(4.2)	0.0	124.5
Children & Young People					
Children and Young People Directorate	0.3	0.0	0.0	0.0	0.3
Integration and Improved Outcomes	27.7	0.0	(1.5)	0.0	26.2
Safeguarding, Performance and strategy	18.4	0.0	(0.1)	0.0	18.3
Other School Related Budgets	(1.1)	1.8	0.0	0.0	0.7
Total Budget	45.3	1.8	(1.6)	0.0	45.5
Regeneration & Environment					
Regeneration & Environment Directorate	1.8	0.4	(0.1)	0.0	2.1
Environmental Services	31.3	1.5	(0.4)	0.0	32.4
Regeneration	0.6	0.0	(0.1)	0.0	0.5
Property	6.0	0.4	(0.2)	0.0	6.2
Total Budget	39.7	2.3	(0.8)	0.0	41.2
Customer & Digital Services					
Customer and Digital Services	0.2	1.3	0.0	0.0	1.5
ICT Client and Applications Support	5.7	0.0	0.0	0.0	5.7
Procurement	1.2	0.1	0.0	0.0	1.3
Transformation	2.8	0.2	0.0	0.0	3.0
Digital Services	10.1	0.0	0.0	0.0	10.1
Customer Services	0.0	0.3	(0.4)	0.0	(0.1)
Total Budget	20.0	1.9	(0.4)	0.0	21.5
Assistant Chief Executive					
ACE Director	0.2	0.1	0.0	0.0	0.3
Chief Executive's Office	0.5	0.0	0.0	0.0	0.5
Communications	0.4	0.1	(0.1)	0.0	0.4
Executive & Member Services	3.5	0.1	0.0	0.0	3.6
Performance Improvement	0.0	0.0	0.0	0.0	0.0
Strategy & Partnership	2.9	0.0	(0.2)	0.0	2.7
Total Budget	7.5	0.3	(0.3)	0.0	7.5
Chief Executive's Departments					
Legal, HR, Audit & Investigations	8.4	0.2	(0.1)	0.0	8.5
Finance	7.2	0.1	0.0	0.0	7.3
Total Budget	15.6	0.3	(0.1)	0.0	15.8
Total Departmental Budgets	256.0	12.6	(7.4)	0.0	256.0

Appendix B: Service Growth / Cost Pressures 2020/21

Service	Item	2020/21 £m	Comments
	Demography		
			The population projections shown below are from the GLA's annual population report.
Regeneration & Environment	Refuse Collection	0.1	0.8% growth in overall population
Regeneration & Environment	Public Realm (excluding Refuse Collection)	0.2	0.8% growth in overall population
Children & Young People	Children's social care	0.5	0.1% growth in 0-5 years; 0.6% growth in 0-25 years; 2.4% growth in 10-15 years.
Community Well Being	Learning Disabilities, Mental Health and Physical disabilities (18-65)	0.4	0.6% growth in population 18-65 years
Community Well Being	Older People (65+) Non Home Care	1.0	2.5% growth in population 65-84 years; 4.6% growth in population 85+
Community Well Being	Older People (65+) Home Care	0.6	2.5% growth in population 65-84 years; 4.6% growth in population 85+
Community Well Being	Housing - Temporary Accommodation	0.5	Projected growth in temporary accommodation costs
Resources	Customer Services	0.1	0.9% growth in population over 18
Resources	Legal services	0.1	Additional caseload caused by above, principally children's social care and adult social care.
	Total	3.5	
	Inflation		
Various	Payroll Inflation	2.1	The pay settlement for 2020/21 is expected to be 2%, which adds £2.1m to total staffing costs.
Central	Contract inflation	3.5	General contract inflation is assumed to average 2%, which will cost £3.5m each year.
Community Well Being	National Living Wage for carers	0.4	The cost of paying providers for the uplift caused by the annual increases to bring the national living wage up to 60% of median earnings by 2020 will add £0.4m to the adult social care budget each year.
	Total	6.0	
	Technical		
Central	Pension fund, Insurance and Levies	0.5	There are a set of costs associated with pensions and other related payments. The main issue is the impact of the triennial actuarial review of the pension fund, which will affect pension costs from 2020/21 onwards. The run off of the closed LPFA fund adds to this, partially offset by the ongoing gradual reduction in the number of payments for previously granted premature retirements. (Any new early retirements are met by capital contributions at the point of the decision). Also, Brent is required to contribute towards London wide levies, such as to the Environment Agency, West London Waste Authority and Lea Valley Park. These costs increase every year as the tax base increases. The total impact of these items is £0.5m, including insurance costs where the majority relates directly to the actuarial review.
	Total	0.5	
	Transport		
Adult Social Care	Freedom pass growth	0.5	The council needs to recognise unavoidable costs associated with London wide policies. The main issue here is freedom passes, the cost of which is paid for across London and redistributed according to data provided by the Oyster cards that record journeys. Given Brent's ageing demographic, and relatively good transport links, the inevitable consequence is that the costs of the scheme continue to rise locally.
Regeneration & Environment	Brent Transport Services	0.8	The Council's largest requirement for passenger transport comes from the provision of home to school transport for children and young people with Special Educational Needs (SEN) who have a statement requiring the provision of a specific type of education, normally at a special school or unit catering for their particular educational need. Where the statement identifies a need for the learner to be transported to and from school, the Authority has a statutory duty to provide the required transport. In London, the number of SEN pupils has increased by 32 per cent since 2013/14, a higher rate of growth compared to the rest of England. In Brent, passenger numbers for the last 2 years have increased by 14% and 3% respectively. The projection going forwards is that there will be an estimated 8% annual net increase in passenger numbers. £0.8m has been assumed as the need to meet the costs of demand and supply from 2020/21.
	Total	1.3	
	Social value		
Central	London Living Wage	1.5	The Council has a commitment to paying London Living Wage where possible, including enabling contractors/providers to pay their workers LLW. This has a particularly large impact on the provision of homecare, which is estimated to add £1.5m per annum to the cost of the new contract from 2020/21.
	Total	1.5	
	Capital Financing		
Central	Capital Financing	0.2	Interest and debt repayment costs for the capital programme.
	Total	0.2	
	GRAND TOTAL OF SERVICE COST / GROWTH PRESSURES	13.0	

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Appendix C (i): Summary of 2020/21 budget proposals

The table below shows a summary of the savings proposals for 2020/21 against each service area.

<u>Community Wellbeing</u>			
Index	Reference	2020/21 (£000)	Description
CWB001	Public Health re-commissioning	150	Additional efficiencies made through public health re-commissioning
CWB002	Public Health re-commissioning	500	Recommission Children's Centres and Health Visiting as a single contract
CWB003	Public Health re-commissioning	125	Cease untargeted smoking cessation. Retain only a service for mental health service users and pregnant women
CWB007	Housing – extended selective licensing	70	Proportion of the increase in License income to fund corporate overhead charge
CWB009	Additional Housing Reform: Phase 2 Temporary Accommodation reform plan	600	Increased acquisition of private sector accommodation through I4B to meet demand from homeless households and thereby avoiding cost of future TA provision
CWB010	Additional Housing Reform: First Wave Housing	250	Increased income generation through an investment in Private Sector accommodation by First Wave, let at market rates
CWB013	New Accommodation for Independent Living (NAIL)	2,000	Increasing NAIL provision to support more users, but also developing provision to support higher need users and support some users who would have gone into nursing care. Proposed to be re-profiled to 2021/22.
CWB015/16/17/18	Adult Social Care re-commissioning	250	Review of homecare and placement packages, re-commissioning day care
CWB021	Housing Association Lease Scheme	300	Proposed to introduce a Reasonable Rents policy
Total		4,245	

<u>Regeneration & Environment</u>			
Index	Reference	2020/21 (£000)	Description
R&E001	Dimming street lights	100	The LED Street Lighting CMS provides the Council with the ability to adjust LED lighting output to create additional savings by further reducing both energy costs and carbon emissions
R&E004	Building control	35	The generation of additional income by the Building Control team
R&E008	Wembley licensing	50	Potential increase in revenue arising from increased activity in Wembley
R&E018	Regeneration & Environment staffing efficiencies	450	Review of staffing model in Regeneration & Environment
RES012	Property	200	It is proposed to review all existing leases and other income raised with a view to generating additional income
Total		835	

<u>Children & Young People</u>			
Index	Reference	2020/21 (£000)	Description
CYP004	WLA Shared Fostering Service	100	Develop a shared fostering service with other WLA boroughs, resulting in staffing efficiencies
CYP008	Children's centres	1,491	Develop family hubs from children's centres
Total		1,591	

<u>Assistant Chief Executive</u>			
Index	Reference	2020/21 (£000)	Description
PPP001	Reducing voluntary sector grants	158	Proposed to reduce grants provided to three voluntary sector bodies
PPP003	Restructure of communications, conference & events department	100	It is proposed to restructure the communications, conference & events functions in 2020/21 to realign services to enable the team to maximise income generation opportunities while focusing more tightly on core corporate communications priorities only
Total		258	

<u>Customer & Digital Services</u>			
Index	Reference	2020/21 (£000)	Description
RES003/04/05	Customer services	425	Service modernisation- more digital services and demand management, revised operating model for managing access for all services, streamlining of structures following return of Council Tax in house.
Total		425	

<u>Legal, Human Resources, Audit & Investigations</u>			
Index	Reference	2020/21 (£000)	Description
RES001	Legal savings - Demand management	50	Savings to recognise the impact of the Impower demand management review, income generation and bringing more work in house which will lead to less spend on external legal counsel
Total		50	

Grand Total	7,404	

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Appendix C (ii) Summary of 2021/22 - 2022/23 budget proposals

Reference	Department	Description	Theme	Amount (£000)	2021/22 (£000)	2022/23 (£000)
2021-23 CWB 001	Community Wellbeing	Reablement	Service Transformation	580	460	120
2021-23 CWB 003	Community Wellbeing	Placement Review	Making our money go further	250	250	0
2021-23 CWB 004	Community Wellbeing	Deprivation of Liberty Safeguards (DoLS) provision	Making our money go further	30	30	0
2021-23 CWB 005	Community Wellbeing	Community Care recommissioning	Making our money go further	750	750	0
2021-23 CWB 006	Community Wellbeing	Properties to relieve Temporary Accommodation	Making our money go further	1990	1430	560
Sub Total				3,600	2,920	680
2021-23 CYP 001	Children & Young People	Clawback of unused Direct Payments	Service Transformation	25	25	0
2021-23 CYP 002	Children & Young People	Short Breaks Centre	Income generation	50	50	0
2021-23 CYP 003	Children & Young People	Adjusting resources in demand led budgets	Service Transformation	150	150	0
2021-23 CYP 004	Children & Young People	Review and zero base other service area budgets	Making our money go further	100	100	0
2021-23 CYP 005	Children & Young People	Increased income target for the Gordon Brown Centre	Income generation	50	50	0
2021-23 CYP 006	Children & Young People	10% saving on commissioning	Making our money go further	50	50	0
Sub Total				425	425	0
2021-23 R&E 001	Regeneration & Environment	General Efficiencies across R&E	Service Transformation	215	215	0
2021-23 R&E 002	Regeneration & Environment	Lighting Maintenance	Making our money go further	140	140	0
2021-23 R&E 003	Regeneration & Environment	Schemes/Drainage fees	Income generation	100	100	0
2021-23 R&E 004	Regeneration & Environment	Damage Cost Recovery	Income generation	50	0	50
2021-23 R&E 005	Regeneration & Environment	Building Control Fees Review	Income generation	50	50	0
2021-23 R&E 006	Regeneration & Environment	Brent Transport Services move	Service Transformation	150	0	150
2021-23 R&E 007	Regeneration & Environment	Pre-app service; review basic and enhanced offer	Income generation	5	5	0
2021-23 R&E 009	Regeneration & Environment	Apprenticeship levy commercial offer	Income generation	45	15	30
2021-23 R&E 011	Regeneration & Environment	Facilities Management contract review	Making our money go further	70	70	0
Sub Total				825	595	230
2021-23 CDS 001	Customer & Digital Services	ICT Client and Application support - Income generation	Income generation	80	80	0
2021-23 CDS 003	Customer & Digital Services	ICT Client and Application support - Printing Costs	Making our money go further	40	40	0
2021-23 CDS 004	Customer & Digital Services	ICT Client and Application support - Salaries	Service Transformation	160	0	160
2021-23 CDS 005	Customer & Digital Services	ICT Client and Application support - Oracle changes budget	Service Transformation	20	20	0
2021-23 CDS 006	Customer & Digital Services	Merger of Housing and BCS contact centre	Service Transformation	100	50	50
2021-23 CDS 007	Customer & Digital Services	Reduction in Postal Costs	Service Transformation	30	0	30
2021-23 CDS 008	Customer & Digital Services	Savings from new Council Tax Support scheme	Service Transformation	50	50	0
2021-23 CDS 009	Customer & Digital Services	Increased automation in Customer Services	Service Transformation	100	50	50
2021-23 CDS 010	Customer & Digital Services	Replace IEG (on line benefits form)	Service Transformation	75	0	75
2021-23 CDS 011	Customer & Digital Services	Staffing efficiencies in Customer Services	Service Transformation	145	50	95
2021-23 CDS 012	Customer & Digital Services	Transformation - Staffing efficiencies	Service Transformation	100	0	100
Sub Total				900	340	560
2021-23 CE 001	Chief Executive	Efficiency savings within Legal, HR, Audit & Investigations	Making our money go further	100	0	100
2021-23 CE 002	Chief Executive	Efficiency savings within Finance	Making our money go further	100	0	100
2021-23 CE 003	Chief Executive	Efficiency savings within Assistant Chief Executive	Making our money go further	100	0	100
Sub Total				300	0	300
Grant Total				6,050	4,280	1,770

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Appendix C (iii): Detailed budget templates for 2021/22 - 2022/23 proposals

This appendix contains the detailed budget templates for each of the savings proposals that are to be taken forward by way of this Cabinet report.

<u>Community Wellbeing</u>		
Reference	Description	Page no.
2021-23 CWB 001	Reablement	3
2021-23 CWB 003	Placement Review	6
2021-23 CWB 004	Deprivation of Liberty Safeguards (DoLS) provision	8
2021-23 CWB 005	Community Care recommissioning	11
2021-23 CWB 006	Properties to relieve Temporary Accommodation	14
<u>Children & Young People</u>		
Reference	Description	Page no.
2021-23 CYP 001	Clawback of unused Direct Payments	16
2021-23 CYP 002	Short Breaks Centre	18
2021-23 CYP 003	Adjusting resources in demand led budgets	20
2021-23 CYP 004	Review and zero base other service area budgets	22
2021-23 CYP 005	Increased income target for the Gordon Brown Centre	24
2021-23 CYP 006	10% saving on commissioning	26
<u>Regeneration & Environment</u>		
Reference	Description	Page no.
2021-23 R&E 001	General Efficiencies across R&E	28
2021-23 R&E 002	Lighting Maintenance	30
2021-23 R&E 003	Schemes/Drainage fees	32
2021-23 R&E 004	Damage Cost Recovery	34
2021-23 R&E 005	Building Control Fees Review	36
2021-23 R&E 006	Brent Transport Services move	38
2021-23 R&E 007	Pre-app service; review basic and enhanced offer	40
2021-23 R&E 009	Apprenticeship levy commercial offer	42
2021-23 R&E 011	Facilities Management contract review	45
<u>Customer & Digital Services</u>		
Reference	Description	Page no.
2021-23 CDS 001/2	ICT Client and Application support - Income generation	47
2021-23 CDS 003/5	ICT Client and Application support - Printing Costs & Oracle changes budget	49
2021-23 CDS 004	ICT Client and Application support - Salaries	51
2021-23 CDS 006	Merger of Housing and BCS contact centre	53
2021-23 CDS 007	Reduction in Postal Costs	55
2021-23 CDS 008	Savings from new Council Tax Support scheme	57
2021-23 CDS 009	Increased automation in Customer Services	59

2021-23 CDS 010	Replace IEG (on line benefits form)	61
2021-23 CDS 011	Staffing efficiencies in Customer Services	64
2021-23 CDS 012	Transformation - Staffing efficiencies	67
<u>Chief Executive's Department</u>		
Reference	Description	Page no.
2021-23 CE 001/2/3	Efficiency savings within Legal, HR, Audit & Investigations/Finance/ Assistant Chief Executive	69

Budget Options Information

Reference:	2021-23 CWB 001
Service(s):	Reablement
Lead Member(s):	Cllr Farah

Savings Proposals:	Delivering the outcomes of the project by Newton Europe. The outcome of the project was that through increased number of people going through reablement, better quality reablement and clearer pathways, the cost of ongoing packages of care could be minimised. A further savings amount has been identified through reducing the contribution that the local authority makes to the rehab (health) element of the service.

Financial and Staffing Information

2019/20	
Total budget for the service(s) £'000:	1,500
Total post numbers in the services(s) (FTE):	0

	2021/22	2022/23
	£'000	£'000
Proposed saving:	460	120
	FTE	FTE
Proposed staffing reduction		

Proposed savings

A total of £580k savings have been identified. This is a combination of a £160k reduction in the contribution of costs the local authority currently makes towards the management fee of the health (rehab) element of the integrated Rehab and Reablement Service, and £420k of savings through better quality and increased volume of people going through the reablement service, thus minimising the cost of ongoing care.

How would this affect users of this service?

This would be an increase in service, so there is no impact on current users. The impact would be positive as the quality of service would be better and more people would be eligible to be supported to become more independent.

Key milestones

Project work has already begun, with three workstreams supporting the proposed improvements made by Newton Europe. Further work specifically around the IRRS element of the service will be accelerated by appointing a short term project manager to enable the delivery of savings more quickly.

Work is happening to identify and appoint a project manager.

PM in place by Dec 2019

Full project plan completed by end of Jan 2020

Implementation begins by April 2020

Discussion with health colleagues regarding the management contribution to IRRS have started. Delivery of reduction in contribution by April 2020.

Key consultations

Ongoing consultation with staff has started and will continue. Staff are key to redesigning the new service. No formal consultation is required.

Key risks and mitigations

Risk in the pace of delivery not being quick enough without appropriate project management resources being appointed – mitigation is early recruitment and interviewing for PM.

Risk in the quality of rehabilitation services not improving as quickly as desired due to aligned work to bring rehabilitation services in house. This would be mitigated through a clear project plan, a communications plan and ownership of the project by the Project Manager and Heads of Service.

Equality impact screening

Is there potential for the proposed saving to have a disproportionate adverse impact on any of the following groups:	
Disabled people	N
Particular ethnic groups	N
Men or Women (include impacts due to pregnancy/maternity)	N
People of particular sexual orientation/s	N
People who are proposing to undergo, are undergoing or have undergone a process or part of a process of gender reassignment	N
People in particular age groups	N
Groups with particular faiths/beliefs	N
Marriage / civil partnership	N

If the screening has identified a potentially disproportionate adverse impact, you will need to complete an Equality Impact Assessment.

EIA required?:	No
EIA to be completed by:	N/A
Deadline:	N/A
Lead officer for this proposal:	Sunny Mehmi, Head of Adult Services

Budget Options Information

Reference:	2021-23 CWB 003
Service(s):	Placement Review
Lead Member(s):	Cllr Farah

Savings Proposals:	Continuing robust challenge of individual package costs based on evidence as part of annual placement reviews.

Financial and Staffing Information

2019/20	
Total budget for the service(s) £'000:	22,000
Total post numbers in the services(s) (FTE):	0

	2021/2022	2022/23
	£'000	£'000
Proposed saving:	250	0
	FTE	FTE
Proposed staffing reduction	0	0

Proposed savings

There are currently c. 180 placement care packages over £1,000 on Mosaic. A number of these packages will be reviewed as part of the NAIL programme but a small proportion will continue to require a Residential Care placement where a price negotiation may be possible.

How would this affect users of this service?

Negotiation of price of placement will have no impact on service users.

Key milestones

The Residential and Nursing Commissioning Team are set up to review placements on an annual basis. They have a clear annual work programme, which includes priority allocation of cases above £1,000 per week.

Key consultations

None required.

Key risks and mitigations

Risk that with the move of less complex packages into NAIL provision, the people left in placements are higher acuity and therefore the scope to reduce costs of packages will be less.

Risks are mitigated through robust examination of all provider costs and challenge, as well as development of Supplier Relationship Manager posts in the Commissioning Team to support market development and improve relationships with providers.

Equality impact screening

Is there potential for the proposed saving to have a disproportionate adverse impact on any of the following groups:	
Disabled people	N
Particular ethnic groups	N
Men or Women (include impacts due to pregnancy/maternity)	N
People of particular sexual orientation/s	N
People who are proposing to undergo, are undergoing or have undergone a process or part of a process of gender reassignment	N
People in particular age groups	N
Groups with particular faiths/beliefs	N
Marriage / civil partnership	N

If the screening has identified a potentially disproportionate adverse impact, you will need to complete an Equality Impact Assessment.

EIA required?:	No
EIA to be completed by:	N/A
Deadline:	N/A

Lead officer for this proposal:	Andrew Davies, Head of Commissioning, Contracting and Market Management

Budget Options Information

Reference:	2021-23 CWB 004
Service(s):	Review of Deprivation of Liberty Safeguards (DoLS) provision
Lead Member(s):	Cllr Farah

Savings Proposals:	BIA (Best Interest Assessor) assessments could be done internally; cost savings based on options including payment to staff vs external BIAs.

Financial and Staffing Information

2019/20	
Total budget for the service(s) £'000:	171
Total post numbers in the services(s) (FTE):	0

	2021/22	2022/23
	£'000	£'000
Proposed saving:	30	0
	FTE	FTE
Proposed staffing reduction		

Proposed savings

The Deprivation of Liberty Safeguards requires six assessments to be undertaken on each case. In Brent, three of these are commissioned to an external Section 12 Doctor, while the remaining three are commissioned to an external Best Interest Assessors (BIA). This is because existing social workers, employed by the Council and who have BIA training, could not complete the required DoLS assessments in addition to their substantive caseloads.

The current remuneration to external BIAs is approximately £250.00 per assessments, with some variation due to travel or location outside of London. Section 12 Doctors are not employed by the Council and our insurance / liability makes employing a medical professional directly not viable; the only alternative is with the shift to Liberty Protection Safeguards (LPS), CCGs / Hospitals would also be utilising S12 Doctors and could be employed directly by our health partners that we could use through S75 agreement or joint commissioning, at a potential reduced rate to current.

2017-2018	662 BIAs commissioned	72.2% of all DoLS requested
2018-2019	687 BIAs commissioned	72.85% of all DoLS requested
2019-2020	670 BIAs Estimated based on Q1 figures	

Not all DoLS received progress, which may be due to death, change of plan or circumstance, or evidence that the person has regained capacity.

Current spend is £171,000 for commissioning of BIAs.

Brent Council previously invested in staff to undertake training as a best interest assessor. These courses are accredited and cost approximately £1,550 for a five-day course. Brent currently have a very limited pool of practitioners trained to undertake this role as follows: 3 social workers, 2 safeguarding adults managers, and two team managers. Many staff who previously undertook are no longer believed to be working in Brent.

In order to commission a sufficient pool of individuals to undertake these assessments, while reducing impact on current caseloads, it is envisioned 14 BIAs would be required to be in place, undertaking three to four assessments per month.

How would this affect users of this service?

The proposal would have no impact on service users.

Key milestones

- Consultation with teams and management
- Change of JD /PS to be inclusive of this activity
- Management of caseloads more formally to ensure ability to undertake assessments in line with other duties in the team
- Cases allocated as part of regular case allocation (not on top of team's case allocation)
- Review of current capacity in teams and resource modelling, which would need to happen in line with Transformation Customer Journey work stream timeframe.
- Build in role conversion to Approved Mental Capacity Practitioner (Liberty of Protection Safeguards Oct 2020) and training costs

Key consultations

Consultation with Staff, Unions and HR to amend JDs for BIA trained staff.

Key risks and mitigations

Having to train new staff due to workforce movement means that it is expected on an annual basis funding is needed to ensure up to 10 more staff are trained. This equates to an additional £15,500 from the current training budget committed for this area.

Equality impact screening

Is there potential for the proposed saving to have a disproportionate adverse impact on any of the following groups:	
Disabled people	N
Particular ethnic groups	N
Men or Women (include impacts due to pregnancy/maternity)	N
People of particular sexual orientation/s	N
People who are proposing to undergo, are undergoing or have undergone a process or part of a process of gender reassignment	N
People in particular age groups	N
Groups with particular faiths/beliefs	N
Marriage / civil partnership	N

If the screening has identified a potentially disproportionate adverse impact, you will need to complete an Equality Impact Assessment.

EIA required?:	No
EIA to be completed by:	N/A
Deadline:	N/A

Lead officer for this proposal:	Georgina Diba, Head of Safeguarding and Transformation

Budget Options Information

Reference:	2021-23 CWB 005
Service(s):	Community Care Recommissioning
Lead Member(s):	Cllr Farah

Savings Proposals:	Recommissioning all external day care provision, restructuring provision into a new, lower cost model and inclusion of Public Health outcomes into a new model of delivery.

Financial and Staffing Information

2019/20	
Total budget for the service(s) £'000:	2,600
Total post numbers in the services(s) (FTE):	0

	2021/22	2022/23
	£'000	£'000
Proposed saving:	750	0
	FTE	FTE
Proposed staffing reduction		

Proposed savings

Current externally commissioned day care in Brent is commissioned according to an old fashioned and out of date model. The majority of provision is expensive, building based and does not offer choice and control to service users. Additionally, there is an over provision of traditional day care in Brent, meaning that providers are not transforming their services, and often wish to increase their costs to the Council to make up for low take up of their services.

The commissioning service are working with providers to redesign the service into a new model, that supports more choice and control and promotes less building based provision.

Public Health outcomes will be built into the recommissioned service.

How would this affect users of this service?

The proposal is not to cut services or to reduce the amount of provision that individuals receive, but rather to transform the existing provision so that it is more efficient and cost effective.

Users may be impacted through having to move to a different service provider, or adapting to a different form of non-building based provision, but the overall level of service individuals receive should stay the same in most cases. Although some people may find that transition challenging, a more innovative approach to day service should deliver better outcomes.

Key milestones

- Data collection and analysis – Nov 2019
- Development of different models of day care for market engagement – March 2020
- Market engagement and user feedback June 2020
- Re-procurement of services – Sept 2020

Key consultations

If the new models determine that some existing day service should be de-commissioned, providers will need to be consulted with through the de-commissioning and procurement process. Individuals receiving service and their families will need to be reviewed on an individual basis and will be consulted through this route. We will seek some user engagement and feedback regarding the proposed model, but formal consultation is not required.

Key risks and mitigations

There is a risk that providers will not wish to move to a more innovative service model, or will struggle to deliver services in a different way. The risk will be mitigated through market engagement and market warming, and working with providers to redesign the model.

Equality impact screening

Is there potential for the proposed saving to have a disproportionate adverse impact on any of the following groups:	
Disabled people	N
Particular ethnic groups	N
Men or Women (include impacts due to pregnancy/maternity)	N
People of particular sexual orientation/s	N
People who are proposing to undergo, are undergoing or have undergone a process or part of a process of gender reassignment	N
People in particular age groups	N

Groups with particular faiths/beliefs	N
Marriage / civil partnership	N

If the screening has identified a potentially disproportionate adverse impact, you will need to complete an Equality Impact Assessment.

EIA required?:	No
EIA to be completed by:	N/A
Deadline:	N/A

Lead officer for this proposal:	Andrew Davies, Head of Commissioning, Contracting and Market Management

Budget Options Information

Reference:	2021-23 CWB 006
Service(s):	Housing General Fund
Lead Member(s):	Cllr Southwood
Savings Proposals:	Additional properties obtained which reduce demand for Temporary Accommodation.

Financial and Staffing Information

2019/20	
Total budget for the service(s) £'000:	13,090
Total post numbers in the services(s) (FTE):	163

	2021/22	2022/23
	£'000	£'000
Proposed saving:	1,430	560
	FTE	FTE
Proposed staffing reduction	-	-

Proposed savings

Additional housing stock is expected to become available through the Council New Build programme, which can be used to provide permanent properties for a significant number of those currently in Temporary Accommodation (TA).

Knowles House will also provide in-house TA once redevelopment has been completed, reducing the costs of obtaining accommodation from external providers.

How would this affect users of this service?

These plans will improve the quality of TA and reduce the numbers of households residing in TA, providing improved outcomes for all those affected.

Key milestones

Acquisition of housing through the Council New Build Programme.

Completion of the redevelopment of Knowles House.

Key consultations

None.

Key risks and mitigations

Delays in the acquisition of additional housing stock or redevelopment of Knowles House will impact on the ability to achieve these savings.

Risk can be mitigated through closely monitoring housing stock acquired against target. Other forecast changes, such as Capital Letters leading to greater numbers of suitable properties being found for those in Temporary Accommodation will also assist in reducing demand.

Equality impact screening

Is there potential for the proposed saving to have a disproportionate adverse impact on any of the following groups:	
Disabled people	N
Particular ethnic groups	N
Men or Women (include impacts due to pregnancy/maternity)	N
People of particular sexual orientation/s	N
People who are proposing to undergo, are undergoing or have undergone a process or part of a process of gender reassignment	N
People in particular age groups	N
Groups with particular faiths/beliefs	N
Marriage / civil partnership	N

If the screening has identified a potentially disproportionate adverse impact, you will need to complete an Equality Impact Assessment.

EIA required?:	N
EIA to be completed by:	N/A
Deadline:	N/A

Lead officer for this proposal:	Hakeem Osinaike, Operational Director Housing

Budget Options Information

Reference:	2021-23 CYP 001
Service(s):	Localities
Lead Member(s):	Cllr Patel

Savings Proposals:	CWD – Clawback of unused Direct Payments

Financial and Staffing Information

2019/20	
Total budget for the service(s) £'000:	500
Total post numbers in the services(s) (FTE):	0

	2021/22	2022/23
	£'000	£'000
Proposed saving:	25	0
	FTE	FTE
Proposed staffing reduction	0	0

Proposed savings

Implementation of card payments for Direct Payment clients means the service will be able to reclaim unused or overpaid funds immediately, using the same approach taken within Adult Social Care. For a variety of reasons direct payments may no longer be required by a family for the purposes of supporting their child. At present there is a risk that payments can continue for several months before they are amended. The card system will allow officers to identify overpayments and reclaim these rapidly.

CWD Direct Payments value £500k per year. A 5% clawback rate would equal £25K.

How would this affect users of this service?

Payments to families and clawbacks from overpaid accounts will happen much more rapidly. Families will not be able to retain funds to which they are not entitled.

Key milestones

Payment cards have been distributed to families and consultation with parents on the use of cards has happened.

- Letter confirming the details of the scheme to be sent out in October 2019.
- Fully implement the payment by card scheme in January 2020.
- Measure impact during 2020/21.
- Reduce budget in advance of 2021/22 based on evidence from implementation.

Key consultations

Consultation with families who receive DPs has happened.
Consultation with Brent Parent Carer Forum has happened.

Key risks and mitigations

Team have not yet tested if the 5% represents a realistic amount of clawback. There could be scope to clawback greater amounts. There is also a risk that the clawback could be less than 5% but based on current analysis of DPs this seems unlikely.

Equality impact screening

There is no proposal to reduce the level of direct payments being offered to families.

Is there potential for the proposed saving to have a disproportionate adverse impact on any of the following groups:	
Disabled people	N
Particular ethnic groups	N
Men or Women (include impacts due to pregnancy/maternity)	N
People of particular sexual orientation/s	N
People who are proposing to undergo, are undergoing or have undergone a process or part of a process of gender reassignment	N
People in particular age groups	N
Groups with particular faiths/beliefs	N
Marriage / civil partnership	N

If the screening has identified a potentially disproportionate adverse impact, you will need to complete an Equality Impact Assessment.

EIA required?:	No
EIA to be completed by:	N/A
Deadline:	N/A

Lead officer for this proposal:	Stephen Gordon, Head of Service Localities

Budget Options Information

Reference:	2021-23 CYP002
Service(s):	Localities
Lead Member(s):	Cllr Patel

Savings Proposals:	Short Breaks Centre Use available capacity to sell additional respite beds/nights to neighbouring authorities at market rates.

Financial and Staffing Information

2019/20	
Total budget for the service(s) £'000:	575
Total post numbers in the services(s) (FTE):	0

	2021/22	2022/23
	£'000	£'000
Proposed saving:	50	0
	FTE	FTE
Proposed staffing reduction	0	0

Proposed savings

It is proposed that existing spare capacity of respite beds/nights at the Ade Adepitan Short Breaks Centre (SBC) will be sold to neighbouring authorities at market rates. The intention is to sell the beds at £730 per night for planned stays and £910 for emergency bookings. Selling the nights will reduce voids at relatively low marginal cost as payments for the management, building and other operational costs are met from within the existing budget.

How would this affect users of this service?

There should be a minimal impact on users of the service. The sale of extra bed nights would bring more users to the centre but as long as this is managed sensitively then it could bring some social benefits to existing users. There is no intention to reduce opportunities for Brent resident children and young people to use the SBC – the proposal is to better utilise existing capacity that is not required by the service.

Key milestones

Publicise the option to buy bed nights. The Localities service has been in contact with LB Barnet and LB Ealing to offer these services. LB Barnet has already purchased additional bed nights and is due to sign a formal contract to regularise arrangements before the end of 2019.

Key consultations

Consultation with service users, their families and the Brent Parent Carer Forum has been carried out with positive feedback obtained.

Key risks and mitigations

- There could be a risk of Brent young people not being able to access this service if too many bed nights are sold.
- Mitigation: The present proposal does not involve any reduction in services for Brent young people. There is currently surplus capacity and some bed nights are already sold to neighbouring boroughs

Equality impact screening

There is no proposal to reduce services to our users.

Is there potential for the proposed saving to have a disproportionate adverse impact on any of the following groups:	
Disabled people	No
Particular ethnic groups	No
Men or Women (include impacts due to pregnancy/maternity)	No
People of particular sexual orientation/s	No
People who are proposing to undergo, are undergoing or have undergone a process or part of a process of gender reassignment	No
People in particular age groups	No
Groups with particular faiths/beliefs	No
Marriage / civil partnership	No

If the screening has identified a potentially disproportionate adverse impact, you will need to complete an Equality Impact Assessment.

EIA required?:	No
EIA to be completed by:	N/A
Deadline:	N/A

Lead officer for this proposal:	Stephen Gordon, Head of Service Localities

Budget Options Information

Reference:	2021-23 CYP003
Service(s):	LAC and Permanency
Lead Member(s):	Cllr Patel

Savings Proposals:	Adjusting resources in demand led budgets

Financial and Staffing Information

2019/20	
Total budget for the service(s) £'000:	2,931
Total post numbers in the services(s) (FTE):	43

	2021/22	2022/23
	£'000	£'000
Proposed saving:	150	
	FTE	FTE
	Equivalent to 3 FTE	

Proposed savings

The rate of Looked After Children per 10,000 of population is historically low in Brent and the current rate is low when compared to statistical neighbours. Although with expected population growth this number is likely to increase, it should however be in line with the current statistical measure. With the assumption that this low rate continues over the next 18 months a reduction in the budget in line with posts currently being held vacant could be implemented to align resource to demand.

How would this affect users of this service?

If the rate of LAC remains as it is currently then it is anticipated that a resource reduction could be achieved without a major negative impact upon looked after children and care leavers.

Key milestones

Quarterly monitoring of LAC numbers within existing performance reports will be reviewed to consider whether current levels remain stable. A decision would need to

be made by the service by early 2021 regarding the resource required to meet demand for the subsequent two financial years.

Key consultations

Lead Member will be kept regularly informed and service users and staff will be kept regularly informed and their views sought.

Key risks and mitigations

- Risk that caseloads will rise, particularly as demographic changes increase the number of Secondary age children. (65% of current LAC are 13+). Risk that continuing complexity of need accelerates due to issues regarding contextual safeguarding and serious youth violence.
- Population growth is expected to stabilise following the current primary bulge moving through the school system. A number of activities as set out in the current borough plan are intended to improve outcomes and manage risk effectively for target groups at higher risk of becoming looked after.

Equality impact screening

Is there potential for the proposed saving to have a disproportionate adverse impact on any of the following groups:	
Disabled people	N
Particular ethnic groups	N
Men or Women (include impacts due to pregnancy/maternity)	N
People of particular sexual orientation/s	N
People who are proposing to undergo, are undergoing or have undergone a process or part of a process of gender reassignment	N
People in particular age groups	N
Groups with particular faiths/beliefs	N
Marriage / civil partnership	N

If the screening has identified a potentially disproportionate adverse impact, you will need to complete an Equality Impact Assessment.

EIA required?:	No
EIA to be completed by:	N/A
Deadline:	N/A

Lead officer for this proposal:	Onder Beter, Head of Service Looked After Children and Permanency

Budget Options Information

Reference:	2021-23 CYP004
Service(s):	CYP Cross Service
Lead Member(s):	Cllr Patel

Savings Proposals:	Review and zero base other CYP service area budgets

Financial and Staffing Information

2019/20	
Total budget for the service(s) £'000:	Approx. £5M of non-staffing and non-frontline service budgets.
Total post numbers in the services(s) (FTE):	0

	2021/22	2022/23
	£'000	£'000
Proposed saving:	100	
	FTE	FTE
Proposed staffing reduction	0	

Proposed savings

Review and zero base other service area budgets to achieve and accumulate minor savings.

To achieve the saving a budget analysis will be carried out on non-staff and non-frontline service budgets across CYP. Management will then challenge budget holders to produce updated service delivery plans focussed on outcomes which can be costed by the finance team.

The exercise will concentrate on those budgets which have historically underspent or which represent discretionary spend. For example;

1. The CYP Learning and Development budget is centralised in the SQA service area, and has underspent in recent years. A costed plan could be designed to meet key requirements, such as ensuring Continuous Professional Development for social workers, and deliver a saving.

2. Eliminate recently unused budgets such as the £23k 'family conference budget'.

How would this affect users of this service?

There would be no impact on users of the CYP service.

Key milestones

- The zero basing exercise will be timetabled through the autumn and winter of 2019/20, taking each service area in turn, to conclude by March 2020.
- Launch of new 2021/22 Learning and Development offer April 2021

Key consultations

Consultations with staff on L and D offer by December 2020

Key risks and mitigations

All relatively minor underspends have historically been used towards covering other demand led budget pressures.

Equality impact screening

Is there potential for the proposed saving to have a disproportionate adverse impact on any of the following groups:	
Disabled people	No
Particular ethnic groups	No
Men or Women (include impacts due to pregnancy/maternity)	No
People of particular sexual orientation/s	No
People who are proposing to undergo, are undergoing or have undergone a process or part of a process of gender reassignment	No
People in particular age groups	No
Groups with particular faiths/beliefs	No
Marriage / civil partnership	No

If the screening has identified a potentially disproportionate adverse impact, you will need to complete an Equality Impact Assessment.

EIA required?:	No.
EIA to be completed by:	N/A
Deadline:	N/A

Lead officer for this proposal:	Brian Grady, Operational Director Safeguarding, Partnerships and Strategy

Budget Options Information

Reference:	2021-23 CYP005
Service(s):	Setting and School Effectiveness
Lead Member(s):	Cllr Patel

Savings Proposals:	Increased income target for the Gordon Brown Centre

Financial and Staffing Information

2019/20	
Total budget for the service(s) £'000:	0
Total post numbers in the services(s) (FTE):	3

	2021/22	2022/23
	£'000	£'000
Proposed saving:	50	
	FTE	FTE
Proposed staffing reduction	0	

Proposed savings

Increased income target for the Gordon Brown Centre. The Centre has benefitted from recent capital investment, and successful summer trading in 2019 indicates a forecast surplus of £50k against the current net zero budget.

How would this affect users of this service?

There is no identified impact to users of the service from this proposal

Key milestones

The planned income generation from the selling of daytime and residential activity bookings will be reviewed quarterly through 2019/20 and into 20/21

Key consultations

No consultations are required.

Key risks and mitigations

There is a risk that traded business in daytime and residential activity bookings deteriorates. This risk will be mitigated by proactive marketing of the offer of the Centre, in particular to Brent schools.

Equality impact screening

Is there potential for the proposed saving to have a disproportionate adverse impact on any of the following groups:	
Disabled people	N
Particular ethnic groups	N
Men or Women (include impacts due to pregnancy/maternity)	N
People of particular sexual orientation/s	N
People who are proposing to undergo, are undergoing or have undergone a process or part of a process of gender reassignment	N
People in particular age groups	N
Groups with particular faiths/beliefs	N
Marriage / civil partnership	N

If the screening has identified a potentially disproportionate adverse impact, you will need to complete an Equality Impact Assessment.

EIA required?:	No
EIA to be completed by:	N/A
Deadline:	N/A

Lead officer for this proposal:	John Galligan, Head of Setting and School Effectiveness

Budget Options Information

Reference:	2021-23 CYP006
Service(s):	PPP
Lead Member(s):	Cllr Patel
Savings Proposals:	10% saving on CYP commissioning

Financial and Staffing Information

2019/20	
Total budget for the service(s) £'000:	500
Total post numbers in the services(s) (FTE):	0

	2021/22	2022/23
	£'000	£'000
Proposed saving:	50	
	FTE	FTE
Proposed staffing reduction	0	

Proposed savings

10% saving on commissioning when contracts become due. The CYP procurement forward plan identifies a number of contracts which are due to go out to tender for new contracts to commence for April 2021, including for Speech and Language Therapy services and Mental Health and Wellbeing services.

How would this affect users of this service?

Effective market competition and review of service delivery alongside CCG commissioned services will ensure service delivery efficiencies are identified without impacting on the users of the services.

Key milestones

Indicative milestones for procurement activity are as follows:

- Consultation with children and parents/carers on service specifications to be completed by July 2020
- Market testing and market development to be completed by September 2020

- Procurement activity to commence October 2020
- Contract award by end of January 2021
- New contracts commence by end March 2021

Key consultations

Consultation with children and parents/carers on service specifications will be completed by July 2020

Key risks and mitigations

Achievement of this savings target will depend on the demand for services and design of the procurement activity. Price will need to be a significant factor in that exercise.

Equality impact screening

Is there potential for the proposed saving to have a disproportionate adverse impact on any of the following groups:	
Disabled people	N
Particular ethnic groups	N
Men or Women (include impacts due to pregnancy/maternity)	N
People of particular sexual orientation/s	N
People who are proposing to undergo, are undergoing or have undergone a process or part of a process of gender reassignment	N
People in particular age groups	N
Groups with particular faiths/beliefs	N
Marriage / civil partnership	N

If the screening has identified a potentially disproportionate adverse impact, you will need to complete an Equality Impact Assessment.

EIA required?:	No
EIA to be completed by:	N/A
Deadline:	N/A

Lead officer for this proposal:	Shirley Parks, Head of Service PPP

Budget Options Information

Reference:	2021-23 R&E 001
Service(s):	Environmental Services
Lead Member(s):	Cllr Sheth

Savings Proposals:	General Efficiencies across the Environmental Services Directorate

Financial and Staffing Information

2019/20	
Total budget for the service(s) £'000:	£33,235
Total post numbers in the services(s) (FTE):	245

	2021/22	2022/23
	£'000	£'000
Proposed saving:	215	0
	FTE	FTE
Proposed staffing reduction:	N/A	N/A

Proposed savings

A review of the current budget forecasts across the department to identify recurring underspends.

How would this affect users of this service?

This exercise is intended to remove funds that have been deemed to be surplus to the structural revenue requirement of the directorate and so their removal would have no adverse operational impact.

Key milestones

A review of underspends to identify those that are recurring and so permanently surplus to operational requirements.

Key consultations

Budget holders.

Key risks and mitigations

None

Equality impact screening

Is there potential for the proposed saving to have a disproportionate adverse impact on any of the following groups:	
Disabled people	N
Particular ethnic groups	N
Men or Women (include impacts due to pregnancy/maternity)	N
People of particular sexual orientation/s	N
People who are proposing to undergo, are undergoing or have undergone a process or part of a process of gender reassignment	N
People in particular age groups	N
Groups with particular faiths/beliefs	N
Marriage / civil partnership	N

If the screening has identified a potentially disproportionate adverse impact, you will need to complete an Equality Impact Assessment.

EIA required?:	N
EIA to be completed by:	N/A
Deadline:	N/A

Lead officer for this proposal:	Chris Whyte, Operational Director, Environmental Services

Budget Options Information

Reference:	2021-23 R&E 002
Service(s):	Parking and Street Lighting
Lead Member(s):	Cllr Sheth

Savings Proposals:	10% efficiency saving from new lighting maintenance contract

Financial and Staffing Information

2019/20	
Total budget for the service(s) £'000:	£1,390 (Lighting Maintenance Contract)
Total post numbers in the services (FTE):	3

	2021/22	2022/23
	£'000	£'000
Proposed saving:	140	0
	FTE	FTE
Proposed staffing reduction:	0	0

Proposed savings

A 10% efficiency saving should be achievable following the end of the 20 year PFI contract and bedding in of the new contract. This saving is in line with expectations of other procurement exercises.

How would this affect users of this service?

Achievable, provided capital provision for the new column replacement programme is made from December 2023

Key milestones

Completion of all outstanding 1997-2021 column replacements by March 2021.

Key consultations

N/A

Key risks and mitigations

Completion of outstanding column replacements by March 2021 will minimise risk. In addition, a fresh 20-year column replacement programme needs to be initiated from December 2023, funded preferably from capital resources.

Equality impact screening

Is there potential for the proposed saving to have a disproportionate adverse impact on any of the following groups:	
Disabled people	N
Particular ethnic groups	N
Men or Women (include impacts due to pregnancy/maternity)	N
People of particular sexual orientation/s	N
People who are proposing to undergo, are undergoing or have undergone a process or part of a process of gender reassignment	N
People in particular age groups	N
Groups with particular faiths/beliefs	N
Marriage / civil partnership	N

If the screening has identified a potentially disproportionate adverse impact, you will need to complete an Equality Impact Assessment.

EIA required?:	N
EIA to be completed by:	N/A
Deadline:	N/A

Lead officer for this proposal:	Gavin F Moore, Head of Parking and Lighting

Budget Options Information

Reference:	2021-23 R&E 003
Service(s):	Highways and Infrastructure
Lead Member(s):	Cllr Sheth

Savings Proposals:	Increasing Schemes / Drainage Fees

Financial and Staffing Information

2019/20	
Total budget for the service(s) £'000:	£1,259
Total post numbers in the services(s) (FTE):	43

	2021/22	2022/23
	£'000	£'000
Proposed saving:	100	0
	FTE	FTE
Proposed staffing reduction:	N/A	N/A

Proposed savings

£100k from an increase in the level of fees applied to the delivery of large scale funded infrastructure improvement projects.

How would this affect users of this service?

There would be no impact on users of the service.

Key milestones

Review of fees and charges to be undertaken and agreed as part of the budget setting process for 2021/22.

Key consultations

N/A

Key risks and mitigations

Any increase in the level of fees applied will likely see less work able to undertaken for the funding that is available to resource these schemes. A neighbourhood

approach to managing these schemes will improve the delivery and the quality of the outcomes of the overall programme.

Equality impact screening

Is there potential for the proposed saving to have a disproportionate adverse impact on any of the following groups:	
Disabled people	N
Particular ethnic groups	N
Men or Women (include impacts due to pregnancy/maternity)	N
People of particular sexual orientation/s	N
People who are proposing to undergo, are undergoing or have undergone a process or part of a process of gender reassignment	N
People in particular age groups	N
Groups with particular faiths/beliefs	N
Marriage / civil partnership	N

If the screening has identified a potentially disproportionate adverse impact, you will need to complete an Equality Impact Assessment.

EIA required?:	N
EIA to be completed by:	N/A
Deadline:	N/A
Lead officer for this proposal:	Chris Whyte, Operational Director, Environmental Services

Budget Options Information

Reference:	2021-23 R&E 004
Service(s):	Highways and Infrastructure
Lead Member(s):	Cllr Sheth

Savings Proposals:	Footway Damage Cost Recovery

Financial and Staffing Information

2019/20	
Total budget for the service(s) £'000:	£1,259
Total post numbers in the services(s) (FTE):	43

	2021/22	2022/23
	£'000	£'000
Proposed saving:	0	50
	FTE	FTE
Proposed staffing reduction:	N/A	N/A

Proposed savings

£50k net saving by deploying a dedicated officer to more proactively recover the cost of repairs from developers and builders causing damage to the public highway.

How would this affect users of this service?

A means of holding those who damage our highways to account will improve the overall look of the public realm.

Key milestones

Development of cost recovery process and systems, and recruitment of officer through 2020, with deployment starting in April 2021

Key consultations

Legal Services

Key risks and mitigations

The legal basis needs to be fully understood and accounted for so that the potential for challenge can be mitigated.

Successful application may lead to diminishing returns and a reduced level of saving over time. The wider and ongoing neighbourhood monitoring regime will ensure all opportunities for enforcement are identified and acted upon.

The level of sanctions to be processed may create an administrative burden and the capacity of existing support must be assessed and/or additional capacity created to support the overall business case.

Equality impact screening

Is there potential for the proposed saving to have a disproportionate adverse impact on any of the following groups:	
Disabled people	N
Particular ethnic groups	N
Men or Women (include impacts due to pregnancy/maternity)	N
People of particular sexual orientation/s	N
People who are proposing to undergo, are undergoing or have undergone a process or part of a process of gender reassignment	N
People in particular age groups	N
Groups with particular faiths/beliefs	N
Marriage / civil partnership	N

If the screening has identified a potentially disproportionate adverse impact, you will need to complete an Equality Impact Assessment.

EIA required?:	N
EIA to be completed by:	N/A
Deadline:	N/A

Lead officer for this proposal:	Chris Whyte, Operational Director, Environmental Services

Budget Options Information

Reference:	2021-23 R&E 005
Service(s):	Regeneration – Building Control
Lead Member(s):	Cllr Tatler

Savings Proposals:	a) Increase BC published fees by 10% (up to 15 dwellings) b) More business from in-house Council led developments

Financial and Staffing Information

2019/20	
Total budget for the service(s) £'000:	(£722)
Total post numbers in the services(s) (FTE):	12 full time (4 vacant) 1 x 0.6

	2021/22	2022/23
	£'000	£'000
Proposed saving:	50	0
	FTE	FTE
Proposed staffing reduction:	Nil	Nil

How would this affect users of this service?

- Additional cost to applicants could be a deterrent to using the in-house service in a competitive market.
- Increasing fees by 10% could result in loss of competitiveness against Approved inspectors with a consequential loss of income. An officer has been working on a bench marking exercise of BC fees across other London Boroughs but with recent staff shortages this has not yet been completed.
- If it is only proposed to increase fees in relation to new housing schemes (up to 15 dwellings), we do not have a lot of these type of applications currently and I therefore do not think this will generate the required savings. It would also reduce our competitiveness against improved inspectors with the loss of income, however I believe fees in this type of work must be increased.
- The proposal to require the use of in house Building Control would be very welcome and would result in an increase in fee income which could contribute to the savings target. However, Project managers and budget holders would have to make it a contractual requirement that contractors use Brent BC

Key milestones

- Bench Marking Complete – Christmas 2019
- Meeting with in house Project managers and Budget holders to discuss in-house work

- Publish new fee schedule and web forms March 2020

Key consultations

- Meeting with in House project managers and budget holders re obtaining agreement to use in house Brent Building Control on all Brent projects.

Key risks and mitigations

- Bench marking would need to be completed with other London Building Control departments to assess current fee levels and scope for increasing fee levels on “standard fee type applications”.
- All fee schedules not publically available for comparisons
Mitigation – work with cross London group of authorities underway; accept that data collection may only be partial
- Fee increases makes Brent uncompetitive
Mitigation – benchmarking already indicates Brent is around 10% below many similar Boroughs; last fee review was 2016 so a new look is due.
- Manifesto commitment to use in house services not met
Mitigation – co-operative joint working and shared commitment ongoing

Equality impact screening

Is there potential for the proposed saving to have a disproportionate adverse impact on any of the following groups:	
Disabled people	N
Particular ethnic groups	N
Men or Women (include impacts due to pregnancy/maternity)	N
People of particular sexual orientation/s	N
People who are proposing to undergo, are undergoing or have undergone a process or part of a process of gender reassignment	N
People in particular age groups	N
Groups with particular faiths/beliefs	N
Marriage / civil partnership	N

If the screening has identified a potentially disproportionate adverse impact, you will need to complete an Equality Impact Assessment.

EIA required?:	N
EIA to be completed by:	N/A
Deadline:	N/A

Lead officer for this proposal:	John Flynn/Gerry Ansell

Budget Options Information

Reference:	2021-23 R&E 006
Service(s):	Passenger Transport
Lead Member(s):	Cllr Sheth

Savings Proposals:	Parking provision for SEN buses within Brent

Financial and Staffing Information

2019/20	
Total budget for the service(s) £'000:	£10,392
Total post numbers in the services(s) (FTE):	0

	2021/22	2022/23
	£'000	£'000
Proposed saving:	0	150
	FTE	FTE
Proposed staffing reduction:	N/A	N/A

Proposed savings

Relocating a number of buses back to a Brent depot from Harrow to reduce operating times and costs.

How would this affect users of this service?

Will create efficiencies in terms of routes and driving times and so create better comfort for passengers.

Key milestones

Brent depot development through 2020, 2021 and 2022 as part of 2023 Recommissioning Strategy in order to host a range of operational services and to provide parking space for a number of vehicles currently operating out of the Harrow depot.

Key consultations

Harrow Council as shared service partners, and also passengers.

Key risks and mitigations

To avoid service disruption, only those routes that will provide operational efficiencies and a saving should be relocated to Brent.

Equality impact screening

Is there potential for the proposed saving to have a disproportionate adverse impact on any of the following groups:	
Disabled people	Y
Particular ethnic groups	N
Men or Women (include impacts due to pregnancy/maternity)	N
People of particular sexual orientation/s	N
People who are proposing to undergo, are undergoing or have undergone a process or part of a process of gender reassignment	N
People in particular age groups	Y
Groups with particular faiths/beliefs	N
Marriage / civil partnership	N

If the screening has identified a potentially disproportionate adverse impact, you will need to complete an Equality Impact Assessment.

EIA required?:	Y
EIA to be completed by:	C Whyte
Deadline:	Jan 2020

Lead officer for this proposal:	Chris Whyte, Operational Director, Operational Services.

Budget Options Information

Reference:	2021-23 R&E 007
Service(s):	Regeneration: Development Management Planning
Lead Member(s):	Cllr Tatler

Savings Proposals:	Additional pre-application charges for specialists eg conservation and design, landscaping

Financial and Staffing Information

2019/20	
Total budget for the service(s) £'000:	£788
Total post numbers in the services(s) (FTE):	3 (Place making team)

	2021/22	2022/23
	£'000	£'000
Proposed saving:	5	0
	FTE	FTE
Proposed staffing reduction:	0	0

Proposed savings

The service already charges considerable amounts for a pre-application service, tiered to reflect the size of the proposal and the amount of time spent on giving pre-app advice. For all but the smallest schemes, the charge includes some input from specialist design services where required eg conservation and design, trees and landscaping.

However, there may be some instances where the specialist advice goes beyond the basic service, in which case an additional charge could be levied, in agreement with the applicant.

How would this affect users of this service?

Providing pre-application advice is a non-statutory function but is seen as an essential part of the planning service. As this would mainly affect commercial operators (rather than domestic residents) it would be built in to their calculations on scheme costs.

Key milestones

- a) establishing charging schedule, publishing
- b) implementing this proposal from April 2020

Key consultations

None

Key risks and mitigations

The Council's pre-application charges were reviewed two years ago and are already in the highest quartile for charges in London, something which has in the past attracted adverse industry press.

Mitigation: publish revised charging schedule for full transparency, and make additional specialist advise an optional extra.

In an uncertain economic climate, the overall charge could put off potential investors and give the impression that Brent is 'open for business'

Mitigation: this is a risk of perception as the additional charge would not be significant. Other messaging and regeneration branding, plus demonstrable outcomes on the ground to counter-act that.

Equality impact screening

Is there potential for the proposed saving to have a disproportionate adverse impact on any of the following groups:	
Disabled people	No
Particular ethnic groups	No
Men or Women (include impacts due to pregnancy/maternity)	No
People of particular sexual orientation/s	No
People who are proposing to undergo, are undergoing or have undergone a process or part of a process of gender reassignment	No
People in particular age groups	No
Groups with particular faiths/beliefs	No
Marriage / civil partnership	No

If the screening has identified a potentially disproportionate adverse impact, you will need to complete an Equality Impact Assessment.

EIA required?:	No
EIA to be completed by:	N/A
Deadline:	N/A

Lead officer	Gerry Ansell/David Glover

Budget Options Information

Reference:	2021-23 R&E 009
Service(s):	Regeneration - Employment, Skills and Enterprise
Lead Member(s):	Cllr Agha

Savings Proposals:	To develop a commercial training arm that can utilise the apprenticeship levy to deliver Apprenticeship Standards. This can generate an income, whilst it does require upfront investment in the staff and resources needed.

Financial and Staffing Information

2019/20	
Total budget for the service(s) £'000:	(£23)
Total post numbers in the services(s) (FTE):	58 FTE (excluding part time tutors)

	2021/22	2022/23
	£'000	£'000
Proposed saving:	£15	£30
	FTE	FTE
Proposed staffing reduction:	0	0

Proposed savings

Forecast surplus (profit) margin of £15k in year 1 of operation 2021-22, rising to £30k in 2022-23.

This requires investment in additional capacity that will be required ongoing. It means that a growth budget request is needed rather than one off expenditure.

- £20k investment in 2020-21 to pay for additional sessional teaching capacity and a new e-learning portfolio system, required for apprenticeship delivery.
- 2021-22 –£80k investment in 2022-23 to upscale the team – to pay for 0.5FT Business Development Officer and a Data Administrator.

How would this affect users of this service?

New apprenticeships can be delivered by the service in the council, with local schools, the health service and in the care sector. These are the early areas of business development planned, where the council has strong connections.

Key milestones

2019-20:

- Soft market testing with employers to generate business leads
- Register on the national framework as an apprenticeship provider (Brent Start).

2020-21:

- Begin business client management and delivery of Apprenticeships in 20-21 financial year.
- Procurement of new e-learning portfolio system.
- Recruitment of teaching staff for early delivery.
- In Quarter 4 recruit to business development role and admin role for starts in April 2021.

Key consultations

- Consultation with staff will be taken forward with staff to assist with the development of the project. It will not affect existing posts.

Key risks and mitigations

- Risk: Insufficient interest in the new service. Mitigation: to complete soft market testing in advance of launch and to start at a small scale and then incrementally increase the provision.
- Risk: not being registered on the national register. Mitigation: for this to be confirmed before additional investment in the development of the service.

Equality impact screening

Equality needed in recruitment of apprenticeships delivered by the new service and working with employers.

Is there potential for the proposed saving to have a disproportionate adverse impact on any of the following groups:	
Disabled people	No
Particular ethnic groups	No
Men or Women (include impacts due to pregnancy/maternity)	No
People of particular sexual orientation/s	No
People who are proposing to undergo, are undergoing or have undergone a process or part of a process of gender reassignment	No

People in particular age groups	No
Groups with particular faiths/beliefs	No
Marriage / civil partnership	No

If the screening has identified a potentially disproportionate adverse impact, you will need to complete an Equality Impact Assessment.

EIA required?:	No
EIA to be completed by:	N/A
Deadline:	N/A

Lead officer for this proposal:	Joanne Thomas, Employment Senior manager

Budget Options Information

Reference:	2021-23 R&E 011
Service(s):	Client FM Team, Property
Lead Member(s):	Cllr Tatler

Savings Proposals:	A 12-month extension to the existing FM contract is currently being arranged. It is proposed to receive proposals to achieve savings of £70k at the time that the existing FM contract extension is agreed.

Financial and Staffing Information

2019/20	
Total budget for the service(s) £'000:	£5,800
Total post numbers in the services(s) (FTE):	10

	2021/22	2022/23
	£'000	£'000
Proposed saving:	£70	0
	FTE	FTE
Proposed staffing reduction:	1	0

Proposed savings

- Reduction of 1 contracted Security Post at £30k approx.
- Option for spend to save innovation or remote open and close of FM managed buildings.

How would this affect users of this service?

Security impact would be absorbed within existing team structures.
Remote lock/ unlocking would mean service users no longer have a physical guard locking and unlocking the premises.

Key milestones

Contract extension being agreed and signed.

Key consultations

Apleona staff consultation (for Security staffing change).

Building stakeholder consultation (for lock/ unlock revisions).

Key risks and mitigations

Risk - Buildings are not checked physically by a guard for locking unlocking.
Mitigation – Remote system will confirm whether buildings have been remotely locked or not.

Equality impact screening

Is there potential for the proposed saving to have a disproportionate adverse impact on any of the following groups:	
Disabled people	No
Particular ethnic groups	No
Men or Women (include impacts due to pregnancy/maternity)	No
People of particular sexual orientation/s	No
People who are proposing to undergo, are undergoing or have undergone a process or part of a process of gender reassignment	No
People in particular age groups	No
Groups with particular faiths/beliefs	No
Marriage / civil partnership	No

If the screening has identified a potentially disproportionate adverse impact, you will need to complete an Equality Impact Assessment.

EIA required?:	No
EIA to be completed by:	N/A
Deadline:	N/A

Lead officer for this proposal:	Russell Burnaby, FM Portfolio Manager

Budget Options Information

Reference:	2021-23 CDS 001 & 002
Service(s):	ICT Client & Applications
Lead Member(s):	Cllr Margaret McLennan

Savings Proposals:	ICT Client & Applications income generation from sale of IT support services.

Financial and Staffing Information

2019/20	
Total budget for the service(s) £'000:	£5,800
Total post numbers in the services(s) (FTE):	46

	2021/22	2022/23
	£'000	£'000
Proposed saving:		
Income Generation		
Increase IT support charge to external organisations	50	30
	FTE	FTE
Proposed staffing reduction		0

Proposed savings

Increase in income generated from charging for IT support. Increase charge to partner organisations and also explore opportunities for expanding on the organisations which the ICT Client & Applications could provide support for MS Dynamics.

How would this affect users of this service?

The current user base would increase, however it is not anticipated that this will have any adverse impact on the quality of the service offered as the intention is to grow

the support provision and cover costs and generate income over and above any additional staffing requirement.

Key milestones

N/A

Key consultations

Consultation with current and new partner organisations.

Key risks and mitigations

Risk of adverse impact to service delivery will be mitigated by increasing staff as required, but ensuring these costs are met from income generated.

Equality impact screening

Is there potential for the proposed saving to have a disproportionate adverse impact on any of the following groups:	
Disabled people	No
Particular ethnic groups	No
Men or Women (include impacts due to pregnancy/maternity)	No
People of particular sexual orientation/s	No
People who are proposing to undergo, are undergoing or have undergone a process or part of a process of gender reassignment	No
People in particular age groups	No
Groups with particular faiths/beliefs	No
Marriage / civil partnership	No

If the screening has identified a potentially disproportionate adverse impact, you will need to complete an Equality Impact Assessment.

EIA required?:	No
EIA to be completed by:	N/A
Deadline:	N/A

Lead officer for this proposal:	Sally Chin, Head of ICT & Applications

Budget Options Information

Reference:	2021-23 CDS 003 & 005
Service(s):	ICT Client & Applications
Lead Member(s):	Cllr McLennan

Savings Proposals:	ICT Client & Applications reduction in support services.

Financial and Staffing Information

2019/20	
Total budget for the service(s) £'000:	£5,800
Total post numbers in the services(s) (FTE):	46

	2021/22	2022/23
	£'000	£'000
Proposed saving:		
Reduction in printing costs	40	0
Reduction in cost of Oracle changes and future developments	20	0
	FTE	FTE
Proposed staffing reduction	0	0

Proposed savings

Printing:

Early indications from the award of the Council's printing contract coupled with the roll out of laptops has resulted in a prediction that there will be a reduction in the volume of printing.

Oracle Developments:

There is a need to review the use of the current Oracle system, therefore the best approach is to reduce the number of changes on the current version of Oracle whilst this review is underway. Keeping changes to an absolute minimum will enable this budget to be reduced by £20k per year ongoing.

How would this affect users of this service?

No direct impact

Key milestones

N/A

Key consultations

Discussion with key internal stakeholders, i.e. Colleagues in Corporate Finance.

Key risks and mitigations

Risk that projected usage of printing does not decrease as current predictions suggest, to mitigate this other options will be explored, i.e. completely switching off colour printing and contacting high usage users.

Equality impact screening

Is there potential for the proposed saving to have a disproportionate adverse impact on any of the following groups:	
Disabled people	No
Particular ethnic groups	No
Men or Women (include impacts due to pregnancy/maternity)	No
People of particular sexual orientation/s	No
People who are proposing to undergo, are undergoing or have undergone a process or part of a process of gender reassignment	No
People in particular age groups	No
Groups with particular faiths/beliefs	No
Marriage / civil partnership	No

If the screening has identified a potentially disproportionate adverse impact, you will need to complete an Equality Impact Assessment.

EIA required?:	No
EIA to be completed by:	N/A
Deadline:	N/A

Lead officer for this proposal:	Sally Chin, Head of ICT & Applications

Budget Options Information

Reference:	2021-23 CDS 004
Service(s):	ICT Client & Applications
Lead Member(s):	Cllr Margaret McLennan

Savings Proposals:	ICT Client & Applications staffing efficiencies

Financial and Staffing Information

2019/20	
Total budget for the service(s) £'000:	£5,800
Total post numbers in the services(s) (FTE):	46

	2021/22	2022/23
	£'000	£'000
Proposed saving:		
Management Salaries		130
Part year impact of 1 x FTE		30
	FTE	FTE
Proposed staffing reduction		2

Proposed savings

Reduction of one management post and one Database Administrator Post, which will be a part year impact in 2022/23 and full year impact thereafter. This will be a result of an ongoing review and of re-alignment of the current structure following an anticipated move to Cloud services and therefore a reduction in the technical resources needed to provide ongoing support.

The plan is to have an ongoing succession plan in place so that other managers within the team can gain the skills to provide effective cover for the deletion of the senior manager post.

How would this affect users of this service?

No impact. It is anticipated that as the Technical element of the current work reduces the need for senior management will reduce and the remaining work would be redistributed across the team.

Key milestones

N/A

Key consultations

Consultation with affected staff on any structural changes.

Key risks and mitigations

Risk of adverse impact to service delivery will be mitigated by gradual implementation of changes and allocation of work between other managers in the team.

Equality impact screening

Is there potential for the proposed saving to have a disproportionate adverse impact on any of the following groups:	
Disabled people	No
Particular ethnic groups	No
Men or Women (include impacts due to pregnancy/maternity)	No
People of particular sexual orientation/s	No
People who are proposing to undergo, are undergoing or have undergone a process or part of a process of gender reassignment	No
People in particular age groups	No
Groups with particular faiths/beliefs	No
Marriage / civil partnership	No

If the screening has identified a potentially disproportionate adverse impact, you will need to complete an Equality Impact Assessment.

EIA required?:	No
EIA to be completed by:	N/A
Deadline:	N/A

Lead officer for this proposal:	Sally Chin, Head of ICT & Applications

Budget Options Information

Reference:	2021-23 CDS 006
Service(s):	Customer Access
Lead Member(s):	Cllr McLennan

Savings Proposals:	Merger of Housing and Corporate Contact Centres

Financial and Staffing Information

2019/20	
Total budget for the service(s) £'000:	£10,700
Total post numbers in the services(s) (FTE):	228

	2021/22	2022/23
	£'000	£'000
Proposed saving:	£50	£50
	FTE	FTE
Proposed staffing reduction	1	1

Proposed savings

Merger of Housing and Corporate Contact Centre with rationalisation of management in 2021/22 and staff efficiencies in 2022/23

How would this affect users of this service?

Should not affect users

Key milestones

Implementation of CRM in 2019/20 (Corporate Contact centre) By December 2019
 Restructure of Contact centres : June 2020 to August 2020 (TBC)
 Staff reduction through natural wastage during 2020/21

Key consultations

Formal consultation with staff affected

Stakeholder consultation with services affected

Key risks and mitigations

Delays in implementation of CRM delay merger

Plans are already well progressed and go live for the Corporate Contact Centre is imminent

Restructure of both Contact centres unsettles staff affecting performance / increased turnover

Impact on staff will be minimise by managing reductions through natural turnover. Staff are involved in the change project to implement CRM and will be involved in the merger so as to optimise engagement

Equality impact screening

Is there potential for the proposed saving to have a disproportionate adverse impact on any of the following groups:	
Disabled people	No
Particular ethnic groups	No
Men or Women (include impacts due to pregnancy/maternity)	No
People of particular sexual orientation/s	No
People who are proposing to undergo, are undergoing or have undergone a process or part of a process of gender reassignment	No
People in particular age groups	No
Groups with particular faiths/beliefs	No
Marriage / civil partnership	No

If the screening has identified a potentially disproportionate adverse impact, you will need to complete an Equality Impact Assessment.

EIA required?:	No
EIA to be completed by:	N/A
Deadline:	N/A

Lead officer for this proposal:	Troy Francis, Director of Customer Access

Budget Options Information

Reference:	2021-23 CDS 007
Service(s):	Customer Access
Lead Member(s):	Cllr McLennan

Savings Proposals:	Reduction in postal costs

Financial and Staffing Information

2019/20	
Total budget for the service(s) £'000:	£10,700
Total post numbers in the services(s) (FTE):	228

	2021/22	2022/23
	£'000	£'000
Proposed saving:		£30
	FTE	FTE
Proposed staffing reduction	0	0

Proposed savings

Reduce expenditure on postage through increased use of automation and on line channels for residents

How would this affect users of this service?

No impact – this should be a natural consequence of the implementation of the Digital Strategy which is increasing digital self service across a range of services and making it easier for residents to transact on line.

Key milestones

Implementation of Digital strategy – key milestones include implementation of a new Customer Portal enabling residents to access on line services through one account – implementation of Microsoft Dynamics for Council Tax and Housing Benefits

Key consultations

Key service stakeholders

Key risks and mitigations

Channel shift not achieved due to delays in implementation of digital strategy

Robust programme management in place with oversight from new Customer and Digital Board

Service issues cause backlogs of work resulting in increased volumes of post
Monitoring of postal costs and remedial action to address any overspend if forecast

Equality impact screening

Is there potential for the proposed saving to have a disproportionate adverse impact on any of the following groups:	
Disabled people	no
Particular ethnic groups	no
Men or Women (include impacts due to pregnancy/maternity)	no
People of particular sexual orientation/s	no
People who are proposing to undergo, are undergoing or have undergone a process or part of a process of gender reassignment	no
People in particular age groups	no
Groups with particular faiths/beliefs	no
Marriage / civil partnership	no

If the screening has identified a potentially disproportionate adverse impact, you will need to complete an Equality Impact Assessment.

EIA required?:	no
EIA to be completed by:	N/A
Deadline:	N/A

Lead officer for this proposal:	Troy Francis, Director of Customer Access

Budget Options Information

Reference:	2021-23 CDS 008
Service(s):	Customer & Digital Services
Lead Member(s):	Cllr McLennan

Savings Proposals:	BCS - Savings from new Council Tax Support scheme

Financial and Staffing Information

2019/20	
Total budget for the service(s) £'000:	10,700
Total post numbers in the services(s) (FTE):	228

	2021/22	2022/23
	£'000	£'000
Proposed saving:	50	0
	FTE	FTE
Proposed staffing reduction	1.25	0

Proposed savings

A new Council Tax Support (CTS) scheme is being introduced from April 2020. Although initially this may generate some additional customer demand due to the change from the existing scheme, following this it is expected that the new, simplified scheme will be easier to administer (as well as providing opportunities for greater automation.)

This staff saving will be made during the first year of running the new CTS scheme through natural turnover.

See also Savings proposal 2021-23 CDS 011, in conjunction with this proposal.

It should be noted that the Benefit Service is also reducing other staffing costs (currently met via Reserves) by approximately £200K each year up to 2023/24 in relation to the rollout of Universal Credit.

How would this affect users of this service?

There is not expected to be any impact on service users due to the staffing reduction; they will in fact be experiencing a simpler and quicker process for claiming CTS.

Key milestones

Saving to be met via natural turnover during 2020/21, providing a full-year saving for 2021/22.

Key consultations

Not required.

Key risks and mitigations

None evident.

Equality impact screening

Is there potential for the proposed saving to have a disproportionate adverse impact on any of the following groups:	
Disabled people	No
Particular ethnic groups	No
Men or Women (include impacts due to pregnancy/maternity)	No
People of particular sexual orientation/s	No
People who are proposing to undergo, are undergoing or have undergone a process or part of a process of gender reassignment	No
People in particular age groups	No
Groups with particular faiths/beliefs	No
Marriage / civil partnership	No

If the screening has identified a potentially disproportionate adverse impact, you will need to complete an Equality Impact Assessment.

EIA required?:	No
EIA to be completed by:	N/A
Deadline:	N/A

Lead officer for this proposal:	Troy Francis, Director of Customer Access

Budget Options Information

Reference:	2021-23 CDS 009
Service(s):	Customer Access
Lead Member(s):	Cllr McLennan

Savings Proposals:	Increased automation

Financial and Staffing Information

2019/20	
Total budget for the service(s) £'000:	£10,700
Total post numbers in the services(s) (FTE):	228

	2021/22	2022/23
	£'000	£'000
Proposed saving:	£50	£50
	FTE	FTE
Proposed staffing reduction	1	1

Proposed savings

Implementation of increased automation through Robotic processing, Northgate modules, CRM

How would this affect users of this service?

Automation should have a positive impact for residents as it will increase processing efficiency, accuracy and consistency of decisions.

Key milestones

Northgate modules are being implemented during 2019/20 and the benefits should start to be realised by 2020.

Identification of further processes suitable for robotic processing by January 2020-delivery by March 2021.

Implementation of CRM for HB and Council Tax by September 2020.

Key consultations

Internal stakeholder affected by changes

Key risks and mitigations

Delays in delivering automation projects

Will be mitigated through robust project management and thorough testing

Equality impact screening

Is there potential for the proposed saving to have a disproportionate adverse impact on any of the following groups:	
Disabled people	No
Particular ethnic groups	No
Men or Women (include impacts due to pregnancy/maternity)	No
People of particular sexual orientation/s	No
People who are proposing to undergo, are undergoing or have undergone a process or part of a process of gender reassignment	No
People in particular age groups	No
Groups with particular faiths/beliefs	No
Marriage / civil partnership	No

If the screening has identified a potentially disproportionate adverse impact, you will need to complete an Equality Impact Assessment.

EIA required?:	No
EIA to be completed by:	N/A
Deadline:	N/A

Lead officer for this proposal:	Troy Francis, Director of Customer Access

Budget Options Information

Reference:	2021-23 CDS 010
Service(s):	Customer & Digital Services
Lead Member(s):	Cllr McLennan
Savings Proposals:	BCS - Replace IEG (on line benefits form)

Financial and Staffing Information

2019/20	
Total budget for the service(s) £'000:	10,700
Total post numbers in the services(s) (FTE):	228

	2021/22	2022/23
	£'000	£'000
Proposed saving:	0	75
	FTE	FTE
Proposed staffing reduction	0	1

Proposed savings

The Benefits Service currently utilises an electronic claim form (IEG4) for claimants to make initial claims and report changes in circumstances. This is used in conjunction with Risk Based Verification (RBV) software which risk-scores each claim / change, thereby dictating how much evidence is required from the claimant to support their claim.

Over the next couple of years, there will be less need to utilise this relatively expensive approach, because: -

- The continued rollout of Universal Credit (UC) will result in a significant reduction in the number of claims and changes in circumstances for Housing Benefit (HB)
- A new Council Tax Support (CTS) scheme is being introduced from April 2020, utilising a significantly simpler claim process, less need for evidence verification from claimants (as more information from DWP and HMRC will be utilised), and indeed less need or benefit to be gained from differentiating

claims on a risk basis (as many of the “higher risk” claims will have migrated from HB to UC).

As a result, it will be possible to move from IEG to a simpler and cheaper alternative e-claim (whether from a third party or internally developed in MS Dynamics). It will also be possible to move away from RBV or introduce a simpler and cheaper variation of this. Furthermore, the simplified CTS scheme has the potential for robotic automation to transfer data from the e-claim directly into the Council Tax system.

Savings will be deliverable by 2022/23 and achieved through cheaper alternative systems (or completely stopping use of RBV), plus 1FTE staffing saving from the potential robotic process.

How would this affect users of this service?

There is not expected to be any impact on service users due to these changes; in fact, the benefits claim process and administration is expected to be improved via these proposals. Customer service is expected to be improved as a result.

Key milestones

Evaluation of the first year of CTS implementation and potential for automation and further efficiencies – April 2021

Options appraisal for alternative e-claim packages (or in-house alternatives) – July 2021

Procurement and design of new systems – September 2021

Implementation of new systems – December 2021

Full year savings realised from April 2022

Key consultations

Not required.

Key risks and mitigations

Usual risks involved in procurement and implementation of new IT systems. To be mitigated through robust project management.

Equality impact screening

Is there potential for the proposed saving to have a disproportionate adverse impact on any of the following groups:	
Disabled people	No
Particular ethnic groups	No
Men or Women (include impacts due to pregnancy/maternity)	No
People of particular sexual orientation/s	No

People who are proposing to undergo, are undergoing or have undergone a process or part of a process of gender reassignment	No
People in particular age groups	No
Groups with particular faiths/beliefs	No
Marriage / civil partnership	No

If the screening has identified a potentially disproportionate adverse impact, you will need to complete an Equality Impact Assessment.

EIA required?:	No
EIA to be completed by:	N/A
Deadline:	N/A

Lead officer for this proposal:	Troy Francis, Director of Customer Access

Budget Options Information

Reference:	2021-23 CDS 011
Service(s):	Customer & Digital Services
Lead Member(s):	Cllr McLennan

Savings Proposals:	BCS - Staffing efficiencies

Financial and Staffing Information

2019/20	
Total budget for the service(s) £'000:	10,700
Total post numbers in the services(s) (FTE):	228

	2021/22	2022/23
	£'000	£'000
Proposed saving:	50	95
	FTE	FTE
Proposed staffing reduction	1.25	2.5

Proposed savings

Staffing efficiencies will come from a variety of areas:-

- A new Council Tax Support (CTS) scheme is being introduced from April 2020. Although initially this may generate some additional customer demand due to the change from the existing scheme, following this it is expected that the new, simplified scheme will be easier to administer (as well as providing opportunities for greater automation.)
- The Council Tax service was brought back in house in May 2019 and after stabilising the service during 2019/20 it is expected that staffing efficiencies can be made via streamlining of processing, and in improved joint handling of queries between Benefits and Council Tax.
- It is anticipated that efficiencies can be made in the Debt Recovery section due to streamlined debt collection processes following the introduction of the ASH corporate debt system (expected during 2020).

Savings will be spread across 2021/22 and 2022/23 and achieved through natural turnover.

See also Savings proposal 2021-23 CDS 008, in conjunction with this proposal.

It should be noted that the Benefits Service is also reducing other staffing costs by approximately £200k each year up to 2023/24 in relation to the rollout of Universal Credit.

How would this affect users of this service?

There is not expected to be any impact on service users due to these staffing reductions, as they are all expected to be accomplished via streamlined or simplified processes (Council Tax / Benefits) or new systems (ASH). Customer service is expected to be improved as a result.

Key milestones

Savings to be met via natural turnover during 2020/21 and 2021/22, providing full-year savings for 2021/22 and 2022/23 respectively.

Key consultations

Not required.

Key risks and mitigations

None evident.

Equality impact screening

Is there potential for the proposed saving to have a disproportionate adverse impact on any of the following groups:	
Disabled people	No
Particular ethnic groups	No
Men or Women (include impacts due to pregnancy/maternity)	No
People of particular sexual orientation/s	No
People who are proposing to undergo, are undergoing or have undergone a process or part of a process of gender reassignment	No
People in particular age groups	No
Groups with particular faiths/beliefs	No
Marriage / civil partnership	No

If the screening has identified a potentially disproportionate adverse impact, you will need to complete an Equality Impact Assessment.

EIA required?:	No

EIA to be completed by:	N/A
Deadline:	N/A

Lead officer for this proposal:	Troy Francis, Director of Customer Access

Budget Options Information

Reference:	2021-23 CDS 012
Service(s):	Customer & Digital Services
Lead Member(s):	Cllr McLennan

Savings Proposals:	Transformation staffing efficiencies

Financial and Staffing Information

2019/20	
Total budget for the service(s) £'000:	£3,000
Total post numbers in the services(s) (FTE):	53

	2021/22	2022/23
	£'000	£'000
Proposed saving:		100
	FTE	FTE
Proposed staffing reduction		1

Proposed savings

Reduction of one management post as part of re-alignment of team structure following merger of Transformation, BCS service improvement, web and business intelligence functions.

How would this affect users of this service?

No impact. Work would be redistributed across the team.

Key milestones

N/A

Key consultations

Consultation with affected staff on any structural changes.

Key risks and mitigations

Risk of impact to delivery of transformation work programme will be mitigated by gradual implementation of changes and re-alignment of work between other managers in the team.

Equality impact screening

Is there potential for the proposed saving to have a disproportionate adverse impact on any of the following groups:	
Disabled people	No
Particular ethnic groups	No
Men or Women (include impacts due to pregnancy/maternity)	No
People of particular sexual orientation/s	No
People who are proposing to undergo, are undergoing or have undergone a process or part of a process of gender reassignment	No
People in particular age groups	No
Groups with particular faiths/beliefs	No
Marriage / civil partnership	No

If the screening has identified a potentially disproportionate adverse impact, you will need to complete an Equality Impact Assessment.

EIA required?:	No
EIA to be completed by:	N/A
Deadline:	N/A

Lead officer for this proposal:	Sadie East, Head of Transformation

Budget Options Information

Reference:	2021-23 CE 001/2/3
Service(s):	Chief Executive's Departments – (i) Finance, (ii) Legal, Human Resources, Audit and Investigations (iii) Assistant Chief Executive
Lead Member(s):	Cllr Butt, Cllr McLennan, Cllr Miller
Savings Proposals:	Various proposals to achieve efficiency savings, see details below.

Financial and Staffing Information

2019/20	
Total budget for the service(s) £'000:	Finance: £7,482 LHRAI: £8,528 ACE: £7,626
Total post numbers in the services(s) (FTE):	Finance: 106 LHRAI: 118 ACE: 94

	2021/22	2022/23
	£'000	£'000
Proposed saving:	0	300
	FTE	FTE
Proposed staffing reduction	0	1

Proposed savings

Efficiencies within LHRA&I include:

1. Reduce external Internal Audit through re-procurement and utilise finance resource through rotations. This will reduce overall available internal audit hours.
2. Full cost recovery from external.
3. Restructure of vacant posts in a legal team.
4. Rationalise OH checks on recruitment.
5. Re-procurement of Legal Library provider

Efficiencies within Finance include:

6. Centralise management of all the council's energy spend drive procurement savings.
7. Rationalise, reduce and consolidate the use of document storage across the council via destruction and use of technology. This would be a spend to save project.

Efficiencies within ACE include:

8. It is proposed to review the structure of the admin support across the council and centralise core elements within the Executive & Member Services function in 2021/22 which will result in efficiencies.
9. Restructure of Conference and Events to remodel the service with a view to generating more income, c£200k. This will mainly cover the historic communications income target gap and the £100k saving required for 2020/21.

How would this affect users of this service?

Minimal impact on users as the proposals focus primarily on efficiency savings and income generation.

Key consultations

Restructures proposed within the ACE department will be managed through the Managing Change policy.

Key risks and mitigations

Regarding the reduction in internal audit hours, there is a risk that the quality and quantity of independent assurance on the Council's mitigation of key risks is diminished.

To minimise this risk, we have been named in a re-procurement exercise for pan-London Audit services which is intended to provide optimum value for money while retaining quality and providing more flexibility i.e. it should be cheaper than our current arrangement and will allow us to call off additional resource should the need arise.

Additionally, it is proposed that we increase the amount of resource provided by finance graduates on rotation to the IA team. This will most likely increase from three to six months per assignment.

Furthermore, we have significantly increased our coverage in the last two calendar years including covering most key risk areas. It is proportionate in these circumstances to review levels of overall coverage.

Equality impact screening

Is there potential for the proposed saving to have a disproportionate adverse impact on any of the following groups:	
Disabled people	N
Particular ethnic groups	N
Men or Women (include impacts due to pregnancy/maternity)	N
People of particular sexual orientation/s	N
People who are proposing to undergo, are undergoing or have undergone a process or part of a process of gender reassignment	N
People in particular age groups	N
Groups with particular faiths/beliefs	N
Marriage / civil partnership	N

If the screening has identified a potentially disproportionate adverse impact, you will need to complete an Equality Impact Assessment.

EIA required?:	N
EIA to be completed by:	N/A
Deadline:	N/A

Lead officer for this proposal:	Minesh Patel, Director of Finance. Debra Norman, Director of Legal, HR, Audit & Investigations. Peter Gadsdon, Strategic Director of Customer & Digital Services.

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**Appendix C(iv) – Cumulative Equalities Assessment – Budget
Proposals 2020/21 – 2021/22 and 2021/22 – 2022/23**

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1 INTRODUCTION

The purpose of this Equality Impact Assessment is to provide an analysis of the likely impact of the budget savings proposals on residents and community groups with ‘protected characteristics’ as defined by the Equality Act 2010. The nine protected characteristics are: age, disability, gender reassignment, marriage and civil partnership¹, race, religion or belief, sex and sexual orientation, pregnancy and maternity. Section 149, Public Sector Equality Duty (PSED) of the Equality Act 2010 requires the Council in the exercise of its functions to have regard to the need to:

1. eliminate discrimination, harassment, and victimisation and any other conduct prohibited under the act;
2. advance equality of opportunity between persons who share a relevant protected characteristic and those who do not;
3. foster good relations between persons who share a relevant protected characteristic and those who do not.

Whilst not a statutory requirement, it is our policy that where relevant an equality analysis should also cover human rights and socio-economic equality implications.

The Council is committed to equality, diversity and inclusion. It seeks to ensure that all residents, employees and stakeholders are treated fairly and receive appropriate, accessible services and fair and equal opportunities. This commitment requires that equality considerations play a key role in our decision making processes; and in understanding the effect of our policies and practices.

Approach to Considering Equalities

All the budget savings proposals have been subject to an initial Equality Impact Analysis (EIA) screening which helps to establish the relevance to the Council’s equalities duties and whether or not a full EIA is required. Guidance is issued to all officers on how to undertake an EIA and provides that full EIA’s will not be required if, through the initial screening, it is clearly demonstrated, for example that there will be no negative equality impacts. However, the council’s approach is that EIAs are living documents. Accordingly, even after

¹ Bullet point 2 and 3 does not apply to marriage and civil partnerships.

a screening has been undertaken as projects/proposals develop and further evidence of impacts becomes available, and any unforeseen impacts emerge, they should be reviewed and updated to reflect any changes.

A cumulative EIA was published on the equality implications of the 2019/2020 budget proposals, which were agreed at Full Council in February 2019.

Full Council agreed its business plans for 2020/21 in February 2019, and section 4 of the main budget report highlights key changes.

This document highlights the equality impacts for the budget proposals for 2020/21 and 2021/22 to 2022/23. Individual EIA screenings for each proposal and full Equality Analyses are attached.

10 saving proposals for 2020/21 and 20 saving proposals for 2021/22 to 2022/23 were identified as requiring full EIA's. The equality impacts for the budget proposals are summarised in this report.

The Council must carefully consider and have regard to the impact of its savings proposals on the PSED; and take a reasonable and proportionate view regarding the overall impact and seek to mitigate negative impacts where possible.

Overall Assessment

- A proportion of the savings:
 - may have a negative impact on equality of opportunity;
 - have the potential to result in indirect discrimination for some people with protected characteristics;
 - may have a negative impact on opportunities to promote good relations.
- The full EIA's have identified potential compounded impacts for the protected characteristics of age, disability, race, sex and to a lesser extent pregnancy and maternity.

However, these impacts will be kept under review and where possible mitigations have been identified to reduce the effect as set out below and in the individual savings descriptions.

In light of the above, the proposed budget saving proposals are considered reasonable and have shown due regard to the PSED.

2 Demography overview

Key facts about Brent's demographic profile are taken from the data sources [Population change in Brent](#) and the [Equality profile of Brent](#). They show how the borough is made up, helps us to identify potential impacts; and identifies the increasing pressures and demand for council services.

- Brent is home to around 335,300 residents and is the seventh largest borough in London.
- The borough has a population density of 7,652 people per square kilometre – the 14th highest density in England, and the highest in Outer London.
- Brent has high levels of population churn: in 2017-18, 32,600 people moved into the borough and 34,000 moved out – a turnover rate of 201 per 1000 population – 24th highest out of 317 areas in England, and second highest across Outer London.
- The Brent population increased by 27% between 1998-2018. In recent years, the borough's population change has been driven, primarily, by natural change (more births than deaths) as opposed to net migration. The birth rate has fallen over the year but remains well above the national average.
- Projections indicate that this pace of growth is set to continue: the population is expected to rise by a further 25% by 2041, faster than the London average (22%) and more than double the England average (10%). If realised, this would equate to an additional 84,800 residents by 2041.
- In line with national trends, the population is ageing: by 2041, the number of Brent residents aged 65 and over is projected to increase by 85% – an additional 34,900 older residents by 2041. The child population is also expected to grow, albeit more slowly, by 12% by 2041 (+8,600 children).
- Population growth will be concentrated in the areas where significant housing development is planned. The wards of Tokyngton and Alperton are expected to see the fastest growth: considered together, they are projected to accommodate an additional 47,600 residents by 2041.

A summary of the key protected characteristics in Brent are as follows:

Age

- Brent has a relatively young population. In 2018, the median age of the population was 35 in Brent, the same as in London, but five years lower than the national average (40 years, England). In Brent, 29% of the population is aged over 50 compared with 37% across England. Conversely, 39% of the borough's population is aged 25-49 compared with 33% in England. Brent has a higher proportion of children aged under ten compared with England (14% vs. 12%). The population has been ageing in recent years and this is expected to continue.

Disability

- Around one in seven Brent residents have a long-term health problem or disability that limits their day-to-day-activities in some way. The prevalence of disability rises sharply with age: more than half of all residents aged 65 and over had a long-term health problem or disability.

Gender reassignment

- The Government Equalities Office tentatively estimates that around 0.3-0.8% of the UK population are transgender. In Brent, this would equate to between 1,000 to 2,500 people. Since the Gender Recognition Act came into force, only a small minority have obtained a Gender Recognition Certificate: 0.007% of the UK population (4,910 people across the UK since 2005).

Marriage and civil partnership

- In 2015, 960 marriages or civil partnerships took place in Brent – of these, 29 (3%) were same sex marriages or civil partnerships, the same as the percentage nationally but lower than the percentage in London (5%).

Pregnancy and maternity

- Brent has relatively high birth rates. In 2018, there were 4,705 births in Brent – which equates to 68.1 births per 1,000 women aged 15 to 44 – well above the national rate (59.2). Three quarters of all births in Brent were to women born outside the UK (75%) – this is the highest rate in England and Wales, reflecting the diversity of the borough's population.

Race

- Almost two thirds (65%) of the Brent population are from Black, Asian and minority ethnic groups. Brent's largest single ethnic group is the Indian population – who comprise 17% of residents – the fourth largest in London. Brent is the second most ethnically diverse borough in London, after Newham (according to the Simpson's Diversity Index).

Religion or belief

- The borough's three largest religious groups are Christian (41%), Muslim (19%) and Hindu (18%). Overall, 82% of residents had a religion – the fourth highest rate in England and Wales. The borough has the second largest Hindu population in England and Wales, and the 10th largest Muslim population (as a percentage of the population).

Sex

- The gender split in the population is 51% male and 49% female. The proportion of men is highest in the 20-34 age group where they comprise 54% of the population. In contrast, women make up a higher proportion of the Borough's elderly population: 62% of those aged 85 and over are female.

Sexual orientation

- Statistics about the size of the LGB population vary considerably and there is no single widely accepted measure. The 2017 GP Patient Survey found that 4.6% of Brent residents surveyed identified as Lesbian, Gay, Bisexual or 'Other' – below the London average (5.4%) but above the national rate (3.3%). Figures from the 2017 Annual Population Survey provide lower estimates for both London and England (3.2% and 2.6%).

3 IMPACT OF SAVING PROPOSALS

2020/21 budget proposals

A number of the proposed savings generate an income for the Council, or have other positive impacts on residents and communities, for example the Shared Fostering Services and Homecare re procurement , set out in further detail below.

Development of Shared Fostering Service (CYP004)

There is a national shortage of foster carers for children in care. The proposal is to continue to develop a joint fostering service in partnership with Ealing and Hounslow Council's and the voluntary sector. The aim is to recruit and retain a wider selection of in-house foster carers who can provide a stable family environment to looked after children with complex needs and those who are in high cost placements in the respective boroughs. Brent Council has been successful in receiving funding from the Department for Education to start a feasibility study. The future aim will be to roll this out to other members of the West London Alliance.

A positive impact is anticipated on protected groups, as through joint working and wider recruitment campaigns, there may be an increase in prospective foster carers from protected groups.

Adult Social Care re-commissioning - Homecare (CWB015)

Cabinet agreed on 11 November 2019 to retender homecare services in Brent, following a period of extensive consultation. Currently the council spends in excess of £18m per year on homecare, commissioning homecare services from 68 providers for adults and 32 providers for children.

The council is moving to a patch-based model for older people and physical disabilities homecare, meaning that providers would work over a smaller area. The borough is to be divided into 13 patches with a lead provider for each. For specialist homecare services (Learning Disabilities, Children and Young People with Disabilities and Mental Health) there would be two patches due to the smaller number of service users, with four lead providers for children with disabilities service, two lead providers for learning disabilities and two lead providers for mental health services. Lead providers in each patch would be required to deliver at least 80% of all hours in the patch. The aim is to end the practice of large numbers of providers delivering very low numbers of packages.

Homecare services are disproportionately accessed by older people and people with disabilities, including children. Equality implications have been considered throughout the review of homecare in Brent and have been a key focus in the development of the new service model and service specification, alongside quality of care.

The proposal should have positive impacts for all protected groups, but particularly for age and disability. Possible negative impacts have been addressed within the service model and specification. Positive impacts of the proposed model have been enhanced where possible. For example, specialist providers are being maintained to work with specific client groups, and zones have been developed to support providers understanding of local issues and relationship building with key partners, including a smaller number of GP practices. A patch based model should reduce travel distance for care workers. Securing hours should help providers with workforce planning, including

staff training and support, and improve the quality of care provided. Social workers would continue to assess service user's needs and be involved in support planning, and providers would state whether or not they could deliver the service to meet the individual's needs.

The proposed new service model will not remove services, but it will change the way services are delivered and will place greater emphasis on a personalised outcomes based approach. The new service model is expected to deliver improved quality of service provision, improved service user experience, and establish more productive working relationships with providers.

The proposal to re-tender homecare services includes paying care workers at the London Living Wage and minimising the use of zero-hours contracts. Paying the London Living Wage should help to improve staff retention. It is anticipated that the quality of homecare provision in the borough would be enhanced.

The re-tender is designed to ensure compliance with the Unison Ethical Care Charter, which includes regular training and visits of more than 15 minutes.

Consistency of care worker is something that the council and care providers are committed to, and it will be included as an element in performance and contract monitoring schedules. Service users would continue to be matched to care workers based on their needs, however the aim will be for a consistent care worker to provide care for each individual during the course of the contract (where possible). This will positively impact service users, as they may wish to have the same care workers. It should improve communication between the council and the provider and between the provider and the service user also.

Electronic Call Monitoring will be mandatory and will be built into the procurement process. This will allow for better real time monitoring of consistency of care worker and timeliness of calls, and will also allow contract monitoring to be evidence based.

Small Brent based providers may not have the ability to deliver the number of hours expected from the patch based approach. Smaller providers could still continue to deliver up to 20% of remaining hours from a framework. Approximately 10 additional providers will still be able to provide services for Brent by becoming part of a framework. Officers will provide capacity building support to local Brent providers to support them to join. Individuals may also choose to remain with them via a direct payment, however this would not be quality monitored by the council unless they were on a framework. Safeguarding concerns would continue to be investigated by the council however, and the council retains this responsibility. Smaller providers would still be able to deliver hours, reducing the risk of market failure also.

Impacts will be monitored throughout the implementation period and beyond via ongoing service user and provider engagement and the Quality Assurance Framework, the Outcomes Framework and Performance Management Framework that are included in the service specification and associated schedules. A Quality Assurance Policy is also being developed to minimise any negative impacts. A fewer number of providers will also ensure that quality can be better monitored.

Commissioners would attempt to limit disruption during the transition phase and ensure continuity of care where possible. However, if it is not possible to ensure continuity of care, the council and provider would work with service users to explain why, and help to build relationships with new carers as quickly as possible. Furthermore, service users could switch to a direct payment (DP) to give them more choice and control over their care.

Below is a summary of the full EIA's where a mixture of positive, neutral and negative impacts have been identified. Also attached to this report are the supporting EIA screenings for each savings proposal and full EIA's where implications on the PSED have been identified.

Community Wellbeing

Public Health recommissioning – substance misuse (CWB001)

The proposal is to achieve savings from the redesign and re procurement of the substance misuse service. A contract is already in place to deliver these savings.

No negative impacts are anticipated on protected groups. Service users were closely involved in the redesign of the service and the evaluation of tenders, and have been kept informed and involved in the process. Close attention will be paid to maintaining outcomes, and any impacts will be mitigated through contract management.

Public Health recommissioning - Stop Smoking Services (CWB003)

The proposal is to make the service more efficient by stopping the general untargeted smoking cessation services; but maintaining the focussed stop smoking service for mental health service users and pregnant women.

There is a general impact on smokers who would like to quit but do not fall within the focussed groups and would consequentially lose access to free nicotine replacement therapy and face to face support. The revised approach will have a positive effect on the protected characteristics, in particular by advancing equality of opportunity.

The service will focus on more vulnerable users where, for example, the health data supports a greater dependency on smoking, or significant health implications for example on foetal health. Non-eligible service users can access the free online and telephone support provided by the London Smoking Cessation Transformation Project and stop smoking medication such as Champix/Zyban as a GP prescription.

Adult Social Care re-commissioning - Placement review (CWB016)

This proposal is to reduce individual care package costs as part of annual placement reviews by moving people from high cost packages to supported living or extra care accommodation where appropriate and based on evidence as part of the New Accommodation Independent Living (NAIL) programme. Where this is not appropriate, the saving could be achieved by negotiating placement costs to achieve value for money instead. Placement costs are reviewed annually within the Residential and Nursing Commissioning teams.

Adult Social Care re-commissioning - Day care (CWB017)

This proposal is to work with providers to redesign and develop a new model of external day care provision. The aim of this proposal is to create efficiency savings whilst also supporting more choice and control for individuals in receipt of Adult Social Care services. It is proposed that the current model is transformed to less building based provision. It is anticipated that the overall level of service should stay the same in most cases, however some groups may find it challenging. Engagement would be undertaken with service users affected to minimise any negative impacts.

Adult Social Care re-commissioning - Prevention contracts (CWB018)

This proposal is to move non statutory Adult Social Care services to Public Health and include broader outcomes. The services would be re-specified and recommissioned through the Public Health grant. The number and level of services provided is not expected to change. No equality impacts are anticipated.

Housing Association Lease Scheme (CWB021)

The proposal is to create a new model to increase the supply of affordable accommodation to help meet the demand for homeless households. The contraction of affordable temporary accommodation in the borough is resulting in more homeless households being housed into emergency Bed and Breakfast and/or other forms of temporary accommodation outside of Brent. The Reasonable Rents model will enable Registered Providers (RP) to lease properties (at a more competitive rate) from the private sector and let them to our accepted homeless households.

The scheme will enable reasonable/more attractive rates to be paid to landlords, allow properties to be retained and the housing portfolio expanded at a reduced cost to the Council. This model will also enable the council to discharge its full housing duty to accepted homeless households. The proposal would only apply to newly accepted homeless applications.

Some protected groups are over – represented among homeless households. This is partly due to the criteria through which priority need is established, e.g. age, physical disability, mental health and or pregnancy.

Positive impacts are anticipated in relation to a reduction in the loss of properties available and an increase in the supply of affordable accommodation to help meet the homeless demand. The scheme would advance equality of opportunity in the way that it is a fair and transparent means of allocating homes, based on the needs to the applicant.

Positive and negative/neutral impacts have been identified for residents with a disability. Data analysis shows a higher proportion of households with disability or vulnerability indicators placed in temporary accommodation. This may be because of limitations in procuring accommodation in the private rented sector that can meet the needs of people with a disability. In order for the council to end its homelessness duty, an offer of suitable and affordable accommodation must be provided. This may mean that social housing is the only option for some households and they will continue to be placed in temporary accommodation while waiting for an offer. Applicants with a disability would continue to be placed in accommodation that is suited to their needs.

Regeneration

Dimming street lights (R&E001)

The proposal is to review highly localised lighting levels across all residential streets in the borough.

Negative impacts are not anticipated. Residents may notice lower lighting levels than expected at certain locations, however sufficient lighting levels would be maintained to meet the British Lighting Standard, as well as road safety and community safety expectations. Resident and visitor feedback on lighting levels via the council's Parking and Lighting Service would be acted on quickly. Consideration of any relevant risk factors and consultation with the residents most affected would take place, and we are working with our Community Safety colleagues to minimise any risks.

Building control (R&E004)

This proposal is increase the service area income from out-of-borough work and provide additional services through associates. There is a risk that the proposal might not be achieved if there is a downturn in the economy. No equality impacts are however anticipated.

Wembley licensing (R&E008)

This proposal is based on a potential increase in revenue arising from greater event activity in Wembley, subject to work on Olympic Way being complete. Equality Analysis was recently conducted for the Council's new Statement of Licensing Policy. When applications are received the Licensing Authority considers these on their individual merits and ensures that the Public Sector Equality Duty (PSED) is applied where appropriate. The Licensing Authority applies the PSED in the implementation of the 28 specific policies outlined in the Licensing Policy. The proposal would consider the PSED in licensing decisions where appropriate. No equality impacts are anticipated.

Regeneration & Environment staffing efficiencies (R&E018)

The proposal is to achieve savings through a reduction in staff salary costs. No equality impacts are anticipated.

Children & Young People

Development of Family Hubs (CYP008)

It is proposed to replace the 17 Children's Centres with 8 family hubs. Children's Centre hubs currently cater for children aged 0-5, whereas the family hubs cater for the entire family aged 0-19 (and 25 with SEND). Services provided by the Children's Centres will still be accessible through the family hub.

The impact will be more significant on vulnerable families that live close to the Children's Centres which are closed. They will not be able to access those support services and may experience longer /additional traveling in order to access the service. This will particularly impact those on low incomes and with disabilities or SEND. There will also be an impact on services provided by the midwifery team around ante-natal and postnatal support and health visiting service, as new mothers/parents will have greater difficulty accessing the support. There could be an increase in isolated young parents and postnatal depression.

Part of the mitigation is to ensure that the family hubs continue to deliver the service which were available at the Children's Centre. Hubs will be targeted in areas that have the highest usage and deprivation levels as well as considering the size and locality of the individual centres. Research based assessments will make the best use of resources and ensure that these are broadened to cover school age children. This will enable a greater reach for targeted services into families. With respect to isolation and additional travelling difficulties,

consideration will be given to sourcing assistance with travelling. The service will also undertake a further EIA as part of the consultation service redesign process.

Chief Executive

Reducing voluntary sector grants (PPP001)

The proposal is to:

- reduce the voluntary and community sector assistance budget by £80 000 over two years. This budget is used to fund Brent CVS who provide capacity development support to Voluntary Sector and Community organisations (VSCOs) within the borough;
- reduce the Brent Advice Partnership Funding by £127 000 over two years. This fund is used to develop the capacity of local advice services;
- reduce the generalist advice contract held by the Citizen's Advice Bureau (CAB) by £35 000; and
- reduce the specialist advice contract by £18 000 over two years . This contract is also held by the CAB.

The first year savings were successfully implemented from April 2019 onwards.

It is not anticipated that the reduction to the voluntary and community sector assistance budget and Brent Advice Partnership Fund would negatively impact protected groups. The funding does not impact directly on service provision. In addition, the organisations affected are either able to access funding from other sources or did not use all their allocated funding 2018/9, so the current funding level is more in line with their apparent needs.

The savings proposals to the CAB could negatively impact on the following protected groups who disproportionately access the service:

- older people (around 18% of CAB clients are over 65);
- disabled people (around 40% of CAB clients are disabled or long-term sick);
- BAME groups (around 70% of CAB clients were BAME in 2018);
- women (around 55% of CAB clients were female in 2018).

Given the disproportionate number of BAME groups and women accessing the service, it is possible that a reduction in service will have an impact on some faith groups and on the protected characteristic of pregnancy and maternity, although this data is not available.

Some protected groups may be more likely to be in need of benefits and other advice – for example, women and BAME groups who are likely to be on lower incomes.

Specialist advice services also provide support to vulnerable people for example home visits for older people and people with disabilities who are not able easily leave the house to access benefits and other vital advice.

The data also highlights increased demand for CAB services. 3049 people were seen during Quarter 2 for 2019/20 against an average of 2706 a quarter in 2018. There was also an increase in the proportion of clients from some protected groups; the proportion of BAME people increased to 90% from 70% in 2018/9 and there was an increase of people with disabilities and long term conditions to 45% from around 40%.

Mitigating actions include regular monitoring meetings with providers to assess impact and provide support in reconfiguring services to meet the needs of service users. Furthermore, Brent voluntary and community sector organisations would still be able to bid for money from the council's comprehensive grant funding programme. Council officers are enhancing the grants policy and procedures to make it easier for organisations to bid for funds. All information relating to grants is readily available on the Council website.

The Brent Advice Service Partnership would be enhanced to increase the use of alternative services able to provide advice to targeted groups in particular. In addition, Brent Council will continue to build the capacity of smaller and specialist advice services within the borough through training and development so that they are able to support service users that the CAB are not able to support. The online advice service would further be funded to provide advice to appropriate service users. The use of online information would be promoted, including Brent Advice Matters. Additional funding for advice by Children and Young People would also be available, and should be able to provide a service to some children, young people and families. The most vulnerable older and disabled people would also be targeted as part of the specialist advice service to ensure that they receive the best service possible.

There is a longer term plan for Brent Council to review and redevelop its relationship with the voluntary and community sector, including its contracted provision. Any proposals will be developed in consultation with the affected stakeholders.

Restructure of communications, conference & events department (PPP003)

This proposal is to carry out a staffing restructure to realign the service to maximise commercial income generated from the Conference and Events and income generation sections of the communications service while protecting core communications team activity which is required to support the priorities as identified in the Borough Plan 2023.

There are no equality impacts anticipated on protected groups. Equality implications will continue to be considered as the proposal develops.

Customer and Digital Services

Customer services staff rationalisation (RES005)

This proposal is to undertake a restructure in this area following the transfer of Council Tax to in house provision in May 2019. Consultation has taken place on the restructure of the service. Residents would be encouraged to access services online. Reductions in staffing may negatively impact residents who are not online. Older people are less likely to be confident in using digital service facilities. People with learning disabilities and people living with mental health issues may find it more difficult to use the digital service and require assistance or provision in another way. Users whose first language is not English may also find it more difficult to use digital self-service channels.

Support would continue be available for residents to resolve queries, including providing access to self-service facilities, training and assistance with accessing services through community hubs or provision of assistance in people's homes. A further EIA would be undertaken in relation to proposal as the new offer is developed.

Service Modernisation, More Digital (RES003/004)

There are two parts to this proposal (1) increasing the digital self-service provision by reducing/migrating face to face and telephone enquires (003). This will include utilising Robotic Processing Automation which will improve the current customer offer and address feedback arising out of the consultation process; and (2) launching a universal offer to all residents which will set an expectation to self-serve using digital channels (004) and a more tailored offer to vulnerable residents to ensure they have access to appropriate assistance.

No direct impact is envisioned by the first proposal as the robotic processing changes the way in which data is processed (thereby improving the service delivered).

In relation to proposal 2, there may be an impact on vulnerable users although the aim of the change is to better target assistance to those who most need it. Consequently, residents who can use self-service will be diverted to self-serve to enable the prioritisation of those service users that require additional support and or assistance. Older people are less likely to be confident in using digital service facilities, people with learning disabilities and people living with mental health issues may find it more difficult to use the digital service

and require assistance or provision in another way. Users whose first language is not English may also find it more difficult to use digital self-service channels.

Service users who need additional assistance will be identified through a broad framework which will help to determine the type of assistance they need and where this can be accessed. This may include providing access to self-service facilities, training and assistance with accessing services through community hubs or provision of assistance in people's homes. A further EIA may be undertaken in relation to proposal 2 as the new universal offer is developed.

Legal savings - Demand management (RES001)

This proposal is to achieve savings through demand management and income generation through raising new and existing fees and charges. Support would be reduced for contract and procurement activity on contracts which do not require formal tendering. A suite of basic contract and advice documents would be provided to support staff with this change. It is not anticipated that there would be any impacts on protected groups.

Council Tax Increase

It is proposed to increase Council Tax by 3.99% (2% ring fenced for Adult Social Care and 1.99% general increase). This will generate an additional 4.9m of recurring income for the council and avoid further savings having to be made to key council services.

This proposal will impact on all residents in the borough who are liable to pay Council Tax. As the increase has universal application no one particular group with protected characteristics is targeted.

In terms of mitigation, the Council Tax Support (CTS) scheme provides some assistance for vulnerable residents and households on low incomes. The CTS scheme is due to change in April 2020. Equality Analysis for the new scheme identified both positive and negative impacts for the protected groups of age, disability, sex and race. Overall, the impacts of the proposed scheme are broadly proportionate across groups with protected characteristics, and / or reflect the higher relative incomes of certain demographic groups. Mitigating actions include staff training to equip officers with the awareness to identify where a discretionary payment may be appropriate, and how such requests should be assessed, and opportunities to improve equality monitoring data. The impacts of the new scheme on claimants are being closely monitored.

The impact of the council tax increase would be reviewed alongside the implementation of the new council tax support scheme. The existing powers under Section 13A of the Local Government Act 1992 also allow the Council to reduce Council Tax by up to 100%. The process for applying is detailed on the Council's website.

2021/22 to 2022/23 budget proposals

Attached to this report are the supporting EIA screenings and full EIA's where implications on the PSED have been identified.

A number of the proposed savings generate an income for the Council, or have other positive impacts on residents and communities, for example proposals to increase in-house Temporary Accommodation, reduce damage to footways and to become a Registered Apprenticeship Training provider set out in further detail below.

Properties to relieve Temporary Accommodation (2021-23 CWB 006)

This proposal is to create social housing as part of the Council's new build programme. The proposal would involve redeveloping a former care home (Knowles House) into council-owned in-house temporary accommodation.

Page 150

Recent years have seen the contraction of affordable Temporary Accommodation in the borough resulting in more homeless households being housed into emergency Bed & Breakfast and/or other forms of temporary accommodation outside of Brent. The proposal will increase the in-house supply of temporary accommodation for homeless households, reducing the costs of obtaining accommodation externally.

Some protected groups are over – represented among homeless households. This is partly due to the criteria through which priority need is established, e.g. age, physical disability, mental health and or pregnancy. Positive impacts are anticipated from this proposal in relation to increasing the supply of accommodation to help meet the homeless demand, providing permanent properties for a number of homeless households currently in temporary accommodation. The proposal would support the council to discharge its full housing duty to accepted homeless households. It is also anticipated that the proposal would increase the supply of accommodation suitable for disabled households.

Damage Cost Recovery (2021-23 R&E 004)

The proposal is to deploy a dedicated officer to proactively recover the cost of repairs from developers and builders causing damage to the public highway. Contractors undertaking works will be charged and held accountable for the damage they may cause to footways in Brent.

It is anticipated that there would be more frequent footway repairs as a consequence of this proposal. Hazards may be removed, and footways be in better condition generally reducing the likelihood of accidents. This could positively impact residents, particularly those with protected characteristic of age, disability and pregnancy/maternity.

To develop a commercial training arm that can utilise the apprenticeship levy to deliver Apprenticeship Standards (2021-23 R&E 009)
The proposal is to become an Approved Training Provider of apprenticeship training, and therefore increase teaching capacity and the number and range of apprenticeship training offered.

The proposal is believed to have a neutral impact on protected groups overall. Existing apprentices would not be affected. Work would be undertaken with employers to ensure that there is equality in apprenticeship recruitment. Applicants would receive 1-2-1 support in completing applications if required and continued support through the duration of the apprenticeship.

The proposal would give the council greater flexibility to ensure reasonable adjustments can be made for applicants with disabilities, as opposed to more restrictive policies for independent training providers. This would allow us to offer a more inclusive and quality service. The proposal may therefore positively impact residents with the protected characteristic of disability.

Below is a summary of the full EIA's where a mixture of neutral and negative impacts have been identified.

Community Wellbeing

Reablement (2021-23 CWB 001)

The proposal is to deliver a more effective and comprehensive reablement offer that supports higher needs residents, discharges residents sooner, improves links with hospital and community social care teams to improve the resident journey and reduces or not requires ongoing homecare packages. Further savings have been identified through reducing the contribution Brent makes to the rehab (health) element of the service.

The aim of the reablement intervention is that residents will be able to live more independently. This allows the ongoing traditional community care package to be reduced or removed, depending on the ongoing care needs. The improvements in the service will be across the universal offer and it is not anticipated that protected groups would be affected disproportionately.

The council will continue to spot-purchase reablement homecare packages if the project of bringing the provision in-house is unsuccessful. Residents with disabilities with reablement potential will continue to be offered a service. As part of the project plan, a

Project Board would be also developed. Equalities analysis would continue to be undertaken as the proposal developed, with updates brought to the Project Board.

Placement Review (2021-23 CWB 003)

Placements are to be reviewed as part of the New Accommodation Independent Living (NAIL) programme to determine whether people could be moved to less restrictive placements, or whether there is any scope for fee reduction based on need and care provided.

It is proposed that some service users are supported to move into new placements better suited to their needs. Other placements would be subject to fee negotiation, if the client is unable to move, but where it is felt a fairer price for the service could be negotiated.

It is anticipated that there would be a positive impact on residents with a disability. The primary aim of moving someone from one placement to another is to move them to a service that better meets their needs. People would not be moved if it was not felt to be in their best interests.

Deprivation of Liberty Safeguards (DoLS) provision (2021-23 CWB 004)

The proposal is for Brent permanent staff to undertake the Best Interest Assessor (BIA) role as opposed to outsourcing at a cost of £250 per case. This would not only bring savings but also improvements for staff trained and act as an incentive for recruitment and retention.

It is not anticipated that provision would be affected by the changing of staff arrangements – the service is not expected to change as a result. The change is solely about reducing external commissioning and giving this opportunity to Brent staff. The proposal would provide more control over ensuring assessments are timely. Any risk to service provision would be mitigated by ensuring a budget allocation to still enable outsourcing in emergency situations or during staff absence.

Community Care recommissioning (2021-23 CWB 005)

The commissioning service is working with providers to redesign services into new, lower-cost models of care that support more choice and control, and promotes less building based provision. The proposal is to broaden the service offer and involve people in its design. Public Health outcomes would be built into the recommissioned service, with the aim of improving outcomes for service users and residents.

It is anticipated that the proposal would positively affect Adult Social Care service users that attend day centres. Older people, disabled people and people from Black, Asian and Minority Ethnic (BAME) backgrounds are likely to be affected.

The make-up of service users is currently being reviewed. All services are being reviewed, including services for Afro–Caribbean and Asian elders. Equality implications are being considered throughout. Services are being reviewed to establish if they could be delivered in a different way, with recommendations due to be made to the Change and Improvement Board. Some of these may include the removal of some of the services. However these services would continue to be delivered by private providers, but with less clients funded by the council or input from council staff. Service users will be offered direct payments so that they can purchase their own services if they do not believe that the service offered by the council meets their needs. Staff are working with all stakeholders including family's and service users where they have capacity.

Any service change would be subject to the agreement of senior management and Cabinet. It may lead to the services being improved for residents by offering service users more choice and control, modern and targeted service provision based on different service users' needs.

New Accommodation for Independent Living (CWB013)

The proposal is to increase NAIL provision to support more users and to develop provision to support higher need users and some users who have gone into nursing care. Despite successful demand management within ASC, the number of people requiring and who are eligible for services is increasing. Therefore we are proposing increasing the number of NAIL units we develop to help mitigate the cost pressure of this demand, but also developing specialist provision to cater for people who might otherwise have needed nursing care. No equality impacts are anticipated.

Children and Young People

Clawback of unused Direct Payments 2021-23 CYP 001

Direct payments are cash payments paid to an individual to give them greater choice to buy care services needed themselves. The proposal is to introduce a card system in April 2020 to reclaim unused or overpaid direct payment funds from clients immediately, matching the same approach taken in adult social care. The direct payment may no longer be required by families or it may not be used in line with the resource allocation agreement signed. It also may be paid for several months before it is amended. The card systems would allow officers to identify overpayments and claim these much more rapidly.

Consultation has taken place with residents affected by the change and with the Brent Parent Carer Forum. Children and young people with assessed needs would continue to receive support as detailed in the legislation. Some of the children and families who are not using

the direct payment in line with the service agreement would see their payment reduced or cancelled. More appropriate support would be offered to families, which could include activities in the community, play schemes or care at home depending on the review of their assessment. It is also noted that some of the parents affected may be pregnant at the time of implementation also. Impacts would be monitored during 2020/21.

Short Break Centre (2021-23 CYP 002)

The proposal is to sell existing spare capacity of respite beds/nights at the Ade Adepitan Short Breaks Centre to neighbouring authorities at market rates. The aim of the proposal is to increase income by reducing the number of empty beds through providing planned and emergency accommodation at market rates to neighbouring boroughs.

There should be a minimal impact on users of the service. The sale of extra bed nights would bring more users to the centre. There is currently surplus capacity and some bed nights are already sold to neighbouring boroughs. LB Barnet has already purchased additional bed nights and is due to sign a formal contract to regularise arrangements before the end of 2019.

Page 154

There is no intention to reduce the number of opportunities for Brent resident young children and young people – the proposal is to better utilise existing capacity that is not required by the service. Consultation with service users, their families and the Brent Parent Carer Forum has taken place with positive feedback obtained. The proposal does not involve any reduction in services for Brent young people. There could be a risk of Brent young people not being able to access this service if too many bed nights are sold. The process would need to be managed sensitively in order to bring social benefits to existing users.

Adjusting resources in demand led budgets (2021-23 CYP 003)

The rate of Looked After Children (LAC) per 10,000 of population is historically low in Brent and the current rate is low compared to statistical neighbours. With the assumption that this low rate continues over the next 18 months a reduction in the budget could be implemented in line with posts that were held vacant in August 2019.

Population growth is expected to stabilise following the current primary bulge moving through the school system. A number of activities as set out in the current borough plan are intended to improve outcomes and manage risk effectively for target groups at higher risk of becoming looked after.

If the caseloads do not increase, it is not anticipated that there will be any negative impacts on protected groups. However, there is a risk that caseloads rise as the number of secondary-age children increases. 65% of current LAC are aged 13+. The proposal could negative impact on the young people as if there is insufficient staff resource to meet demand, issues relating to contextual safeguarding and serious youth violence may accelerate complexity of need.

To mitigate against any negative impacts, the LAC rate would be monitored quarterly within existing performance reports. Service users and staff would be kept regularly informed and their views sought through internal mechanisms. A decision would need to be made by the service by early 2021 regarding the resource required to meet demand for the subsequent two financial years. If the rate increased, this proposal would not be achieved as it would negatively impact on service delivery.

Review and zero base other service area budgets (2021-23 CYP 004)

The proposal is to review service area budgets to achieve and accumulate minor savings. Budget analyses will be carried out on non-staff and non-frontline service budgets across Children and Young People. Management will then challenge budget holders to produce updated service delivery plans, focussed on outcomes which can be costed by the Finance team.

Proposal is to concentrate on those budgets which have a historical underspend. No negative impacts have been identified for children and young people, parents/carers, schools and practitioners working with children and young people.

Increased income target for the Gordon Brown Centre (2021-23 CYP 005)

The Gordon Brown Outdoor Education Centre has benefitted from recent capital investment. The proposal is to increase access to this resource by extending the use of the centre, including by selling daytime and residential activity bookings, and thus increase income generated.

The management teams have engaged with local schools and potential customers regarding the proposal. The planned income generation will be reviewed quarterly through 2019/20 and into 20/21. Negative equality impacts have been not been identified. Impacts will however be monitored through management supervision of the centre manager.

10% saving on commissioning (2021-23 CYP 006)

This proposal is to achieve a 10% commissioning saving when contracts become due for a number of commissioned services that either support children with special needs and disabilities or vulnerable children and young people.

A number of contracts have been identified which are due to go out to tender and commence in April 2021. The services affected would likely include Speech and Language Therapy, Mental Health and Wellbeing, semi-independent block contract for services, and Early Help services. The saving would be achieved by:

- retendering services to achieve competitive pricing;
- bringing any spot-purchased services into contracts where possible to achieve economies of scale;
- redesigning services to achieve efficiencies based on feedback from service users and demand analysis.

The protected groups that could be affected are age and disability. The proposal may impact children and young people aged 0-18 and 18-25 with an Educational Health and Care Plan (EHCP), parents and carers, schools and practitioners working with children and young people.

The scope of non-statutory services may be reduced. Negative impacts are not anticipated. The focus will be to ensure that the most vulnerable children and young people and their families continue to be supported through commissioned services. Children who have a statutory right to services would continue to receive them. It is not anticipated that services aimed at supporting vulnerable children (e.g. Mental Health and Wellbeing services or Early Help services) will reduce in terms of scope, but that market competition will drive efficiencies. There could, however, be some redesign of services for example to increase alignment with CCG commissioned services which could drive efficiencies. Any redesign would be informed by service user feedback and detailed demand analysis.

The same age range of children and young people would continue to receive services. Statutory services for children and young people with a disability would also continue. Non-statutory services would continue to be available for children and young people regardless of whether they have a disability. All services would continue to impact equally upon all children and young people and their parents/carers regardless of their gender identity, race, religion or belief, sex and sexual orientation. Services are fully inclusive and aim to improve outcomes for all children and young people and their families.

Engagement would be undertaken with stakeholders and service users at the point of recommissioning any service. All commissioned services are subject to contract monitoring and evaluation. This includes regular feedback from service users, monitoring complaints and compliments, service data analysis and contract monitoring meetings. The Commissioning Team hosts a quarterly stakeholder meeting that reviews service effectiveness and informs contract monitoring meetings. Each service would be recommissioned based on an updated and detailed analysis of service need, including the views of target user groups.

The commissioning of services in scope of the budget savings proposal will be undertaken to achieve efficiencies primarily through market engagement and through improved alignment with CCG commissioned services. It is not intended that the scope of any service would reduce unless this is underpinned by analysis that indicates reduced demand. All services that are commissioned are subject to detailed analysis of demand. If a service is no longer required or if a reduced service is considered appropriate to meet need, the opportunity will be taken to realise budget savings.

Demand analysis for each service will be carried out, including evidence of impact of current services. Consultation with children and parents/carers on specifications would take place. Market testing and market development would be used to determine market likelihood to respond to tendering process in the context of the specification and available budget. Each proposal would be subject to a detailed equality impact assessment to mitigate any negative impacts.

Regeneration and Environment

General Efficiencies across R&E (2021-23 R&E 001)

The proposal relates to the removal of funds deemed to be surplus to the structural revenue requirement of the directorate. No impacts are anticipated on residents from protected groups.

Lighting Maintenance (2021-23 R&E 002)

This proposal is to make an efficiency saving of 10% on the lighting maintenance budget in March 2021. This follows a 20 year lighting maintenance contract, £5 million investment in technology and two years trouble-shooting. This 10% efficiency saving is a corporate requirement on all contract re-letting and renewals. It is not anticipated that there will be any negative impacts on protected groups.

Schemes/Drainage fees (2021-23 R&E 003)

The proposal is to increase the level of fees applied to contractors for the delivery of large-scale funded infrastructure improvement projects. No impacts are anticipated for protected groups.

Building Control Fees Review (2021-23 R&E 005)

The proposal is to increase building control fees charged to developers by 10% for schedule 2 new dwellings, up to 15 dwellings. No impacts are anticipated for protected groups. No impact on residents is anticipated.

Passenger Transport (2021-23 R&E 006)

The proposal is to relocate parking provision of buses for Special Educational Needs (SEN) children from Harrow to Brent in order to shorten routes and reduce driving times, and therefore to create efficiency savings. It is believed that efficiencies can be made on certain routes. The proposal would affect 900 SEN children who currently use the service. Equality monitoring information will be reviewed for passengers affected.

The proposal is likely to have negative impacts on the protected group of disability and age (young people) as SEN children are likely to be affected by changes to individual routines, which can cause anxiety. Carers, whilst not protected themselves under the Equality Act 2010, are protected from indirect discrimination if they are caring for someone with a disability. Parent carers of SEN children are also likely to be affected by this proposal as their children would be affected. However in the long-term it is believed that there will be a positive impact for these groups due to shorter journey times and therefore better comfort for passengers. Negative impacts from the changing of routines in the short-term are likely to be mitigated by the long-term outcome of reducing journey times.

Page 158

Mitigating actions include starting any new routes from September 2020 to coincide with the new school year, thus minimising the number of changes to routine caused by service disruption during term-time. Furthermore, only those routes that would provide operational efficiencies and a saving would be re-located.

Passengers would be consulted on the proposed changes early in 2020 and the proposal is subject to the consultation findings. The consultation would be promoted amongst all service users and their families. Any changes would be communicated sensitively, thoroughly and early in advance to minimise any anxiety caused to passengers. In accordance with the NHS Accessible Information Standard, information would be communicated in a simple and clear way, for example using Easy Read, to ensure that the information and communication needs of passengers affected with a disability are met. Equality analysis would continue to be conducted and reviewed, and any impacts monitored. Equality monitoring information will continue to be reviewed for passengers affected.

Additional pre-application charges for specialists (2021-23 R&E 007)

The proposal is to increase the pre-application charge for specialist advice in the planning process/service, where it is believed an additional charge could be levied with agreement from the applicant. A wide range of applications from small householder to major urban developments are received. Equality information is monitored for planning applications but not for pre-application stage.

The proposal is not envisaged to impact protected groups as the charge would mainly affect larger commercial operators and development proposals rather than domestic residents or smaller schemes (e.g. extensions to homes or small businesses). The proposal would exclude certain categories. Disabled people would not be affected e.g. they would be able to improve their homes without a planning fee. Households would have free application so would not be negatively affected. Disabled residents (e.g. if trying to make home more accessible) would not be affected. It is not believed that residents with a protected characteristic would be negatively impacted by this proposal. Equality Analysis has been conducted for the proposal and will continue to be kept under review.

Facilities Management contract extension (2021-23 R&E 011)

The proposal is for a 12-month extension to the existing Facilities Management contract, with savings of £70k agreed at the time of extension. The proposal includes the reduction of a security post by our outsourced contractor, with duties of that officer being picked up by the remaining nine team members.

The proposal is also for the outsourced contractor to use technology to remotely open and close Brent Council buildings that fall within Facilities Management (approx. 15-20 buildings). There are many buildings which use this technology already.

The impact on residents and staff is likely to be minimal. The process will remain the same. Rather than locking and unlocking the buildings by human intervention and use of a key, the lock would be released over a network instead. There wouldn't be an announcement that the lock was about to take place as this is not possible. Members of the public would be directed to leave the premises by Brent Council staff however as currently occurs before the buildings are locked. A communications plan would be developed to increase awareness of the technology. New staff would continue to be informed as part of their site induction when they are expected to vacate the building by and lone working procedures.

They would continue to be able to use their staff card to exit the building before the locking takes place, and enter the building after the opening takes place. There have been 1-2 staff locked in the premises within approximately 4 years. The proposal is make the process more efficient and safer as in emergency situations staff would be able to release the lock and override the system (currently a key is needed to unlock the lock). This would be reported back to the control room. There isn't currently CCTV linked to the control centre, although this could be a future consideration for The Library at Willesden Green.

The proposal would be subject to a building stakeholder consultation. Lock height would be accessible for wheelchair users at waist height. No personal data is involved in the locks and therefore a data protection impact assessment is not believed to be needed.

The proposal is to undertake a trial with one building and review after 6 months, before rolling it out in the medium term where appropriate. Any problems or unforeseen consequences would be reviewed and the contractors would work in partnership with Brent Council to mitigate them. A notification process would be in place for late events, and in this circumstance lock times would be changed.

Customer and Digital Services

ICT Client and Applications income generation from sale of IT support services (2021-23 CDS 001 & 002)

This proposal is to increase income by raising IT support charges and potentially increasing the number of organisations supported. Any risk of adverse impact to service delivery will be mitigated by increasing staff as required, but ensuring these costs are met from the income generated. It is not believed that there will be any impact on residents from protected groups.

ICT Client and Applications reduction in support services (2021-23 CDS 003 & 005)

This proposal is to reduce printing usage across the council where there is scope to do so. It is not believed that there will be any impact on residents from protected groups. The proposal is internal to the council. Printing will still be available to all council staff.

ICT Client and Applications staffing efficiencies (2021-23 CDS 004)

The proposal relates to staff restructure and the reduction of one management post and one Database Administrator Post. It is anticipated that there will be a reduction in technical resources and ongoing support needed alongside an anticipated move to Cloud services. Risk of adverse impact to service delivery would be mitigated by gradual implementation of changes and allocation of work between other managers in the team. It is not believed that there will be any impact on residents from protected groups.

Merger of Housing and Corporate Contact Centres (2021-23 CDS 006)

The proposal is to merge the housing and corporate contact centres, rationalise management and create staff efficiencies. The aim of the proposal is to create one 'front door' and a consistent customer experience for residents with resources based on needs and resident preferences. Staff working across the contact centres would be affected as well as key partners such as repair contractors. The proposal is not believed to impact residents at this early stage. It is believed that the change would enhance service delivery by creating a consistent customer experience for residents.

A detailed project plan will be developed to highlight the scope of the project, expected benefits and anticipated impacts on customers. Segmentation analysis will be carried out to understand customer base and assess the impact of changes to staffing level. Data will be collected to understand call demands and customer profile in terms of protected groups.

Equality Analysis would continue to be conducted on an ongoing basis as the proposal develops, including the detail of the new service design. The new service design would be informed by service user engagement. The impact of the new service arrangements would be monitored through management reports post-implementation. Support for vulnerable customers would continue and would be a key feature of the new service design.

Reduction in postal costs (2021-23 CDS 007)

The proposal estimates a reduction of postage costs from increased online channels for residents and digital self-service. The council is undertaking work as part of its Digital Strategy and Customer Access Review to make it easier for residents to complete transactions online. The Brent Resident Attitudes Survey 2018 highlighted that older people, people with a disability and lower socio-economic groups are less likely to be online. It is not anticipated that residents would be negatively affected by this proposal, as residents who are not online will continue to receive support to access services. This includes face-to-face support from staff at the Brent Hubs. Equality Analysis was conducted for the overall Digital Strategy and this is being reviewed on an ongoing basis.

BCS - Savings from new Council Tax Support scheme (2021-23 CDS 008)

Please read this proposal summary in conjunction with 2021-23 CDS 011.

The proposal relates to the savings to be made from the new Council Tax Support (CTS) scheme, which was approved by Cabinet in November 2019, for which a full Equality Analysis was conducted and mitigating actions developed. It is expected that there will be no impact on protected groups. The new process for claiming CTS is expected to be simpler and easier. The proposal is also anticipated to create opportunities for greater automation. Impacts on residents affected by the proposal are being monitored closely and kept under review. Options for paying in person and/or by telephone will remain for customers.

Increased automation (2021-23 CDS 009)

The proposal is to increase the automation of council processes to improve data quality, and therefore increase processing efficiency, accuracy and consistency of decisions. Automation solutions are already being used as part of the Council's operations, including in Digital and Customer Services. Appropriate checks would be put in place to ensure the integrity of data handling. The proposal will

enable consistency and minimise the risk of adversely affecting customers from protected groups. Equality analysis has been conducted for the use of automation and equality impacts will continue to be monitored.

Replace online benefits form with a more agile solution to improve customer experience (2021-23 CDS 010)

The proposal is to replace the online benefits form used in the Benefits Service currently with a more agile solution to improve customer experience. The council already utilises an online form for claimants to make initial claims and report changes in circumstances. Equality analysis has been carried out for online claiming. The aim is to achieve a more cost effective solution.

The current form uses Risk Based Verification (RBV) software to determine how much evidence is required from a claimant to support their claim. It is anticipated that with the continued rollout of Universal Credit, the number of claims will reduce, as claimants move from Housing Benefit to Universal Credit caseload, and therefore the number of changes in circumstances to process will also reduce. The new Council Tax Support scheme to be introduced from April 2020 also uses a significantly simpler claim process, with less need for evidence from claimants as more verification from DWP and HMRC will be utilised. It is therefore anticipated that in the future there will be less or benefit to be gained from differentiating claims on a risk basis as many of the “higher risk” claims will have migrated from HB to UC.

A simpler and cheaper alternative e-claim (whether from a third party or internally developed in MS Dynamics) would therefore be developed and potentially a move away from RBV or introduction of a simpler and cheaper variation of this. Data from established management reports have provided a view of the key risk indicators to bear in mind as part of the transition to an alternative solution.

The simplified CTS scheme has the potential for robotic automation to transfer data from the e-claim directly into the Council Tax system. Savings would be achieved through cheaper alternative systems (or completely stopping use of RBV), plus 1FTE staffing saving from the potential robotic process.

There is not expected to be any impact on service users due to these changes; rather the benefits claim process and administration is expected to be improved as the proposed scheme is expected to be simpler to administer and easier to understand, with significantly fewer changes in circumstances needing to be reported and processed. The process itself is not proposed to change and the service will be no more or less accessible. The benefits claim process and administration and overall customer service is expected to be improved as a result. Additional support will continue to be offered for accessing online services to those who require it through Brent Customer

Service Centre, the Community Hubs and partners such as Citizens Advice and Housing Association welfare advisers. Equality Analysis will be continue to be carried out should the proposal be taken forward.

BCS - Staffing efficiencies (2021-23 CDS 011)

Please read in conjunction with proposal 2021-23 CDS 008.

This proposal is to achieve savings through staffing efficiencies by streamlining or simplifying processes and improving joint handling of queries between Benefits and Council Tax. As Universal Credit is rolled out, staff efficiencies are expected. The Benefits Service is currently reducing staffing costs by approximately £200k each year up to 2023/24. The CTS Scheme is expected to become easier to administer, and the council's debt recovery system is expected to become more streamlined. New technology is being considered for simple high volume activities.

The proposal would impact staff processes internally and the customer-facing part of the service would be unchanged. There is not expected to be any impact on residents. The aim of the proposal is to improve service delivery. Customer service is expected to be improved.

Equality Analysis will be conducted as the proposal develops, including the detail of the new service design. Analysis is being conducted to understand customer demand and make-up. A key feature will be to ensure that changes to staffing levels do not disproportionately negatively affect protected groups. Management reports will be developed to monitor the impact of the service post-implementation.

Transformation staffing efficiencies (2021-23 CDS 012)

The proposal is to reduce one management post following the merger of Customer and Digital Services. Workload and service demands would be redistributed across the management team. Risk of impact to delivery of transformation work programme will be mitigated by gradual implementation of changes and re-alignment of work between other managers in the team. There is not envisaged to be any impact from this proposal on residents.

Chief Executive's Departments

Efficiency savings proposals (2021-23 CE 001/2/3)

The proposal aims to achieve efficiency savings and income generation in the Legal team, Human Resources, Audit and Investigations, Finance and the Assistant Chief Executive department. The proposals are to:

1. Reduce external Internal Audit hours through re-procurement and utilising finance resource through rotations.
2. Full cost recovery from external.
3. Restructure of vacant posts in a Legal team.
4. Rationalise Occupational Health checks on recruitment. Checks would remain for staff with the protected characteristic of disability.
5. Re-procurement of Legal Library provider which provides document storage.
6. Review the structure of the admin support across the council and centralise core elements within the Executive & Member Services function in 2021/22.
7. Restructure the Conference and Events team to generate more income.

It is not expected that there will be impacts on residents from these changes. The changes are anticipated to affect staff only. Proposals relating to staffing restructures will be managed through the Managing Change policy. The services will also undertake further EAs as part of the service redesign process.

In relation to point six, the aim is to generate more income in the Conference and Events team, for example by increasing money generated from commercial events. Community and voluntary groups receive a reduction in the cost of hiring Brent Council spaces when compared to businesses. It is not anticipated that these groups would face increased charges.

Page 164

3 CUMULATIVE IMPACTS

Table 1 and 2 below summarises the potential cumulative impacts on groups which have a protected characteristic.

2020/21 budget proposals

A significant number of the proposals support income generation either by way of service design or introducing new initiatives which will have a positive impact on residents, communities and service delivery.

The proposals Adult Social Care Re-Commissioning – Day care (CWB017) and Reducing Voluntary Sector Grants (PPP001) could cumulatively negative impact on people from BAME backgrounds, older people and people with disabilities. For the proposal Adult Social Care Re-Commissioning – Day care (CWB017) it is believed that the impact could be neutralised and offset by mitigating actions. For

Reducing Voluntary Sector Grants (PPP001) mitigating actions have been put in place, including enhancing our grants policies and procedures to make it easier for organisations to bid for funds.

The proposals Children's Centres (CYP008) and Reducing Voluntary Sector Grants (PPP001) could further cumulatively impact on women, and the protected characteristic of pregnancy and maternity. The proposal Reducing Voluntary Sector Grants (PPP001) could impact on the protected characteristic of religion or belief.

However, these impacts will be kept under review and where possible mitigations have been identified to reduce the effect as set out below and in the individual savings descriptions.

In light of the above, the proposed budget saving proposals are considered reasonable and have shown due regard to the PSED.

Although initial equality screenings have been undertaken to ascertain the PSED impact, many of the proposals are in their formative stages and are still to be developed and or subject to consultations. Consequently, as the proposals are developed further equality analysis will be undertaken to assess the PSED.

Table 1 - 2020/21 budget proposals - summary of equality impacts

Proposal	Age e.g. children, elderly	Disability	Gender Reassign ment	Marriage or Civil Partnership	Pregnancy or maternity	Race	Religion or Belief	Sex	Sexual Orientation	Service Area
Public Health re-commissioning (CWB001)	0	0	0	0	0	0	0	0	0	CWB
Public Health re-commissioning - cease untargeted smoking cessation (CWB003)	0	+1	0	0	+1	+1	0	0	0	CWB

Adult Social Care re-commissioning – Homecare (CWB015)	+1	+1	0	0	0	+1	0	0	0	CWB
Adult Social Care re-commissioning – Placement review (CWB016)	0	+1	0	0	0	0	0	0	0	CWB
Adult Social Care re-commissioning – Day care (CWB017)	+1	+1	0	0	0	0	0	0	0	CWB
Adult Social Care re-commissioning – Prevention contracts (CWB018)	0	0	0	0	0	0	0	0	0	CWB
Housing Association Lease Scheme (CWB021)	0	+1 and -1	0	0	0	0	0	0	0	CWB
Dimming street lights (R&E001)	0	0	0	0	0	0	0	0	0	REG
Building control (R&E004)	0	0	0	0	0	0	0	0	0	REG

Wembley licensing (R&E008)	0	0	0	0	0	0	0	0	0	REG
Regeneration & Environment staffing efficiencies (R&E018)	0	0	0	0	0	0	0	0	0	REG
WLA Shared Fostering Service (CYP004)	0	0	0	0	0	0	0	0	0	CYP
Children's centres (CYP008)	0	0	0	0	-1	0	0	0	0	CYP
Reducing voluntary sector grants (PPP001)	-1	-1	0	0	-1	-1	-1	-1	0	PPP
Restructure of communications, conference & events department (PPP003)	0	0	0	0	0	0	0	0	0	PPP
Customer services (RES003 & RES004)	+1	+1	+1	+1	+1	+1	+1	+1	+1	CDS
Customer services (RES005)	0	0	0	0	0	0	0	0	0	CDS
Legal savings - Demand	0	0	0	0	0	0	0	0	0	LHRAI

management (RES001)										
Overall Council Tax increase of 3.99%	0	0	0	0	0	0	0	0	0	Council Tax

2021/22 – 2022/23 budget proposals

Positive impacts have been identified for the protected groups of age, disability, pregnancy or maternity and religion or belief, as highlighted in Table 2 and outlined in the EIAs.

The proposals Clawback of unused Direct Payments (CYP001) and Brent Transport Services move (R&E006) could have a cumulative negative equality impact on families with disabilities. However, any impacts will be monitored and communication will be made sensitively to ensure that service users and carers are fully aware of the changes. The introduction of the new passenger service for Special Educational Needs children would also take place at the start of the new term to minimise disruption.

At this stage the impacts are considered to be medium to low as a range of mitigating actions have been and will be put in place to reduce the negative impacts and ensure the Council's commitment to making a real difference to the lives of local people is achieved.

A significant number of the proposals support income generation either by way of service design or introducing new initiatives which will have a positive impact on residents, communities and service delivery.

Although initial equality screenings have been undertaken to ascertain the PSED impact, many of the proposals are in their formative stages and are still to be developed and or subject to consultations. Consequently, as the proposals are developed further equality analysis will be undertaken to assess the PSED.

Table 2 - 2021/22 to 2022/23 budget proposals - summary of equality impacts

Proposal	Age e.g. children, elderly	Disability	Gender Reassign ment	Marriage or Civil Partnership	Pregnancy or maternity	Race	Religion or Belief	Sex	Sexual Orientation	Service Area

Improved Reablement offer (CWB001)	0	0	0	0	0	0	0	0	0	CWB
Placement Review (CWB003)	0	+1	0	0	0	0	0	0	0	CWB
Deprivation of Liberty Safeguards provision (CWB004)	0	0	0	0	0	0	0	0	0	CWB
Community Care recommissioning (CWB005)	+1	+1	0	0	0	0	0	0	0	CWB
Properties to relieve Temporary Accommodation (CWB006)	0	+1	0	0	0	0	0	0	0	CWB
New Accommodation for Independent Living (CWB013)	0	0	0	0	0	0	0	0	0	CWB
Clawback of unused Direct Payments (CYP001)	0	-1	0	0	0	0	0	0	0	CYP
Short Break Centre (CYP002)	0	+1	0	0	0	0	+1	0	0	CYP
Adjusting resources in demand led	0	0	0	0	0	0	0	0	0	CYP

budgets (CYP003)										
CYP cross-service (CYP004)	0	0	0	0	0	0	0	0	0	CYP
Increased income target for the Gordon Brown Centre (CYP005)	0	0	0	0	0	0	0	0	0	CYP
10% saving on commissioning (CYP006)	0	0	0	0	0	0	0	0	0	CYP
General Efficiencies across R&E (R&E001)	0	0	0	0	0	0	0	0	0	R&E
Lighting Maintenance (R&E002)	0	0	0	0	0	0	0	0	0	R&E
Schemes/Drainage fees (R&E003)	0	0	0	0	0	0	0	0	0	R&E
Damage Cost Recovery (R&E004)	+1	+1	0	0	+1	0	0	0	0	R&E
Building Control Fees Review (R&E005)	0	0	0	0	0	0	0	0	0	R&E
Brent Transport Services move (R&E006)	+1 and -1 (children)	+1 and -1 (SEN)	0	0	0	0	0	0	0	R&E
Pre-app service; review basic and	0	0	0	0	0	0	0	0	0	R&E

enhanced offer (R&E007)										
Apprenticeship levy commercial offer (R&E009)	0	0	0	0	0	0	0	0	0	R&E
Facilities Management contract review (R&E011)	0	0	0	0	0	0	0	0	0	R&E
ICT Client and Application support - Income generation (CDS 001/2)	0	0	0	0	0	0	0	0	0	CDS
ICT Client and Application support - Printing Costs & Oracle changes budget (CDS 003/5)	0	0	0	0	0	0	0	0	0	CDS
ICT Client and Application support – Salaries (CDS004)	0	0	0	0	0	0	0	0	0	CDS
Merger of Housing and BCS contact centre (CDS006)	0	0	0	0	0	0	0	0	0	CDS
Reduction in Postal Costs (CDS007)	0	0	0	0	0	0	0	0	0	CDS
Savings from new Council Tax	0	0	0	0	0	0	0	0	0	CDS

Support scheme (CDS008)										
Increased automation in Customer Services (CDS009)	0	0	0	0	0	0	0	0	0	CDS
Replace IEG online benefits form (CDS010)	0	0	0	0	0	0	0	0	0	CDS
Staffing efficiencies in Customer Services (CDS011)	0	0	0	0	0	0	0	0	0	CDS
Transformation - Staffing efficiencies (CDS012)	0	0	0	0	0	0	0	0	0	CDS
Efficiency savings within Legal, HR, Audit & Investigations/Finance/ Assistant Chief Executive (CE001/2/3)	0	0	0	0	0	0	0	0	0	CE

4 SOCIO – ECONOMIC IMPLICATIONS

According to the Brent Resident Attitude Survey 2018 (Lower income defined as residents living on household incomes below £20,000 per year, after tax and deductions); certain groups within the population are more likely than others to live in poverty. In Brent, survey

analysis shows that those living on lower incomes are more likely to be: those from Black ethnic groups; residents with a disability or long-term illness; older residents; those with no qualifications; those who are not in work; and those who live in social housing.

2020/21

The proposals regarding Children's Centres (CYP008), Reducing Voluntary Sector Grants (PPP001) and Increasing Council Tax cumulatively have the potential to negatively impact on families and residents from lower socio-economic groups. Some of the proposals will be mitigated by more effective working with partners to ensure resources are used effectively, retaining statutory parts of the service and the consideration of assistance/transitional protection where feasible. However, these risks which primarily affect women in lower socio –economic groups will need to be carefully monitored and considered across the council.

2021/22 to 2022/23

The proposals regarding Clawback of Unused Direct Payments (CYP001), Community Care recommissioning (CWB005) and Increased Automation in Customer Services (CDS009) cumulatively have the potential to negatively impact on residents from lower socio-economic groups.

Some of the proposals will be mitigated by early and accessible communication with residents affected, by continuing to offer support for vulnerable residents who are not online, for example through the Brent Hubs and digital assistance, and more effective working with partners to ensure resources are used effectively. Furthermore, the CYP003 proposal is subject to demand/the number of Looked After Children, which is being monitored. The risks, however, will need to be carefully monitored across service areas.

5 STAFFING IMPLICATIONS

Of those proposals put forward, several have staffing implications arising from staff restructures or service redesign. Where there are staffing implications for a third party, the Council will work with the third party organisation to ensure that the equality implications are understood and appropriate steps taken to minimise any adverse impacts.

To mitigate against staff redundancies, a number of the proposals will achieve a reduction through giving up vacant posts or through natural turnover. In these cases, it is considered that there will be no impact on characteristic groups.

For proposals where there is a reduction in the number of posts and redundancy implications, a meaningful assessment on the equality impact is not possible at this stage as no individuals and therefore protected characteristics have been identified for assessment.

Equality Impact Assessments in these cases will be carried out closer to the time of the start of the restructure. It should also be noted that where proposals do involve a reduction in FTE posts, in all cases these are less than 5 in number.

As further proposals which impact staff are developed further equality analysis will be undertaken.

Appendix C(v) – Individual Equality Analyses of Budget Proposals

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Individual Equality Analyses of Budget Proposals

This document:

- outlines the equality implications of individual budget proposals for 2020/21 and 2021/22 – 2022/23.on equality and socio-economic groups;
- sets out the mitigating factors and monitoring arrangements put in place;
- informs the equalities implications section in the Budget and Council Tax report for proposals relating to 2020/21 and 2021/22 – 2022/23.

The equality analyses in this report are subject to change in response to alterations to any of the individual budget proposals.

Summary of 2020/21 budget proposals

The table below sets out the equalities analysis for individual savings proposals for 2020/2021 against each service area:

Service Area	Index	Description	Full EA completed	Page no.
CWB	CWB001	Public Health re-commissioning – substance misuse	No	6
CWB	CWB003	Public Health re-commissioning - cease untargeted smoking cessation	Yes	7
CWB	CWB015	Adult Social Care re-commissioning – Homecare	Yes	13
CWB	CWB016	Adult Social Care re-commissioning - Placement review	Yes	27
CWB	CWB017	Adult Social Care re-commissioning - Day care	Yes	33
CWB	CWB018	Adult Social Care re-commissioning - Prevention contracts	No	39
CWB	CWB021	Housing Association Lease Scheme	Yes	40
REG	R&E001	Dimming street lights	No	54
REG	R&E004	Building control	No	56
REG	R&E008	Wembley licensing	No	57
REG	R&E018	Regeneration & Environment staffing efficiencies	No	59
CYP	CYP004	WLA Shared Fostering Service	Yes	61
CYP	CYP008	Children's centres	Yes	66
PPP	PPP001	Reducing voluntary sector grants	Yes	75
PPP	PPP003	Restructure of communications, conference & events department	No	83
CDS	RES003/ RES004	Customer services service modernisation, more digital	Yes	85
CDS	RES005	Customer services	No	92

LHRAI	RES001	Legal savings - Demand management	No	94
Council Tax	N/A	Overall Council Tax increase of 3.99%	Yes	96

Summary of 2021/22 – 2022/23 budget proposals

The table below sets out the equalities analysis for individual savings proposals for 2021/22 – 2022/23 against each service area:

Service Area	Index	Description	Full EIA conducted	Page no.
CWB	2021-23 CWB 001	Improved Reablement offer	No	104
CWB	2021-23 CWB 003	Placement Review	Yes	109
CWB	2021-23 CWB 004	Deprivation of Liberty Safeguards (DoLS) provision	No	114
CWB	2021-23 CWB 005	Community Care recommissioning	Yes	120
CWB	2021-23 CWB 006	Properties to relieve Temporary Accommodation	Yes	125
CWB	2021-23 CWB 013	New Accommodation for Independent Living (NAIL)	No	130
CYP	2021-23 CYP 001	Clawback of unused Direct Payments	Yes	132
CYP	2021-23 CYP 002	Short Break Centre	Yes	137
CYP	2021-23 CYP 003	Adjusting resources in demand led budgets	Yes	143
CYP	2021-23 CYP 004	CYP cross-service	Yes	149
CYP	2021-23 CYP 005	Increased income target for the Gordon Brown Centre	Yes	153
CYP	2021-23 CYP 006	10% saving on commissioning	Yes	159
R&E	2021-23 R&E 001	General Efficiencies across R&E	No	165
R&E	2021-23 R&E 002	Lighting Maintenance	No	170
R&E	2021-23 R&E 003	Schemes/Drainage fees	No	174

R&E	2021-23 R&E 004	Damage Cost Recovery	Yes	179
R&E	2021-23 R&E 005	Building Control Fees Review	No	184
R&E	2021-23 R&E 006	Brent Transport Services move	Yes	189
R&E	2021-23 R&E 007	Pre-app service; review basic and enhanced offer	No	193
R&E	2021-23 R&E 009	Apprenticeship levy commercial offer	Yes	199
R&E	2021-23 R&E 011	Facilities Management contract review	Yes	204
CDS	2021-23 CDS 001/2	ICT Client and Application support - Income generation	No	209
CDS	2021-23 CDS 003/5	ICT Client and Application support - Printing Costs & Oracle changes budget	No	214
CDS	2021-23 CDS 004	ICT Client and Application support - Salaries	Yes	219
CDS	2021-23 CDS 006	Merger of Housing and BCS contact centre	Yes	223
CDS	2021-23 CDS 007	Reduction in Postal Costs	Yes	229
CDS	2021-23 CDS 008	Savings from new Council Tax Support scheme	Yes	234
CDS	2021-23 CDS 009	Increased automation in Customer Services	Yes	239
CDS	2021-23 CDS 010	Replace IEG (on line benefits form)	Yes	244
CDS	2021-23 CDS 011	Staffing efficiencies in Customer Services	Yes	249
CDS	2021-23 CDS 012	Transformation - Staffing efficiencies	No	255
CE	2021-23 CE 001/2/3	Efficiency savings within Legal, HR, Audit & Investigations/Finance/ Assistant Chief Executive	No	257

2021/22 budget proposals

Community Wellbeing

CWB001 Public Health re-commissioning

Initial Equality Impact Analysis screening:

Reference:	CWB001
Service(s):	Public Health
Lead Member(s):	Cllr Hirani

Savings Proposals:	Savings to be delivered over the lifetime of a new contract following service redesign and re procurement of substance misuse

Financial and Staffing Information

2018/19	
Total budget for the service(s) £'000:	4,100
Total post numbers in the services(s) (FTE):	NA commissioned service

	2019/20	2020/21
	£'000	£'000
Proposed saving:	100	150
	FTE	FTE
Proposed staffing reduction	NA commissioned service	NA commissioned service

Proposed savings

Substance misuse services were redesigned and re-procured during 17/18 with a lead provider and a new service model being put in place from 1/4/18 resulting in savings over the life of the contract

How would this affect users of this service?

Service users were closely involved in the redesign of the service and in the evaluation of tenders. A change in lead provider has been unsettling for some users but they have been kept informed and involved and close attention paid to maintaining outcomes

Following a period of transition we expect service user experience and outcomes to be improved

Key milestones

The work to achieve these savings has been carried out

Key consultations

None required – as contract is in place to deliver savings

Key risks and mitigations

Close contract management to ensure new service model is implemented faithfully and to maintain high performance

These savings are within a ring fenced grant.

Equality impact screening

Is there potential for the proposed saving to have a disproportionate adverse impact on any of the following groups:	
	N
Disabled people	N
Particular ethnic groups	N
Men or Women (include impacts due to pregnancy/maternity)	N
People of particular sexual orientation/s	N
People who are proposing to undergo, are undergoing or have undergone a process or part of a process of gender reassignment	N
People in particular age groups	N
Groups with particular faiths/beliefs	N
Marriage / civil partnership	N

If the screening has identified a potentially disproportionate adverse impact, you will need to complete an Equality Impact Assessment.

EIA required?:	NO
EIA to be completed by:	
Deadline:	

Lead officer for this proposal:	Melanie Smith

No update to CWB001 as of 06/12/2019 – information provided by Melanie Smith, Director of Public Health.

CWB003 Cease untargeted smoking cessation

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	Savings Proposal
DEPARTMENT:	Community and Wellbeing - Public Health
TEAM:	Stop Smoking Service

LEAD OFFICER:	Janice Constance and Clementine Djatmika
DATE:	24/12/2018

SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

The proposal is to cease untargeted smoking cessation and retain the stop smoking service for mental health service users and pregnant women. Intended results is to make the service more cost-efficient.

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

In 17/18, 1143 smokers were supported to quit by public health commissioned services. Smokers who wish to quit would lose access to free nicotine replacement therapy and to face to face support.

NRT would still be available to purchase or on prescription. On line and telephone support would be available, provided by the London Smoking Cessation Transformation Project.

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

The revised service will advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it. For example those who are pregnant or those with a disability, i.e. mental health service users. Service outcome is designed to lower inequalities in smoking related outcomes in those with protected characteristics. For example those who are pregnant or those with a disability, i.e. mental health service users.

4. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age		X	
Sex		X	
Race	X		

Disability	X		
Sexual orientation		X	
Gender reassignment		X	
Religion or belief		X	
Pregnancy or maternity	X		
Marriage		X	

5. Please complete **each row** of the checklist with an “X”.

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council's public sector equality duty?	X	
Does the policy or proposal relate to an area with known inequalities?	X	
Would the policy or proposal change or remove services used by vulnerable groups of people?		X
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	X	
If you have answered YES to ANY of the above, then proceed to section B. If you have answered NO to ALL of the above, then proceed straight to section D.		

SECTION B – IMPACTS ANALYSIS

1. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

Disability: People with disabilities who may also have mental health problems especially those with drug and alcohol problems are more likely to smoke than general population and less likely to quit without support. Race: Some BME groups have higher smoking rates than average (e.g. Bangladeshi, Arab, Turkish and some Eastern Europeans). Some groups such as the South Asian population will have lower smoking rates, however have an increased rate with the use of other tobacco products such as shisha and chewing tobacco. Pregnancy and Maternity: The impact of smoking during pregnancy on maternal and foetal health is significant in terms of morbidity, mortality, long term infant health

and healthcare costs. The smoking status at time of delivery in 2016/17 was 3.2%, this equates to 146 women smoking at time of delivery (fingertips).

2. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

AGE	
Details of impacts identified	Not Applicable
DISABILITY	
Details of impacts identified	The stop smoking service will be targeted to mental health service users. This will: • Increase available support and resources to aid in smoking cessation • Service will be tailored to the needs of this vulnerable group
RACE	
Details of impacts identified	The stop smoking service will be targeted to chewing tobacco/shisha service users. This will: • Increase available support and resources to aid in smoking cessation • Service will be tailored to the needs of this targeted group
SEX	
Details of impacts identified	Not Applicable
SEXUAL ORIENTATION	

Details of impacts identified	Not Applicable
PREGANCY AND MATERNITY	
Details of impacts identified	The stop smoking service will be targeted to pregnant service users. This will: • Increase available support and resources to aid in smoking cessation • Service will be tailored to the needs of this targeted group
RELIGION OR BELIEF	
Details of impacts identified	Not Applicable
GENDER REASSIGNMENT	
Details of impacts identified	Not Applicable
MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	Not Applicable

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

None identified

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

None identified

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

None identified

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

None identified

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

- | |
|--|
| <ul style="list-style-type: none">• Continuous feedback received from the community,• Recording demand for service• Data analysis from Midwifery and mental health services and service users. |
|--|

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

As above.

SECTION D – RESULT

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

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Janice Constance and Clementine Djatmika
REVIEWING OFFICER:	John Licorish
HEAD OF SERVICE:	John Licorish

Adult Social Care re-commissioning - Homecare CWB015

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	Procurement of Homecare Services
DEPARTMENT:	Adult Social Care
TEAM:	Commissioning, Contracts & Market Management
LEAD OFFICER:	Andrew Davies
DATE:	

SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

The proposal that is the subject of the equalities analysis is a fundamental review and remodelling of homecare services for the borough. The review was required because the quality and reliability of current homecare in the borough is variable both at provider and individual service user level. There are a large number of providers in the borough and this impacts negatively on the council's ability to develop close working relationships. There is also a significant and an ongoing capacity issue within the borough related to the 'churn' and retention of the homecare workforce and reduced control over costs and expenditure. The proposed new service model will not remove services, but it will change the way services are delivered and will place greater emphasis on a personalised outcomes based approach.

The new service model is expected to deliver improved quality of service provision, improved service user experience, provide a better grip on pricing and expenditure and establish more productive working relationships with providers.

As a result the council and providers will be better able to meet both needs and the expressed preferences of service users.

Proposed changes include:

- A reduction in the overall number of homecare agencies as compared with those contracted through the WLA framework and through individual spot contracts
- A Zone/Patch based approach, which will ensure that providers have a deep knowledge of the areas they work in and are able to work closely with key partners such as GPs
- Development of a sustainable market for home care provision
- Measurable improvement in the provider's ability to deliver support in an enabling outcomes based approach
- Measurable improvement in the quality of services and consistency of care
- Measurable improvement in the service user's experience of receiving services
- Better grip on pricing and expenditure
- The council is committed to paying an hourly rate that will enable providers to pay the London Living Wage.

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

Those affected by the proposal are:

- Residents receiving, or likely to receive home care services;
- Family carers;
- Providers of home care services and their staff.

It should be noted that the nature of impact of the proposed changes is expected to be mainly positive.

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

Yes.

The very nature homecare services means that they are targeted at, and are disproportionately accessed by, vulnerable adults and children who are also more likely experience multiple disadvantage due to their age and disabilities / health conditions.

Additional disadvantages may also be experienced due to socio-economic inequalities such as fuel poverty, social isolation and economic deprivation.

4. Please indicate with an “X” the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age	X		
Sex		X	
Race	X		
Disability	X		
Sexual orientation		X	
Gender reassignment		X	
Religion or belief		X	
Pregnancy or maternity		X	
Marriage		X	

5. Please complete **each row** of the checklist with an “X”.

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council’s public sector equality duty?	X	
Does the policy or proposal relate to an area with known inequalities?	X	
Would the policy or proposal change or remove services used by vulnerable groups of people?	X	
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	X	
If you have answered YES to ANY of the above, then proceed to section B. If you have answered NO to ALL of the above, then proceed straight to section D.		

SECTION B – IMPACTS ANALYSIS

1. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

Engagement Activity

An engagement plan was created from the start of the review, which included detailed activities to specifically involve a wide range of individuals who would be affected by the proposed changes. Engagement activities included: service user telephone interviews and workshops; care provider surveys and workshops; care worker engagement surveys; and consultations with internal staff and external providers. A detailed analysis of the profile of homecare and reablement service users will be undertaken and used to monitor the different needs of service users across the borough.

Three task and finish groups, which included representatives from provider organisations, were also set up to focus on Operational Change, Workforce Development and Technology. The aim of these groups was to identify how homecare provision in Brent could be improved.

Further engagement was undertaken prior to finalising the proposed service model. This consisted of face to face and telephone interviews of service users and a workshop session with carers. The review results of the additional engagement reflected the results of earlier engagement results.

Key Finding from Engagement Activities

Consistent themes from the engagement activity and data analysis have been used to develop the service model and service specification. These include:

- Having the same carer
- Carers turning up on time
- Being able to contact the agency
- Having a carer of a specific gender and or a carer who understands service user religious or cultural needs
- Better communication between the council and the provider and between the provider and the service user
- The provider having a better knowledge of the area they work in – this will help reduce travel time and enable the provider to work closely with local partners such as GPs
- Better workforce planning, certainty around hours for care workers improving recruitment and retention
- Better training for carers employed by providers

Data Analysis

Data used in this assessment largely came from the B13 Reports and is based on the total number of homecare or reablement packages of care open on Mosaic as of the 31st September 2017. Please note that the total number of open homecare or reablement packages of care may not reflect the total number of individual service users receiving a home care or reablement service as some service users may have

more than one package of care, for instance in the case of two carers being required for a call.

Further B13 reports have been produced throughout the development of the model. The data contained within this document reflects the detailed 2017 data upon which the model was based and provides some comparisons with high level data from additional reports.

Relevant information from the data analysis is set out in individual sections of the documents.

Other Considerations

Cultural

Given the diversity of the borough, due consideration has also been given to the specific needs of service users from BAME backgrounds and faith groups, as well as the specific needs of LGBT adults.

IMD

By its very nature homecare and reablement services are targeted at, and disproportionately accessed by, vulnerable adults who are also more likely experience multiple disadvantage. The percentage of homecare and reablement service users within each ward was analysed in tandem with wider Brent indicators of deprivation including health and income. Whilst these indicators may not be protected characteristics, they helped the council understand the needs requirement of service users and any external factors influencing their circumstance.

There was only a slight positive correlation (0.337) between percentage of homecare and reablement service users (ranked by ward) and the levels of deprivation (ranked by ward), (see figure 27). Although this indicates that level of deprivation has little influence on the number homecare and reablement service users, the wards of Stonebridge, Harlesden and Willesden Green are all ranked in the top 5 most deprived wards in the borough (1, 2 & 4 respectively) and correspondingly had the same ranked position for percentage of service users per ward. As such it highlights an increased level of need within these three areas particularly due to higher levels of deprivation. This information will be taken into consideration for any final recommendations of the review.

Furthermore, as stated in the Brent Council's 2019 - 2023 Equality Strategy, there is a recognition that an individual's health has influence on their needs and life outcomes. There is a positive correlation (0.606) between self-reporting of Bad or Very Bad health in the Brent population by ward and the percentage of homecare and reablement service users (see figure 14). In only three instances (Brondesbury Park, Dollis Hill and Kilburn) there is a larger than 1% difference which suggests that wards with increased self-reporting of bad or very bad health does correspond to that

wards levels of need within homecare and reablement. This information will be taken into consideration for any final recommendations of the review.

Family Carers

Family carers may also be impacted by the proposals. Nearly 9% of Brent's residents provide some form of unpaid care, and in the decade between 2001 and 2011 there has been an overall increase in unpaid carers in Brent, with 26,600 residents providing one hour of care or more on a weekly basis, and nearly 1,600 people providing care of between 20 and 49 hours a week, and 1,312 providing care of 50 hours or more per week in the borough¹. In 2017/18 there were 5536 carers registered with Brent Carers Service, estimated to be around 20% of the total carers population in Brent. The review has aimed to include the opinions of family carers where possible.

Care Workers

Skills for Care estimate that 30% of care works in Brent are on zero hours' contracts, higher than the England average at 24% but lower than the London average of 37%. It is estimated that 57% of care workers in Brent are employed on a full time basis with 18% employed on a part time basis and 26% of care works having no fixed hours. The homecare and reablement review is taking this into consideration and looks to benefit care workers within Brent by changing interaction with providers.

The above will be reinforced by a review on the rates of pay seen in Brent. According to Skills for Care, the average hourly rate for care workers in Brent is £8.28, which is slightly lower than the London average of £8.31. However, the average hourly rate is higher in Brent than the neighbouring councils of Barnet (£8.06), Ealing (£7.90) and Harrow (£8.07). The homecare and reablement review aimed to understand if transport is incorporated into this hourly rate and to promote all providers to be paying the minimum of National Living wage with the view to work towards paying the London Living Wage.

2. For each "protected characteristic" provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state "not applicable".

AGE	
Details of impacts identified	<u>Service Users</u>
	Brent has a young population with a median age of 35, five years below the national average. 12.1% of the population are over 65. However, the population is aging, it is predicted that the number of residents aged over 65 is expected to increase by two thirds by 2028 – an additional 26,000 older residents.

¹ Brent JSNA 2014

	21% of the population are children (under 16) and this is expected fall to 19% by 2038. In comparison in 2017 and 2018 89% of homecare service users were over 65. Figure 3 shows a closer ward by ward comparison of age. Any changes made to homecare will impact the elderly population of Brent far greater than any other age bracket. The wards with an older population may be disproportionately affected compared to other areas in the borough. Consideration has been given to the distribution of homecare and reablement service users across the wards within the borough (see figure 13). Homecare and reablement service users are fairly evenly distributed across the borough, with the average percentage distribution across all wards being 4.55% when including the service users with no ward information, and being 4.72% when removing them. The highest percentage of service users are found in Stonebridge with the lowest percentage of service users residing in Queens Park. <u>Care Workers</u> The average age of care workers in Brent is reported to be 45, with 6% of care workers aged under 24, with 23% aged over 55. The age demographic of Brent's workforce is therefore in line with our neighbouring councils of Harrow (44), Barnet (45) and Ealing (44). <u>Action</u> This review has taken into account the demographic make-up in relation to the age of service users and care workers when considering the final recommendations and the development of the service model and specification. Particular focus has been placed on ensuring that factors relating to age, percentage of service users in a ward and areas of multiple deprivation have been considered when developing the Zones for lead providers across the borough. For instance, Stonebridge and Harlesden wards are ranked as the top two most deprived wards in the borough and are also the top two for percentage of service users. As a result, these wards are each in a Zone of their own, whereas other Zones contain two wards each. This means that lead providers for these wards can focus on the specifically on one area. In addition, in recognition of specialist nature of the services required by child service users and their families, the service model includes 4 specialist children's homecare providers. Two working the west of the borough and two in the east.

	The implementation will only happen following consultation with individual service users and unless the council is satisfied that the provider has the staff and infrastructure in place to meet the needs of the service user. Continued consultation with internal and external stakeholders, service users, family carers and providers will help alleviate the possibility of currently unidentified negative impacts occurring.
DISABILITY	
Details of impacts identified	More than half of all residents in Brent aged over 65 have a long term disability compared with 3% of Children and 16% of those aged between 16 & 64. 86.52% of homecare and reablement service users have 'Physical Support' as their primary service user group (see figure 19). Within 'Physical Support', 69.32% of service users receive a package of care under the Older Persons Service (OPS) (see figure 16). A ward breakdown by service types has been conducted: Learning Disability (LD), Mental Health (MH), Older Person Service (OPS), Physical Disability (PD) and reablement (see figure 21 – 26). <u>Action</u> This data has been looked at in tandem with GP localities and existing care providers within the borough to ensure service users have sufficient access to relevant care (see figures 15 – 18). This review has taken into account the information relating to disability when considering the final recommendations and the development of the service model and service specification. For instance, the model sets out the need to have specialist providers for Learning Disabilities, Mental Health and Children. Lead providers in each of the Zones in the borough will specifically focus on services for older people with physical disabilities. The specification places the person at the centre of support planning and risk assessment focussing on the outcomes they want to achieve. It aims to ensure that they have the right support at the right time to live well with their particular conditions. Providers will need to ensure that staff have received the appropriate training relating to the specialism they are working within and the specific needs of the clients they are working with. The implementation will only happen consultation with individual service users and unless the council is satisfied that the

	provider has the staff and infrastructure in place to meet the needs of the service user. Continued consultation with internal and external stakeholders, service users, family carers and providers will help alleviate the possibility of currently unidentified negative impacts occurring.
RACE	
Details of impacts identified	In 2017 32.31% of homecare and reablement service users were White, with 28.43% of service users being Asian or Asian British, and 25.1% of service users being Black or Black British. There is a higher percentage of Black or Black British homecare and reablement service users than in the wider Brent population, with individuals identifying as White, Asian or Asian British and Mixed, Multiple or Other having a lower percentage representation within service users than in the wider Brent population (see figures 4 to 9). The review took this information, and any implications it may have, into account when developing recommendations. In 2018 36% of homecare users were White while, 26% Asian or Asian British, 24% & Black or Black British. The percentage of Black or Black British service users remains higher than the wider Brent population Unfortunately, there is no data outlining the ethnicity for 11.44% homecare and reablement service users (see figures 7 & 9). Therefore, there is an unknown element for a proportion of service users that the review cannot fully take into consideration which may lead to negative implication. However, the review looks to improve the service and, in turn, improve service users' experiences. We will also look at systems, such as the use of Care Place to improve the collection of data. <u>Care Workers</u> Skills for Care analysis indicates that Brent has an estimated 61% of care workers of British nationality, 11% from within the EU and 28% outside the EU. Brent had a higher percentage of care workers of British nationality than the neighbouring councils of Barnet (42%) and Harrow (55%) respectively, with similar rates to Ealing (60%). All four councils had a greater reliance on non-EU workers than EU workers. <u>Action</u>

	This review has taken into account the demographic make-up, cultural and language needs of service users and the demographic make-up of care workers when considering the final recommendations and the development of the service model and specification. For instance, the service specification requires providers place the person at the centre of support planning responding to individual needs and desired outcomes. Providers are also required to respond to future demographic changes.
SEX	
Details of impacts identified	Although the effect of the review is presumed to be neutral on the sex of homecare and reablement service users, it is important to note that in 2017 and 2018 there is a greater percentage of female than male service users. In 2017 59.06% of service users were women, in comparison with the wider Brent population of 50.3%. (see figure 1 & 2) In 2018 58% of services users were female and 41% male. <u>Action</u> This review has taken into account the demographic make-up, of service users and the demographic make-up of care workers when considering the final recommendations and the development of the service model and specification.
SEXUAL ORIENTATION	
Details of impacts identified	Not known. There is no recorded information on the sexual orientation of homecare and reablement service users. We will also look at systems such as the use of Care Place to improve the collection of data. <u>Action</u> The service model and specification will ensure that the council and its contracted providers aim to provide LGBT-inclusive services.
PREGNANCY AND MATERNITY	
Details of impacts identified	This protected characteristic of pregnancy does is not specifically applicable to this service. <u>Action</u>

	The service model and specification will ensure that the council and its providers provide an inclusive service.
RELIGION OR BELIEF	
Details of impacts identified	Unfortunately, there is no recorded information on the religion or belief of homecare and reablement service users. <u>Action</u> The service specification will ensure that the council and its contracted providers provide culturally and religiously sensitive services, wherever possible. For instance, the service specification requires providers to take a person centred approach will be taken to care and support planning. This will include the ability to specify the gender of those who support them and religious practices that may be taken into account when providing care. We will also look at systems such as the use of Care Place to improve the collection of data.
GENDER REASSIGNMENT	
Details of impacts identified	Not known. There is no recorded information on the gender identity of homecare and reablement service users. <u>Action</u> The service specification will ensure that the council and its contracted providers will aim to provide LGBTQ+ inclusive services. We will also look at systems such as the use of Care Place to improve the collection of data.
MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	There is no recorded information on this protected characteristic. <u>Action</u> The service specification will ensure that the council and its contracted providers will aim to provide an inclusive services

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

No

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

Participants in engagement initiatives were, as far as possible, representative of the people who will be affected by the proposals.

An engagement plan was created from the outset of the review, detailing proposed initiatives to actively involve all individuals affected. The initiatives included: service user telephone interviews and workshops; care provider surveys and workshops; care worker engagement surveys; and consultations with internal staff and external providers. A detailed analysis of the profile of homecare and reablement service users has been undertaken and used to monitor the different needs of service users across the borough.

Three task and finish groups were also set up to specifically focus on Operational Change, Workforce Development and Technology. Working with providers the aim of these groups was to identify the quality of homecare provision in Brent could be improved and person centred outcomes achieved.

A care worker survey was developed and circulated to all contracted care provider agencies in the borough. Pay, training and security were highlighted as issues.

To test that the emerging service model, further engagement was undertaken toward the end of the process. This consisted of face to face and telephone interview with service users, a workshop sessions focused of carers and further provider tenement forums.

No further engagement is required prior to the model being implemented. However, ongoing engagement will be required during the implementation period and beyond to ensure the anticipated improvement in quality is sustained and equalities implications are monitored. This will also be achieved via the performance and quality framework set out in the specification.

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

N/A

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

No further action plan required at this stage. All of the issues identified above have been address during the development of the service model and service specification.

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

The Service Specification and associated Schedules include

- A Quality Assurance Framework,
- An Outcomes Framework and
- A Performance Management Framework.

To support these, providers must use the council specified Electronic Call Monitoring (ECM) system. This will provide real time information to ensure service users receive the care they need at the correct time.

The use of CarePlace, an electronic brokerage system, will also be mandatory for providers. This will enable the council and providers to respond to new service users and changes to service user needs more quickly. It will also provide contract monitoring information and equalities monitoring information.

In addition, a team of Placement Relationship Officers will monitor the contract and the quality of service provision. They will undertake regular provider audits, which will include face to face discussions with service users, deal with complaints with the aim of preventing escalation and participat in safeguarding investigations.

Placement Relationship Officers will develop and deep and ongoing relationship with providers making recommendations for improvement and monitoring the implementation of those recommendations.

Ongoing service user engagement will take place during the implementation period and beyond.

A regular Brent Provider Forum will be held all providers will be invited to attend. The Provider Forum will encourage the sharing of good practice and develop an agenda that will focus on quality and improvement. This will include speakers and workshops that focus on current issues, common challenges and emerging issues including those relating to equalities.

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

Equalities issues have been taken into account throughout the review and have been a key focus in the development of the new service model and service specification.

Where identified, negative impacts have been addressed within the model and specification. Positive impacts of the proposed model have been enhanced where possible. An example of this is the focus placed on specialist providers and the way the Zones have been developed.

The main changes to the homecare service model have been set out below:

- A move away from a Brent wide, generic service to a patch based model aligned to the 13 Primary Care Networks for the delivery of service for Older People and Physical Disabilities (details of patches is set out at Appendix 1). Each patch would have a lead provider and a support provider who would be required to deliver at least 80% of all of the hours in the patch. The remaining hours would be delivered by providers from an approved provider list, allowing smaller providers who do not have the capacity to deliver the required volume of hours in any patch to also continue to deliver work for Brent and will also provide a degree of market assurance and allow us to retain enough providers to cover any market failure issues.
- For 'specialist' care groups, where there is not enough demand to allow for a split into 13 patches, we are proposing two patches. For reablement and children's services the proposal is to work on two patches covering the borough, with four lead providers for each service type. For learning disabilities and mental health services, the plan is to have two patches, with two lead providers for each service type.
- Whilst providers will be able to bid for as many services as they wish, they will only be awarded a maximum of:
 - Up to two older people / physical disability zones
 - One older people / physical disability zone and one of the children's, reablement, LD and MH or dementia zones
 - Providers will only be the lead provider for one of the children's, reablement, LD and MH zones – they will not be awarded two of these zones.
- This model has the benefit of allowing providers to develop relationships with a smaller group of GP practices, less travel time and security around the number of hours to be delivered allowing for longer term workforce planning for providers. This should also result in a smaller number of providers, allowing for better contract monitoring and better training and support for carers.
- Consistency of care worker is something that the council and care providers are committed to, and it will be included as an element in performance and contract monitoring schedules. As part of the re-procurement provider will be asked to commit to providing a small pool of named care workers for each service users, and commit to these named workers being the people who deliver care to the service user for the lifespan of the contract (wherever possible).
- The council has committed to paying an hourly rate that allows workers to be paid at London Living Wage levels.

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

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date
Quality and contract monitoring visits will consider equalities issues	Quality and performance measures are being achieved	Andrew Davies	Ongoing
Aggregated quality monitoring information will be monitored by the HOS and SGAB	Quality and equality issues and identified quickly and action taken	Andrew Davies	Ongoing
Equalities Data will be monitored on a regular basis	Issues are identified and action taken	Andrew Davies	ongoing

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	
REVIEWING OFFICER:	
HEAD OF SERVICE:	

Adult Social Care re-commissioning – Placement Review CWB016

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	Placement Review

DEPARTMENT:	Adult Social Care
TEAM:	Residential and Nursing Team
LEAD OFFICER:	Andrew Davies, Head of Commissioning, ASC
DATE:	5 th December 2019

SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

There are currently c. 180 residential or nursing care placements that cost the council over £1,000 per week.

Placements are to be reviewed as part of the NAIL programme, to determine whether people could be moved to less restrictive placements, or whether there is any scope for fee reduction based on need and care provided.

For some service users, they will be supported to move into new placements, better suited to their needs, but that also deliver a financial saving to the council; other placements will be subject to fee negotiation, if the client is unable to move, but where it is felt a fairer price for the service can be negotiated.

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

Adult Social Care service users living in residential or nursing placements, or high cost supported living placements.

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

Yes. All of the people affected by this proposal have a disability, which will need to be taken into account when considering the impact of moving someone to another service. People will not be moved if it is felt that it is not going to be in their best interests or would have a detrimental impact on them because of their disability. The primary aim of moving someone from one placement to another is to move them to a service that better meets their needs that have arisen because of their disability.

4. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age		X	
Sex		X	
Race		x	
Disability	X		
Sexual orientation		X	
Gender reassignment		X	
Religion or belief		X	
Pregnancy or maternity		X	
Marriage		x	

5. Please complete **each row** of the checklist with an “X”.

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council's public sector equality duty?	x	
Does the policy or proposal relate to an area with known inequalities?	x	
Would the policy or proposal change or remove services used by vulnerable groups of people?		x
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	x	
If you have answered YES to ANY of the above, then proceed to section B. If you have answered NO to ALL of the above, then proceed straight to section D.		

SECTION B – IMPACTS ANALYSIS

6. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

ASC keeps up to date records of all placements in residential, nursing and supported living services, the cost of those placements and the primary disability for the person in those services. This has enabled us to identify the high cost placements to focus our review work on, as well as those placements to target for price negotiation where it has been identified that it would not be in the individual best interests to move placement.

7. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

AGE	
Details of impacts identified	None
DISABILITY	
Details of impacts identified	The proposal will have an impact on disability, in so much that all of the people affected by the proposal are living in a residential or nursing care setting because of their disability. By looking at different options for care in less restrictive settings, the proposal will give people more choice and control over how they receive their care and support and should help to promote independence for those who are able to live in less restrictive settings. Nobody will be moved to another care setting without a review, which will assess their care needs and match those to service best able to meet those needs. If a person cannot be moved, the council will seek to re-negotiate the cost of their existing placement so it better reflects assessed care needs.
RACE	
Details of impacts identified	None
SEX	
Details of impacts identified	None
SEXUAL ORIENTATION	
Details of impacts identified	None

PREGANCY AND MATERNITY	
Details of impacts identified	None
RELIGION OR BELIEF	
Details of impacts identified	None
GENDER REASSIGNMENT	
Details of impacts identified	None
MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	None

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

No

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

Engagement is done on an individual basis with service users, their families and friends and advocates, rather than wider consultation with all people in services.

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

None.

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

N/A

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

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

SECTION D – RESULT

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

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Andrew Davies, Head of Commissioning
REVIEWING OFFICER:	
HEAD OF SERVICE:	Andrew Davies, Head of Commissioning

Adult Social Care re-commissioning – Day Care CWB017

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	Community Care Recommissioning
DEPARTMENT:	Adult Social Care
TEAM:	Community and Prevention Team
LEAD OFFICER:	Andrew Davies, Head of Commissioning, ASC
DATE:	5 th December 2019

SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

Adult Social Care plans to recommission external day care provision, restructuring provision into a new, lower cost model of care and include Public Health outcomes into a new model of delivery.

Day care in Brent is commissioned according to an old fashioned and out of date model. The majority of provision is expensive, building based and does not offer choice and control to service users. Additionally, there is an over provision of traditional day care in Brent, meaning that providers are not transforming their services, and often wish to increase their costs for the Council to make up for low take up of their services.

The commissioning service are working with providers to redesign services into new models of care that supports more choice and control and promotes less building based provision. Public Health outcomes will also be built into the recommissioned service.

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

Adult Social Care service users that attend day centres, as well as future service users.

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

Yes. The majority of people (but not all) who attend day services have a disability, which will need to be taken into account when considering the impact of re-commissioning services. The two main groups of service users are older people and people with a learning disability.

4. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age	X		
Sex		X	
Race		x	
Disability	X		
Sexual orientation		X	
Gender reassignment		X	
Religion or belief		X	
Pregnancy or maternity		X	
Marriage		x	

5. Please complete **each row** of the checklist with an “X”.

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council’s public sector equality duty?	x	
Does the policy or proposal relate to an area with known inequalities?	x	
Would the policy or proposal change or remove services used by vulnerable groups of people?	x	
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	x	
If you have answered YES to ANY of the above, then proceed to section B. If you have answered NO to ALL of the above, then proceed straight to section D.		

SECTION B – IMPACTS ANALYSIS

1. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

We have a significant amount of data to inform this work, but it is still being analysed to inform commissioning options. We are looking numbers of service users using day care services, where they live and travel to day care, the disability of individuals and whether they need transport to attend services. Ethnicity of service users is also being analysed, to inform decisions around cultural sensitive in commissioning services, and whether we should continue to commission culturally specific services.

6. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

AGE	
Details of impacts identified	Older people will continue to be significant users of day services, but the plan will be to broaden the offer to them so that services are better tailored to need. Options are still to be developed, but options for older people will continue to be central to the ASC offer.

DISABILITY	
Details of impacts identified	ASC commissions day services for people with disabilities, and this project is designed to commission services that meet the needs of people in the service now, but also identifying and commissioning services for future service users. There will be changes to services, but people with disabilities will be consulted and involved in the co-design of services, so that they have an input into design and commissioning.
RACE	
Details of impacts identified	None
SEX	
Details of impacts identified	None
SEXUAL ORIENTATION	
Details of impacts identified	None
PREGANCY AND MATERNITY	
Details of impacts identified	None
RELIGION OR BELIEF	
Details of impacts identified	None
GENDER REASSIGNMENT	

Details of impacts identified	None
MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	None

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

No

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

Engagement is done on an individual basis with service users, their families and friends and advocates. Further engagement will also be undertaken as proposals are developed – they will need to be consulted on.

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

None.

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

N/A

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

Ongoing consultation and engagement with service users, families and staff.

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired

outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

We do not anticipate any negative impacts on equalities considerations as a result of this project. Inevitably with change, particularly where it involves longstanding standing services that haven't changed in many years, people will not necessarily be supportive. Much of the work with this project will be focussed on service user engagement so that people input into the changes and are well informed before they take place. But, there is no plan to change the proposal because of equalities considerations.

SECTION D – RESULT

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

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Andrew Davies, Head of Commissioning
REVIEWING OFFICER:	
HEAD OF SERVICE:	Andrew Davies, Head of Commissioning

Adult Social Care re-commissioning - Prevention Contracts CWB018

Reference:	CWB018
Service(s):	Prevention Contracts
Lead Member(s):	Cllr Farah, Cllr Hirani

Savings Proposals:	Non statutory ASC services will be specified with public health to include a stronger focus on prevention and health promotion.

Financial and Staffing Information

2018/19	
Total budget for the service(s) £'000:	200
Total post numbers in the services(s) (FTE):	0

	2019/20	2020/21
	£'000	£'000
Proposed saving:	200	0
	FTE	FTE
Proposed staffing reduction	0	0

Proposed savings

A number of contracts have been identified that have the potential to contribute to public health outcomes through support for preventative services. These services will be re-specified and recommissioned through the PH grant.

How would this affect users of this service?

The services will be recommissioned to deliver broader outcomes, ASC required outcomes and public health outcomes, so the impact on service users should be positive. This is a

re-commissioning proposal with an administrative change in budgets and so if there is an impact in services it will be positive.

Key milestones

1. Identify services which could be re-specified and recommissioned to increase their public health impact.
2. Agree Public Health funding suitability with DPH and Finance
3. Re-specify and undertake procurement.
4. Finance to amend budget coding.

Key consultations

None required.

Key risks and mitigations

There is a risk that changes to the use of PH grants will mean the identified contracts cannot be funded. Risk will be mitigated by ensuring that only preventative and PH contracts are identified.

Equality impact screening

Is there potential for the proposed saving to have a disproportionate adverse impact on any of the following groups:	
Disabled people	N
Particular ethnic groups	N
Men or Women (include impacts due to pregnancy/maternity)	N
People of particular sexual orientation/s	N
People who are proposing to undergo, are undergoing or have undergone a process or part of a process of gender reassignment	N
People in particular age groups	N
Groups with particular faiths/beliefs	N
Marriage / civil partnership	N

If the screening has identified a potentially disproportionate adverse impact, you will need to complete an Equality Impact Assessment.

EIA required?:	No
EIA to be completed by:	
Deadline:	

Lead officer for this proposal:	Helen Woodland

CWB021 Housing Association Lease Scheme Proposed to introduce a Reasonable Rents policy

EQUALITY ANALYSIS (EA)

Proposal 1 - Reasonable Rents

POLICY/PROPOSAL:	Brent Equality Analysis - Introduce a new nominations agreement with Registered Providers
DEPARTMENT:	Community Wellbeing
TEAM:	Housing Needs
LEAD OFFICER:	Omari Gayle
DATE:	24/04/2019

SECTION A – INITIAL SCREENING

2. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

The Council is working to increase housing supply. This proposal is to offer newly accepted homeless households' accommodation with Assured Shorthold Tenancies (AST) from a Registered Provider (RP) / Registered Social Landlord under the Council's revised allocations scheme (if approved by Cabinet) to end the main homelessness duty.

The Council will work with RPs to nominate homeless families to accommodation with ASTs that the RP will lease from private owners by offering a competitive 'Reasonable Rent'.

This is not currently possible if the accommodation is classified as TA or for homelessness prevention (where Housing Benefit will only cover 90% of the January 2011 LHA rate). It is also not possible for Private Rented Sector Offers (PRSOs) into RP leased accommodation (where HB and Universal Credit (UC) will only pay 100% of the current LHA rate).

However, if an offer of an AST from a Registered Provider / Registered Social Landlord pursuant to Part 6 of the Housing Act 1996 is made in order to end the main homelessness duty or the relief duty, then a Reasonable Rent charged by an RP can be charged and fully reclaimed from HB or UC.

Accommodating households through a Part 6 offer would reduce the number of households living in TA. It should be added that such an offer of accommodation under Part 6 of the Housing Act 1996 must be suitable and affordable for the housing applicant in order to discharge the Council's duty to provide temporary accommodation to accepted homeless households.

In practice, this proposal will be implemented for newly accepted homeless households. Officers have considered the content of the Council's Tenancy Strategy,

which currently recommends to registered providers of social housing grant that the norm for a fixed term tenancy should be five years but with shorter and/or longer periods where appropriate. The council's tenancy strategy is being reviewed and changes thereto will go out for consultation and then submitted to Cabinet for a decision.

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

This proposal may affect homeless households who the council accepts the main homelessness duty to, under homelessness legislation. This means the Council has a statutory duty to secure these households suitable accommodation.

In the past three years, the council has accepted the main homelessness duty to 1,848 households from 01 April 2015 to 31 March 2018. This is an average of approximately 600 per year.

However, since April 2018 the average number of households that the Council has accepted the main homelessness duty to has reduced to an average of 30 households per month or approximately 400 per year, significantly less than previous years due to changes introduced through the Homelessness Reduction Act 2017, which introduced a statutory duty to prevent and relieve homelessness.

4. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

Yes, there is relevance to equality and the council's public sector equality duty as within the cohort of people accessing this service some protected groups are over-represented compared to the borough as a whole.

This is due to the criteria through which priority need is established under the relevant legislation: for example, a household may be regarded as being in priority need owing to age, to a physical disability or mental health condition or to pregnancy. It is also an effect of poverty and disadvantage: some ethnic groups, for example Black Africans, are over-represented among homeless households. Black Africans make up 21% of current accepted homeless households compared to 7.9% in the wider borough. (Source: 2016 population from GLA)

5. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative

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

6. Please complete **each row** of the checklist with an “X”.

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council’s public sector equality duty?	X	
Does the policy or proposal relate to an area with known inequalities?	X	
Would the policy or proposal change or remove services used by vulnerable groups of people?	X	
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	X	
If you have answered YES to ANY of the above, then proceed to section B. If you have answered NO to ALL of the above, then proceed straight to section D.		

SECTION B – IMPACTS ANALYSIS

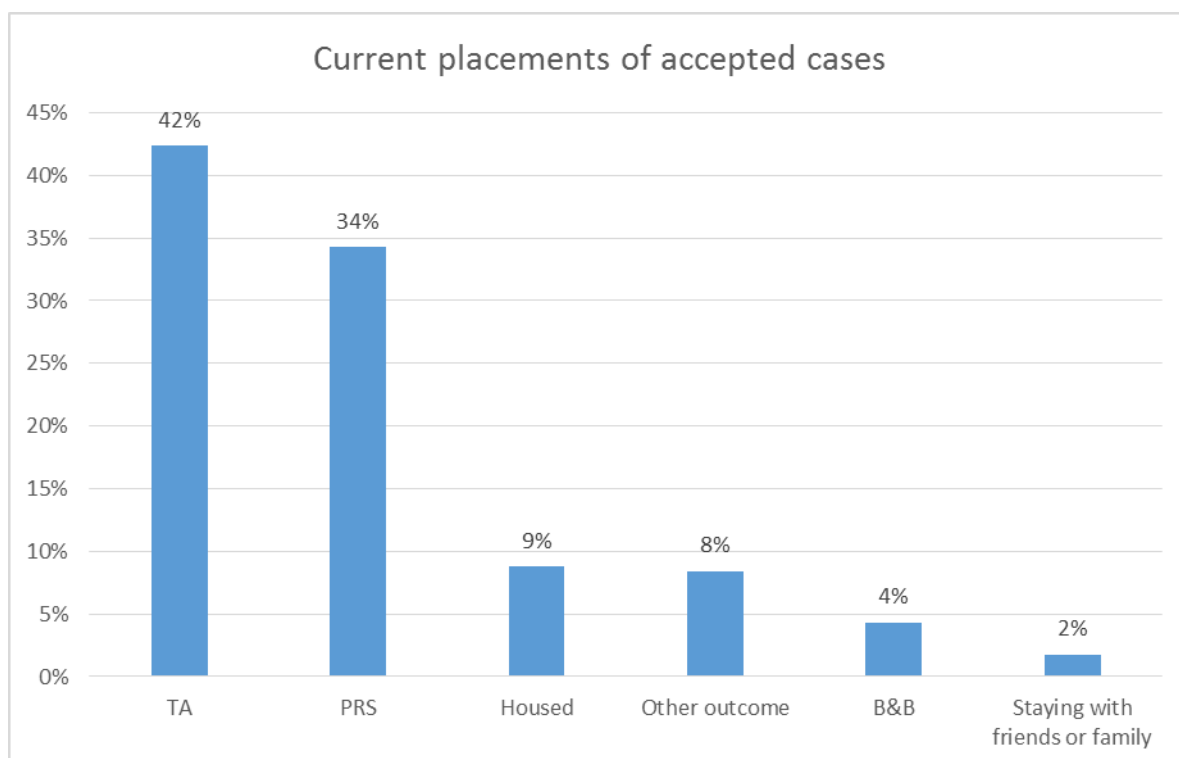
12. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

To evaluate the impact of this proposal, we have analysed the 1,848 homeless households where the main homelessness duty has been accepted for the previous

three financial years (April 2015 – March 2018) and assessed their current placements based on their protected characteristics.

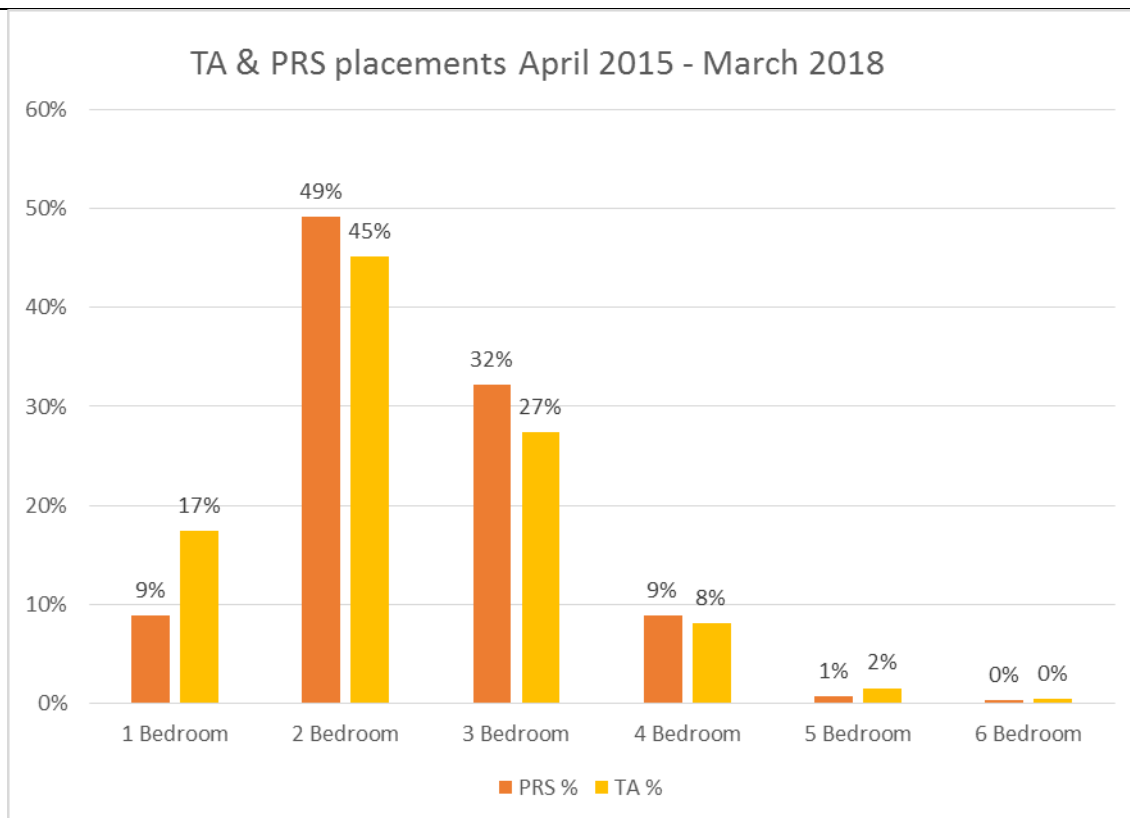
According to the data over the last 3 years:

- 42% (783) of homeless households are placed in to TA
- 34% (633) have been placed into the Private Rented Sector (PRS).
- 4% (80) applicants are in emergency bed & breakfast accommodation (B&B)
- 9% (163) have been housed in social housing
- 8% (156) of applicants have had other outcomes i.e. cases discharged or withdrawn.
- 2% (33) of applicants have made other arrangements for TA, potentially staying with family and friends



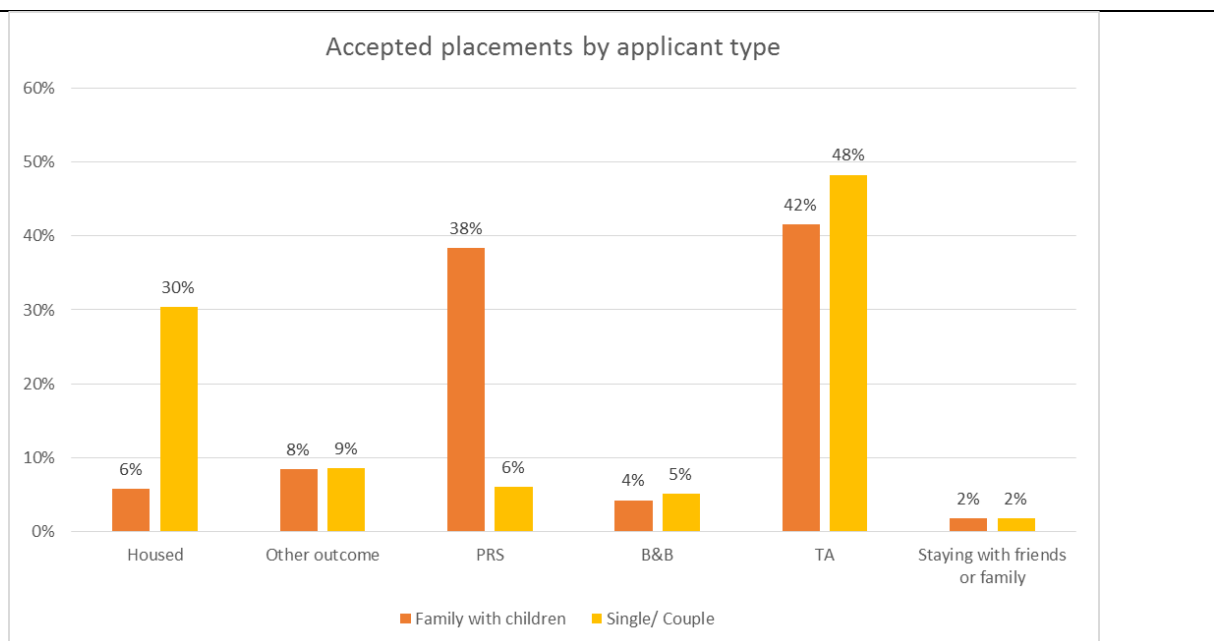
Cases with other outcomes, staying with family or friends, in B&B or housed will be excluded from the analysis, as the reasonable rents model will not affect these outcomes. The 9% of cases that have been housed have had higher bandings due to medical or other reasons.

76% (1,416) of accepted cases are placed into TA or PRS. The below data shows the different outcomes for this cohort by bedroom need which is proportionately similar for both Stage 2 TA and PRS placements after acceptance.



The biggest difference in the placements by bedroom sizes is for 1 bedrooms, which makes up 17% of the TA placements but only 9% of the PRS placements. This is because council stock is more adequately able to meet the demand for 1 bedroom households with an average waiting time of 3 years compared to 9 years for a 2 bedroom property or over 20 years for properties 5 bedroom or larger. Therefore, the focus for PRS procurement is on larger properties to meet the demand.

The below graph shows placements for single households compared to families.



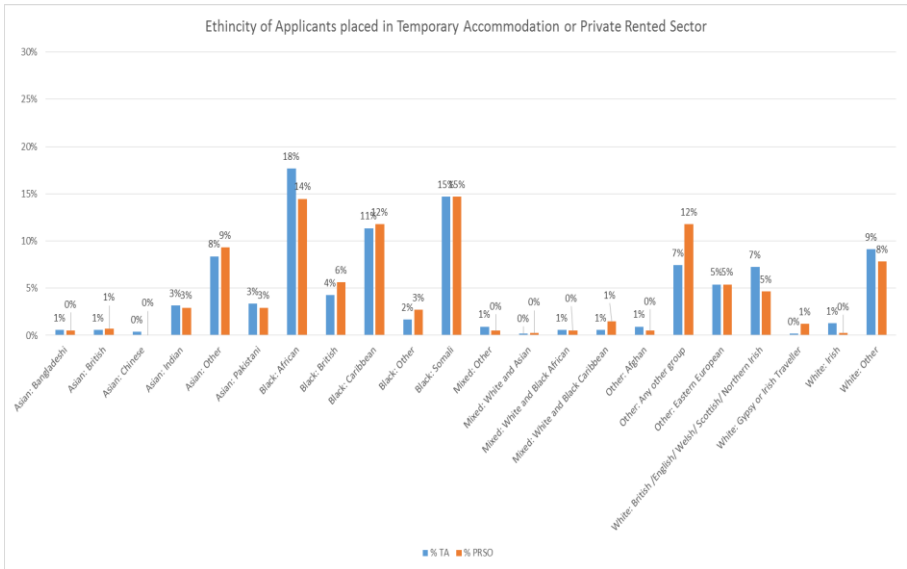
100% of single households have a 1 bedroom housing need. For this cohort the proportion of PRS placements is much lower at 6% of the overall outcomes for single households in the last 3 years.

For the equality impact modelling we will focus on the TA and PRS placements as it is these placements that will be impacted by the introduction of the reasonable rents model.

13. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

AGE	
Details of impacts identified	The below graph shows the proportion of placements by age band. We do see that placement in TA are proportionately higher for those in the age bands of 65 -70 and 70+. This age band makes up 4.7% of the entire cohort of accepted homeless households. We can also see that this age group tends to be single applicants (57%) and / or requiring smaller bedroom sizes 60% require a 1 bed property, 30% a 2 bed and 10% a 3 bed property. The older households on the waiting list are more likely to have a housing need due to disability or health concern, which is being met by suitable accommodation in the TA stock.

	It is not anticipated that the introduction of the reasonable rents model will change this distribution based on age as properties are allocated on a needs basis. Main Applicant IndicatorApplication type Count of Application Reference No Age of applicants placed in Teporary Accomodation or Private rented sector <table><tr><th>Age Range</th><th>PRS (%)</th><th>TA (%)</th></tr><tr><td>18-25</td><td>7%</td><td>5%</td></tr><tr><td>25-30</td><td>13%</td><td>12%</td></tr><tr><td>30-35</td><td>16%</td><td>16%</td></tr><tr><td>35-40</td><td>15%</td><td>16%</td></tr><tr><td>40-45</td><td>19%</td><td>15%</td></tr><tr><td>45-50</td><td>13%</td><td>13%</td></tr><tr><td>50-55</td><td>9%</td><td>10%</td></tr><tr><td>55-60</td><td>4%</td><td>5%</td></tr><tr><td>60-65</td><td>2%</td><td>2%</td></tr><tr><td>65-70</td><td>1%</td><td>3%</td></tr><tr><td>70+</td><td>1%</td><td>4%</td></tr></table> Placement Age Range	Age Range	PRS (%)	TA (%)	18-25	7%	5%	25-30	13%	12%	30-35	16%	16%	35-40	15%	16%	40-45	19%	15%	45-50	13%	13%	50-55	9%	10%	55-60	4%	5%	60-65	2%	2%	65-70	1%	3%	70+	1%	4%
Age Range	PRS (%)	TA (%)																																			
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60-65	2%	2%																																			
65-70	1%	3%																																			
70+	1%	4%																																			
DISABILITY																																					
Details of impacts identified	Through data matching with housing benefit data we can see that 143 (8%) accepted homeless households are currently receiving some form of disability allowance. Of the households identified as receiving a disability allowance, the proportion of placement is 97% into TA while 4 (3%) households were placed in PRS. The other way we can identify disability in our data is through the acceptance decision reason which could be for the below vulnerability reasons: • ELDERLY • VULNERABLE ALCOHOL ABUSE • VULNERABLE INCAPABLE OF FINDING OWN ACCM • VULNERABLE MEDICAL • VULNERABLE MENTAL ABUSE • VULNERABLE OTHER • VULNERABLE PROBATION OFFICER RECOM. • VULNERABLE SOC.SERVICES RECOMMENDATION																																				

	• VULNERABLE VIOLENCE/PHYSICAL ABUSE • VULNERABLE:FLEEING HOME IN VIOLENCE/THRE • VULNERABLE:HAVING BEEN IN CUSTODY/ON REM 143 (13%) accepted households have been identified as vulnerable in their acceptance decision. Of this cohort 126 (88%) were placed in TA while 17 (12%) had PRS placements. Through both data sets, we see a higher proportion of households with disability or vulnerability indicators placed in TA. Officers acknowledge that this is can be because of the limitations in procuring accommodation in the private rented sector that can meet the needs of the vulnerable or be managed by those who are vulnerable. We can only end homelessness duty with an offer of suitable accommodation and this may mean that social housing is the only option for some households and they will continue to be placed in TA while waiting for an offer.																																																																					
RACE																																																																						
Details of impacts identified	The below graph shows placements for accepted households in the last three years by ethnicity.  <table><caption>Ethnicity of Applicants placed in Temporary Accommodation or Private Rented Sector</caption><tr><th>Ethnicity</th><th>% TA</th><th>% PRS</th></tr><tr><td>Asian Bangladeshi</td><td>1%</td><td>0%</td></tr><tr><td>Asian British</td><td>1%</td><td>1%</td></tr><tr><td>Asian Chinese</td><td>0%</td><td>0%</td></tr><tr><td>Asian Indian</td><td>3%</td><td>3%</td></tr><tr><td>Asian Other</td><td>8%</td><td>9%</td></tr><tr><td>Asian Pakistani</td><td>3%</td><td>3%</td></tr><tr><td>Black African</td><td>18%</td><td>14%</td></tr><tr><td>Black British</td><td>4%</td><td>6%</td></tr><tr><td>Black Caribbean</td><td>11%</td><td>12%</td></tr><tr><td>Black Other</td><td>2%</td><td>3%</td></tr><tr><td>Black Somali</td><td>15%</td><td>15%</td></tr><tr><td>Mixed Other</td><td>1%</td><td>0%</td></tr><tr><td>Mixed White and Asian</td><td>0%</td><td>0%</td></tr><tr><td>Mixed White and Black African</td><td>1%</td><td>0%</td></tr><tr><td>Mixed White and Black Caribbean</td><td>1%</td><td>1%</td></tr><tr><td>Other Afghan</td><td>1%</td><td>0%</td></tr><tr><td>Other Any other group</td><td>7%</td><td>12%</td></tr><tr><td>Other Eastern European</td><td>5%</td><td>5%</td></tr><tr><td>Other Scottish/Northern Irish</td><td>7%</td><td>5%</td></tr><tr><td>White Gypsy or Irish Traveller</td><td>0%</td><td>1%</td></tr><tr><td>White Irish</td><td>1%</td><td>0%</td></tr><tr><td>White Other</td><td>9%</td><td>8%</td></tr></table> The graph shows proportionaltely similar distribution for TA and PRS placements among those ethnic groups being accepted on the housing waiting list. Therefore officers expect a neutral impact with the indrooduction of the reasonable rents model.	Ethnicity	% TA	% PRS	Asian Bangladeshi	1%	0%	Asian British	1%	1%	Asian Chinese	0%	0%	Asian Indian	3%	3%	Asian Other	8%	9%	Asian Pakistani	3%	3%	Black African	18%	14%	Black British	4%	6%	Black Caribbean	11%	12%	Black Other	2%	3%	Black Somali	15%	15%	Mixed Other	1%	0%	Mixed White and Asian	0%	0%	Mixed White and Black African	1%	0%	Mixed White and Black Caribbean	1%	1%	Other Afghan	1%	0%	Other Any other group	7%	12%	Other Eastern European	5%	5%	Other Scottish/Northern Irish	7%	5%	White Gypsy or Irish Traveller	0%	1%	White Irish	1%	0%	White Other	9%	8%
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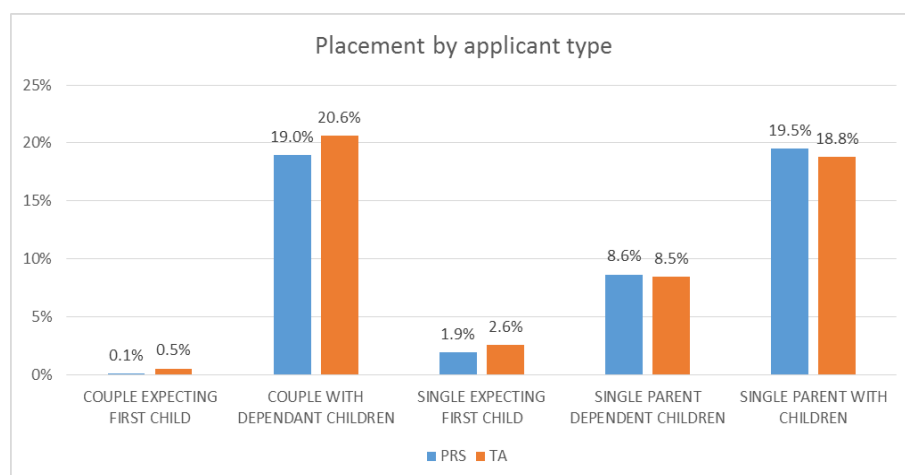
	Officers note that the ethnicity of the main applicant of the household has been used here as a proxy for the ethnicity of the household. We are mindful that using main applicant only may makes an assumption about a homogenous household makeup that may disproportionately exclude the mixed race community in our analysis. Ethnicity data is unknown for 619 (33%) applicants.									
SEX										
Details of impacts identified	The below graph shows the proportion of applicants placed in TA or PRS based on their sex. Count of Application Reference No Sex of applicants placed in Temporary Accomodation or Private Rented sector <table border="1"><thead><tr><th>Sex</th><th>PRS (%)</th><th>TA (%)</th></tr></thead><tbody><tr><td>FEMALE</td><td>69%</td><td>65%</td></tr><tr><td>MALE</td><td>31%</td><td>35%</td></tr></tbody></table> Placement: PRS (blue), TA (orange) Sex: FEMALE, MALE The proportion of placements in PRS and TA are relatively similar for both sexes. It is anticipated that the introduction of the reasonable rents model will have a nuetral impact on households based on their sex.	Sex	PRS (%)	TA (%)	FEMALE	69%	65%	MALE	31%	35%
	Sex	PRS (%)	TA (%)							
FEMALE	69%	65%								
MALE	31%	35%								
SEXUAL ORIENTATION										
Details of impacts identified	There is insufficient data regarding sexual orientation of the applicants accepted as homeless in the last three years to assess the impact on these groups. Although we do know that LGBTQI people make up between 5 and 7% of the UK population and between 4-6% of Brent's. (Source: Stonewall and GLA for population projection) We do not however, consider there to be any adverse impacts on this group.									

PREGNANCY AND MATERNITY

Details of impacts identified

There is insufficient data on pregnancy or maternity in the data set to carry out full analysis. However, there are acceptance reasons based on pregnancy.

The below graph shows placement of families accepted based on their family composition. Other acceptance reasons could include medical or vulnerability, which is not mutually exclusive.



Placements in TA or PRS and are similar for families accepted based on family composition.

We do not expect any impact on these groups with the introduction of reasonable rents.

RELIGION OR BELIEF

Details of impacts identified

There is insufficient data regarding religion of the applicants accepted as homeless in the last three years to assess the impact on these groups.

2011 Census data provides us with the following information about religion and belief in the wider borough.

Religion or belief	Percentage
Christianity	41%
Islam	19%
Hinduism	18%
No religion	11%
Judaism	1%

	Buddhism	1%
	We do not however consider there to be any adverse impacts on any religious group based on their religion or belief.	
GENDER REASSIGNMENT		
Details of impacts identified	There is insufficient data regarding gender reassignment of the applicants accepted as homeless in the last three years to assess the impact on these groups. The Diversity in Brent document states that 3,400 people in Brent experience gender variance (based on GLA population projections that equates to 1% of the borough population) Source: Stonewall. We do not however consider there to be any adverse impacts on this group based on gender variance.	
MARRIAGE & CIVIL PARTNERSHIP		
Details of impacts identified	There is insufficient data regarding marital status of the applicants accepted as homeless in the last three years to assess the impact on these groups. We do not however consider there to be any adverse impacts on this group.	

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

No, the proposal to introduce a new nominations agreement with RPs does not identify any impacts that could be unlawful under the Equality Act.

The new nominations agreement with RPs will provide a household with an offer of accommodation under Part 6 of the Housing Act 1996. This offer must be suitable and affordable for the housing applicant in order to discharge the Council's duty to provide temporary accommodation to accepted homeless households under section 193 of the Housing Act 1996.

Therefore, it advances equality of opportunity in the way that it is a fair and transparent means of allocating homes, based on the needs to the applicant.

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

Yes, a number of engagement initiatives were undertaken to gather the views of those affected by the changes to the policy as outlined below. Further engagement is not required.

Formal consultation was launched on 12 November 2018 and ended on 21 January 2019, through an on-line consultation survey. As well as advertising the consultation survey on the Council's website, and on the Locata home page, every household currently on the housing register (including Band D) was notified. Consultation workshops were also held with the following stakeholders;

- Members
- Temporary Accommodation User Forums (attended by approximately 500 households over 5 Forums)
- Registered Providers
- Voluntary Sector
- Adult Social Care
- Children's and Young People Services
- Brent Housing Management

As some of the issues that were being consulted on are fairly technical, the purpose of these workshops was to go through each issue in detail and to give people the opportunity to ask questions to clarify what we were asking them to give their opinion on. Attendees were then encouraged to express their opinions via the consultation survey that was made available via the Council's consultation portal.

An independent research company, bmg Research were also commissioned to facilitate 2 workshops on the 12 March 2019. The first workshop was made up of a group of housing professionals and the second made up of a cross section of residents of the borough. The purpose of these workshops was to give people more of an opportunity to debate the implications and express their views of the various proposals and possible impact on households seeking social housing.

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

Data on applicants and households in regards to their protected characteristics, particularly in areas where limited data prevents us drawing any conclusions (as listed below) would help improve our equality analysis.

- Disability
- Sexual orientation
- Gender reassignment
- Religion or belief
- Pregnancy or maternity

- Marriage

The introduction of a new customer portal from April 2018 where homeless applicants can make an application directly and include their demographic information will help to improve data capture in this area.

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

No negative impacts have been identified based on protected characteristics.

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

All allocations of properties made under this proposal will be monitored in line with the Council's Allocation Scheme and statutory reporting requirements to relevant agencies. Operational meetings.

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

Analysis of placements carried out in the last three years shows that different housing products can be more appropriate for different groups based on needs and availability. The emphasis of the allocations scheme is to ensure suitable accommodation is offered to those households that are in priority need based on clear and equitable guidelines.

The reasonable rents model introduces another option for households to access suitable accommodation, however for those households in need through disability or medical reasons access will remain the same to social housing either directly or through TA.

SECTION D – RESULT

Please select one of the following options. Mark with an "X".

A	CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED	X

B	JUSTIFY AND CONTINUE THE POLICY/PROPOSAL	
C	CHANGE / ADJUST THE POLICY/PROPOSAL	
D	STOP OR ABANDON THE POLICY/PROPOSAL	

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Omari Gayle
REVIEWING OFFICER:	Lavdrim Krashi
HEAD OF SERVICE:	Laurence Coaker

R&E001 Dimming Street lights

Reference:	R&E001
Service(s):	Environmental Improvement
Lead Member(s):	Cllr Sheth

Savings Proposals:	Further Street Lighting Efficiencies

Financial and Staffing Information

2017/18	
Total budget for the service(s) £'000:	£250k
Total post numbers in the services(s) (FTE):	N/A

	2019/20	2020/21
	£'000	£'000
Budget implications:		£100k
	FTE	FTE
Proposed staffing reduction	N/A	N/A

Budget Implications

An additional £0.1m p.a. could be saved through a further rigorous review of lighting levels at a highly localised level across the borough.

How would this affect users of this service?

Some users may notice lower lighting levels than expected at certain locations, especially given that previous reductions have been made. Any impact must not be sufficient to affect lighting levels required for road safety, or to meet expectations of community safety.

Key milestones

Complete review and implement detailed Lighting Plan – 2019

Key consultations

N/A. Resident and visitor feedback on lighting levels could be acted on quickly.

Key risks and mitigations

Some users will likely notice lower lighting levels than expected at certain locations. Should the lighting level not be acceptable at a specific location the CMS does allow corrective adjustments to be made rapidly.

Equality impact screening

Is there potential for the proposed saving to have a disproportionate adverse impact on any of the following groups:	
	No
Disabled people	
Particular ethnic groups	
Men or Women (include impacts due to pregnancy/maternity)	
People of particular sexual orientation/s	
People who are proposing to undergo, are undergoing or have undergone a process or part of a process of gender reassignment	
People in particular age groups	
Groups with particular faiths/beliefs	
Marriage / civil partnership	

If the screening has identified a potentially disproportionate adverse impact, you will need to complete an Equality Impact Assessment.

EIA required?:	No
EIA to be completed by:	
Deadline:	
Lead officer for this proposal:	Chris Whyte

R&E004 Building control

Reference:	R&E004
Service(s):	Regeneration – Building Control
Lead Member(s):	Cllr Tatler

Savings Proposals:	Brent Building Control continues to show a good track record in competitively winning major projects through partnership schemes. Unless there is a major economic downturn we expect to improve our income position by focussing on discretionary services. A flexible ‘associates’ resourcing model is being implemented to allow the service to operate effectively on projects across the London and south east region. The proposed savings comprise fees earned due to increase in volume of work and providing additional services through associates.

Financial and Staffing Information

2018/19	
Total budget for the service(s) £'000:	(413)
Total post numbers in the services(s) (FTE):	16.8

	2019/20	2020/21
	£'000	£'000
Proposed saving:	176	35
	FTE	FTE
Proposed staffing reduction	0	0

Proposed savings

The generation of additional income by the Building Control team. £100k is adjusting the budget to match current workload, with the remainder to come from out-of-borough associate work.

How would this affect users of this service?

No significant impact expected.

Key milestones

In implementation

Key consultations

None

Key risks and mitigations

Down turn in the economy - keep close monitor / develop further partnerships
Unexpected government policies affecting Building Control resulting from Grenfell

Equality impact screening

Is there potential for the proposed saving to have a disproportionate adverse impact on any of the following groups:	
	None
Disabled people	
Particular ethnic groups	
Men or Women (include impacts due to pregnancy/maternity)	
People of particular sexual orientation/s	
People who are proposing to undergo, are undergoing or have undergone a process or part of a process of gender reassignment	
People in particular age groups	
Groups with particular faiths/beliefs	
Marriage / civil partnership	

If the screening has identified a potentially disproportionate adverse impact, you will need to complete an Equality Impact Assessment.

EIA required?:	No
EIA to be completed by:	
Deadline:	

Lead officer for this proposal:	Aktar Choudhury

R&E008 Wembley licensing

Reference:	R&E008

Service(s):	Regeneration - Licensing
Lead Member(s):	Cllr Miller

Savings Proposals:	A potential increase in revenue arising from increased activity in Wembley. Improvement works on Olympic Way should be largely complete by 2020. The improvements should result in an increase in the number of events at Wembley and with it an increase in the workload for the Licensing service.

Financial and Staffing Information

2018/19	
Total budget for the service(s) £'000:	(154)
Total post numbers in the services(s) (FTE):	7

	2019/20	2020/21
	£'000	£'000
Proposed saving:		50
	FTE	FTE
Proposed staffing reduction		

Proposed savings

Income from additional licensing arising from increased activity in Wembley after 2020. The additional income cannot be generated until Olympic Way works are complete.

How would this affect users of this service?

No impact

Key milestones

Completion of Olympic Way

Key consultations

None

Key risks and mitigations

Delay in completing Olympic Way - Work closely with Quintain to ensure works progress to plan.

Equality impact screening

Is there potential for the proposed saving to have a disproportionate adverse impact on any of the following groups:	
	None
Disabled people	
Particular ethnic groups	
Men or Women (include impacts due to pregnancy/maternity)	
People of particular sexual orientation/s	
People who are proposing to undergo, are undergoing or have undergone a process or part of a process of gender reassignment	
People in particular age groups	
Groups with particular faiths/beliefs	
Marriage / civil partnership	

If the screening has identified a potentially disproportionate adverse impact, you will need to complete an Equality Impact Assessment.

EIA required?:	None
EIA to be completed by:	
Deadline:	

Lead officer for this proposal:	Alice Lester

R&E018 Regeneration & Environment staffing efficiencies

Reference:	R&E018
Service(s):	Environmental Services
Lead Member(s):	Cllrs Sheth, Miller and Tatler

Savings Proposals:	Staffing and Structures – Removal of circa 40 FTE – VR Offer and Compulsory.

Financial and Staffing Information

2017/18	
Total budget for the service(s) £'000:	£4m
Total post numbers in the services(s) (FTE):	N/A

	2019/20	2020/21
	£'000	£'000
Budget implications:	£1,524K	450

	FTE	FTE
Proposed staffing reduction	N/A	N/A

Budget Implications

An annual £1,974k saving of staff salary costs. Some offset may be due with respect to redundancy, severance and the cost of service redesign and possible re-evaluation of other posts. There is potential for savings to be brought into this financial year, depending on vacancies that arise.

How would this affect users of this service?

This would be a 'downsizing' exercise that will make teams leaner and would require a remodelling of structures to mitigate the impact on service delivery.

Key milestones

Managing change consultations as appropriate and also vacancies held and removed throughout the year.

Key consultations

Affected staff as and when required.

Key risks and mitigations

The opportunity could be limited to voluntary redundancy applications that are agreed. Further mitigation of the impact on staff could be through holding and removing vacant posts. Initial investigation of likely interest in VR suggests no compulsory redundancies are likely to be necessary.

Equality impact screening

Is there potential for the proposed saving to have a disproportionate adverse impact on any of the following groups:	
	No
Disabled people	
Particular ethnic groups	
Men or Women (include impacts due to pregnancy/maternity)	
People of particular sexual orientation/s	
People who are proposing to undergo, are undergoing or have undergone a process or part of a process of gender reassignment	
People in particular age groups	
Groups with particular faiths/beliefs	
Marriage / civil partnership	

If the screening has identified a potentially disproportionate adverse impact, you will need to complete an Equality Impact Assessment.

EIA required?:	No

EIA to be completed by:	
Deadline:	

Lead officer for this proposal:	Chris Whyte

Children and Young People

CYP004 Develop a shared fostering service with the 3 other WLA boroughs, resulting in staffing efficiencies

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	19/20-20/21 Budget Proposals CYP008
DEPARTMENT:	Children and Young People
TEAM:	Looked After Children and Permanency Service
LEAD OFFICER:	Onder Beter
DATE:	04/01/2019

SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

Development of a joint fostering service with another local authority (namely Ealing Borough Council). This would mean joint recruitment, assessment and approval of foster carers as well as support provided to them.

The aim is to recruit and retain more in-house foster carers who could provide a stable family environment to looked after children in Brent and Ealing. The outcomes are in line with the CYPS Departmental Plan and the Borough Plan.

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

The aim is to attract both Brent and Ealing residents as well as residents residing in neighbouring boroughs into fostering. No one is considered to be affected by this change in a negative way. In fact, via joint and more effective recruitment campaigns more prospective foster carers could be reached.

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

Providing children in care with stable and caring homes and running a fostering service are amongst council's public sector duties. Hence, making these changes, it is anticipated that the council's public sector duty will be fulfilled in a more efficient way.

4. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age		x	
Sex		x	
Race		x	
Disability		x	
Sexual orientation		x	
Gender reassignment		x	
Religion or belief		x	
Pregnancy or maternity		x	
Marriage		x	

5. Please complete **each row** of the checklist with an "X".

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council's public sector equality duty?	x	
Does the policy or proposal relate to an area with known inequalities?		x
Would the policy or proposal change or remove services used by vulnerable groups of people?	x	
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	x	
If you have answered YES to ANY of the above, then proceed to section B. If you have answered NO to ALL of the above, then proceed straight to section D.		

SECTION B – IMPACTS ANALYSIS

1. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

There is a nationally acknowledged shortage of foster carers for children in care. Brent is not an exception. Whilst local authorities struggle to recruit and retain sufficient number of foster carers, private and voluntary sector offers more financially attractive packages for foster carers, which local authorities cannot afford due to budgetary constraints. This results in a competitive market. Foster carers recruited by private and voluntary sector are commissioned by local authorities, especially when they lack in-house foster placements, which is financially burdensome.

In preparation for this project, fostering data for both Brent and Ealing has been reviewed alongside with the fostering relevant strategies i.e. marketing strategy or sufficiency strategy shared.

2. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

AGE	
Details of impacts identified	We are currently struggling to place older looked after children in fostering settings due to lack of sufficiency. We will be able to reach more potential foster carers who might be able to provide placements for children of all ages.
DISABILITY	
Details of impacts identified	Reaching out more potential foster carers means that we could have a broadened profile of carers who could offer placements to children with disabilities.
RACE	
Details of impacts identified	Reaching out more potential foster carers will improve better cultural matches between children and foster carers. Having more foster carers from different ethnic backgrounds means that we could have a broadened profile of carers who could offer placements to children from various backgrounds including unaccompanied asylum seeking children.
SEX	
Details of impacts identified	We might increase the possibility of having more male carers.
SEXUAL ORIENTATION	

Details of impacts identified	We might increase the possibility of having more carers with different sexual orientations.
PREGANCY AND MATERNITY	
Details of impacts identified	Not Applicable
RELIGION OR BELIEF	
Details of impacts identified	Having a broadened profile of foster carers will increase the possibility of better matching in relation of children's and foster carers' religions or beliefs.
GENDER REASSIGNMENT	
Details of impacts identified	We might increase the possibility of reaching people who had gender reassignment.
MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	Not Applicable

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

No

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

Further work is planned to take place in 2019 with fostering services in Brent and Ealing

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

Continuous review

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

In any case, the existing services will continue.

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

Regular reviews – performance meetings and performance indicators for looked after children will be used.

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

Further lack of in-house fostering places – this risk is mitigated by making sure there will be regular performance management that puts recruitment and retention of foster carers under scrutiny.

One LA might get more benefits - the risk will be mitigated by transparent and open protocols and processes agreed and relevant levels of authorisations granted. Regular reviews of contacts, referrals, assessments, fostering panel activity as well as retention of foster carers.

SECTION D – RESULT

Please select one of the following options. Mark with an “X”.

A	CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED	x
B	JUSTIFY AND CONTINUE THE POLICY/PROPOSAL	
C	CHANGE / ADJUST THE POLICY/PROPOSAL	

D	STOP OR ABANDON THE POLICY/PROPOSAL	

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	
REVIEWING OFFICER:	
HEAD OF SERVICE:	Sue Gates

CYP008 Develop family hubs from children's centres

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	19/20-20/21 Budget Proposals CYP008
DEPARTMENT:	Children and Young People
TEAM:	Early Help
LEAD OFFICER:	Sue Gates
DATE:	12/12/18

SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary of its objectives and the intended results.

Development of Family Hubs from the existing Children's Centres by reduction of the current number of 17 Children's Centres to 8 Family Hubs. Children's Centres remit is families with children 0-5 whereas Family Hubs will bring together the focus of whole family working from 0-19 (25 for those of SEND), families currently accessing Children's Centres will still be able to access services through the Family Hubs. Children's Centres are well placed to transform into Family Hubs, they are well known, are non-stigmatising and are in a range of accessible locations and already offer a range of services delivered by Brent Council and partners. The actual sites are yet to be confirmed but the hubs will be targeted in areas of the borough with the highest usage and levels of deprivation as well as taking into consideration the size and locality of the current Children's Centre buildings.

The aims and objectives of the Family Hubs will closely align with the agreed Outcome Based Reviews that considered adolescents on the edge of care and involved in gang activity. The objectives will also be closely aligned to key public health outcomes related to children and their families in areas such as all children receiving timely ASQ reviews, childhood obesity and tooth decay.

It is anticipated that the affected families will be made aware of the changes through the centres, and formal reports that will be released after the budget consultation period. With the change / closure of any CC's, the council will also be required to carry out consultation as stated in accordance to statutory guidance from the Dfe.

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

Families living in areas near to those children's centres that will close may not be able to access those support services as easily meaning they will need to travel further, this can be more difficult for those with SEND. Families affected will be informed at all stages of developments, ensuring they are aware of their nearest Family Hub and what services they will still be able to access.

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

People in particular age groups. Families with under 5's living in areas near to those children's centres that will close may not be able to access those support services as easily.

Brent Under 5 population estimates

Data Source:

2016-based demographic projections, London ward population projections Housing-led Model, released in 2017

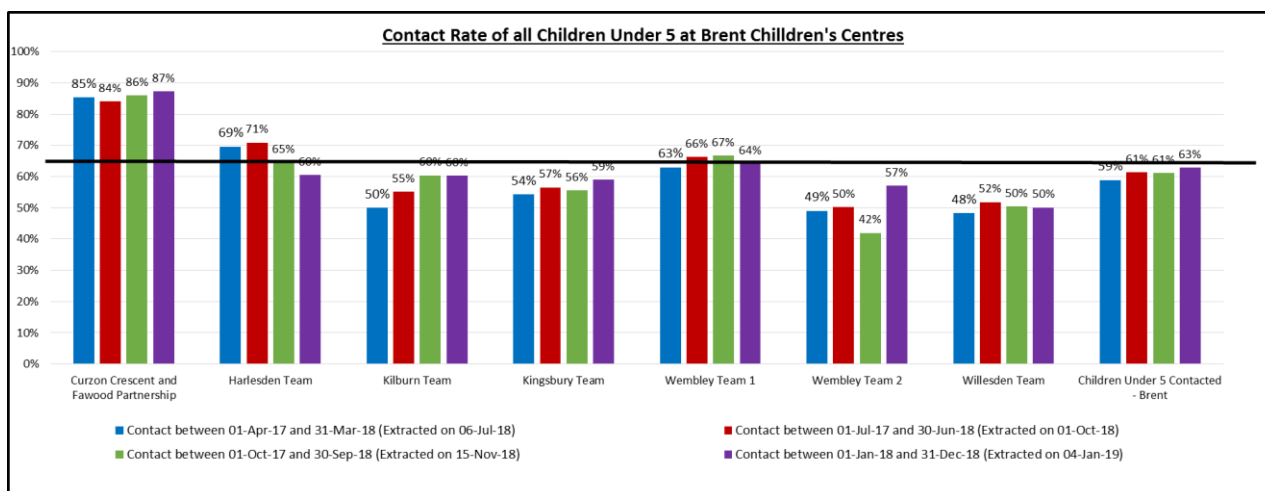
Citation: © GLA 2016-based Demographic Projections

Year / Age Group	Under 1	Age 1	Age 2	Age 3	Age 4	Total under 5 population	Difference each year
2018	5103	4970	4963	4880	4780	24696	
2019	5124	4986	4878	4864	4784	24636	-60
2020	5130	4991	4883	4777	4762	24543	-93
2021	5121	4992	4882	4773	4675	24443	-100
2022	5106	4980	4882	4770	4669	24407	-36
						Percentage decrease (from 2018 to 2022)	1.17%

NB: GLA population estimates are higher than the data provided by NHS

From this data we can see the projections of the under 5's population are expected to remain around the 24,400 region.

Based on the 2011 census, the under 5's make up 21% of Brent's population and from the 2015 JSNA it had increased by 11% taking the population of 0-5's up to 32%.



The current contact rates for the locality teams can be seen in the above chart. Our current target is to reach 65% of the registered children.

- Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age			X

Sex		x	
Race		x	
Disability		x	
Sexual orientation		x	
Gender reassignment		x	
Religion or belief		x	
Pregnancy or maternity			x
Marriage		x	

5. Please complete **each row** of the checklist with an “X”.

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council’s public sector equality duty?	x	
Does the policy or proposal relate to an area with known inequalities?		x
Would the policy or proposal change or remove services used by vulnerable groups of people?	x	
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	x	
If you have answered YES to ANY of the above, then proceed to section B. If you have answered NO to ALL of the above, then proceed straight to section D.		

SECTION B – IMPACTS ANALYSIS

1. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

Outcome Based Reviews that were carried out by the council.

The community and affected families have been given the opportunity to complete the public consultation that opened in October 2018 and will run until the end of January 2019. Four Brent Connect meetings also took place for the public to attend to find out more about the proposed changes as part of the consultation. This consultation has also been promoted to the affected families through the existing Children's Centres.

Should this budget proposal be approved, statutory Children's Centre consultation will need to take place, the council Change Team will need to be involved and consultation around Hubs will need to be carried out as part of outcome based review.

Annual impact study takes place for the Children's Centres, latest available data shows a 97% satisfaction rate for Brent CC's.

99% report positive impacts for themselves & 100% for their children from taking up support related to health & wellbeing.

2. For each "protected characteristic" provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state "not applicable".

AGE	
Details of impacts identified	Disproportionate impact on most vulnerable (CC target) families such as those requiring social care intervention (List attached) – this is mitigated by the creation of family hubs that will widen the age of support available and target the hubs in the areas of the borough with the greatest level of need. Early intervention outcomes worsen for children, such as those requiring social care intervention, health outcomes worsen – for example tooth decay continues to worsen and obesity levels continue to rise. Other poor outcomes may include children achieving below the expected level for the Early Years Foundation stage profile and children with SEND left being undiagnosed therefore unable to access intervention when needed – further impacting on their educational achievements once they reach formal school age.
DISABILITY	

Details of impacts identified	Some families with disabled members may find it harder to travel to the Family Hubs as these may be spread across the borough.
RACE	
Details of impacts identified	Not Applicable
SEX	
Details of impacts identified	Not Applicable
SEXUAL ORIENTATION	
Details of impacts identified	Not Applicable
PREGANCY AND MATERNITY	
Details of impacts identified	As integrated centres, there are services provided by the midwifery team around antenatal and postnatal support, closure of all CC's will mean that expectant / new parents will have difficulty accessing such support.
RELIGION OR BELIEF	
Details of impacts identified	Not Applicable
GENDER REASSIGNMENT	

Details of impacts identified	Not Applicable
MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	Not Applicable

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

No as Family Hubs will be intended to have a 'whole family approach' allowing children and young people from 0-19 to access services from a hub, this is further extended to 25 if they have any SEND needs. The hubs will consist of targeted intervention and also some universal services that will be open to all.

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

Public consultation of the Budget Proposals is currently open, commenced from October 2018 and will run until end of January 2019, 4 Brent Connect meetings were also made available in different parts of the borough as part of the public consultation. Feedback is currently unavailable as this consultation is still open, the council will compile a report on the findings and a decision will be made by cabinet in February 2019.

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

Continuous review – take up data within the Hub areas – is this reflective of the families within the area and the targets that are yet to be identified for the Hubs.

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

By the LA ensuring that the Family Hubs offer an integrated service that include the vital support children 0-5 and their families need. This includes services through health partners such as Health Visiting, antenatal and post-natal support and also economic support such as JCP.

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

Regular reviews - performance management cycle for the Family Hubs, (yet to be agreed) involves scrutiny on data against set targets which are also yet to be agreed, contract management with commissioned providers. Reviews are likely to take place on a quarterly basis.

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

Disproportionate impact on most vulnerable families - This risk is mitigated by the creation of family hubs that will widen the age range of support available to families who require support and target the hubs in the areas of the borough that have the highest usage and deprivation levels as well as considering the size and locality of individual centres.

Early intervention outcomes worsen for children - This risk is mitigated by ensuring the design of the new family hub model uses research findings to make best use of available resources and that these are broadened to cover school age children. This will allow greater reach of new targeted services into families than is currently possible with the existing model.

LA will need to ensure engagement with the affected community of the developments and changes with the transfer to Family Hubs from Children's Centres at all stages. Families will be informed via the existing Children's Centres, signposting to the relevant reports and having the information readily available through the Brent website.

SECTION D – RESULT

Please select one of the following options. Mark with an "X".

A	CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED	x
B	JUSTIFY AND CONTINUE THE POLICY/PROPOSAL	
C	CHANGE / ADJUST THE POLICY/PROPOSAL	

D	STOP OR ABANDON THE POLICY/PROPOSAL	

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date
Consultation with users and stakeholders	Transparency and open discussion with those affected to discuss the purpose of Family Hubs and what they may look like.	Sue Gates	October 2019
Identification and commissioning of key partnerships necessary for Family Hub services to be delivered.	Key partnerships in place with agreed SLA's prior to Family Hub launch.	Sue Gates	October 2019
Closure of CC's and transfer to Family Hub model.	Identified centres transferred to Family Hubs, bringing together a more integrated approach of working. Governance will need to be explored and agreed, this will involve key stakeholders forming a management committee. This will support with ensuring integrated working is fully developed.	Sue Gates	October 2020
Continuous engagement with the community.	Transparency and community being kept up to date with the developments.	Sue Gates	Continuous
Early intervention services continue to take place within the Family Hubs, paying particular focus to those in target groups and most in need.	Families to still be able to access a range of services to support their needs at the right time, avoiding the need to further escalation.	Sue Gates	Continuous
Performance Management Cycle to be agreed and in place for Family Hubs	Family Hubs are regularly monitored with clear targets (that are yet to be agreed) but are likely to	Sue Gates	To be agreed prior to October 2020 and

	combine educational, health and economic objectives to delivering to a high quality service with appropriate support and guidance from LA. These will be monitored against the Performance Management Cycle which will include scrutinising data.		be operational upon Family Hubs launch

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Leena Choi
REVIEWING OFFICER:	
HEAD OF SERVICE:	Sue Gates

PPP001 Reducing voluntary sector grants

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	Proposal to reduce voluntary sector funding
DEPARTMENT:	Assistant Chief Executive
TEAM:	Strategy and Partnership
LEAD OFFICER:	Julia Mlambo
DATE:	3 rd of January 2020

SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

During 2019 budget setting process, the Cabinet agreed the voluntary sector funding budget for 2019/21 and 2020/21. As part of this, the Strategy and Partnership Team made savings to its contract and commissioning programme in order to make it more efficient and sustainable in the longer term.

The proposal was to reduce the Voluntary Sector support budgets in the following ways:

- Reduce the voluntary & community sector assistance budget by £80 000 over 2 years. This budget is used to fund Brent CVS who provide capacity development support to Voluntary Sector and Community organisations (VSCOs) within the borough.
- Reduce Brent Advice Partnership Funding by £127 000 over two years. This fund is used to develop the capacity of local advice services.
- Reduce the generalist advice contract held by the Citizen's Advice Bureau (CAB) by £35 000 over two years.
- Reduce the Specialist Advice Contract by £18 000 over two years. This contract is also held by the CAB.

The first year savings were successfully implemented from April 2019 onward.

This paper is an opportunity to review the impact of the budget cuts to assess whether there are any additional effects on protected groups and therefore whether additional mitigating actions need to be taken.

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

The reductions to the voluntary & community sector assistance budget and the Brent Advice Partnership Fund are not likely to have an effect on protected groups as they do not have an impact on direct service provision.

In addition, the organisations affected are either able to access funding from other sources or did not use all their allocated funding 2018/9, so the current funding level is more in line with their apparent needs.

The budget cuts to the CAB could have a potential impact on the following groups.

- Older and disabled people could be disproportionately affected as they access CAB services in higher numbers.
- There may be some additional effects on women, some BAME groups and faith groups who are more likely to be in need of benefits and other advice. BAME groups and women access CAB services in disproportionate numbers.

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

VSCOs can engage with the most vulnerable and excluded members of the community. Particularly the specialist advice services which are focussed on people who are vulnerable due to age or disability.

4. Please indicate with an “X” the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age			x
Sex			x
Race			x
Disability			x
Sexual orientation		x	
Gender reassignment		x	
Religion or belief			x
Pregnancy or maternity			x
Marriage		x	

5. Please complete **each row** of the checklist with an “X”.

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council’s public sector equality duty?	x	
Does the policy or proposal relate to an area with known inequalities?	x	
Would the policy or proposal change or remove services used by vulnerable groups of people?	x	
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	x	
If you have answered YES to ANY of the above, then proceed to section B. If you have answered NO to ALL of the above, then proceed straight to section D.		

SECTION B – IMPACTS ANALYSIS

1. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

The information and evidence for this analysis has come from the regular monitoring reports supplied by CAB. The data suggests that in September 2017 to September 2018 just over 10,000 people were seen by the CAB. The breakdown was as follows.

Age	Gender:	Disability (self-identified)	Ethnicity:
65 years and above 1624	Male - 4870	4220	White-2813
	Female - 5952		Asian -2165
24 – 65 years			Black-4220
9,199			Mixed-542
			Other -1083

Funding cuts are being implemented from March 2019 onwards, so we do not have current full year data showing the impact of 2018/9 budget decisions. However, our most recent data (from Quarter 2 2019/20) gives some indication of the impact of the funding reduction.

This data suggests that there was an increase in the number of overall clients seen by the CAB in Quarter 2 as 3049 people were seen during this quarter against an average of 2706 a quarter in 2018.

There was also an increase in the proportion of clients from some protected groups; the proportion of BAME people increased to 90% from 70% in 2018/9 and there was an increase of people with disabilities and long term conditions to 45% from around 40%.

It is too soon to tell whether what this data means, as we are not comparing like for like information. However, this is still an encouraging sign that protected groups might be being better targeted and there has not been a significant reduction in the capacity of Brent CAB.

2. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

AGE

Details of impacts identified	Reduction of the generalist advice contract by £35 000 and the Specialist Advice Contract by £18 000 over two years. These contracts are held by the CAB: Around 18% of the CAB clients are over 65%, so cuts could have a disproportionate effect on older people. Specialist advice services provide support to vulnerable people for example home visits for older people who are not able easily leave the house to access benefits and other vital advice. A reduced service could have a disproportionate negative impact on this group.
DISABILITY	
Details of impacts identified	Reduction of the generalist advice contract by £35 000 and the Specialist Advice Contract by £18 000 over two years. These contracts are held by the CAB: Around 40% of CAB clients are disabled or long term sick. Specialist advice services provide support to vulnerable people for example home visits for disabled people who are not able easily leave the house to access benefits and other vital advice. A reduced service could have a disproportionate negative impact on this group.
RACE	
Details of impacts identified	Reduction of the generalist advice contract by £35 000 and the Specialist Advice Contract by £18 000 over two years. These contracts are held by the CAB: In 2018 around 70% of clients were BAME so a reduced service is likely to have a disproportionate negative effect on this group.
SEX	
Details of impacts identified	Reduction of the generalist advice contract by £35 000 and the Specialist Advice Contract by £18 000 over two years. These contracts are held by the CAB: In 2018 around 45% of the CAB clients were male and 55% clients were female. Therefore cuts could have a disproportionate negative effect on female service users.
SEXUAL ORIENTATION	

Details of impacts identified	Reduction of the generalist advice contract by £35 000 and the Specialist Advice Contract by £18 000 over two years. These contracts are held by the CAB: No data available
PREGANCY AND MATERNITY	
Details of impacts identified	Reduction of the generalist advice contract by £35 000 and the Specialist Advice Contract by £18 000 over two years. These contracts are held by the CAB: No data is available, however given the disproportionate number of women accessing Brent CAB it is possible that there may be an effect on pregnancy and maternity.
RELIGION OR BELIEF	
Details of impacts identified	Reduction of the generalist advice contract by £35 000 and the Specialist Advice Contract by £18 000 over two years. These contracts are held by the CAB: No data available, though given the disproportionate number of BAME groups, it is possible that a reduction in service will have an impact on some faith groups
GENDER REASSIGNMENT	
Details of impacts identified	No data available
MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	No data available

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

- Our analysis suggests that LGBT communities will not be affected (though data on this group is not available to confirm this).
- There is less data on the effects on married people/young people/families but it is possible they will be affected (see above).

- BAME groups, women, faith groups and older people are likely to impacted

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

There is a longer term plan for Brent Council to review and redevelop its relationship with the voluntary and community sector, including its contracted provision. Any proposals will be developed in consultation with the affected stakeholders.

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

None

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

Action is being taken to reduce the impact of funding cuts, and so far these appear to be successful.

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

Through quarterly monitoring reports from Brent CAB.

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

There is a possible negative effect on service users and a disproportionate impact on those from some protected groups i.e. BAME, disabled groups, older people and women.

In order to address these potential negative impacts a number of mitigation actions have been put in place.

- Regular monitoring meetings with providers to assess impact of any changes and support them in reconfiguring their services to meet the needs of their service users.
- Brent VSCOs will still be able to bid for money from the Council's comprehensive grant funding programme. Council officers are enhancing the grants policy and procedures to make it easier for organisations to bid for funds. All information relating to grants is readily available on the Council website.
- Continuing to build the capacity of smaller and specialist advice services within the borough through training and development so that they are able to see service users that the CAB are not able to support.
- Funding the online advice service to provide advice to appropriate service users.
- Additional funding for advice by Children and Young People which should be able to provide a service to some children, young people and families.
- Targeting the most vulnerable older and disabled people as part of the specialist advice service to ensure that they receive the best service possible.

SECTION D – RESULT

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

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date
Review & re-design all VCSO contracts over 2020/1 to maximise benefits across all funding streams	Provide a services that meet the needs of the 'in need' service users	Strategy and Partnership Team managers	March 2020
Ensure that information on how to apply for grants is as widely available and as accessible as possible	More organisations able to access Council grant funding.	Partnership and Engagement Manager and Grant Manager	Ongoing
Enhance the Brent Advice Service Partnerships to ensure that smaller advice services	Increase the use of alternative services able to provide advice to targeted groups in particular	Partnership and Engagement Manager	Ongoing 2020
Promote the use of online / self-service information and guidance tool; Brent Advice Matters	More service users receive advice online thus reducing impact on advice services	Partnership and Engagement Manager	Ongoing 2020

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	
REVIEWING OFFICER:	
HEAD OF SERVICE:	

PPP003 Restructure of communications, conference & events department

Reference:	PPP003
Service(s):	Restructure of communications, conference & events department.
Lead Member(s):	Cllr Butt

Policy Proposals:	It is proposed to restructure the communications, conference & events functions in 2020/21 to realign services to enable the team to maximise income generation opportunities while

	focusing more tightly on core corporate communications priorities only.

Financial and Staffing Information

2017/18	
Total budget for the service(s) £'000:	685
Total post numbers in the services(s) (FTE):	17.8

	2019/20	2020/21
	£'000	£'000
Budget implications:	0	100
	FTE	FTE
Proposed staffing reduction	0	0

How would this affect users of this service?

The proposal may require internal departments to be more flexible when booking space in The Drum as the proposal is to generate more commercial income from fee-paying external clients using the space. Internal departments may also need to accept a reduced service level from corporate communications for non-core priority business. Client departments wishing to deliver more communications than the corporate communications team has capacity to deliver directly will need to deliver communications themselves, but with oversight and advice from the corporate communications team, or find one off budgets for short term project support.

Key milestones

Review the commercial income target in early 2020/21 to explore whether all of the above savings can realistically be achieved by generating more income or whether any needs to come from the salaries budget (as there are no materials budgets held in corporate communications).

Key consultations

Consultation with the team 2020/21

Key risks and mitigations

Council department may need to accept that space in The Drum is not always available and seek alternative rooms in the Civic Centre.

Equality impact screening

Is there potential for the proposed saving to have a disproportionate adverse impact on any of the following groups:	
Disabled people	No
Particular ethnic groups	No
Men or Women (include impacts due to pregnancy/maternity)	No (unless brought forward to 19/20)
People of particular sexual orientation/s	No
People who are proposing to undergo, are undergoing or have undergone a process or part of a process of gender reassignment	No
People in particular age groups	No
Groups with particular faiths/beliefs	No
Marriage / civil partnership	No

If the screening has identified a potentially disproportionate adverse impact, you will need to complete an Equality Impact Assessment.

EIA required?:	No
EIA to be completed by:	
Deadline:	

Lead officer for this proposal:	Rob Mansfield

Resources

RES003 and RES004 Service modernisation- reduced opening hours, more digital services and demand management

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	RES 003 and RES 004
DEPARTMENT:	Resources
TEAM:	BCS
LEAD OFFICER:	Margaret Read
DATE:	January 2019

SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

Implementation of digital services to migrate contact handling from more expensive channels such as face to face and telephony. This will include implementation of Robotic Processing Automation and improvements to the current on line offer for customers to increase the number of enquiries handled through self-service facilities including diverting customers away from using telephone and face to face access methods where appropriate. I.e. where services can easily be accessed in this way

It is also proposed to launch a new Universal Offer to all residents which will set an expectation to self-serve using digital channels – in order to provide more personalised and tailored support to those who are most vulnerable. Customers needing help will be identified through a framework which will determine the type of assistance needed with staff empowered to deliver bespoke support required.

Review of current contact to identify key causes of failure demand and remedial action to address root causes and prevent this reoccurring.

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

Robotic processing will not directly affect customers with any protected characteristic – as this will change the way in which work is processed but not the nature of the service being delivered. Automated processes will reduce the need for staff to carry out less complex tasks however staffing reductions will be managed through natural turnover and as such will not directly impact staff.

As our digital offer improves, this will have a beneficial impact for customers as it will improve the ease with which they can self-serve. Customers are already required to self-serve through digital channels following a change to the BCS operating model agreed by cabinet in November 2017. As specific changes are developed, any groups specifically affected will be identified.

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

The changes proposed to achieve savings will not reduce or adversely affect the current service provided to customers but will improve the ease with which customers can access self-service facilities (with assistance where required), reduce processing time and will release capacity in order to deliver more tailored assistance to vulnerable customers (as failure demand reduces). As specific changes are identified through development of a new universal access offer, potential impacts of protected groups may arise and will be addressed through a further Equalities Assessment

4. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age	x		
Sex	x		
Race	x		
Disability	x		
Sexual orientation	x		
Gender reassignment	x		
Religion or belief	x		
Pregnancy or maternity	x		
Marriage	x		

5. Please complete **each row** of the checklist with an “X”.

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council's public sector equality duty?	x	
Does the policy or proposal relate to an area with known inequalities?	x	
Would the policy or proposal change or remove services used by vulnerable groups of people?		x
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	x	
If you have answered YES to ANY of the above, then proceed to section B. If you have answered NO to ALL of the above, then proceed straight to section D.		

SECTION B – IMPACTS ANALYSIS

1. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

A review of Access arrangements was undertaken between Sept 2018 and Jan 2019 and this identified the need to improve aspects of the current self-service offer for residents via the My Account portal. Approximately 45% of visitors to the Customer Services Centre advised that they had tried to resolve their enquiry through other channels, before visiting –including attempts to use self-service facilities such as online systems and attempting to get through on the telephone. Improvements to

address the difficulties that customers are experiencing using self-service facilities including providing computer/device access and assistance to be able to use these facilities where needed should have a positive impact for all protected groups.

The revised offer to vulnerable residents which is being developed as part of the wider customer access review will take account of the specific barriers that are faced when using online services, particularly those who fall into protected groups. For example, this will include those that are digitally excluded i.e. don't have access to facilities and/or do not know how to use online services together with other barriers that some face where even with significant degrees assistance are unlikely to be able to self-serve successfully.

2. For each "protected characteristic" provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state "not applicable".

AGE	
Details of impacts identified	Older people are less likely to be confident in using digital self-service facilities. The newly developed offer to residents will clearly set out the support and help available to them to access self-service facilities and also the arrangements for assisting them where they are unable to self-serve. This may include providing access to facilities, training, and assistance with accessing services including through locality hubs and provision of assistance in peoples' homes where appropriate. Residents that are able to access services themselves by online self service will be diverted to use this method where appropriate in order to prioritise resources to assist those that need additional support
DISABILITY	
Details of impacts identified	People with learning disabilities and those suffering from mental health may find it more difficult to use digital self-service facilities and require assistance or provision of services in a different way. However, in some cases there will be a positive impact through provision of web chat and improved online facilities e.g. in the case of hearing and visual impairment. The newly developed offer to residents will clearly set out the support and help available to them to access self-service facilities and also the arrangements for assisting them or providing services where they are unable to self-serve. This may include providing access to facilities, training, and assistance with accessing services including through locality hubs and provision of assistance in peoples' homes where appropriate. Residents that are able to access services

	themselves by online self service will be diverted to use this method where appropriate in order to prioritise resources to assist those that need additional support
RACE	
Details of impacts identified	People whose first language isn't English may find it more difficult to use digital self-service channels. The newly developed offer to residents will clearly set out the support and help available to them to access self-service facilities and also the arrangements for assisting them where they are unable to self-serve. This may include translation services and facilities through the Council website, training, and assistance with accessing services including through locality hubs. Residents that are able to access services themselves by online self service will be diverted to use this method where appropriate in order to prioritise resources to assist those that need additional support
SEX	
Details of impacts identified	The newly developed offer to residents will clearly set out the support and help available to them to access self service facilities and also the arrangements for assisting them where they are unable to self-serve. This may include providing access to facilities, training, and assistance with accessing services including through locality hub. Residents that are able to access services themselves by online self service will be diverted to use this method where appropriate in order to prioritise resources to assist those that need additional support.
SEXUAL ORIENTATION	
Details of impacts identified	The newly developed offer to residents will clearly set out the support and help available to them to access self service facilities and also the arrangements for assisting them where they are unable to self-serve. This may include providing access to facilities, training, and assistance with accessing services including through locality hubs. Residents that are able to access services themselves by online self service will be diverted to use this method where appropriate in order to prioritise resources to assist those that need additional support.
PREGANCY AND MATERNITY	

Details of impacts identified	The newly developed offer to residents will clearly set out the support and help available to them to access self service facilities and also the arrangements for assisting them where they are unable to self-serve.
RELIGION OR BELIEF	
Details of impacts identified	The newly developed offer to residents will clearly set out the support and help available to them to access self service facilities and also the arrangements for assisting them where they are unable to self-serve. This may include providing access to facilities, training, and assistance with accessing services including through locality hubs. Residents that are able to access services themselves by online self service will be diverted to use this method where appropriate in order to prioritise resources to assist those that need additional support.
GENDER REASSIGNMENT	
Details of impacts identified	The newly developed offer to residents will clearly set out the support and help available to them to access self service facilities and also the arrangements for assisting them where they are unable to self-serve.
MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	The newly developed offer to residents will clearly set out the support and help available to them to access self service facilities and also the arrangements for assisting them where they are unable to self-serve.

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

No

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

As no negative impacts have been identified – engagement is not considered necessary at this stage, however it is likely that further engagement activities will be required as the new access offer is developed in order to test that it is fit for purpose.

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

A data set providing information on the breakdown of types of customers together with potentially protected groups will be captured and collated in order to inform development of the new access offer to Brent residents.

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

Any remaining negative impacts will be identified and justified through another EA following development of the new access offer.

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

A further EA will be carried out when the new access offer is developed further, including arrangements in place for vulnerable customers and those that will need assistance/support to self-serve.

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

There are no further actions identified as this stage but will likely be identified through a further EA on development of the revised access offer.

SECTION D – RESULT

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

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date
Undertake EA of new universal access offer and offer to vulnerable residents	To ensure that the revised access offer does not adversely impact on any protected group and develop any associated action plan	Sally Hodgson	April – May 2019

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Sally Hodgson
REVIEWING OFFICER:	
HEAD OF SERVICE:	Margaret Read (Operational Director)

RES005 Customer services staff rationalisation

Reference:	RES005
Service(s):	Customer Services
Lead Member(s):	Cllr Southwood

Policy Proposals:	Staff rationalisation following transfer of Council Tax to in house provision following expiry of Capita contract in May 2019.

Financial and Staffing Information

2017/18	
Total budget for the service(s) £'000:	11,688
Total post numbers in the services(s) (FTE):	263.15

	2019/20	2020/21
	£'000	£'000
Budget implications:	200	
	FTE	FTE

Proposed staffing reduction	0	5

Proposed saving

Staff rationalisation following transition of service to in house provision in 2019.

How would this affect users of this service?

Reductions will require acceleration of channel shift and thus less resident access to resolve enquiries by phone or face to face. See RES003 & RES004

Key milestones

Restructure of service

- Consultation Nov 2019
- Consultation closes Dec 2019
- Full Implementation by March 2020

Key consultations

Staff affected

Key risks and mitigations

Risks

Consideration has been given to bringing forward this saving of £200K from 2020/21 to 2019/20 however this is not recommended as this would place the Council Tax service at significant risk of becoming destabilised and a consequential risk of reduction to Council Tax collection. The Council Tax service has been outsourced since 1995 and significant efforts will be required to integrate this back to in house provision, harmonise staffing, develop staff, redesign processes and develop the system expertise within Digital services.

Decline in Council Tax collection

Backlogs of work arise

Decline in resident satisfaction with service

Mitigation

Reduction in contacts prior to restructure by channel shift

Review of processes to streamline and automate where possible.

Improve customer journey when using on line facilities and act on feedback provided.

Equality impact screening

Is there potential for the proposed saving to have a disproportionate adverse impact on any of the following groups:	
Disabled people	Y
Particular ethnic groups	Y
Men or Women (include impacts due to pregnancy/maternity)	Y
People of particular sexual orientation/s	Y
People who are proposing to undergo, are undergoing or have undergone a process or part of a process of gender reassignment	Y
People in particular age groups	Y
Groups with particular faiths/beliefs	Y
Marriage / civil partnership	Y

If the screening has identified a potentially disproportionate adverse impact, you will need to complete an Equality Impact Assessment.

EIA required?:	Yes
EIA to be completed by:	Richard Vallis/ Neil Gann
Deadline:	<i>If agreed, TBD</i>

Lead officer for this proposal:	Margaret Read

RES001 Legal savings - Demand management

Reference:	RES001
Service(s):	Resources- Legal Services
Lead Member(s):	Cllr McLennan

Policy Proposals:	Demand Management and income generation: Realising the impact of the Impower demand management review and income generation through raising new and existing fees and charges.

Financial and Staffing Information

2017/18	
Total budget for the service(s) £'000:	3,183
Total post numbers in the services(s) (FTE):	50.5

	2019/20	2020/21
	£'000	£'000
Budget implications:	50	50
	FTE	FTE

Proposed staffing reduction	0	0.4

How would this affect users of this service and what are the key risks and mitigations?

- Reduce support for contract and procurement activity – no longer routinely provide advice on contracts which do not require formal tendering in accordance with the council's standing orders.

This might (subject to detailed consideration) enable the deletion of a 0.4 post or enable the undertaking in house of work that would otherwise be placed externally with more expensive providers. This would mean increased risk for the council in respect of these contracts and shift work to managers and/or the procurement team. Legal Services will provide a suite of basic contract and advice documents to support this.

- Increase in charges for work charged to 3rd parties (s106, s278, residential property work) and establish new 3rd party charges for some commercial property areas.
- Other Demand Management project savings.

This is very uncertain. Reductions in demand are likely to be spread thinly across many posts undertaking different types of legal work. The effect is likely to be increased resilience rather than an ability to delete specific posts. There may be a reduction in spend on external counsel's fees due to increased in-house capacity.

Equality impact screening

Is there potential for the proposed saving to have a disproportionate adverse impact on any of the following groups:	
Disabled people	N
Particular ethnic groups	N
Men or Women (include impacts due to pregnancy/maternity)	N
People of particular sexual orientation/s	N
People who are proposing to undergo, are undergoing or have undergone a process or part of a process of gender reassignment	N
People in particular age groups	N
Groups with particular faiths/beliefs	N
Marriage / civil partnership	N

If the screening has identified a potentially disproportionate adverse impact, you will need to complete an Equality Impact Assessment.

EIA required?:	N

EIA to be completed by:	In the event that a .4 post is deleted, an equality assessment will be undertaken in accordance with the council's Organisational Change policy.
Deadline:	

Lead officer for this proposal:	Debra Norman

Council Tax

Overall Council Tax increase of 3.99%

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	To increase Council tax by 3.99% in 2020/21
DEPARTMENT:	Council Wide
TEAM:	n/a
LEAD OFFICER:	n/a
DATE:	12 December 2019

SECTION A – INITIAL SCREENING

8. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

The Council is required to make significant savings in order to deliver a legally required balanced budget. In order to help overcome this it is proposed to increase Council Tax by 3.99%, where 2% is ring fenced for Adult Social Care and 1.99% is a general increase. This is the maximum increase allowed by government. The proposal will generate an additional £4.9m of recurring income for the Council and therefore avoid having to make further savings to key council services such as adult social care, children's services, etc.

This will impact on all residents within Brent who are eligible to pay Council Tax. Under the changes that are being made to local government funding there is more emphasis on generating more funding locally (i.e. becoming more self-determinant). This proposal is linked to one aspect of local government funding where the Council has some discretion to raise additional funds by increases to Council Tax.

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

All households in Brent, apart from those eligible for 100% Council Tax discount.

The increase by band and the number of properties affected are shown below.

Band	Amount payable in 2019/20	Amount payable in 2020/21	Increase per annum	Increase per month	Increase per week	Total number of

	(Brent share)	(Brent share)				dwellings affected
A	£841.56	£875.16	£33.60	£2.80	£0.65	5,759
B	£981.82	£1,021.02	£39.20	£3.27	£0.75	13,154
C	£1,122.08	£1,166.88	£44.80	£3.73	£0.86	36,928
D	£1,262.34	£1,312.74	£50.40	£4.20	£0.97	35,265
E	£1,542.86	£1,604.46	£61.60	£5.13	£1.18	22,242
F	£1,823.38	£1,896.18	£72.80	£6.07	£1.40	6,415
G	£2,103.90	£2,187.90	£84.00	£7.00	£1.62	3,410
H	£2,524.68	£2,625.48	£100.80	£8.40	£1.94	247

If this proposal is approved it will affect all households in Brent's 123,420 residential dwellings, that will see their Council Tax bills increase, unless they are eligible for 100% Council Tax support. Currently, approximately 15% (19,019 households out of the 123,420) of households in Brent receive full or partial Council Tax support, which means that they will receive full or partial protection from the increase. In addition, those households where there is one eligible adult resident or less (35,355 households), a reduction of up to 50% on their bill will be due.

The Council Tax increase will mean that the budget of Adult Social Care services will grow by a further £2.5m which will enable the service to meet increasing demand of current and future service users who are among the most vulnerable members of Brent's community. This is a positive impact.

10. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

Yes. This proposal will have both positive and negative impacts on some equality groups. However, since the council tax is applicable to all properties it is not considered that the increase targets any one particular group rather it is an increase that is applied across the board. At the same time because the increase is applied to all properties it is not possible to exempt any particular groups. However, on the latter point there is a council tax support scheme that offers support to vulnerable people and people on low incomes.

11. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age		X	
Sex		X	
Race		X	
Disability		X	
Sexual orientation		X	
Gender reassignment		X	
Religion or belief		X	
Pregnancy or maternity		X	
Marriage		X	

12. Please complete **each row** of the checklist with an "X".

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council's public sector equality duty?	X	
Does the policy or proposal relate to an area with known inequalities?		X
Would the policy or proposal change or remove services used by vulnerable groups of people?		X
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	X	
If you have answered YES to ANY of the above, then proceed to section B. If you have answered NO to ALL of the above, then proceed straight to section D.		

SECTION B – IMPACTS ANALYSIS

13. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

The council has analysed the statutory council tax base return which shows the total number of households that are required to pay council tax and the households who are eligible for council tax support.

Other than this is not possible to conduct further impact analyses as the proposed Council Tax increase will affect households in Brent in different ways based on their financial circumstances. However low income households are likely to be protected as they will see increases in their Council Tax support which will either offset in full or partially this increase. The council tax support scheme is also proposed to be reviewed and further analysis on the cumulative impact will be assessed as part of the modelling of the new scheme design.

14. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

AGE	
Details of impacts identified	N/A
DISABILITY	
Details of impacts identified	N/A
RACE	
Details of impacts identified	N/A
SEX	
Details of impacts identified	N/A
SEXUAL ORIENTATION	

Details of impacts identified	N/A
PREGANCY AND MATERNITY	
Details of impacts identified	N/A
RELIGION OR BELIEF	
Details of impacts identified	N/A
GENDER REASSIGNMENT	
Details of impacts identified	N/A
MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	N/A

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

No

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

Yes to both. Significant engagement/ consultation has taken place since October 2018 and more is planned in January and February ahead of the decision being made by full council on 25 February 2019.

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

None required

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

If the proposal is rejected, the Adult Social Care budget will not grow by £2.5m, which could pose challenges to the service to meet growing demand of current and future service users. Failure to meet the increasing demand and diverse needs of current and future service users would have a potential negative impact on those most at need.

The 1.99% increase in Council Tax for general use should have a positive impact on some equality groups as it prevents an additional reduction of £2.4m in the Council's budget. Without a specific alternative proposal the exact benefit to specific groups of residents, staff and external stakeholders is uncertain, but a reduction in budget at short notice will limit the scope of the Council to reduce the impact on services used by vulnerable groups of people.

While the Council Tax proposal will increase the financial pressure on some households, the Council Tax support scheme will partially or fully mitigate this impact for those households who are living on low incomes and are eligible for Council Tax support. Further, single households will have the impact mitigated by the 25% discount offered to single households.

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

If the Council Tax proposal is approved, the Council will continue to monitor the impact on equality groups to ensure that any unexpected consequences and/or adverse impact are promptly identified and mitigated. This will take place when the new council tax support scheme is implemented.

The existing powers under Section 13A of the Local Government Act 1992 allow the Council to reduce Council Tax by up to 100%. The process for applying is detailed on the Council's website.

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

It is proposed to continue with the proposal despite the negative equality impacts. The reason for this is that the Council Tax increase will help to protect front line services. The Council Tax increase proposed is equivalent to approximately £4.9m of additional funding. If this funding was not available, services such as Adult Social Care and Children's Social Care would have to be significantly reduced.

Brent has processes in place for applying a Council Tax support/reduction/exemption to those eligible, therefore whilst this increase will impact across the board, it is anticipated that the impact will be proportionate dependent on an individual's circumstances and whether they receive a Council Tax support/reduction/exemption.

SECTION D – RESULT

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

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date
Review impact of council tax increase at the same time as the implementation of the new council tax support scheme.	Better understanding of negative impacts, which can be mitigated as part of the implementation of the new scheme design	Troy Francis	April – June 2020

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Leigh Wood

REVIEWING OFFICER:	David Graaff
HEAD OF SERVICE:	Asha Vyas

2021/22 – 2022/23 budget proposals

Community Wellbeing

Improved Reablement Offer 2021-23 CWB 001

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	CWB 001 Improved and Effective Reablement Offer for residents discharged from hospital
DEPARTMENT:	Adult Social Care
TEAM:	Reablement Team
LEAD OFFICER:	Sunny Mehmi
DATE:	13 th November 2019

SECTION A – INITIAL SCREENING

7. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

Delivering the outcomes of the review undertaken by Newton Europe in March 2019. The outcome of the review were through a more effective and comprehensive reablement offer:

- the service would be able to support higher needs residents
- discharge resident sooner than the current timeframe
- improve links with hospital and community social care team to improve resident journey; and
- reduce or not require any ongoing packages of homecare

A further savings amount has been identified through reducing the contribution that the local authority makes to the rehab (health) element of the service.

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

Residents who have reablement opportunities.

Staff within the reablement service.

9. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

This proposal has no relevance to equality and the council's public sector equality duty.

The service is open to all adult residents in the Borough who have potential reablement opportunities. The improvements/developments in the service will be

across the universal offer and not effect a specific cohort/group of the population or result in an inequality to a cohort/group.

10. Please indicate with an “X” the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age		X	
Sex		X	
Race		X	
Disability		X	
Sexual orientation		X	
Gender reassignment		X	
Religion or belief		X	
Pregnancy or maternity		X	
Marriage		X	

11. Please complete **each row** of the checklist with an “X”.

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council’s public sector equality duty?		X
Does the policy or proposal relate to an area with known inequalities?		X
Would the policy or proposal change or remove services used by vulnerable groups of people?		x
Has the potential for negative or positive equality impacts been identified with this policy or proposal?		x
If you have answered YES to ANY of the above, then proceed to section B. If you have answered NO to ALL of the above, then proceed straight to section D.		

SECTION B – IMPACTS ANALYSIS

19. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

20. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

AGE	
Details of impacts identified	
DISABILITY	
Details of impacts identified	
RACE	
Details of impacts identified	
SEX	
Details of impacts identified	
SEXUAL ORIENTATION	
Details of impacts identified	

PREGANCY AND MATERNITY	
Details of impacts identified	
RELIGION OR BELIEF	
Details of impacts identified	
GENDER REASSIGNMENT	
Details of impacts identified	
MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	

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

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

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

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

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

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

SECTION D – RESULT

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

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date

SECTION F – SIGN OFF

OFFICER:	
REVIEWING OFFICER:	
HEAD OF SERVICE:	Sunny Mehmi

Placement Review 2021-23 CWB 003

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	CWB 003 Placement Review
DEPARTMENT:	Adult Social Care
TEAM:	Residential and Nursing Team
LEAD OFFICER:	Andrew Davies, Head of Commissioning, ASC
DATE:	5 th December 2019

SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

There are currently c. 180 residential or nursing care placements that cost the council over £1,000 per week.

Placements are to be reviewed as part of the NAIL programme, to determine whether people could be moved to less restrictive placements, or whether there is any scope for fee reduction based on need and care provided.

For some service users, they will be supported to move into new placements, better suited to their needs, but that also deliver a financial saving to the council; other placements will be subject to fee negotiation, if the client is unable to move, but where it is felt a fairer price for the service can be negotiated.

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

Adult Social Care service users living in residential or nursing placements, or high cost supported living placements.

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

Yes. All of the people affected by this proposal have a disability, which will need to be taken into account when considering the impact of moving someone to another service. People will not be moved if it is felt that it is not going to be in their best interests or would have a detrimental impact on them because of their disability. The primary aim of moving someone from one placement to another is to move them to a service that better meets their needs that have arisen because of their disability.

4. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age		X	
Sex		X	
Race		x	
Disability	X		
Sexual orientation		X	
Gender reassignment		X	
Religion or belief		X	
Pregnancy or maternity		X	
Marriage		x	

5. Please complete **each row** of the checklist with an "X".

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council's public sector equality duty?	x	
Does the policy or proposal relate to an area with known inequalities?	x	
Would the policy or proposal change or remove services used by vulnerable groups of people?		x
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	x	
If you have answered YES to ANY of the above, then proceed to section B. If you have answered NO to ALL of the above, then proceed straight to section D.		

SECTION B – IMPACTS ANALYSIS

1. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

ASC keeps up to date records of all placements in residential, nursing and supported living services, the cost of those placements and the primary disability for the person in those services. This has enabled us to identify the high cost placements to focus our review work on, as well as those placements to target for price negotiation where it has been identified that it would not be in the individual best interests to move placement.

2. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

AGE	
Details of impacts identified	None
DISABILITY	
Details of impacts identified	The proposal will have an impact on disability, in so much that all of the people affected by the proposal are living in a residential or nursing care setting because of their disability. By looking at different options for care in less restrictive settings, the proposal will give people more choice and control over how they receive their care and support and should help to promote independence for those who are able to live in less restrictive settings. Nobody will be moved to another care setting without a review, which will assess their care needs and match those to service best able to meet those needs. If a person cannot be moved, the council will seek to re-negotiate the cost of their existing placement so it better reflects assessed care needs.
RACE	
Details of impacts identified	None
SEX	
Details of impacts identified	None

SEXUAL ORIENTATION	
Details of impacts identified	None
PREGANCY AND MATERNITY	
Details of impacts identified	None
RELIGION OR BELIEF	
Details of impacts identified	None
GENDER REASSIGNMENT	
Details of impacts identified	None
MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	None

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

No

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

Engagement is done on an individual basis with service users, their families and friends and advocates, rather than wider consultation with all people in services.

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

None.

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

N/A

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

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

SECTION D – RESULT

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

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Andrew Davies, Head of Commissioning
REVIEWING OFFICER:	
HEAD OF SERVICE:	Andrew Davies, Head of Commissioning

Deprivation of Liberty Safeguards (DoLS) provision 2021-23 CWB 004

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	CWB 004 Deprivation of Liberty (DoLS) – Best Interest Assessors Role
DEPARTMENT:	Community Wellbeing – Adult Social Care
TEAM:	Safeguarding Adults and DoLS
LEAD OFFICER:	Georgina Diba, Head of Safeguarding and Transformation
DATE:	18.11.2019

SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

The change proposed to is to have our permanent staff undertake the Best Interest Assessor (BIA) Role, as opposed to outsourcing this via BIAs externally at a cost of £250.000 per case. This would bring savings to the Council, in addition to practice improvements for those staff trained and act as an incentive for recruitment and retention.

In detail:

The Deprivation of Liberty Safeguards requires six assessments to be undertaken on each case. In Brent, three of these are commissioned to an external Section 12 Doctor, while the remaining three are commissioned to an external Best Interest

Assessors (BIA). The current remuneration to external BIAs is approximately £250.00 per assessments, with some variation due to travel or location outside of London. Section 12 Doctors are not employed by the Council and our insurance / liability makes employing a medical professional directly not viable; the only alternative is with the shift to Liberty Protection Safeguards (LPS), CCGs / Hospitals would also be utilising S12 Doctors and could be employed directly by our health partners that we could use through S75 agreement or joint commissioning, at a potential reduced rate to current.

Brent Council previously invested in staff to undertake training as a best interest assessor. These courses are accredited and cost approximately £1550 for a five-day course. Brent currently have a very limited pool of practitioners trained to undertake this role as follows: 3 social workers, 2 safeguarding adult's managers, and two team managers. Many staff who previously undertook are no longer believed to be working in Brent.

In order to commission a sufficient pool of individuals to undertake these assessments, while reducing impact on current caseloads, it is envisioned 14 BIAs would be required to be in place, undertaking three to four assessments per month.

Benefits:

- Skilled ability to work with mental capacity and best interests improve wider practice in the teams
- Improved flexibility of cover during periods of sickness or leave
- Staff incentivised for career development – leading to training in new role for Liberty of Protection Safeguards (LPS)

It is also important to note that new legislation is coming which changes the DoLS to the new Liberty of Protection Safeguards (LPS). The BIA role will be changed to Approved Mental Capacity Practitioners (AMCP). This is expected for implementation in September 2020 and training before this time for the new AMCP role; this presents an ideal opportunity to train the workforce before the new legislation comes into effect.

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

Internal staff will have the opportunity to further develop their skills, practice and career potential. Training in the new LPS and as an AMCP widens the opportunities available.

There is no impact on residents, our service users or carers. The changes is solely about reducing the external commissioning of BIAs and giving this opportunity to our staff. The role, and the assessments to be completed, are set by legislation and guidance which are not changing.

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

The change does not have relevance to the equality nor the council's public sector equality duty. As noted above there is no impact to residents, and particularly those who would be subject to a Deprivation of Liberty Safeguards authorisation, through the proposed change. The change is solely around providing this role and the requirements through our internal staff as opposed to temp/ agency staff.

4. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age		x	
Sex		x	
Race		x	
Disability		x	
Sexual orientation		x	
Gender reassignment		x	
Religion or belief		x	
Pregnancy or maternity		x	
Marriage		x	

5. Please complete **each row** of the checklist with an "X".

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council's public sector equality duty?		x
Does the policy or proposal relate to an area with known inequalities?		x
Would the policy or proposal change or remove services used by vulnerable groups of people?		x
Has the potential for negative or positive equality impacts been identified with this policy or proposal?		x
If you have answered YES to ANY of the above, then proceed to section B. If you have answered NO to ALL of the above, then proceed straight to section D.		

SECTION B – IMPACTS ANALYSIS

1. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

2. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

AGE	
Details of impacts identified	
DISABILITY	
Details of impacts identified	
RACE	
Details of impacts identified	
SEX	
Details of impacts identified	
SEXUAL ORIENTATION	
Details of impacts identified	
PREGANCY AND MATERNITY	
Details of impacts identified	

RELIGION OR BELIEF	
Details of impacts identified	
GENDER REASSIGNMENT	
Details of impacts identified	
MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	

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

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

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

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

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

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

SECTION D – RESULT

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

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	
REVIEWING OFFICER:	
HEAD OF SERVICE:	18.11.2019 

Community Care recommissioning 2021-23 CWB 005

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	CWB 005 Community Care Recommissioning
DEPARTMENT:	Adult Social Care
TEAM:	Community and Prevention Team
LEAD OFFICER:	Andrew Davies, Head of Commissioning, ASC
DATE:	5 th December 2019

SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

Adult Social Care plans to recommission external day care provision, restructuring provision into a new, lower cost model of care and include Public Health outcomes into a new model of delivery.

Day care in Brent is commissioned according to an old fashioned and out of date model. The majority of provision is expensive, building based and does not offer choice and control to service users. Additionally, there is an over provision of traditional day care in Brent, meaning that providers are not transforming their services, and often wish to increase their costs for the Council to make up for low take up of their services.

The commissioning service are working with providers to redesign services into new models of care that supports more choice and control and promotes less building based provision. Public Health outcomes will also be built into the recommissioned service.

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

Adult Social Care service users that attend day centres, as well as future service users.

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

Yes. The majority of people (but not all) who attend day services have a disability, which will need to be taken into account when considering the impact of re-commissioning services. The two main groups of service users are older people and people with a learning disability.

4. Please indicate with an “X” the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age	X		
Sex		X	
Race		x	
Disability	X		
Sexual orientation		X	
Gender reassignment		X	
Religion or belief		X	
Pregnancy or maternity		X	
Marriage		x	

4. Please complete **each row** of the checklist with an “X”.

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council’s public sector equality duty?	x	
Does the policy or proposal relate to an area with known inequalities?	x	
Would the policy or proposal change or remove services used by vulnerable groups of people?	x	
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	x	
If you have answered YES to ANY of the above, then proceed to section B. If you have answered NO to ALL of the above, then proceed straight to section D.		

SECTION B – IMPACTS ANALYSIS

1. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

We have a significant amount of data to inform this work, but it is still being analysed to inform commissioning options. We are looking numbers of service users using day care services, where they live and travel to day care, the disability of individuals and whether they need transport to attend services. Ethnicity of service users is also being analysed, to inform decisions around cultural sensitive in commissioning services, and whether we should continue to commission culturally specific services.

2. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

AGE	
Details of impacts identified	Older people will continue to be significant users of day services, but the plan will be to broaden the offer to them so that services are better tailored to need. Options are still to be developed, but options for older people will continue to be central to the ASC offer.
DISABILITY	
Details of impacts identified	ASC commissions day services for people with disabilities, and this project is designed to commission services that meet the needs of people in the service now, but also identifying and commissioning services for future service users. There will be changes to services, but people with disabilities will be consulted and involved in the co-design of services, so that they have an input into design and commissioning.
RACE	
Details of impacts identified	None
SEX	
Details of impacts identified	None
SEXUAL ORIENTATION	
Details of impacts identified	None
PREGANCY AND MATERNITY	

Details of impacts identified	None
RELIGION OR BELIEF	
Details of impacts identified	None
GENDER REASSIGNMENT	
Details of impacts identified	None
MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	None

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

No

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

Engagement is done on an individual basis with service users, their families and friends and advocates. Further engagement will also be undertaken as proposals are developed – they will need to be consulted on.

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

None.

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

N/A

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

Ongoing consultation and engagement with service users, families and staff.

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

We do not anticipate any negative impacts on equalities considerations as a result of this project. Inevitably with change, particularly where it involves longstanding services that haven't changed in many years, people will not necessarily be supportive. Much of the work with this project will be focussed on service user engagement so that people input into the changes and are well informed before they take place. But, there is no plan to change the proposal because of equalities considerations.

SECTION D – RESULT

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

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date

SECTION F – SIGN OFF

OFFICER:	Andrew Davies, Head of Commissioning
REVIEWING OFFICER:	
HEAD OF SERVICE:	Andrew Davies, Head of Commissioning

Properties to relieve Temporary Accommodation 2021-23 CWB 006

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	CWB 006 Additional properties obtained which reduce demand for Temporary Accommodation
DEPARTMENT:	Housing
TEAM:	Housing Needs
LEAD OFFICER:	Laurence Coaker
DATE:	21 November 2019

SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

Additional housing stock is expected to become available through the Council New Build programme, which can be used to provide permanent properties for a significant number of homeless households currently in Temporary Accommodation (TA).

The council are also redeveloping a former care home “Knowles House”. When the development is completed, the new building will provide a council owned, in-house TA resource to use as TA for homeless households, reducing the costs of obtaining accommodation from external providers

This means more families could stay in Brent, and fewer families would need to move to poor quality and expensive out of borough Temporary Accommodation.

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

Homeless households who are owed a duty by the council to secure suitable accommodation under the Housing Act 1996 part 7 (S188 and S193)

3. Is there relevance to equality and the council’s public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

Yes, as within the cohort of people accessing this service some protected groups are over-represented compared to the borough as a whole.

This is due to the criteria through which priority need is established under the relevant legislation: for example, a household may be regarded as being in priority need owing to age, to a physical disability or mental health condition or to pregnancy. It is also an effect of poverty and disadvantage: some ethnic groups, for example Black Africans, are over-represented among homeless households. Black Africans make up 21% of current accepted homeless households compared to 7.9% in the wider borough (Source: 2016 population from GLA).

4. Please indicate with an “X” the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age		X	
Sex		X	
Race		X	
Disability	X		
Sexual orientation		X	
Gender reassignment		X	
Religion or belief		X	
Pregnancy or maternity		X	
Marriage		X	

5. Please complete **each row** of the checklist with an “X”.

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council’s public sector equality duty?	X	
Does the policy or proposal relate to an area with known inequalities?	X	
Would the policy or proposal change or remove services used by vulnerable groups of people?	X	
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	X	
If you have answered YES to ANY of the above, then proceed to section B. If you have answered NO to ALL of the above, then proceed straight to section D.		

SECTION B – IMPACTS ANALYSIS

1. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

2. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

AGE	
Details of impacts identified	No adverse impact identified
DISABILITY	
Details of impacts identified	Both the new Knowles House and the new supply of social housing will increase supply of accommodation suitable for disabled households.
RACE	
Details of impacts identified	No adverse impact identified
SEX	
Details of impacts identified	No adverse impact identified
SEXUAL ORIENTATION	
Details of impacts identified	No adverse impact identified
PREGNANCY AND MATERNITY	

Details of impacts identified	No adverse impact identified
RELIGION OR BELIEF	
Details of impacts identified	No adverse impact identified
GENDER REASSIGNMENT	
Details of impacts identified	No adverse impact identified
MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	No adverse impact identified

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

No

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

Yes

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

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

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

Will be monitored in line with the council's Allocation Scheme and statutory reporting requirements to relevant agencies. Also by way of operational meetings.

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

These proposals will introduce more options for households to access suitable accommodation and ease the burden on TA. They will result in an increase in the number of dwellings available for those with accessibility needs.

SECTION D – RESULT

Please select one of the following options. Mark with an "X".

A	CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED	X
B	JUSTIFY AND CONTINUE THE POLICY/PROPOSAL	
C	CHANGE / ADJUST THE POLICY/PROPOSAL	
D	STOP OR ABANDON THE POLICY/PROPOSAL	

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date

SECTION F – SIGN OFF

OFFICER:	

REVIEWING OFFICER:	
HEAD OF SERVICE:	Laurence Coaker

CWB013 New Accommodation for Independent Living (NAIL)

Reference:	CWB013
Service(s):	NAIL
Lead Member(s):	Cllr Farah

Savings Proposals:	Increasing NAIL provision to support more users, but also developing provision to support higher need users and support some users who would have gone into nursing care.

Financial and Staffing Information

2018/19	
Total budget for the service(s) £'000:	11,000
Total post numbers in the services(s) (FTE):	0

	2019/20	2020/21
	£'000	£'000
Proposed saving:	0	2,000
	FTE	FTE
Proposed staffing reduction	0	0

Proposed savings

Despite successful demand management within ASC, the number of people requiring and who are eligible for services is increasing. Therefore we are proposing increasing the number of NAIL units we develop to help mitigate the cost pressure of this demand, but also developing specialist provision to cater for people who might otherwise have needed nursing care.

How would this affect users of this service?

Outcomes for individuals in residential and nursing care and poor – lower life expectancy and poorer quality of life. Individuals who are supported in their own accommodation and who remain in the community have much better outcomes, therefore the impact on service users will be positive.

Key milestones

Identification of additional sites suitable for building or converting into 40+ unit extra care facilities. An additional 59 units of high support NAIL will be required to achieve the savings target.

Once identified, the process for designing, building and managing the construction process will need to be followed, alongside the commissioning of a care provider, identification of suitable individuals to move and individual reviews for all of the identified people.

Key consultations

Individual consultation will be required with identified individuals, and with their families. Depending on the sites located, consultation with neighbours or the community through the planning process may be required.

Key risks and mitigations

Risk involve time delays and unexpected cost when developing provisions. NAIL has been running successfully for 2 years and there has been a lot of useful learning in this time that helps us to mitigate these risks. This includes the use of the HCIB board to monitor the progress of projects with a cross council board who can progress issues if required, stronger relationships between different departments within the Council and stronger project management tools and resources.

Equality impact screening

Is there potential for the proposed saving to have a disproportionate adverse impact on any of the following groups:	
Disabled people	N
Particular ethnic groups	N
Men or Women (include impacts due to pregnancy/maternity)	N
People of particular sexual orientation/s	N
People who are proposing to undergo, are undergoing or have undergone a process or part of a process of gender reassignment	N
People in particular age groups	N
Groups with particular faiths/beliefs	N
Marriage / civil partnership	N

If the screening has identified a potentially disproportionate adverse impact, you will need to complete an Equality Impact Assessment.

EIA required?:	No
EIA to be completed by:	
Deadline:	

Lead officer for this proposal:	Helen Woodland

Children and Young People

Clawback of unused Direct Payments 2021-23 CYP 001

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	Budget Option Information CYP001
DEPARTMENT:	CYP
TEAM:	Localities
LEAD OFFICER:	Stephen Gordon
DATE:	16/12/2019

SECTION A – INITIAL SCREENING

12. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

Implementation of card payments for Direct Payment clients means the service will be able to reclaim unused or overpaid funds immediately, using the same approach taken within Adult Social Care. For a variety of reasons direct payments may no longer be required by a family for the purposes of supporting their child. At present there is a risk that payments can continue for several months before they are amended. The card system will allow officers to identify overpayments and reclaim these rapidly.

CWD Direct Payments value £500k per year. A 5% clawback rate would equal £25K.

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

This policy will affect the families who are allocated direct payments to meet the assessed needs of their children. For a variety of reasons the families may no longer require these payments or do not use the direct payments resource allocation in line with the agreement signed.

14. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

The service provides direct payments to meet the assessed need of children and young people with different abilities. Therefore the current policy is relevant to equality and the council's public sector equality duty towards the children and young adults who are disabled in the borough.

15. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT

	Positive	Neutral/None	Negative
Age		X	
Sex		X	
Race		X	
Disability			X
Sexual orientation		X	
Gender reassignment		X	
Religion or belief		X	
Pregnancy or maternity		X	
Marriage		X	

16. Please complete **each row** of the checklist with an “X”.

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council’s public sector equality duty?	X	
Does the policy or proposal relate to an area with known inequalities?	X	
Would the policy or proposal change or remove services used by vulnerable groups of people?	X	
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	X	
If you have answered YES to ANY of the above, then proceed to section B. If you have answered NO to ALL of the above, then proceed straight to section D.		

SECTION B – IMPACTS ANALYSIS

26. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

Payment cards have been distributed to families. Letter informing the families about the clawback scheme and reminding them of the council’s duty to audit, monitor and review payment, to be sent out between January and March. There will be a number of local surgeries will be arranged to enable parents to feed back. Fully implement the payment by card scheme in April 2020. Clawback will start in April 2020. Measure impact during 2020/21.

27. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

AGE	
Details of impacts identified	There is no impact. The children and young people with assessed needs will continue to receive support as detailed in the legislation.
DISABILITY	
Details of impacts identified	Some of the children and families who are not using the direct payment in line with the service agreement will see their payment reduced or cancelled. More appropriate support will be offered to families, which may include activities in the community, play schemes or care at home depending on the review of their assessment.
RACE	
Details of impacts identified	There is no impact in relation to race
SEX	
Details of impacts identified	There is no impact in relation to sex
SEXUAL ORIENTATION	
Details of impacts identified	There is no impact in relation to sexual orientation
PREGANCY AND MATERNITY	
Details of impacts identified	There is minimal impact as some of the mothers of disabled children and young people may be pregnant when we implement this policy.

RELIGION OR BELIEF	
Details of impacts identified	There is no impact in relation to religion or belief.
GENDER REASSIGNMENT	
Details of impacts identified	There is no impact in relation to gender reassignment
MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	There is no impact in relation to marriage and civil partnership.

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

The impact identified is not unlawful under the Equality Act 2010

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

The parents sign a direct payment agreement where the expectation of how to use the direct payment and Council's responsibility are clearly outlined. Letters will be send out to all families receiving direct payments informing them about this policy.

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

This is the first time that it is being done. The Council will run a regular report to monitor the spent and usage of direct payments fund. If a family has more than 8 weeks of direct payment in the account the difference will be clawed back.

For example

Parent receive £100.00 per week = £400.00 per month

8 weeks = £800.00

Parent account balance is £2000.00 as of the date of the review

Council claws back the difference of £1200.00 (£2000.00 - £800.00 = £1200.00)

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

There will be limited negative impact as the parents will still be left with the necessary funds to cover the expenses that they may have accrued. The purchase Order and payment will continue at the same level even after the clawback until a review of needs and care package. This will impact on the relationship of the parent with the council, however the officers will work closely with the family to minimise impact on children and families. Where necessary the council will offer other services to meet the assessed needs of the children, young adults and their families. All the proposed actions outlined in the policy are in line with the service agreement and legislation.

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

Officers will run regular monitoring reports. For the families where the underspend of the care package is significant, an urgent review will be carried out to ensure that the needs of children, young adults and their carers are assessed, explore the reasons why the underspend has occurred and work with the families to decide the best way to meet the assessed needs.

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

Parents may not use the direct payment for a variety of reasons. The council has a duty to monitor, review and claw back any unspent care package which more than 8 weeks as detailed in the example above. This will have a negative impact as this is the first time that the council is implementing this policy, and the family will need to be informed and the message about the usage of direct payment reinforced. The families will be informed in advance about the action of the Council and given time to explain the reasons for the underspend before any claw back. This may lead to review of the care package and more appropriate support offered to the families, i.e. Care at Home support or activities in the community.

SECTION D – RESULT

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

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date
Letters informing the families about the implementation of this policy	Families to be made aware	Mirjan Dhamo	10/01/2019
Finance Officer to run direct payments report to identify families with over 8 weeks of unspent direct payment	Officers to identify families and write letters to them.	Christian Obande/Finance	Quarterly
Officers to contact families and seeks clarity about the unspent direct payment.	Families to be given the opportunity to explain their situation and agree an action plan.	Shaun West/John Murphy	Quarterly
Officers in social care and finance to review regularly the claw back.	Officers to have a better understanding of the savings and impact on families and budget forecast.	Mirjan Dhamo/Stephen Gordon/Hemma Shah	Quarterly

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Hemma Shah
REVIEWING OFFICER:	Mirjan Dhamo
HEAD OF SERVICE:	Stephen Gordon

Short Break Centre 2021-23 CYP 002

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	Short Break Centre- Sell available beds

DEPARTMENT:	CYP2
TEAM:	Localities
LEAD OFFICER:	Stephen Gordon
DATE:	16/12/2019

SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

It is proposed that existing spare capacity of respite beds/nights at the Short Break Centre (SBC) will be sold to neighbouring authorities at market rates. The intention is to sell the beds at £730 per night for planned stays and £910 for emergency bookings. Selling the nights will reduce voids at relatively low marginal cost as payments for the management, building and other operational costs are within the existing budget.

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

There should be a minimal impact on users of the service. The sale of extra bed nights would bring more users to the centre but as long as this is managed sensitively then it could bring some social benefits to existing users. There is no intention to reduce opportunities for Brent resident young children and young people to use the SBC – the proposal is to better utilise existing capacity that is not required by the service.

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

There is relevance to the equality and council's public sector equality duty. The Short Break Centre provides services for children and young people of different abilities and has a duty to promote such abilities for all the children.

4. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age		X	
Sex		X	
Race		X	
Disability	X		
Sexual orientation		X	

Gender reassignment		X	
Religion or belief	X		
Pregnancy or maternity		X	
Marriage		X	

5. Please complete **each row** of the checklist with an “X”.

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council's public sector equality duty?	X	
Does the policy or proposal relate to an area with known inequalities?	X	
Would the policy or proposal change or remove services used by vulnerable groups of people?		X
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	X	
If you have answered YES to ANY of the above, then proceed to section B. If you have answered NO to ALL of the above, then proceed straight to section D.		

SECTION B – IMPACTS ANALYSIS

1. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

The Short Break Centre is an 8 bedded unit, which provides services for disabled children and young people up the age of 19 in the borough. The beds are allocated based on the assessed needs and agreed at the Disabled Children and Young People's Panel. The registered manager is a core member of the group. The centre has a surplus capacity and some beds are already sold to neighbouring boroughs. The centre has been successful in becoming a preferred provider for London Borough of Barnet. The London Borough of Ealing will be operating their own short break centre from next year. The centre keeps a regular timetable of occupancy and vacancies which is monitored regularly by the registered manager and the service manager. A detailed analysis is carried out by the registered manager to ensure that disabled children and young people who are Brent Residents do not miss out, but also the centre is self-sufficient by generating income to meet the financial demands of the service.

Period	Number of nights used by Brent Residents	Number of nights sold to neighbouring authorities
2017-2018	1455	155
2018-2019	1235	164
2019-2020	821	242

2. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

AGE	
Details of impacts identified	No impact identified. The centre will continue to provide services for children and young people up to the age of 19.
DISABILITY	
Details of impacts identified	The centre will continue to provide services for children and young people of different abilities. This will benefit children, young people and their families as they will be able to meet peers, share their experiences and learn from each other.
RACE	
Details of impacts identified	No impact identified. The centre will continue to provide services to all the children and young people from different ethnic backgrounds.
SEX	
Details of impacts identified	No impact identified
SEXUAL ORIENTATION	

Details of impacts identified	No impact identified
PREGANCY AND MATERNITY	
Details of impacts identified	No impact identified
RELIGION OR BELIEF	
Details of impacts identified	Children, young people and their families come from different backgrounds and religions. They will be able to learn about the differences and respect the diversity of our communities located in different boroughs.
GENDER REASSIGNMENT	
Details of impacts identified	No Impact identified
MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	No impact identified

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

N/A

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

Consultation with service users, their families and the Brent Parent Carer Forum has been carried out with positive feedback obtained. There are regular coffee morning organised with parents and their views will continue to be sought.

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

The registered manager and the service will continue to keep accurate records of the nights /beds being sold to ensure that the negative impact on Brent residents is minimal.

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

There could be a risk of Brent's young people not being able to access this service if too many bed/nights are sold. The present proposal does not involve any reduction in services for Brent's young people. Selling the nights will reduce voids at relatively low marginal cost.

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

Accurate records will be kept to ensure that the number of beds sold does not surplus the number of nights/beds being offered to Brent residents.

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

There is minimal impact of this policy on the Brent residents. There is a risk of reducing the number of beds being available to Brent residents due to being sold, however the current proposal does not involve a reduction in the number of beds/nights being available to Brent residents. The service will sell the surplus, which is needed to generate income to run the centre. The children, young people and their families will continue to socialise, which will enhance their experiences in the centre.

SECTION D – RESULT

Please select one of the following options. Mark with an "X".

A	CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED	X
B	JUSTIFY AND CONTINUE THE POLICY/PROPOSAL	

C	CHANGE / ADJUST THE POLICY/PROPOSAL	
D	STOP OR ABANDON THE POLICY/PROPOSAL	

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date
Monitor the number of nights/beds being sold to neighbouring boroughs.	Number of beds/nights sold does not surplus the beds/nights being used by Brent residents.	Mirjan Dhamo/Nedra Saparamdu	Quarterly
Monitor income generated	Generate income to continue to keep the centre running within the current budget provided	Mirjan Dhamo/Nedra Saparamadu	Quarterly

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Nedra Saparamadu
REVIEWING OFFICER:	Mirjan Dhamo
HEAD OF SERVICE:	Stephen Gordon

Adjusting resources in demand led budgets 2021-23 CYP 003

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	CYP 003 Adjusting resources in demand led budgets
DEPARTMENT:	CYP
TEAM:	Looked After Children and Permanency
LEAD OFFICER:	Onder Beter
DATE:	10.12.2019

SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

The rate of Looked After Children per 10,000 of population is historically low in Brent and the current rate is low when compared to statistical neighbours. Although with expected population growth this number is likely to increase, it should however be in line with the current statistical measure. With the assumption that this low rate continues over the next 18 months a reduction in the budget in line with posts that were held vacant in August 2019 could be implemented to align resource to demand.

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

If the rate of LAC remains as it was in Aug 2019 then it is anticipated that a resource reduction could be achieved without a major negative impact upon looked after children and care leavers.

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

No. If the rate of LAC remains as it was in Aug 2019 then reduction in resource will have no relevance to equality and the council's public sector equality duty. However, in the rate of LAC increases then this savings could not be achieved as it will have a negative impact on service delivery.

4. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age		X	
Sex		X	
Race		X	
Disability		X	
Sexual orientation		X	
Gender reassignment		X	
Religion or belief		X	
Pregnancy or maternity		X	
Marriage		X	

5. Please complete **each row** of the checklist with an "X".

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council's public sector equality duty?	X	

Does the policy or proposal relate to an area with known inequalities?		X
Would the policy or proposal change or remove services used by vulnerable groups of people?		X
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	X	
If you have answered YES to ANY of the above, then proceed to section B. If you have answered NO to ALL of the above, then proceed straight to section D.		

SECTION B – IMPACTS ANALYSIS

1. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

Key milestones

Quarterly monitoring of LAC numbers within existing performance reports will be reviewed to consider whether current levels remain stable. A decision would need to be made by the service by early 2021 regarding the resource required to meet demand for the subsequent two financial years.

Key consultations

Lead Member will be kept regularly informed and service users and staff will be kept regularly informed and their views sought through internal mechanisms.

Key risks and mitigations

- Risk that caseloads will rise, particularly as demographic changes increase the number of Secondary age children. (65% of current LAC are 13+). Risk that continuing complexity of need accelerates due to issues regarding contextual safeguarding and serious youth violence. This is an area of risk and if the rate of LAC increases we could not achieve this saving. Hence the service will make a decision in early 2021 to re-assess the situation. For example, the number of LAC has increased since Aug by 26 more children in care (in Sep and Oct 2019) and if demand continues growing then we would not be able to go ahead with the savings.
- Population growth is expected to stabilise following the current primary bulge moving through the school system. A number of activities as set out in the current borough plan are intended to improve outcomes and manage risk effectively for target groups at higher risk of becoming looked after

2. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

AGE

Details of impacts identified	N/A if the rate of LAC remains as low as it was in Aug 2019. Otherwise, the Service will not reduce resources as suggested.
DISABILITY	
Details of impacts identified	N/A if the rate of LAC remains as low as it was in Aug 2019. Otherwise, the Service will not reduce resources as suggested.
RACE	
Details of impacts identified	N/A if the rate of LAC remains as low as it was in Aug 2019. Otherwise, the Service will not reduce resources as suggested.
SEX	
Details of impacts identified	N/A if the rate of LAC remains as low as it was in Aug 2019. Otherwise, the Service will not reduce resources as suggested.
SEXUAL ORIENTATION	
Details of impacts identified	N/A if the rate of LAC remains as low as it was in Aug 2019. Otherwise, the Service will not reduce resources as suggested.
PREGANCY AND MATERNITY	
Details of impacts identified	N/A if the rate of LAC remains as low as it was in Aug 2019. Otherwise, the Service will not reduce resources as suggested.
RELIGION OR BELIEF	
Details of impacts identified	N/A if the rate of LAC remains as low as it was in Aug 2019. Otherwise, the Service will not reduce resources as suggested.
GENDER REASSIGNMENT	

Details of impacts identified	N/A if the rate of LAC remains as low as it was in Aug 2019. Otherwise, the Service will not reduce resources as suggested.
MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	N/A if the rate of LAC remains as low as it was in Aug 2019. Otherwise, the Service will not reduce resources as suggested.

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

N/A

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

The Lead Member will be kept informed. Staffing and budgets are standing items of management meetings where discussions take place. This will be used as platform to inform first line managers. Staff forums will be platforms to discuss the arrangements with all staff if the current rate of LAC remains as it was in Aug 2019.

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

The number of LAC needs to be monitored.

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

If the rate of LAC increases, the proposal will not be taken forward.

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

Quarterly monitoring of LAC numbers within existing performance reports will be reviewed to consider whether current levels remain stable. A decision would need to be made by the service by early 2021 regarding the resource required to meet demand for the subsequent two financial years.

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions

you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

The Service will continue monitoring the number of children in care using well-established performance indicators. If the current rate of children in care remains as they were in August 2019, then staffing resource would be reduced by 100k. However, if the rate of children in care increases then the Service will not reduce the resources as this would be an area of growth in demand.

SECTION D – RESULT

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

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date
Continue to monitor number of LAC and allocation list of workers	To identify trend of demand and take action as per the above proposal.	Head of Service - LACP	March 2021

SECTION F – SIGN OFF

OFFICER:	Onder Beter
REVIEWING OFFICER:	Nigel Chapman
HEAD OF SERVICE:	Onder Beter – 10/12/19

Review and zero base other service area budgets 2021-23 CYP 004

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	2021-23 CYP 004 CYP Cross Service
DEPARTMENT:	Children and Young People
TEAM:	Safeguarding, Partnerships and Strategy
LEAD OFFICER:	Brian Grady, Operational Director, Safeguarding, Partnerships and Strategy
DATE:	3 rd December 2019

SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

The proposal is to review service area budgets to achieve and accumulate minor savings.

To achieve the saving a budget analysis will be carried out on non-staff and non-frontline service budgets across CYP. Management will then challenge budget holders to produce updated service delivery plans focussed on outcomes which can be costed by the finance team.

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

The following groups have been considered in impacts when reviewing budget lines
 Children and young people
 Parents/Carers
 Schools
 Practitioners working with children and young people

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

The council's public sector equality duty is relevant, as the review of budgets was considered any potential impact on vulnerable groups.

4. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age		X	
Sex		X	
Race		X	
Disability		X	

Sexual orientation		X	
Gender reassignment		X	
Religion or belief		X	
Pregnancy or maternity		X	
Marriage		X	

5. Please complete **each row** of the checklist with an "X".

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council's public sector equality duty?	x	
Does the policy or proposal relate to an area with known inequalities?		x
Would the policy or proposal change or remove services used by vulnerable groups of people?		x
Has the potential for negative or positive equality impacts been identified with this policy or proposal?		x
If you have answered YES to ANY of the above, then proceed to section B. If you have answered NO to ALL of the above, then proceed straight to section D.		

SECTION B – IMPACTS ANALYSIS

1. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

The analysis so far and budget review exercise has concentrated on those budgets which have historically underspent or which represent discretionary spend. For example; 1. The CYP Learning and Development budget is centralised in the Safeguarding and Quality Assurance service and has underspent in recent years. A costed plan could be designed to meet key requirements, such as ensuring Continuous Professional Development for social workers, and deliver a saving through more efficient procurement. 2. Eliminate recently unused budgets such as the £23k 'family conference budget' which historically was used to commission family conferences. None of the budget lines so far have identified any negative impacts for children and young people, Parents/Carers, Schools and practitioners working with children and young people.

2. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

AGE	
Details of impacts identified	Not applicable
DISABILITY	
Details of impacts identified	Not applicable
RACE	
Details of impacts identified	Not applicable
SEX	
Details of impacts identified	Not applicable
SEXUAL ORIENTATION	
Details of impacts identified	Not applicable
PREGANCY AND MATERNITY	
Details of impacts identified	Not applicable
RELIGION OR BELIEF	

Details of impacts identified	Not applicable
GENDER REASSIGNMENT	
Details of impacts identified	Not applicable
MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	Not applicable

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

No

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

Yes

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

No areas are identified

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

No negative impacts have been identified.

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

This will be monitored through the OD Safeguarding, Partnerships and Strategy reviewing each budget line reduction proposals prior to agreement.

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

It is concluded that this policy will result in no negative impacts and should proceed.

SECTION D – RESULT

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

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date
The budget area review to assess any unidentified impacts prior to the end of the financial year	That all budget reductions can be achieved with no impact for children and young people	OD, Safeguarding, Partnerships and Strategy	April 2020

SECTION F – SIGN OFF

OFFICER:	Brian Grady 3 rd December 2019
REVIEWING OFFICER:	

HEAD OF SERVICE:	Brian Grady

Increased income target for the Gordon Brown Centre 2021-23 CYP 005

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	2021-23 CYP 005 Increased income target for the Gordon Brown Centre
DEPARTMENT:	Children and Young People
TEAM:	Setting and School Effectiveness
LEAD OFFICER:	John Galligan, Head of Setting and School Effectiveness
DATE:	3 rd December 2019

SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

Increased income target for the Gordon Brown Outdoor Education Centre. The Centre has benefitted from recent capital investment, and successful summer trading in 2019 indicates a forecast surplus of £50k against the current net zero budget.

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

Children and young people aged 0-18
Parents/Carers
Schools
Practitioners working with children and young people

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

This proposal extends the use of the Gordon Brown Education Centre. The increased access to this resource has not been identified as having any relevance to equality and the council's public sector equality duty.

4. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age		X	
Sex		X	
Race		X	

Disability		X	
Sexual orientation		X	
Gender reassignment		X	
Religion or belief		X	
Pregnancy or maternity		X	
Marriage		X	

6. Please complete **each row** of the checklist with an “X”.

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council’s public sector equality duty?		x
Does the policy or proposal relate to an area with known inequalities?		x
Would the policy or proposal change or remove services used by vulnerable groups of people?		x
Has the potential for negative or positive equality impacts been identified with this policy or proposal?		x
If you have answered YES to ANY of the above, then proceed to section B. If you have answered NO to ALL of the above, then proceed straight to section D.		

SECTION B – IMPACTS ANALYSIS

1. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

This proposal extends the use of the Gordon Brown Education Centre. The Centre has benefitted from recent capital investment. Successful summer trading in 2019 indicates a forecast surplus of £50k against the current net zero budget which has been the basis of analysis to project future income targets, alongside engagement with Brent schools. The planned income generation from the selling of daytime and residential activity bookings will be reviewed quarterly through 2019/20 and into 20/21

2. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

AGE	
Details of impacts identified	Not applicable
DISABILITY	
Details of impacts identified	Not applicable
RACE	
Details of impacts identified	Not applicable
SEX	
Details of impacts identified	Not applicable
SEXUAL ORIENTATION	
Details of impacts identified	Not applicable
PREGNANCY AND MATERNITY	
Details of impacts identified	Not applicable
RELIGION OR BELIEF	
Details of impacts identified	Not applicable

GENDER REASSIGNMENT	
Details of impacts identified	Not applicable
MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	Not applicable

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

No

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

The Gordon Brown Outdoor Education Centre management teams have engaged with the schools which are identified as the key stakeholders and potential customers for increased usage were representative. No further engagement is required.

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

No areas are identified

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

No negative impacts have been identified.

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

This will be monitored through the management supervision of the centre manager

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

It is concluded that this policy will result in no negative impacts and should proceed.

SECTION D – RESULT

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

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date
Impact of extended use to be monitored through supervision of the Centre manager	No negative impacts expected from extending the use of the Centre	Head of Setting and School Effectiveness	April 2020

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Brian Grady 3 rd December 2019
REVIEWING OFFICER:	
HEAD OF SERVICE:	John Galligan

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	CYP006
DEPARTMENT:	Safeguarding Performance & Strategy
TEAM:	Forward Planning, Performance & Partnerships
LEAD OFFICER:	Shirley Parks
DATE:	18/11/19

SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

Budget saving of £50k on commissioning activity achieved through a 10% saving on commissioning when contracts become due.

The CYP procurement forward plan identifies a number of contracts which are due to go out to tender for new contracts to commence for April 2021, including for Speech and Language Therapy services and Mental Health and Wellbeing services.

This will be achieved through:

- retendering services to achieve competitive pricing
- bringing any spot-purchased services into contracts where possible to achieve economies of scale
- redesigning services to achieve efficiencies

There will be a number of different service proposals, each of which will be subject to a detailed equality impact assessment to mitigate any negative impacts.

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

Children and young people aged 0-18 and 18-25 with an EHCP

Parents/Carers

Schools

Practitioners working with children and young people

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

Yes

4. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age		X	
Sex		X	
Race		X	
Disability		X	
Sexual orientation		X	
Gender reassignment		X	
Religion or belief		X	
Pregnancy or maternity		X	
Marriage		X	

5. Please complete **each row** of the checklist with an "X".

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council's public sector equality duty?	X	
Does the policy or proposal relate to an area with known inequalities?		X
Would the policy or proposal change or remove services used by vulnerable groups of people?		X
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	X	
If you have answered YES to ANY of the above, then proceed to section B. If you have answered NO to ALL of the above, then proceed straight to section D.		

SECTION B – IMPACTS ANALYSIS

1. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

The budget proposal relates to a number of commissioned services that either support children with special needs and disabilities or vulnerable children and young people, where the services are likely to be retendered for 2021/22. The intention is to apply a 10% saving to contracts to be retendered to achieve a more efficient unit cost. If contract extensions are applied then savings will be achieved through negotiation.

The commissioned services that this is likely to apply to include:

Speech and Language Services

Mental health and wellbeing services

Semi-independent block contract for services

Early help services

As with any re-commissioning process, there could be a redesign of statutory services (e.g. speech and language services). This will be informed by feedback from service users and by demand analysis. Recommissioning will ensure that children who have a statutory right to services continue to receive them.

It is not anticipated that services aimed at supporting vulnerable children (e.g. mental health and wellbeing services or early help services) will reduce in terms of scope, but that market competition will drive efficiencies. There could, however, be some redesign of services for example to increase alignment with CCG commissioned services which could drive efficiencies. Any redesign will be informed by service user feedback and detailed demand analysis.

2. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

AGE	
Details of impacts identified	The same age range of children and young people will continue to receive services.
DISABILITY	
Details of impacts identified	Statutory services for children and young people with a disability will continue. Non-statutory services will continue to

	be available for children and young people regardless of whether they have a disability.
RACE	
Details of impacts identified	All services will continue to impact equally upon all children and young people and their parents/carers regardless of race.
SEX	
Details of impacts identified	All services will continue to impact equally upon all children and young people and their parents/carers regardless of gender.
SEXUAL ORIENTATION	
Details of impacts identified	All services will continue to impact equally upon all children and young people and their parents/carers regardless of sexual orientation.
PREGANCY AND MATERNITY	
Details of impacts identified	Services are fully inclusive and aim to improve outcomes for all children and young people and their families.
RELIGION OR BELIEF	
Details of impacts identified	All services will continue to impact equally upon all children and young people and their parents/carers regardless of religion or belief.
GENDER REASSIGNMENT	
Details of impacts identified	All services will continue to impact equally upon all children and young people and their parents/carers.
MARRIAGE & CIVIL PARTNERSHIP	

Details of impacts identified	All services will continue to impact equally upon all children and young people and their parents/carers.

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

No

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

Engagement will be undertaken with stakeholders and service users at the point of recommissioning any service.

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

Each service will be recommissioned based on an updated and detailed analysis of service need, including the views of target user groups.

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

Negative impacts are not anticipated. However, to achieve anticipated savings it may be necessary to reduce the scope of non-statutory services. The focus will be to ensure that the most vulnerable children and young people and their families continue to be supported through commissioned services.

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

All commissioned services are subject to contract monitoring and evaluation. This includes regular feedback from service users, monitoring complaints and compliments, service data analysis and contract monitoring meetings. The Commissioning Team hosts a quarterly stakeholder meeting that reviews service effectiveness and informs contract monitoring meetings.

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy

despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

The commissioning of services in scope of the budget savings proposal will be undertaken to achieve efficiencies primarily through market engagement and through improved alignment with CCG commissioned services.

It is not intended that the scope of any service would reduce unless this is underpinned by analysis that indicates reduced demand. All services that are commissioned are subject to detailed analysis of demand. If a service is no longer required or if a reduced service is considered appropriate to meet need, the opportunity will be taken to realise budget savings.

SECTION D – RESULT

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

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date
Demand analysis for each service, including evidence of impact of current services	Confirmation of commissioned services required and of what works well and what needs to be redesigned	Tanuja Saujani, Commissioning and Market Insight Manager	June 2020
Consultation with children and parents/carers on specifications	Services that will be procured are informed by service user perspective including what	Tanuja Saujani, Commissioning and Market Insight Manager	July 2020

	works well and what needs to be redesigned		
Market testing and market development	Determine if market will respond positively to tendering process in the context of specification and available budget	Tanuja Saujani, Commissioning and Market Insight Manager	September 2020

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Shirley Parks, Head of Forward Planning, Performance and Partnerships
REVIEWING OFFICER:	Brian Grady, Operational Director - 14 November 2019
HEAD OF SERVICE:	Shirley Parks, Head of Forward Planning, Performance and Partnerships

Regeneration & Environment

General Efficiencies across R&E 2021-23 R&E 001

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	R&E 001 General Efficiencies across R&E
DEPARTMENT:	R&E
TEAM:	N/A
LEAD OFFICER:	C Whyte
DATE:	15/11/2019

SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

This exercise is intended to remove funds that have been deemed to be surplus to the structural revenue requirement of the directorate, i.e. not needed, and so their removal would have no adverse operational impact.

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

No sector of the community.

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

No. The resources to be removed are surplus to requirement so would have no effect on service delivery.

4. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age		x	
Sex		x	
Race		x	
Disability		x	
Sexual orientation		x	
Gender reassignment		x	
Religion or belief		x	
Pregnancy or maternity		x	
Marriage		x	

5. Please complete **each row** of the checklist with an "X".

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council's public sector equality duty?		x
Does the policy or proposal relate to an area with known inequalities?		x
Would the policy or proposal change or remove services used by vulnerable groups of people?		x
Has the potential for negative or positive equality impacts been identified with this policy or proposal?		x
If you have answered YES to ANY of the above, then proceed to section B. If you have answered NO to ALL of the above, then proceed straight to section D.		

SECTION B – IMPACTS ANALYSIS

1. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to

validate them with evidence. If you have monitoring information available, include it here.

- For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

AGE	
Details of impacts identified	
DISABILITY	
Details of impacts identified	
RACE	
Details of impacts identified	
SEX	
Details of impacts identified	
SEXUAL ORIENTATION	
Details of impacts identified	
PREGANCY AND MATERNITY	

Details of impacts identified	
RELIGION OR BELIEF	
Details of impacts identified	
GENDER REASSIGNMENT	
Details of impacts identified	
MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	

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

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

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

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

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

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

SECTION D – RESULT

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

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date

SECTION F – SIGN OFF

OFFICER:	C Whyte
REVIEWING OFFICER:	
HEAD OF SERVICE:	

Lighting Maintenance 2021-23 R&E 002

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	R&E 002 10% efficiency saving from new lighting maintenance contract
DEPARTMENT:	R&E
TEAM:	Parking & Lighting
LEAD OFFICER:	Gavin F Moore
DATE:	13.11.2019

SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

Following 20 year PFI lighting maintenance contract, and £5 million investment in LED and CMS technology, and two additional years trouble-shooting using revenue funding, by the end of March 2021 we should be in a position to make an efficiency saving of 10% on the lighting maintenance budget. This 10% efficiency saving is a corporate requirement on all contract re-letting and renewals.

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

No-one. It is an efficiency saving.

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

No. It is an efficiency saving, pure and simple.

4. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age		x	
Sex		x	
Race		x	
Disability		x	
Sexual orientation		x	
Gender reassignment		x	
Religion or belief		x	
Pregnancy or maternity		x	
Marriage		x	

5. Please complete **each row** of the checklist with an “X”.

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council’s public sector equality duty?		x
Does the policy or proposal relate to an area with known inequalities?		x
Would the policy or proposal change or remove services used by vulnerable groups of people?		x
Has the potential for negative or positive equality impacts been identified with this policy or proposal?		x
If you have answered YES to ANY of the above, then proceed to section B. If you have answered NO to ALL of the above, then proceed straight to section D.		

SECTION B – IMPACTS ANALYSIS

1. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

2. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

AGE

Details of impacts identified	
DISABILITY	
Details of impacts identified	
RACE	
Details of impacts identified	
SEX	
Details of impacts identified	
SEXUAL ORIENTATION	
Details of impacts identified	
PREGANCY AND MATERNITY	
Details of impacts identified	
RELIGION OR BELIEF	
Details of impacts identified	
GENDER REASSIGNMENT	

Details of impacts identified	
MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	

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

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

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

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

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

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy

despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

SECTION D – RESULT

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

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date

SECTION F – SIGN OFF

OFFICER:	Kieron Condon
REVIEWING OFFICER:	Anthony Vartanian
HEAD OF SERVICE:	Gavin F Moore

Schemes/Drainage fees 2021-23 R&E 003

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	R&E 003 Schemes/ Drainage Fees
DEPARTMENT:	R&E
TEAM:	Highways and Infrastructure
LEAD OFFICER:	Tony Kennedy
DATE:	15/11/2019

SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

£100k additional from an increase in the level of fees applied to the delivery of large scale funded infrastructure improvement projects.

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

No sector of the community

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

No. These are fees applied to contractors, not members of the community.

4. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age		x	
Sex		x	
Race		x	
Disability		x	
Sexual orientation		x	
Gender reassignment		x	
Religion or belief		x	
Pregnancy or maternity		x	
Marriage		x	

5. Please complete **each row** of the checklist with an "X".

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council's public sector equality duty?		x
Does the policy or proposal relate to an area with known inequalities?		x
Would the policy or proposal change or remove services used by vulnerable groups of people?		x
Has the potential for negative or positive equality impacts been identified with this policy or proposal?		x
If you have answered YES to ANY of the above, then proceed to section B. If you have answered NO to ALL of the above, then proceed straight to section D.		

SECTION B – IMPACTS ANALYSIS

1. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

2. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

AGE	
Details of impacts identified	
DISABILITY	
Details of impacts identified	
RACE	

Details of impacts identified	
SEX	
Details of impacts identified	
SEXUAL ORIENTATION	
Details of impacts identified	
PREGANCY AND MATERNITY	
Details of impacts identified	
RELIGION OR BELIEF	
Details of impacts identified	
GENDER REASSIGNMENT	
Details of impacts identified	
MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	

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

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

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

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

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

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

SECTION D – RESULT

Please select one of the following options. Mark with an “X”.		
A	CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED	x

B	JUSTIFY AND CONTINUE THE POLICY/PROPOSAL	
C	CHANGE / ADJUST THE POLICY/PROPOSAL	
D	STOP OR ABANDON THE POLICY/PROPOSAL	

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date

SECTION F – SIGN OFF

OFFICER:	Tony Kennedy
REVIEWING OFFICER:	Chris Whyte
HEAD OF SERVICE:	Chris Whyte

Damage Cost Recovery 2021-23 R&E 004

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	R&E 004
DEPARTMENT:	R&E
TEAM:	Neighbourhood Management
LEAD OFFICER:	Simon Finney
DATE:	15/11/2019

SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

This creates £50k net revenue by deploying a dedicated officer to more proactively recover the cost of repairs from developers and builders causing damage to the public highway.

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

Contractors undertaking works will be charged and held accountable for the damage they may cause to footways in Brent.

Residents may see more frequent footway repairs as a consequence.

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

Yes. Footways may be in better condition as a consequence. Hazards will be removed.

4. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age	x		
Sex		x	
Race		x	
Disability	x		
Sexual orientation		x	
Gender reassignment		x	
Religion or belief		x	
Pregnancy or maternity	x		
Marriage		x	

5. Please complete **each row** of the checklist with an "X".

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council's public sector equality duty?	x	
Does the policy or proposal relate to an area with known inequalities?	x	

Would the policy or proposal change or remove services used by vulnerable groups of people?		x
Has the potential for negative or positive equality impacts been identified with this policy or proposal?		x
If you have answered YES to ANY of the above, then proceed to section B. If you have answered NO to ALL of the above, then proceed straight to section D.		

SECTION B – IMPACTS ANALYSIS

1. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

Footway damage is often caused by private contractors. Trip hazards can be created as a consequence. The council is subject to insurance claims resulting from injuries due to these hazards.

2. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

AGE	
Details of impacts identified	The elderly may be more susceptible to trip hazards. Cost recovery will see more frequent repairs, thus mitigating this risk.
DISABILITY	
Details of impacts identified	Those with accessibility considerations may be more susceptible to footway hazards. Cost recovery will see more frequent repairs, thus mitigating this risk.
RACE	
Details of impacts identified	
SEX	

Details of impacts identified	
SEXUAL ORIENTATION	
Details of impacts identified	
PREGANCY AND MATERNITY	
Details of impacts identified	Those with accessibility considerations may be more susceptible to footway hazards. Cost recovery will see more frequent repairs, thus mitigating this risk.
RELIGION OR BELIEF	
Details of impacts identified	
GENDER REASSIGNMENT	
Details of impacts identified	
MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	

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

N/A

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

N/A

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

N/A

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

N/A

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

The number of repairs will be recorded and any reduction in insurance claims will be tracked to establish the longer term benefit of the proposal.

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

The initiative will have only positive equality implications.

SECTION D – RESULT

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

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date

SECTION F – SIGN OFF

OFFICER:	Simon Finney
REVIEWING OFFICER:	Chris Whyte
HEAD OF SERVICE:	Chris Whyte

Building Control Fees Review 2021-23 R&E 005

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	R&E 005 Building Control Fees Review
DEPARTMENT:	Regeneration
TEAM:	Building Control
LEAD OFFICER:	Rohail Bhandari
DATE:	5/12/2019

SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

a) Increase building control published fees by 10% for schedule 2 new dwellings, up to 15 dwellings
b) More business from in-house council-led developments to raise additional fees

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

External customers and Brent in-house property development teams

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

No. This relates to fee increases only – fees charged to developers

4. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age		X	
Sex		X	
Race		X	
Disability		X	
Sexual orientation		X	
Gender reassignment		X	
Religion or belief		X	
Pregnancy or maternity		X	
Marriage		X	

5. Please complete **each row** of the checklist with an "X".

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council's public sector equality duty?		X
Does the policy or proposal relate to an area with known inequalities?		X
Would the policy or proposal change or remove services used by vulnerable groups of people?		X
Has the potential for negative or positive equality impacts been identified with this policy or proposal?		X
If you have answered YES to ANY of the above, then proceed to section B. If you have answered NO to ALL of the above, then proceed straight to section D.		

SECTION B – IMPACTS ANALYSIS

1. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

2. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

AGE	
Details of impacts identified	
DISABILITY	
Details of impacts identified	
RACE	
Details of impacts identified	
SEX	
Details of impacts identified	
SEXUAL ORIENTATION	
Details of impacts identified	

PREGANCY AND MATERNITY	
Details of impacts identified	
RELIGION OR BELIEF	
Details of impacts identified	
GENDER REASSIGNMENT	
Details of impacts identified	
MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	

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

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

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

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

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

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

SECTION D – RESULT

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

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date

SECTION F – SIGN OFF

OFFICER:	Rohail Bhandari
REVIEWING OFFICER:	John Flynn
HEAD OF SERVICE:	Gerry Ansell

Passenger Transport (2021-23 R&E 006)

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	R&E006
DEPARTMENT:	R&E
TEAM:	BTS
LEAD OFFICER:	R Trout
DATE:	15/11/2019

SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

The proposal is to relocate a number of SEN buses back to a Brent depot from Harrow to reduce operating times and costs.

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

Passengers with SEN

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

Yes. This may affect young individuals with disabilities by altering their current daily routine and this may cause anxiety and upset.

4. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age	x		x
Sex		x	
Race		x	
Disability	x		x
Sexual orientation		x	
Gender reassignment		x	
Religion or belief		x	
Pregnancy or maternity		x	
Marriage		x	

5. Please complete **each row** of the checklist with an “X”.

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council’s public sector equality duty?	x	
Does the policy or proposal relate to an area with known inequalities?	x	
Would the policy or proposal change or remove services used by vulnerable groups of people?		x
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	x	
If you have answered YES to ANY of the above, then proceed to section B. If you have answered NO to ALL of the above, then proceed straight to section D.		

SECTION B – IMPACTS ANALYSIS

1. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

Pupils with special educational needs (SEN) are the principle users of this service. Any change to their current daily routine may cause inconvenience, anxiety and/or upset. Previous passenger satisfaction surveys have identified that any change to routine can have an adverse impact on passengers.

2. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

AGE	
Details of impacts identified	Users of the service, and so those likely to be affected, are mainly school age.
DISABILITY	
Details of impacts identified	Users of the service, and so those likely to be affected, mainly have a disability or learning difficulties.
RACE	
Details of impacts identified	
SEX	
Details of impacts identified	
SEXUAL ORIENTATION	
Details of impacts identified	
PREGANCY AND MATERNITY	
Details of impacts identified	
RELIGION OR BELIEF	

Details of impacts identified	
GENDER REASSIGNMENT	
Details of impacts identified	
MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	

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

No

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

Communication of any changes will need to be carefully considered and sensitively delivered.

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

The precise detail of the operational changes are still to be determined.

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

It is envisaged that the negative impact associated with any such change in routine, will be mitigated overtime by the benefit of having shorter, more convenient journeys for passengers.

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

The service and its outcomes for its users are routinely monitored on a daily basis.

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

Any negative impact will be short term. The change will create efficiencies in terms of routes and driving times and so create better comfort for passengers.

SECTION D – RESULT

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

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date
Plan routes to minimise journey times	Reduced journey times, better comfort.	R Trout	March 2019
Communicate changes thoroughly and sensitively	Well informed passengers, reduced anxiety.	R Trout	March 2019

SECTION F – SIGN OFF

OFFICER:	Richard Trout
REVIEWING OFFICER:	Chris Whyte
HEAD OF SERVICE:	Chris Whyte

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	Additional pre-application charges for specialists e.g. conservation and design, landscaping
DEPARTMENT:	Planning and Development Services
TEAM:	Spatial Planning / Development Management Planning
LEAD OFFICER:	Gerry Ansell
DATE:	

SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

The service already charges considerable amounts for a pre-application service, tiered to reflect the size of the proposal and the amount of time spent on giving pre-app advice. For all but the smallest schemes, the charge includes some input from specialist design services where required e.g. conservation and design, trees and landscaping.

However, there may be some instances where the specialist advice goes beyond the basic service, in which case an additional charge could be levied, in agreement with the applicant.

A wide range of applications from small householder to major urban developments are received. Equality information is monitored for planning applications but not for pre-application stage.

The proposal would exclude categories 1 and 2 (below) and would therefore allow disabled people to improve their homes without a planning fee. Households would

Service	Type of development	Fee	Response
PREAPP 1	Householder (extensions and alterations to a dwelling)	£240 (£200+VAT)	Written*
PREAPP 2	Small Minor development (1 unit / up to 99 sq.m.)	£360 (£300+VAT)	Written*
PREAPP 3	Medium Minor development (2 to 4 units / 100 – 499 sq.m.)	£960 (£800+VAT)	Written*
PREAPP 4	Large Minor development (5 to 9 units / 500 – 999 sq.m.)	£1800 (£1,500+VAT)	Written and meeting
PREAPP 5	Major development (10 to 24 units / 1,000 - 1,999 sq.m.)	£4800 (£4000+VAT)	Written and meeting
PREAPP 6	Large major development (25 to 149 units / 2,000 - 4,999 sq.m.)	£9000 (£7,500+VAT)	Written and meeting
PREAPP 7	Strategic development* (150 units + / 5,000 sq.m. +)	£12,000 (£10,000+VAT)	Written and meeting
PREAPP 8	Reserved matters	£1800 (£1,500+VAT)	Written and meeting

have free application so would not be negatively affected. Disabled residents (e.g. if trying to make home more accessible) would not be affected.

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

Providing pre-application advice is a non-statutory function but is seen as an essential part of the planning service. As this would mainly affect commercial operators (rather than domestic residents) it would be built in to their calculations on scheme costs.

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

No. This charge is not envisaged to affect smaller schemes (e.g. extensions to homes / small businesses). The additional charges for specialist advice would primarily be levied for larger development proposals submitted by developers and larger commercial operators and these would be factored into their calculations of scheme costs.

4. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age		X	
Sex		X	
Race		X	
Disability		X	
Sexual orientation		X	
Gender reassignment		X	
Religion or belief		X	
Pregnancy or maternity		X	
Marriage		X	

5. Please complete **each row** of the checklist with an "X".

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council's public sector equality duty?		X
Does the policy or proposal relate to an area with known inequalities?		X
Would the policy or proposal change or remove services used by vulnerable groups of people?		X
Has the potential for negative or positive equality impacts been identified with this policy or proposal?		X
If you have answered YES to ANY of the above, then proceed to section B. If you have answered NO to ALL of the above, then proceed straight to section D.		

SECTION B – IMPACTS ANALYSIS

1. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

2. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

AGE	
Details of impacts identified	
DISABILITY	
Details of impacts identified	
RACE	
Details of impacts identified	
SEX	
Details of impacts identified	
SEXUAL ORIENTATION	
Details of impacts identified	

PREGANCY AND MATERNITY	
Details of impacts identified	
RELIGION OR BELIEF	
Details of impacts identified	
GENDER REASSIGNMENT	
Details of impacts identified	
MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	

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

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

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

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

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

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

SECTION D – RESULT

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

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	David Glover
REVIEWING OFFICER:	
HEAD OF SERVICE:	Gerry Ansell

To develop a commercial training arm that can utilise the apprenticeship levy to deliver Apprenticeship Standards. (2021-23 R&E 009)

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	To develop a commercial training arm that can utilise the apprenticeships levy to deliver Apprenticeships Standards.
DEPARTMENT:	Regeneration
TEAM:	Employment, Skills and Enterprise
LEAD OFFICER:	Joanne Thomas
DATE:	25/11/12

SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

To develop a commercial Apprenticeship training arm that can utilise the apprenticeship levy to deliver accredited Apprenticeships Standards. This will generate an income and will also give us the ability to directly design and deliver the content of the 'off the job' training which the apprentices will receive. This gives us the opportunity to ensure the training reflects the role and will ensure equality opportunities are fully embraced.

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

By delivering Apprenticeship training in house, this gives us greater flexibility to ensure our residents who have protected characteristics can undertake an apprenticeship in a considered and inclusive setting.

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

By increasing the scope of our service as a Council to become an Apprenticeship training provider, this will also help improve equality of opportunity, the quality of Apprenticeships and will also raise professional standards.

4. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age		X	
Sex		X	
Race		X	
Disability		X	
Sexual orientation		X	
Gender reassignment		X	
Religion or belief		X	
Pregnancy or maternity		X	
Marriage		X	

5. Please complete **each row** of the checklist with an "X".

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council's public sector equality duty?		x
Does the policy or proposal relate to an area with known inequalities?		x
Would the policy or proposal change or remove services used by vulnerable groups of people?		x
Has the potential for negative or positive equality impacts been identified with this policy or proposal?		x
If you have answered YES to ANY of the above, then proceed to section B.		

If you have answered NO to ALL of the above, then proceed straight to section D.

SECTION B – IMPACTS ANALYSIS

1. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

2. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

AGE	
Details of impacts identified	
DISABILITY	
Details of impacts identified	
RACE	
Details of impacts identified	
SEX	
Details of impacts identified	
SEXUAL ORIENTATION	

Details of impacts identified	
PREGANCY AND MATERNITY	
Details of impacts identified	
RELIGION OR BELIEF	
Details of impacts identified	
GENDER REASSIGNMENT	
Details of impacts identified	
MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	

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

No

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

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

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

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

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

SECTION D – RESULT

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

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date
To ensure engagement activities are fully inclusive for residents with protected characteristics	Increase reach of engagement particularly in areas with known lower participation of residents with protected characteristics	Tristan Cropley	Ongoing

SECTION F – SIGN OFF

OFFICER:	Joanne Thomas
REVIEWING OFFICER:	
HEAD OF SERVICE:	Matthew Dibben

FM contract extension (2021-23 R&E 011)

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	x
DEPARTMENT:	Apleona Security Service
TEAM:	Apleona Brent FM
LEAD OFFICER:	x
DATE:	2020

SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

Outsourced service provision. Apleona HSG, manned guarding restructure and automated access control for retained estates.

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

Current services providers Eurotech (outsourced). Retained estates will receive the same level of security service with a move to a remote system to improve service and reduce carbon foot print through reduced uses of fossil fuel vehicles.

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

No,

4. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age		x	
Sex		x	
Race		x	
Disability		x	
Sexual orientation		x	
Gender reassignment		x	
Religion or belief		x	
Pregnancy or maternity		x	
Marriage		x	

5. Please complete **each row** of the checklist with an "X".

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council's public sector equality duty?		x
Does the policy or proposal relate to an area with known inequalities?		x
Would the policy or proposal change or remove services used by vulnerable groups of people?		x
Has the potential for negative or positive equality impacts been identified with this policy or proposal?		x
If you have answered YES to ANY of the above, then proceed to section B. If you have answered NO to ALL of the above, then proceed straight to section D.		

SECTION B – IMPACTS ANALYSIS

1. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

The service provision will gain automated access control through existing systems located in the Brent Security Control room. Reduced use of vehicle and associated performance of traffic dependant service delivery.

2. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

AGE	
Details of impacts identified	None
DISABILITY	
Details of impacts identified	None
RACE	
Details of impacts identified	None
SEX	
Details of impacts identified	None
SEXUAL ORIENTATION	
Details of impacts identified	None

PREGANCY AND MATERNITY	
Details of impacts identified	None
RELIGION OR BELIEF	
Details of impacts identified	None
GENDER REASSIGNMENT	
Details of impacts identified	None
MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	None

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

No

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

No

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

A projection on mile travelled per year in accordance with service provision would measure a reduced environmental impact.

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

None recorded.

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

N/A

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

Innovation by removing current use of physical security and associated transport, reduced costs and improved service with cost savings during modernisation of existing service.

SECTION D – RESULT

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

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date

SECTION F – SIGN OFF

OFFICER:	
REVIEWING OFFICER:	
HEAD OF SERVICE:	

Customer & Digital Services

ICT Client & Applications income generation from sale of IT support services (2021-23 CDS 001 & 002)

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	2021-23 CDS 001/2 ICT Client and Application support - Income generation
DEPARTMENT:	<u>Customer & Digital Services</u>
TEAM:	ICT Client & Applications Support
LEAD OFFICER:	Sally Chin
DATE:	22 nd November 2019

SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

Increase income from external organisations who receive an IT support service from Brent ICT Client and Applications

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

External Organisations

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

No – proposal is directed at external organisations – providing a quality IT service which will provide good value for money

4. Please indicate with an “X” the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age		X	
Sex		X	
Race		X	
Disability		X	
Sexual orientation		X	
Gender reassignment		X	
Religion or belief		X	
Pregnancy or maternity		X	
Marriage		X	

5. Please complete **each row** of the checklist with an “X”.

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council’s public sector equality duty?		X
Does the policy or proposal relate to an area with known inequalities?		X
Would the policy or proposal change or remove services used by vulnerable groups of people?		X
Has the potential for negative or positive equality impacts been identified with this policy or proposal?		X
If you have answered YES to ANY of the above, then proceed to section B.		
If you have answered NO to ALL of the above, then proceed straight to section D.		

SECTION B – IMPACTS ANALYSIS

1. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

2. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

AGE	
Details of impacts identified	
DISABILITY	
Details of impacts identified	
RACE	
Details of impacts identified	
SEX	
Details of impacts identified	
SEXUAL ORIENTATION	
Details of impacts identified	
PREGANCY AND MATERNITY	

Details of impacts identified	
RELIGION OR BELIEF	
Details of impacts identified	
GENDER REASSIGNMENT	
Details of impacts identified	
MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	

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

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

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

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

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

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

SECTION D – RESULT

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

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date

SECTION F – SIGN OFF

OFFICER:	Sally Chin
REVIEWING OFFICER:	
HEAD OF SERVICE:	Sally Chin

ICT Client & Applications reduction in support services (2021-23 CDS 003 & 005)

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	2021-23 CDS 003/5 ICT Client and Application support – Printing Costs & Oracle changes budget
DEPARTMENT:	Customer & Digital Services
TEAM:	ICT Client & Applications Support
LEAD OFFICER:	Sally Chin
DATE:	22 nd November 2019

SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

Decrease expenditure on printing and changes to the Oracle system

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

Staff within the Council

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

No – proposal is directed at areas of expenditure where there is scope to reduce usage without any impact on people.

4. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age		X	
Sex		X	
Race		X	
Disability		X	
Sexual orientation		X	
Gender reassignment		X	
Religion or belief		X	
Pregnancy or maternity		X	
Marriage		X	

5. Please complete **each row** of the checklist with an "X".

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council's public sector equality duty?		X
Does the policy or proposal relate to an area with known inequalities?		X
Would the policy or proposal change or remove services used by vulnerable groups of people?		X
Has the potential for negative or positive equality impacts been identified with this policy or proposal?		X
If you have answered YES to ANY of the above, then proceed to section B. If you have answered NO to ALL of the above, then proceed straight to section D.		

SECTION B – IMPACTS ANALYSIS

1. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

2. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

AGE	
Details of impacts identified	
DISABILITY	
Details of impacts identified	
RACE	
Details of impacts identified	
SEX	
Details of impacts identified	
SEXUAL ORIENTATION	
Details of impacts identified	
PREGANCY AND MATERNITY	
Details of impacts identified	
RELIGION OR BELIEF	

Details of impacts identified	
GENDER REASSIGNMENT	
Details of impacts identified	
MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	

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

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

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

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

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

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

SECTION D – RESULT

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

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date

SECTION F – SIGN OFF

OFFICER:	Sally Chin

REVIEWING OFFICER:	
HEAD OF SERVICE:	Sally Chin

ICT Client & Applications staffing efficiencies (2021-23 CDS 004)

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	2021-23 CDS 004 ICT Client and Application support – Salaries
DEPARTMENT:	Customer & Digital Services
TEAM:	ICT Client & Applications Support
LEAD OFFICER:	Sally Chin
DATE:	22 nd November 2019

SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

Review structure

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

Staff

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

Yes – as staff may be impacted

4. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age		X	
Sex		X	
Race		X	
Disability		X	

Sexual orientation		X	
Gender reassignment		X	
Religion or belief		X	
Pregnancy or maternity		X	
Marriage		X	

5. Please complete **each row** of the checklist with an “X”.

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council’s public sector equality duty?	X	
Does the policy or proposal relate to an area with known inequalities?		X
Would the policy or proposal change or remove services used by vulnerable groups of people?		X
Has the potential for negative or positive equality impacts been identified with this policy or proposal?		X
If you have answered YES to ANY of the above, then proceed to section B. If you have answered NO to ALL of the above, then proceed straight to section D.		

SECTION B – IMPACTS ANALYSIS

1. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

As the proposal is to potentially restructure some staff may be displaced.

2. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

AGE	
Details of impacts identified	Potential staff displacement

DISABILITY	
Details of impacts identified	Potential staff displacement
RACE	
Details of impacts identified	Potential staff displacement
SEX	
Details of impacts identified	Potential staff displacement
SEXUAL ORIENTATION	
Details of impacts identified	Potential staff displacement
PREGANCY AND MATERNITY	
Details of impacts identified	Potential staff displacement
RELIGION OR BELIEF	
Details of impacts identified	Potential staff displacement
GENDER REASSIGNMENT	
Details of impacts identified	Potential staff displacement

MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	Potential staff displacement

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

No

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

No

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

N/A

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

N/A

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

N/A

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

During the restructure process I will work with HR to ensure that any posts that may be deleted will be based on fair assessments of service need

SECTION D – RESULT

Please select one of the following options. Mark with an “X”.

A	CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED	X
B	JUSTIFY AND CONTINUE THE POLICY/PROPOSAL	
C	CHANGE / ADJUST THE POLICY/PROPOSAL	
D	STOP OR ABANDON THE POLICY/PROPOSAL	

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date

SECTION F – SIGN OFF

OFFICER:	Sally Chin
REVIEWING OFFICER:	
HEAD OF SERVICE:	Sally Chin

Merger of Housing and Corporate Contact Centres (2021-23 CDS 006)

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	Contact Centre Merger
DEPARTMENT:	Brent Customer Access
TEAM:	Contact Centre Operation
LEAD OFFICER:	Asha Vyas

DATE:	29 December 2019

SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

Amalgamation of the housing and corporate contact centre to drive consistency in service delivery and to create a consolidated 'front door' to handle service demands via our telephone and online channels. This initiative is also aimed at delivering operational efficiencies.

The aim of this proposal is to increase efficiency from the current operational arrangement and reflect the Council's long-term Customer Access ambition.

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

The above proposal will impact staff working across both contact centres. Together with key partners including our repair contractors. The extent of this impact is difficult to quantify at this stage. This is because the scope of the proposal is in its infancy stage.

This proposed change will impact on staff within the corporate, housing and Council Tax contact centre. It will also have implication for staff from the wider customer access frontline teams.

No equality impact on residents are anticipated other than improved customer experience. A fresh equality impact assessment once we've firmed up the detail change management plan.

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

Yes, In compliance with the Equality Act 2010 and the Public Sector Equality Duty (PSED), the Council must, in the exercise of its functions, have "due regard" to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not

It is too early to make an informed assessment to determine compliance with the above.

4. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age		X	
Sex		X	
Race		X	
Disability		X	
Sexual orientation		X	
Gender reassignment		X	
Religion or belief		X	
Pregnancy or maternity		X	
Marriage		X	

5. Please complete **each row** of the checklist with an "X".

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council's public sector equality duty?	X	
Does the policy or proposal relate to an area with known inequalities?		X
Would the policy or proposal change or remove services used by vulnerable groups of people?		X
Has the potential for negative or positive equality impacts been identified with this policy or proposal?		X
If you have answered YES to ANY of the above, then proceed to section B. If you have answered NO to ALL of the above, then proceed straight to section D.		

SECTION B – IMPACTS ANALYSIS

1. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

Analysis of call volumes and types has been pulled together across contact centre function. However, this is at an aggregated level and requires further segmentation, to determine customer profile across the range of equality strands.

Segmentation will be done as part of the detailed change management process. We have a comprehensive set of transactional data though this will require detailed analysis.

2. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

AGE	
Details of impacts identified	Not applicable
DISABILITY	
Details of impacts identified	Not applicable
RACE	
Details of impacts identified	Not applicable
SEX	
Details of impacts identified	Not applicable
SEXUAL ORIENTATION	
Details of impacts identified	Not applicable
PREGNANCY AND MATERNITY	
Details of impacts identified	Not applicable
RELIGION OR BELIEF	

Details of impacts identified	Not applicable
GENDER REASSIGNMENT	
Details of impacts identified	Not applicable
MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	Not applicable

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

Not applicable

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

There will be a number of engagement activities carried out to inform the new service design. Consideration will be given to how we might seek the views from users

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

A more detailed analysis of call demands, supplemented by a very detailed segmentation analysis

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

We will carry out a further equality impact assessment once we've work up the detail of the new service design

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

We will develop a suite of management reports to monitor the impact of service post implementation of the new service arrangements

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

The above analysis above has concluded that further work is required to determine the overall impact of the proposed initiative. Our indicative view is that this change will enhance service delivery. We recognise the need to ensure our new service offer caters for the needs of our vulnerable customers. This will be a key feature of the new service design and we'll ensure we established the right management information to assess impacts.

SECTION D – RESULT

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

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date
Develop detailed project plan to set out the key purpose of this initiative, key objectives and expected outcomes for residents and the Council	Clear understanding of the scope of the project, expected benefits and anticipated impact on customers	Asha Vyas	June 2020
Carry out segmentation analysis	To understand customers base and to assess the	Asha Vyas	August 2020

	impact of the changes to staffing level		
Develop a suite of management information to measure the success of the new service including the impact of customers	Understanding of performance post implementation of the change process and a clear measurement of impact on customers	Asha Vyas	October 2020

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Troy Francis
REVIEWING OFFICER:	
HEAD OF SERVICE:	Troy Francis

Reduction in postal costs (2021-23 CDS 007)

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	Reduction in postal costs
DEPARTMENT:	Customer and Digital Services
TEAM:	Post Team
LEAD OFFICER:	Asha Vyas
DATE:	05/12/19

SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

Reduce expenditure on postage through increased use of automation and on line channels for residents

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

No impact – this should be a natural consequence of the implementation of the Digital Strategy which is increasing digital self-service across a range of services and making is easier for residents to transact on line.

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

No. As in point two above, this should be a natural consequence of the implementation of the Digital Strategy which is increasing digital self-service across a range of services and making it easier for residents to transact on line.

4. Please indicate with an “X” the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age		X	
Sex		X	
Race		X	
Disability		X	
Sexual orientation		X	
Gender reassignment		X	
Religion or belief		X	
Pregnancy or maternity		X	
Marriage		X	

5. Please complete **each row** of the checklist with an “X”.

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council’s public sector equality duty?	X	
Does the policy or proposal relate to an area with known inequalities?		X
Would the policy or proposal change or remove services used by vulnerable groups of people?		X
Has the potential for negative or positive equality impacts been identified with this policy or proposal?		X
If you have answered YES to ANY of the above, then proceed to section B. If you have answered NO to ALL of the above, then proceed straight to section D.		

SECTION B – IMPACTS ANALYSIS

1. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

No inequality can be identified from this specifically. There is a wider EA consideration for the Digital Strategy, however.

An equality impact assessment will be carried out to determine the impact of the detailed proposal. The design of new customer access target operating model will include a clear offer for customers from lower socio-economic backgrounds and disabled people.

2. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

AGE	
Details of impacts identified	n/a
DISABILITY	
Details of impacts identified	n/a
RACE	
Details of impacts identified	n/a
SEX	
Details of impacts identified	
SEXUAL ORIENTATION	

Details of impacts identified	n/a
PREGANCY AND MATERNITY	
Details of impacts identified	n/a
RELIGION OR BELIEF	
Details of impacts identified	n/a
GENDER REASSIGNMENT	
Details of impacts identified	n/a
MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	n/a

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

n/a

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

n/a

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

n/a

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

n/a

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

n/a

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

There are no mitigating actions foreseen to be needed as there is no impact to the customer.

SECTION D – RESULT

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

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date
n/a			

SECTION F – SIGN OFF

OFFICER:	Leigh Wood
REVIEWING OFFICER:	Troy Francis
HEAD OF SERVICE:	Asha Vyas

BCS - Savings from new Council Tax Support scheme (2021-23 CDS 008)

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	Savings from new Council Tax Support scheme
DEPARTMENT:	Customer and Digital Services
TEAM:	Benefits
LEAD OFFICER:	Asha Vyas
DATE:	05/12/19

SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

A new Council Tax Support (CTS) scheme is being introduced from April 2020. Although initially this may generate some additional customer demand due to the change from the existing scheme, following this it is expected that the new, simplified scheme will be easier to administer (as well as providing opportunities for greater automation.)

This staff saving will be made during the first year of running the new CTS scheme through natural turnover.

See also Savings proposal 2021-23 CDS 011, in conjunction with this proposal.

It should be noted that the Benefit Service is also reducing other staffing costs (currently met via Reserves) by approximately £200K each year up to 2023/24 in relation to the rollout of Universal Credit.

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

No impact – The reduction in FTEs will be as a natural consequence of a simplified scheme.

A communications plan is being developed and will include specific messaging to vulnerable groups.

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

No - as in point two above.

4. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age		X	
Sex		X	
Race		X	
Disability		X	
Sexual orientation		X	
Gender reassignment		X	
Religion or belief		X	
Pregnancy or maternity		X	
Marriage		X	

5. Please complete **each row** of the checklist with an "X".

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council's public sector equality duty?	X	
Does the policy or proposal relate to an area with known inequalities?		X
Would the policy or proposal change or remove services used by vulnerable groups of people?		X
Has the potential for negative or positive equality impacts been identified with this policy or proposal?		X
If you have answered YES to ANY of the above, then proceed to section B. If you have answered NO to ALL of the above, then proceed straight to section D.		

SECTION B – IMPACTS ANALYSIS

1. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

No inequality can be identified from this specifically. There is a wider EA consideration for the Council Tax Support scheme, however. This has now been agreed at Full Council.

2. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

AGE	
Details of impacts identified	n/a
DISABILITY	
Details of impacts identified	n/a
RACE	
Details of impacts identified	n/a
SEX	
Details of impacts identified	
SEXUAL ORIENTATION	
Details of impacts identified	n/a

PREGANCY AND MATERNITY	
Details of impacts identified	n/a
RELIGION OR BELIEF	
Details of impacts identified	n/a
GENDER REASSIGNMENT	
Details of impacts identified	n/a
MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	n/a

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

n/a

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

n/a

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

n/a

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

n/a

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

n/a

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

There are no mitigating actions foreseen to be needed as there is no impact to the customer.

SECTION D – RESULT

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

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date
n/a			

SECTION F – SIGN OFF

OFFICER:	Leigh Wood
REVIEWING OFFICER:	Troy Francis
HEAD OF SERVICE:	Asha Vyas

Increased automation (2021-23 CDS 009)

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	Increased automation
DEPARTMENT:	Customer and Digital Services
TEAM:	Benefits
LEAD OFFICER:	Asha Vyas
DATE:	05/12/19

SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

Implementation of increased automation through Robotic processing, Northgate modules and Customer Relationship Management (CRM) system.

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

Automation should have a positive impact for residents as it will increase processing efficiency, accuracy and consistency of decisions. However, we recognise that appropriate checks will need to be put in place to ensure the integrity of data handling by the robotic solution.

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

Yes, In compliance with the Equality Act 2010 and the Public Sector Equality Duty (PSED), the Council must, in the exercise of its functions, have "due regard" to the need to:

4. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.

5. Advance equality of opportunity between people who share a protected characteristic and those who do not.
6. Foster good relations between people who share a protected characteristic and those who do not

It is too early to make an informed assessment to determine compliance with the above

4. Please indicate with an “X” the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age		X	
Sex		X	
Race		X	
Disability		X	
Sexual orientation		X	
Gender reassignment		X	
Religion or belief		X	
Pregnancy or maternity		X	
Marriage		X	

5. Please complete **each row** of the checklist with an “X”.

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council’s public sector equality duty?	X	
Does the policy or proposal relate to an area with known inequalities?		X
Would the policy or proposal change or remove services used by vulnerable groups of people?		X
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	X	
If you have answered YES to ANY of the above, then proceed to section B. If you have answered NO to ALL of the above, then proceed straight to section D.		

SECTION B – IMPACTS ANALYSIS

1. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

There already a number of automation solution in operation within the department. We know from experience the need to ensure the right system logic, coupled with good quality data is required. This will enable consistency and minimise the risk of adversely affecting customers from particular groups. There is no anticipated adverse risk to any of the protected groups. Though further work will be done as part of the detailed proposal to assess the same.

2. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

AGE	
Details of impacts identified	n/a
DISABILITY	
Details of impacts identified	n/a
RACE	
Details of impacts identified	n/a
SEX	
Details of impacts identified	
SEXUAL ORIENTATION	

Details of impacts identified	n/a
PREGANCY AND MATERNITY	
Details of impacts identified	n/a
RELIGION OR BELIEF	
Details of impacts identified	n/a
GENDER REASSIGNMENT	
Details of impacts identified	n/a
MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	n/a

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

n/a

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

n/a

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

n/a

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

n/a

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

n/a

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

There are no mitigating actions foreseen to be needed as there is no impact to the customer.

SECTION D – RESULT

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

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date
n/a			

SECTION F – SIGN OFF

OFFICER:	
REVIEWING OFFICER:	
HEAD OF SERVICE:	

Replace online benefits form with a more agile solution to improve customer experience (2021-23 CDS 010)

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	Replace IEG4 online benefits forms
DEPARTMENT:	Customer and Digital Services
TEAM:	Benefits
LEAD OFFICER:	Asha Vyas
DATE:	05/12/19

SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

The Benefits Service currently utilises an electronic claim form (IEG4) for claimants to make initial claims and report changes in circumstances – and has done successfully for several years. An EIA was carried out for online claiming several years ago. This is not a new initiative, rather looking for a more cost effective solution. This is used in conjunction with Risk Based Verification (RBV) software which risk-scores each claim / change, thereby dictating how much evidence is required from the claimant to support their claim. Over the next couple of years, there will be less need to utilise this relatively expensive approach, because: -

- The continued rollout of Universal Credit (UC) will result in a significant reduction in the number of claims and changes in circumstances for Housing Benefit (HB)
- A new Council Tax Support (CTS) scheme is being introduced from April 2020, utilising a significantly simpler claim process, less need for evidence verification from claimants (as more information from DWP and HMRC will be utilised), and indeed less need or benefit to be gained from differentiating claims on a risk basis (as many of the “higher risk” claims will have migrated from HB to UC).

As a result, it will be possible to move from IEG to a simpler and cheaper alternative e-claim (whether from a third party or internally developed in MS Dynamics). It will also be possible to move away from RBV or introduce a simpler and cheaper variation of this. Furthermore, the simplified CTS scheme has the potential for robotic automation to transfer data from the e-claim directly into the Council Tax system.

Savings will be deliverable by 2022/23 and achieved through cheaper alternative systems (or completely stopping use of RBV), plus 1FTE staffing saving from the potential robotic process.

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

There is not expected to be any impact on service users due to these changes; in fact, the benefits claim process and administration is expected to be improved via these proposals. Customer service is expected to be improved as a result.

3. Is there relevance to equality and the council’s public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

No - as in point two above.

4. Please indicate with an “X” the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age		X	
Sex		X	
Race		X	
Disability		X	
Sexual orientation		X	
Gender reassignment		X	

Religion or belief		X	
Pregnancy or maternity		X	
Marriage		X	

5. Please complete **each row** of the checklist with an “X”.

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council’s public sector equality duty?	X	
Does the policy or proposal relate to an area with known inequalities?		X
Would the policy or proposal change or remove services used by vulnerable groups of people?		X
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	X	
If you have answered YES to ANY of the above, then proceed to section B. If you have answered NO to ALL of the above, then proceed straight to section D.		

SECTION B – IMPACTS ANALYSIS

1. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

The IEG solution determines help determines claimant’s eligibility and entitlement to housing and Council tax support benefits. Data from established management reports have provided a view of the key risk indicators to bear in mind as part of the transition to an alternative solution. The key risk indicators will potentially include a few indicators relating to equalities and processes.

2. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

AGE

Details of impacts identified	n/a
DISABILITY	
Details of impacts identified	n/a
RACE	
Details of impacts identified	n/a
SEX	
Details of impacts identified	
SEXUAL ORIENTATION	
Details of impacts identified	n/a
PREGANCY AND MATERNITY	
Details of impacts identified	n/a
RELIGION OR BELIEF	
Details of impacts identified	n/a
GENDER REASSIGNMENT	

Details of impacts identified	n/a
MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	n/a

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

n/a

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

n/a

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

n/a

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

n/a

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

n/a

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

There are no mitigating actions foreseen to be needed as there is no impact to the customer. However, should the project be taken forward an EIA will be carried out accordingly.

SECTION D – RESULT

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

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date
n/a			

SECTION F – SIGN OFF

OFFICER:	Leigh Wood
REVIEWING OFFICER:	Troy Francis
HEAD OF SERVICE:	Asha Vyas

BCS - Staffing efficiencies (2021-23 CDS 011)

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	Staff efficiencies
DEPARTMENT:	Customer Access
TEAM:	Benefit assessment
LEAD OFFICER:	Troy Francis
DATE:	4 December 2019

SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

Deliver staff efficiencies through undertaking various change management initiatives, aimed at the council tax support function and natural turnover. Savings will be spread across 2021/22 and 2022/23.

Staff working across our customer access operations (customer facing and back offices) would be affected.

It should be noted that the Benefits Service is also reducing other staffing costs by approximately £200k each year up to 2023/24 in relation to the rollout of Universal Credit. This is part of wider operational resource management strategy imposed us as part of the Universal Credit implementation. This commitment is set out within the departmental service plan.

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

There is not expected to be any impact on service users due to these staffing reductions, as they are all expected to be accomplished via streamlined or simplified processes (Council Tax / Benefits) or new systems (ASH). Customer service is expected to be improved as a result.

Any changes arising from this proposal will be communicated through local specific communication and engagement plan.

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

Yes, In compliance with the Equality Act 2010 and the Public Sector Equality Duty (PSED), the Council must, in the exercise of its functions, have "due regard" to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not

3. Please indicate with an “X” the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age		X	
Sex		X	
Race		X	
Disability		X	
Sexual orientation		X	
Gender reassignment		X	
Religion or belief		X	
Pregnancy or maternity		X	
Marriage		X	

4. Please complete **each row** of the checklist with an “X”.

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council’s public sector equality duty?	X	
Does the policy or proposal relate to an area with known inequalities?		X
Would the policy or proposal change or remove services used by vulnerable groups of people?		X
Has the potential for negative or positive equality impacts been identified with this policy or proposal?		X
If you have answered YES to ANY of the above, then proceed to section B. If you have answered NO to ALL of the above, then proceed straight to section D.		

SECTION B – IMPACTS ANALYSIS

1. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

There are various pieces of analysis carried out to determine operational and customer demands. This has some provided some crude baselines to inform a range of indicative assumptions. A demand forecasting analysis exercise is underway. The outcome of this piece of work will provide clarity on the Council's future channel strategy and resource model for frontline services. We'll also consider the use of new technology to handle some of our simple high volume activities.

A further impact assessment will be carried out to assess any impact on vulnerable residents.

2. For each "protected characteristic" provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state "not applicable".

AGE	
Details of impacts identified	Not applicable
DISABILITY	
Details of impacts identified	Not applicable
RACE	
Details of impacts identified	Not applicable
SEX	
Details of impacts identified	Not applicable
SEXUAL ORIENTATION	

Details of impacts identified	Not applicable
PREGANCY AND MATERNITY	
Details of impacts identified	Not applicable
RELIGION OR BELIEF	
Details of impacts identified	Not applicable
GENDER REASSIGNMENT	
Details of impacts identified	Not applicable
MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	Not applicable

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

Not applicable

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

No applicable

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

A more detailed analysis of call demand, together with a very detailed segmentation analysis

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

We will carry out a further equality impact assessment once we've work up the detail of the new service design

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

We will develop a suite of management reports to monitor the impact of service post implementation of the new service arrangements.

A fresh equality impact assessment will be carried out once we've got a detailed change plan. Having said that we're not anticipating any adverse impact on any of the protected characteristic.

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

The above analysis has concluded that further work is required to determine the overall impact of the proposed initiative to generate efficiencies in staffing levels. Our indicative view is that this change will enhance service delivery.

We recognise the need to ensure that above changes does not adversely affect any particular customer group. This will be a key feature of any changes to resource levels and we'll ensure we established the right management information to assess impacts.

SECTION D – RESULT

Please select one of the following options. Mark with an "X".

A	CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED	X
B	JUSTIFY AND CONTINUE THE POLICY/PROPOSAL	
C	CHANGE / ADJUST THE POLICY/PROPOSAL	

D	STOP OR ABANDON THE POLICY/PROPOSAL	

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date
Carry out segmentation analysis. There is a data demand analysis currently underway which will complement our current data sets. We're also intending to carry out a programme of customer journey mapping.	To understand customers base and to assess the impact of the changes to staffing level	Asha Vyas	August 2020
Develop detailed project plan to set out the key purpose of this initiative, key objectives and expected outcomes for residents and the Council	Clear understanding of the scope of the project, expected benefits and anticipated impact on customers	Asha Vyas	June 2020
Develop a suite of management information to measure the success of the new service including the impact of customers. The management information referred to here will also include data to assess any equality impacts.	Understanding of performance post implementation of the change process and a clear measurement of impact on customers	Asha Vya	October 2020

SECTION F – SIGN OFF

OFFICER:	Troy Francis
REVIEWING OFFICER:	
DIRECTOR OF CUSTOMER	Troy Francis

Transformation staffing efficiencies (2021-23 CDS 012)

Reference:	2021-23 CDS 012
Service(s):	Transformation
Lead Member(s):	Margaret McLennan

Savings Proposals:	Transformation staffing efficiencies

Financial and Staffing Information

2019/20	
Total budget for the service(s) £'000:	£3M
Total post numbers in the services(s) (FTE):	53

	2021/22	2022/23
	£'000	£'000
Proposed saving:		100
	FTE	FTE
Proposed staffing reduction		1

Proposed savings

Reduction of one management post as part of re-alignment of team structure following merger of Transformation, BCS service improvement, web and business intelligence functions. The current structure has 6 posts at this level.

How would this affect users of this service?

No impact. Work would be redistributed across the team.

Key milestones

N/A

Key consultations

Consultation with affected staff on any structural changes.

Key risks and mitigations

Risk of impact to delivery of transformation work programme will be mitigated by gradual implementation of changes and re-alignment of work between other managers in the team.

Equality impact screening

The proposal would not have an adverse impact on any of the protected characteristics as outlined in the Equality Act 2010.

Is there potential for the proposed saving to have a disproportionate adverse impact on any of the following groups:	
Disabled people	No
Particular ethnic groups	No
Men or Women (include impacts due to pregnancy/maternity)	No
People of particular sexual orientation/s	No
People who are proposing to undergo, are undergoing or have undergone a process or part of a process of gender reassignment	No
People in particular age groups	No
Groups with particular faiths/beliefs	No
Marriage / civil partnership	No

If the screening has identified a potentially disproportionate adverse impact, you will need to complete an Equality Impact Assessment.

EIA required?:	No
EIA to be completed by:	
Deadline:	

Lead officer for this proposal:	Sadie East

Chief Executive's Department

Efficiency savings proposals (2021-23 CE 001/2/3)

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	Efficiency savings within the Chief Executive's Departments
DEPARTMENT:	Chief Executive's Departments – (i) Finance, (ii) Legal, Human Resources, Audit and Investigations (iii) Assistant Chief Executive
TEAM:	
LEAD OFFICER:	Minesh Patel, Director of Finance. Debra Norman, Director of Legal, HR, Audit & Investigations. Shazia Hussain, Assistant Chief Executive.
DATE:	4 December 2019

SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

LHRA&I proposals:

Reduce external Internal Audit through re-procurement and utilise finance resource through rotations. This will reduce overall available internal audit hours.

1. Full cost recovery from external.
2. Restructure of vacant posts in a legal team.
3. Rationalise OH checks on recruitment.
4. Re-procurement of Legal Library provider

Finance proposals:

5. Centralise management of all the council's energy spend drive procurement savings.
6. Rationalise, reduce and consolidate the use of document storage across the council via destruction and use of technology. This would be a spend to save project.

ACE proposals:

7. It is proposed to review the structure of the admin support across the council and centralise core elements within the Executive & Member Services function in 2021/22 which will result in efficiencies.
8. Restructure of Conference and Events to remodel the service with a view to generating more income, c£200k. This will mainly cover the historic communications income target gap and the £100k saving required for 2020/21.

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

Minimal impact on users of the service as the proposals focus primarily on efficiency savings and income generation.

Proposals within ACE will involve staffing restructures, which will be managed through the Managing Change policy.

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

It is not expected that the proposals will have relevance to equality and the council's public sector equality duty. This is because the proposals focus primarily on efficiency savings and income generation. The proposals that involve staffing restructures will be managed through the Managing Change policy.

4. Please indicate with an “X” the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age		X	
Sex		X	
Race		X	
Disability		X	
Sexual orientation		X	
Gender reassignment		X	
Religion or belief		X	
Pregnancy or maternity		X	
Marriage		X	

5. Please complete **each row** of the checklist with an “X”.

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council’s public sector equality duty?		X
Does the policy or proposal relate to an area with known inequalities?		X
Would the policy or proposal change or remove services used by vulnerable groups of people?		X
Has the potential for negative or positive equality impacts been identified with this policy or proposal?		X
If you have answered YES to ANY of the above, then proceed to section B. If you have answered NO to ALL of the above, then proceed straight to section D.		

SECTION B – IMPACTS ANALYSIS

1. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

2. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

AGE	
Details of impacts identified	
DISABILITY	
Details of impacts identified	
RACE	
Details of impacts identified	
SEX	
Details of impacts identified	
SEXUAL ORIENTATION	
Details of impacts identified	
PREGANCY AND MATERNITY	
Details of impacts identified	
RELIGION OR BELIEF	

Details of impacts identified	
GENDER REASSIGNMENT	
Details of impacts identified	
MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	

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

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

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

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

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

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

SECTION D – RESULT

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

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Ravinder Jassar, Head of Finance
REVIEWING OFFICER:	Minesh Patel, Director of Finance
HEAD OF SERVICE:	Minesh Patel, Director of Finance. Debra Norman, Director of Legal, HR, Audit & Investigations.

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London Borough of Brent

**Appendix D - Report of the Budget Scrutiny
Task Group**

By Cllr Matt Kelcher, Chair

January 2020

Contents

1.	Introduction	3
	<i>a) Purpose</i>	<i>3</i>
	<i>b) Method</i>	<i>3</i>
	<i>c) Membership of the Scrutiny Task Group</i>	<i>4</i>
	<i>d) Legal statement</i>	<i>4</i>
2.	Half Way There	5
	<i>a) Context</i>	<i>5</i>
	<i>b) Council Tax collection</i>	<i>7</i>
	<i>c) Over/underspends</i>	<i>8</i>
	<i>d) Accountability</i>	<i>10</i>
	<i>e) The public health grant</i>	<i>11</i>
	<i>f) Capital spending</i>	<i>12</i>
	<i>g) Business rates</i>	<i>13</i>
3.	Departmental Savings	15
	<i>a) Children and young people</i>	<i>15</i>
	<i>b) Environment</i>	<i>16</i>
	<i>c) Adult social care</i>	<i>18</i>
4.	Conclusion	20
5.	Recommendations	21

1. Introduction

a) Purpose

For readers new to the budget scrutiny process in Brent, it is important to note at the outset what the purpose, scope and limits of this report are.

What this report does	What this report does not do
Starts a conversation about the plans for Brent's 2020-21 budget and highlights some key talking points that members may wish to examine further as the full budget setting process is followed	Cover every possible contention, thought or recommendation that backbench councillors in Brent may wish to raise before the budget is passed by full council
Provides a paper to be analysed by the wider Resources and Public Realm Scrutiny Committee at its January 2020 meeting, and suggests some early recommendations for this committee	Represent the final or unalterable word of Brent's two scrutiny committees and all of the councillors involved in scrutiny
Summarises some of the key political debates which must be considered by anyone engaging with Brent's budget setting process	Provide a line-by-line analysis of the borough's proposed budget, re-check every calculation or stray into the territory more appropriate for the audit committee
Uses information which is in the public domain and open to any local resident who wishes to look at these issues in more detail	Contain secret information or makes conclusions based on confidential or privileged information

b) Method

This year, an early general election was called in the middle of the budget scrutiny process. This presented a challenge that budget scrutiny has never before faced when conducting its investigations and writing its final report. Due to purdah restrictions, and the desire of councillors to be on the doorstep rather than in the civic centre, some of our meetings had to be curtailed, rescheduled or combined. However, we still feel confident that we were able to scrutinise the budget and ask important questions about the proposals the cabinet has come forward with.

c) Membership of the Scrutiny Task Group

As ever, this budget scrutiny panel was a joint effort between the borough's two permanent scrutiny committees – with equal representation from the Community and Wellbeing Committee and the Resources and Public Realm Committee. Cllr Kelcher, as chair of the Resources Committee, acted as overall chair of the budget scrutiny panel.

The full panel was comprised as follows.



**Cllr Matt Kelcher
(Chair)**

*Chair of the Resources
and Public Realm
Scrutiny Committee*



Cllr Neil Nerva

*Member of the
Resources and Public
Realm Scrutiny
Committee*



Cllr Ketan Sheth

*Chair of the Community
and Wellbeing Scrutiny
Committee*



Cllr Anita Thakkar

*Member of the
Community and
Wellbeing Scrutiny
Committee*

d) Legal statement

Local authorities have a legal duty to set a balanced budget. We are happy to confirm that we believe that this budget meets this test.

We would also like to commend the council's team overall for the prudent, if tough, financial decisions it has taken in recent years which ensure that Brent is able to achieve a balanced budget, despite facing huge cuts from central government.

We are pleased there is no immediate prospect of the council falling into the kind of deep financial difficulties we have seen in places such as Northamptonshire County Council.

2. Half way there

a) Context

When examining the proposed 2020/21 budget it is important to remember that we are at the halfway stage of a process. In February 2019, Brent passed a comprehensive two-year budget to cover the period from 2019 to 2021. As part of this budget setting process an in-depth scrutiny review of every proposed saving was carried out. Some parts of this budget have now changed, and new savings and plans have been worked into the budget framework. So, overall, there are necessarily fewer savings proposals to be considered at this stage of the process, but more out-turn reports to review.

Scrutiny has endorsed Brent's two-year budget setting in previous reports. There is so little certainty in the world of local government finance, that any step a borough can take to allow its officers and members to plan in a slightly longer-term manner must be taken.

Adding to the whirl of uncertainty at the time this review was carried out, was the December 2019 general election. Before the election was called, central government was committed to a thorough review of the revenue support grant – the main source of income for councils like ours. We anticipate that this review will still take place, and that its outcome will not be beneficial to Brent.

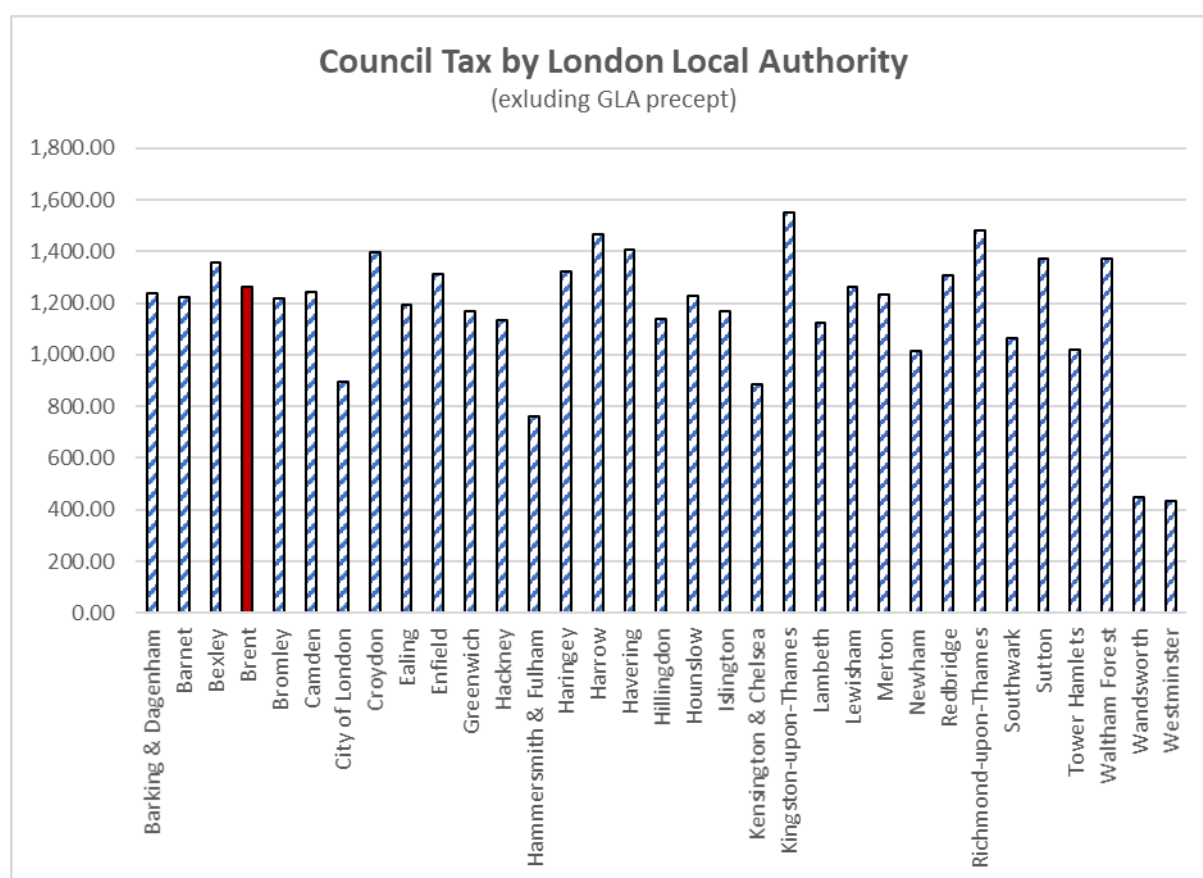
This is for two main reasons:

1. The government have stated that they are looking to add consideration of the distances that people must travel to access council services into the funding formula. This is likely to distribute money away from inner city boroughs and into shire counties, disadvantaging Brent.
2. The government have also made it clear that they think money should be shared more evenly on a head of population basis, with the deprivation of areas given less consideration than now. Again, this could lead to a distribution of money away from a place like Brent, which despite the best efforts of the council, continues to have economic difficulties and is less affluent than many other boroughs in London and across England.

Therefore, it is very likely that when we look at the budget again next year, the financial position of Brent may have become even more precarious.

We appreciated that the cabinet's recommendation to raise council tax by 3.99 per cent as part of the budget was influenced by this political context.

In the previous few years, the budget scrutiny panel has invariably supported proposals to raise council tax by the maximum amount allowed in law. Quite simply we felt there was no alternative to this if we wanted to set a balanced budget as the revenue support grant is pulled away from authorities like ours. We were also satisfied that Brent was raising its level of council tax from a relatively low base and even with the recent year-on-year increases was nowhere near the most expensive place to pay council tax in London, as shown below.



In addition, we have seen clear evidence that the council is committed to helping the most vulnerable to manage the burden that council tax can impose. Last year's budget contained a provision to make a saving through a revised council tax support scheme. When it became apparent that such savings could not be made without harming the most vulnerable, we were pleased to see that Brent went back to the drawing board and drew up a new scheme, even though this would not save money overall.

This new plan came to the Resources and Public Realm Scrutiny Committee for pre-scrutiny where the overall approach was endorsed.

Despite all of this, we know that council tax overall is a regressive tax, and it is regrettable that local government as a whole has been put in a position where almost every council feels it has no choice but to raise council tax by the maximum permitted amount.

b) Council Tax collection

The collection rate for council tax measures both as an in-year collection rate and an overall rate, which takes into account the fact that charges raised are sometimes not paid on time but the council pursues them until they are paid or become uncollectable.

The table below shows the collection rates, both in-year and overall, for the last three years as a percentage of total charges due. Please note that collection for these years will continue and so the cumulative position is expected to increase.

	2016/17	2017/18	2018/19
	%	%	%
In-year collection	95.74	95.80	96.10
Cumulative collection	97.23	96.65	96.50

The target for the lifetime collection rate that is built into financial planning assumptions is 97.63%. This is based on a historical analysis of collection rates. For example, the collection rate for the financial year 2013/14 as at October 2019 was 97.49% and in October 2018 it was 97.44%. If this trend were to continue, it is likely that a collection rate beyond 97.63% could be achieved in two years' time.

This does not mean that collection efforts will stop once the budgeted collection levels have been reached, or that eventual losses will necessarily be 2.37%. It is, however, essential that an adequate non-collection allowance be made each year. The Government recognises that no billing authority can collect every pound of Council Tax and that an element of collection will continue after the relevant year. The legislation provides for an allowance for non-collection to be incorporated into financial planning assumptions.

In an ideal world, we would hope that Brent would have a clear picture of the point at which they would see further rises to be unfair or unaffordable, or perhaps a target to never get

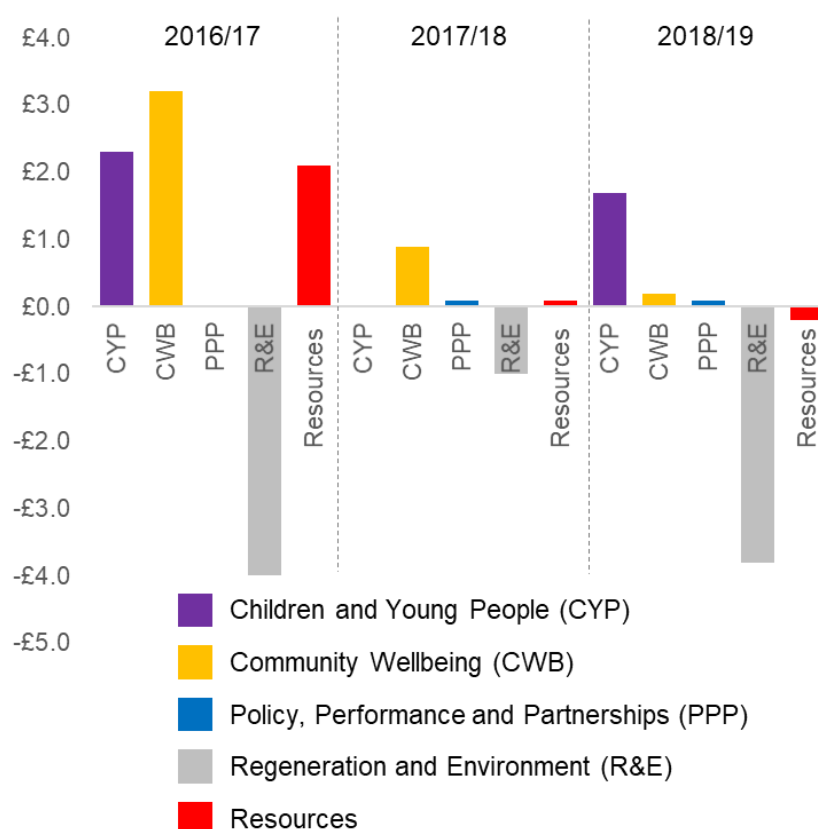
higher than a certain point on the 'league table' of council tax levels amongst the 32 London boroughs. We made these points to the Deputy Leader of the Council at one of our budget scrutiny panel meetings, but accepted her rebuttal that with so much financial uncertainty in local government (for the reasons outlined above) Brent can only take decisions on a year-by-year basis for the time being.

Therefore, we again endorse the plan for a council tax rise for the 2020/21 financial year.

c) Over/underspends

The panel analysed the outturn budget position at the halfway point of the two-year cycle. We questioned any areas of over/underspend that emerged from this. For example, we identified an overspend of £200k from Community Wellbeing, and discovered this arose from work on prevention programmes.

More strategically, the panel identified a recurring problem of certain departments consistently over or under spending on their budgets. The table below summarises the situation.



As readers will clearly be able to see, in two of the last three years the Children and Young People's department (CYP) has significantly overspent, and this over spend has been made up by an even more significant underspend in the Regeneration and Environment Department.

We spent some significant time discussing the drivers of overspend in CYP, and identified the following reasons why accurate budget forecasting in this department is difficult:

- This is a demand-led department with the level of spending determined by what cases the council has to deal with. A handful of additional children or young people with high needs can cost the council hundreds of thousands, or even millions, of pounds.
- It is not just the number of cases that are unpredictable, but also the level of need in each case. Therefore, whilst the overall number of looked after children in Brent is lower than in many similar London boroughs, if just a few of these young people require the most intensive (and therefore expensive) placement care there can be a significant multiplier effect which makes budget setting particularly hard.
- We cannot legally, nor should we ever wish to, turn away any of these people, and so the budget in this department cannot be rigorously stuck to.
- Wider social issues that have an enhanced impact on more deprived London boroughs like Brent drive costs even further. For example, in-house fostering is not only most often the best solution for young people in need, it is also the cheapest option for the council. However, the chronic lack of housing in Brent means that few of our in house foster parents have the spare rooms required, forcing the council to go to more expensive private foster companies.
- Brent is not starting from a high base, as there are currently only five London boroughs with a lower level of funding for children's services.

We also discussed the extra expense that comes when the council is forced to use agency social workers rather than in-house staff. It was reported that in the second half of 2018-2019 the Localities Service took action to reduce the number of agency social workers whilst maintaining the commitment to safe caseloads, however, at times the service had had to run at up to 20 FTE over establishment, with up to a third of case holding staff being agency workers. The full year impact of 20 additional FTE accounted for the majority of a £1.3m overspend. In the second half of 2018-2019 the number of additional agency social workers was reduced to 14 by year end.

The issue of agency workers in this department has been discussed by budget scrutiny many times in recent years and we were pleased to learn that progress has been made to reduce the reliance on agency workers at management level. We hope further progress can be made for all agency staff, particularly as the council looks to build and acquire far more homes in Brent for social rent.

Following these discussions, and analysis of the factors summarised above, we accepted that accurate budgeting in this department will always be tricky. It could also be argued that simply increasing the size of the CYP budget might not create the kind of incentives we would like, for officers to continue to drill down on inefficiency in this department.

Nonetheless given the fact that overspends in this department are regular, and that underspends in other departments to make up the shortfall cannot be guaranteed, we do feel the council's finance team should look again at what each department is likely to spend and aim for a more accurate forecast.

d) Accountability

The discussion around budget outturn also led us to investigate what processes the council follows when it becomes apparent that a proposed policy is not going to deliver the level of saving anticipated within a given financial year.

Obviously, when this occurs a mitigation must be made elsewhere to plug the gap. It was our strong belief that any such decisions could have an impact on services delivered to our residents, and therefore that such decisions should be unequivocally member-led and accountable to the public through their local councillors.

We examined tables used by the finance department to report on quarterly budget results, and found these to be helpful in tracking where shortfalls have occurred.

However, it was not clear that in this process that the final column, on mitigation is always signed off fully by the lead member, ultimately responsible for what happens in their department.

Brent		Cabinet 14 October 2019 Report of the Finance Director
Quarter 2 Financial Report 2019/20		
Wards Affected:	All	
Key or Non-Key Decision:	Key	
Open or Part-Fully Open?	Open	
No. of Appendices:	None	
Background Papers:	None	
Contact Officer(s):	Baroness Patten, Director of Finance 020 8937 4042 Baroness.Patten@brent.gov.uk	
	Baroness Patten, Head of Finance 020 8937 1731 Baroness.Patten@brent.gov.uk	

1. Summary

1.1. This report sets out the current forecasts of income and expenditure against the budget for 2019/20 and other key financial data.

1.2. Overall the Council is expecting to underspend against the main general fund revenue budget by £1.1m. This primarily relates to a net underspend of £1.5m in Regeneration and Environment, partially to several areas of underspend in Environmental services, (as set out in paragraph 3.5.2). Offsetting this is a £0.2m overspend relating to historic care costs within Adult Social Services (as set out in paragraph 3.4.3). There is a further net overspend of £0.5m within Children and Young People (CYP) relating to an overspend in Partnership Planning and Performance and Localities (as set out in paragraph 3.3). All other departments within the General Fund are forecasting to spend to budget.

1.3. The Housing Revenue Account (HRA) is forecast to overspend by £0.5m (as set out in paragraph 3.10.1).

Therefore, we ask the council to change its procedure to ensure that its financial reports clearly state which lead member has signed off on which mitigating steps, and on which date. It is also incumbent upon lead members to bring back any mitigation steps which might change council policy, to the lead group. This happened with the change of plans around council tax support in 2019, a model which should be emulated, most notably around the NAIL project where the anticipating savings have not been realised.

We also recognise that local government finance can be daunting and has different rules and procedures than finance and accounting found in the private or third sectors. We therefore believe it is essential that all incoming cabinet members receive bespoke local government finance training as part of their induction. This training should also be made readily available for backbenchers, so they can gain the confidence to hold the cabinet to account on budgetary issues.

e) The public health grant

We were very concerned about the pressures on public health spending.

In recent years, the public health budget, and public health responsibility, has been devolved away from the Department of Health and Social Care (DHSC) and down to local councils. Unfortunately, with this devolution has also come cuts. We learnt that current public health spending in Brent was in-line with the budget, but that the core grant from Public Health England had been reduced from £21.4m to £20.8m in 2019/20.

There are many things that councils used to do before the devolution of this responsibility which had a clear public health ethos. Due to pressures on the main revenue budget, many councils have been tempted to fund these services through the public health core grant so they can be maintained even when the revenue support grant is further withdrawn.

An example of such an approach in the budget we were scrutinising was the plan to re-commission health checks for those people with learning difficulties to include public health outcomes. It is well known that those with learning difficulties are less likely to visit their GP and therefore at higher risk of a life-threatening condition which may go undiagnosed until it is too late. Tackling this with health checks in care centres is obviously a laudable thing for the council to pursue and undoubtedly this work has a public health angle.

However, this strategy can also be problematic. Firstly, it reduces the amount of new and targeted public health projects the council can initiate. Public Health England barely runs any

such projects any longer because the money has been devolved to councils, but if councils just use the money to maintain schemes they already have up and running then there is a clear gap. And, secondly, it could be argued to be merely kick the can down the road, as we are now seeing the public health grant being reduced in the same way as the revenue support grant.

We really value public health work, which, when done effectively, can save the public purse fortunes in the long run by preventing the need for expensive medical treatments. Prevention is always better than cure. With budgets cut from all angles there is also no obvious alternative solution which would readily allow the council to deliver the full suite of public health work we would ideally like to see. Central government's demand that councils should 'do more with less' was always an impossibilist dream.

However, we would just like to note that making savings in the revenue budget by moving more services into the public health budget is not a sustainable policy for the long term and the council should be very wary before doing so.

f) Capital spending

We also took the time to discuss the way in which Brent prioritises its capital spend, and in particular how this can be used strategically to make savings in our revenue spend – the part of the council budget under the most chronic pressure – in future years. We agreed with the chair and vice chair of the audit committee that this is the goal the council should be aiming for, and recommended that this committee take the time to analyse the success of Brent's capital investments against this criteria.

In particular, the panel noted the work of I4B in securing properties which could become assets for the Council, but also reduce the money spent each year providing temporary housing in expensive privately rented accommodation.

We think this model – which allows us to provide a great service to those in need, increases our assets, and reduces our outgoings – is one which should be followed for all other capital projects. The acquiring, or building, of traditional council housing, is also something which would meet this test. We are aware that, in previous years, the existence of 'right to buy' legislation has acted as a key disincentive for local authorities to build social housing. The argument was that it was not prudent to borrow money over a cycle of a minimum of twenty years to build new council homes, if, after just three years of residency the tenants could purchase these properties for far below the market value.

However, the fact that market values in Brent are presently so high, and that only those in the greatest need now get access to the limited social housing stock we currently hold, means it is highly unlikely that many tenants would be able to afford to buy their council home, even with the maximum permitted discount of £100k.

The panel believes this is positive news, and we therefore hope to see an acceleration in the building of new council stock in the coming few years.

g) Business rates

Much of this section of the report has focussed on the extreme pressures on local government finances. The disappearance of the revenue support grant, the difficulty in continuing to raise council tax and uncertainty about other grants we receive, means that is more important than ever that Brent looks for ways to maximise the money it can raise through business rates retention.

Therefore, we reiterate our calls from previous panel reports that the council leaves no stone unturned in its efforts to grow our local private sector.

We have previously recommended that the council builds on its business board by establishing a single post, or small team, whose sole role would be to attract business to the borough. We believe that this could be funded through incentives with the additional rates brought into the borough used to pay costs and wages, it would therefore not represent a significant new financial burden.

We would also emphasise that significant private sector experience be essential for anyone applying for this position or team, and that the role not be specifically tied to any one department within the council. Instead the business manager or business team should have free reign to float between departments identifying areas where the work of the council may be making things unnecessarily (we would very much emphasise the word ‘unnecessarily’) difficult for businesses and suggesting improvements.

Of course, they should not have the only or final say and the council should never simply become a tool of business, but with such huge changes to the financing of local government soon to be upon us we feel that creating a new point of view within our structures could be essential in ensuring Brent takes a lead in adapting to life after the central government grant.

In other countries, such as Germany, membership of a Chambers of Commerce is compulsory for registered businesses ensuring that these Chambers are much more powerful and authoritative voices for businesses in their areas and that they have a semi-formal relationship with public bodies. The option suggested by the panel for Brent could replicate some of the best features of this system.

In addition, we believe there is much more the council could do in the arena of procurement. One in every seven pounds in the UK is spent by the state, making procurement one of the key levers that any public sector body has to boost business, employment and the economy.

Brent Council is ideally placed to act as a central coordinator bringing together all public sector bodies which procure services in Brent and get them to synchronise their pre-qualification policies. This would give a strong message that Brent is open for business and encourage businesses to base themselves here so that they can access many different procurement opportunities, and in the long term pay more business rates back into Brent. Currently many businesses feel frustrated and locked out of the public sector procurement process. All public sector bodies set their own pre-qualification test for procurement contracts, so in any given area the Council might ask for copies of accounts dating back five years and a biography of the CEO, the Fire Service might ask for six years of accounts and a biography of every director, the NHS Clinical Commissioning Group for something different altogether.

We would emphasise that within in this there would also be a golden opportunity to ensure further Living Wage payment within local supply chains if such a commitment became a more regular requirement to secure local procurement opportunities.

3. Departmental savings

The panel also took the opportunity to question cabinet members and directors about specific savings proposed in their departments. We have summarised some of the key points that emerged from these discussions below.

a) Children and young people

The proposal designated as CYP 001 aims to clawback money from defunct direct debits. This is based on similar work undertaken by the adult social care team and so we sought (and received) assurance that the two departments would work closely together to learn any lessons and ensure that the assumed savings emerge from a good evidence base.

We also discussed the saving CYP 002 which aims to generate income by selling spaces at our Ade Adepitan Short Breaks Centre to neighbouring authorities at market rates. We were pleased to have it confirmed that young people who are Brent's responsibility would always get first preference, and that only surplus places would be sold.

The panel were assured that the relevant market research and due diligence had been undertaken and that there would be demand for these services. Barnet has already agreed to purchase some of the places when necessary, and Ealing has recently closed its own short breaks centre and so will have need for this service in its neighbouring borough.

We noted that Brent performs well in the area of CYP¹. This is particularly impressive as Brent is not one of the highest spending London boroughs in this area.

The Department for Education (DFE) has recognised this and asked Brent to share its expertise with other authorities who may not be performing as well, even with bigger budgets. However, they will not provide any financial compensation to cover the officer time required to do this, and so this would represent a cost to the council.

On a more concerning note, we discussed that lack of democratic accountability over the way the Dedicated schools grant (DSG) is allocated, and the implications for Brent's finances. The DSG comes into Brent, but is then allocated by the school's forum, a body the council has a strong relationship with, but not one that is directly elected. They are able to

¹ Highest-ever Ofsted rating for Brent, The London Borough of Brent, July 2018
<https://www.brent.gov.uk/Council-news/july-2018/highest-ever-ofsted-rating-for-brent/>

carry forward a small deficit when allocating funds, something that has happened recently due to demands on the high needs block of the DSG. Eventually, the council may have to alleviate these costs by investing to build a new special school, rather than paying for special provision in mainstream schools – a similar spend-to-save rationale as the I4B project discussed above. But until this is feasible an increasing deficit in the area of school's spending could have a significant impact on our general revenue budget which will have to make up the shortfall.

We are aware that the chief executive has commissioned a report looking at this problem and how it can be mitigated. We would recommend that this comes to the Community and wellbeing scrutiny committee as soon as it is ready so this committee can examine the issue and suggest ways to move forward.

b) Environment

The panel commended the income generation work carried out by this department and noted in particular how the investment in the vehicles and capacity required to deliver funerals has already paid for itself.

There is always a balance to be struck in what the council charges for environmental services. It was noted that the council provides a very similar pest control service to that which can be acquired in the private sector, but for around one-third of the price. There would therefore be a case for doubling our prices which could increase income, whilst also keeping our service highly competitive.

However, the council also arguably has a duty to provide such services at an affordable rate, particularly so our most vulnerable residents have a chance to access them. So, whilst Brent should look for income generation opportunities wherever possible – to offset the cuts to our revenue support grant – we will never be able to act as a fully commercial business.

Additionally, we discussed how some savings within this department are significant, but can only be gained once. The most obvious example in this year's budget would be the approximately £700,000 which has been accrued from the sale of additional cemetery space. This space cannot be sold again next year.

To acknowledge the great work of the department in achieving these savings, we believe that this money should be ring fenced to be spent on a project with an environmental theme. In line with the council's priorities, and the fact that Brent has recently declared a climate

emergency, the obvious area for spending this money would be on improving air quality. There are actions that can be undertaken by the authority to improve air quality where a one-off capital injection of £700,000 would make a significant difference.

We believe the most notable is in the area of tree planting. The council currently does not have the revenue budget to replace all diseased or dying trees it removes (outside of those removed as part of the footway improvement plan), or to plant all of the mature trees it would like to. The presence of mature trees on our streets can help to reduce levels of carbon in the atmosphere and significantly reduce stormwater runoff. We will therefore be recommending to cabinet that this pot of money is ring fenced and invested in a tree planting scheme.

On a similar note, we commended the 'spend-to-save' rationale of the proposal designated as R&E 004, which will deploy a dedicated officer to more proactively recover the cost of repairs from developers and builders causing damage to the public highway. We think a similar model can be used elsewhere within the council, for example hiring more trading standards officers to proactively chase cash under proceeds of crime legislation. The borough already does great work to crack down on illegal ventures, including 'beds in sheds', fake travel agents, and delinquent landlords – there must be more opportunity to claw back our costs from those found guilty of these acts.

Our ability to generate income is limited by legislation in some areas. For example, we are currently barred from charging motorcyclists to park in resident parking bays and pay and display bays. This seems unfair as motorbikes still contribute to poor air quality (albeit to a lesser degree than cars) and they should therefore be liable to some charges. We would urge Brent to work with other boroughs, through London Councils and the LGA, to lobby for the powers to levy proportionate charges on parked motorcycles.

This would build on our suggestion, in last year's budget scrutiny panel report that Brent lobby for the power to set a 'tourist tax' as is commonplace in most countries across the world. We know that several councils are becoming more vocal in their demand for this power, including Edinburgh, Birmingham, Bath and Cambridge and we believe Brent should do the same. After a decade of austerity, this is no time for councils to be bashful in their demands of central government, we simply cannot become financially independent without such new powers.

When discussing the Community Infrastructure Levy (CIL) it was noted that the council's Infrastructure Delivery Plan should direct how CIL spending is prioritised. This document should come to the appropriate scrutiny committee for pre-scrutiny. The council, its partners and other stakeholders use this document to ensure that the appropriate infrastructure is provided to support the growth anticipated in the Brent Local Plan. It is used to inform decisions on infrastructure delivery, for example, the allocation of CIL receipts to projects or allocating specific sites for use as schools or other infrastructure. It may also be used where appropriate as supporting evidence in bids for infrastructure funding.

In addition, we noted that more efficiency savings could be generated by the idea of aggregating CIL money for particular outputs. The clear example given was for tree planting. Currently, members and the council are encouraging community groups and individuals across the borough to apply for one-off sums of money for tree planting in the area. We believe it would be more efficient if a certain amount of the CIL budget was allocated as the 'Brent Trees Fund' which fund a certain number of trees per year. People would bid into this fund directly, making the process of allocating new trees more strategic and efficient. Another example would be using CIL to roll out recycling-friendly litter bins, which would again assist our aims to overcome the climate emergency and enhance a universal service for residents.

c) Adult social care

It may be surmised that investment in Adult Social Care spending has an impact on medium and longer term budgets to the council and to external organisations like the NHS.

We discussed, at some length, with the relevant senior officers the very limited flexibility that the council has with the eligibility criteria for adult social care. In the wake of a full decade of cuts to the council's revenue Brent has cut back to providing statutory services only in this arena. This is at least provided consistently and the borough has never lost a judicial review on how it interprets eligibility.

However, following a statutory provision only model can exclude some people we would ideally like to support, for example those facing chronic loneliness or isolation. It would be unrealistic of the panel to recommend that Brent spends money it does not have on expanding support to these areas. But we do believe that the council could do more to signpost residents to voluntary sector alternatives when they just miss out on the eligibility criteria, for example having a few hundred pounds more than the £16k savings cut off.

This is not just good practice, but will help to ensure that Brent has an effective preventative offer. It will also build on Brent's work to establish community hubs where local residents can go to access excellent support and advice, in a council property but from an independent and expert charity.

To truly deliver this model we will need a culture change within the civic centre and recommend that the council develop a strategy to deliver this.

4. Conclusion

We hope this report is seen as a fair and balanced one. We have tried at all times to understand the huge financial pressures that the council is under as a result of the severe reductions in our sources of revenue following ten years of central government cuts.

There are cuts contained in the proposed budget which are unpalatable and would not be pursued unless we were in these specific financial circumstances. So, we do not oppose these for opposition's sake because we know if these were taken out of the budget, money would have to be found elsewhere and that such alternative cuts could be even more painful.

Equally, there are areas where the council is working innovatively to generate income, and we recognise and praise these efforts.

This report is not the end of the budget scrutiny process and we look forward to discussing our recommendations, and the budget as a whole, in more depth at future scrutiny, cabinet and full council meetings.

5. Recommendations

1. Brent's finance team should continually review the headline budget totals allocated to each department in a bid to avoid repeated budget under/overspends.
2. The council should change its procedure to ensure that its financial reports clearly state which lead member has signed off on which mitigating steps, and on which date.
3. Cabinet members should also feel that it is incumbent upon them to bring back any mitigation steps which might change council policy, to the lead group.
4. All incoming cabinet members should receive bespoke local government finance training as part of their induction. This training should also be made readily available for backbenchers, so they can gain the confidence to hold the cabinet to account on budgetary issues.
5. The Audit committee should analyse the council's recent capital investments to discover the extent to which they have achieved their goal of reducing Brent's ongoing revenue costs.
6. Brent should explore all possible avenues to support businesses in Brent, particular by looking at how local public sector organisations procure services.
7. A report on the way the DSG, and in particular its high needs block, is spent should be sent to the community and wellbeing scrutiny committee as soon as possible.
8. The council should ringfence the money generated by the one-off sale of additional burial plots for a programme of street tree planting and maintenance.
9. The council should explore the opportunity to 'spend to save' by hiring new trading standards officers to rigorously pursue money under proceeds of crime legislation.
10. Brent should work with other boroughs, through London Councils and LGA, to lobby for the powers to levy proportionate charges on parked motorcycles. The council should also step up their campaign for the powers to levy a tourist tax in Brent.

11. Brent's Infrastructure Delivery Plan should direct how CIL spending is prioritised. This document should come to the appropriate scrutiny committee for pre-scrutiny.
12. Opportunities to drive efficiency by aggregating CIL funds, for example for new trees and recycling friendly bins, should be pursued.
13. The council should develop a strategy to ensure its officers signpost residents to voluntary sector alternatives wherever possible.
14. The work of budget scrutiny should be more closely coordinated with the audit committee, who should have a place on next year's panel.

Detailed Capital Programme 2020/21 – 2024/25

Portfolio Holder	Portfolio	Capital Board	2019/20 (Revised Budget)	2020/21 Budget	2021/22 Budget	2022/23 Budget	2023/24 Budget	2024/25 Budget	Total 2020/21 to 2024/25
			£M	£M	£M	£M	£M	£M	£M
Resources: Cllr Margaret McLennan	Civic Centre NEW	Corporate Landlord	0.792	0.850	0.500	0.500	0.500	–	2.350
	Digital Strategy NEW	Corporate Landlord	2.851	4.500	4.000	3.000	1.000	–	12.500
	Energy	Corporate Landlord	0.784	–	–	–	–	–	–
	ICT NEW	Corporate Landlord	0.744	2.500	3.000	–	–	–	5.500
	Libraries	Corporate Landlord	0.050	0.050	–	–	–	–	0.050
	Property Management	Corporate Landlord	0.333	7.700	7.000	5.000	–	–	19.700
	Property Management – United Colleges Group NEW	Corporate Landlord	5.000	6.500	38.500	–	–	–	45.000
Regeneration: Highways. Planning: Cllr Tatler	South Kilburn Estate Regeneration	South Kilburn	10.628	23.972	23.806	15.014	5.931	5.452	74.174
	Bridge Park Regeneration	Regeneration	0.400	1.012	–	–	–	–	1.012
	New Homes Bonus	Regeneration	0.017	–	–	–	–	–	–
	Olympic Way Pedestrian Improvements	Regeneration	1.086	3.400	8.700	–	–	–	12.100
	Housing Zones	Regeneration	0.446	0.115	–	–	–	–	0.115
	Harlesden Regeneration NEW	Regeneration	2.100	4.000	–	–	–	–	4.000
	Morland Gardens NEW	Regeneration	–	10.000	10.000	23.000	–	–	43.000
St Raphael's: Cllr Tatler	Liveable Neighbourhoods NEW	Regeneration	–	0.200	0.450	0.450	–	–	1.100
	St. Raphael's Estate Regeneration	St Raphael's	0.988	0.300	–	–	–	–	0.300
Regeneration: Highways. Planning: Cllr Tatler	Landscaping	Public Realm	0.564	0.471	0.084	0.006	–	–	0.561
	Regen & South Kilburn - S106	Public Realm	1.095	0.242	–	–	–	–	0.242
	Highways & Infrastructure S106	Public Realm	1.273	1.017	–	–	–	–	1.017
	Wembley Transport Improvements	Public Realm	2.474	2.500	–	–	–	–	2.500
	Highways & Infrastructure	Public Realm	10.133	17.000	3.500	3.500	3.500	–	27.500
	Transport For London [TFL]	Public Realm	2.970	2.247	2.145	2.145	2.145	–	8.682

Appendix E

Portfolio Holder	Portfolio	Capital Board	2019/20 (Revised Budget)	2020/21 Budget	2021/22 Budget	2022/23 Budget	2023/24 Budget	2024/25 Budget	Total 2020/21 to 2024/25
			£M	£M	£M	£M	£M	£M	£M
Public Health: Culture & Leisure: Cllr Krupesh Hirani	Sports & Culture	Public Realm	1.049	0.105	-	-	-	-	0.105
Environment: Cllr Krupa Sheth	Parks	Public Realm	0.734	0.360	-	-	-	-	0.360
	Environmental Health	Public Realm	0.047	-	-	-	-	-	-
	Parking & Street Lighting	Public Realm	0.833	-	-	-	-	-	-
	Children & Youth Facilities	Schools	0.021	-	-	-	-	-	-
	Completed School Projects	Schools	0.465	-	-	-	-	-	-
	Expansion of School Places	Schools	1.125	0.375	-	-	-	-	0.375
	Phase 3 Permanent Primary	Schools	3.386	-	-	-	-	-	-
	Phase 4 Permanent Primary	Schools	0.007	-	-	-	-	-	-
	PSBP Phase 2 Secondary	Schools	0.686	-	-	-	-	-	-
	Secondary School Expansion NEW	Schools	0.170	6.850	14.040	14.040	-	-	34.930
	School Capital Improvement	Schools	4.930	4.248	2.337	2.897	-	-	9.483
Housing & Welfare Reform: Cllr Eleanor Southwood	Aids & Adaptations	Housing GF	5.845	-	-	-	-	-	-
	Travellers Site	Housing GF	0.039	-	-	-	-	-	-
	Mixed Development	Housing GF	13.927	58.472	57.233	53.900	28.600	-	198.205
	PRS I4B – Phase 1	Housing GF	29.749	3.903	-	-	-	-	3.903
	PRS I4B – Phase 2	Housing GF	40.000	23.500	23.500	23.500	-	-	70.500
	RTB Affordable Housing NEW	Housing HRA	7.300	20.000	0.795	-	-	-	20.795
	Enfranchisement	Housing HRA	2.235	0.402	-	-	-	-	0.402
	New Council Homes Programme (NCHP) - Phase 1	Housing HRA	3.243	0.290	-	-	-	-	0.290
	New Council Homes Programme (NCHP) - Phase 2	Housing HRA	8.874	4.326	14.666	0.737	0.079	-	19.808

Appendix E

Portfolio Holder	Portfolio	Capital Board	2019/20 (Revised Budget)	2020/21 Budget	2021/22 Budget	2022/23 Budget	2023/24 Budget	2024/25 Budget	Total 2020/21 to 2024/25
			£M	£M	£M	£M	£M	£M	£M
	Major Repairs & Maintenance NEW 2021/22	Housing HRA	18.509	17.000	17.000	–	–	–	34.000
	New Council Homes Programme (NCHP) - Phase 3&4&5	Housing HRA	5.704	23.462	32.524	5.986	0.816	–	62.788
	St Ralph's Acquisition	Housing HRA	1.247	–	–	–	–	–	–
	In Borough Acquisition Strategy	Housing HRA	62.920	26.600	9.148	1.333	–	–	37.081
Adult Social Care: Cllr Harbi Farah	NAIL	Housing GF	3.379	12.224	5.810	1.270	–	–	19.304
All	Capitalisation NEW	Capitalisation	–	1.776	1.776	1.776	–	–	5.328
			261.151	292.470	280.514	158.054	42.570	5.452	779.060
Funding Sources	Grants & Other Contributions		44.411	46.207	49.200	27.782	2.145	–	125.334
	S106 & CIL		7.584	18.296	18.014	1.950	–	–	38.260
	Capital Receipts		15.756	28.753	15.175	19.514	5.931	5.452	74.825
	Reserves		31.929	19.819	–	–	–	–	19.819
	Major Repairs Allowance		17.658	17.000	16.404	–	–	–	33.404
	Revenue Contribution		0.550	4.147	4.596	4.000	4.000	–	16.743
	Prudential Borrowing		143.264	158.247	177.125	104.809	30.495	–	470.676
			261.151	292.470	280.514	158.054	42.570	5.452	779.060

Total new schemes c£180m

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Appendix F

Project No.	Programme	Project Name	Purpose of Paper / Description	£M
PL001	HCIB	Stonebridge	The construction of 140 units at an estimated cost of £45m (£36.5m Build Cost, £3.7m fees and £5m contribution towards education purposes) as agreed in 2013. The 40 units will be developed as a NAIL scheme and 100 units will be sold to I4B and rented on affordable basis.	43.9
PL002	Public Realm	Wembley Hill Road/ Park Lane / Wembley Park Drive Signal Junction Improvements	Provision of pedestrian phases and enhanced pedestrian crossing facilities at a 5-arm signal junction in the close vicinity of the Wembley Regeneration area. The scheme is not currently a road safety priority but there is a need to improve safety and accessibility due to increased traffic volumes and pedestrians visiting the area.	0.4
PL003	Regeneration	New east-west route Alperton Housing Zone	Contribution for the creation of a new east-west route through SSA A6 and A5 in Alperton Housing Zone, to improve the accessibility to the sites and connectivity to both Alperton and Stonebridge stations.	1.5
PL004	Regeneration	Wembley Housing Zone	£110m has been approved under the Strategic Projects Pipeline for delivery of this development over the planning period, for a mixed-use scheme on land to the east of Cecil Avenue in Wembley, incorporating 250 new homes with 26% or 64 larger family 3 and 4 bedroom homes, 3,600sqm commercial and community floor space, and a publicly accessible landscaped courtyard. The masterplan vision is to revitalise the eastern stretch of Wembley High Road between Park Lane and Wembley Triangle. The housing-led mixed use developments will deliver a minimum 35% affordable housing by unit, with the remaining homes for private sale to help cross subsidise the affordable housing. Successful regeneration of this gateway location within the Wembley Opportunity Area will help link the established Wembley Central town centre with the new Wembley Park regeneration around the Stadium.	110.0

Appendix F

Project No.	Programme	Project Name	Purpose of Paper / Description	£M
PL005	HCIB	CCTV	Since BHP came in house an assessment has been commissioned by BHM to assess all BHM (BHP as was) sites to identify the status of all CCTV infrastructure and systems and identify potential costs for bringing transmission back to the civic CCTV room. This could ensure effective monitoring of all now council owned CCTV across the borough to align with the public realm capital CCTV upgrade project. The assessment is still being completed and a report from consultant is expected imminently. The outcome of report will determine if BHM want to request any capital funding for the upgrade of BHM CCTV. An ideal scenario would be to extend the public realm upgrade project to include the BHM upgrade to become one wider project as all will be governed by the council CCTV service going forward.	1.6
PL006	South Kilburn Regeneration	ERSK Cap bid 5- CCTV and Neighbourhood WI-FI (SK)	Community Protection Team are planning on majorly upgrading the way CCTV operates in South Kilburn. Currently, footage on the CCTV can only be viewed by obtaining footage from that specific camera. There is a private fibre optic cable running around South Kilburn linking street CCTV and going back to a node site in Kilburn High Road. Instead, the Community Protection Team want to make it possible that footage from the cameras goes straight to the Civic Centre via Wi-Fi. The Wi-Fi would be a private system, and not available to the public. The Community Protection Team have already performed an exercise with their consultant in finding out how to connect existing BHP CCTV systems so that they can be monitored and controlled at the Civic Centre. This idea is a good way of maximising security measures for the area, and to help make South Kilburn a safer place to live. Beyond this, there is a desire to increase the level of public available Wi-Fi. GLA reports suggests that there are over 5000 public Wi-Fi hotspots across London. The Mayor has spent over £1.5 million to increase this number through the Super Connected Cities Programme (SCCP). Currently, there are no free public Wi-Fi spots in South Kilburn. The regeneration aims to increase the level of free and basic Wi-Fi available to residents. Free public Wi-Fi is a good way of helping residents to remain connected when out of their homes, and to increase their overall satisfaction with the area.	1.0
PL007	Corporate Landlord	Energy Schemes	The Energy team are working with RE:FIT to develop future energy efficiency and renewable energy schemes. This is focused on LED installation and solar currently.	5.0
PL008	South Kilburn Regeneration	William Dunbar/Saville (ERSK)	Proposal to bring forward a development in South Kilburn to accelerate delivery of the programme. Build on space around existing buildings, decant tenants, then demolish and build. Will require earlier buy back and a higher level of affordable than envisaged in the Masterplan (as end of programme no decants were expected to this site so more private were due to be built) due to decant requirements.	10
PL009	South Kilburn Regeneration	ERSK Cap bid 2- South Kilburn Enterprise Hub Phase 2	The delivery of a high-quality development, comprising an enterprise hub, a nursery school, community facilities, housing and soft and hard landscaping and play.	6.0

Project No.	Programme	Project Name	Purpose of Paper / Description	£M
PL010	Corporate Landlord	Commercial Property Investment Fund	Investigate the potential of the council setting up a commercial property fund for investment return. The focus would be to try and purchase properties in borough to aid with regeneration and growth efforts.	50.0
PL011	Public Realm	Kilburn Area Liveable Neighbourhood Scheme	The 'Kilburn High Road' Major Scheme bid was submitted in 2015 by the London Boroughs of Brent, Camden and Westminster. The scheme received £250,000 for development and traffic modelling, however no further funding was awarded. The scope of the previous scheme differs from that in this bid as proposals only extended to the High Road itself.	9.6
PL012	HCIB	St Raphael's estate (ERSK bid 4)	Brent's 2014-2019 Housing Strategy explains that St Raphael's is also expected to deliver new supply alongside improvement or replacement of existing stock in line with regeneration priorities. St Raphael's as a 'priority neighbourhood'. Works to the St Raphael's estate are expected to fundamentally change the area. It will transform the state of housing and local infrastructure. Regeneration here will help to improve the economic, social and environmental conditions in the Borough. This project will also ensure the appropriate flood defences are put in place to support the regeneration of St. Raphael's. Before works can begin, there will be significant high-level studies and preliminary design consultations. The project will proceed subject to a yes ballot.	100.0
PL013	South Kilburn Regeneration	ERSK Cap bid 9- Open Spaces	Delivering high quality open spaces across the South Kilburn Regeneration programme.	9.0
PL014	Public Realm	Neighbourhood Managers Vehicles	The purchase of five electric vehicles to be used by the Neighbourhood Managers and Enforcement Team, acting a visual representation and branding of the new service. The service currently uses three Smart Cars which have come to the end of their life and need to be replaced. We want to provide electric vehicles to be forward thinking and environmentally friendly.	0.2
PL015		Greater London Mutual Co-operative	Greater London Mutual is a banking proposal that appears to have features that may assist in tackling social inclusion. If the council were to support it then it would be as a part of a consortium of other investors, and work is continuing to assess this interesting proposition, so it is included at this stage as a contingent sum pending further due diligence work.	5.0
PL016	Public Realm	Kensal Rise priority bus Scheme	Bus Priority funded improvements to the Chamberlayne Corridor to include Traffic and Parking management, wider pavements, new bus shelters, cycling and walking improvements near Kensal Rise Station and on Kilburn Lane and Chamberlayne Road.	2.1
PL017	HCIB	Affordable Housing (Aids & Adaptations)	The purpose of Aids and Adaptations is for providing adaptations for disabled people who qualify.	22.5
PL018	Regeneration	Strategic Industrial Locations (SIL), Neasden	Acquire up to 8 acres of SIL adjacent to Northfields, to the south of River Brent and to the west of the Grand Union Canal. St George's are proposing a new 100,000 sq. ft. industrial unit to the south of the River Brent and with the loss of SIL across London, this is an opportunity to protect and intensify employment provided on these sites within the Alperton Housing Zone boundary, some of which provide very low-density employment (a car sales yard and self-storage are two of the existing uses). London may also see a greater shift towards industry and residential co-location, so this is a long-term investment opportunity.	25.0

Appendix F

Project No.	Programme	Project Name	Purpose of Paper / Description	£M
PL019	South Kilburn Regeneration	ERSK Cap bid 7- Infrastructure (streets/public realm)(Carlton Vale Boulevard)	To radically overhaul and improve the local infrastructure. This will involve changing the character of Carlton Vale which currently acts as a divider of the South Kilburn estate. Improve its townscape attributes and give greater priority to pedestrians and cyclists. Further tree planting will be undertaken to soften the street to give a boulevard type feel. Within the South Kilburn estate this will be through designing streets to limit vehicle speeds to 20mph.	20.1
PL020	Public Realm	Sports Programme	Improvement works to a range of grounds (including football, cricket and rugby) and their facilities, feasibility studies and longer-term improvement works.	2.3
PL021	Corporate Landlord	Land & Property strategic acquisitions (general)	Papers will be brought to the CIP, as and when strategic land opportunities arise and are developed within regeneration areas. The key focus areas are Alperton and Staples Corner	44.5
PL022	Public Realm	Ealing Road Shopping Area	Ealing Road shopping area suffers from a poor quality and traffic dominated public realm. Highways and Infrastructure are currently undertaking a public realm and safety improvement project to the area around Alperton Station and Alperton Community School, the gateway to the Alperton Regeneration area. The proposed investment would enable us to create a high quality public realm, improve safety and accessibility for pedestrians and cyclists. There is £150,000 of funding available from Transport for London to address collision accidents in 2019/20 and £20,000 of S106 but the area would significantly benefit from a wider improvement scheme along the whole corridor to support regeneration and growth.	1.8
PL023	Corporate Landlord	Property Management	Pipeline funds exist for one off major repairs on the commercial property stock. Currently there are no planned repairs, but a pre-planned-maintenance schedule is being created.	1.4
PL024	Regeneration	Bridge across railway Met line & Jubilee Line	Pedestrian and cycle bridge across the railway lines; to connect Wembley Growth area to the eastern part of Chalk Hill to improve access for residents from Welsh Harp area. Significant cost, reasonably high level of benefit. Will need agreement and support of Network Rail.	12.0
PL025	HCIB/St Raphael's	Bridge across the Chiltern Line into Monks Park	Provide bridge link across the Chiltern Line to connect Wembley Park to Monks Park, facilitating better PTAL and connectivity to Monks Park and St. Raphael's.	10.0
PL026	South Kilburn Regeneration	ERSK Cap bid 1- South Kilburn Schools	Provision of sufficient school places for both primary and nursery children.	5.6
PL027	Regeneration	A5 Link Crossing to new Thames link Station	Contribution to create a significant crossing at grade across the A5 to the new Thames link station	6.5
PL028	Schools	Special Education Needs Demand	To meet the demand for additional SEND places as required in the School Place Planning Strategy 2019–2023.The main areas of identified growing need are Autistic Spectrum Disorder (ASD), Moderate Learning Difficulties (MLD), Severe Learning Difficulties (SLD) and Social Emotional Mental Health (SEMH) difficulties	35.5
PL029	Schools	Family Hubs	Developing the existing 17 Children's Centres into eight integrated Family Hubs for Brent families with children aged 0-18years, and to 25 years for those with children with disabilities. The new Family Hubs will build on existing children's centre services and the local authority statutory responsibilities regarding the provision of children's centres.	0.7
PL030	Schools	Roundwood Youth Centre	Proposals for existing youth centre to become an Alternative Provision Free School.	0.1
PL031	Regeneration	Neasden Eastern Gyratory	The proposal is to address the traffic flow, bus journey times, pedestrian and cycling connectivity between Neasden station, the Town Centre and surrounding areas. The opportunities should create a pleasant and more inviting environment for pedestrians and cyclists, which will enhance connectivity to and from the town centre. Stage 1 - Option 1 costs are estimated at £1.4m.	1.4

Appendix F

Project No.	Programme	Project Name	Purpose of Paper / Description	£M
PL032	Schools	Additional Resource Provision	Proposal for programme to meet SEN places resource provision.	0.5
		GRAND TOTAL		545.2

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Capital Strategy Report 2020/21

1.0 Introduction

- 1.1 The capital strategy is a requirement for authorities following the publication of the revised Prudential Code for Capital Finance in Local Authorities in 2017. Our Capital Strategy has been produced in accordance with the guidance.
- 1.2 The Capital Strategy provides:
- A high-level overview of how capital expenditure, capital financing and treasury management activity supports the provision of local public services;
 - an overview of how associated risk is managed; and
 - the implications for future years budget and financial sustainability.

2.0 Capital Expenditure and Financing

- 2.1 Capital expenditure is where the Council spends money on assets, such as property, vehicles or other assets that will be used for more than one year. In local government this includes spending on assets owned by other bodies, and loans and grants to other bodies enabling them to buy assets. The Council has some limited discretion on what counts as capital expenditure, for example assets costing below £5,000 are generally not capitalised and are charged to revenue in year. Details of the Council's policy on capitalisation is set out in the annual Statement of Accounts.
- 2.2 In 2020/21, the Council is planning capital expenditure of £291M as summarised below:

Table 1: Prudential Indicator: Estimates of Capital Expenditure in £ millions

£M	2019/20 forecast	2020/21 budget	2021/22 budget	2022/23 budget	2023/24 budget	2024/25 budget
Capital Expenditure	261.2	292.5	280.5	158.1	42.6	5.5
Financing:						
General Fund services	81.5	173.0	182.9	126.6	41.7	5.5
Council housing (HRA)	110.0	92.1	74.1	8.0	0.9	0
Capital investments	69.7	27.4	23.5	23.5	0	0
TOTAL	261.2	292.5	280.5	158.1	42.6	5.5

- 2.3 The Capital Programme comprises of projects approved by Cabinet from previous year budget setting, new projects approved in year and bids promoted from the pipeline provision for Cabinet approval in February 2020.

The main General Fund capital projects include (South Kilburn Estate Regeneration £74.2M, i4B Street Properties Purchase £110M, Schools Expansion programme works £35.1M, NAIL (Supported Living) £19M and Morland Gardens Regeneration £43M). The Council also plans to incur capital expenditure on investments, which are detailed later in this report in paragraph 2.9.

- 2.4 The Housing Revenue Account (HRA) is a ring-fenced account which ensures that council housing does not subsidise, or is itself subsidised, by other local services. HRA capital expenditure is therefore recorded separately, and includes the building of new homes as well as expenditure on improving and maintaining council homes over the planning period.
- 2.5 Full details of the Council's capital programme, including the project appraisals undertaken can be found within the capital programme and capital pipeline proposals 2020/21 presented to Cabinet in January 2020.
- 2.6 All capital expenditure must be financed, either from external sources (government grants and other contributions), the Council's own resources (revenue, reserves and capital receipts) or debt (borrowing, leasing and Private Finance Initiative). The planned financing of the above expenditure is as follows:

Table 2: Capital financing in £ millions

£M	2019/20 forecast	2020/21 budget	2021/22 budget	2022/23 budget	2023/24 budget	2024/25 budget
External resources	52.0	64.5	67.2	29.7	2.1	0
Own Resources	65.9	69.7	36.2	23.5	9.9	5.5
Debt	143.3	158.3	177.1	104.9	30.6	0
TOTAL	261.2	292.5	280.5	158.1	42.6	5.5

- 2.7 Excluding external grants and other resources most assets are funded from debt. (The position in 2019/20 to 2021/22 is somewhat unusual as the council has accumulated capital receipts and other reserves planned to be used to fund capital expenditure). As with any debt, it must be repaid over time, and for a local authority there is a statutory requirement to set aside "minimum revenue provision" (MRP) in each year's budget for debt repayment. Planned MRP to 2024/25 is as set out in the table below.

Table 3: Replacement of debt finance in £ millions

£M	2019/20 forecast	2020/21 budget	2021/22 budget	2022/23 budget	2023/24 budget	2024/25 budget
MRP	10.2	10.2	11.8	13.6	13.1	13.1
TOTAL	10.2	10.2	11.8	13.6	13.1	13.1

- 2.8 The Council's full minimum revenue policy statement is presented as an Appendix to the annual Council Tax and Budget Setting Report.
- 2.9 The Council's cumulative outstanding amount of debt finance is measured by the capital financing requirement (CFR). This increases with new debt-financed capital expenditure and reduces with MRP and capital receipts used to replace debt. The CFR is expected to increase to £970M during 2020/21, and to over £1bn, a 50% increase on the 2019/20 figure, by 2024/25. Based on the above figures for expenditure and financing, the Council's estimated CFR is as follows:

Table 4: Prudential Indicator: Estimates of Capital Financing Requirement in £ millions

£M	2019/20 forecast	2020/21 budget	2021/22 budget	2022/23 budget	2023/24 budget	2023/24 budget
Opening CFR	688.7	821.8	969.9	1,135.2	1,226.4	1,243.8
Capital Expenditure	261.2	292.5	280.5	158.1	42.6	5.5
External resources	(52.0)	(64.5)	(67.2)	(29.7)	(2.1)	0
Own Resources	(65.9)	(69.7)	(36.2)	(23.5)	(9.9)	(5.5)
MRP	(10.2)	(10.2)	(11.8)	(13.6)	(13.1)	(13.1)
Closing CFR	821.8	969.9	1,135.2	1,226.4	1,243.8	1,230.7

3.0 Capital Programme Governance and Prioritisation

- 3.1 The capital programme is updated annually for new schemes, revised profiling, slippage and changes in expenditure projections. The capital programme and capital pipeline proposals 2020/21 – report (included elsewhere on this agenda) sets out the indicative capital programme that will be presented to Council in February 2020 as part of the annual budget setting cycle.

Pipeline Schemes

- 3.2 During the year the individual capital sub-boards (led by Operational Directors) developed a comprehensive list of opportunities and proposals for future aspirational capital investment to meet the council's strategic objectives. These outline bids are then collated by the PMO (Programme Management Office). For 2020/21 this process has culminated in the assimilation of c50 individual outline capital proposals with a total value of c£545m and a spend profile spanning 2 to 5 years. At this stage these strategic pipeline schemes are only indicative and do not yet form part of the main programme as there is a requirement that individually they will still go through the normal approval routes (i.e. CMT/Cabinet/Council). Furthermore, officers will be required to produce detailed business cases, undertake feasibility and consult appropriately before getting to this stage.

Capital Investment Panel (CIP)

- 3.3 The main forum for reviewing the financial viability of the new capital bids is the **Capital Investment Panel (CIP)**. The panel reviews all new capital investment opportunities, oversees and maintains the list of pipeline schemes and ensures outcomes are aligned with Council's aspirations and reflective of the circumstances within Brent. The panel also ensures that projects have a viable business case and that value for money (VfM) will be delivered for the Council.

Prioritisation criteria

- 3.4 The general criteria for scoring proposals are summarised below:
- **Statutory obligations** – higher scores are applied to schemes with a greater statutory need and the need is of significance.
 - **Financial return** – higher scores are applied to schemes that generate ongoing revenue savings or capital receipts.
 - **Local demand** – higher scores are applied where the proposal will enhance residents demand and satisfaction.
 - **Complexity** – proposals that are likely to be deliverable without slippage, complicated negotiations, lots of officer time are more likely to be approved.
 - **Economic growth** – higher score are applied where proposal would contribute towards economic growth (such as enhancement to residents' employment prospects, attract new business into the local economy) in the borough.
 - **Demand management** – higher scores are applied where proposal would reduce current demand for services or, to a lesser extent reduce future demand for services.

4.0 Asset management

- 4.1 To ensure that capital assets continue to be of long-term use, the Council has an asset management strategy in place. The Property and Asset Strategy 2015-19 was approved by cabinet on 1 June 2015.

5.0 Asset disposals

- 5.1 When a capital asset is no longer needed, it may be sold so that the proceeds, known as capital receipts, can be spent on new assets or to repay debt. The Council is currently also permitted to spend capital receipts on service transformation projects until 2021/22. Repayments of capital grants, loans and investments also generate capital receipts. The Council plans to receive £28.8M of capital receipts, a significant proportion of which stems from asset disposals on the South Kilburn site as well as housing sold under the right to buy (RTB) scheme. The capital receipts in the coming financial year as follows:

Table 5: Capital receipts in £ millions

£M	2019/20 forecast	2020/21 budget	2021/22 budget	2022/23 budget	2023/24 budget	2023/24 budget
Asset Sales	15.8	28.8	15.2	19.5	5.9	5.5
Loans Repaid	10.4	3.7	5.6	1.4	0.9	0.9
TOTAL	26.2	32.5	20.8	20.9	6.8	6.4

6.0 Treasury Management

- 6.1 Treasury management is concerned with keeping sufficient but not excessive cash available to meet the Council's spending needs, while managing the risks involved. Surplus cash is invested until required, while a shortage of cash will be met by borrowing, to avoid excessive credit balances or overdrafts in the bank current account. The Council is typically cash rich in the short-term as revenue income is received before it is spent, but cash poor in the long-term as capital expenditure is incurred before being financed. The revenue cash surpluses are offset against capital cash shortfalls to reduce overall borrowing.
- 6.2 On 31st December 2019, the Authority held £491.5m of borrowing (£386.5m long term and £105m short term) at an average rate of 4.1% and £86.3m of investments at an average rate of 0.70%.

7.0 Borrowing strategy

- 7.1 The Council's main objectives when borrowing are to achieve a low but certain cost of finance while retaining flexibility should plans change in future. These objectives are often conflicting, and the Council therefore seeks to strike a balance between cheap short-term loans (currently available at around 0.9%) and long-term fixed rate loans where the future cost is known but higher (currently around 3.3%).

- 7.2 Projected levels of the Council's total outstanding debt (which comprises borrowing, PFI liabilities and leases are shown below, compared with the capital financing requirement (see above).

Table 6: Prudential Indicator: Gross Debt and the Capital Financing Requirement in £ millions

£M	2019/20 forecast	2020/21 budget	2021/22 budget	2022/23 budget	2023/24 budget	2024/25 budget
Debt (incl. PFI & Leases)	369.8	341.1	316.1	304.7	303.8	303.9
Capital Financing Requirement	821.8	969.9	1,135.2	1,224.0	1,241.6	1,228.5

- 7.3 Statutory guidance prescribes that debt should remain below the capital financing requirement, except in the short-term. As can be seen from Table 6, the Council expects to comply with this regulation.

8.0 Affordable borrowing limit

- 8.1 The Council is legally obliged to set an affordable borrowing limit (also termed the authorised limit for external debt) each year. In line with statutory guidance, a lower "operational boundary" is also set as a warning level should debt approach the limit.

Table 7: Prudential Indicators: Authorised limit and operational boundary for external debt in £ millions

£M	2019/20 forecast	2020/21 budget	2021/22 budget	2022/23 budget	2023/24 budget	2024/25 budget
Authorised Limit	1,200.0	1,200.0	1,300.0	1,400.0	1,500.0	1,600.0
Operational Boundary	1,000.0	1,000.0	1,100.0	1,200.0	1,300.0	1,400.0

- 8.2 Further details on borrowing are contained within the Council's treasury management strategy.

9.0 Investment strategy

- 9.1 Treasury investments balances arise from receiving cash before it is required to be paid out again. Investments made for service reasons or for pure financial gain are not generally considered to be part of treasury management.

- 9.2 The Council's policy on treasury investments is to prioritise security and liquidity over yield and to focus on minimising risk rather than maximising returns. Cash that is likely to be spent in the near term is invested securely, for example with the government, other local authorities or selected high-quality banks, to minimise the risk of loss. Money that will be held for longer terms is invested more widely, including in bonds, shares and property, to balance the risk of loss against the risk of receiving returns below inflation. Both near-term and longer-term investments may be held in pooled funds, where an external fund manager makes decisions on which particular investments to buy and the Council may request its money back at short notice.

Table 8: Treasury management investments in £millions

£M	2019/20 forecast	2020/21 budget	2021/22 budget	2022/23 budget	2023/24 budget	2024/25 budget
Short term investments	110.0	90.0	70.0	50.0	50.0	50.0
Long term investments	102.9	130.3	153.8	177.3	177.3	177.3

- 9.3 Further details on treasury investments are contained within the Council's treasury management strategy.
- 9.4 Decisions on treasury management investment and borrowing are made daily and are therefore delegated to the Chief Finance Officer, who must act in line with the treasury management strategy approved by Council. Reports on treasury management activity are presented to Cabinet and Full Council, whilst the Audit & Standards Advisory Committee is responsible for scrutinising treasury management decisions.

10.0 Investments for Service Purposes

- 10.1 The Council makes investments to assist local public services, including making loans to council subsidiaries and local businesses / service providers to promote economic growth. In light of the public service objective, the Council is willing to take more risk than with treasury investments, however it still plans for such investments to break-even / generate a profit after all costs.
- 10.2 Decisions on service investments are either made by Cabinet or under delegated authority, or set down in the approved investment strategy. Most loans and shares are capital expenditure and purchases will therefore also be approved as part of the capital programme. Further details on service investments are contained within the investment strategy.
- 10.3 The proposed budget includes sums for investment in the Council's subsidiary i4B for the acquisition of key worker units and street properties. These schemes aim to alleviate affordable housing pressures.

11.0 Commercial Activities

- 11.1 The Council can invest in commercial property purely or mainly for financial gain. Total commercial investments are currently valued at £9.0M consisting of 34 individual property assets generating £0.55M PA, or a yield of 6.1%.

Table 9: Property asset types and income generated in £millions

ASSET TYPES	No. of Assets	Value £M	Income PA £M
Operational	48	173.0	0.86
Commercial	34	9.0	0.55
Community Groups	40	15.8	0.18
Education	48	294.0	0
Regeneration	35	26.3	0.12
Non HRA Housing	7	4.1	0.1
TOTAL	212	522.4	1.81

- 11.2 With financial return being the main objective, the Council accepts higher risk on commercial investment than with treasury investments. The principal risk exposures include voids, diminution of capital values, etc. These risks are managed by the existing risk management framework. In order that commercial investments remain proportionate to the size of the authority they are under constant review and contingency plans are in place should expected yields not materialise.

12.0 Liabilities

- 12.1 In addition to debt of £369.8M detailed above, the Council is committed to making future payments to cover its pension fund deficit (valued at £248M – Draft Report March 2020).

13.0 Revenue Budget Implications

- 13.1 Although capital expenditure is not charged directly to the revenue budget, interest payable on loans and MRP payments are charged to revenue, offset by any investment income receivable. The net annual charge is known as financing costs; this is compared to the net revenue stream i.e. the amount funded from Council Tax, business rates and general government grants.

Table 10: Prudential Indicator: Proportion of financing costs to net revenue stream

£M	2019/20 forecasts	2020/21 budget	2021/22 budget	2022/23 budget	2023/24 budget	2024/25 budget
Financing costs	12.2	11.2	12.5	15.1	17.0	25.1
Proportion of net revenue stream %	4.6%	3.9%	4.2%	5.0%	5.6%	8.3%

- 13.2 Due to the very long-term nature of capital expenditure and financing, the revenue budget implications of expenditure incurred in the next few years will extend for up to 50 years into the future. The detailed information contained within the treasury management strategy and the Budget & Council Tax Report 2020/21, as well as the prudential indicators included above demonstrates how this is prudent, affordable and sustainable.

14.0 Knowledge and Skills

- 14.1 The Council employs professionally qualified and experienced staff in senior positions with responsibility for making capital expenditure, borrowing and investment decisions. The Council pays for junior staff to study towards relevant professional qualifications including CIPFA, ACT (treasury) & AAT for example.
- 14.2 Where Council staff do not have the knowledge and skills required, use is made of external advisers and consultants that are specialists in their field. The Council currently employs Arlingclose Limited as treasury management advisers. This approach can be more cost effective than employing such staff directly, and ensures that the Council has access to knowledge and skills commensurate with its risk appetite.

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Investment Strategy Report 2020/21

Introduction

1. The Authority invests its money for three broad purposes:
 - because it has surplus cash as a result of its day-to-day activities, for example when income is received in advance of expenditure (known as **treasury management investments**);
 - to support local public services by lending to or buying shares in other organisations (**service investments**); and
 - to earn investment income (known as **commercial investments** where this is the main purpose).
2. The Council does not currently hold any investments principally to earn income.

Treasury Management Investments

3. The Authority typically receives its income in cash (e.g. from taxes and grants) before it pays for its expenditure in cash (e.g. through payroll and invoices). It also holds reserves for future expenditure and collects local taxes on behalf of other local authorities and central government. These activities, plus the timing of borrowing decisions, lead to a cash surplus which is invested in accordance with guidance from the Chartered Institute of Public Finance and Accountancy. The balance of treasury management investments is expected to fluctuate between £20m and £100m during the 2020/21 financial year.
4. The contribution that these investments make to the objectives of the Authority is to support effective treasury management activities.
5. Full details of the Authority's policies and its plan for 2020/21 for treasury management investments are covered in a separate document, the Treasury Management Strategy 2020/21.

Service Investments: Loans

6. The Council lends money to its subsidiaries, its suppliers, local businesses, local charities, housing associations, local residents and its employees] to support local public services and stimulate local economic growth.
7. The main risk when making service loans is that the borrower will be unable to repay the principal lent and/or the interest due. In order to limit this risk, and ensure that total exposure to service loans remains proportionate to the size of the Authority, upper limits on the outstanding loans to each category of borrower have been set as follows:

Table 1: Loans for service purposes in £ millions

Category of borrower	31.3.2019 Actual	2020/21
	Balance owing	Approved Limit
Subsidiaries	79.3	500.0
Local businesses	0.2	100.0
Local charities	0.0	100.0
Housing associations	0.0	20.0
Local residents	0.0	5.0
TOTAL	79.5	725.0

8. Accounting standards require the Authority to set aside loss allowance for loans, reflecting the likelihood of non-payment. The figures for loans in the Authority's statement of accounts from 2019/20 onwards will be shown net of this loss allowance. However, the Authority makes every reasonable effort to collect the full sum lent and has appropriate credit control arrangements in place to recover overdue repayments.
9. The Authority assesses the risk of loss before entering into and whilst holding service loans by undertaking various financial checks and utilising specialists (where required) to advise on technical aspects of the investment. In addition to this credit ratings are regularly used to determine the suitability of prospective partners.

Commercial Investments: Property

10. The Council has in the past invested in property locally to secure a financial return as well as supporting regeneration activities. Total commercial investments are currently valued at £9.0M consisting of 34 individual property assets generating £0.55M PA, or a yield of 6.1%. The forecast for 2020/21 expects similar returns to 2019/20.

Table 2: Property held for investment purposes in £ millions

	Forecast 2019/20			
Asset Types	No. of Assets	Gain or (losses)	Value in accounts in £m	Income PA in £m
Operational	48	8.3	173.0	0.86
Commercial	34	0.4	9.0	0.55
Community Groups	40	0.8	15.8	0.18
Education	48	14.0	294.0	0.00
Regeneration	35	1.3	26.3	0.12
Non HRA Housing	7	0.2	4.1	0.10
TOTAL	212	24.9	522.4	1.81

11. A fair value assessment of the Authority's investment property portfolio has been made within the past twelve months, and the underlying assets provide security for capital investment. This exercise is generally conducted annually and the results are reflected in the Council's balance sheet.
12. The Authority assesses the risk of loss before entering into and whilst holding property investments by developing an intelligent repairs and maintenance strategy to minimise unplanned reactive expenditure, improve the sustainability of the estate as a whole, maximise value, reduce running costs, and thereby risk and liability. In having a planned and proactive approach to maintenance the following priorities for investment are proposed:
 - Ensuring full compliance with relevant legislation - this includes DDA, health and safety, fire regulations, legionella and asbestos;
 - Ensuring the Council's contractual or legal obligations are met in respect of repairs and maintenance obligations detailed in leases or management agreements;
 - Preserving asset life - protecting heritage assets and minimising obsolescence on existing assets;
 - Income/ efficiency - investing in assets where there is a clear potential to generate income as a consequence of by improving the quality of the asset;

- Corporate objectives - making improvements required to meet changing service demand i.e. new facilities, new fit-out, in support of community resilience; and
 - Business continuity - minimising the risk of asset failure causing unexpected interruptions to service delivery.
13. Compared with other investment types, property is relatively difficult to sell and convert to cash at short notice, and can take a considerable period to sell in certain market conditions. To ensure that the invested funds can be accessed when they are needed, for example to repay capital borrowed, the Authority takes the steps maintains a disposals programme that forms part of the capital strategy and the Medium Term Financial Planning (MTFP).

Other categories of investment

Loan Commitments and Financial Guarantees

14. Although not strictly counted as investments, since no money has exchanged hands yet, loan commitments and financial guarantees carry similar risks to the Authority and are included here for completeness. The Council holds does not hold any loan commitments of financial guarantees.

Capacity, skills and culture

15. The Council employs professionally qualified and experienced staff in senior positions with responsibility for making recommendations and decisions on commercial activities. The Council pays for junior staff to study towards relevant professional qualifications including CIPFA, ACT (treasury) & AAT for e.g.
16. Where Council staff do not have the knowledge and skills required, use is made of external advisers and consultants that are specialists in their field. The Council currently employs Arlingclose Limited as treasury management advisers. This approach can be more cost effective than employing such staff directly, and ensures that the Council has access to knowledge and skills commensurate with its risk appetite.
17. Our retained advisors provide a comprehensive training and awareness programme for elected Members, including training in relation to scrutiny of the Treasury Management function and the annual Statement of Accounts. The training programme covers, Local Government Finance, Corporate Governance, The Role of the Governance / Audit Committee and capital Programme Prioritisation.
18. The Council's treasury activity (including investments and borrowing) is

reported to the Audit & Standards Advisory Committee and full Council twice a year via a mid-year report as well as the full year outturn report.

Investment Indicators

19. The Authority has set the following quantitative indicators to allow elected members and the public to assess the Authority's total risk exposure as a result of its investment decisions.

Total risk exposure

20. The first indicator shows the Authority's total exposure to potential investment losses. This includes amounts the Authority is contractually committed to lend but have yet to be drawn down and guarantees the Authority has issued over third party loans.

Table 3: Total investment exposure in £millions

Total investment exposure	31.03.2019 Actual	31.03.2020 Forecast	31.03.2021 Forecast
Treasury management investments	103.2	50.0	50.0
Service investments: Loans	79.5	150.0	240.0
Commercial investments: Property	522.4	522.4	530.0
TOTAL INVESTMENTS	705.1	722.4	820.0
TOTAL EXPOSURE	705.1	722.4	820.0

How investments are funded

21. Government guidance states that these indicators should include details of how investments are funded. Since the Authority does not normally associate particular assets with particular liabilities, this guidance is difficult to comply with. However, the following investments could be described as being funded by borrowing. The remainder of the Authority's investments are funded by usable reserves, grants and other income.

Table 4: Investments funded by borrowing in £millions

Investments funded by borrowing	31.03.2019 Actual	31.03.2020 Forecast	31.03.2021 Forecast
Service investments: Loans	79.5	150.0	240.0
Commercial investments: Property	522.4	522.4	530.0
TOTAL FUNDED BY BORROWING	601.9	672.4	770.0

Rate of return

22. This indicator shows the investment income received less the associated costs, including the cost of borrowing where appropriate, as a proportion of the sum initially invested. Note that due to the complex local government accounting framework, not all recorded gains and losses affect the revenue account in the year they are incurred.

Table 5: Investment rate of return (net of all costs)

Investments net rate of return	2018/19 Actual	2019/20 Forecast	2020/21 Forecast
Treasury management investments	0.72%	0.72%	0.72%
Service investments: Loans	2.2%	6.2%	6.1%
Commercial investments: Property	6.4%	6.4%	6.4%

Table 6: Other investment indicators

Indicator	2018/19 Actual	2019/20 Forecast	2020/21 Forecast
Debt to net service expenditure ratio	1.55	1.39	1.18
Commercial income as a % of net service expenditure ratio	0.68%	0.68%	0.62%

Treasury Management Strategy Statement 2020/21

Introduction

- 1.0 Treasury management is the management of the Authority's cash flows, borrowing and investments, and the associated risks. The Authority has borrowed and invested substantial sums of money and is therefore exposed to financial risks including the loss of invested funds and the revenue effect of changing interest rates. The successful identification, monitoring and control of financial risk are therefore central to the Authority's prudent financial management.
- 2.0 Treasury risk management at the Authority is conducted within the framework of the Chartered Institute of Public Finance and Accountancy's *Treasury Management in the Public Services: Code of Practice 2017 Edition* (the CIPFA Code) which requires the Authority to approve a treasury management strategy before the start of each financial year. This report fulfils the Authority's legal obligation under the *Local Government Act 2003* to have regard to the CIPFA Code.

Local Context

- 3.0 On 31st December 2019, the Authority held £491.5m of borrowing (£386.5m long term and £105m short term) and £86.3m of investments. This is set out in further detail at **Appendix B**. Forecast changes in these sums are shown in the balance sheet analysis in table 1 below.

Table 1: Balance sheet summary and forecast

£m	31.3.19 Actual	31.3.20 Forecast	31.3.21 Forecast	31.3.22 Forecast
General Fund CFR	527.1	588.3	686.7	809.7
HRA CFR	161.6	233.5	283.2	325.5
Total CFR	688.7	821.8	969.9	1,135.2
Existing Borrowing	396.3	369.8	341.1	316.1
Borrowing required to meet CFR	292.4	451.9	628.8	819.1
Projected Usable Reserves	368.4	289.8	341.5	350.1
Projected Working Capital	27.2	(20.0)	50.0	30.0
Available Cash Reserves	395.6	269.8	391.5	380.1
Investments (or New borrowing)	103.2	(182.2)	(237.3)	(439.0)

- 4.0 The Council's Capital Financing Requirement (CFR) is greater than its borrowing. This is because the Council has minimised its interest costs by utilising internal resources over the short term instead of undertaking more expensive external borrowing. However, the increased focus on capital investment to transform the financial position has reduced the Council's investments during 2019/20.
- 5.0 As demonstrated in the September 2018 Cabinet report "Brent Council Borrowing Strategy 2018/19 – 2020/21" the Council has a borrowing requirement during 2019/20. In recent years the Council's strategy has been to maintain borrowing at the lowest level possible unless interest rate prospects present a clear case for taking long term borrowing ahead of immediate requirements. However current interest rate forecasts along with the significant levels of planned and actual capital investment means that this approach is no longer sustainable or optimal.
- 6.0 CIPFA's *Prudential Code for Capital Finance in Local Authorities* recommends that the Authority's total debt should be lower than its highest forecast CFR over the next three years. Table 1 shows that the Authority expects to comply with this recommendation during 2020/21.

Borrowing Strategy

- 7.0 The Council currently holds £491.5m of loans, an increase of £95m on the previous year, due to the decrease in internal cash reserves and planned capital expenditure. The balance sheet forecast in table 1 shows that the Council expects to borrow up to £237m by 2020/21 however this is largely dependent on how the capital programme progresses. In accordance with the September 2018 strategy report the Council may also borrow additional sums to pre-fund future years' requirements, providing this does not exceed the authorised limit for borrowing of £1.2 billion.
- 8.0 **Objectives:** The Council's main objective when borrowing money is to strike an appropriately low risk balance between securing low interest costs and achieving certainty of those costs over the period for which funds are required. The flexibility to renegotiate loans should the Authority's long-term plans change is a secondary objective.
- 9.0 **Strategy:** Given the significant cuts to public expenditure and in particular to local government funding, the Council's borrowing strategy continues to address the key issue of affordability without compromising the longer-term stability of the debt portfolio. With short-term interest rates currently much lower than long-term rates, it is likely to be more cost effective in the short-term to either use internal resources, or to borrow short-term loans instead. By doing so, the Council is able to reduce net borrowing costs (despite foregone investment income) and reduce overall

treasury risk. The benefits of short term borrowing will be monitored regularly against the potential for incurring additional costs by deferring borrowing into future years when long-term borrowing rates are forecast to rise modestly. The cost of carry exercise which will evaluate the cost of borrowing now to borrowing in the future will determine whether the Council borrows additional sums at long-term fixed rates in 2020/21 with a view to keeping future interest costs low, even if this causes additional cost in the short-term.

- 10.0 The Council is also utilising forward starting loans during 2020/21, where the interest rate is fixed in advance, but the cash is received in later years. This would enable certainty of cost to be achieved without suffering a cost of carry in the intervening period.
- 11.0 In addition to above, the Authority may borrow short-term loans to cover temporary cash flow pressures.

Sources of borrowing: The approved sources of long-term and short-term borrowing are:

- Public Works Loan Board (PWLB) and any successor body
- any institution approved for investments (see below)
- any other bank or building society authorised to operate in the UK
- any other UK public sector body
- UK public and private sector pension funds (except the local Brent Pension Fund)
- capital market bond investors
- UK Municipal Bonds Agency plc and other special purpose companies created to enable local authority bond issues

- 12.0 **Other sources of debt finance:** In addition, capital finance may be raised by the following methods that are not borrowing, but may be classed as other debt liabilities:

- leasing
- hire purchase
- Private Finance Initiative
- sale and leaseback

- 13.0 The Council has previously raised the majority of its long-term borrowing from the PWLB but the government increased PWLB rates by 1% in October 2019 making it now a relatively expensive options. The Authority will now look to borrow any long-term loans from other sources including banks, pensions and local authorities, and will investigate the possibility of issuing bonds and similar instruments, in order to lower interest costs and reduce over-reliance on one source of funding in line with the CIPFA Code.

- 14.0 **Municipal Bonds Agency:** UK Municipal Bonds Agency plc was established in 2014 by the Local Government Association as an alternative to the PWLB. It plans to issue bonds on the capital markets and lend the proceeds to local authorities. The recent PWLB rate rise has boosted hopes that the UK Municipal Bonds Agency can finally issue its first bond. The MBA has failed to get its first bond off the ground since its launch more than five years ago, partly due to the low rates on offer to councils through the PWLB but also due to concerns around the joint and several liability that requires all members to collectively and individually guarantee the debt of each borrower. However, the 1% hike in the PWLB's borrowing rates has given fresh impetus to the agency's hopes of getting an issue off the ground and the MBA will be a core part of the councils borrowing strategy going forward.
- 15.0 **LOBOs:** The Council holds £70m of LOBO (Lender's Option Borrower's Option) loans where the lender has the option to propose an increase in the interest rate at set dates, following which the Authority has the option to either accept the new rate or to repay the loan at no additional cost. Although the Authority understands that lenders are unlikely to exercise their options in the current low interest rate environment, there remains an element of refinancing risk. The Authority will take the option to repay LOBO loans at no cost if it has the opportunity to do so.
- 16.0 **Short-term and variable rate loans:** These loans leave the Authority exposed to the risk of short-term interest rate rises and are therefore subject to the interest rate exposure limits in the treasury management indicators below.
- 17.0 **Debt rescheduling:** The PWLB allows authorities to repay loans before maturity and either pay a premium or receive a discount according to a set formula based on current interest rates. Other lenders may also be prepared to negotiate premature redemption terms. The Authority may take advantage of this and replace some loans with new loans, or repay loans without replacement, where this is expected to lead to an overall cost saving or a reduction in risk.

Investment Strategy

- 18.0 The Council holds invested funds, representing income received in advance of expenditure plus balances and reserves held. In the past 12 months, the Council's investment balance has ranged from £116m to £32m (a downward trend) due to capital expenditure utilising the Council's internal cash reserves. These balances are expected to remain low as the Council enters a borrowing period with cash available to invest for relatively short periods.
- 19.0 **Objectives:** The CIPFA Code requires the Council to invest its funds prudently, and to have regard to the security and liquidity of its investments before seeking the highest rate of return, or yield. The Council's objective when investing money is to strike an appropriate balance between risk and return, minimising the risk of incurring losses from defaults and the risk of receiving unsuitably low investment

income. Where balances are expected to be invested for more than one year, the Council will aim to achieve a total return that is equal or higher than the prevailing rate of inflation, in order to maintain the spending power of the sum invested.

- 20.0 **Negative interest rates:** If the UK enters into a recession in 2020/21, there is a small chance that the Bank of England could set its Bank Rate at or below zero, which is likely to feed through to negative interest rates on all low risk, short-term investment options. This situation already exists in many other European countries. In this event, security will be measured as receiving the contractually agreed amount at maturity, even though this may be less than the amount originally invested.
- 21.0 **Strategy:** Given the increasing risk and very low returns from short-term unsecured bank investments, the Council aims to diversify into higher yielding asset classes during 2020/21. This diversification will represent a continuation of the new strategy adopted in 2018/19. However, it is worth noting that this approach will be limited to the extent that this the capital investment plans are delivered in line with current expectations. Should this prove to be the case, surplus funds may not be available to invest over longer durations as set out below.
- 22.0 The average rate of interest received on short-term investments during the year to December 19 was 0.72%. Comparison data for other local authorities from Arlingclose's benchmarking club (which uses the data of 136 Local Authorities) places Brent around average compared to our peers - Appendix C. Due to the authorities borrowing requirement, there is unlikely to be scope to improve the short term investment returns achieved as liquidity of the surplus funds will play a key role.
- 23.0 The majority of the Council's surplus cash is currently invested short-term with other Local Authority's and money market funds. The Council will maintain a minimum investment balance of £10m to ensure the Council complies with the requirements to be a professional client under MIFID II regulations.
- 24.0 **Credit Rating:** The minimum credit rating for non-UK sovereigns will be set at AA+ (or equivalent) and the minimum long term rating for counterparties is A- (or equivalent). Within these criteria the Director of Finance will have discretion to accept or reject individual institutions as counterparties on the basis of any information which may become available.
- 25.0 The Council uses the lowest rating quoted by the main rating agencies, as recommended by CIPFA. Where instrument credit ratings are available, the instrument credit rating will be used if different from the counterparty rating. Credit ratings are monitored continually by the Council, using the advice of Arlingclose on ratings changes, and action taken as appropriate so an investment decision is not made solely based on credit ratings.

- 26.0 Any institution will be suspended or removed should any factors give rise to concern, and caution will be paramount in reaching any investment decision regardless of the counterparty or the circumstances. Should an entities credit rating be downgraded so that it does not meet the Council's approved criteria then:
- ☐ No new investments will be made;
 - ☐ Full consideration will be made to the recall or sale of existing investments with the affected counterparty.
- 27.0 Having an appropriate lending list of counterparties, remains critically important to protecting Brent's investments. A list of extremely secure counterparties would be very small, and the limits with each would be correspondingly high. This would expose the Council to a risk of an unlikely but potentially large loss. This arises because the arrangements for dealing with banks in difficulty now require a loss to be imposed on various categories of liabilities of the banks to allow the bank to recapitalise itself and continue in business (sometimes referred to as bail in).
- 28.0 When deteriorating financial market conditions affect the creditworthiness of all organisations, as happened in 2008 and 2011, this is not generally reflected in credit ratings, but can be seen in other market measures. In these circumstances, the Council will restrict its investments to those organisations of higher credit quality and reduce the maximum duration of its investments to maintain the required level of security. This will cause a reduction in the level of investment income earned, but will protect the principal sum invested.
- 29.0 **Unsecured deposits:** unsecured deposits with banks could be exposed to credit loss by the 'bail-in' process. This is where depositors are expected to make a significant contribution to recapitalise a bank that is failing or likely to fail before government support is provided and public money is invested in the organisation. There is no upper limit to the maximum credit loss that the authority could suffer in the event of a bail-in scenario. Investments in unsecured deposits will be limited to £20m.
- 30.0 **Secured deposits:** secured deposits of various kinds are not included in bail in provisions where investments are secured on the bank's assets. It is likely that the Council's preferred instruments in lending to institutions without some kind of government guarantee will increasingly be in the form of secured or marketable instruments. The Council and its advisors remain alert for signs of credit or market distress that might adversely affect the Council. Investments in secured deposits will be limited to £20m.
- 31.0 **Money market funds (MMFs):** will be utilised but good treasury management practice prevails, and whilst MMFs provide good diversification, the Council will also seek to mitigate operational risk by using at least two MMFs where practical.

They will not exceed 0.5% of the net asset value of the MMF. In addition, each Fund will be limited to a maximum deposit of £20m.

- 32.0 **Government:** Loans, bonds and bills issued or guaranteed by national governments, regional and local authorities and multilateral development banks. These investments are not subject to bail-in, and there is generally a lower risk of insolvency, although they are not zero risk. Investments with the UK Central Government may be made in unlimited amounts for up to 50 years.

The investment strategy will provide flexibility to invest cash for longer periods in order to access higher investment returns. The upper limit for lending beyond a year is £500m. In practice, lending for more than one year will be only to institutions of the highest credit quality and at rates which justify the liquidity risk involved. Marketable instruments may have longer maturities, though the maturity will be considered in conjunction with the likely liquidity of the market and credit quality of the institution. Other than UK Central Government the council may invest its surplus funds subject to a maximum duration of 30 years.

Alternative investment options will include:

- 33.0 **Corporate bonds:** These can give significantly higher yields than our current deposits but give exposure to risks from economic, commercial and operational difficulties. Diversification would involve investing small amounts with a large number of companies or buying diversified Funds. Seeking additional security could involve exchanging our deposit for known high credit quality assets, or a claim on a pool of assets. Seeking capital strength would involve investing in companies with high levels of assets in relation to liabilities or a strong fixed asset base, or whose business is not subject to market fluctuations in activity or profitability. Investment in corporate bonds will be limited to £20m in 2020/21.
- 34.0 **Registered Providers (Housing Associations and Registered Social Landlords):** Loans and bonds issued by RP's have been included as an approved investment counterparty for 2020/21. Any investments with Registered Providers will be analysed on an individual basis and discussed with Arlingclose prior to investing. Investments with registered providers will be limited to £20m in 2020/21 for up to 5 years.
- 35.0 **Collective Investment Schemes (Pooled Funds):** Shares or units in diversified investment vehicles consisting of the any of the above investment types, plus equity shares and property. The Council has evaluated the use of Pooled Funds and determined the appropriateness of their use within the investment portfolio. Pooled funds enable the Council to diversify the assets and the underlying risk in the investment portfolio and provide the potential for enhanced returns. Investments in pooled funds will be undertaken with advice from Arlingclose. Although considered as pooled funds, MMF's are discussed separately in paragraph 44. The Council currently has no investments in Pooled Funds (other

than MMFs) at present, but may make prudent use of them in the future. Investments in pooled funds will be limited to £20m in 2020/21.

- 36.0 **Real estate investment trusts:** Shares in companies that invest mainly in real estate and pay the majority of their rental income to investors in a similar manner to pooled property funds. As with property funds, REITs offer enhanced returns over the longer term, but are more volatile especially as the share price reflects changing demand for the shares as well as changes in the value of the underlying properties. The risk with any investments in REITs is that shares cannot be withdrawn but can be sold on the stock market to another investor which leaves the Council open to market risk. Investments in REITs will be limited to £20m in 2020/21.
- 37.0 **Operational bank accounts:** The Council may incur operational exposures, for example through current accounts, collection accounts and merchant acquiring services. These are not classed as investments, but are still subject to the risk of a bank bail-in, and balances will therefore be kept to a minimum. The Council banks with National Westminster Bank (NatWest) who meet the Council's minimum credit criteria. Should NatWest's creditworthiness deteriorate below the Council's minimum credit criteria, then as far as is consistent with operational efficiency, no money will be placed with NatWest and credit balances in the various Council accounts will be kept to a minimum level.
- 38.0 **Investment limits:** The Council's reserves available to cover investment losses are forecast to be £290m on 31st March 2020. In order that no more than 10% of available reserves will be put at risk in the case of a single default, the maximum that will be lent to any one organisation (other than the UK Government and Council subsidiaries) will be £20m. A group of banks under the same ownership will be treated as a single organisation for limit purposes.

Table 2: Investment Limits

	Credit Quality	Cash limit
Any single organisation, except the UK Central Government	A- Or equivalent	£20m
UK Government	Any	Unlimited for up to 50 years
Foreign countries	AA+ or equivalent	£20m per organisation
Registered providers and registered social landlords	A- Or equivalent	£20m per provider for up to 5 years
Loans to subsidiaries	n/a	£500m
Money market funds	A- Or equivalent	Lower of 5% of total net assets of the fund or £20m
Real estate investment trusts	A- Or equivalent	£20m
Corporate Bonds	A- Or equivalent	£20m

Any group of pooled funds under the same management	A- Or equivalent	£20m
Secured deposits	A- Or equivalent	£20m

- 39.0 **Liquidity management:** The Council uses internal purpose-built cash flow modelling tools to determine the maximum period for which funds may prudently be committed. The forecast is compiled on a prudent basis to minimise the risk of the Council being forced to borrow on unfavourable terms to meet its financial commitments. Limits on long-term investments are set by reference to the Council's medium-term financial plan and cash flow forecast.

TREASURY MANAGEMENT INDICATORS

- 40.0 The Council measures and manages its exposures to treasury management risks using the following indicators.
- 41.0 **Security:** The Council has adopted a voluntary measure of its exposure to credit risk by monitoring the value-weighted average credit rating of its investment portfolio. This is calculated by applying a score to each investment (AAA=1, AA+=2, etc.) and taking the arithmetic average, weighted by the size of each investment. Unrated investments are assigned a score based on their perceived risk.

Table 3: Credit risk indicator

Credit risk indicator	Target
Portfolio average credit rating	A

- 42.0 **Liquidity:** The Council has adopted a voluntary measure of its exposure to liquidity risk by monitoring the amount of cash available to meet unexpected payments within a rolling three month period, without additional borrowing.

Table 4: Liquidity risk indicator

Liquidity risk indicator	Target
Total cash available within 3 months	£20m

- 43.0 **Interest rate exposures:** This indicator is set to control the Council's exposure to interest rate risk. The upper limits on the one-year revenue impact of a 1% rise or fall in interest rates will be:

Table 5: Interest rate risk indicator

Interest rate risk indicator	Limit
Upper limit on one-year revenue impact of a 1% rise in interest rates	£5m

Upper limit on one-year revenue impact of a 1% fall in interest rates	£5m

The impact of a change in interest rates is calculated on the assumption that maturing loans and investments will be replaced at current rates.

- 44.0 **Maturity structure of borrowing:** This indicator is set to control the Council's exposure to refinancing risk. The upper and lower limits on the maturity structure of borrowing will be:

Table 6: Refinancing rate risk indicator

Refinancing rate risk indicator	Upper limit	Lower limit
Under 12 months	40%	0%
12 months and within 24 months	40%	0%
24 months and within 5 years	40%	0%
5 years and within 10 years	60%	0%
10 years and within 20 years	75%	0%
20 years and within 30 years	75%	0%
30 years and within 40 years	75%	0%
Over 40 years	75%	0%

Time periods start on the first day of each financial year. LOBOs are classified as maturing on the next call date i.e. the earliest date that the lender can require repayment.

- 45.0 **Principal sums invested for periods longer than a year:** The purpose of this indicator is to control the Council's exposure to the risk of incurring losses by seeking early repayment of its investments. The limits on the long-term principal sum invested to final maturities beyond the period end will be:

Table 7: Price risk indicator

Price risk indicator	2020/21	2021/22	2022/23
Limit on principal invested beyond year end	£500m	£550m	£600m

Related Matters

- 46.0 The CIPFA Code requires the Council to include the following in its treasury management strategy.

- 47.0 **Financial Derivatives:** Local authorities have previously made use of financial derivatives embedded into loans and investments both to reduce interest rate risk (e.g. interest rate collars and forward deals) and to reduce costs or increase income at the expense of greater risk (e.g. LOBO loans and callable deposits). The general power of competence in Section 1 of the Localism Act 2011 removes much of the uncertainty over local authorities' use of standalone financial derivatives (i.e. those that are not embedded into a loan or investment).
- 48.0 The Authority will only use standalone financial derivatives (such as swaps, forwards, futures and options) where they can be clearly demonstrated to reduce the overall level of the financial risks that the Authority is exposed to. Additional risks presented, such as credit exposure to derivative counterparties, will be taken into account when determining the overall level of risk. Embedded derivatives, including those present in pooled funds and forward starting transactions, will not be subject to this policy, although the risks they present will be managed in line with the overall treasury risk management strategy.
- 49.0 Financial derivative transactions may be arranged with any organisation that meets the approved investment criteria. The current value of any amount due from a derivative counterparty will count against the counterparty credit limit and the relevant foreign country limit.
- 50.0 In line with the CIPFA Code, the Authority will seek external advice and will consider that advice before entering into financial derivatives to ensure that it fully understands the implications.
- 51.0 **Housing Revenue Account:** As of 1 April 2012, the Council notionally split each of its existing long-term loans into General Fund and HRA pools. Individual loans or parts of loans have been allocated to the HRA, on the basis of achieving the same long term rate as that which applied to the General Fund at the self-financing date.
- 52.0 Differences between the value of the HRA loans pool and the HRA's underlying need to borrow results in a notional element of internal borrowing. This balance will be assessed over the year and interest charged to the HRA at an appropriate rate for short term borrowing. The HRA will also hold reserves and balances which will be invested with the Council, and interest will be paid on identified balances at a rate which recognises that any investment risk is borne by the General Fund.
- 53.0 **Markets in Financial Instruments Directive:** The MiFID II regulations took effect from January 2018 which saw the council reclassified as a retail client with the opportunity to opt up to professional client status. Retail clients have access increased protection however this would be balanced against potentially higher

fees and access to a more limited range of products. The council has opted up to professional client status with its providers of financial services, including advisors, banks, brokers and fund managers. The Director of Finance believes this to be the appropriate status for the Council's treasury management activities.

- 54.0 **Other Options Considered:** The CIPFA Code does not prescribe any particular treasury management strategy for local authorities to adopt. The Council believes that the above strategy represents an appropriate balance between risk management and cost effectiveness. Some alternative strategies, with their financial and risk management implications, are listed below.

Table 8: Alternative Strategies

Alternative	Impact on income and expenditure	Impact on risk management
Invest in a narrower range of counterparties and/or for shorter times	Interest income will be lower	Lower chance of losses from credit related defaults, but any such losses may be greater
Invest in a wider range of counterparties and/or for longer times	Interest income will be higher	Increased risk of losses from credit related defaults, but any such losses may be smaller
Borrow additional sums at long-term fixed interest rates	Debt interest costs will rise; this is unlikely to be offset by higher investment income	Higher investment balance leading to a higher impact in the event of a default; however long-term interest costs may be more certain
Borrow short-term or variable loans instead of long-term fixed rates	Debt interest costs will initially be lower	Increases in debt interest costs will be broadly offset by rising investment income in the medium term, but long-term costs may be less certain
Reduce level of borrowing	Saving on debt interest is likely to exceed lost investment income	Reduced investment balance leading to a lower impact in the event of a default; however long-term interest costs may be less certain

External Context

- 55.0 **Economic background:** The UK's progress negotiating its exit from the European Union, together with its future trading arrangements, will continue to be a major influence on the Authority's treasury management strategy for 2020/21. The General Election has removed some uncertainty within the market, however

following the expected Withdrawal Bill, uncertainties around the future trading relationship with the EU remain.

- 56.0 GDP growth rose by 0.4% in the third quarter of 2019 from -0.2% in the previous three months with the annual rate falling further below its trend rate to 1.1% from 1.2%. Services, construction and production added positively to growth, by 0.5%, 1.2% and 0.1% respectively, while agriculture recorded a fall of 0.1%. Looking ahead, the Bank of England's Monetary Policy Report (formerly the Quarterly Inflation Report) forecasts economic growth to pick up during 2020 as Brexit-related uncertainties dissipate and provide a boost to business investment helping GDP reach 1.6% in Q4 2020, 1.8% in Q4 2021 and 2.1% in Q4 2022.
- 57.0 The headline rate of UK Consumer Price Inflation remained the same in November 2019 at 1.5% year-on-year, the same as October 2019, however continuing to fall from highs of 2.1% in July and April 2019 as accommodation services and transport continued to contribute to a level of inflation below the BOE target of 2%. Labour market data continues to be positive. The ILO unemployment rate continues to hold at historic lows at 3.8%, its lowest level since 1975. The 3-month average annual growth rate for pay excluding bonuses rose to 3.5% in November 2019 providing some evidence that a shortage of labour is supporting wages. However, adjusting for inflation this means real wages were only up by 0.9% in October 2019 and only likely to have a moderate impact on household spending.
- 58.0 Domestic inflationary pressures have abated, as domestic gas and electricity price freezes have taken effect until 2020. The price of oil has fallen through the year, despite a rise in prices in December 2019. The limited inflationary pressure from real wages will likely keep inflation below the Bank of England target of 2%. The Bank of England maintained Bank Rate to 0.75% in November following a 7-2 vote by the Monetary Policy Committee. Despite keeping rates on hold, MPC members did confirm that if Brexit uncertainty drags on or global growth fails to recover, they are prepared to cut interest rates as required. Moreover, the downward revisions to some of the growth projections in the Monetary Policy Report suggest the Committee may now be less convinced of the need to increase rates even if there is a Brexit deal.
- 59.0 The US economy has continued to perform relatively well compared to other developed nations; however, the Federal Reserve has started to unwind its monetary tightening through 2019. The Federal Reserve has cut rates three times to 1.5% - 1.75%, to stimulate growth as GDP growth has started to fall (to 2.1%).
- 60.0 The fallout from the US-China trade war continues which, risks contributing to a slowdown in global economic activity in 2019. Recent suggestions have been an initial compromise and potential unwinding of tariffs; however, this can change quickly. Slow growth in Europe, combined with changes in leadership at the ECB

and IMF has led to a change of stance in 2019. Quantitative easing has continued and been extended.

- 61.0 **Credit outlook:** The recent Bank of England stress tests assessed all seven UK banking groups. The tests scenarios include deep simultaneous recessions in the UK and global economies that are more severe overall than the global financial crisis, combined with large falls in asset prices and a separate stress of misconduct costs. All seven banks passed the test on both a CET1 ratio and a leverage ratio basis. Major banks have steadily increased their capital for many years now. However, there are a number of shortcomings in the Bank's approach; timeliness as the results are over 11 months of out date when they are published, being based on end-2018 balance sheets; ringfencing, as the tests ignore the restrictions on transferring capital between ringfenced "retail" banks and non-ringfenced "investment" banks within the larger groups and; coverage – the tests should be expanded to cover a wider range of UK banks and building societies.
- 62.0 The Bank of England will seek to address some of these issues in 2020, when Virgin Money/Clydesdale will be added to the testing group and separate tests will be included of ringfenced banks.
- 63.0 Challenger banks hit the news headlines in 2019 with Metro Bank and TSB Bank both suffering adverse publicity and falling customer numbers.
- 64.0 Looking forward, the potential for a "no-deal" Brexit and/or a global recession remain the major risks facing banks and building societies in 2020/21 and a cautious approach to bank deposits remains advisable.
- 65.0 **Interest rate forecast:** The Authority's treasury management adviser Arlingclose is forecasting that Bank Rate will remain at 0.75% until the end of 2022. The risks to this forecast are deemed to be significantly weighted to the downside, particularly given the upcoming general election, the need for greater clarity on Brexit and the continuing global economic slowdown. The Bank of England, having previously indicated interest rates may need to rise if a Brexit agreement was reached, stated in its November Monetary Policy Report and its Bank Rate decision (7-2 vote to hold rates) that the MPC now believe this is less likely even in the event of a deal.
- 66.0 Gilt yields have risen but remain at low levels and only some very modest upward movement from current levels are expected based on Arlingclose's interest rate projections. The central case is for 10-year and 20-year gilt yields to rise to around 1.00% and 1.40% respectively over the time horizon, with broadly balanced risks to both the upside and downside. However, short-term volatility arising from both economic and political events over the period is a near certainty.

- 67.0 For the purpose of setting the budget, it has been assumed that new investments will be made at an average rate of 1%, and that new long-term loans will be borrowed at an average rate of 3%.

Appendix A – Arlingclose Economic & Interest Rate Forecast November 2019

Underlying assumptions:

- The global economy is entering a period of slower growth in response to political issues, primarily the trade policy stance of the US. The UK economy has displayed a marked slowdown in growth due to both Brexit uncertainty and the downturn in global activity. In response, global and UK interest rate expectations have eased.
- Some positivity on the trade negotiations between China and the US has prompted worst case economic scenarios to be pared back. However, information is limited, and upbeat expectations have been wrong before.
- Brexit has been delayed until 31 January 2020. While the General Election has maintained economic and political uncertainty, the opinion polls suggest the Conservative position in parliament may be strengthened, which reduces the chance of Brexit being further frustrated. A key concern is the limited transitional period following a January 2020 exit date, which will maintain and create additional uncertainty over the next few years.
- UK economic growth has stalled despite Q3 2019 GDP of 0.3%. Monthly figures indicate growth waned as the quarter progressed and survey data suggest falling household and business confidence. Both main political parties have promised substantial fiscal easing, which should help support growth.
- While the potential for divergent paths for UK monetary policy remain in the event of the General Election result, the weaker external environment severely limits potential upside movement in Bank Rate, while the slowing UK economy will place pressure on the MPC to loosen monetary policy. Indeed, two MPC members voted for an immediate cut in November 2019.
- Inflation is running below target at 1.7%. While the tight labour market risks medium-term domestically-driven inflationary pressure, slower global growth should reduce the prospect of externally driven pressure, although political turmoil could push up oil prices.
- Central bank actions and geopolitical risks will continue to produce significant volatility in financial markets, including bond markets.

Forecast:

- Although we have maintained our Bank Rate forecast at 0.75% for the foreseeable future, there are substantial risks to this forecast, dependant on General Election outcomes and the evolution of the global economy.
- Arlingclose judges that the risks are weighted to the downside.

- Gilt yields have risen but remain low due to the soft UK and global economic outlooks. US monetary policy and UK government spending will be key influences alongside UK monetary policy.
- We expect gilt yields to remain at relatively low levels for the foreseeable future and judge the risks to be broadly balanced.

	Dec-19	Mar-20	Jun-20	Sep-20	Dec-20	Mar-21	Jun-21	Sep-21	Dec-21	Mar-22	Jun-22	Sep-22	Dec-22	Average
Official Bank Rate														
Upside risk	0.00	0.00	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.21
Arlingclose Central Case	0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.75
Downside risk	-0.50	-0.75	-0.75	-0.75	-0.75	-0.75	-0.75	-0.75	-0.75	-0.75	-0.75	-0.75	-0.75	-0.73
3-month money market rate														
Upside risk	0.10	0.10	0.25	0.25	0.25	0.25	0.25	0.25	0.30	0.30	0.30	0.30	0.30	0.25
Arlingclose Central Case	0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.75
Downside risk	-0.50	-0.75	-0.75	-0.75	-0.75	-0.75	-0.75	-0.75	-0.75	-0.75	-0.75	-0.75	-0.75	-0.73
1yr money market rate														
Upside risk	0.10	0.20	0.20	0.20	0.20	0.20	0.20	0.25	0.30	0.30	0.30	0.30	0.30	0.23
Arlingclose Central Case	0.85	0.85	0.85	0.85	0.85	0.85	0.85	0.85	0.85	0.85	0.85	0.85	0.85	0.85
Downside risk	-0.30	-0.50	-0.55	-0.65	-0.65	-0.65	-0.65	-0.65	-0.65	-0.65	-0.65	-0.65	-0.65	-0.60
5yr gilt yield														
Upside risk	0.30	0.35	0.35	0.35	0.35	0.35	0.35	0.35	0.35	0.40	0.45	0.45	0.45	0.37
Arlingclose Central Case	0.50	0.50	0.50	0.55	0.60	0.60	0.60	0.60	0.60	0.60	0.60	0.60	0.60	0.57
Downside risk	-0.35	-0.50	-0.50	-0.55	-0.60	-0.60	-0.60	-0.60	-0.60	-0.60	-0.60	-0.60	-0.60	-0.56
10yr gilt yield														
Upside risk	0.30	0.30	0.35	0.35	0.35	0.35	0.35	0.35	0.35	0.40	0.40	0.45	0.45	0.37
Arlingclose Central Case	0.75	0.75	0.80	0.80	0.85	0.85	0.90	0.90	0.95	0.95	1.00	1.00	1.00	0.88
Downside risk	-0.40	-0.40	-0.40	-0.40	-0.45	-0.45	-0.45	-0.45	-0.50	-0.50	-0.50	-0.50	-0.50	-0.45
20yr gilt yield														
Upside risk	0.30	0.30	0.35	0.35	0.35	0.35	0.35	0.35	0.35	0.40	0.40	0.45	0.45	0.37
Arlingclose Central Case	1.20	1.20	1.25	1.25	1.25	1.30	1.30	1.30	1.35	1.35	1.35	1.40	1.40	1.30
Downside risk	-0.40	-0.40	-0.45	-0.45	-0.45	-0.45	-0.45	-0.45	-0.45	-0.45	-0.45	-0.50	-0.50	-0.45
50yr gilt yield														
Upside risk	0.30	0.30	0.35	0.35	0.35	0.35	0.35	0.35	0.35	0.40	0.40	0.45	0.45	0.37
Arlingclose Central Case	1.20	1.20	1.25	1.25	1.25	1.30	1.30	1.30	1.35	1.35	1.35	1.40	1.40	1.30
Downside risk	-0.40	-0.40	-0.45	-0.45	-0.45	-0.45	-0.45	-0.45	-0.45	-0.45	-0.45	-0.50	-0.50	-0.45

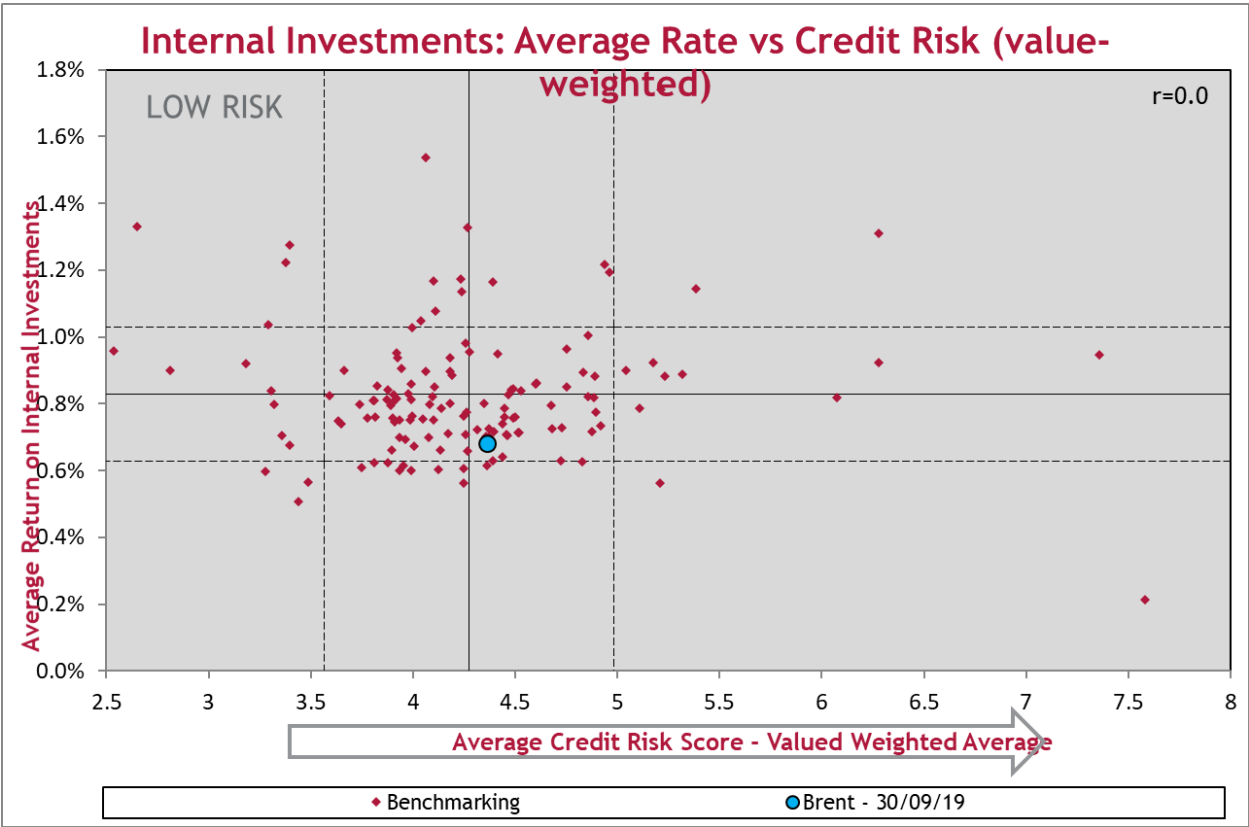
PWLB Certainty Rate (Maturity Loans) = Gilt yield + 1.80%

PWLB Local Infrastructure Rate (Maturity Loans) = Gilt yield + 0.60%

Appendix B – Existing Investment & Debt Portfolio Position

	31/12/19 Actual Portfolio £m	31/12/19 Average Rate %
External borrowing:		
Public Works Loan Board	301.0	4.9
Local authorities	105.0	0.9
LOBO loans from banks	70.5	4.8
Other loans	15.0	4.3
Total external borrowing	491.5	3.7
Other long-term liabilities:		
Private Finance Initiative	23.6	
Finance Leases	5.2	
Transferred Debt	0.0	
Total other long-term liabilities	28.8	
Total gross external debt	520.3	
Treasury investments:		
Banks & building societies (unsecured)	0.2	0.0
Government (incl. local authorities)	5.0	0.8
Money Market Funds	81.3	0.7
Total treasury investments	86.5	0.7
Net debt	433.8	

Appendix C – Internal Investments: Average Rate vs Credit Risk



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Minimum Revenue Provision – 2020/21

- 1.1. The council is required to pay off an element of the accumulated General Fund capital spend financed by borrowing each year through a revenue charge (the Minimum Revenue Provision), although it is also allowed to undertake additional voluntary payments where it is seen to be in its best interests to do so. Regulations have been issued by the Ministry of Housing Communities and Local Government (MHCLG) which require full Council (or a delegated body) to approve an MRP policy statement in advance of financial each year.
- 1.2. In accordance with the current regulations for the calculation of MRP the following policy for non-HRA assets has been applied:
 - 1.2.1. For supported borrowing, the Council will use the asset life method (Option 3) and an 'annuity' approach for calculating repayments. Based on the useful economic lives of the council's assets a single annuity has been calculated, which results in the outstanding principal being repaid over the course of one hundred years.
 - 1.2.2. For prudential borrowing, the Council will adopt Option 3, 'the asset life method', and an 'annuity' approach for calculating repayments. This option allows provision for repayment of principal to be made over the estimated life of the asset. The use of the 'annuity' method is akin to a mortgage where the combined sum of principal and interest are equalised over the life of the asset.
 - 1.2.3. In line with the statutory guidance MRP will be charged for finance leases at a rate equal to the writing down of the lease liability.
 - 1.2.4. MRP will include a charge equal to any capital lifecycle additions within the lease.
 - 1.2.5. Where borrowing is undertaken for the construction of new assets, MRP will only become chargeable once such assets are completed and operational.
 - 1.2.6. The Council reserve the right to charge a £nil MRP where the conditions set out in paragraph 26 of the statutory guidance have been met.
- 1.3. The asset lives which will be applied to different classes of assets are as shown in table 1, however the Council reserves the right to determine useful life periods and prudent MRP in exceptional circumstances where the recommendations of the guidance would not be appropriate.

Table 1

Asset Type	Years
Vehicles and equipment	5 to 15 years
Capital repairs to roads and buildings	15 to 25 years
Purchase of buildings	30 to 40 years
New construction	40 to 60 years
Purchase of land	50 to 100 years

ADVICE FROM THE DIRECTOR OF LEGAL, HR AUDIT AND INVESTIGATIONS

1. INTRODUCTION

This appendix sets out in some detail Members' individual responsibilities to set a legal budget and how Members should approach the task. It also reminds Members about the rules concerning pecuniary and other interests.

2. WHEN THE BUDGET MUST BE SET

Under Section 31A of the Local Government Finance Act 1992, budget calculations have to be made before 11th March, but they are not invalid merely because they are made on or after 11th March. However, delay in setting the Council Tax will have very serious financial consequences. It will render the Council vulnerable to legal proceedings requiring it to set the tax. In any event, it is important that the tax is set well in advance of 1st April as no sum is payable for Council Tax until 14 days after the date of posting bills. Serious financial losses will accrue very soon from a late setting of Council Tax as income is delayed and interest is foregone.

An important feature of Council Tax is that the statutory budget calculation must be followed exactly. If not the Council Tax resolution will be invalid and void.

3. SETTING OF THE COUNCIL TAX

Section 30 of the Local Government Finance Act (the Act) provides that no amount of council tax may be set before the earlier of the following—

- (a) 1st March in the financial year preceding that for which the amount is set;
- (b) the date of the issue to the authority of the last precept capable of being issued to it (otherwise than by way of substitute) by a major precepting authority for the financial year for which the amount is set.

Although the council can calculate the Brent element of the council tax at its meeting on 19th February, it cannot set the council tax on that date as the GLA precept will not be issued until after the GLA meeting on 24th February 2020,

Section 67 of the Act permits the setting of the council to be delegated to a special council tax setting committee established under that section. It is therefore proposed that a committee under this section be established and appointed to at the council's meeting on 19th February 2020.

4. NOTICE

There is a requirement to publish notice of the amount set for Council Tax in at least one local paper within 21 days of the Council's decision under section 38(2) of the Local Government and Finance Act 1992. There is also a duty to

consult with representatives of Non-Domestic Ratepayers about the proposed revenue and capital expenditure before the budget requirement is calculated under section 65 of the Local Government and Finance Act 1992.

5. MEMBERS' FIDUCIARY DUTIES

The obligation to make a lawful budget each year is shared equally by each individual Member. In discharging that obligation, Members owe a fiduciary duty to the Council Taxpayer.

The budget must not include expenditure on items which would fall outside the Council's powers. Expenditure on lawful items must be prudent, and any forecasts or assumptions such as rates of interest or inflation must themselves be rational. Power to spend money must be exercised bona fide for the purpose for which they were conferred and any ulterior motives risk a finding of illegality. In determining the Council's overall budget requirement, Members are bound to have regard to the level of Council Tax necessary to sustain it. Essentially the interests of the Council Taxpayer must be balanced against those of the various service recipients.

Within this overall framework, there is of course considerable scope for discretion within the 2018/19 financial year, especially on the part of the Cabinet. Setting a budget is not the same as deciding what expenditure will in fact be incurred. To budget for expenditure is to estimate likely expenditure and/or make financial provision for such expenditure. However, Members will bear in mind that in making the budget commitments are being entered which will have an impact on future years. Some such commitments are susceptible to change in future years, such as staff numbers which are capable of upward or downward adjustment at any time. Other commitments however impose upon the Council future obligations which are binding and cannot be adjusted, such as loan charges to pay for capital schemes. For some specific proposals within the overall Budgetary framework, Cabinet decisions have already been made. For some other proposals, subject to relevant consultation where necessary, decisions by the Cabinet will need to be made, especially where the making of such a decision would result or would be likely to result in the permanent closure of a facility used by the public or a permanent and significant reduction in the level of services or facilities provided to the public other than where such closure or reduction in service is considered necessary by the relevant strategic director for reasons of health and safety.

In making those subsequent decisions the Cabinet will be required to consider all relevant matters including the results of any consultation and the Council's equality duties. This will include that should the Cabinet (or other decision maker) consider it appropriate, for example when being asked to make service changes to achieve a budget reduction and having taken into account all relevant facts (including but not limited to the results of any consultation and after due consideration of the Council's equalities duties) they have the option of not making the budget reductions detailed within the overall budget. They will still be required to balance the budget overall using the appropriate

constitutional procedures, for example, finding the savings from elsewhere or using reserves and otherwise complying with the Council's rules on budget setting and management.

Only relevant and lawful factors may be taken into account and irrelevant factors must be ignored. A Member who votes in accordance with the decision of his or her political group but who does so after taking into account the relevant factors and professional advice will be acting within the law. Party loyalty and party policy are capable of being relevant considerations for the individual Member provided the member does not dogmatically toe the party line without considering the relevant factors and professional advice and without properly exercising any real discretion.

Under the Brent Member Code of Conduct members are required when reaching decisions to have regard to relevant advice from the Director of Finance and the Monitoring Officer (the Director of Legal, HR, Audit and Investigations). If the Council should fail to set a budget at all or fail to set a lawful budget, contrary to the advice of these two officers there may be a breach of the Code by individual members if it can be demonstrated that they have not had proper regard to the advice given.

6. ARREARS OF COUNCIL TAX AND VOTING

In accordance with section 106 of the Local Government Finance Act 1992 ("the 1992 Act"), where a payment of Council Tax that a member is liable to make has been outstanding for two months or more at the time of a meeting, the Member must disclose the fact of their arrears (though they are not required to declare the amount) and cannot vote on any of the following matters if they are the subject of consideration at a meeting:

- (a) Any decision relating to the administration or enforcement of Council Tax.
- (b) Any budget calculation required by the Local Government Finance Act 1992 underlying the setting of the Council Tax.
- (c) Any recommendation, resolution or other decision which might affect the making of the Annual Budget calculation.

Members should note the following points:

- (i) These rules are extremely wide in scope. Virtually any Council decision which has financial implications is one which might affect the making of the budget underlying the Council Tax for next year and thus is caught. The former DoE (now MHCLG) shared this interpretation as it made clear in its letter to the AMA dated 28th May 1992.
- (ii) The rules do not apply just to full Council meetings but extend to committees and sub-committees of the Council and to the Cabinet and its Highways Committee.
- (iii) Members who make a declaration are not entitled to vote on the matter in question but are not prevented by the section from taking part in the discussion.

Appendix K

- (iv) Members will have a defence under section 106 of the 1992 Act if they did not know that the section applied to them (i.e., that they were in arrears to the relevant extent) at the time of the meeting. Thus unwitting Members who for example can prove that they did not know and had no reason to suppose at the time of the meeting that their bank has failed to honour a standing order will be protected should any prosecution arise.
- (v) It is not enough to state that a benefit application has been submitted which has not yet been determined, as Members remain liable to pay pending determination.
- (vi) Breach of the rules is a criminal offence under section 106 of the 1992 Act which attracts a maximum fine of £1,000.

Members' attention is also be drawn to the effect of the Local Authorities (Standing Orders)(England)(Amendment) Regulations 2014 which came into effect on 25 February 2014 which is that where any vote is taken at a Council meeting on setting the budget for the authority, the Minutes of the meeting will record the names of all Councillors present at the vote and how each Councillor voted (for or against) or the fact that they abstained from voting.

7. DISCLOSABLE PECUNIARY INTERESTS

Members are reminded to consider whether they have a disclosable pecuniary interest or a personal interest in the setting of the council's budget. If a member has a relevant interest they must disclose the interest at the meeting, subject to the provisions in the Code in respect of sensitive interests. If the interest is:

- a disclosable pecuniary interest; or
- a personal interest which a member of the public knowing the facts would reasonably regard it as so significant that it is likely to prejudice their judgement of the public interest (and it affects their financial position or the financial position of a connected person (as defined in the Code) or relates to a regulatory matter affecting or likely to affect them or a connected person.

the member may not participate in the discussions or vote on the matter, although if the interest is prejudicial but not a disclosable pecuniary interest, the member may remain for the purposes of making representations or asking questions.

Members should seek early advice to avoid any confusion on the night of the meeting if they consider they have a relevant interest.

Dispensations

The Council's Monitoring Officer may, on written request from a Member, grant a dispensation to relieve the applicant from the restrictions on participation and voting. Dispensation may be granted if:-

Appendix K

- Without the dispensation the number of persons prohibited from participating would be so great a proportion to impede the effectiveness of the meeting;
- The representation of different political groups would be affected and likely to alter the likely outcome of any voting at the meeting;
- Granting the dispensation is in the interests of persons living in the Borough;
- Every Member of the Council's Cabinet would be precluded from participating in the meeting;
- It is appropriate to grant a dispensation.

Dispensation may be granted for up to 4 years. A dispensation will mean that the Member to whom it is granted can speak and vote on a matter in which they have a relevant interest. Where the Monitoring Officer is undecided on the best response, and time is not of the essence, the decision could be passed to Standards Committee for decision and there is no Standards Committee meeting currently fixed before the budget setting meeting.

8. RESPONSIBILITIES OF THE DIRECTOR OF FINANCE AND AUDITORS' POWERS

Director of Finance and Monitoring Officer

Section 114 of the Local Government Finance Act 1988 places the Director of Finance under an obligation to prepare a report (to full Council) if it appears to him that the expenditure the Authority proposes to incur in a financial year is likely to exceed its resources available to meet that expenditure. A failure to take note and act on such a report could lead to a complaint to the Standards Board. Similarly, the Council's Monitoring Officer is required to report to Full Council if it appears to her that a decision has been or is about to be taken which is or would be unlawful or would be likely to lead to maladministration.

Under section 25 of the Local Government Act 2003 the Director of Finance is required to report to the authority on the robustness of the estimates made for the purposes of the calculations required to be made by the Council and the adequacy of the proposed financial reserves. These are the estimates which the Cabinet is required to determine and submit to Full Council and are contained within this report. However, if the Council were minded to agree a budget based on different estimates e.g. if Council did not agree with the estimates provided by the Cabinet then those estimates which the Council would adopt would effectively become 'the estimates' for the purpose of Section 25 and as such should be subject to a report by the Director of Finance.

External Auditors' Powers

Section 91 of the Local Government Act 2000 and section 19A of the Audit Commission Act 1998 provide that an External Auditor may issue an "Advisory Notice" if he has reason to believe that an Authority is about to take a course of action which, if pursued to its conclusion, would be unlawful and likely to cause a loss or deficiency. This power is to be used where the matter is significant either in amount or in principle or both.

While the advisory notice has effect it is not lawful for the authority to implement or take the course of action in question unless it has considered the issues raised in the notice and given the auditor notice that it intends to proceed with that course of action in a specified period and that period has expired.

In addition, it is also open to the Auditor to apply for judicial review on any decision of an Authority or failure to act which it is reasonable to believe would have an effect on the accounts of an Authority.

9. SPECIFIC BUDGET ADVICE

Balances and Other Budget Calculations

A local authority must budget so as to give a reasonable degree of certainty as to the maintenance of its services. In particular, local authorities are required by section 31A(2)(b) and (c) of the Local Government Finance Act 1992 to calculate as part of their overall budget what amounts are appropriate for contingencies and reserves. The Council faces various contingent liabilities set out in the main budget report. Furthermore, the Council must ensure sufficient flexibility to avoid going into deficit at any point during the financial year. Members will need to pay careful attention to the advice of officers here. As set out previously, under section 25 of the Local Government Act 2003 the Director of Finance is required to report to the authority on the adequacy of the proposed financial reserves.

In addition to advising on the robustness of the estimates as set out above, the Director of Finance is also required to report on the robustness of the proposed financial reserves. The same advice applies to these as to the other calculations required to be made by the Council.

Having considered the officer's report the Council is then required to "*have regard to the report*" but it is not required to adopt the recommendations in it. However, Members must demonstrate they have acted reasonably if they do not adopt the recommendations.

Localism Act 2011

Sections 72 to 79 and Schedules 5 to 7 of the Localism Act 2011 amended the legislation regarding the calculation of council tax. Schedule 5 of the Localism Act provides for a council tax referendum to be held if an authority increases its relevant basic amount of council tax in excess of principles determined by the Secretary of State. Authorities will not be able to exceed the Secretary of State's principles without having held such a referendum. The principles applicable for 2020/21 are discussed at paragraphs 5.7 to 5.8 of the main report.

Alternative Proposals

If alternative proposals to those contained in this report are moved at the budget setting meeting, the Director of Finance will need to consider if the estimates or proposed financial reserves contained in this report are affected and whether a further report (which may be oral) is required under section 25 of the Local Government Act 2003. If the Director of Finance is unable to report on the estimates or the reserves because of the lateness of the alternative proposals then he will not be able to comply with this statutory requirement. The Act does not say what happens if this duty is not fulfilled and nor does it say whether the Council can set the budget without that advice. It follows from this then that there is no express statutory prohibition. However, the authority is at risk of a Judicial Review by an interested person, e.g. a resident, if the Council has failed to have regard to a report of the Director of Finance on the estimates and reserves used for its budget calculations.

Capital Programme

The requirements of the “*Prudential Code*” established in the Local Government Act 2003 are set out in the report.

In setting and preparing the capital budgets the Council is required to “have regard” to various primary legislation, regulation and professional standards produced periodically by MHCLG and CIPFA.

Codes of Practice and Regulations

The Prudential Code for Capital Finance in Local Authorities

A professional code of practice to help Councils govern capital investment decisions by providing a framework to support Councils and help them show effective control levels of decisions relating to capital investment activity, including borrowing. This includes Indicators to demonstrate affordability and sustainability. The Code requires all local authorities to draw up rolling three-year plans for capital expenditure.

Local Government Act 2003

Under part 1 chapter 1 of the Local Government Act 2003 (“LGA”), a local authority may borrow for any purpose relevant to its functions or for “the prudent management of its financial affairs”. The LGA is supported by The Local Authorities (Capital Finance and Accounting) (England) Regulations 2003 (SI 2003/3146), as amended. The legislation provides a framework that encourages investment in the capital assets that local government needs to improve services and relies on accounting concepts, plus professional and self-regulation. It allows local authorities to raise finance for capital expenditure,

Appendix K

without government consent, where they can afford to service the debt without extra government support.

Each authority must set a total borrowing limit for itself in accordance with the principles of the Prudential Code. The borrowing should be related to the revenue streams available to the local authority, with which it can repay the debt.

The total amount that a local authority may borrow is governed by the requirements of CIPFA's Prudential Code for Capital Finance in Local Authorities; and by the Local Authorities (Capital Finance and Accounting) (England) Regulations 2003 (SI 2003/3146), as amended.

Legal advice will be provided as needed on projects within the Council's Capital Programme as they progress.

Expenditure Charged to the Housing Revenue Account

Members will be aware that the Housing Revenue Account (HRA) is by law to be maintained separately from the General Fund and there are strict rules which determine to which account any expenditure must be charged. There are only very limited areas of discretion here. Members should bear in mind that if they wished to review any current determination which affects the apportionment of charges between the General Fund and HRA, they would need to do so on the basis of an officers' report and specific legal advice. The Housing Revenue Account must be maintained in balance throughout the year and the Council is under a duty to prevent a debit balance in the Housing Revenue Account pursuant to Section 76 Local Government and Housing Act 1989.

Equalities Legislation

Section 149 of the Equality Act 2010 sets out the public sector equality duty which requires the Council, when exercising its functions to have 'due regard' to the need to eliminate discrimination (both direct and indirect discrimination), harassment and victimization and other conduct prohibited under the Equality Act, and to advance equality of opportunity and foster good relations between those who share a 'protected characteristic' and those who do not share that protected characteristic.

A 'protected characteristic' is defined in the Equality Act as:

- age;
- disability;
- gender reassignment;
- pregnancy and maternity;
- race; (including ethnic or national origins, colour or nationality)
- religion or belief;
- sex;
- sexual orientation.

Appendix K

Marriage and civil partnership are also a protected characteristic for the purposes of the duty to eliminate discrimination.

Having due regard to the need to 'advance equality of opportunity' between those who share a protected characteristic and those who do not, includes having due regard to the need to remove or minimize disadvantages suffered by them. Due regard must also be had to the need to take steps to meet the needs of such persons where those needs are different from persons who do not have that characteristic, and encourage those who have a protected characteristic to participate in public life.

Complying with the duty may involve treating some people better than others, as far as that is allowed by the discrimination law.

Due regard to the need to eliminate discrimination, advance equality, and foster good relations must form an integral part of the decision making process. The Council must consider the effect that implementing a particular policy will have in relation to equality before making a decision.

There is no prescribed manner in which the equality duty must be exercised. However, the council must have an adequate evidence base for its decision making. This can be achieved by gathering details and statistics on who use the facilities. A careful consideration of this assessment is one of the key ways in which the Council can show "due regard" to the relevant matters. Where it is apparent from the analysis of the information that the proposals would have an adverse effect on equality then adjustments should be made to avoid that effect (mitigation).

The duty is not to achieve the objectives or take the steps set out in s.149. Rather, the duty on public authorities is to bring these important objectives relating to discrimination into consideration when carrying out its functions. "Due regard" means the regard that is appropriate in all the particular circumstances in which the authority is carrying out its functions.

There must be a proper regard for the goals set out in s.149. At the same time, the council must also pay regard to any countervailing factors, which it is proper and reasonable for them to consider. Budgetary pressures, economics and practical factors will often be important. The weight of these countervailing factors in the decision making process is a matter for the Council.

The equality and diversity implications of budget proposals are considered at all stages of the budget process, from the development of the initial budget strategy, through consideration of individual growth and savings proposals, to the production of service development plans. The processes in place are therefore aimed at ensuring that the budget proposals in this report do not discriminate against communities or individuals because of age, ethnicity, gender, disability, religion, or sexual orientation, and support the council in meeting its other duties to promote equal opportunities and good race relations.

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Appendix L (i) Fees and Charges Explanatory Note

By using its powers to charge for goods and services, the Council is able to generate additional income to support investment in services and/or reduce the overall level of expenditure to be met by local tax payers.

In using these powers however, the Council will wish to take care to ensure that the consequences of charging on individuals, the wider aims of the Council itself and / or organisations do not adversely impact on those who are vulnerable or in difficulties.

The overriding aim of the charging policy (set out in Appendix L (iii)) is to maximise income generation and collection to enhance the social and economic well-being of the community the council serves, whilst ensuring a fair price for all services reflecting the ability of the community to pay and the relative demand for the service. Maximisation of income, following a decision to charge, is also dependent on a charge being raised and that amount being collected, both in a timely way.

In February 2017, Cabinet agreed an overall policy to amend fees and charges. This policy was produced so that managers, through delegated powers, had greater flexibility and control in optimising commercial returns.

The charges shown in Appendix L (ii) have been reviewed to either bring them to a cost recovery position, reflect the inflationary pressures particular services are subject to and / or bring them in line with the wider market for individual services where appropriate.

An independent review of fees and charges has also been commissioned to benchmark Brent's fees and charges against neighbouring local authorities. The main aims of this review are to

- (i) identify services that the Council currently doesn't charge for but other local authorities do and
- (ii) understand how Brent's charges compare to other local authorities.

Decisions on whether to make changes to Brent's fees and charges as a result of the review will be made on a case by case basis in consultation with the relevant Lead Member.

The full schedule of proposed fees and charges for 2020/21 is set out in Appendix L (ii)

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Appendix L(ii) – Fees & Charges Schedule

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DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	19/20 CHARGE £ (Excl. VAT)	20/21 PROPOSED CHARGES £ (Excl. VAT)
COMMUNITY & WELLBEING	Private Housing Services			
COMMUNITY & WELLBEING	Private Housing Services	Houses in Multiple Occupation Mandatory licences	840.00	840.00
COMMUNITY & WELLBEING	Private Housing Services	Houses in Multiple Occupation Additional licences	840.00	840.00
COMMUNITY & WELLBEING	Private Housing Services	Other Houses Selective licences	540.00	540.00
COMMUNITY & WELLBEING	Private Housing Services	Admin charge for Work in Default	100.00	100.00
COMMUNITY & WELLBEING	Private Housing Services	Notices	330.00	330.00
COMMUNITY & WELLBEING	Private Housing Services	Specifications for Empty Property Grant	550.00	550.00
COMMUNITY & WELLBEING	Private Housing Services	DFG and SWG Agency Service	16.5% of cost of works or minimum of £66	16.5% of cost of works or minimum of £66
COMMUNITY & WELLBEING	Libraries			
COMMUNITY & WELLBEING	Libraries	Reservations - If an item is not on the catalogue and has to be ordered	3.00	3.00
COMMUNITY & WELLBEING	Libraries	Audio Visual loans	2.00	2.00
COMMUNITY & WELLBEING	Libraries	Overdue charges on items returned late	0.30	0.30
COMMUNITY & WELLBEING	Libraries	Printing and photocopying charges	0.30	0.30
COMMUNITY & WELLBEING	Libraries	Reserved book from the British Library	10.00	17.20
COMMUNITY & WELLBEING	The Library at Willesden Green	Education Room - per hour commercial hire charges	30.00	30.00
COMMUNITY & WELLBEING	The Library at Willesden Green	Performance Space- per hour commercial hire charges	50.00	50.00
COMMUNITY & WELLBEING	The Library at Willesden Green	Reading Room- per hour commercial hire charges	30.00	30.00
COMMUNITY & WELLBEING	The Library at Willesden Green	Education Room - per hour concessionary hire charges	18.00	18.00
COMMUNITY & WELLBEING	The Library at Willesden Green	Performance Space- per hour concessionary hire charges	25.00	25.00
COMMUNITY & WELLBEING	The Library at Willesden Green	Reading Room- per hour concessionary hire charges	18.00	18.00
COMMUNITY & WELLBEING	Culture, Sports and Recreation			
COMMUNITY & WELLBEING	Sports	B.Active card (Resident standard card)	41.00	41.00
COMMUNITY & WELLBEING	Sports	B.Active card (Non resident standard card)	72.00	72.00
COMMUNITY & WELLBEING	Sports	B.Active card (60+ or disabled resident Concession)	6.75	6.75

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	19/20 CHARGE £ (Excl. VAT)	20/21 PROPOSED CHARGES £ (Excl. VAT)
COMMUNITY & WELLBEING	Sports	B.Active card (Resident Concession - 6 months)	3.50	3.50
COMMUNITY & WELLBEING	Culture, Sports and Recreation	Sports Hall Hire - Peak	60.00	60.00
COMMUNITY & WELLBEING	Bridge Park Sports Centre	Sports Hall Hire - Juniors Peak	45.00	45.00
COMMUNITY & WELLBEING	Bridge Park Sports Centre	Sports Hall Hire - Off Peak	36.00	36.00
COMMUNITY & WELLBEING	Bridge Park Sports Centre	Sports Hall Hire - Juniors Off Peak	27.00	27.00
COMMUNITY & WELLBEING	Culture, Sports and Recreation	Dance Studio Peak	40.00	40.00
COMMUNITY & WELLBEING	Bridge Park Sports Centre	Dance Studio - Off Peak	24.00	24.00
COMMUNITY & WELLBEING	Culture, Sports and Recreation	Badminton Court Peak	11.00	11.00
COMMUNITY & WELLBEING	Bridge Park Sports Centre	Badminton Court - Off Peak	7.00	7.00
COMMUNITY & WELLBEING	Culture, Sports and Recreation	Table Tennis Peak	6.30	6.30
COMMUNITY & WELLBEING	Bridge Park Sports Centre	Table Tennis - Off Peak	4.00	4.00
COMMUNITY & WELLBEING	Culture, Sports and Recreation	Gym Membership	26.00	26.00
COMMUNITY & WELLBEING	Culture, Sports and Recreation	Gym Membership - Joint	43.00	43.00
COMMUNITY & WELLBEING	Culture, Sports and Recreation	Gym Membership - Annual	256.00	256.00
COMMUNITY & WELLBEING	Bridge Park Sports Centre	Gym Membership - concessions	21.00	21.00
COMMUNITY & WELLBEING	Bridge Park Sports Centre	Gym Membership - off peak use	19.00	19.00
COMMUNITY & WELLBEING	Bridge Park Sports Centre	Gym Membership - corporate	24.00	24.00
COMMUNITY & WELLBEING	Bridge Park Sports Centre	Gym Membership - Junior	16.00	16.00
COMMUNITY & WELLBEING	Bridge Park Sports Centre	Gym Induction - Adults	19.50	19.50
COMMUNITY & WELLBEING	Bridge Park Sports Centre	Gym Induction - Youth 14-16	6.00	6.00
COMMUNITY & WELLBEING	Culture, Sports and Recreation	Gym casual use - Adults Peak	6.70	6.70
COMMUNITY & WELLBEING	Bridge Park Sports Centre	Gym casual use - Adults Off Peak	4.00	4.00
COMMUNITY & WELLBEING	Bridge Park Sports Centre	Gym casual use - Youth 14-16	3.10	3.10
COMMUNITY & WELLBEING	Culture, Sports and Recreation	Sauna and Steam - Peak	7.00	7.00

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	19/20 CHARGE £ (Excl. VAT)	20/21 PROPOSED CHARGES £ (Excl. VAT)
COMMUNITY & WELLBEING	Culture, Sports and Recreation	Sauna and Steam - Off Peak	5.30	5.30
COMMUNITY & WELLBEING	Culture, Sports and Recreation	Parties	110.00	110.00
COMMUNITY & WELLBEING	Bridge Park Sports Centre	Junior Crs/session	3.80	3.80
COMMUNITY & WELLBEING	Culture, Sports and Recreation	Boardroom - Full Day	69.00	69.00
COMMUNITY & WELLBEING	Culture, Sports and Recreation	Community Suite - Full Day	139.90	139.90
COMMUNITY & WELLBEING	Culture, Sports and Recreation	Tropics Suite - Full Day	209.00	209.00
COMMUNITY & WELLBEING	Culture, Sports and Recreation	Syndicate Room - Full Day	258.00	258.00
COMMUNITY & WELLBEING	Culture, Sports and Recreation	Conference Room - Full Day	404.00	250.00
COMMUNITY & WELLBEING	Culture, Sports and Recreation	Function Hall - Full Day	800.00	300.00
COMMUNITY & WELLBEING	Culture, Sports and Recreation	Sports hall - Full Day	1,900.00	1,900.00
COMMUNITY & WELLBEING	Culture, Sports and Recreation	Boardroom - Per Hour	12.00	From 12.00
COMMUNITY & WELLBEING	Culture, Sports and Recreation	Community Suite - Per Hour	24.00	From 24.00
COMMUNITY & WELLBEING	Culture, Sports and Recreation	Tropics Suite - Per Hour	35.00	From 35.00
COMMUNITY & WELLBEING	Culture, Sports and Recreation	Syndicate Room - Per Hour	43.00	43.00
COMMUNITY & WELLBEING	Culture, Sports and Recreation	Conference Room - Per Hour	68.00	65.00
COMMUNITY & WELLBEING	Culture, Sports and Recreation	Function Hall - Per Hour	90.00	From 45.00
COMMUNITY & WELLBEING	Bridge Park Room Hire	Kitchen	420.00	420.00
COMMUNITY & WELLBEING	Bridge Park Room Hire	Servery	265.00	265.00
CHILDREN & YOUNG PEOPLE	Early Help			
CHILDREN & YOUNG PEOPLE	Early Help	Childcare Nursery places (Willows Nursery)	220.00	220.00
CHILDREN & YOUNG PEOPLE	Early Help	Childcare Nursery places (Willows Nursery)	165.00	165.00
CHILDREN & YOUNG PEOPLE	Early Help	Childcare Nursery places (Willows Nursery)	275.00	275.00
CHILDREN & YOUNG PEOPLE	Early Help	Childcare Nursery places (Willows Nursery)	192.50	192.50
CHILDREN & YOUNG PEOPLE	Early Help	Childcare Nursery places (Willows Nursery)	165.00	165.00

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	19/20 CHARGE £ (Excl. VAT)	20/21 PROPOSED CHARGES £ (Excl. VAT)
CHILDREN & YOUNG PEOPLE	Early Help	Childcare Nursery places (Willows Nursery)	247.50	247.50
CHILDREN & YOUNG PEOPLE	Early Help	Childcare Nursery places (Willows Nursery)	192.50	192.50
CHILDREN & YOUNG PEOPLE	Early Help	Childcare Nursery places (Willows Nursery)	148.50	148.50
CHILDREN & YOUNG PEOPLE	Early Help	Childcare Nursery places (Willows Nursery)	220.00	220.00
CHILDREN & YOUNG PEOPLE	Gordon Brown OEC			
CHILDREN & YOUNG PEOPLE	Gordon Brown OEC	Residential stays for Brent Schools	156.00	159.00
CHILDREN & YOUNG PEOPLE	Gordon Brown OEC	Residential stays for non Brent Schools	172.50	176.00
CHILDREN & YOUNG PEOPLE	Gordon Brown OEC	Non-residential day visit for non Brent Schools	6.05	6.20
CHILDREN & YOUNG PEOPLE	Gordon Brown OEC	Non-residential day visit for Brent Schools	8.25	8.40
CHILDREN & YOUNG PEOPLE	Setting and School Effectiveness Service			
CHILDREN & YOUNG PEOPLE	Setting and School Effectiveness Service	Compliance and Governor Training Annual package	1,906.30	1,948.00
CHILDREN & YOUNG PEOPLE	Setting and School Effectiveness Service	Compliance and Governor Training Pay as you go rate (blended course rate)	121.00	123.70
CHILDREN & YOUNG PEOPLE	Setting and School Effectiveness Service	FFT annual subscription (Primary)	181.50	181.50
CHILDREN & YOUNG PEOPLE	Setting and School Effectiveness Service	FFT annual subscription (Secondary)	907.50	907.50
CHILDREN & YOUNG PEOPLE	Setting and School Effectiveness Service	Moderation of Teacher Assessment	567.60	580.00
CHILDREN & YOUNG PEOPLE	Setting and School Effectiveness Service	Newly Qualified Teachers - Acting as Appropriate Body for NQT Induction Standard (3 term) rate	330.00	340.00
CHILDREN & YOUNG PEOPLE	Setting and School Effectiveness Service	Brent Music Service Instrumental/vocal tuition	660.00	675.00
CHILDREN & YOUNG PEOPLE	Setting and School Effectiveness Service	Brent Music Service Large group tuition	743.00	750.00
CHILDREN & YOUNG PEOPLE	Setting and School Effectiveness Service	Brent Music Service Music'sCool' where class teacher remains with BMS teacher	1,584.00	1,617.00
CHILDREN & YOUNG PEOPLE	Setting and School Effectiveness Service	Brent Music Service Music'sCool' where BMS teacher provides PPA cover	2,013.00	2,013.00
CHILDREN & YOUNG PEOPLE	Setting and School Effectiveness Service	Brent Music Service Wider Opportunities	1,089.00	1,089.00
CHILDREN & YOUNG PEOPLE	Short Break Centre	Respite Care - Brent Children	550.00	550.00
CHILDREN & YOUNG PEOPLE	Short Break Centre	Respite Care - Other LA (Weekday)	722.00	722.00
CHILDREN & YOUNG PEOPLE	Short Break Centre	Respite Care - Other LA (Weekend)	956.00	956.00

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	19/20 CHARGE £ (Excl. VAT)	20/21 PROPOSED CHARGES £ (Excl. VAT)
CHILDREN & YOUNG PEOPLE	Short Break Centre	Respite Care - Other LA (Weekday, 2:1 Care)	956.00	956.00
REGENERATION & ENVIRONMENT	Environmental Services - Commercial team			
REGENERATION & ENVIRONMENT	Environmental Services - Commercial team	Return of stray dog (maximum)	30.00	35.00
REGENERATION & ENVIRONMENT	Environmental Services - Commercial team	Dog Fouling Fixed Penalty	100.00	100.00
REGENERATION & ENVIRONMENT	Environmental Services - Commercial team	Works in default - Single property or shared dwellings	150.00	150.00
REGENERATION & ENVIRONMENT	Environmental Services - Commercial team	2nd Post Mortems - Defence cases	830.00	850.00
REGENERATION & ENVIRONMENT	Environmental Health			
REGENERATION & ENVIRONMENT	Environmental Health	Contaminated Land Basic Enquiry	61.00	62.00
REGENERATION & ENVIRONMENT	Environmental Health	Contaminated Land Residential Property Search	121.00	124.00
REGENERATION & ENVIRONMENT	Environmental Health	Contaminated Land Commercial Property Search	242.00	247.00
REGENERATION & ENVIRONMENT	Environmental Health	Works in Default Interest Rate Bank of England Base Rate plus 8%	Bank of England rate plus 8%	Bank of England rate plus 8%
REGENERATION & ENVIRONMENT	Environmental Health	Works in Default Officer Rate (per hour subject to grade)	£22 - £30 p/h	£30 - £40 p/h
REGENERATION & ENVIRONMENT	Environmental Health	Part B Permits for Mobile Plant and Solvent Emission Activities. Various fees as per DEFRA's charging Scheme	Various fees as per DEFRA's charging Scheme	Various fees as per DEFRA's charging Scheme
REGENERATION & ENVIRONMENT	Pest Control			
REGENERATION & ENVIRONMENT	Pest Control	Pest - Bedbugs (2 visits)	220.00	250.00
REGENERATION & ENVIRONMENT	Pest Control	Pest - Bedbugs 5-8 bedrooms (2 visits)	250.00	280.00
REGENERATION & ENVIRONMENT	Pest Control	Combined Rats and cockroaches	227.00	257.00
REGENERATION & ENVIRONMENT	Pest Control	Pest - Beetles, garden ants (1 visit)	99.00	99.00
REGENERATION & ENVIRONMENT	Pest Control	Pest - Cockroaches (1 visit)	139.00	150.00
REGENERATION & ENVIRONMENT	Pest Control	Pest - Fleas (2 visits)	144.00	150.00
REGENERATION & ENVIRONMENT	Pest Control	Pest - Mice (3 visits)	110.00	140.00
REGENERATION & ENVIRONMENT	Pest Control	Combined mice and cockroaches	227.00	257.00
REGENERATION & ENVIRONMENT	Pest Control	Pest - Rats (3 visits)	110.00	140.00
REGENERATION & ENVIRONMENT	Pest Control	Pest - Wasps (1 visit)	60.00	60.00

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	19/20 CHARGE £ (Excl. VAT)	20/21 PROPOSED CHARGES £ (Excl. VAT)
REGENERATION & ENVIRONMENT	Pest Control	Pest treatment, Pharaoh Ants	220.00	220.00
REGENERATION & ENVIRONMENT	Pest Control	Pest treatment, Clothes Moths	199.00	220.00
REGENERATION & ENVIRONMENT	Pest Control	Pest treatment, Squirrels	110.00	140.00
REGENERATION & ENVIRONMENT	Pest Control	Pest treatment - appointment missed/treatment not carried out	35.00	35.00
REGENERATION & ENVIRONMENT	Building Control			
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table A - Charges for the erection of one or more new dwelling units (<250m2) Full Plan charge ranging from 1 - 15 units	£400 - £1,460	£400 - £1,460
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table A - Charges for the erection of one or more new dwelling units (<250m2) Full Inspection charge ranging from 1 - 15 units	£600 - £2,190	£600 - £2,190
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table A - Charges for the erection of one or more new dwelling units (<250m2) Regularisation/ reversion charge ranging from 1 - 15 units	£1,300 - £4,745	£1,300 - £4,745
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table A - Charges for the erection of one or more new dwelling units (<250m2) Additional charge for basements	£250.00	£250.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table A - Charges for the erection of > 15 units or units > 250m2) Full Plan & Inspection charge	Individually assessed	Individually assessed
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table B - (Standard Charges for extensions, loft conversions etc.) Charges for plan, inspection, & combined charge Garage/Carport/store < 40m2	£325.00	£325.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table B - (Standard Charges for extensions, loft conversions etc.) Charges for regularisation/reversion - Garage/Carport/store < 40m2	£422.50	£422.50
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table B - (Standard Charges for extensions, loft conversions etc.) Charges for plan, inspection, & combined charge Garage/Carport/store < 60m2	£425.00	£425.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table B - (Standard Charges for extensions, loft conversions etc.) Charges for regularisation/reversion - Garage/Carport/store < 60m2	£552.50	£552.50
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table B - (Standard Charges for extensions, loft conversions etc.) Charges for plan, inspection, & combined charge Domestic/Residential extensions <10m2	£430.00	£430.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table B - (Standard Charges for extensions, loft conversions etc.) Charges for regularisation/reversion Domestic/Residential extensions <10m2	£559.00	£559.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table B - (Standard Charges for extensions, loft conversions etc.) Charges for plan, inspection & combined charge Domestic/Residential extensions <40m2	£560.00	£560.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table B - (Standard Charges for extensions, loft conversions etc.) Charges for regularisation/reversion Domestic/Residential extensions <40m2	£728.00	£728.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table B - (Standard Charges for extensions, loft conversions etc.) Full plan charge Domestic/Residential extensions <60m2	£290.00	£290.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table B - (Standard Charges for extensions, loft conversions etc.) Full inspection charge Domestic/Residential extensions <60m2	£435.00	£435.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table B - (Standard Charges for extensions, loft conversions etc.) Combined charge Domestic/Residential extensions <60m2	£725.00	£725.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table B - (Standard Charges for extensions, loft conversions etc.) Charges for regularisation/reversion Domestic/Residential extensions <60m2	£942.50	£942.50

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	19/20 CHARGE £ (Excl. VAT)	20/21 PROPOSED CHARGES £ (Excl. VAT)
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table B - (Standard Charges for extensions, loft conversions etc.) Full plan charge Domestic/Residential extensions <100m2	£328.00	£328.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table B - (Standard Charges for extensions, loft conversions etc.) Full inspection charge Domestic/Residential extensions <100m2	£492.00	£492.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table B - (Standard Charges for extensions, loft conversions etc.) Combined charge Domestic/Residential extensions <100m2	£820.00	£820.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table B - (Standard Charges for extensions, loft conversions etc.) Charges for regularisation/reversion Domestic/Residential extensions <100m2	£1,066.00	£1,066.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table B - (Standard Charges for extensions, loft conversions etc.) Full plan charge Domestic/Residential loft conversion <60m2	£560.00	£560.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table B - (Standard Charges for extensions, loft conversions etc.) Charges for regularisation/reversion Domestic/Residential loft conversions <60m2	£728.00	£728.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table B - (Standard Charges for extensions, loft conversions etc.) Full plan charge Domestic/Residential loft conversion <100m2	£325.00	£325.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table B - (Standard Charges for extensions, loft conversions etc.) Charges for regularisation/reversion Domestic/Residential loft conversions <100m2	£422.50	£422.50
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table B - Full Plan charge, Combined Charge Domestic alterations undertaken at same time as extensions, etc where estimated cost < £10k	£210.00	£210.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table B - Charges for regularisation/reversion Domestic alterations undertaken at same time as extensions, etc where estimated cost < £10k	£273.00	£273.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table B - Full Plan charge, Combined Charge Domestic alterations undertaken at same time as extensions, etc where estimated cost £10k - £20k	£280.00	£280.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table B - Charges for regularisation/reversion Domestic alterations undertaken at same time as extensions, etc where estimated cost £10k - £20k	£364.00	£364.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table B - Full Plan charge, Combined Charge Conversion of garage to habitable room at the same time as extensions,etc.	£280.00	£280.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table B - Charges for regularisation/reversion Conversion of garage to habitable room at the same time as extensions,etc.	£364.00	£364.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table B - Full Plan charge CAPPED for MULTIPLE WORKS TO SINGLE DWELLING <300m2) - Same application and undertaken at same time (excl. Electrical or gas installation works - refer Table C)	£680.00	£680.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table B - Inspection charge CAPPED for MULTIPLE WORKS TO SINGLE DWELLING <300m2) - Same application and undertaken at same time (excl. Electrical or gas installation works - refer Table C)	£1,020.00	£1,020.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table B - Combined charge CAPPED for MULTIPLE WORKS TO SINGLE DWELLING <300m2) - Same application and undertaken at same time (excl. Electrical or gas installation works - refer Table C)	£1,700.00	£1,700.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table B - Charges for regularisation/reversion CAPPED for MULTIPLE WORKS TO SINGLE DWELLING <300m2) - Same application and undertaken at same time (excl. Electrical or gas installation works - refer Table C)	£2,210.00	£2,210.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table B - (Standard Charges for extensions, loft conversions etc.) Charges for full plan, inspection, & combined charge Commercial extensions <10m2	£480.00	£480.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table B - (Standard Charges for extensions, loft conversions etc.) Charges for regularisation/reversion Commercial extensions <10m2	£624.00	£624.00

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	19/20 CHARGE £ (Excl. VAT)	20/21 PROPOSED CHARGES £ (Excl. VAT)
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table B - (Standard Charges for extensions, loft conversions etc.) Charges for full plan, inspection, & combined charge Commercial extensions <40m2	£640.00	£640.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table B - (Standard Charges for extensions, loft conversions etc.) Charges for regularisation/reversion Domestic/Residential extensions <40m2	£832.00	£832.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table B - (Standard Charges for extensions, loft conversions etc.) Full plan charge Commercial extensions <60m2	£320.00	£320.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table B - (Standard Charges for extensions, loft conversions etc.) Full inspection charge Commercial extensions <60m2	£480.00	£480.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table B - (Standard Charges for extensions, loft conversions etc.) Combined charge Commercial extensions <60m2	£800.00	£800.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table B - (Standard Charges for extensions, loft conversions etc.) Charges for regularisation/reversion Commercial extensions <60m2	£1,040.00	£1,040.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table B - (Standard Charges for extensions, loft conversions etc.) Full plan charge Commercial extensions <100m2	£384.00	£384.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table B - (Standard Charges for extensions, loft conversions etc.) Full inspection charge Commercial extensions <100m2	£576.00	£576.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table B - (Standard Charges for extensions, loft conversions etc.) Combined charge Commercial extensions <100m2	£960.00	£960.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table B - (Standard Charges for extensions, loft conversions etc.) Charges for regularisation/reversion Commercial extensions <100m2	£1,248.00	£1,248.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table B - (Standard Charges for extensions, loft conversions etc.) Additional charge for Basements in Commercial extensions Full plan charge	£100.00	£100.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table B - (Standard Charges for extensions, loft conversions etc.) Additional charge for Basements in Commercial extensions Full inspection charge	£150.00	£150.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table B - (Standard Charges for extensions, loft conversions etc.) Additional charge for Basements in Commercial extensions Combined charge	£250.00	£250.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table B - (Standard Charges for extensions, loft conversions etc.) Additional charge for Basements in Commercial extensions regularisation /reversion	£325.00	£325.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table B - (Standard Charges for extensions, loft conversions etc.) Full plan charge Conversion to form 1 or 2 flats	£228.00	£228.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table B - (Standard Charges for extensions, loft conversions etc.) Full inspection charge Conversion to form 1 or 2 flats	£342.00	£342.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table B - (Standard Charges for extensions, loft conversions etc.) Combined charge Conversion to form 1 or 2 flats	£570.00	£570.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table B - (Standard Charges for extensions, loft conversions etc.) Charges for regularisation/reversion Conversion to form 1 or 2 flats	£741.00	£741.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table B - (Standard Charges for extensions, loft conversions etc.) Full plan additional charges for Conversions above 2 flats	£80.00	£80.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table B - (Standard Charges for extensions, loft conversions etc.) Full inspection additional charges for Conversions above 2 flats	£120.00	£120.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table B - (Standard Charges for extensions, loft conversions etc.) Combined additional charges for Conversions above 2 flats	£200.00	£200.00

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	19/20 CHARGE £ (Excl. VAT)	20/21 PROPOSED CHARGES £ (Excl. VAT)
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table B - (Standard Charges for extensions, loft conversions etc.) Regularisation / reversion additional charges for Conversions above 2 flats	£260.00	£260.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table C (Standard Charges for Domestic Alteration work) Combined Charge Underpinning < 10m length	£330.00	£330.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table C (Standard Charges for Domestic Alteration work) Regularisation Charge Underpinning < 10m length	£429.00	£429.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table C (Standard Charges for Domestic Alteration work) Combined Charge Underpinning (each additional 10m)	£185.00	£185.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table C (Standard Charges for Domestic Alteration work) Regularisation Charge Underpinning (each additional 10m)	£240.50	£240.50
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table C (Standard Charges for Domestic Alteration work) Combined Charge Recovering existing roof (terraced / semi)	£265.00	£265.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table C (Standard Charges for Domestic Alteration work) Regularisation Charge Recovering existing roof (terraced / semi)	£344.50	£344.50
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table C (Standard Charges for Domestic Alteration work) Combined Charge Recovering existing roof (detached)	£345.00	£345.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table C (Standard Charges for Domestic Alteration work) Regularisation Charge Recovering existing roof (detached)	£448.50	£448.50
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table C (Standard Charges for Domestic Alteration work) Combined Charge Replacement Windows/Doors Up to 5 windows / doors (Not CPS)	£130.00	£130.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table C (Standard Charges for Domestic Alteration work) Regularisation Charge Replacement Windows/Doors Up to 5 windows / doors (Not CPS)	£169.00	£169.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table C (Standard Charges for Domestic Alteration work) Combined Charge Replacement Windows/Doors Up to 20 windows / doors (Not CPS)	£225.00	£225.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table C (Standard Charges for Domestic Alteration work) Regularisation Charge Replacement Windows/Doors Up to 20 windows / doors (Not CPS)	£292.50	£292.50
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table C (Standard Charges for Domestic Alteration work) Combined Charge Domestic Electrical w orks (<10 circuits) - Not carried out under Competent Person Scheme.	£265.00	£265.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table C (Standard Charges for Domestic Alteration work) Regularisation Charge Domestic Electrical w orks (<10 circuits) - Not carried out under Competent Person Scheme.	£344.50	£344.50
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table C (Standard Charges for Domestic Alteration work) Combined Charge Domestic Electrical w orks (10+ circuits) - Not carried out under Competent Person Scheme.	£330.00	£330.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table C (Standard Charges for Domestic Alteration work) Regularisation Charge Domestic Electrical w orks (10+ circuits) - Not carried out under Competent Person Scheme.	£429.00	£429.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table C (Standard Charges for Domestic Alteration work) Combined Charge Gas Boiler Installation, UVHW systems or similar NOT under CPS.	£165.00	£165.00
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table C (Standard Charges for Domestic Alteration work) Regularisation Charge Gas Boiler Installation, UVHW systems or similar NOT under CPS.	£214.50	£214.50
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table D (Charges for Other Works) Estimated costs of Works < £200k Full Plan Charge	£245 - £662	£245 - £662
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table D (Charges for Other Works) Estimated costs of Works £30k - £200k Full Inspection Charge	£336 - £993	£336 - £993
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table D (Charges for Other Works) Estimated costs of Works < £200k Combined Charge	£245 - £1,655	£245 - £1,655

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	19/20 CHARGE £ (Excl. VAT)	20/21 PROPOSED CHARGES £ (Excl. VAT)
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table D (Charges for Other Works) Estimated costs of Works < £200k Regularisation/ reversion charge	£318.50 - £2,151.50	£318.50 - £2,151.50
REGENERATION & ENVIRONMENT	Building Control	Building Regulations Table D (Charges for Other Works) Estimated costs of Works > £200k Combined Charge & Regularisation/ reversion charge	£250.00	£250.00
REGENERATION & ENVIRONMENT	Building Control	Demolition Notices	£300.00	£300.00
REGENERATION & ENVIRONMENT	Building Control	Dangerous Structures	22.03	£22.03
REGENERATION & ENVIRONMENT	Building Control	Copy of Decision Notice	40.00	£40.00
REGENERATION & ENVIRONMENT	Building Control	Copy of Section 25 PHA certificate/notice	25.00	£25.00
REGENERATION & ENVIRONMENT	Building Control	Existing Premises Name Change -Single house or premises per property	80.00	£80.00
REGENERATION & ENVIRONMENT	Building Control	Existing Premises Name Change –Multiple property involving more than one premises / address.	£80.00 PLUS £15.00 for each additional unit within premises (e.g. flat or commercial unit)	£80.00 PLUS £15.00 for each additional unit within premises (e.g. flat or commercial unit)
REGENERATION & ENVIRONMENT	Building Control	Existing Premises - Street Name Change	£400 + £80 per property	£400 + £80 per property
REGENERATION & ENVIRONMENT	Building Control	Existing Premises - Regularisation of previously unauthorised use of address / Retrospective application.	As per schedule PLUS 30%	As per schedule PLUS 30%
REGENERATION & ENVIRONMENT	Building Control	Existing Premises - Providing Copy of SNN Decision Notice + Agreed Plans (where available) charge per application.	£40.00	£40.00
REGENERATION & ENVIRONMENT	Building Control	Street Naming & Numbering (house/property name change)	£100.00	£100.00
REGENERATION & ENVIRONMENT	Building Control	Street Naming & Numbering (Rename of street)	£500.00	£500.00
REGENERATION & ENVIRONMENT	Building Control	Street Naming & Numbering (New property 1-2 plots)	£135.00	£135.00
REGENERATION & ENVIRONMENT	Building Control	Street Naming & Numbering (New property 3-5 plots)	£145.00	£145.00
REGENERATION & ENVIRONMENT	Building Control	Street Naming & Numbering (New property 6-10 plots)	£220.00	£220.00
REGENERATION & ENVIRONMENT	Building Control	Street Naming & Numbering (New property 11-20 plots)	£310.00	£310.00
REGENERATION & ENVIRONMENT	Building Control	Street Naming & Numbering (New property 21-50 plots)	£590.00	£590.00
REGENERATION & ENVIRONMENT	Building Control	Street Naming & Numbering (New property 51-100 plots)	£860.00	£860.00
REGENERATION & ENVIRONMENT	Building Control	Street Naming & Numbering (New property 100+ plots plots)	£860.00 + £5.25 per plot for example, 120 units = £860.00 + (20 x £5.25) = £965.00	£860.00 + £5.25 per plot for example, 120 units = £860.00 + (20 x £5.25) = £965.00
REGENERATION & ENVIRONMENT	Building Control	Street Naming & Numbering (New property additional charge where this includes naming a street)	150.00	£150.00
REGENERATION & ENVIRONMENT	Public Safety			
REGENERATION & ENVIRONMENT	Public Safety	Stadium Safety Certification (General/New Style)	104.00	104.00

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	19/20 CHARGE £ (Excl. VAT)	20/21 PROPOSED CHARGES £ (Excl. VAT)
REGENERATION & ENVIRONMENT	Public Safety	Stadium Safety Certification (Special)	104.00	104.00
REGENERATION & ENVIRONMENT	Public Safety	Revision of Safety Certificate	104.00	104.00
REGENERATION & ENVIRONMENT	Highways and Transportation			
REGENERATION & ENVIRONMENT	Highways and Infrastructure	Failed Core Samples, Cost Neutral sample inspection	150.00	150.00
REGENERATION & ENVIRONMENT	Highways and Infrastructure	Section 50 Licence Application, varies on depth	Variable	Variable
REGENERATION & ENVIRONMENT	Highways and Infrastructure	NRSWA CAT 1+2 Roads - DfT Maximum £105	105.00	105.00
REGENERATION & ENVIRONMENT	Highways and Infrastructure	NRSWA CAT 1+2 Roads - DfT Maximum £240	223.00	223.00
REGENERATION & ENVIRONMENT	Highways and Infrastructure	NRSWA CAT 1+2 Roads - DfT Maximum £130	130.00	130.00
REGENERATION & ENVIRONMENT	Highways and Infrastructure	NRSWA CAT 1+2 Roads - DfT Maximum £65	65.00	65.00
REGENERATION & ENVIRONMENT	Highways and Infrastructure	NRSWA CAT 1+2 Roads - DfT Maximum £60	60.00	60.00
REGENERATION & ENVIRONMENT	Highways and Infrastructure	NRSWA CAT 3+4 Roads - DfT Maximum £75	75.00	75.00
REGENERATION & ENVIRONMENT	Highways and Infrastructure	NRSWA CAT 3+4 Roads - DfT Maximum £150	150.00	150.00
REGENERATION & ENVIRONMENT	Highways and Infrastructure	NRSWA CAT 3+4 Roads - DfT Maximum £75	75.00	75.00
REGENERATION & ENVIRONMENT	Highways and Infrastructure	NRSWA CAT 3+4 Roads - DfT Maximum £45	45.00	45.00
REGENERATION & ENVIRONMENT	Highways and Infrastructure	NRSWA CAT 3+4 Roads - DfT Maximum £40	40.00	40.00
REGENERATION & ENVIRONMENT	Highways and Infrastructure	NRSWA Section 72 Inspection of defective reinstatement	47.50	47.50
REGENERATION & ENVIRONMENT	Highways and Infrastructure	NRSWA Section 72 Defective reinstatement reported	68.00	68.00
REGENERATION & ENVIRONMENT	Highways and Infrastructure	NRSWA Section 74 charges	varies £100 - £2500 per day	varies £100 - £2500 per day
REGENERATION & ENVIRONMENT	Highways and Infrastructure	NRSWA Major offence (discount for early pay)	500.00	500.00
REGENERATION & ENVIRONMENT	Highways and Infrastructure	NRSWA Minor offence (discounted for early pay)	120.00	120.00
REGENERATION & ENVIRONMENT	Highways and Infrastructure	Nonrefundable admin charge Domestic Vehicle Crossing	70.00	100.00
REGENERATION & ENVIRONMENT	Highways and Infrastructure	Nonrefundable admin charge Industrial Vehicle Crossover	70.00	100.00
REGENERATION & ENVIRONMENT	Highways and Infrastructure	Crossings - White Line Access Bar <6m fixed £	50.00	50.00
REGENERATION & ENVIRONMENT	Highways and Infrastructure	Crossings -White Line Access Bar 6-10m	60.00	100.00

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	19/20 CHARGE £ (Excl. VAT)	20/21 PROPOSED CHARGES £ (Excl. VAT)
REGENERATION & ENVIRONMENT	Highways and Infrastructure	Crossings - White Line Access Bar >10m	POA	POA
REGENERATION & ENVIRONMENT	Highways and Infrastructure	Crossings - White Line Access Bar application	N/A	25.00
REGENERATION & ENVIRONMENT	Highways and Infrastructure	Crossings - Mark Up on Constructing a crossing	40% Mark up	40% Mark up
REGENERATION & ENVIRONMENT	Highways and Infrastructure	TM, cost of officer resource at events	4037.33 (per event)	4037.33 (per event)
REGENERATION & ENVIRONMENT	Highways and Infrastructure	Temporary Traffic Management Order	2,250.00	2,304.00
REGENERATION & ENVIRONMENT	Highways and Infrastructure	Emergency Traffic Manag. Order s14(2)	1,150.00	1,177.60
REGENERATION & ENVIRONMENT	Highways and Infrastructure	Traffic Road Order	4,500.00	4,608.00
REGENERATION & ENVIRONMENT	Highways and Infrastructure	Permanent Orders	3,500.00	3,584.00
REGENERATION & ENVIRONMENT	Highways and Infrastructure	Stopping Up Orders	4,000.00	4,096.00
REGENERATION & ENVIRONMENT	Public Realm (Recreation)			
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Hire of pavilion per hour	52.50	54.00
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Hire of pavilion per hour after 8pm in Winter, after 10pm in summer per hour	67.00	70.00
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Partial cost recovery of events in parks - Category 2	1,027.00	1,050.00
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Partial cost recovery of events in parks - Category 3	2,054.00	2,100.00
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Reinstatement (Refundable deposit)- category 3	2,700.00	2,800.00
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Partial cost recovery of events in parks (ticketed events) up to 300 hundred attendees	205.40	220.00
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Partial cost recovery of events in parks (ticketed events) up to 600 hundred attendees	410.80	420.00
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Reinstatement (Refundable deposit)- category 1 (+£200)	200.00	220.00
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Ad-hoc street parties and special events on non-traffic sensitive streets	200.00	200.00
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Regular special events	1,125.00	1,150.00
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Special events hosted by commercial groups	1,325.00	1,325.00
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Circus or funfair similar in size or scope to a BSAG Category 2 event (daily fee)	1,000.00	1,000.00
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Refundable damage deposit for a circus or funfair event similar in size or scope to a BSAG Category 2 event (whole event)	1,000.00	1,000.00
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Circus or funfair similar in size or scope to a BSAG Category 3 event or a circus and funfair combined (daily fee)	2,000.00	2,000.00

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	19/20 CHARGE £ (Excl. VAT)	20/21 PROPOSED CHARGES £ (Excl. VAT)
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Refundable damage deposit for a circus or funfair similar in size or scope to a BSAG Category 3 event or a circus and funfair combined (whole event)	2,000.00	2,000.00
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	£500 -Reinstatement (Refundable deposit)- category 2 (+500)	500.00	500.00
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Small Events	65.00	68.00
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Partial cost recovery of events in parks (ticketed events) up to 1000 hundred attendees	924.00	950.00
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Soccer Adult Single	81.00	83.00
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Soccer Adult Short Season [13 week pre booked]	945.00	970.00
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Soccer Adult Long Season [17 weeks pre-booked]	1,240.00	1,270.00
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Soccer Junior 11-a-side Single	48.00	50.00
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Soccer Junior 9-a-side Single	42.00	44.00
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Soccer Junior 7-a-side Single	28.50	30.00
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Soccer Junior 5-a-side Single	19.50	21.00
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Soccer Junior 11-a-side Short Season [13 week pre booked]	565.00	585.00
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Soccer Junior 11-a-side Long Season [17 weeks pre-booked]	740.00	765.00
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Soccer Junior 9-a-side Short Season [13 week pre booked]	495.00	514.80
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Soccer Junior 9-a-side Long Season [17 weeks pre-booked]	640.00	673.00
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Soccer Junior 7-a-side Short Season [13 week pre booked]	335.00	351.00
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Soccer Junior 7-a-side Long Season [17 weeks pre-booked]	435.00	459.00
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Soccer Junior 5-a-side Short Season [13 week pre booked]	230.00	246.00
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Soccer Junior 5-a-side Long Season [17 weeks pre-booked]	295.00	322.00
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Rugby Adult Single	88.00	90.00
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Rugby junior Single	51.50	53.00
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Gaelic Adult single (with changing)	107.00	109.00
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Gaelic Adult single (without changing)	75.00	78.00
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Gaelic junior single (with changing)	63.50	65.00

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	19/20 CHARGE £ (Excl. VAT)	20/21 PROPOSED CHARGES £ (Excl. VAT)
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Gaelic junior single (without changing)	45.00	47.00
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Hurling Adult single	107.00	109.00
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Hurling Junior single	56.00	65.00
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Cricket single	115.00	120.00
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Cricket Adult [11 week season]	1,170.00	1,188.00
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Cricket Junior (11 week season)	580.00	585.00
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Cricket junior single	68.00	70.00
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Artificial cricket wicket (Adults) per match	79.00	82.00
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Artificial cricket wicket (juniors) per match	48.00	50.00
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Bowls - per green	2,345.00	2,345.00
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Bowls - per rink per season	474.00	474.00
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Tennis Court - adult, per hour	7.00	8.00
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Tennis Court - junior, per hour	2.20	2.50
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Tennis Court - where no more than 50% of players are Adults	3.50	4.00
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Multi Use Games Areas (not including changing rooms)	18.00	N/A
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Netball Court - adult per hour (not including changing rooms)	32.00	N/A
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Netball Court - junior per hour (not including changing rooms)	22.00	N/A
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Adult training soccer/rugby/Gaelic/Hurling not on a pitch (per 2 hours including changing rooms, excluding floodlights)	63.00	65.00
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Junior training soccer/rugby/Gaelic/hurling not on a pitch (per 2 hours including changing rooms, excluding floodlights)	37.00	39.00
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Floodlights per hour	22.00	25.00
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Unmarked ground school/sports use (Morning or afternoon - 3 hours including changing rooms)	53.00	65.00
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Hire of changing rooms only (during normal staffing hours)	50.00	55.00
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Late cancellation fees	26.00	28.00
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Boot camp/ personal fitness sessions (per hour)	52.00	55.00

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	19/20 CHARGE £ (Excl. VAT)	20/21 PROPOSED CHARGES £ (Excl. VAT)
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Model Aircraft Licence Fee	42.00	42.00
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Volleyball	N/A	30.00
REGENERATION & ENVIRONMENT	Public Realm (Recreation)	Memorial bench in a park	N/A	1,000.00
REGENERATION & ENVIRONMENT	Public Realm (Waste)			
REGENERATION & ENVIRONMENT	Public Realm (Waste)	Garden Waste Collection	60.00	60.00
REGENERATION & ENVIRONMENT	Public Realm (Waste)	Bulky Waste Collection	35.00	35.00
REGENERATION & ENVIRONMENT	Cemeteries (NB that fees relating to burial rights, internment and grave spaces for persons under 18 years are paid through the government 'Children's Funeral Fund' grant and not by families.)			
REGENERATION & ENVIRONMENT	Applicable to only Brent residents			
REGENERATION & ENVIRONMENT	Cemeteries - Brent Residents	Burial rights Carpenders Park Lawn Cemetery	2,662.00	2,662.00
REGENERATION & ENVIRONMENT	Cemeteries - Brent Residents	Burial rights Willesden New, Alperton, Paddington Old Cemetery - Reclaim	2,662.00	3,500.00
REGENERATION & ENVIRONMENT	Cemeteries - Brent Residents	Burial rights Willesden New, Alperton, Paddington Old Cemetery - New Plot	N/A	4,500.00
REGENERATION & ENVIRONMENT	Cemeteries - Brent Residents	Interment	847.00	864.00
REGENERATION & ENVIRONMENT	Cemeteries - Brent Residents	Burial rights - Path side graves Carpenders Park Lawn Cemetery	3,932.50	3,932.50
REGENERATION & ENVIRONMENT	Cemeteries - Brent Residents	Burial rights - Path side graves Willesden New, Alperton, Paddington Old Cemetery	N/A	4,800.00
REGENERATION & ENVIRONMENT	Cemeteries - Brent Residents	Interment - Path side graves	847.00	864.00
REGENERATION & ENVIRONMENT	Cemeteries - Brent Residents	Burial rights - Woodland grave for 1 interment (includes 1 tree)	2,964.50	3,800.00
REGENERATION & ENVIRONMENT	Cemeteries - Brent Residents	Woodland grave for (1 interment) Interment	847.00	864.00
REGENERATION & ENVIRONMENT	Cemeteries - Brent Residents	Burial rights - Woodland grave for ashes	2,964.50	2,964.50
REGENERATION & ENVIRONMENT	Cemeteries - Brent Residents	Woodland grave for ashes Interment	266.00	266.00
REGENERATION & ENVIRONMENT	Cemeteries - Brent Residents	Grave Reopen	1,161.50	1,161.50
REGENERATION & ENVIRONMENT	Cemeteries - Brent Residents	Vault (reopen)	423.50	864.00
REGENERATION & ENVIRONMENT	Cemeteries - Brent Residents	Common Grave	1,210.00	1,210.00
REGENERATION & ENVIRONMENT	Cemeteries - Brent Residents	Cremated Remains In New Half Grave Space Burial Rights & Internment	1,282.50	1,682.50
REGENERATION & ENVIRONMENT	Cemeteries - Brent Residents	Cremated Remains In existing Grave Space Interment	266.00	266.00

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	19/20 CHARGE £ (Excl. VAT)	20/21 PROPOSED CHARGES £ (Excl. VAT)
REGENERATION & ENVIRONMENT	Cemeteries - Brent Residents	Cremated remains in existing vault	157.00	385.00
REGENERATION & ENVIRONMENT	Applicable to Non Brent residents			
REGENERATION & ENVIRONMENT	Cemeteries - Non-Residents	Burial rights Carpenders Park Lawn Cemetery	4,065.50	5,400.00
REGENERATION & ENVIRONMENT	Cemeteries - Non-Residents	Burial rights Willesden New, Alperton, Paddington Old Cemetery - Reclaim	4,065.50	5,800.00
REGENERATION & ENVIRONMENT	Cemeteries - Non-Residents	Burial rights Willesden New, Alperton, Paddington Old Cemetery - - New Plot	N/A	6,385.00
REGENERATION & ENVIRONMENT	Cemeteries - Non-Residents	Interment	1,239.50	1,239.50
REGENERATION & ENVIRONMENT	Cemeteries - Non-Residents	Burial rights - Path side graves Path side graves Carpenders Park Lawn Cemetery	5,929.00	5,929.00
REGENERATION & ENVIRONMENT	Cemeteries - Non-Residents	Burial rights - Path side graves Path side graves Willesden New, Alperton, Paddington Old Cemetery	N/A	6,480.00
REGENERATION & ENVIRONMENT	Cemeteries - Non-Residents	Interment - Path side graves (earth)	1,240.00	1,240.00
REGENERATION & ENVIRONMENT	Cemeteries - Non-Residents	Burial rights - Woodland grave for 1 interment (includes 1 tree)	4,295.50	4,890.00
REGENERATION & ENVIRONMENT	Cemeteries - Non-Residents	Burial rights - Woodland grave for ashes	4,295.50	4,890.00
REGENERATION & ENVIRONMENT	Cemeteries - Non-Residents	Interment - Woodland grave for ashes	399.00	399.00
REGENERATION & ENVIRONMENT	Cemeteries - Non-Residents	Grave Reopen	1,240.00	1,840.00
REGENERATION & ENVIRONMENT	Cemeteries - Non Residents	Interment	1,766.50	1,800.00
REGENERATION & ENVIRONMENT	Cemeteries - Non Residents	Burial rights - Cremated Remains In new half grave space	1,978.00	2,400.00
REGENERATION & ENVIRONMENT	Cemeteries - Non Residents	Interment - Cremated Remains In new half & existing grave space	472.00	515.00
REGENERATION & ENVIRONMENT	Cemeteries - Non Residents	Cremated remains in existing vault	157.00	157.00
REGENERATION & ENVIRONMENT	Applicable for both Brent residents Additional Charges for both Brent residents & non residents			
REGENERATION & ENVIRONMENT	Cemeteries - Additional Charges	Coffin/casket 7' long or 28" wide in earth grave	496.00	N/A
REGENERATION & ENVIRONMENT	Cemeteries - Additional Charges	Coffin/casket 7' long or 30+" wide in earth grave	653.50	N/A
REGENERATION & ENVIRONMENT	Cemeteries - Additional Charges	Earth Grave for 3 where applicable	659.50	659.50
REGENERATION & ENVIRONMENT	Cemeteries - Additional Charges	Shroud timbers & slats	157.00	162.00
REGENERATION & ENVIRONMENT	Cemeteries - Additional Charges	Grave surround	54.50	145.00
REGENERATION & ENVIRONMENT	Cemeteries - Additional Charges	Transfer burial rights	97.00	105.00

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	19/20 CHARGE £ (Excl. VAT)	20/21 PROPOSED CHARGES £ (Excl. VAT)
REGENERATION & ENVIRONMENT	Cemeteries - Additional Charges	Burial Register search fee	36.00	57.00
REGENERATION & ENVIRONMENT	Cemeteries - Additional Charges	Chapel hire up to 2 hours	91.00	159.00
REGENERATION & ENVIRONMENT	Cemeteries - Additional Charges	Saturday burials at Alperton, Paddington and Willesden	726.00	825.00
REGENERATION & ENVIRONMENT	Cemeteries - Additional Charges	Cancellation of an interment or late arrival of funeral cortege of more than 20 mins	302.50	350.00
REGENERATION & ENVIRONMENT	Cemeteries - Additional Charges	Memorial [full with Landing]	357.00	385.00
REGENERATION & ENVIRONMENT	Cemeteries - Additional Charges	Vaults Package Paddington Old Cemetery	N/A	15,000.00
REGENERATION & ENVIRONMENT	Cemeteries - Memorial Permits	Headstone / plaque	302.50	322.00
REGENERATION & ENVIRONMENT	Cemeteries - Memorial Permits	Inscriptions / works	109.00	140.00
REGENERATION & ENVIRONMENT	Cemeteries - Memorial Permits	Memorial removal for interment	169.50	210.00
REGENERATION & ENVIRONMENT	Cemeteries - Memorial Permits	Memorial replacement after interment	169.50	210.00
REGENERATION & ENVIRONMENT	Cemeteries - Memorial Permits	Memorial raise and level (full memorials)	66.50	90.00
REGENERATION & ENVIRONMENT	Cemeteries - Memorial Permits	Memorial raise and level (plaques)	46.00	90.00
REGENERATION & ENVIRONMENT	Cemeteries - Memorial Permits	Tree Plaque at Carpenders Park (Inc. VAT) (Single)	242.00	390.00
REGENERATION & ENVIRONMENT	Cemeteries - Memorial Permits	Tree Plaque at Carpenders Park (Inc. VAT) (Double)	326.50	410.00
REGENERATION & ENVIRONMENT	Cemeteries - Memorial Permits	Bench with plaque on to existing landing (Inc. VAT)	1,331.00	1,500.00
REGENERATION & ENVIRONMENT	Cemeteries - Memorial Permits	Bench Plaques only at Carpenders Park (Inc. VAT - 5 years)	157.00	175.00
REGENERATION & ENVIRONMENT	Cemeteries - Memorial Permits	Concrete based bench with plaque (inc. VAT not at Carpenders Park)	1,452.00	2,152.00
REGENERATION & ENVIRONMENT	Allotments			
REGENERATION & ENVIRONMENT	Allotments	Allotment type site 126m2 (5 pole)	90.00	92.00
REGENERATION & ENVIRONMENT	Allotments	Allotment cost per pole	17.15	18.40
REGENERATION & ENVIRONMENT	Planning			
REGENERATION & ENVIRONMENT	Planning	Correspondence Service L 1 (Householder & Small Business)	240.00	120.00
REGENERATION & ENVIRONMENT	Planning	Correspondence Service L2 (up to 4 residential units/400m2 floor space)	360.00	360.00
REGENERATION & ENVIRONMENT	Planning	Meeting Service L 1 (householder & small business)	960.00	1,200.00

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	19/20 CHARGE £ (Excl. VAT)	20/21 PROPOSED CHARGES £ (Excl. VAT)
REGENERATION & ENVIRONMENT	Planning	Meeting Service L 1 + optional Site Visit Service (householder & small business)	1,800.00	2,400.00
REGENERATION & ENVIRONMENT	Planning	Meeting Service L 2 (up to 4 residential units or up to 499m2 of floor space)	4,800.00	5,280.00
REGENERATION & ENVIRONMENT	Planning	Meeting Service L3 (5 to 9 residential units or 500 to 999m2 of floorspace)	6,500.00	9,000.00
REGENERATION & ENVIRONMENT	Planning	Meeting Service L4 (more than 10 residential units or more than 1,000m2 of floorspace)	12,000.00	12,000.00
REGENERATION & ENVIRONMENT	Planning	Initiation, programming, 1st review (up to 149 units or 2,500m2))	1,800.00	Half of full pre-application cost for relevant pre-app category
REGENERATION & ENVIRONMENT	Planning	Initiation, programming, 1st review (150 plus units or over 2,500m2)	120.00	120.00
REGENERATION & ENVIRONMENT	Planning	Strategic Meeting (up to 149 units or 2,500m2)	Half full price	Half full price
REGENERATION & ENVIRONMENT	Planning	Strategic Meeting (150 plus units or 15,000m2)	Half full price	Half full price
REGENERATION & ENVIRONMENT	Planning	Issue Meeting	2,000.00	2,200.00
REGENERATION & ENVIRONMENT	Planning	Presentation to Planning Committee	4,000.00	2,000.00
REGENERATION & ENVIRONMENT	Planning	Planning/development briefs/ frameworks/ masterplans	9,000.00	9,000.00
REGENERATION & ENVIRONMENT	Planning	Copies of planning decision notices	16.50	25.00
REGENERATION & ENVIRONMENT	Planning	Copies of archived documents	16.50	25.00
REGENERATION & ENVIRONMENT	Planning	Confirmation of compliance with clauses in a S106	500.00	500.00
REGENERATION & ENVIRONMENT	Planning	S106 Legal Fee (per hour)	200.00	200.00
REGENERATION & ENVIRONMENT	Planning	S106 Planning Negotiation Fee - Simple (1-3 obligations)	825.00	905.00
REGENERATION & ENVIRONMENT	Planning	S106 Planning Negotiation Fee - Moderate (4-7 obligations)	1,400.00	1,540.00
REGENERATION & ENVIRONMENT	Planning	S106 Planning Negotiation Fee - Complex (8+ obligations / review mechanisms)	1,925.00	2,115.00
REGENERATION & ENVIRONMENT	Planning	S106 Planning Negotiation Fee - Simple Deed of Variation	410.00	450.00
REGENERATION & ENVIRONMENT	Planning	S106 Monitoring Fee - General - Initial for Simple Agreement	440.00	480.00
REGENERATION & ENVIRONMENT	Planning	S106 Monitoring Fee - General - Initial for Moderate Agreement	495.00	540.00
REGENERATION & ENVIRONMENT	Planning	S106 Monitoring Fee - General - Initial for Complex Agreement	550.00	605.00
REGENERATION & ENVIRONMENT	Planning	S106 Monitoring Fee - General - Standard Simple Obligation	110.00	120.00
REGENERATION & ENVIRONMENT	Planning	S106 Monitoring Fee - General - Standard Moderate Obligation	330.00	360.00

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	19/20 CHARGE £ (Excl. VAT)	20/21 PROPOSED CHARGES £ (Excl. VAT)
REGENERATION & ENVIRONMENT	Planning	S106 Monitoring Fee - General - Standard Complex Obligation	575.00	630.00
REGENERATION & ENVIRONMENT	Planning	S106 Monitoring Fee - Specific - Affordable Housing	575.00	630.00
REGENERATION & ENVIRONMENT	Planning	S106 Monitoring Fee - Specific - Viability Review	1,000.00	1,100.00
REGENERATION & ENVIRONMENT	Planning	S106 Monitoring Fee - Specific - Sustainability	715.00	785.00
REGENERATION & ENVIRONMENT	Planning	S106 Monitoring Fee - Specific - Energy	715.00	785.00
REGENERATION & ENVIRONMENT	Planning	S106 Monitoring Fee - Specific - Sustainability and Energy	1,430.00	1,570.00
REGENERATION & ENVIRONMENT	Planning	S106 Monitoring Fee - Specific - Highway Works (No Verification)	330.00	360.00
REGENERATION & ENVIRONMENT	Planning	S106 Monitoring Fee - Specific - Travel Plan	1,430.00	1,570.00
REGENERATION & ENVIRONMENT	Planning	S106 Monitoring Fee - Specific - Car Club (Off Site)	715.00	785.00
REGENERATION & ENVIRONMENT	Planning	S106 Monitoring Fee - Specific - Permit Fee (No Approval)	110.00	120.00
REGENERATION & ENVIRONMENT	Planning	S106 Monitoring Fee - Specific - Permit Free (Approval)	330.00	360.00
REGENERATION & ENVIRONMENT	Planning	S106 Monitoring Fee - Specific - Training and Employment	715.00	785.00
REGENERATION & ENVIRONMENT	Planning	S106 Monitoring Fee - Specific - Community Access Plan	575.00	630.00
REGENERATION & ENVIRONMENT	Planning	S106 Monitoring Fee - Specific - Notices	55.00	60.00
REGENERATION & ENVIRONMENT	Planning	S106 Monitoring Fee - Specific - Financial Contributions	165.00	180.00
REGENERATION & ENVIRONMENT	Planning	S106 Monitoring Fee - Specific - Considerate Constructors Scheme	110.00	120.00
REGENERATION & ENVIRONMENT	Brent Start			
REGENERATION & ENVIRONMENT	Brent Start	Learning and skills - Accredited courses	3.30	3.60
REGENERATION & ENVIRONMENT	Brent Start	Learning and Skills - Personal and community development learning	4.60	5.00
REGENERATION & ENVIRONMENT	Brent Start	Learning and Skills - Personal and community development learning - concessions (A)	2.30	2.50
REGENERATION & ENVIRONMENT	Brent Start	Learning and Skills - Personal and community development learning - concessions (B)	1.15	1.25
REGENERATION & ENVIRONMENT	Brent Start	Learning and Skills - targeted community development courses	3.30	3.60
REGENERATION & ENVIRONMENT	Brent Start	Learning and Skills - targeted community development courses - concessions (A)	1.70	1.80
REGENERATION & ENVIRONMENT	Brent Start	Full cost recovery courses	16.50	18.00

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	19/20 CHARGE £ (Excl. VAT)	20/21 PROPOSED CHARGES £ (Excl. VAT)
REGENERATION & ENVIRONMENT	Brent Start	Room hire	25.00	27.50
REGENERATION & ENVIRONMENT	Food and Health & Safety			
REGENERATION & ENVIRONMENT	Food and Health & Safety	Cadaver certificate (3 working days' notice)	67.00	68.00
REGENERATION & ENVIRONMENT	Food and Health & Safety	Cadaver certificate (urgent next day service)	131.00	134.00
REGENERATION & ENVIRONMENT	Food and Health & Safety	Food Export Health Certificates (3 working days)	68.00	69.00
REGENERATION & ENVIRONMENT	Food and Health & Safety	Food Export Health Certificates (urgent next day service)	131.00	134.00
REGENERATION & ENVIRONMENT	Food and Health & Safety	Food destruction certificate	254.00	259.00
REGENERATION & ENVIRONMENT	Food and Health & Safety	Freezer breakdown certificate	254.00	259.00
REGENERATION & ENVIRONMENT	Food and Health & Safety	Pool water analysis single pool	242.00	242.00
REGENERATION & ENVIRONMENT	Food and Health & Safety	Pool water analysis double pool	412.50	412.50
REGENERATION & ENVIRONMENT	Food and Health & Safety	Schools Legionella Water Sampling	1,585.00	1,585.00
REGENERATION & ENVIRONMENT	Food and Health & Safety	Schools Drinking Water Sampling	530.00	530.00
REGENERATION & ENVIRONMENT	Food and Health & Safety	Food Hygiene Rating Scheme (FHRS) rating re-assessment	300.00	300.00
REGENERATION & ENVIRONMENT	Food and Health & Safety	Food Business Start-up Scheme	300.00	300.00
REGENERATION & ENVIRONMENT	Food and Health & Safety	Food Hygiene Coaching Service	495.00	495.00
REGENERATION & ENVIRONMENT	Food and Health & Safety	Special treatments exhibition including any treatment from categories B, C or D	£1,365 plus £95 per company administering	£1,365 plus £95 per company administering
REGENERATION & ENVIRONMENT	Food and Health & Safety	Special treatments - lasers (Cat A)	866.00	866.00
REGENERATION & ENVIRONMENT	Food and Health & Safety	Special treatments - massage, acupuncture, tattooing etc (cat B)	704.00	704.00
REGENERATION & ENVIRONMENT	Food and Health & Safety	Special treatments - beauty treatments, etc (Cat C)	420.00	420.00
REGENERATION & ENVIRONMENT	Food and Health & Safety	Special treatments - manicure, nose and ear piercing, etc (Cat D)	231.00	231.00
REGENERATION & ENVIRONMENT	Food and Health & Safety	Special treatments - licence variation including addition or change of therapist	121.00	121.00
REGENERATION & ENVIRONMENT	Licensing			
REGENERATION & ENVIRONMENT	Licensing	Animal Boarding Licence (up to 20 animals)	328.00	328.00
REGENERATION & ENVIRONMENT	Licensing	Breeding of Dogs Licence (with one bitch)	328.00	328.00

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	19/20 CHARGE £ (Excl. VAT)	20/21 PROPOSED CHARGES £ (Excl. VAT)
REGENERATION & ENVIRONMENT	Licensing	Animal Boarding Licence (over 20 animals)	364.00	364.00
REGENERATION & ENVIRONMENT	Licensing	Breeding of Dogs Licence (with more than one bitch)	364.00	364.00
REGENERATION & ENVIRONMENT	Licensing	Performing Animals Registration	364.00	364.00
REGENERATION & ENVIRONMENT	Licensing	Pet Animals (Pet Shop Licence)	364.00	364.00
REGENERATION & ENVIRONMENT	Licensing	Dangerous Wild Animals	390.00	390.00
REGENERATION & ENVIRONMENT	Licensing	Leaflet distribution (application)	198.00 + 78.00 per person per day	198.00 + 78.00 per person per day
REGENERATION & ENVIRONMENT	Licensing	Occasional sales except educational establishments (application)	197.00 + 10.00 per stall	197 + 10.00 per stall
REGENERATION & ENVIRONMENT	Licensing	Sex establishments	360.00	360.00
REGENERATION & ENVIRONMENT	Licensing	Street trading (new application)	81.50	81.50
REGENERATION & ENVIRONMENT	Licensing	Street trading (daily fee)	3.00	3.00
REGENERATION & ENVIRONMENT	Licensing	Street trading (variation)	55.00	55.00
REGENERATION & ENVIRONMENT	Licensing	Temporary Street Trading (per day per stall)	177.00	177.00
REGENERATION & ENVIRONMENT	Licensing	Scrap Metal Site Licence	600.00	600.00
REGENERATION & ENVIRONMENT	Licensing	Scrap Metal Collectors Licence	350.00	350.00
REGENERATION & ENVIRONMENT	Licensing	Explosives Registration	109.00	109.00
REGENERATION & ENVIRONMENT	Licensing	Explosives Licence	185.00	185.00
REGENERATION & ENVIRONMENT	Licensing	Film Classification (per 15 minutes)	15.00	15.00
REGENERATION & ENVIRONMENT	Licensing	Premises Licence - Licensing Act 2003 (see separate list of fees for specific charges)	Various Fees from 10.50 to 64,000	Various Fees from 10.50 to 64,000
REGENERATION & ENVIRONMENT	Licensing	Premises Licence - Gambling Act 2005 (see separate list of fees for specific charges)	Various Fees from 15.00 - 15,000.00	Various Fees from 15.00 - 15,000.00
REGENERATION & ENVIRONMENT	Licensing	Marriage Licence (see separate list of fees for specific charges)	Various Fees from 600.00 to 1,500.00	Various Fees from 600.00 to 1,500.00
REGENERATION & ENVIRONMENT	Licensing	Licensing Surgeries (to help businesses with applications)	165.00	165.00
REGENERATION & ENVIRONMENT	Land Charges			
REGENERATION & ENVIRONMENT	Land charges	Full Official Search (LLC1 and CON29 2016)	280.00	266.67
REGENERATION & ENVIRONMENT	Land charges	Full Official Search and each additional Parcel	55.00	50.83

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	19/20 CHARGE £ (Excl. VAT)	20/21 PROPOSED CHARGES £ (Excl. VAT)
REGENERATION & ENVIRONMENT	Land charges	LLC1	80.00	80.00
REGENERATION & ENVIRONMENT	Land charges	LLC1 Additional Parcel	25.00	25.00
REGENERATION & ENVIRONMENT	Land charges	CON 29 - 2016	200.00	200.00
REGENERATION & ENVIRONMENT	Land charges	Con 29 - 2016 each additional Parcel	30.00	30.00
REGENERATION & ENVIRONMENT	Land charges	CON 29O requested each question submitted with LLC1 and CON 29 - 2016 forms	30.00	30.00
REGENERATION & ENVIRONMENT	Land charges	CON 29 O each question requested separately	40.00	40.00
REGENERATION & ENVIRONMENT	Land charges	Copy Search of replies	40.00	40.00
REGENERATION & ENVIRONMENT	Land charges	CON29 O requested separately for each additional parcel	30.00	30.00
REGENERATION & ENVIRONMENT	Land charges - EIR	CON29 2016 Individual first question	25.00	25.00
REGENERATION & ENVIRONMENT	Land charges - EIR	CON29 2016 Individual each additional question	3.00	3.00
REGENERATION & ENVIRONMENT	Land charges - EIR	CON29 2016 Individual All questions listed on our website under Environmental Informational Regulations details 'Local Land Charges	100.00	100.00
REGENERATION & ENVIRONMENT	Land charges - EIR	CON29 2016 Individual each additional parcel	6.00	6.00
REGENERATION & ENVIRONMENT	Land charges - EIR	Copy of replies CON29 2016 individual replies	15.00	15.00
REGENERATION & ENVIRONMENT	Public Realm (Highways)			
REGENERATION & ENVIRONMENT	Public Realm (Highways)	Temporary Crossing – Commercial:	550.00	555.00
REGENERATION & ENVIRONMENT	Public Realm (Highways)	Crane Oversail	550.00	555.00
REGENERATION & ENVIRONMENT	Public Realm (Highways)	Crane (mobile platform):	330.00	335.00
REGENERATION & ENVIRONMENT	Public Realm (Highways)	Scaffold Licence Fee (0-10m)	230.00	235.00
REGENERATION & ENVIRONMENT	Public Realm (Highways)	Scaffold Licence Fee (10-15m)	295.00	300.00
REGENERATION & ENVIRONMENT	Public Realm (Highways)	Scaffold Licence Fee (15m+)	610.00	620.00
REGENERATION & ENVIRONMENT	Public Realm (Highways)	Hoarding Licence Fee(0-10m)	230.00	235.00
REGENERATION & ENVIRONMENT	Public Realm (Highways)	Hoarding Licence Fee (10-15m)	295.00	300.00
REGENERATION & ENVIRONMENT	Public Realm (Highways)	Hoarding Licence Fee (15m+)	620.00	620.00
REGENERATION & ENVIRONMENT	Public Realm (Highways)	Skip Licence Fee	54.00	56.00

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	19/20 CHARGE £ (Excl. VAT)	20/21 PROPOSED CHARGES £ (Excl. VAT)
REGENERATION & ENVIRONMENT	Public Realm (Highways)	Skips (fines)	250.00	255.00
REGENERATION & ENVIRONMENT	Public Realm (Highways)	Building Material licences (Residential)	160.00	165.00
REGENERATION & ENVIRONMENT	Public Realm (Highways)	Builders Material Licences (Commercial)	325.00	330.00
REGENERATION & ENVIRONMENT	Public Realm (Highways)	Skip Company - Annual Registration fee:	295.00	300.00
REGENERATION & ENVIRONMENT	Public Realm (Highways)	Container/Portacabin licences:	330.00	335.00
REGENERATION & ENVIRONMENT	Public Realm (Highways)	Admin fee for refunds processing	30.00	60.00
REGENERATION & ENVIRONMENT	Trading Standards			
REGENERATION & ENVIRONMENT	Trading Standards	Registration of Premises for Auction	346.00	354.00
REGENERATION & ENVIRONMENT	Trading Standards	Primary Authority - bulk purchase (per hour)	60.00	62.00
REGENERATION & ENVIRONMENT	Trading Standards	Primary Authority - pay as you go (per hour)	75.00	77.00
REGENERATION & ENVIRONMENT	Trading Standards	Verification of Weights & Measures Equipment (per hour)	62.70	65.00
REGENERATION & ENVIRONMENT	Trading Standards	Calibration of Weights for Business 9per Hour	62.70	65.00
REGENERATION & ENVIRONMENT	Trading Standards	Testing of Working Standards and Testing Equipment for other Las (per hour)	62.40	65.00
REGENERATION & ENVIRONMENT	Trading Standards	Extra Staff Member assisting with above W&M fees (per hour)	40.00	41.00
REGENERATION & ENVIRONMENT	Trading Standards	Use of Safety Lab (per hour)	70.00	72.00
REGENERATION & ENVIRONMENT	Trading Standards	Licence to store explosives	Various Fees from 54.00 - 500.00	Various Fees from 54.00 - 500.00
REGENERATION & ENVIRONMENT	Trading Standards	Financial Investigator (per hour, plus contract fee)	40.00	41.00
REGENERATION & ENVIRONMENT	Trading Standards	Redress Schemes for Lettings Agency Work and Property Management Work (Requirement to Belong to a Scheme etc) (England) Order 2014, Full Charge Penalty Notice	5,000.00	5,000.00
REGENERATION & ENVIRONMENT	Trading Standards	Redress Schemes for Lettings Agency Work and Property Management Work (Requirement to Belong to a Scheme etc) (England) Order 2014, Reduced Charge Penalty Notice	2,500.00	2,500.00
REGENERATION & ENVIRONMENT	Trading Standards	Penalty Charge Notice under Part 3, Chapter 3 Consumer Rights Act 2015 (Maximum Penalty)	5,000.00	5,000.00
REGENERATION & ENVIRONMENT	Trading Standards	Full financial penalty issued under the Tenant's Fees Act 2019 (Maximum Penalty)	30,000.00	30,000.00
REGENERATION & ENVIRONMENT	Trading Standards	Full financial penalty issued under the Client Money Protection Schemes for Property Agents (Requirement to Belong to a Scheme etc.) Regulations 2019	N/A	Penalty between £1 - £30,000.00
REGENERATION & ENVIRONMENT	Trading Standards	Enforcement Officer hourly rate	N/A	60.00

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	19/20 CHARGE £ (Excl. VAT)	20/21 PROPOSED CHARGES £ (Excl. VAT)
REGENERATION & ENVIRONMENT	Trading Standards	Senior/Supervisory Staff hourly rate	N/A	80.00 - 90.00
RESOURCES	Registration and Nationality			
RESOURCES	Registration and Nationality	Approved Premises Weddings BCC Internal Monday - Thursday Before 4pm	210.00	231.00
RESOURCES	Registration and Nationality	Approved Premises Weddings BCC internal Monday - Thursday After 4pm	425.00	468.00
RESOURCES	Registration and Nationality	Approved Premises Weddings Internal Friday Before 4pm	235.00	259.00
RESOURCES	Registration and Nationality	Approved Premises Weddings Internal Friday After 4pm	425.00	468.00
RESOURCES	Registration and Nationality	Approved Premises Weddings Internal Saturday Before 4pm	325.00	358.00
RESOURCES	Registration and Nationality	Approved Premises Weddings Internal Saturday After 4pm	475.00	523.00
RESOURCES	Registration and Nationality	Approved Premises Weddings Internal Sunday Before 1pm	400.00	440.00
RESOURCES	Registration and Nationality	Approved Premises Weddings Internal Sunday After 1pm	525.00	578.00
RESOURCES	Registration and Nationality	Approved Premises Weddings external Monday - Friday Before 4pm	400.00	440.00
RESOURCES	Registration and Nationality	Approved Premises Weddings external Monday - Friday After 4pm	450.00	500.00
RESOURCES	Registration and Nationality	Approved Premises Weddings external Saturday Before 4pm	450.00	500.00
RESOURCES	Registration and Nationality	Approved Premises Weddings external Saturday After 4pm	550.00	605.00
RESOURCES	Registration and Nationality	Approved Premises Weddings external Sunday Before 1pm	500.00	550.00
RESOURCES	Registration and Nationality	Approved Premises Weddings external Sunday After 1pm	650.00	715.00
RESOURCES	Registration and Nationality	Bank Holidays Before 4:30pm	1,000.00	1,000.00
RESOURCES	Registration and Nationality	Bank Holidays After 4:30pm	1,000.00	1,000.00
RESOURCES	Registration and Nationality	Private Ceremonies (M- F)	125.00	130.00
RESOURCES	Registration and Nationality	Citizenship Private Ceremony-weekend	170.00	170.00
RESOURCES	Registration and Nationality	NEW - Issue of Letter	N/A	30.00
RESOURCES	Registration and Nationality	Secure Deposit	50.00	100.00
RESOURCES	Registration and Nationality	Change of date	45.00	47.00
RESOURCES	Conference and Events			

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	19/20 CHARGE £ (Excl. VAT)	20/21 PROPOSED CHARGES £ (Excl. VAT)
RESOURCES	Conference and Events	The Grand Hall 10 hours hire package (Monday to Sunday)	5,900.00	5,900.00
RESOURCES	Conference and Events	The Grand Hall 12 hours hire package (Saturday and Sunday only)	8,100.00	8,100.00
RESOURCES	Conference and Events	The Grand Hall 18 hours hire package (Saturday and Sunday only)	9,800.00	9,800.00
RESOURCES	Conference and Events	The Grand Hall additional set up or de-rig hire (per hour)	260.00	300.00
RESOURCES	Conference and Events	The Grand Hall bank holiday surcharge fee	1,030.00	1,030.00
RESOURCES	Conference and Events	The Grand Hall (per hour, min 6 hours required)	520.00	600.00
RESOURCES	Conference and Events	Conference Hall (per hour, min 3 hours required)	260.00	260.00
RESOURCES	Conference and Events	Conference Hall additional set up or de-rig hire (per hour)	150.00	150.00
RESOURCES	Conference and Events	The Bridge (available only with the Grand Hall)	460.00	500.00
RESOURCES	Conference and Events	Garden hire, min 3 hours (per hour)	210.00	210.00
RESOURCES	Conference and Events	One Board Room (per hour)	41.00	41.00
RESOURCES	Conference and Events	Two Board Rooms together (per hour)	62.00	82.00
RESOURCES	Conference and Events	Three Board Rooms together (per hour)	82.00	123.00
RESOURCES	Conference and Events	Four Board Rooms together (per hour)	103.00	164.00
RESOURCES	Conference and Events	Foyer stall hire (4 hours, one extra hour allowed for set and one hour for clearing)	103.00	100.00
RESOURCES	Conference and Events	Foyer stall hire (8 hours, one extra hour allowed for set and one hour for clearing)	155.00	155.00
RESOURCES	Conference and Events	Day Delegate Rate (with sandwich lunch and 3 servings of tea and coffee) per person, min numbers apply	47.00	47.00
RESOURCES	Conference and Events	Day Delegate Rate (with finger buffet lunch and 3 servings of tea and coffee) per person, min numbers apply	56.00	58.00
RESOURCES	Conference and Events	Charitable discount. A discount of 20% - 50% on Conference Hall and Board Rooms hire are available for charitable purpose events that are closely aligned to the Council's Borough Plan and will benefit the borough and its local residents.	20% - 50%	20 - 50%
RESOURCES	Conference and Events	Discretionary discount to attract bookings at quiet times	10%	10% - 20%

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Appendix L (iii) Brent Council Fees and Charges Policy

1 Introduction

- 1.1 By using its powers to charge for goods and services and imposing fines, fixed penalties and other such financial sanctions, Brent Council is able to generate additional income to support investment in services and/or reduce the overall level of expenditure to be met by local tax payers.
- 1.2 The aim of this Fees and Charges Policy is to ensure that the Council makes use of all the powers available to it in order to recover the full cost of providing services. In using these powers however, the Council will wish to take care to ensure that the consequences of charging on individuals, the wider aims of the Council itself and / or organisations do not adversely impact on those who are vulnerable or in difficulties.

2 Background

- 2.1 The overriding aim of the charging policy is to maximise income generation and collection to enhance the social and economic well being of the community the council serves, whilst ensuring a fair price for all services reflecting the ability of the community to pay and the relative demand for the service. Maximisation of income, following a decision to charge, is also dependent on a charge being raised and that amount being collected, both in a timely way.

Legal Position

- 2.2 The majority of the Council's statutory services, Building Control being a key exception, are funded directly from the Council's other main sources of revenue, i.e. government grants and local taxation.
- 2.3 Income received by Brent from fees and charges is generated by both statutory and discretionary services. Where fees and charges apply to statutory services these are often set nationally, for example, some planning and licensing fees.
- 2.4 The remaining income generating services where the Council levies fees and charges are of a discretionary nature. Discretionary services are those that an authority has the power to provide but is not obliged to. They include services provided directly to the public in general such as leisure services as well as charges for the costs incurred by the council (such as legal costs) when entering into planning or highways agreements with specific persons.
- 2.5 The legal powers that the Council has to raise fees and charges are set out in the final section of this policy.

3 Managers' Guidance

Overview

- 3.1 The Managers' Guidance has been written to provide information to managers in Brent Council responsible for applying fees and charges to goods and services delivered. The aim is to encourage a consistent and cost effective approach to the setting of

charges for services provided by:

- a. Specifying the process and frequency for reviewing existing charges for all areas of the council's work for which charges could in principle be set
- b. Providing guidance on the factors that need to be taken into consideration when charges are being reviewed
- c. Requiring more active use of market intelligence when setting charges
- d. Establishing parameters for calculating different levels of charges
- e. Recommending the criteria for applying concessions or discounted charges consistently across the council

Calculation of Fees and Charges

3.2 Fees and charges raised must be based on the full cost of the service. Charges cannot be set at a level to recover more than cost if that is all the Council has the legal power to do, but the definition of cost includes direct costs of service provision together with overhead and central costs. The cost recovery limit applies to the overwhelming majority of services which the Council can set a charge for. If, however, the Council has the legal power to do so careful consideration should be given to charging more than the full cost of the service. For example, charging could be used as a tool to manage excess demand for limited spaces on leisure centre classes. In overview there are 3 ways in which fees and charges may be set:

- a. Fees and charges prescribed by legislation, usually in a regulatory context, and varied from time to time which the person liable has an obligation to pay;
- b. Fees and charges reviewed and set by members (e.g. Individual Cabinet Members, Cabinet or Full Council) from time to time (usually annually); and
- c. Fees and charges reviewed and set by officers from time to time acting under delegated powers.

3.3 As part of the annual budget cycle each department will carry out a recalculation of existing fees and charges together with opportunities to raise additional income from new areas of charging, and present proposals for revised charges.

Approvals

- 3.4 In broad terms setting fees for regulatory services (i.e. licensing, planning, etc) are non-executive functions. These therefore need to be submitted to Full Council for approval. Full Council can, however, delegate this function to a committee, officer etc.
- 3.5 Fees and charges for discretionary services are usually executive functions and therefore need to be approved by Cabinet or Cabinet Members. Cabinet and Cabinet

Members can, however delegate this function.

Concessionary Charging

- 3.6 The purpose of offering concessions must be to support council priorities. Generally the reasons for operating concessionary charges will fall into one of two categories: to influence the level of demand for a service or to reflect the circumstances of service users. Concessions must also be reviewed at least on an annual basis, to confirm both the level of subsidy and also their ongoing relevance.
- 3.7 The Finance Department will maintain a list of concessions in operation and keep under review requests for concessions to be offered. For customer / clients who cannot pay, action must be taken to ensure that there are sufficient safeguards in place to allow access to service, and that appropriate steps are taken to recognise the realistic payment capacity of vulnerable individuals.
- 3.8 Concessionary charges should not normally apply at times when it would result in a loss of income from customers paying the full charge, unless prior approval has been given by a senior Council officer.
- 3.9 No concessions will be provided to non-Brent residents.

Education related services

- 3.10 With regards to education related services, services and packages will be based around the academic year and not on the municipal financial year.

VAT

- 3.11 Managers must ensure that the correct treatment of VAT is applied to the fees and charges they are responsible for. The correct treatment should be agreed with Finance in advance of application.

Other statutory requirements

- 3.12 Managers must also ensure that when setting fees and charges or reporting to members they are aware of any special statutory requirements that need to be complied with. For example, before changes to some fees and charges can be implemented, there may be a statutory requirement to consult and/or publish a notice in a local newspaper.

4 Payment Methods

- 4.1 All collection methods and payment terms must be effective, efficient and appropriate for the service. The preferred methods of payment are those direct to the bank such as direct debits and standing orders.
- 4.2 Wherever practical do to so payment for services provided should be sought in advance to minimise debt recovery issues.
- 4.3 The full cost recovery analysis will need to factor in the cost of processing payments and that some payment methods are preferred.

5. Equality impact Assessments

- 5.1 Under Section 149 of the Equality Act 2010, the Council has a duty when exercising its functions to have 'due regard' to the need to eliminate discrimination and other conduct prohibited under the Act and advance equality of opportunity and foster good relations between those who share a "protected characteristic" and those who do not. This is the public sector equality duty. The protected characteristics are: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation. The purpose of the duty is to enquire into whether a proposed decision disproportionately affects people with a protected characteristic. In other words, the indirect discriminatory effects of a proposed decision. Due regard is the regard that is appropriate in all the circumstances.
- 5.2 Before the Council exercises its fees and charging powers, the impact on individuals or groups of individuals who share a protected characteristic must be carefully considered and properly factored into the decision making process using the Council's EA screening template.

6 Review of Policy

- 6.1 This Policy is to be reviewed a minimum of every two years to ensure consistency with wider council and departmental objectives and priorities.

Fees and Charges - Legal Powers

Under the Localism Act 2011 there is a general power of competence which explicitly gives councils the power to do anything that an individual can do which is not prohibited by other legislation. This activity can include **charging** (i.e. to recover the costs of providing a discretionary service which the person has agreed to) or can be undertaken for a commercial purpose (i.e. to generate efficiencies, surpluses and profits) through a special purpose trading company. This is what is more commonly known as **trading**. Charging and trading activities can be aimed at benefiting the Council, the borough or its local communities.

These powers are in addition to similar powers set out in the Local Government Act 2003. The 2003 Act empowers councils to charge for any discretionary services (i.e. services councils have the *power* to provide but do not have a *duty* to provide by law) on a cost recovery basis. For example, the Council could decide to provide a new discretionary service, that is an addition to or enhancement of a statutory service, and then charge for it.

The 2011 Act power and the 2003 Act power cannot be used where charging is prohibited or where another specific charging regime applies. Statutory guidance published in 2003 outlines how costs and charges should be established and that guidance remains in force (see: '*General Power for Best Value Authorities to Charge for Discretionary Services*', ODPM, 2003). The Council must have regard to the guidance when charging for discretionary services under the 2003 Act.

In particular, the guidance contains useful advice on setting charges. It explains that for each discretionary service for which a charge is made, councils need to secure that, taking one year with another, the income from charges for that service does not exceed the costs of provision. The requirement to take one year with another recognises the practical difficulties council will face in estimating the charges. It establishes the idea of balancing the books over a period of time (not less than 1 year and no more than 3 years). Any over or under recovery that results in a surplus or deficit of income in relation to costs in one period should be addressed by the council when setting its charges for future periods so that over time income equates to costs.

The 2003 Act also enables councils to trade in activities related to their functions on a commercial basis with a view to profit through a company.

Under the Local Authorities (Goods and Services) Act 1970 councils also have powers to enter into agreements with each other and a long list of designated bodies. These activities are not limited to cost recovery and a profit can be generated from these activities.

In terms of leisure and recreational facilities, section 19 of the Local Government (Miscellaneous Provisions) Act 1976 permits councils to charge for these beyond cost recovery limitations.

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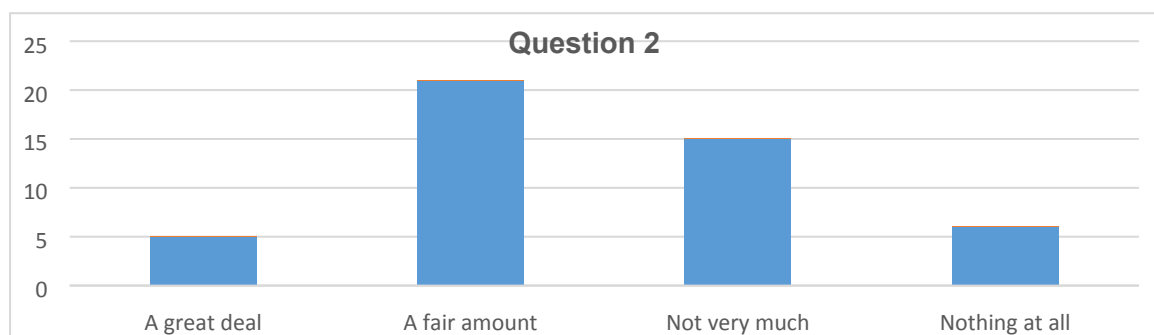
Budget Consultation- Summary of findings and key themes

The Budget 2020/21 - 2022/23 online consultation opened on 12 November 2019 and is due to close on 31 January 2020.

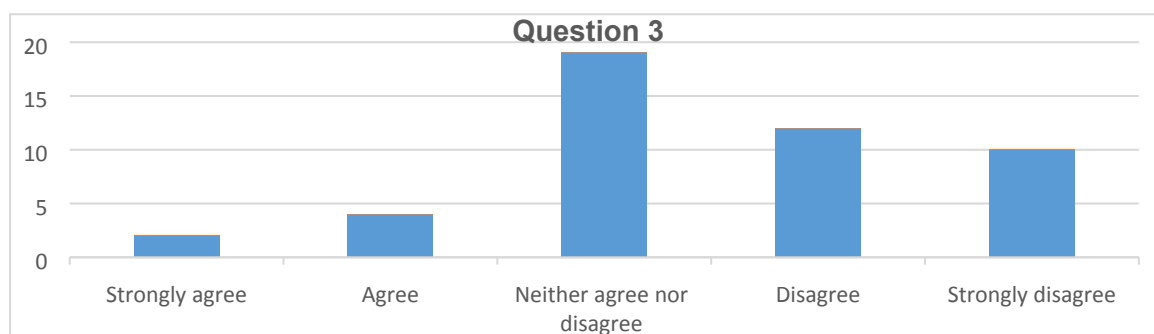
The online consultation asked Brent residents to read the Draft Budget 2020/21 – 2022/23, including appendices, and answer the following questions:

1. Do you have any comments about our draft budget strategy?
2. Having read the draft budget proposals for the next three years, how much do you now feel you understand the Council's overall financial position and the need to both increase council tax and deliver savings between 2020/21 and 2022/23 in order to deliver a balanced budget?
3. To what extent do you agree or disagree with the budget proposals?
4. If you have any specific ideas about how the council can save money or generate additional income to protect services, please state these here:

For **Question 2** 64% of respondents answered that they had 'a fair amount' or 'a great deal' of understanding of the Council's overall financial position and the need to both increase council tax and deliver savings between 2020/21 and 2022/23 in order to deliver a balanced budget. 36% responded that they had 'nothing at all' or 'not very much' understanding of the Council's overall financial position.



For **Question 3** 42% of respondents answered that they 'disagree' or 'strongly disagree' with the budget proposals. Whilst 18% answered that they 'agree' or 'strongly agree' with the proposals. The final 40% answered that they 'neither agree nor disagree'.



The key themes collected from the comments to **Question 1** '*Do you have any comments about our draft budget strategy?*' include:

- Reducing Anti-Social Behaviour, in particular street crime and fly tipping
- Protecting Children's services
- Repairing potholes
- Increasing CCTV
- Protecting green spaces
- Planting more trees

The most popular theme, was protecting green spaces and planting more trees (40%). Improvements to highways (7%) and Anti-social behaviour (7%) were also common themes.

In regards to protecting green spaces and planting more trees, one respondent stated:

'I would like to see Highways and Infrastructure to commit the 100k saving in 21/22 - to be shared between better maintenance of trees, and replacement of removed trees and better cycling provision. I understand there is a 215k saving in Environment, please use this to fulfil the councils obligations under the Climate Emergency Declaration, by making maintenance of the borough's tree stock a priority.'

Another respondent stated:

'I'd like to see the council using savings in areas such as highways to invest in the maintenance and upkeep of existing tree stock and to plant more new trees. The latter need to have funds allocated to them so that they can be protected - cages built around vulnerable ones, an effort made to ask specific households to water them - and inspected regularly to make sure the saplings do not die and waste resources.'

The most popular theme to **Question 4** '*If you have any specific ideas about how the council can save money or generate additional income to protect services, please state these here:*' was to protect Council staff (7%) and investment in trees (21%).

Another respondent stated:

'Need more social service staff allocation for elderly living at home.'

In regards to Improvements to highstreets, one respondent stated:

'Please pass on savings from the highways and infrastructure budget on to protecting the councils trees. As well as improving local pollution and the health of Brent residents, this will also help the council to fulfill its pledge to tackle the climate emergency.'

Comments and feedback on the budget consultation demonstrates a wide range of views, many common viewpoints and emphasises the fact that Brent residents are concerned over what the expenditure reductions mean not only for them but also for the wider community.



Appendix N
BRENT COUNCIL PAY POLICY
STATEMENT

Financial Year 2020/21

April 2020

Contents

Purpose.....	3
Strategic Context.....	3
Employee Benefits	4
Pay Rates and Scales.....	4
Remuneration of Senior Management (Chief Officers)	4
Remuneration of Lowest Paid Employees	5
London Living Wage	5
Pay Multiple	5
Job Grading.....	6
Local Conventions for the GLPC Job Evaluation Scheme	6
Public Health Transfer.....	7
Pay on Appointment.....	7
Annual Pay Progression.....	7
Performance Related Pay and Bonuses	8
National / Regional Pay Agreements	8
Market Supplements	9
Fees for Election Duties	9
Pensions	9
Payments on Termination of Employment	9
Re-employment of Employees	9
Tax avoidance.....	10
Publication and access to information.....	10

BRENT COUNCIL PAY POLICY STATEMENT

Financial Year 2019/20

Purpose

The council's pay policy outlines Brent's policy on pay and benefits for all employees (excluding Schools) and has been developed to meet the relevant statutory provisions of the Localism Act 2011.

The pay policy will be reviewed on an annual basis and will be approved by Full Council in advance of each new financial year.

The pay policy statement can be amended during the course of any financial year, but only by a resolution of the Full Council. The revised version of the statement will be published as soon as reasonably practicable.

Strategic Context

The current and future pay and benefit arrangements are embodied in the council's Workforce Strategy which reflects the Borough Plan priorities. The council's Borough Plan provides the strategic framework for the council's workforce and people priorities.

The overarching objective for the Workforce Strategy is to have the right people, with the right skills, attitudes and experience, in the right place at the right time to enable the organisation to deliver on its strategic priorities and corporate objectives.

Key strategic aims of the Workforce Strategy are:

- Achieving organisational effectiveness and strong performance management.
- Recruiting, retaining and rewarding a diverse, highly skilled and motivated workforce.
- Valuing diversity and reducing inequalities.
- Developing high performing managers and talented staff.
- Building the professionalism and skills of the workforce to support projects aligned to the council's strategic priorities and the delivery of high quality services.

The council is committed to being a good employer and maintaining its excellent track record in employing a diverse workforce which reflects the local community. In order to recruit and retain a high quality workforce, the council will pay its staff at appropriate salary levels to attract and retain staff, throughout the council, particularly those in hard to recruit roles.

Employee Benefits

The council's pay arrangements and terms and conditions play a key role in enabling the council to fully realise its objectives and ensuring the workforce is 'fit for purpose'. The council is committed to fair and equitable pay and benefits arrangements to maintain a flexible, talented and performance focused workforce. The council published its Gender Pay Gap Report on 29 March 2019. This revealed that the overall mean gender pay gap based on data taken from the HR databases on 31 March 2018 was 8.2% and the median gender pay gap was 6.8%. This compares with a mean gender pay gap for local government of 6.1% and a median pay gap of 4% %.

All the council's pay arrangements are contained within a single policy document.

Pay Rates and Scales

Pay scales are reviewed annually in line with the relevant national agreements and any changes are usually effective from 1 April or 1 September each year depending on the pay scales applicable to different groups of staff.

The following pay scales have been adopted by the council:

- Greater London Provincial Council (GLPC) London Pay Scales (main pay scales)
- Senior Manager Pay Scales (senior managers including Chief Officers)
- Soulbury Pay Scales (Education Psychologists, Advisors and Inspectors)
- Soulbury Pay Scales (Youth and Community Service, Young People and Community Service Managers)
- Teaching Pay Scales (for centrally employed local authority teachers)

Remuneration of Senior Management (Chief Officers)

The council defines its senior management as the top 3 tiers in the management structure. This includes all statutory and non-statutory Chief Officers and Deputy Chief Officer roles. It comprises the Chief Executive, Strategic Directors and Operational Directors.

Currently the pay, expenses and key benefits for the Council Management Team are published on the council's website. The Council Management Team comprises the Chief Executive and the Strategic Directors, together with the Director of Finance and the Director of Legal, HR & Audit and Investigations.

The rates of pay of the Chief Executive and Strategic Directors and other Senior Managers are in accordance with the council's senior manager pay scales.

The council may, from time to time, engage senior managers under contracts for services. The council generally will aim to pay such individuals at a rate consistent with the pay of directly employed staff performing a comparable role, although there may be exceptional circumstances which support a higher pay rate for a short term period to ensure continuity of service and meet any statutory obligations.

Remuneration of Lowest Paid Employees

The council defines its lowest paid employees as those staff paid on the lowest established grade and scale point which in Brent is Scale 3 spinal point 17 of the Greater London Provincial Council (GLPC) Pay Scales currently £20,472 per annum.

London Living Wage

The council has implemented the London Living Wage. All staff are paid at or above the London Living Wage. Level 2 Apprentices are paid at the highest National Living Wage rate for apprentices, Level 3 Apprentices are paid a higher hourly rate of £8.01 per hour and Level 4 Apprentices are paid at a higher hourly rate. The Council is an accredited London Living Wage Employer and asks its contractors supplying services to the Council to pay their staff the London Living Wage. As contractors are employers in their own right, the council cannot force contractors to pay the London Living Wage but has built into its procurement procedures a requirement to do so in relation to council contracts where possible. The Council also encourages schools to pay the London Living Wage.

Pay Multiple

The 'pay multiple' is the ratio between the highest paid salary and the lowest/median average salary of the council's workforce. The council's highest paid employee is the Chief Executive. The current median salary is £35,724.

The lowest pay multiple is 1:9.7; the median pay multiple is 1:5.6.

This is within what is regarded as good practice for the median salary multiple as described by Will Hutton in his 2011 Fair Pay Review in the Public Sector which identified multiples at or around 8.00. The council has not set a target for a maximum multiple. The lowest pay multiple has decreased from 1:10:6 in 2016/2017 and 1:9.99 in 2017/18.

Job Grading

Single Status was introduced in 2009 for staff on the main pay scales. Single Status introduced common job evaluation schemes and pay scales for the council's former manual workers, administrative, professional, technical and clerical employees with the exception of education psychologists, nursery nurses, youth and community workers, chief officers and the chief executive.

Staff who transferred to the council from Brent Housing Partnership in 2017 have not yet moved over to Single Status.

Senior managers including chief officers have locally determined rates of pay which are linked to national negotiations for the determination of pay awards. A revised pay and grading structure for senior managers was introduced on 1 April 2013. The aim of the review was to reduce costs whilst ensuring the council's pay arrangements remained competitive.

Also in 2013, the council rationalised the terms and conditions for senior managers. Those senior management posts which fall within the Joint National Committee (JNC) Chief Officer definition are employed on JNC terms and conditions and all other senior managers are employed on National Joint Committee (NJC) for Local Government Services terms and conditions with some local variations. The senior management posts which fall within the JNC definition are predominately the strategic directors and other directors with statutory responsibilities e.g. Section 151 officer. This means that the majority of senior managers have terms and conditions which are largely consistent with those for other staff. A number of changes were also made to the JNC for Chief Officer terms and conditions to align them more with the terms and conditions for all other staff.

Local Conventions for the GLPC Job Evaluation Scheme

Virtually all local authorities and organisations that use the GLPC Scheme have local conventions in place. A convention is the term given to the local interpretation of the wording of a job evaluation scheme, which are usually written down. Without local conventions, evaluators may interpret the scheme's factor level definitions differently.

This exposes the authority to the potential risk of inconsistency and can lead to inaccurate gradings.

The council in March 2013 introduced local conventions to ensure that the scheme is applied consistently and fairly to all employees. These have been reviewed and amended in accordance with refreshed guidance notes on the job evaluation scheme issued by the GLPC in 2016.

Public Health Transfer

Following major changes to the public health system, responsibility for public health transferred to local authorities on 1 April 2013. Fifteen staff transferred into the council under NHS terms and conditions including pay, seven of which are still employed by Brent. A Director of Public Health was recruited on Brent terms and conditions.

Pay on Appointment

All employees are normally appointed on the lowest pay spinal column point for their job evaluated grade. Employees may be appointed at a higher point, where they are currently earning more than the lowest pay spine for the role and/or where it is considered that they already possess the skills and experience needed to justify a higher salary within the grade. Appointment at a higher point on the salary scale has to be authorised by the service Operational Director and the Head of HR or operational director responsible for HR.

The council delegates authority to the Senior Staff Appointments Sub-Committee to make appointments to the council of all officers at Operational Director level and above, with the exception of the Chief Executive, in which case a recommendation to appoint is made to Full Council for its final decision to confirm the appointment or not. The starting salary for new appointments to these posts is agreed by the body making the appointment. The starting salary for any other post where the overall remuneration package on new appointment (excluding pension contributions in accordance with the Local Government Pension Scheme regulations) is to exceed £100,000 will normally be agreed by full council or a committee of the council unless the Chief Executive agrees otherwise.

Annual Pay Progression

Brent's pay policy is primarily based on evaluated pay grades, each having a salary range comprising a number of incremental points. Other pay grades are nationally prescribed and also have incremental progression arrangements. Most employees incrementally progress through the pay grade for their job. Progression will normally be one increment (pay spine column point) on the 1st of April each year until the top of the grade is reached for those on the main pay scales. Separate arrangements

apply during the first year of service where the start date is between 1 October and 31 March and on the anniversary of joining for those on senior manager pay scales.

Pay progression takes place on an annual basis and can be withheld if there is a disciplinary sanction or where performance is currently being addressed.

Performance Related Pay and Bonuses

Council employees including the Chief Executive and directors do not receive performance related payments or bonuses.

National / Regional Pay Agreements

The council operates the national (JNC/NJC) and regional (GLPC) collective bargaining arrangements for pay and conditions of service for all employees, including senior managers. Pay is increased in line with national and regional pay agreements.

Details of the JNC 2018/19 pay award agreement are:

From 1 April 2018:

- ☐ Salary increases of 2% applied to all spinal column points.

From 1 April 2019:

- ☐ Salary increases ranging from 2% to 2.8%. Most grades received a 2% increase with higher percentage increases applying only to the lowest paid staff.

The individual basic salaries and salary scales of all officers within scope of the JNC for Chief Officers of Local Authorities increased by 2% with effect from 1 April 2018 and increased by a further 2% with effect from 1 April 2019.

Market Supplements

The council re-introduced a market supplement policy in 2018 and the General Purposes Committee has agreed recruitment and retention allowances for some social work staff. Individual service areas do not have discretion to apply market supplements or other recruitment and retention payments and there is a governance structure in place to agree any new supplements based on a sound business case.

Fees for Election Duties

Election fees paid to employees (including chief officers) who assist in elections are in line with the rates agreed by the Government whenever general, regional or European elections occur. Where local elections occur fees will be determined using the cross-London agreed rates.

Pensions

All non-teaching employees are able to join the Local Government Pension Scheme (LGPS). Teachers are able to join the Teachers' Pension Scheme. Benefits for both schemes are paid in accordance with government regulations. National Health Service employees who transferred to the council under TUPE have access to the NHS Pension Scheme under special provisions agreed as part of the transfer into local government. Employees joining Public Health after the transfer are employed on Council terms and conditions and do have access to the LGPS.

Payments on Termination of Employment

In the event that the council terminates the employment of an employee on the grounds of redundancy the terms of the council's redundancy and early retirement arrangements will apply. Termination payments will be subject to any caps and/or repayment requirements introduced by government legislation. It is anticipated that regulations on capping payments and repayment of severance will be introduced although the timescale is unclear. Where practicable, and unless the Chief Executive agrees otherwise, termination payments which exceed £100k will normally be agreed by full council or a committee of the council.

Re-employment of Employees

Section 7 of the Local Government and Housing Act 1989 requires that every appointment to paid office or employment in a local authority shall be made on merit.

The re-engagement of employees including chief officers who are made redundant is subject to the council's re-engagement arrangements (contained within the council's

Managing Change Policy). The policy sets out the minimum period a former employee must wait before being eligible to work for the council again, as well as outlining other restrictions.

Employees who are made redundant may not be re-engaged within twelve months of their termination of employment for reasons of redundancy. After twelve months the employee may be re-engaged via the normal recruitment procedures either to carry out similar work or a different job. Re-engagement is subject to the approval of the relevant Operational Director and Director of Legal, HR and Audit & Investigations.

Tax avoidance

All permanent Brent staff including senior managers are paid through payroll which means that all taxes are deducted at source. A review of temporary staff is regularly conducted and it is Brent's policy to cover vacancies through the use of approved agency workers or by appointing staff on fixed term contracts. Temporary workers providing services through their own companies will be carrying out projects and generally not covering permanent roles other than in exceptional circumstances e.g. where interim cover is essential whilst a permanent appointment is recruited. Where these situations do occur they will be limited in duration, usually to less than 6 months.

The council's approach to dealing with Her Majesty's Revenue and Customs' (HMRC) changes to regulations for provision of personal services from April 2017 is to use the HMRC online assessment tool to determine the employment status of individuals for income tax purposes. Most agency workers, consultants and interims are required to pay tax on a PAYE basis, like council employees.

Publication and access to information

Brent's annual Pay Policy Statement will be published on the website where it can be easily accessed. Information about chief officers' remuneration is published on the council's website www.brent.gov.uk in the section Senior Managers' pay.

COUNCIL TAX SETTING COMMITTEE

Membership

The committee comprises of the five councillors (four labour and one conservative).

Terms of Reference

This committee is established under section 67 of the Local Government Finance Act 1992:

1. To note the annual budget 2020/21 for Brent agreed by Full Council.
2. To note the formal resolution by Full Council for Brent council tax in 2020/21.
3. To note the Greater London Authority precept level for 2020/21.
4. As a consequence, to set an amount of council tax for the financial year 2020/21 in accordance with Section 30 Local Government Finance Act 1992.
5. To agree the formal resolution for council taxes in 2020/21.

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LONDON BOROUGH OF BRENT

Full Council – 19 February 2020

Result of by-elections held in the Wards of Alperton, Barnhill and Wembley Central on Thursday 23 January 2020

ALPERTON WARD

Candidate Name:	Description (if any):	Number of Votes Recorded:
GEORGIU , Anton	Liberal Democrats	1,699
HARPALE , Chetan	Labour Party	1,304
VYAS , Harmit Anil	The Conservative Party Candidate	900
LINNIE , Andrew James Edward	Green Party	373

Candidate Elected to represent the Alperton ward (who has signed the Declaration of Acceptance of Office):

- **GEORGIU**, Anton (Liberal Democrats)

BARNHILL WARD

Candidate Name:	Description (if any):	Number of Votes Recorded:
AKRAM , Mansoor	Labour Party	1,194
BROOKE , Michael David	Liberal Democrats	118
FRANCIS , Martin Roger	Green Party	231
LLOYD , Gaynor	Labour Party	1,152
MISTRY , Kanta	The Conservative Party Candidate	1,082
MURRY , Peter Richard	Green Party	171
NGAN , Larry	Liberal Democrats	76
VOLOSENIUC , Stefan	The Conservative Party Candidate	1,018

Candidates Elected to represent the Barnhill ward (both of whom have signed the Declaration of Acceptance of Office):

- **AKRAM**, Mansoor (Labour Party)
- **LLOYD**, Gaynor (Labour Party)

WEMBLEY CENTRAL WARD

Candidate Name:	Description (if any):	Number of Votes Recorded:
MADABHUSHI , Sai Karthik	The Conservative Party Candidate	1,090
PATEL , Jyotshna	Liberal Democrats	378
RELTON , William Kent	Green Party	154
SHAH , Sonia	Labour Party	1,945

Candidate Elected to represent the Wembley Central ward (who has signed the Declaration of Acceptance of Office):

- **SHAH**, Sonia (Labour Party)

 Brent	Full Council 19 February 2020 Report from the Director of Legal HR Audit & Investigations
Representation of Political Groups on Committees	

Wards Affected:	All
Key or Non-Key Decision:	Non-key
Open or Part/Fully Exempt: (If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)	Open
No. of Appendices:	One: Appendix 1: Political Balance Regulations
Background Papers:	None
Contact Officer(s): (Name, Title, Contact Details)	James Kinsella, Governance Manager, Executive & Members Services Tel: 020 8937 2063 Email: james.kinsella@brent.gov.uk or Tel:

1.0 Summary

- 1.1 As a result of the three Council by-elections held in the Alperton, Barnhill and Wembley Central wards on 23 January 2020 there is now a requirement for the Council to undertake a further review of the representation of different political groups on certain committees. Having undertaken the review, the Council then has a duty to make appointments (where necessary) to those committees giving effect to the wishes of the political group allocated the seats.

2.0 Recommendations

- 2.1 Full Council:
- (i) agree the size of each existing committee remains unchanged as set out at paragraph 3.8 and that the new Council Tax Setting Committee will have 5 seats as set out at paragraph 3.10;
 - (ii) confirm (where the rules of political balance apply) the allocation of seats on committees to each of the Council's political groups as set out in the report;

- (iii) make appointments, where required, to those committees giving effect to the wishes of the political group allocated the seats;
- (iv) note that the political balance on sub-committees will be reviewed at the first available meeting of the General Purposes Committee and the Licensing Committee.

3.0 Detail

Representation of Political Groups

- 3.1 The Council is required to review the representation of different political groups on certain committees, as soon as practicable, in specified circumstances. These circumstances include a change in Council membership and the balance of political groups.
- 3.2 As soon as practicable after the review, the Council then has a duty to determine the allocation to the different political groups of all seats on the relevant committees. The allocation is determined by applying the “political balance rules” prescribed by the Local Government and Housing Act 1989 and supplemented by the Local Government (Committees and Political Groups) Regulations 1990. These rules are set out in Appendix 1 to this report and are designed to ensure that the political composition of the Council’s decision-making and deliberative committees, as far as possible, replicates the political composition of Full Council. Subsequently, the Council has a duty to make appointments to those committees giving effect to the wishes of the political group allocated the seats.
- 3.3 The Committees that the political balance rules apply to have similar duties in relation to any sub-committees they may have.
- 3.4 The Membership of the Council stands at 63 councillors with the composition of political groups following the recent by-elections as follows:

59 Labour Group councillors (93.65%) and 3 Conservative Group councillors (4.76%).
- 3.5 According to the political balance rules, a political group for this purpose is a group of two or more members. As a result of the by-election in Alperton ward, the Council’s membership now also includes one Liberal Democrat councillor, representing 1.59% of the total composition of the Council. In light of the rules relating to political balance, it will not be possible to treat this single member as having formed a political group for the purposes of the review.
- 3.6 The table below sets out the 5 ordinary committees of the Council which the political balance rules apply to along with:
 - the size of each committee (excluding any non-voting co-opted committee members in accordance with the political balance rules);
 - the total number of seats required to be allocated; and

- the number of seats each political group is strictly entitled to based on the number of group members and any adjustments required by the political balance rules.

3.7 There are a total of **38** ordinary committee seats to which the political balance requirements will formally apply. Whilst the membership of the Labour Group now stands at 59 (which constitutes 93.65% of the total membership of the Council), the proportion of seats the group is strictly entitled to remains (as with the last review undertaken in May 2019) **36**. However, as the political balance rules do not allow all the seats on a committee to be allocated to the same political group, at least **5** seats have to be allocated to the other political group. This will result, as before, in a final allocation of **33** seats to the Labour Group.

3.8 The Conservative Group are strictly entitled (based on the size of the group) to an allocation of **2** seats. However, as the Labour Group can only be allocated **33** and not 36 seats, the **3** remaining seats (as with the previous review undertaken in May 2019) have to be allocated to the opposition group.

Ordinary Committees	Size	Labour Group 59 93.65%	Conservative Group 3 4.76%	Liberal Democrat 1 1.59%
General Purposes Committee	8	7	1	0
Planning Committee	8	7	1	0
Audit & Standards Committee	7	6	1	0
Corporate Parenting Committee	5	4	1	0
Licensing Committee	10	9	1	0
Total seats	38			
Strict Entitlement (based on a proportion of total members)		36	2	0

Final Allocation (based on the political balance rules)		31 (-3)	5 (+3)	0

3.9 There are other committees which the political balance rules apply to, but only principles (a), (b) and (d) (see Appendix 1, paragraph 3). Namely, the existing Scrutiny Committees, the Audit & Standards Advisory Committee and the Council Tax Setting Committee.

3.10 The table below confirms the size and make-up of these Committees. The Conservative Group is entitled to be allocated the single opposition group seat on all four Committees.

Other Committees	Size	Labour Group 59 93.65%	Conservative Group 3 4.76%	Liberal Democrat 1 1.59%
Community and Wellbeing Scrutiny Committee	11 (plus 4 voting co-opted members and 2 non-voting co-opted members)	10	1	0
Resources and Public Realm Scrutiny Committee	11	10	1	0
Audit & Standards Advisory Committee	7 (plus up to 5 voting co-opted members)	6	1	0
Council Tax Setting Committee	5	4	1	0

3.11 Subsequent to allocating seats, the Council has a duty to make appointments to the specified committees giving effect to the wishes of the political group allocated the seats. Notwithstanding the establishment of the Council Tax Setting Committee, this review has not lead to any change in the overall allocation of seats on Committees following the last review undertaken in May, but should the political groups be minded to change their membership on any of the committees, these will be detailed under the Appointments to Committees item on the agenda.

- 3.12 The political balance rules do not apply to the Health and Wellbeing Board but it has been previously agreed that this Board will comprise 4 Cabinet Members and 1 opposition Member and this will continue following this review.

4.0 Financial Implications

- 4.1 There are no financial implications arising directly from this report.

5.0 Legal Implications

- 5.1 These are addressed in the body of the report.

6.0 Equality Implications

- 6.1 None.

Background Papers

None.

Report sign off:

DEBRA NORMAN

Director of Legal, HR Audit &
Investigations

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Appendix 1

The political balance rules prescribed by the Local Government and Housing Act 1989 ('the Act') and the Local Government (Committees and Political Groups) Regulations 1990 ('the 1990 Regulations')

1. The rules are that seats on relevant committees must be allocated to different political groups so far as reasonably practicable in accordance with the following four principles:
 - (a) that not all the seats on the body are allocated to the same political group;
 - (b) that the majority of the seats on the body is allocated to a particular political group if the number of persons belonging to that group is a majority of the Council's membership;
 - (c) subject to paragraphs (a) and (b) above, that each political group is allocated the same proportion of the total seats across all the ordinary committees of the Council as the proportion of the members of the Council that belong to that group; and
 - (d) subject to paragraphs (a) to (c) above, that each political group is allocated the same proportion of the seats on each relevant body as the proportion of the members of the Council that belong to that group.
2. Principle (c) refers to "ordinary committees" which under the Act means those appointed under section 102(1)(a) of the Local Government Act 1972, namely General Purposes Committee, Audit & Standards Committee, Corporate Parenting Committee, Planning Committee and Licensing Committee.
3. Principles (a), (b) and (d) apply to a "body" to which the Council makes appointments. The Act provides that the bodies to which this principle applies include ordinary committees (as defined above) and ordinary sub committees, advisory committees and sub-committees, and joint committees where at least 3 seats are filled by appointments made by the Council.
4. Principles (a), (b) and (d) therefore apply to the Scrutiny and Audit and Standards Advisory Committee. Strictly speaking, according to principle (b), the Labour Group is entitled to a majority of the seats on the Committee. However, to maintain the current size of the Committee, Full Council can depart from the rules provided no member votes against the proposal.
5. By virtue of the Local Government Act 2000, principles (a), (b) and (d) also apply to the Scrutiny Committees.
6. According to principle (c) above, the General Purposes Committee, Audit & Standards Committee, Corporate Parenting Committee, Planning Committee and Licensing Committee first have to be taken together to determine the *number* of seats that should be allocated to each group. Then, in accordance with paragraph (d) above, the number of seats each political group is entitled to has to be allocated proportionately to individual committees so far as possible.
7. The political balance principles do not apply to the London Councils' Joint Committees or the Joint Health Overview and Scrutiny Committee because only one appointment on each Committee is made by the Council.

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 Brent	Full Council 19 February 2020
	Report from the Strategic Director of Regeneration and Environment
BRENT LOCAL PLAN SUBMISSION FOR EXAMINATION	

Wards Affected:	All, excluding parts of Harlesden, Kensal Green, Stonebridge and Tokyngton where Old Oak and Park Royal Development Corporation is the Local Planning Authority
Key Decision:	Yes
Open or Part/Fully Exempt: (If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)	Open
No. of Appendices:	Appendix 1: Draft Brent Local Plan Appendix 2: Draft Brent Local Plan Policies Map Appendix 3: Summary of representations received and officer responses Draft Brent Local Plan Appendix 4: Schedule of Modifications to the draft Brent Local Plan Appendix 5: Draft Brent Local Plan Integrated Impact Assessment
Background Papers:	None
Contact Officer(s): (Name, Title, Contact Details)	Paul Lewin, Team Leader, Planning Policy 020 8937 6710 paul.lewin@brent.gov.uk

1.0 Purpose of the Report

- 1.1 This report seeks Council consideration of the representations received on the draft Brent Local Plan and approval for its submission for Examination by a Planning Inspector appointed by the Secretary of State.
- 1.2 It also seeks delegation of authority to approve modifications required to the draft Local Plan, necessary to ensure that it can be found 'sound' by the Planning Inspector, to the Strategic Director Regeneration and Environment in association with the Cabinet Member for Regeneration, Property and Planning.

- 1.3 Subsequent to receipt of a positive report from the Planning Inspector's, Full Council will be requested to consider a report recommending adoption of the Brent Local Plan.

2.0 Recommendations

- 2.1 Full Council approves submission of the draft Brent Local Plan as set out in Appendix 1 and Policies Map as set out in Appendix 2 for examination, together with associated Proposed Modifications as set out in Appendix 4 and the Integrated Impact Assessment as set out in Appendix 5.
- 2.2 Full Council endorses the Officer responses to representations as set out in Appendix 3.
- 2.3 Full Council delegate authority to the Strategic Director Regeneration and Environment in association with the Cabinet Member for Regeneration, Property and Planning to make proposed modifications to the Brent Local Plan throughout the examination process to ensure that it can be found 'sound' by the Planning Inspector.

3.0 Draft Brent Local Plan – stages to date

- 3.1 Cabinet considered a paper on 13th February 2017 'Updating Brent Council's Planning Strategy (The Local Plan) that set out the process of updating the Council's statutory town planning policies. The processes have to be consistent with the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 3.2 Since mid-2017, a significant amount of work has gone into shaping the draft Brent Local Plan. This will replace all of the existing Brent Local Plan documents, including the Brent Core Strategy 2010, Sites Allocations Development Plan Document 2011, Wembley Area Action Plan 2015 and Development Management Policies Local Plan 2017.
- 3.3 There have been four stages of engagement with the public to date. The first three were consistent with Regulation 18 'Preparation of a Local Plan':
- Mid-August until the end of 2017: informal focussed workshops with residents and other interested parties across the borough. This sought to set out some of the challenges and opportunities related to planning for accommodating Brent's predicted population growth. It captured what people considered important about their area and where they thought there was potential for development to meet these population needs and improve Brent. The main issues are set out in a [consultation summary](#) for that stage.
 - 'Issues and Options' consultation, February-March 2018: the second stage of consultation that occurred for 6 weeks, key issues raised are set out in the associated [consultation summary](#)
 - 'Preferred Options' consultation, November 2018-January 2019: the third stage of consultation that took place across the borough for 8 weeks. It took into account previous consultation responses. The main issues raised are set out in a [consultation summary](#). In addition, fuller responses to each point raised and how the Plan has been amended if necessary are [available to view](#) for those that made representations.

- 3.4 Throughout these early stages of consultation overall, the draft Plan was well received. The wider community recognised the need to meet the existing needs of the population, particularly the need for additional affordable, family and specialist homes. There were however concerns about the predicted growth of the population, and its impacts on infrastructure. Many communities were concerned about existing access to facilities, which were perceived to be inadequate or at full capacity. Whilst most welcomed the investment that has come in regenerating Brent, there are also concerns about potential change in character and loss of green space.
- 3.5 A Local Plan Members' Liaison Group consisting of 10 members from across the borough, including the Cabinet Member and Chair of Planning has met regularly throughout the Local Plan drafting process. It has acted as a sounding board/ critical friend related to the communication/ engagement process, contents and form of the draft document throughout its various stages to date.
- 3.6 The most recent, fourth stage of consultation of the Plan has been consistent with Regulation 19, Publication of a Local Plan. Cabinet approved the publication of the draft Brent Local Plan on 14th October 2019. The period for submission of representations was from 24th October – 5th December 2019, with a focus at this stage on whether the Plan is 'sound'. The tests of soundness are set out in the National Planning Policy Framework. They are that Plans should be:
- a) **Positively prepared**, that is as a minimum meeting all the area's identified needs;
 - b) **Justified**, being an appropriate strategy taking account of reasonable alternatives, and based on proportionate evidence;
 - c) **Effective**, being deliverable over the plan period and based on effective joint working; and
 - d) **Consistent with national policy**, enabling delivery of sustainable development.

Draft Brent Local Plan – format and content

- 3.7 Consistent with national policy, the draft Brent Local Plan as shown in Appendix 1 with its associated policies map in Appendix 2 has sought to complement higher-level policy of the National Planning Policy Framework and the emerging draft London Plan. The Mayor has submitted his Intend to Publish version of the emerging London Plan to the Secretary of State. It might therefore be subject to further change, but will be part of the development plan prior to the conclusion of the examination of the draft Brent Local Plan. It is a statutory requirement for Brent's Local Plan to be in general conformity with the adopted London Plan. Consistent with national policy requirements, the draft Local Plan does not repeat higher-level policy. As such, it makes suitable reference to relevant policies in the emerging London Plan in particular, to make it easier for users to see the relationship between the two documents. It also takes account of and refers to the Sudbury and Harlesden Neighbourhood Plans, which also form part of the development plan, at relevant points.

- 3.8 The Plan sets out policies for the development of the borough to 2041, and for some development beyond. Over this time, the borough will continue to see a significant increase in its population, similar to levels seen over the last 20 years. This will require a substantial amount of new homes, jobs and associated physical and social infrastructure.
- 3.9 The draft Brent Local Plan has a vision, takes the emerging London Plan's good growth policies and makes them locally relevant to Brent. It splits the borough up into 7 places. The boundaries of these places have been based on a number of factors including town centre catchments, physical features such as roads, railway lines and neighbourhoods. This is to make the Plan more relevant at a local level to communities. For each of these places it outlines the challenges and opportunities, sets out a vision and related policy to deliver the vision. It has policies for specific site developments. It then also has specific theme policies consistent with those of the London Plan. As with the current Brent Local Plan, the major places of change will be Growth Areas. The Plan identifies 3 new Growth Areas at Northwick Park, Staples Corner and Neasden Station. The existing Growth Areas all have additional development opportunities identified and in some cases are extended.
- 3.10 It addresses the significant challenges that the council faces, in particular around meeting the needs of the predicted growth in the borough's population. It seeks to meet the housing needs of Brent and wider London by planning for the current draft London Plan target 2019/20-2028/29 of 23,250 dwellings, whilst identifying further capacity in the period to 2041. This is the amount that can be shown to be deliverable based on known sites and reasonable estimates of 'windfall' sites. It takes account of the recommendations of the Affordable Housing Task Group Report January 2019. In doing so, it takes forward the council's strategic target of 50% affordable homes, whilst accepting the Mayor's fast track approach of a lower target in the meantime as a stepping stone to reaching the 50%. The affordable housing tenure split sought is 70% London Affordable Rent (equivalent to new build council) 30% intermediate including shared ownership, discount rent and discount sale. It seeks an affordable housing contribution in lieu of on-site provision for developments of 5-9 dwellings. It seeks to ensure specialist housing and family housing are delivered as part of larger developments.
- 3.11 The Plan seeks to ensure that existing industrial areas are protected and jobs increased through intensification of wholly business floorspace, or as part of mixed-use developments. Town centres are promoted as the priority location for main town centre uses, whilst flexibility is allowed to ensure that they can change and diversify to meet the challenges caused by changes in shopping habits. As is currently the case, policies to limit takeaways, shisha bars, betting shops payday loans and pawn brokers are also included.
- 3.12 The priority locations for tall buildings are identified, along with indicative heights. Policies seek to retain the borough's best historic environments, whilst more detail is set out on addressing the National stadium's future and protecting views of its setting. The borough's open spaces are protected, along with policies for seeking new spaces and bio-diversity in association with development. Policies to address climate change through control of water and the energy requirements of new development and to improve air quality are also included. The Plan complements the council's transport strategy of prioritising more sustainable movement over that of the private vehicle.

- 3.13 Policies protect social infrastructure but also through extensive engagement with bodies such as the Clinical Commissioning Group and the Council's children's and young people division set out when such infrastructure (particularly new health facilities and schools) will be required, supported by an Infrastructure Delivery Plan.

Regulation 19 responses

- 3.14 There were 70 respondents including statutory consultees, adjacent boroughs, developers, landowners, residents associations, neighbourhood forums and individuals. Many respondents provided extensive and detailed representations on all aspects of the plan. The number of responses is consistent with this stage of the Plan adoption process, bearing in mind earlier phases of consultation have taken place and this is a more technical "soundness" stage of consultation.
- 3.15 A full schedule, summarising representations received, officers' responses and recommended remedies to objections including amendments to the draft Brent Local Plan are set out in Appendix 3.
- 3.16 This report presents the most significant issues raised and those that potentially pose the greatest risk to the Plan. It also considers how best that risk would be mitigated in order to get the Planning Inspector support this as a sound plan. When submitting the Local Plan for examination the Council can request the Inspector incorporates modifications that it proposes to the draft Plan. These might be necessary for the Inspector to be able to consider the Plan sound and capable of adoption. There are outstanding objections to the Plan on the basis of its soundness. There will be a continuation of dialogue with objectors to wherever possible remove objections or issues raised about the soundness of the Plan, if necessary through proposed modifications. This will be prior to and during any formal hearings as part of the examination process after the Plan's submission. This is standard practice when a plan is being examined.
- 3.17 The Council will need to be able to propose further proposed modifications in a timely manner to expedite the examination process. Cabinet and Full Council meetings are relatively infrequent and this could adversely affect the speed of the examination process if Full Council was required to consider further proposed modifications. As such the report recommends that Full Council delegate authority to the Strategic Director Regeneration and Environment in association with the Cabinet Member for Regeneration, Property and Planning to make proposed modifications to the Brent Local Plan throughout the examination process to ensure that it can be found 'sound' by the Planning Inspector.

Summary of responses received

General

- 3.18 The feedback from the public has generally been consistent to that of the early stages outlined in paragraph 3.4. The recognition of the need for new homes is recognised and affordable ones in particular regarded as necessary, but there are associated concerns over population growth, pressure on social infrastructure and likely changes in the borough's character.

- 3.19 Developers have been generally supportive of growth, but there are concerns over the specifics of site allocations, such as indicative dwelling numbers, range of uses allowed and heights of buildings allowed. The same is true of matters such as affordable housing tenure requirements, larger sites needing to accommodate build to rent homes and older peoples' housing and viability of the policies when considered as a whole, sites requiring masterplanning prior to the Council wanting to be in a position to consider associated planning applications.

London Mayor/Greater London Authority

- 3.20 It is a statutory requirement for Brent's Local Plan to be prepared to be in 'general conformity' with the Mayor's adopted London Plan. As such, representations submitted by the Greater London Authority (GLA) who represent the Mayor are significant for the Planning Inspectorate.
- 3.21 Throughout the draft Brent Local Plan's stages the draft new London Plan has also been progressing through its adoption process. It is likely that the new London Plan will be adopted by the time Brent's Local Plan is examined. The draft Local Plan has been written also taking account of the contents of the emerging London Plan, recognising that the adopted London Plan will be superseded.
- 3.22 In December the Mayor issued his Intention to Publish London Plan (the Plan the Mayor wants to adopt) to the Secretary of State. It now rests with the Secretary of State to determine whether to intervene in the plan. Any changes directed would need to be considered by the Council in the run up to the examination.

Significant responses received to the draft Brent Local Plan

GLA Industrial Land

- 3.23 The GLA has raised a non-conformity issue in the context of the draft London Plan's identification of Brent as a 'provide capacity' borough for industrial land. The GLA references its industrial land study that identifies Brent needs to provide the equivalent of an additional 43 hectares of industrial land (that is land solely for light industry, general industry and storage and distribution), plus what will be lost at Northfields as a result of the Berkley Homes development (about 7 hectares). Their position is not new, as it is consistent with that set out at the Brent Draft Local Plan preferred options stage. The 'provide capacity' designation related to the amount of uplift sought is one of the matters that the Council (supported by Ealing and Enfield, also provide capacity boroughs) attended the London Plan Examination Hearings sessions as an objector.
- 3.24 The GLA consider that the borough should be more pro-active in actively showing how the 43(+) hectares can be delivered. They set out that the borough should undertake a study to identify for each individual plot on designated industrial estates how intensification can occur. They also have specific objection to the identification of Neasden and Staples Corner Growth Areas as these promote mixed-use development on Strategic Industrial Land. They are also requiring long standing Brent Local Plan 2011 residential led site allocations being taken forward in the draft Local Plan to, as a minimum, re-provide all the existing industrial floorspace. They object to the Council's

methodology for identifying how much additional industrial floorspace is required in the borough (work commissioned with West London Alliance boroughs).

- 3.25 Subsequent to the representation positive dialogue with GLA and OPDC officers on industrial matters has occurred. Appendix 3 recommends some modifications to the Plan to provide more clarity on industrial land matters. This will create a more obvious alignment between the Local Plan and the London Plan, where potential for confusion might exist now. On Staples Corner, the Council is working with the GLA and Barnet on some preliminary testing of the potential for intensification of industrial land that tests the potential to release parts of the area for residential and other uses that would support a mixed-use community.
- 3.26 There are still differences however between the GLA and the Council on the ability to deliver the quantum of uplift identified in the London Plan evidence base. This is essentially down to viability, but also other factors such as fragmented land ownership, with the Council's evidence base indicating that a step change in developer delivery to the extent required is unlikely to materialise. As such whilst it is considered that the Council's policies provide a positive context for a net increase, they cannot guarantee its delivery.
- 3.27 Although a borough Local Plan should be in general conformity, it is not a requirement for it to be in conformity on all matters. The examination Inspector can consider that local circumstances evidence is sufficiently compelling that a departure is justified on certain matters, but in the round the Local Plan is still in general conformity with the London Plan.

GLA Housing

- 3.28 A real positive has been the London Plan Panel's recommendations on borough housing numbers, which the Mayor has accepted. The panel supported the Council's (and many other outer London borough's position) that the December 2017 draft London Plan target which relied heavily on small sites was unrealistic. This has resulted in Brent's housing target dropping from 29,150 to 23,250 dwellings in the period 2019/20-2028/29. This is still a significant target and the ability to deliver this amount should not be underestimated; to achieve it there will still need to be development on small sites. Nevertheless, this is below the deliverable target identified in the current draft of the Local Plan. It has removed a previously held GLA general conformity issue.
- 3.29 As the London Plan target has reduced, it is considered that there is merit in the Council reducing its minimum delivery target in those 10 years to that of the London Plan. This is set out in the recommendations in Appendix 3. This is likely to give greater ability to achieve the Government's Housing Delivery and 5-Year Deliverable Housing Sites tests. The Council is awaiting the findings of the first 5-year deliverable housing sites annual position statements submitted to the Planning Inspectorate. This will clarify how stringent the evidence required to show that a site is considered deliverable. The Local Plan Inspector is likely to pay close attention to how achievable the housing target is. It is considered that the Council has sufficient evidence to show delivery of the 23,250 10-year target as it will have approximately a 10% buffer identified in its housing delivery trajectory, that provides flexibility should sites for whatever reason not come forward as anticipated. The sites have been identified; the

key issue will be developer appetite to deliver within the timescales that in many cases they have agreed.

Gypsies and Travellers

- 3.30 Although not raised as a general conformity issue in the Mayor's letter, addressing Gypsy and Traveller needs remains unresolved. The Mayor has rejected the London Plan examination panel's recommendations on the need for the London Plan to amend its definition of a Gypsy and Traveller to that of national planning policy. The Secretary of State has raised this as an issue previously in response to early drafts of the London Plan. There is therefore a strong possibility that the Secretary of State might intervene on this matter and direct that the London Plan be amended. The different definitions create very different levels of need for the Brent Local Plan to address. This is zero additional plots with the national definition, or 90 additional plots with the Mayor's definition.
- 3.31 A precautionary approach on this matter has been taken to secure progress on the Plan. Whilst not allocating any specific sites, policy BH9 provides very broad locations i.e. Growth Areas (with the exception of South Kilburn) where the provision will be considered and a criteria based policy which sets out matters that sites will have to address. This does not imply acceptance of any sites but is rather a pragmatic approach to comply with national policy, meet environmental and equality requirements and allow for an objective assessment of need/supply issues. This approach will help to minimise the risk of challenge since a) the absence of a policy would render the plan unsound; and b) a restrictive policy would be inconsistent with national policy and likewise would be unsound.

Environment Agency – Flood risk

- 3.32 The Environment Agency has raised an issue with how sites that are within floodplain (Flood Zone 3 or 1% annual probability of flooding) have been identified for development. In accordance with national policy, the Council is required to identify development land sequentially, ideally meeting all needs in areas at very low risk of flooding, then those areas with slightly more risk, before considering floodplain. It evidences this through a 'sequential test' and exceptions test if certain uses are proposed within floodplain.
- 3.33 The Council's evidence has been clear that the London Plan housing target cannot be met on identified sites outside the floodplain. Consequently, it has no option left but to consider within the floodplain development that does not unacceptably increase flood risk to occupants or elsewhere. The majority of these sites are not new sites, essentially being long-term allocations adjacent to the Wealdstone Brook through Wembley and Wembley Point/ Bridge Park. Further dialogue has occurred with the Agency with a view to resolving this issue. Some additional flood risk evidence may need commissioning, although information from site owners may mean this unnecessary.

Highways England – M1 Impacts

- 3.34 The representation requests some form of traffic modelling to understand growth impacts on the M1 in particular. At a strategic London wide level the Mayor's evidence base indicates that whilst the number of journeys will increase

with the rises in population predicted, private vehicle use in particular will reduce significantly. Consistent with the emphasis on reducing the need to travel by car, much of Brent's future development will be car free. Contact has been made with Highways England to identify whether in this context the work is necessary and if so what its scope should be. Any such work is likely to involve Transport for London strategic road network team and the London Borough of Barnet.

Self-build and custom build

- 3.35 The Council has a statutory duty to plan for self-build and custom build by ensuring sufficient identifiable sites are available. The Brent self-build register administered by the Council has had limited interest. It is considered that sufficient sites are coming forward through small site planning permissions for self-builders for the Council to discharge this duty. The Council identifies a list of housing sites of up to 5 dwellings on its website, whilst the brownfield register identifies those of more than 5 dwellings. In the context of other competing uses for land, site allocations specifically within the Plan are not proposed.

Social Infrastructure

- 3.36 There have been representations from organisations related to social infrastructure such as the Department for Education and Brent Clinical Commissioning Group (CCG). The Plan has sought to best identify the necessary infrastructure that it is aware of the need to provide by liaising with relevant parties, such as the CCG and Brent staff responsible for schools place planning. Where certainty on requirements has been possible, it has identified specific sites, such as new schools at Chancel House, York House, South Kilburn and at Oriental City. For new Growth Areas the Plan identifies the need for masterplanning, which will need to plan for social infrastructure required to support new communities, this will require engagement with infrastructure providers.
- 3.37 An Infrastructure Delivery Plan (IDP) supports the Local Plan. It sets out short, medium and longer-term infrastructure projects required to address growth needs. The IDP will be used to support the allocation of CIL and S106 funding. The IDP will be reviewed on a regular basis and treated as a 'live' document. It will be updated, as new information and evidence become available (i.e. annual school place planning projections).

Adjoining boroughs

- 3.38 The Council has a duty to co-operate, although not necessarily agree with adjoining boroughs on strategic planning matters. Matters related to cross-border issues will be set out in a series of statements of common ground, setting out where the boroughs agree or disagree. No significant issues have been raised to date which could cause concerns for the adoption process. Work is on-going to see to agree final statements for the examination process.

Neighbourhood Forums

- 3.39 For this round of consultation, only Sudbury Town Residents' Association (STRA) has responded. They state of 319 residents they surveyed, 100% supported the Sudbury Town Neighbourhood Plan compared to the 0% for the

draft Brent Local Plan. They object to the scale of development in Sudbury in the town centre and intensification corridors, where the draft Local Plan identifies five storeys or greater height at strategic points in town centres may be appropriate. They identify the neighbourhood plan seeks to retain the two storey character of the area. They object to Vale Farm being identified for a regional sports centre as this does not spell out policy VF1 of the Sudbury Neighbourhood Plan “Improvements to Vale Farm should not result in the loss of green or open space.” They consider that the Council has ignored the petition signed by 517 people concerning the same issues.

- 3.40 The Sudbury Neighbourhood Plan has no policies on height, but does “suggest that proposals for any new development be in the order of 2-3 storeys high” (page 46). Policy VF1 states: “The Plan supports development that results in the strengthening of Vale Farm as a regional centre for sports excellence.” As such it is considered that there are no direct contradictions with the Neighbourhood Plan’s policies.

Moving forward

- 3.41 Whilst there are some risks as identified above, these are considered manageable. They are an inevitable part of the process of submitting as not all objections will be resolved, which is why examination hearings often occur. Wherever possible, the aim will be to try to reach common ground on issues prior to the examination. This also helps the Inspector decide on which matters he/she needs to consider in more detail during the examination hearings.
- 3.42 Analysis of the plan in terms of its acceptability for submission against Planning Advisory Service checklist have been undertaken. Taking account of this, it is considered that the draft Plan, with the schedule of modifications as set out in Appendix 4 (which incorporates modifications made in response to representations as set out in Appendix 3, plus other mostly minor modifications considered appropriate but not all as a result of representations), is a ‘sound’ document capable of submission and ultimately adoption. It is also considered that the necessary legal processes have been gone through consistent with regulations for it to pass the associated tests.
- 3.43 The proposed modifications in Appendix 4 are not so significant that they substantively change the content/likely outcomes of the Plan away from its vision and strategic objectives, and as such at this stage, it is not considered that they warrant separate consultation prior to their submission with the draft Plan. As the Examination process is likely to result in additional proposed modifications, although it will ultimately be the decision of the Inspector, from an administrative perspective, to save time and to avoid confusion, there is merit in all proposed modifications being consulted upon once, post the end of the hearings.

Submission of the draft Local Plan

- 3.44 The process including the documents to be submitted is set out in Regulation 22 of The Town and Country Planning (Local Planning) (England) Regulations 2012. Along with the draft Local Plan which is Appendix 1 of this report the Council will have to submit:

- a) The Sustainability Appraisal Report. For the purposes of supporting the policies in the draft Local Plan this is Appendix 5 of this report: Brent Local Plan Integrated Impact Assessment. This incorporates the Sustainability Appraisal Report, Strategic Environmental Assessment, Health Impact Assessment, Equalities Assessment and Habitats Regulations Assessment. The Plan's policies and reasonable alternatives have been tested against a number of sustainability objectives to inform the final policy's contents.
- b) A Submission Policies Map, which is Appendix 2 of this report.
- c) A consultation statement, identifying who was consulted at Regulation 18 stage and how they were encouraged to make representations and a summary of the main issues raised in representations. It must also include the number of representations made in response to Regulation 19 and the main issues that were raised. This will be submitted incorporating documents referenced in paragraph 3.2 of this report, plus a summary of Appendix 3 of this report.
- d) Copies of the representations received in response to Regulation 19 consultation.
- e) Supporting documents as in the opinion of the Council are relevant to the preparation of the Local Plan. This will essentially be the evidence base that has been used to inform and support policies in the Plan, likely to be supplemented with topic papers to support the Council's position. The evidence base can be seen on the [Shape Brent webpage](#).

Next stages

3.45 Submission and Examination:

- a) Submission: March 2020. Local Plan Programme Officer starts to act as a key conduit between the inspector and the Council and liaises with the representors on behalf of the inspector.
- b) Inspector's initial questions & matters: anticipate April/May (depends on Inspector and when appointed but normally about 4-6 weeks after submission) At this stage, the Inspector will ask the council a series of questions and matters based on issues he/she considers need further exploration. The council will respond in the form of hearing statements, which may be discussed further at the hearing sessions. Those who made representations to the publication version of the Plan will also have the opportunity to respond to these questions. All statements will be published on the council's website (a dedicated examination webpage, to be updated throughout the process)
- c) Examination and Hearings: anticipate June/July (normally allow up to 3 months from submission to examination)

- 3.46 Inspector's Report and Adoption: on receipt of a positive Inspector's report, the Council will have two choices. It can either adopt the Plan, subject to any proposed modifications if recommended by the Inspector, or alternatively it can choose not to adopt the Plan. As a policy document, its adoption will be a Full Council decision. At this stage it is difficult to provide a definitive timescale for adoption but it is anticipated to take place in late 2020.

Conclusion

- 3.47 Taking account of the above, it is recommended that Full Council approves the submission of the draft Brent Local Plan and necessary associated documents consistent with regulation 22 of the The Town and Country Planning (Local Planning) (England) Regulations 2012.

4.0 Financial Implications

- 4.1 The most significant expense associated with the adoption of the Plan will be the examination process. A fee will be payable to the Planning Inspectorate, the size of which is dependent on the examination's duration. Some additional work on the evidence base between now and the examination and possibly during it, such as viability testing or a consultant's attendance at the examination may be required. There is a remote possibility of external legal advice from Counsel being required. A small amount of funds will be required for publicity and engagement for publication, examination and adoption.
- 4.2 The potential costs associated with the next stages of the adoption of the Local Plan are anticipated to be within the existing Local Plan budget provision.

5.0 Legal Implications

- 5.1 Planning documents (both statutory and non-statutory) have a clearly defined process for their adoption and revocation which will be followed. The Local Plan must be prepared in accordance with the Planning and compulsory purchase Act 2004 and Town and Country Planning (Local Planning) (England) Regulations 2012. The Council is satisfied that all legal requirements have been met.
- 5.2 It is considered that the draft Brent Local Plan appended to this report meets the 'soundness' tests as set out in Paragraph 35 of the National Planning Policy Framework.
- 5.3 Advice has been received from the legal department on how to best address efficiency of working when considering the provisions of the Council's constitution.

6.0 Equality Implications

- 6.1 The Equality Act 2010 introduced a new public sector equality duty under section 149. It covers the following nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. The Council must, in exercising its functions, have "due regard" to the need to:

1. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
 2. Advance equality of opportunity between people who share a protected characteristic and those who do not.
 3. Foster good relations between people who share a protected characteristic and those who do not.
- 6.2 The draft Local Plan has been subject to Equality Impact Assessment, with the input of the Council's equalities officer, along with Health Impact Assessment and Strategic Environmental Assessment. This is set out in the Integrated Impact Assessment. This has informed the policies, including analysis of potential alternatives, to seek to reduce adverse impacts and wherever possible improve the outcomes for those with protected characteristics and the social, economic and environmental outcomes of the Plan.

7.0 Consultation with Ward Members and Stakeholders

- 7.1 Consultation has been extensive and on-going throughout the stages of adoption. It has included leaflets delivered to every home in the borough. Public workshops in each Brent connects area at issues and options stage. Additional workshops at preferred options stage. Workshops with specific groups, e.g. developers/landowners, housing associations, youth parliament, disability groups, mothers, faith groups, utilities and meetings with adjacent London Boroughs/Old Oak Development Corporation/GLA. Drop in/information sessions in all local libraries and other locations relevant to local communities, e.g. temples.
- 7.2 Ward members have been engaged through the Local Plan Members' Liaison Group which has met regularly. All members have been invited to numerous workshops at issues and options stage and preferred options stage. The Resources and Public Realm Scrutiny Committee 15th January 2019 considered the Preferred Options consultation version of the draft Local Plan and the results of consultation. Members have been informed of progress of the Plan and events through the members' bulletin. The Cabinet member has routinely sent e-mails to all members at key stages of the engagement process.
- 7.3 Wider awareness raising has been through press-releases, members' bulletin, an article in the Brent Magazine, announcements on the website, public notices, placing documents in libraries and writing to statutory consultees and people on the council's Local Plan consultation database who might have expressed an interest in being kept informed on the Local Plan.

Report sign off:

AMAR DAVE

Strategic Director of Regeneration
and Environment.

Related Documents

[Updating the Council's Planning Strategy \(The Local Plan\) Brent Cabinet 14th February 2017](#)

[Brent Local Plan Issues and Options February 2018](#)

[Brent Local Plan Consultation Report November 2018](#)
[Brent Local Plan Preferred Options November 2018](#)
[Brent Local Plan Preferred Options Consultation Summary October 2019](#)
[Brent Local Plan Preferred Options Consultation Responses and Officer Comments
October 2019](#)
[Draft London Plan Intend to Publish Version December 2020](#)

Appendix 3

BRENT LOCAL PLAN PUBLICATION STAGE CONSULTATION RESPONSES

February 2020

SUMMARY OF COMMENTS RECEIVED,
RESPONSES AND PROPOSED CHANGES TO
THE DRAFT LOCAL PLAN



CONTENTS

1 Consultation Overview 3

2 introduction 4

3 Brent's Characteristics..... 5

4 Development Vision and Good Growth in Brent 7

5 Places 15

5.1 Central 16

5.2 East..... 30

5.3 North..... 41

5.4 North West 57

5.5 South..... 60

5.6 South East 69

5.7 South West 77

6.1 Design 95

6.2 Housing..... 102

6.3 Social Infrastructure 125

6.4 Economy and Town Centres 128

6.5 Heritage and Culture 145

6.6 Green Infrastructure 149

6.7 Sustainable Infrastructure 154

6.8 Transport 161

7 Delivery and Monitoring 169

8 Appendices 173

Glossary 174

Overall..... 175

Policies Map 178

IIA 179

Tall Building Strategy 181

Infrastructure Delivery Plan..... 182

Historic Environment Placemaking Strategy 183

Formatting explainer: Throughout the document, in the proposed changes column, the proposed Modifications are generally expressed in the form of ~~striketrough~~ for deletions of text and underlined for additions of text.

1 CONSULTATION OVERVIEW					
Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
1 Consultation overview	Blank Consultation Overview	Andrea Diez	Crown pub in Willesden, Willesden police station both empty and would be better utilised for new flats.	The Crown Pub is included in the BSSA5: Willesden Bus Depot allocation, whilst the former police station is identified as BSESA23: Former Willesden Green Police Station. As such their potential for regeneration has been identified. The police station is currently subject to a planning application.	No Change.
1 Consultation overview	Blank Consultation Overview	Thersa	Plan does not address root causes such as environmental neglect which should be addressed on an on-going basis, not through regeneration. Issues include condition of streets, look of the borough, parks, anti-social behaviour, social isolation, and crime. Regeneration projects are expensive, poorly executed and often unfounded, and do not represent value for money. Regeneration should not be so extensive and frequent. Things should not be allowed to get so bad in the first place and issues should be addressed immediately so as not to become the norm.	The sentiment behind the comment is understood. The Council has worked hard to improve the quality of the management of the local environment. The comment however does not recognise the significant financial restrictions on the Council and other public bodies in relation to the impacts of austerity spending cuts, particularly for revenue budgets. In relation to regeneration projects, it is not considered that more recent projects represent poor value for money, they have reflected a need to deal with fundamental problems that cannot be treated with smaller measures. Schemes such as the regeneration of Stonebridge and South Kilburn have and will continue to clearly positively impact on people's lives by creating significant improvements in housing conditions and the general environment which have reduced actual and perceived impacts of crime and anti-social behaviours.	No Change.

Page 597

2 INTRODUCTION

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
2 Introduction	Para 2-4	John Cox	(5) Figure 3 is completely unclear and also needs some colouring. Look what other boroughs do, since it is a standard Local Plan graphic. Paragraph 2.3 claims it shows the hierarchy. It doesn't. In paragraph 2.4, change "has" to "have". (Can't you grammar-check the whole document?) Paragraph 2.5 and elsewhere should quote the Consolidated Version of the Draft New London Plan of July 2019. Shouldn't you mention the London Plan Panel's recommendations, particularly on housing numbers? Are all references of London Plan policies in your Local Plan and Appendices compatible with the July 2019 version? Long lists of London Plan policy numbers within individual cells of tables of the Appendices should be in alphabetical order.	5. Noted. It is anticipated that once the document has been adopted, so too will the London Plan, in the adopted version of the Local Plan, the London Plan and its correct policies will be referenced. It is not necessary to keep updating the reference to the latest document when it is so soon to be adopted.	5. Improve clarity of Figure 3, and improve colour scheme. Paragraph 2.4 amend: " ~~has~~ <u>have</u> ."
2 introduction	Para 2-18	Thersa	Paragraph 2.18 It is 'evidence-based', not evidence base documents which doesn't make sense.	In the context of what follows, this sentence makes sense.	No Change.
2 introduction	Para 2-22	Thersa	Paragraph 2.22 does not mention Fryent Country Park or other areas. All green spaces should be preserved. Why aren't there any Natura 2000 sites left?	Fryent Country Park does not have a recognised european level designation which is what this sentence is addressing. There are no plans to build on existing parks and open spaces which are protected by policies in the Local Plan and London Plan.	No Change.
2 introduction	Blank Introduction	Mary Duffy	Residents consider the proposed high rise developments inappropriate and do not agree that such development will bring benefits. residents in Neasden have not expressed support for tall buildings in the Neasden area, it has only been developers.	The need to accommodate additional homes, employment and associated social infrastructure to meet growing population needs will require a more intensive use of land. The Council has sought to positively plan for parts of the borough to accommodate taller buildings in its Tall Buildings' Strategy. In Neaden's case this reflects the size of opportunity that exists and also its high level of public transport accessibility. This will enable a new character area to be established in this location which will reduce in scale towards its edges where it meets lower rise development. Concentrating tall buildings in defined locations will ensure that the majority of Brent remains low rise in character.	No Change.
2 introduction	Blank Introduction	Andrea Diez	Long vacant buildings in Willesden, Kilburn and Neasden should be redeveloped into residential.	Noted. The Council has sought to identify these wherever possible through its allocations policies.	No Change.

3 BRENT'S CHARACTERISTICS

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
3 Brent's Characteristics	Para 3-12	Innovative Infill	Manage potential for evolution of character of some suburban locations which are not designated heritage assets.' This is a welcome approach, but not wholly underpinned by policy later in the document.	The Council considers that the document seeks to manage the evolution of parts of the borough which are considered most appropriate for significant change, whilst giving greater protection to those that have recognised heritage assets, or are not well located in terms of the public transport accessibility.	No Change.
3 Brent's Characteristics	Para 3-16	Daniel Hulsmann	None of the 'challenges' cited address the noted problems of obesity, poor education and sedentary lifestyles as stated in paragraph 3.16. 3.28) There is no evidence to suggest that 'Improvements are needed for the provision of football pitches and tennis courts.' These are very narrow sports and will not tackle the fact that 57% of Brent residents do not exercise. The existing policy states that a swimming pool was to be built in Kingsbury which never happened. The demand for this has not changed and should therefore remain within the Plan. Brent needs to consider sports facilities that attract a broad uptake if it wants to solve the prevailing issues it faces.	Criterion c) identifies the need to ensure provision of social infrastructure that will help address obesity, poor education and sedentary lifestyles. For the issues identified in paragraph 3.28 evidence is available in the Council's Indoor Sport and Leisure Facilities Needs Assessment and the Council's Strategic Approach to Playing Pitch Provision document which can be referenced. It is recognised that football and tennis is unlikely to address the majority of the exercise needs of the majority of the population who lead sedentary lifestyles, which is why the Plan seeks to ensure that policies that supports building exercise into everyday life through for example encouraging greater amounts of walking for personal transport needs are supported as much as possible. Policy for the North BP3 currently identifies the need for additional pool provision in the north of the borough.	Amend paragraph 3.28 to identify footnote 17 associated with the text "as with the provision of indoor facilities" Footnote 17 is "Brent Council Indoor Sports and Leisure Facilities Needs Assessment November 2018" Amend paragraph 3.28 to identify footnote 18 associated with the text "the provision of outdoor sports facilities" Footnote 18 is "A Strategic Approach to Playing Provision in Brent December 2016"
3 Brent's Characteristics	Para 3-17	Quintain	Object. Not effective in planning for primary school places. Paragraph states that there is no need for additional places in the short to medium term, however, policy BP1 n) states that a new school will be provided on the York House car park. These two statements are inconsistent. In November 2019 a schools place cabinet report stated that this will be required by September 2023. This should be reflected in the Plan.	This is a fair point and the Plan should be amended to reflect the need for the school on the York House site.	Amend paragraph 3.17 below: ".....medium term. <u>However, to support new residential development, current projections indicate a new primary school will be required in Wembley Park by 2023.</u> "
3 Brent's Characteristics	Para 3-19	Sports England	No reference is made to the Council's Indoor Sport and Leisure Facilities Needs Assessment identifying the need for new and replacement sports hall provision. There should also be reference to the borough's shortfall in outdoor sports provision as highlighted within the Council's Strategic Approach to Playing Pitch Provision document. This will help address desired outcomes set out in paragraph 3.19. Shortfalls identified within the Council's evidence base should also be referenced within paragraph 3.19. Under-provision, alongside swimming pool shortfalls may explain the levels of sports participation and physical activity across the borough.	Reference to the Council's Indoor Sport and Leisure Facilities Needs Assessment and Playing Pitches Assessment findings as identified by Sport England is considered appropriate.	Paragraph 3.19 amend: ".....In terms of indoor sports facilities, <u>the Council's Indoor Sports and Leisure Needs Assessment identified</u> provision is significantly below needs. Swimming pools are between ¼-½ of the provision per head of population in adjacent boroughs. <u>There is also the need for additional sports halls. The Council's Playing Pitch assessment identified that for some sports, additional pitches are required.</u> This under provision is partly reflected by the levels of sports participation and physical activity across the borough."

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
3 Brent's Characteristics	Blank Brent's Characteristics	thersa	The Plan acknowledges problems without any account being made as to the Council's responsibility for them. High street decline has resulted in job losses and makes it impossible to acquire goods locally, forcing residents to venture further afield or shop online. This makes things difficult for the elderly and disabled. I can recall having a large offer or multiples in Harlesden which have since disappeared. Unviable shops have been closed due to lack of investment, only to be replaced with shops of lower quality which don't address the needs of the original populations. It seems like an engineered decline. Shops seem to have less regard for their appearance, with too much visual noise, and not enough investment to make them appealing prospects for customers and businesses alike. The poor environment is bad for people's mental health. Why are so many street trees allowed to be cut down given their many benefits?	The Plan provides an overview of changes and challenges to Brent's high streets, identifying the role that higher order centres close by have had and will continue to have on Brent's town centres. Notwithstanding changes that have occurred, Brent still has a significant number of town centres and shops that serve local needs, with the Council through its town centre managers and a variety of functions seeking to maintain or improve the centres. This has included taking enforcement action against properties owners to reduce clutter and improve the appearance of buildings. Whilst many trees have been cut down, this is because either they have reached or are near the end of their life or are causing damage to pavements or property in close proximity which is leading to claims against the Council. The Council is working to remove stumps and replace trees where it can and introduce new trees on streets where there are currently none. This positive work has been recognised in recent awards to the Council.	No Change.
3 Brent's Characteristics	Blank Brent's Characteristics	GLA	Brent's background context is established clearly and concisely and underpins the strategic direction of policies later on in the document. The Mayor welcomes this logical and methodical approach.	Noted.	No Change.

4 DEVELOPMENT VISION AND GOOD GROWTH IN BRENT

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
4 Development Vision and Good Growth in Brent	Vision	Andrea Diez	Willesden, Stonebridge, Kilburn and Neasden require regeneration as buildings remain vacant for too long.	This is recognised in the Plan and where opportunities to regenerate under-used or vacant land exist these have been identified. The complicated nature of these sites which are usually subject to multiple ownerships means that they may in some cases be slower to come forward than desired, however the Council has sought to be realistic in the timescales it has identified for delivery.	No Change.
4 Development Vision and Good Growth in Brent	Vision	Angela Barrett	I don't want more people, Brent is crowded enough. More people = lower standard of living for everyone, more traffic, more waste, more pollution, and the loss of the green spaces we have.	The population of Brent will increase even if additional homes are not built. This has been the case over the last twenty years where population growth has outstripped that which can be explained by additional dwellings alone. This is because larger households who cannot meet their housing needs are effectively occupying properties that are too small for them. Without building new (mostly affordable) homes there is little prospect of these people changing their living conditions for the better. Brent's population profile is such that it will generate a significant number of new residents who will require housing in the future.	No Change.
4 Development Vision and Good Growth in Brent	Vision	Theatres Trust	Support, especially as seeks to provide required cultural assets. These facilities help bring people together and provide opportunity to participate in the arts, contributing to the cultural well-being of residents. They also increase footfall helping to support local businesses. This is required by NPPF paragraph 20.	Support welcomed.	No Change.
4 Development Vision and Good Growth in Brent	Vision	Mary Duffy	Too much weight given to developers. Best improvements are undertaken by residents, including to their own properties, and by community groups and bodies such as the Canal and River Trust, and Natural England.	The Council has to work within the boundaries set by national and London Plan policies. The Council recognises that the best developments are those that grow and are shaped with full and meaningful engagement with the local community. As such it encourages developers to engage early with communities in its statement of community involvement. The better developers, with a long term interest in a site/ area are more likely to undertake this meaningful engagement as it is more likely to pay dividends in the longer term.	No Change.
4 Development Vision and Good Growth in Brent	Vision	Daniel Hulsmann	Vision ignores sustainability and climate change which are essential concerns to be addressed. Growth and sustainability are mutually exclusive and the vision does not propose sustainability.	Growth and sustainability need not be mutually exclusive, but are highly reliant on how resources are used and the way wealth is distributed. There is identification under the headings of increasing efficiency and resilience that addresses matters related to climate change. Through its policies and London Plan policies development within the borough is subject to addressing the impacts of climate change to some of the highest standards in the UK.	No Change.
4 Development Vision and Good Growth in Brent	vision	GLA	The Mayor welcomes that his Good Growth Policies have formed the basis for the Local Plan's vision of the borough over the coming fifteen years and beyond. This approach is welcome and aligns well with the draft new London Plan.	Support welcomed.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
4 Development Vision and Good Growth in Brent	Good Growth in Brent	Stonebridge Real Estate Development	Support principles of good growth and note development should optimise land. Note support for higher density development in Town Centres and areas with good PTAL.	Support welcomed.	No Change.
4 Development Vision and Good Growth in Brent	Good Growth in Brent	Sports England	New and replacement sporting facilities and pitches are identified in the Council’s evidence base work. No reference to shortfalls will not assist in creating a healthy borough. Include a new objective within the creating a healthy borough: “ensure that there is sufficient supply of indoor and outdoor sports provision to meet demand which will assist in increasing the levels of sports participation and physical activity within the Borough”	It is considered that reference to the proposed objective is suitable as it is something that policies within the Plan actively seek to promote.	Add to Creating a Healthy Borough an additional criterion: " <u>e) ensure that there is sufficient supply of indoor and outdoor sports provision to meet demand which will assist in increasing the levels of sports participation and physical activity within the Borough</u> ".
4 Development Vision and Good Growth in Brent	Good Growth in Brent	John Cox	(1) The headings of the sections within 4.37 should be numbered as in Figure 5, because it is impossible to quickly refer to a subsection otherwise. So, for instance, “GROWING A GOOD ECONOMY” would change to “4: GROWING A GOOD ECONOMY”. Its third sub-section would then be referred to as “4.37 4c”. Clumsy, yes, but useable.	1) The point on the numbering of the good growth objectives is accepted.	Good Growth Objectives amend: Number each one consistent with Figure 5

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
4 Development Vision and Good Growth in Brent	Good Growth in Brent	John Cox	(2) Using the invented numbering system above, 4.37 1a says “Reduce spatial inequalities” but you should take note of the Consolidated Changes in the Draft New London Plan. In SD10 2.10.2 and 2.10.3 the word “spatial” has been removed, as a result of discussion at the London Plan Examination in Public. It was argued by groups attending the EiP that spatial inequalities can easily be changed by moving wealthy people into poorer areas – but that doesn’t address inequalities and causes of deprivation. You should therefore take the word out. In order for the vision to be sound, a suggested overall change is to say: “4.37 1a) Reduce inequality, disadvantage and causes of deprivation in Brent, particularly around Wembley, Stonebridge, Harlesden, Neasden and South Kilburn.” The “council housing estates” wording should be removed because it encourages replacement of London's most deprived communities by those who are wealthier. Easily available analysis of “mixed and balanced communities” by Government and LSE (Paul Cheshire) shows no economic benefit to poorer residents and can easily increase day-to-day costs if well-established local shops close down, to service instead the needs of wealthier incomers. When choosing your improved wording for 4.37 1a, you should keep in mind the consolidated changes to 2.10.2 of the Draft New London Plan which state: “In order for regeneration initiatives to contribute to Good Growth it is important that they tackle poverty, disadvantage, inequality and the causes of deprivation, address social, economic and environmental barriers and benefit existing residents and businesses in an area.”	2) Whilst understanding that spatial might have been removed from the London plan in Brent spatial inequalities might not only relate to people but access to services/ facilities/ social infrastructure etc. It is not the Council's intention to 'cleanse' estates or displace deprived people and replace them with those who are not so deprived. Mixed and balanced communities promote better social cohesion and have less adverse indicators than single tenure low income estates in terms of quality of life. London Plan policy on estate renewal in any case essentially puts into place a number of checks and balances that ensure that the existing community is protected in any estate regeneration, including a ballot before regeneration is able to proceed.	No Change.
	Good Growth in Brent	Andrea Diez	Long vacant buildings in Willesden, Kilburn and Neasden should be redeveloped into residential.	This is recognised in the Plan and where opportunities to regenerate under-used or vacant land exist these have been identified. The complicated nature of these sites which are usually subject to multiple ownerships means that they may in some cases be slower to come forward than desired, however the Council has sought to be realistic in the timescales it has identified for delivery.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
4 Development Vision and Good Growth in Brent	Good Growth in Brent	Innovative Infill	Plan deviates from DNLP small sites policy and is not sufficiently justified. Support Plans aspirations, however, this deviation may impede achievement of other policy objectives. In the context of a growing city the DNLP argues it is no longer justifiable or equitable that low density Metroland suburbs remain as they are. It recognises that the character of these areas should be allowed to evolve over time to provide new homes. The Plan as is ignores this shift by subtle but potentially effective means, continuing to inhibit delivery within these areas. Increased growth brings benefits to existing and future residents as increased densities help support more infrastructure. The plan compromises broader questions of fairness in where and how change is accommodated. BH1 states that the majority of delivery is to be focused in designated development areas which represents on a small fraction (~12-15%) of the total land area. This means that the residents within these areas must bear the full burden of development and increased densities, whilst those privileged enough to dwell at a density of 12 houses to the acre are insulated from all change. This section of society is largely dominated by private owner-occupiers whereas the former includes greater proportions of renters and residents of HMO's. The evidence base is deficient as neither the Inclusive Growth Strategy, nor the Equalities Impact Assessment identify or justify this embedded inequity.	The Panel recommended the removal of the small sites presumption in favour policy from the London Plan, recognising that its one size fits all approach was not appropriate for a place as diverse as London. The Council considers that its approach of encouraging the majority of development to occur in areas with good accessibility to public transport is the correct one. The alternative is to increase car dependence with its associated impacts on health, air quality and physical infrastructure requirements. Once the priority areas are delivered, then a focus can move towards the next areas of under-used land where public transport interventions and investments can take place, which is more likely to deliver more sustainable development. In relation to the existing stock at lower densities, many of these homes due to Brent's demographic profile are occupied by extended families.	As the draft London Plan policy H2A has been removed from the Mayor's Intend to Publish version, it is proposed that BH4 is updated to provide the policy for promoting small site development in the borough. This is set out in the responses to representations on BH4.
4 Development Vision and Good Growth in Brent	Good Growth in Brent	Angela Barrett	We shouldn't be encouraging more people to live here, it is already overcrowded.	Noted, Brent's population will increase whether new homes are built or not, as the existing population will have more births than deaths. Building homes will assist in reducing overcrowding of existing residents which is already some of the highest in the UK.	No Change.
4 Development Vision and Good Growth in Brent	Good Growth in Brent	Mary Duffy	Housing is required but should not be provided in the form of high rise flats. Strong communities are needed which cannot be achieved through pandering to developers.	To meet housing needs within the timescales identified and meeting London Plan policy requirements on standards of accommodation tall building developments are necessary.	No Change.
4 Development Vision and Good Growth in Brent	Good Growth in Brent	thersa	Impossible task as too much destruction needs addressing. Brent has wasted millions in recent decades with no lasting benefit providing no confidence in the Plan and therefore cannot justify any more investment. Who will be held accountable if after completion the environment begins to regress again? There is nothing here about accountability.	The majority of development that occurs in the borough will be delivered by private developers. Registered landlords and the Council will play an important part and have in many cases learnt from mistakes of the past related to design or management of development which have undermined their long term sustainability.	No Change.
4 Development Vision and Good Growth in Brent	Good Growth in Brent	Daniel Hulsmann	a) Positively prepared - the document highlights some of the big issues facing the Borough and then ignores these in the Vision (e.g. sustainability)d) Is not Consistent with national/regional policyNational Planning Policy Framework, February 2019, Sections 2, 4, 9, 10, 11, 12, 13, 14, 15 and 16. The vast majority of applicable National Policy appears to have been ignored by Brent's proposed Plan.	The sustainability aspects are identified in the good growth policy headings, such as increasing efficiency and resilience. The Brent Local Plan does not seek to reproduce national policy or London Plan policy (as required by national policy). London Plan policy has some of the highest sustainability standards in the country related to carbon reduction, energy efficiency, urban greening, affordable housing provision, etc.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
4 Development Vision and Good Growth in Brent	Good Growth in Brent	Stonebridge Real Estate Development	It should be made clearer that opportunities for growth can come from an objective of overall regeneration, particularly where there are a number of large scale sites that cumulatively will make a substantial positive impact. Such an area is within Stonebridge Park. The opportunity for increased densities and transformative change in these locations should be recognised. Note support for higher density development in Town Centres and areas with good PTAL. Proposed changes: insert new criterion under 'making the best use of land' emphasising the opportunities and support for regeneration within Growth Areas and Town Centres.	Criteria a) and b) of Making the Best Use of Land plus the Place policies and site allocations give sufficient emphasis to identifying the regeneration opportunities and the intensity of development that will be supported.	No Change.
4 Development Vision and Good Growth in Brent	Good Growth in Brent	Wembley Towers Limited	Support principles of good growth and note development should optimise land. Note support for higher density development in Town Centres and areas with good PTAL.	Support welcomed.	No Change.
4 Development Vision and Good Growth in Brent	Good Growth in Brent	Wembley Towers Limited	It should be made clearer that opportunities for growth from an objective of overall regeneration, particularly where there are a number of large scale sites that cumulatively will make a substantial positive impact. Such an area is within Stonebridge Park. The opportunity for increased densities and transformative change in these locations should be recognised. Note support for higher density development in Town Centres and areas with good PTAL. It should be made clearer that opportunities for growth from an objective of overall regeneration, particularly where there are a number of large scale sites that cumulatively will make a substantial positive impact. Such an area is within Stonebridge Park. The opportunity for increased densities and transformative change in these locations should be recognised. Proposed changes: insert new criterion under 'making the best use of land' emphasising the opportunities and support for regeneration within Growth Areas and Town Centres.	Criteria a) and b) of Making the Best Use of Land plus the Place policies and site allocations give sufficient emphasis to identifying the regeneration opportunities and the intensity of development that will be supported.	No Change.
4 Development Vision and Good Growth in Brent	Good Growth in Brent	CCG	Welcome reference to health and wellbeing in the good growth policies, and throughout the document.	Support welcomed.	No Change.
4 Development Vision and Good Growth in Brent	Good Growth in Brent	TFL Commercial Development	Support principles of good growth, including desire to prioritise development in Growth Areas such as Neasden, Alperton and Wembley. Strongly support high density development in Town Centres and areas with high PTAL.	Support welcomed.	No change.
4 Development Vision and Good Growth in Brent	DMP1	Stonebridge Real Estate Development	Generally support. Should be modified to 'prioritise locations or areas that are well served by public transport.' This will ensure alignment with NPPF paragraph 123 that states where a land shortage exists, it is especially important to avoid homes being built at low densities, especially in accessible locations, and developments should optimise land. This should be reflected in Plans, including the use of minimum density standards for areas well served by public transport.	The prioritisation of higher density development on sites within areas with higher levels of public transport is a main objective of the plan which seeks to minimise development in areas that do not have good access. Nevertheless, providing that development relates to criteria b) and c) in terms of providing sufficient accessibility that does not cause adverse impact, development is likely to be acceptable. Criterion a) allows the Council to consider whether the appropriate intensity of the site is occurring given its location, i.e. proximity to public transport.	No Change.

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4 Development Vision and Good Growth in Brent	DMP1	Andrea Diez	Long vacant buildings in Willesden, Kilburn and Neasden should be redeveloped into residential.	This is recognised in the Plan and where opportunities to regenerate under-used or vacant land exist these have been identified. The complicated nature of these sites which are usually subject to multiple ownerships means that they may in some cases be slower to come forward than desired, however the Council has sought to be realistic in the timescales it has identified for delivery.	No Change.
4 Development Vision and Good Growth in Brent	DMP1	Theatres Trust	Support part i) as ensures protection of community facilities, placing them as a central pillar of the Plan.	Support welcomed.	No Change.
4 Development Vision and Good Growth in Brent	DMP1	Daniel Hulsmann	Criterion e) only goes so far as 'maintaining' sites of ecological importance and community facilities which fails to create the necessary infrastructure required to support development.	Criterion e) identifies enhancing ecological assets where possible and i) identifies 'where possible enhancing community facilities. Statutory provisions limit the amount of betterment that it is reasonable for the planning system to seek, which has to be fairly related to and proportionate to the impacts of the development proposed.	No Change.
4 Development Vision and Good Growth in Brent	DMP1	Environment Agency	We support this Policy, in particular sections g) and h) referring to reducing flood risk and contamination as well as seeking enhancements to blue infrastructure and waterways.	Noted.	No Change.
4 Development Vision and Good Growth in Brent	DMP1	TfL Commercial Development	Generally support and appreciate acknowledgement that 'developments should provide the appropriate sustainable transport infrastructure' as noted within the Council's Consultation Statement. Part c) should ensure that physical and social infrastructure is located within developments in areas well served by public transport.	This policy is a general overarching one and the level of specification suggested in relation to transport infrastructure is not considered appropriate. Criterion b) deals with impacts on the movement network whilst c) identifies the appropriate physical and social infrastructure, these are considered sufficient levels of detail, when taking account of other policies in the Brent Local Plan and the London Plan that seek to reduce trips by non-sustainable means and provide alternatives that support this.	No Change.
4 Development Vision and Good Growth in Brent	DMP1	TfL Commercial Development	'Necessary infrastructure' should be explicit in referring to both existing and planned infrastructure to ensure delivery is optimised on all suitable sites. These changes will ensure compliance with DNLP policy H1 2a.	Necessary is considered broad enough to cover both existing and future infrastructure needs to address the impacts of a development.	No Change.
4 Development Vision and Good Growth in Brent	DMP1	Wembley Towers Limited	Generally support. Should be modified to 'prioritise locations or areas that are well served by public transport.' This will ensure alignment with NPPF paragraph 123 that states where a land shortage exists, it is especially important to avoid homes being built at low densities, especially in accessible locations, and developments should optimise land. This should be reflected in Plans, including the use of minimum density standards for areas well served by public transport.	The prioritisation of higher density development on sites within areas with higher levels of public transport is a main objective of the plan which seeks to minimise development in areas that do not have good access. Nevertheless, providing that development relates criteria b) and c) in terms of providing sufficient accessibility that does not cause adverse impact, development is likely to be acceptable. Criterion a) allows the Council to consider whether the appropriate intensity of the site is occurring given its location, i.e. proximity to public transport.	No Change.
4 Development Vision and Good Growth in Brent	DMP1	thersa	DMP1:What is meant by 'high amenity trees'? They are all important and where have they gone? Absence of trees creates harsh and depressing environments.	High amenity trees are essentially those which it would be appropriate to protect through a Tree Preservation Order. As the policy seeks to enhance or provide appropriate additions where possible, the aim is to provide more trees where	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
				existing ones cannot be retained.	
4 Development Vision and Good Growth in Brent	DMP1	thersa	Increasing/ improving green spaces should be a top priority as it is the most important issue facing the world. Brent needs to do more to encourage (enforce) people to reduce their carbon footprint as this is not something which education alone will achieve. Rather than meeting the demands of a growing population, try and tackle the population boom. Building more capacity will only increase the circular problem. Population numbers need to be reduced. Encourage people to have fewer children, ditch their cars, holidays, reduce waste, 24hr lifestyles, consumption of tech, and requirements on energy.	The compatibility of continued population growth and a western lifestyle with sustainable development is a much larger issue than planning can address on its own. The Council is seeking to improve the quality of life of those who are the most deprived.	No Change.
4 Development Vision and Good Growth in Brent	DMP1	thersa	Support aims for health but imagine little progress will be made. Sleep is most important, and is something that our 24hr lifestyles conflict with. Brent noise abatement teams only work limited hours on weeknights making it difficult to get the help required. Nothing is done about noise on the street. This requires greater input from education, increasing consideration.	On noise, policies seek to reduce the creation of noise through development and also occupants' exposure to adjacent noise creators.	No Change.
4 Development Vision and Good Growth in Brent	DMP1	thersa	Need to address disrespect shown to public places via anti-social behaviour/crime. Living in these conditions negatively impacts mental health.	On anti-social behaviour in public places the Council has a cleansing programme and takes action to prevent all manner of anti-social behaviour through on the spot fines or prosecution where it is appropriate.	No Change.
4 Development Vision and Good Growth in Brent	DMP1	Mary Duffy	Too much sway is given to developers, who are owned by Asset Managers and offshore funds	The private sector are the largest deliverers of development activity in the borough. The Council writes its policies to be consistent with national planning policy and statutory requirements related to what it is fair and reasonable for developments to be expected to deliver as part of the grant of planning permission.	No Change.
4 Development Vision and Good Growth in Brent	DMP1	thersa	Based on historic efforts, Brent cannot create wide-scale, lasting improvements within the borough. New green space and planting trees, which is relatively low-cost, should be commended. New developments are a waste of money, as those which have already been built are ugly, with poor design, negatively impacting the street scene.	The Council has sought to improve the quality of development and has updated its design guidance in relation to new development in general as well as residential extensions. This recommends for instance limited use of materials that it has been recognised do not appear to weather well, such as some forms of timber cladding and renders.	No Change.
4 Development Vision and Good Growth in Brent	DMP1	Quintain	Point C is not positively prepared to meet needs, nor is it effective or consistent with national policy.	The Council's evidence base indicates that 25% 3 bed homes will meet an evidenced need (much higher), with the percentage deemed to be appropriate taking account of deliverability related to viability and density of developments within the borough.	No Change.
4 Development Vision and Good Growth in Brent	Blank Development Vision and Good Growth in Brent	GLA	A proviso or new policy is required stating that where sites have extant permission, and should new applicants come forward, they will need to consider the new London Plan policies.	The Plan makes suitable reference to the new London Plan policies where relevant, including on employment sites the need to support the borough's designation as a 'provide capacity' borough. The Introduction section will be modified before the Plan is adopted. This can make reference to the need to consider updates to national and London level policy	Within the Introduction section amend to include: <u>"There will be a need to consider updates to national and London level policy and guidance after the Plan is adopted. These might be substantial material considerations that alter the weight that</u>

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
				and guidance after the Plan is adopted, indicating that these might be substantial material considerations that alter the weight that can be applied to policies in the Plan when determining planning applications.	<u>can be applied to policies in the Brent Local Plan when determining planning applications. Reference to these will be made in the respective reports associated with the determination of planning applications"</u>

5 PLACES

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5 Places	Maps	OPDC	Waste sites identified in the West London Waste Plan (WLWP) should be shown on the Place diagrams	Agreed, the policies map should include waste sites. The Place Plans provide a high-level overview and the inclusion of more information is likely to make them too busy for such a function. As noted in responses to other representations, the Place Plans will be amended to make reference to clearer boundaries being available on the policies map.	Polices Map amend: Include waste sites as defined in the West London Waste Plan
5 places	Blank Places	GLA	Welcome the approach of dividing the borough up into 7 places. It aligns with Good Growth Policy GG1, which seeks to build strong and inclusive communities through the setting of policies that respond to local circumstance. Through its place policies, Brent should set out its anticipated spatial distribution of growth. This should include indicative capacities in a summary table for residential, office and industrial uses based on the proposed site allocations. This would help to establish whether Brent is capable of meeting identified need over its plan period. If gaps are identified these can then be considered through alternative strategic approaches.	Noted. The Plan has identified sufficient land to meet London Plan housing targets for the period 2019-2029 as outlined in policy BH1. This housing will be directed toward areas as identified within policy BH2. As stated in figure 39, 60% of this capacity is due to come forward in the Growth Areas. The Growth Area policies, and the associated site allocations include their indicative capacities. It is seen that the vast majority of remaining capacity will come forward in the remaining sites which have been prioritised, including site allocations, intensification corridors, town centres and edge of centre sites. This provides a reasonable approximation of the Place capacity with regards to residential, and it would not be appropriate to set further prescriptions in this regard. Industrial floorspace will be intensified as set out within policy BE2 and in accordance with London Plan policy E7. The specific detailing regarding the quantum of industrial intensification for those areas designated appropriate for co-location within policy BE2 will come forward through a masterplan approach. The remaining sites will be intensified in accordance with London Plan policy E7. This is seen as a sufficient response given the potential for uncertainty around the industrial capacity and delivery on small sites. The Council's own evidence base indicates that office development is unlikely to be viable and as such the target identified by the GLA is not regarded as realistic for delivery.	No Change.
5 Places	Blank Places	John Cox	(9) Every Place has an identical and rather useless full page, merely saying "SITE ALLOCATION POLICIES". Instead, and without losing that wording, you need a new page design that mentions the name of the Place, and also shows the title of each Site Allocation in a simple black-text on white-background list.	9. Noted, amend to improve.	9 Improve clarity and presentation of the Site Allocation Policies page for each Place.

5.1 CENTRAL

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.1 Central	Figure 9	Quintain	Noted that Figure 9 (previously figure 8) has been updated but it is unclear due to low resolution. Figure 9 and Figure 30 show two different locations of Wembley Town Centre.	The boundaries of the town centres are shown on the policies map - adding the town centre boundary to Figure 9 and other place diagrams will be considered if this does not result in the place diagrams becoming too busy.	Amend each High Level Place of the Place Vision figure to include town centre boundaries if this does not reduce the effectiveness of the drawing.
5.1 Central	BP1	John Cox	“5.1 CENTRAL PLACE”, should mention Wembley Stadium station has very low visibility for routine use, hampered by its location under “White Horse Bridge” and a desire by the borough to improve matters.	Policy BP1 - Central does state that proposals should plan positively to deliver the place vision, contributing and where appropriate delivering a number of objectives, including c) the enhancement of the public realm and stadium approach from Wembley Stadium and Wembley Park stations. This objective includes creating stronger links between Wembley Park and Wembley town centres. Objective u) also refers to consolidating the pedestrian / cycle Wembley Park / Wembley Stadium station route. Both of these objectives would help to raise awareness of the station.	No Change.
5.1 Central	BP1	Environment Agency	Support the policy.	Noted.	No Change.
5.1 Central	BP1	TFL Commercial Development	Town centre boundary should be extended westwards to include the existing Wembley Park Station car park as requested in the representation to the Preferred Options Local Plan. Development of this site under BCSA7 will positively contribute to the vitality and viability of the town centre. It is a restricting policy for the site's development potential of residential led mixed-use which will contribute to regeneration of town centre. This change is necessary if the draft Plan is to be considered positively prepared, justified and consistent with Draft London Plan Policies including H1 Increasing Housing Supply, NPPF Chapter 11 and NPPF paragraph 8.	The council still maintains that based on recommendations within the retail and leisure needs study an extension of the town centre to include the Wembley Station Car Park is not considered appropriate. The council agrees that the site provides a prime opportunity for mixed-use, residential-led development, as per the site allocation policy. However the council disagrees that not extending the town centre boundary to include this site would be restricting for the site's development potential. As an edge of town centre site any proposal involving a town centre use would have an elevated status in principle due to its 'edge of centre' location. The Council could consider the merits of any proposal on the basis of its contribution to/ impact on improving the vitality and viability of the town centre. The fact that the site is located within a growth area and the fact that BCSA7 outlines that the southern part of the site might be suitable for up to ten storeys towards the west indicates that being just outside of the town centre boundary is not restricting development on this site. Should the site incorporate main town centre uses as part of its redevelopment the council can consider this through potentially revising town centre boundaries in the future.	No Change.
5.1 Central	BP1	Quintain	Objection maintained. Part N – Quintain supports the reference to providing a primary school but policy assumes that School will be delivered on York House site. There needs to be a caveat should Department of Education not deliver. Suggested change: “Providing a new primary school on the York House car park site by 2023, subject to child yield projections and school capacity requirements being monitored on an annual basis”.	Part N: The current policy wording is considered acceptable in this high level policy. The site allocation policy for York House states that a primary school is required as part of the Wembley Park development once Wembley Park is sufficiently occupied, creating the need for additional school place capacity, and that if the site is not required for the school then alternative suitable provision will be required elsewhere within the Growth Area.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.1 Central	BP1	Quintain	Objection maintained. Part e – policy does not meet the test of soundness as it is not consistent with NPPF. Intensification supported not only around Wembley Park station but also where PTAL levels are 4 or higher or are predicted to be improved. Text change suggested: “Subject to meeting other policy objectives in this plan intensification and higher residential densities will be supported around Wembley Park Station and surrounding areas where PTAL levels are high or there are proposals to improve them, where it can be demonstrated development would take advantage of the area’s good access to public transport.”	Part E: Clearly as shown through the identification of the Tall Buildings Zone and the indicative capacities on sites the Council has not focussed on high density being appropriate around Wembley Park Station. Amending the policy to remove "station" gives an indication of a wider area of intensification.	Criterion e) amend: "Intensification and higher residential densities will be supported around Wembley Park Station where it can be demonstrated development would take advantage of the area’s good access to public transport."
5.1 Central	BP1	Quintain	Objection maintained. Part L – object to increasing supply of modern affordable workplace unless viability is taken into account. Text suggested: “Where viable, increasing the supply of modern affordable workplace developments for the arts and creative industries.”	Part L: All policies take account of viability in the making of the Plan. Ultimately on mixed use developments if the policy requirements affect viability this is reflected in the affordable housing delivered on site. As with any application where the ability to meet the affordable housing policy cannot be met, the Council will need to balance up a number of competing policy requirements, prioritising those over others.	No Change.
5.1 Central	Para 5-1-25	Quintain	Objection maintained. Re-provision or expansion of current retail warehouse use is not deliverable based on the masterplan redevelopment of Stadium Retail Park. Although the word ‘ideally’ has been included, the text does reflect the current planning application (17/3059)	BCSA2 Site allocation takes account of planning application (17/3059) which Planning Committee has now been minded to approve. 5.1.25 recognises that redevelopment of Stadium Retail Park can enhance Wembley's 'Retail offer'. This is in line with the planning application that offers A1-A4 retail. Furthermore, the paragraph states that 'it and other sites in the town centre' provide the opportunity to reprovide and expand the retail floorspace to address the identified needs by the Retail and Leisure Study 2018. It provides for flexibility and takes account of changes in evidence base that have become available to the Council after the fundamental elements of the current application had been agreed in principle.	No Change.
5.1 Central	Para 5-1-26	Quintain	Metropolitan status supported.	Support welcomed.	No Change.
5.1 Central	Para 5-1-33	Quintain	The text should recognise Troubadour theatre and Boxpark as meanwhile leisure uses that will be replaced by permanent uses in due course.	Agreed, these are meanwhile uses and can be reflected in the text.	Paragraph 5.1.33 amend: "...The provision of Boxpark, Troubadour theatre (<u>meanwhile uses</u>) plus the development of Plot W12"
5.1 Central	BCGA1	Environment Agency	Support the policy.	Noted.	No Change.
5.1 Central	BCGA1	GLA	LB Brent should consider making the Wembley Opportunity Area a sub area in its own right. • Growth and development treated differently than other areas in Brent. • Wembley OA to deliver 14,000 new homes and 13,500 new jobs by 2041. • Define OA boundary on policy map. • Sites distinguished differently from site allocation. • Make clear if Wembley GA corresponds to Wembley OA.	The Council considers that for the purposes of this Local Plan the Wembley Growth Area policy is seeking to deliver the London Plan's Wembley Opportunity Area. It is agreed that this needs to be indicated on the policies map and for the relevant site allocation policies to flag up where the site allocation is located within the Wembley Opportunity Area.	Wembley Growth Area/Opportunity Area to be indicated on the policies map.Site allocation policies (BCSA1-19 and BSWA8-12 and BSWA17) planning considerations to be amended: "The site is located within the <u>Wembley Opportunity Area</u> and as such <u>London Plan policies on Opportunity Areas are applicable.</u> "Paragraph 5.1.40 amend: "Wembley Growth Area <u>is the Wembley Opportunity Area, as designated in the London Plan. Its designation as an Opportunity Area means that its growth is of strategic importance to the whole</u>

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
					of London. It covers an extensive element of the
5.1 Central	BCSA1	Historic England	Development will have adverse impact on Barn Hill conservation area. It should be referenced in Design Principles and direct towards relevant Historic England guidance.	Policy BP1 (Central) requires proposals to conserve and enhance heritage and cultural assets, including Barn Hill Conservation Area. As such, development on this site will be required to adhere to this policy. The Council's principal conservation officer will give input at detailed planning application stage regarding the appropriateness of any proposed development in terms of its impact in line with Policy BP1. Additionally, in broad terms, the Tall Buildings Strategy considered potential for adverse impacts on conservation areas in its conclusions on recommending appropriate areas, and the acceptable height of buildings reduces closer to the conservation area. Nevertheless, additional mention of the adjacent conservation area would draw this to the attention of the designers of any proposed development.	BCSA1 Design considerations amend: "...to take account of the setting of the opposite Grade 2 Listed former Town Hall, <u>Barn Hill conservation area</u> and not....."
5.1 Central	BCSA1	Thames water	Wastewater network unable to support capacity. Local upgrades required to existing drainage ahead of development. Developer to liaise with Thames Water for detailed drainage strategy.	Noted. Amend infrastructure section of the policy to make better reference to dialogue with Thames Water.	Infrastructure requirements amend: " ~~Waste water facilities enhancement~~ <u>Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</u> "
5.1 Central	BCSA2	Thames water	Scale of development requires upgrade to wastewater network. Thames Water need to be engaged at the earliest to agree a housing and infrastructure phasing plan.	Noted. Amend infrastructure section of the policy to make better reference to dialogue with Thames Water.	Infrastructure requirements amend: " ~~.....~~ <u>Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</u> "

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.1 Central	BCSA2	Quintain	• Objection maintained to the requirement to ‘replace’ existing retail on the site. The policy does not acknowledge the current planning application for the redevelopment of the site which removes the outdated ‘retail warehouse’ buildings in order to provide a permeable and welcoming pedestrian environment with open space and active frontages, including retail uses. Whilst retail will be provided within the redevelopment, this will be smaller scale and more reflective of modern day retail needs than the current uses. Suggested change: “The existing retail, although is out of town in format and whilst contributing contributes towards retail capacity within a town centre, it does not provide for a welcoming pedestrian environment. As such whilst retail floorspace will be encouraged within redevelopment proposals this should be provided in more appropriate and modern formats given the sites important location within the Wembley Park opportunity area. given the limited opportunities to find new large scale sites to accommodation identified retail needs any development should seek to maximise re-provision of existing floorspace. The opportunity to accommodate convenience retail in particular needs to be considered.”	It is considered that the current policy wording is justified, given that the existing site is located within Wembley Park town centre, and given that national planning policy requires main town centre uses to be located within town centres in accordance with the sequential test. The Brent Retail & Leisure Needs Study also recommends that the Council should retain the core retail functions of its major, district and local centres.	No Change.
5.1 Central Page 613	BCSA2	Quintain	• Object to Fountain Studios (Use Class B1) being referred to as a ‘cultural asset’. There is no justification or market demand for the replacement of the studios which were not protected when they were in active use up. Whilst Quintain have now delivered a theatre within the building this is a temporary meanwhile use which will close in 2025. Additional modern cultural assets are planned elsewhere within the Wembley Park masterplan. Suggested change: “The Fountain Studios is a cultural facility, which in the context of Wembley’s identification in the London Plan as a Cultural Area of strategic importance, Brent’s London Borough of Culture 2020 status and the desire to support the evening economy would ideally be replaced with another cultural facility.”	Noted in relation to Fountain Studios. As the principle of the loss of these premises has been agreed through the planning decision on the current application, this will be removed.	BCSA2 Planning considerations amend: “.... ~~The Fountain Studios is a cultural facility, which in the context of Wembley’s identification in the London Plan as a Cultural Area of strategic importance, Brent’s London Borough of Culture 2020 status and the desire to support the evening economy would ideally be replaced with another cultural facility.....~~ ”

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.1 Central	BCSA3	Thames water	Scale of development requires upgrade to wastewater network. Thames Water need to be engaged at the earliest to agree a housing and infrastructure phasing plan.	Planning considerations takes into account Thames Water comments from previous consultation and has mentioned engagement with Thames Water at the earliest opportunity, as part of the planning application process. Move this to the policy's infrastructure requirements for consistency.	Planning considerations amend: “ ~~Waste water facilities enhancement~~ ~~Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network.~~ ~~Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.”~~ Infrastructure requirements amend: “ <u>Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</u> ”

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.1 Central	BCSA4	Dominvs Group	Object to the inclusion within the 'Planning Considerations' section that 'the council will seek no net loss of employment floorspace and if a plot ratio of 0.65 is greater, encourage the maximisation of its provision suitable for B1 (c), B8 and B2 use as a part of any redevelopment of this site'. Justification required why BCSA4 as a non-designated industrial site is expected to provide no-net loss of employment floor space. Just a blanket requirement of 'no net loss' is not acceptable. This is not evident in Preferred Options version, applied to SIL and LSIS sites only, Policy E7 D 2) states mixed use or residential development on Non-Designated Industrial Site should be supported. Proposed allocation of the site to include Hotel due to its location is GA, OA and CA and policy BP1 and BCGA1.	The Council has responded to the representations received from GLA Policy on this matter. Whilst the Council recognised the 'provide capacity' designation in the draft Local Plan previously, it had not fully understood its implications. As the London Plan was at a draft stage, the Council did not give it significant weight as it had objected to the Plan's contents on this matter. Following the Panel's report it is clear that the 'provide capacity' status is considered appropriate for Brent. The GLA in its representation on the Published Plan identified that the Council should provide an additional 43 hectares of industrial land. On the preferred options for this site it identified: "Proposals for the introduction of residential uses on site would need to apply, as a minimum, an approach of no net loss of industrial floorspace capacity and demonstrate that proposals would not compromise the remaining industrial uses surrounding the site in accordance with Draft New London Plan Policy E7." As such the allocation takes account of their representation. Clearly this site has been subject to a previous allocation of which re-provision of SIL type employment uses as set out in Policy E4 B was not a significant part. The Council understands the site owner's concerns, as it too had envisaged a range of uses as set out in the Wembley Area Action Plan when moving forward the allocation in this Plan. The site is an important component of Brent meeting its housing target in the short term as identified in the trajectory. As such the Council recognises that any proposed development ultimately is likely to reflect a balance between a number of competing aims associated with the type of uses anticipated in its Wembley Area Action Plan allocation and what would be sought in the emerging London Plan related to its existing employment use.	BCSA4 indicative capacity amend: "Up to ~~700~~ <u>500</u> dwellings.....".BCSA4 timeframe for delivery amend: "0-5 years ~~200~~ <u>450</u> 5-10 years ~~500~~ <u>50</u> "

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.1 Central	BCSA4	Thames water	Scale of development requires upgrade to wastewater network. Thames Water need to be engaged at the earliest to agree a housing and infrastructure phasing plan. A critical trunk sewer runs through this site which would need to be considered	Add to Planning considerations the fact that a critical trunk sewer runs through the site. Planning considerations takes into account Thames Water comments from previous consultation and has mentioned engagement with Thames Water at the earliest opportunity, as part of the planning application process. Move this to the policy's infrastructure requirements for consistency.	Planning considerations amend: “ <u>A critical trunk sewer runs through this site which would need to be considered.....</u> ” Planning considerations amend: “ ~~Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.~~ ” Infrastructure requirements amend: “ <u>Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</u> ”

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5.1 Central	BCSA5	Thames water	Scale of development requires upgrade to wastewater network. Thames Water need to be engaged at the earliest to agree a housing and infrastructure phasing plan. A critical trunk sewer runs through this site which would need to be considered	Add to Planning considerations the fact that a critical trunk sewer runs through the site. Planning considerations takes into account Thames Water comments from previous consultation and has mentioned engagement with Thames Water at the earliest opportunity, as part of the planning application process. Move this to the policy's infrastructure requirements for consistency.	Planning considerations amend: “ <u>A critical trunk sewer runs through this site which would need to be considered.....</u> ” Planning considerations amend: “ ~~Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.~~ ” Infrastructure requirements amend: “ <u>Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</u> ”
5.1 Central	BCSA5	GLA	The site is within Wembley OA and town centre boundary. Under office guidelines in Table A1.1 of London Plan, allocation should reflect office-led mixed-use development.	Noted, the site is allocated for main town centre uses, which includes office development. The site already benefits from planning permission for mixed use development consisting of residential and flexible retail uses (A1, A2, A3, D1, D2) and will be developed for this if not required for the relocation of the College of North West London.	BCSA5 Planning Considerations amend: ...potential CNWL/further/higher education campus. <u>Its town centre location also makes it suitable for office-led mixed-use development.</u> ”
5.1 Central	BCSA6	Thames water	Scale of development requires upgrade to wastewater network. Thames Water need to be engaged at the earliest to agree a housing and infrastructure phasing plan.	Planning considerations takes into account Thames Water comments from previous consultation and has mentioned engagement with Thames Water at the earliest opportunity, as part of the planning application process. Move this to the policy's infrastructure requirements for consistency.	Planning considerations amend: “ ~~Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.~~ ” Infrastructure requirements amend: “ <u>Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure</u>

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					<u>essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</u> "
5.1 Central	BCSA6	GLA	Should there be a new planning application, allocation should adhere to London Plan Policy E4, E7 and E1. Proposal for new office space should be directed to town centres.	To provide clarity/ consistency with the London Plan, references in this policy on proposed uses will be amended from employment to industrial.	BCSA6 Indicative Capacity amend: "...plus ~~employment~~ <u>industrial</u> floorspace at ground floor." BCSA6 Planning Considerations amend: "....loss of existing ~~employment~~ <u>industrial</u> land was considered appropriate in the WAAP, Brent's London Plan 'provide capacity' status for ~~employment~~ <u>industrial</u> means that ~~employment~~ <u>industrial</u> floorspace at least on the ground floor of 0.65 plot ratio...."
5.1 Central	BCSA6	Quintain	Objection maintained. The adjacent site to the east (BCSA4) is a redevelopment for residential use and therefore no justification for eastern part of this site allocation to adopt the agent of change principle. This may only effect the north-eastern part of the site which is adjacent to industrial use. suggested change: Development in proximity to the north-eastern part must may need to adopt the 'agent of change'...	Accepted that the adjacent site allocation is principally residential and as such only the north east is likely to remain purely industrial. It is still considered that the policy should refer to the agent of change principle that must be followed in line with the London Plan.	Planning considerations amend: "Development in proximity to the <u>north-eastern</u> part of the site (<u>adjacent to Wembley Business Park</u>) must adopt the 'agent of change..."
5.1 Central	BCSA7	Barratt London and TFL	Design Principles: Generally, those for the south site are appropriate for its context, opportunities and constraints.	General support for design principles of the site allocation is noted.	No Change.
5.1 Central	BCSA7	Barratt London and TFL	Paragraph 2 does not yet fully reflect its tall buildings potential and suitability associated with its Wembley Park Station proximity, associated high PTAL, and surrounding tall buildings. Matthews Close at 10 storeys equivalent does not allow the South site to 'step up' in height towards the Tall Building Zone "Core". Brook Avenue's consistent building height directly conflicts with Policy BD2. Whilst supportive of the text acknowledging potential for tall buildings, removal of "up to" and "slightly directly adjacent" optimises site potential, reflecting the adjacent southern tall building cluster.	The council considers that the Tall Building Strategy and Tall Building Zones provide sufficient scope for upward development. The London Plan supports the identification of areas appropriate for tall buildings, such as clusters. The development of significantly tall buildings outside of these areas will undermine the Council's strategy in consolidating them, whilst retaining the general low-rise character elsewhere. Sites which are appropriate for greater development have been identified as site allocations, are within growth areas, or are within Tall Building Zones. Given the shape and surroundings of the southern part of the site, the council considers that a height of up to ten storeys at the west of the site and a potential stepping up slightly directly adjacent to the station allows for a sufficient stepping up towards the core of the tall building zone. There may be some flexibility adjacent to the station depending on impacts on views and the Barn Hill conservation area from any design.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.1 Central	BCSA7	Barratt London and TFL	Allocated Use: Support “mixed-use residential-led development”. The requirement to replace the existing office floorspace is unnecessarily prescriptive. This space is ancillary to London Underground train crew accommodation. It is not a standardised B1a office use. Recommend the removal of “to include replacement of the existing office space”.	Accepted. The policy was seeking to be supportive of the replacement of the existing TfL supportive uses, rather than anticipating a provision of general office.	Policy BCSA7 allocated use amend: "Mixed-use residential-led development to include replacement of the existing office space <u>TfL ancillary accommodation</u> "
5.1 Central	BCSA7	Thames water	Scale of development requires upgrade to wastewater network. Thames Water need to be engaged at the earliest to agree a housing and infrastructure phasing plan.	Planning considerations takes into account Thames Water comments from previous consultation and has mentioned engagement with Thames Water at the earliest opportunity. Move this to the policy's infrastructure requirements for consistency.	Planning considerations amend: “ ~~Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.~~ ” Infrastructure requirements amend: “ <u>Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</u> ”
5.1 Central	BCSA7	TFL Commercial Development	Allocation is supported. However: Disagree with addition to allocated use having ‘to include replacement of the existing office space’. This was not included in the Preferred options stage and is unnecessarily prescriptive.	Accepted. The policy was seeking to be supportive of the replacement of the existing TfL supportive uses, rather than anticipating a provision of general office.	No Change.
5.1 Central	BCSA7	TFL Commercial Development	Allocation is supported. However: Request that both parts of the site are given separate site allocations as they may come forward separately. Rename southern as: Wembley Park Station car park and northern: Wembley Park Sidings.	It is not considered necessary to split the two sites as separate allocations. The policy provides sufficient clarity on both and removes potential duplication of matters within separate allocation policies.	No Change.
5.1 Central	BCSA7	TFL Commercial Development	Allocation is supported. However: Southern: indicative capacity change to circa 450 homes and timeframe of it changed to within 5 years.	Prior to the consideration of an application, on the basis of pre-application discussions the Council considers some rise in capacity appropriate, but not to the 450 as it does have some concerns over heights. As indicated in the Local Plan, indicative capacity is not intended to either be a cap where a development is all other respects is policy compliant. The Council will bring its delivery of south site forward to the first 5 years given that TfL and Barratt appear to be moving towards early submission of a planning application.	Policy BCSA7 Time Frame for Delivery Amend: 0-5 Years " ~~150~~ <u>375</u> " 5-10 years " ~~250~~ <u>100</u> "

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.1 Central	BCSA7	TFL Commercial Development	Allocation is supported. However: Opportunity for taller building especially on eastern part supported by massing strategy of increasing scale towards the station and Wembley masterplan (east) and the sympathetic stepping down of height towards the street (south). It will serve as a way-finder building as it is adjacent to transport hub, edge of town centre and surrounded by taller buildings in close proximity (premier Inn - 11 storey). The design principles fail to reflect the development aspirations of the borough, the GLA and TfL CD for the site. Therefore: remove 'slightly' and 'directly' from design principles.	Taking account of the Tall Buildings Strategy, given the shape and surroundings of the southern part of the site, the council considers that a height of up to ten storeys at the west of the site and a potential stepping up slightly directly adjacent to the station allows for a sufficient stepping up towards the core of the tall building zone. There may be some flexibility adjacent to the station depending on impacts on views and the Barn Hill conservation area from any design.	No Change.
5.1 Central	BCSA7	TFL Commercial Development	Allocation is supported. However: Ground floor activity may be residential (with front doors) therefore clarity required on 'Active frontage' along Brook Avenue to explicitly acknowledge the likelihood of use to be residential. For this reason, request to include in Wembley Park Town centre boundary.	The council does not consider it necessary to specify the type of active frontage on Brook Avenue at this time. Active frontage does not preclude residential where there is likelihood of interaction with the street.	No Change.
5.1 Central	BCSA7	TfL Commercial Development	• Wording of height to be more flexible to ensure optimization of site and reflect wider context. Consultation statement Policy is very restrictive. • Indicative capacity should be significantly increase from 100 dwellings which is equivalent to 142 dwellings per hectare. • Site requires significant infrastructure works. For development to be viable, a higher capacity is required.	It is agreed that the development on the other side of the sidings is 8 storeys, which provides the backdrop to the site when viewed from the north. The Tall Buildings Strategy seeks a stepping down of tall buildings towards areas of lower rise character. Forty Avenue is seen as an intensification corridor where up to 5 storeys is likely to be appropriate. On reflection, there may be some potential for the development to mediate between the taller buildings south of the railway and Forty Avenue and go taller than 5 storeys. There are sensitive receptors in close proximity to the site such as adjacent nursing home and the school, so the design would need to take account of these when producing a suitable height/ massing. This would be considered at detailed application stage. As such the indicative capacity is considered appropriate in advance of a detailed design bearing in mind that the site is also currently SINC and will need effective mitigation to off-set biodiversity impacts on site.	Policy BCSA7 Design Principles amend: " ~~Buildings may step up to four or five storeys~~ heights should mediate between the taller buildings on Matthews Close and the character of development along Forty Avenue and further to the north, however the northern site is not suitable for tall buildings of a significant scale."
5.1 Central	BCSA8	Thames water	Scale of development requires upgrade to wastewater network. Thames Water need to be engaged at the earliest to agree a housing and infrastructure phasing plan.	Planning considerations takes into account Thames Water comments from previous consultation and has mentioned engagement with Thames Water at the earliest opportunity. Move this to the policy's infrastructure requirements for consistency.	Planning considerations amend: " ~~Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity to meet city requirements.~~ " Infrastructure requirements amend: " <u>H192</u>

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.1 Central	BCSA8	Quintain	Officers comments noted to bring forward the North East Lands. Additional units could be deliverable within the site whilst respecting and enhancing the setting of the new park.	Noted.	No Change.
5.1 Central	BCSA9	Thames water	Scale of development requires upgrade to wastewater network. Thames Water need to be engaged at the earliest to agree a housing and infrastructure phasing plan.	Planning considerations takes into account Thames Water comments from previous consultation and has mentioned engagement with Thames Water at the earliest opportunity. Move this to the policy's infrastructure requirements for consistency.	Planning considerations amend: “ ~~Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.~~ ” Infrastructure requirements amend: “ <u>Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</u> ”
5.1 Central	BCSA9	GLA	• Brent should apply principle of no-net loss of industrial floor space capacity through intensification or co-location in line with London Plan Policy E4 and E7. • Brent should increase industrial floor space capacity on these sites beyond re-provide. Residential use should provide at least 50% affordable. • Residential development in close proximity to industrial use and adjacent to Wembley stadium need to apply ‘agent of change’ principle (London Plan Policy D12)	The sites have previously been removed from SIL and allocated in the WAAP principally for residential use. Whilst some are still in industrial use, they are anticipated to contribute significantly to Brent's housing trajectory. The GLA needs to be realistic about what can be achieved on these sites that have previously been allocated as part of planned wider community and also previously identified housing provision assumed in the SHLAA which informed Brent's housing target but did not sufficiently take account of the 'provide capacity' policy requirement. The current policy approach is considered appropriate balancing the need to recognise the long term allocation of the sites, with the need to address the provide capacity designation of the borough.	BCSA9 Allocated Use amend: "Residential-led mixed-use development, including student accommodation/education and ~~business industrial.~~ " BCSA9 Planning Considerations amend: ~~..~~ "It still contains numerous occupied ~~business industrial~~ premises....." and "...maximum re-provision of ~~business industrial~~ uses....." BCSA9 Design Principles amend: "...Where ~~business industrial~~ premises are being provided on-site, the design should support the amenity of both residential and ~~business industrial~~ uses....." BCSA9 Justification amend: ~~..~~ "..potentially accommodate ~~business industrial~~ premises...."

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.1 Central	BCSA10	Thames water	Scale of development requires upgrade to wastewater network. Thames Water need to be engaged at the earliest to agree a housing and infrastructure phasing plan.	Planning considerations takes into account Thames Water comments from previous consultation and has mentioned engagement with Thames Water at the earliest opportunity. Move this to the policy's infrastructure requirements for consistency.	Planning considerations amend: “ ~~Waste water facilities enhancement~~ Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.” Infrastructure requirements amend: “ <u>Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</u> ”
5.1 Central	BCSA11	Thames water	Scale of development requires upgrade to wastewater network. Thames Water need to be engaged at the earliest to agree a housing and infrastructure phasing plan.	Noted. Amend infrastructure section of the policy to make better reference to dialogue with Thames Water.	Infrastructure requirements amend: “ ~~...Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.~~ ”
5.1 Central	BCSA11	Quintain	Whilst the figure has increased from 100 to 155 dwellings it still does not meet the site's potential. The comparison of the site's potential density to BCSA5 (Olympic Office Centre) is not appropriate for site BCSA11 (CNWL). BCSA11 has the highest PTAL rating of 6a whereas BCSA5 has a PTAL rating of 4/5. the site is a gateway that can maximise densities in accordance to the London Plan, Policy BP1(e) or Policy D6 of Reg18. Suggested amendment to 275 dwellings	The site capacity stated in the Local Plan is indicative only, based on the circumstances of the site and Brent's Tall Building Strategy. A well-designed scheme may be able to provide a higher density than indicated but must adhere to other relevant policies in the Local Plan and the design principles outlined in the policy (including stepping down towards the west of the site, design being sensitive to protected views of the stadium, and active frontages at ground level).	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.1 Central	BCSA12	Thames water	Scale of development requires upgrade to wastewater network. Thames Water need to be engaged at the earliest to agree a housing and infrastructure phasing plan.	Planning considerations takes into account Thames Water comments from previous consultation and has mentioned engagement with Thames Water at the earliest opportunity. Move this to the policy's infrastructure requirements for consistency.	Planning considerations amend: “ ~~Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.~~ ” Infrastructure requirements amend: “ <u>Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</u> ”
5.1 Central	BCSA19	TfL Commercial Development	Site allocation of Wembley Park Bridge Road: • Indicative capacity is too low and suggested change from 60 dwellings to 150-200 units.	The capacity identified would require a tall building outside what is the defined Tall Buildings Zone. At this stage whilst the Council would be comfortable with a mid-rise development within this location, in the absence of a more detailed proposal it is not comfortable with height of building that is likely to be assumed by TfL. The policy justification for BD2 indicates potential flexibility where there is good reason to accommodate taller buildings outside zones. This is the approach that is considered best on this site.	No Change.
5.1 Central	BCSA19	TfL Commercial Development	Site allocation of Wembley Park Bridge Road: • The site allocation currently states that the site is 0.3ha. The accurate area of this site is 0.34 hectares.	Amend site area to 0.34 ha.	BSCSA19 site area amend: "0.34"

5.2 EAST

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.2 East	Para 5-2-14	Quintain	It is noted that the Regulation 19 version now refers to a tall building as 10 storeys or more instead of 12 storeys. No comments have been provided by officers to explain this change.	The preferred options reference in this paragraph was to buildings over 6 storeys. The revision provides greater clarity on the predominant likely scale over which tall buildings will go in the Growth Areas.	No Change.
5.2 East	Para 5-2-16	Quintain	The masterplanning process should include key stakeholders, landowners and developers to help shape the plan from conception to completion, through workshops and consultations. This will ensure the plan is effective and deliverable.	Agreed. The best masterplans are those that seek to engage with a wide variety of people and seek their positive input. This can be highlighted in the paragraph.	Amend Paragraph 5.2.16: "....A masterplanning exercise will be undertaken <u>involving key stakeholders, landowners and developers to help shape the masterplan from conception to completion.</u> This will ~~to~~ identify the appropriate mix of uses and form of development with a view to improving employment opportunities as well as homes.
5.2 East	BP2	TfL Commercial Development	Support Neasden Stations Growth Area and the provision for tall buildings within. Support addition of Neasden Town Centre to BP2 criterion c). Criterion d) limits building heights to no more than 2 storeys above prevailing heights which is unnecessarily restrictive, inhibiting potentially appropriate development considering requirements within DNLP policy D1B. This should be made more flexible, being considered on a case by case basis via a design-led approach.	Criterion d) takes account of the Policy BD2 Tall Buildings which identifies the principal locations for tall buildings, which the London Plan indicates should be Plan led. Criterion d) identifies heights should 'typically' go no higher than 2 storeys above the prevailing predominant heights. This, together with the exceptions in policy BD2 together with its justification should give sufficient flexibility for in justified scenarios for there to be exceptions.	No Change.
5.2 East	BP2	Amafhh Investment Limited	An opportunity has been lost to promote a wider range of uses as part of the transformation of Staples Corner (in addition to “new business premises fit for modern day occupiers in association with a new mixed-use community”) and, more specifically, in recognition of the changing strategic importance of the area and the opportunities provided by the provision of the new railway station.	The Growth Area allocation takes account of the need to address the London Plan's provide capacity borough status for industrial intensification. The need to accommodate the London Plan industrial requirements will in itself generate large floorspace needs. The Council and the GLA are working together to consider the extent to which the mix of uses sought in the policy whilst being London Plan compliant can be delivered. The Growth Area policy is not anticipating any dwellings being delivered in the first 10 years of the Plan. As such there might be scope within a future review of the Local Plan to identify a wider range of opportunities (or indeed fewer opportunities resulting from the intensification of existing SIL designated land.	No Change.
5.2 East	BP2	GLA	Staples corner is Sil and should not be considered for residential unless industrial intensification can enable some SIL release without net loss of industrial capacity, in line with DNLP policy E7. This would need to be established prior to SIL release. As Brent is a Provide Capacity borough it should seek to intensify industrial uses within SIL. Criterion m) requires more clarity so that it is clear intensification applies to B1c, B2, and B8 only (where priority is given to B2 and B8). Part n) should be removed as SIL is not suitable for co-location as identified by DNLP policy E7, unless SIL is released as mentioned above.	The issue of the need to intensify industrial uses on site is understood and is what the Council will seek to achieve. Agreed the policy can be amended to B1c, B2 and B8. There is no specific requirement in the London Plan for priority to be given to B2 and B8. The Council seeks some flexibility on SIL on this site for co-location.	Amend BP2 to: "m) Retaining and encouraging intensification of ~~employment~~ B1c, B2 and B8 industrial uses at Kingsbury Locally Significant Industrial Site.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.2 East	BP2	Quintain	Support revised wording in conjunction with Tall Building Strategy. This now forms a positive and proactive framework to ensure the Neasden Growth Area can deliver identified targets. Precise heights will be derived from further design work and masterplanning.	Support welcomed.	No Change.
5.2 East	BP2	Mary Duffy	Thames Water have indicated that the water network capacity in the Coombe Road site may be unable to support demand from this development, with upgrades likely being required. These sewers already flood into the canal between Braemar Avenue and McDonalds on Coombe Road every time there is heavy rain; and despite calls to both Thames Water and the Canal and River Trust nothing has been done.	The site allocation makes reference to the need to address waste water through development proposals. Operational issues related to sewers are for Thames Water to address.	No Change.
5.2 East	BP2	Aggregate Industries UK Ltd	Aggregates Industrials UK depot at Wembley is long established and meets a vital need for the sustainable important of aggregate, asphalt, and ready mixed concrete into London and should therefore be safeguarded. The NPPF states that existing, planned and potential sites for the bulk transport, handling and processing of minerals, concrete and aggregates should be safeguarded. In addition, NPPF states that planning policies should ensure new development can be integrated with existing facilities, and that they should not have unreasonable restrictions placed on them as a result of development permitted after they were established. DNLP policy Si10 states that development plans should ensure sufficient capacity of aggregate rail depots is available and where practicable expand capacity adjacent to rail depots adjacent to major construction projects. Therefore additional text should be inserted into the policy as follows : (u) Ensure the adjacent existing rail aggregate depot is safeguarded and new development provides “agent of change” mitigation if required.	It is recognised that the aggregates operation provides an important function. The representor has also responded to policy BEGA1 with essentially the same representation. The Council considered that a modification to that policy to take account of the issues raised was appropriate. As such it is not considered necessary to amend policy BP2.	A modification to BEGA1 has been proposed, as such No Change. to BP2 is proposed.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.2 East	BEGA1	GLA	The sites to the west and North are SIL, and the ones to the south LSIS. Such designations should feature on site plans. The approach to industrial land intensification as outlined within DNLP policy E7 should be followed for both SIL and LSIS. Co-location is not considered acceptable on SIL. As Brent is a Provide Capacity it should intensify industrial on SIL.	The industrial designations are on the policies map. The Council has amended the policies map to change the SIL element to LSIS to reflect the potential that the site offers in relation to a significant intensification of use given its proximity to the existing Neasden station and the potential WLO where PTAL will be very high and that therefore justify higher densities/an efficient use of land. The part of the site that was formerly SIL has no functional link to the wider Wembley SIL being split from it by a railway line and has the same characteristics as the LSIS on the opposite side of Neasden Lane. The Council is still planning to intensify the industrial floorspace provided on site to be London Plan compliant.	Amend BEGA1 Allocated Use to: "Growth Area - ~~Strategic Industrial Location and~~ Locally Significant Industrial Sites subject...." Amend BEGA1 Description of Site to: "The site comprises ~~Strategic Industrial Location and~~ Locally Significant Industrial Sites....." Amend BEGA1 Planning Considerations to: "A significant part of the site is ~~Strategic Industrial Land/~~ Locally Significant Industrial Site....." and "0.65 for the current ~~SIL and~~ LSIS sites useable employment floorspace....." Amend BEGA1 Planning Considerations to: "Apart from the railway corridors <u>which are Sites of Importance for Nature Conservation (SINC)</u> , there is very little of ecological value...."
5.2 East	BEGA1	John Cox	The rear of the buildings along the western side of Neasden town centre and those in Birse Crescent are potentially the worst views in Brent, and are seen by everyone travelling east on the North Circular. A coherent, long-term strategy for improving this area needs to be devised which should be driven by development & environmental improvements. This should be reflected in the East Place section. Although land assembly may be an issue, providing a plan for the area should help attract investment, helping increase the social benefits of planning.	The poor character of this area is recognised. These areas were subject to allocations in the 2011 Plan, nevertheless there had been no interest shown in their development, so they have been removed as allocations. One is now identified as part of an intensification corridor, whilst the other sits outside the town centre boundary. The Council is considering options for these sites as part of an overall review of the potential Neasden town centre. As identified land ownerships and viability are likely to be issues in bringing the sites forward, not assisted by proximity to the North Circular, with its environmental challenges. The current lack of allocations is unlikely to significantly affect any potential redevelopment if it proves viable given the supportive framework provided by the Plan to intensification of sites in, or on the edge of town centres and intensification corridors.	No change.
5.2 East	BEGA1	GLA	A large part of the site lies within the Wembley OA which should be clearly defined. Part is also a SINC which should be identified, and DNLP G6 applied.	It is agreed that the Council needs to indicate the Wembley Opportunity Area on the Brent Policies Map. This is considered to be contiguous with the Wembley Growth Area as identified in the Brent Local Plan. It is agreed that part of the site is within a SINC which needs to be recognised in the policy.	Amend text to identify Wembley Opportunity Area is contiguous with the Wembley Growth area boundary.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.2 East	BEGA1	Thames water	Water: the scale of development is likely to require upgrades to the water supply network, and as such the developer and LBB should liaise with Thames Water at the earliest opportunity to agree a phasing plan. Failure to do so will increase the need for planning conditions being sought to control phasing. This should include a housing phasing plan stating what phasing may be necessary to ensure development does not outpace capacity improvement works. Waste: The wastewater network capacity in this area may be unable to support demand, and requiring upgrades to drainage infrastructure. The developer should liaise with Thames Water to determine if a drainage strategy is necessary, stating where, when and how it will be delivered. This should be submitted with the application.	This has been adequately addressed in the infrastructure requirements.	No Change.
5.2 East	BEGA1	TfL Commercial Development	Support inclusion of Neasden Station Car park within growth area. Unlike other sites within BEGA1, this site has no industrial land designations. Therefore the allocation should support this site coming forward for residential development. Brent being a 'Provide Capacity' borough should not preclude such development. Having a clear strategy for industrial intensification should allow such development through co-location with residential. DNLP policy E4 paragraph 6.4.5 states that no net loss does not apply to sites previously used for land for transport functions which are no longer required. The significantly increased housing target set by the mayor should ensure every opportunity for the optimisation of appropriate sites for residential, whilst also meeting 'provide capacity' targets should be taken. The existing industrial locations within this site are deemed more suitable for additional industrial capacity given their current uses and designations, allowing the car park to be allocated for residential. This site could provide approximately 70 new homes in line with DNLP policy H1 and NPPF chapter 11.	Support for the allocation is welcomed. As the site is not identified as SIL or LSIS in the existing Local Plan, or in the draft, the principle that no net loss of industrial capacity does not apply to sites previously used for land for transport functions which are no longer required does not apply as would be the case set out in 6.4.8 of the London Plan. Nevertheless, as Brent is a provide capacity it needs to be able to identify additional industrial capacity where the opportunity arises. The point of identifying BEGA1 and seeking masterplanning is that a wider review is taken of the area and it is planned to make the best use of its potential which means sites currently used for one purpose might be appropriate for a new set of purposes.	No Change.
5.2 East	BEGA1	Quintain	Object. The allocation covers a wide and diverse area with different land ownerships and aspirations. Whilst a masterplan may cover the whole area, the allocation should be split into several allocations to enable a more site specific focus, and provide greater clarity on timescales. The masterplan should also include the involvement of all stakeholders, from conception to completion through a series of workshops.	The Council has appointed a person who will start work on the masterplan soon. This should progress to such an extent that it should not unreasonably delay considerations of applications for sites that potentially could come forward early, such as the college site. Reference to engagement in association with the masterplanning process is considered appropriate.	Add to BEGA1 Planning Considerations: "....in the area. <u>The masterplanning exercise will be undertaken involving key stakeholders, landowners and developers to help shape its content from conception to completion.</u> "

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.2 East	BEGA1	Aggregate Industries UK Ltd	Aggregates Industrials UK depot at Wembley is long established and meets a vital need for the sustainable important of aggregate, asphalt, and ready mixed concrete into London and should therefore be safeguarded. The NPPF states that existing, planned and potential sites for the bulk transport, handling and processing of minerals, concrete and aggregates should be safeguarded. In addition, NPPF states that planning policies should ensure new development can be integrated with existing facilities, and that they should not have unreasonable restrictions placed on them as a result of development permitted after they were established. DNL policy Si10 states that development plans should ensure sufficient capacity of aggregate rail depots is available and where practicable expand capacity adjacent to rail depots adjacent to major construction projects. Therefore the following text should be inserted into allocation BEGA1: 'the presence of an existing active rail aggregate depot to the west of the allocation needs to be considered to ensure future development proposals do not place unreasonable restrictions on this existing operation which is of strategic importance for the sustainable supply of aggregates into London.'	It is recognised that the aggregates operation provides an important function. The eastern part of the Growth Area's location adjacent to operational rail lines, plus the fact that it is expected that any redevelopment will have to re-provide industrial type floorspace on site, aligned with other policies in the development plan such as London Plan Policy D13 Agent of Change should ensure that design and layout of new development provides acceptable solutions for a satisfactory residential environment whilst providing adequate protection of existing noise generating uses. Nevertheless, identification of the implications of the aggregates facility on potential development within the growth area is considered appropriate.	Amend BEGA1 Planning considerations to include: <u>"The presence of an existing active rail aggregate depot to the west plus matters such as the proximity to operational railways and the need to re-provide industrial uses on site needs to be considered to ensure future development proposals do not place unreasonable restrictions on non-residential uses whilst creating a high quality residential environment."</u>
5.2 East	BEGA1	John Cox	The proposed masterplan for the Neasden Stations Growth Area should cover the neighbouring Church End Growth Area also. It states in BP5 and BP2 respectively that you will: 'safeguard land for the West London Orbital route' and the latter: '...and associated infrastructure'; why the difference? How will this be safeguarded and is it only public land that is included? The Plan should include positive wording that gives the masterplan a sound steer, documenting reasonable possibilities and constraints for the area. The USP for the Growth Area is having both a grade-separated junction and a major road, and two rail stations at right angles of one another, giving easy rail access to much of north and west London. The historic desire to connect Great Central Way to Neasden Lane should not be taken forward. One potential option (which should be referenced in the Plan) is to consider some of the area as two vertical layers. The lower to provide logistics warehousing connected to the North Circular via Great Central Way to the north, which would have no access to the south but would provide (from connection with the M1) a storage site for last mile delivery. Above that and lowering to ground floor further away would be housing and a new local retail centre. The units would be predominantly car free with no road access to the north. Easy access to the stations is integral for the Growth Area. The railway lines could serve as either a barrier, or an opportunity for architects to devise solutions. It is difficult to ascertain whether or not both logistics and housing providers would be interested in such a concept, with its given risks, however, it should be tested nonetheless. This should not negatively impact the function of	The two areas are being considered separately but the links between them will be identified and any mutual dependencies made clear. For BP2 there is likely to be a requirement for station infrastructure/ access points to the station, etc. which could require more land take than within the ownership of the rail infrastructure bodies. The potential of the stations is identified and recognised through the designation of the Growth Area status. The site levels provide an opportunity to accommodate two separate functions, which the masterplanning can further develop/ test. Access to the north across rail lines presents possibilities, but also obstacles. The potential for the Dudding Hill Line to link to the Chiltern Line as identified through previous Crossrail feasibility work is understood. Nevertheless, there is no scheme/ project identified for delivery within the lifetime of the Plan and the reservation of a corridor will compromise significant parts of the Growth Area, without any clarity on its real environmental impacts and how development should address these. As such, it is not considered appropriate for this Plan to identify a potential corridor through the site. Masterplanning will assist with providing a deliverable improvement of the Church End centre. Whilst the centre is performing poorly, its enhancement could improve its fortunes. If not, the Local Plan provides the flexibility to allow loss of retail frontage to other uses that retain active frontage	No change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
			both Neasden and Church End town centres. The integration of the railway lines within the Growth Area requires thorough analysis of the corridors needs over the next 50 year period. Neasden is on the Jubilee line, with unused metropolitan line platforms. If the Growth Area and WLO are successful, it would be possible to change the through-running, if only during off-peak hours, rather like Piccadilly line trains which sometimes stop at Turnham Green District Line station. The only heavy rail line route out of London Marylebone splits in two south of Neasden's North Circular girder bridges. From there the western arm is the Chiltern Mainline which continues to Birmingham, and the north-western Chiltern Aylesbury Branch, which runs alongside the Metropolitan/ Jubilee lines stopping first at Harrow-on-the-Hill. The Dudding Hill Freight Line crosses the heavy rail and Underground tracks at right angles just south of Neasden Station on a four-track-abutment bridge, with only two tracks fitted with spans. Finally there is a descending single-track chord, from the Dudding Hill Line south to the Chiltern Main Line west. Current layout stops trains reaching the Aylesbury branch. The chord to the Chiltern Mainline is mainly used as a reception siding for mineral trains that reverse into the Great Central Way cement works siding on the inside chord. These sidings could be connected again to the Dudding Hill Line at their other end which would make it unused commercially, although network rail would likely want to maintain the link for stock and maintenance trains. The primary requirement within the masterplan should be to protect the possibility of a 1990s planned flyover from the Dudding Hill Chord to the Chiltern Aylesbury Branch. Such a flyover south of the North Circular Road avoids any flat junction across the Chiltern Main Line, which is already at capacity. You should research the history of that provision. It is not acceptable to totally rely on strategic planning by Network Rail, which is sometimes opportunistic in pursuing merely short-term gains. There seems no great strategy at the Department for Transport either. An example was the lack of support for a fit-for-purpose, high-capacity Dudding Hill Line connection at any Brent Cross station on the Midland Main Line, That situation was only reversed by accusing Network Rail of maladministration, non-compliance with the Nolan Principles of Public Life, and by threatening to take it to the high court. Church end is the least attractive retail road in the borough. Oppose requirement within BSSA3 for retention of active frontages at ground floor, as is not justified. This section of the road has too many shops. Let those on the south be bolstered by their loss. The car tyre site on the south is inappropriate with cabling running across the pavement, and should be supported to relocate.	and failing that should this not be viable, eventually residential.	

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.2 East	BEGA2	Amafhh Investment Limited	g) The policy should allow other uses as part of a mixed use development compatible with the industrial and employment nature of the Staples Corner SIL as part of mixed-use development, including residential, religious and community uses, hotel and conference centre.	g) Taking account expanding the list of acceptable uses is not considered appropriate at this time.	No Change.
5.2 East	BEGA2	Amafhh Investment Limited	b) Clarity is required for current non-SIL compliant uses and/or where they have fallen into disrepair/no longer usable. The GLA's 'Industrial Intensification and Co-Location Study: Design and Delivery Testing' Section 2.2 states "non-industrial floorspace (e.g. B1A, A and D uses classes) ..not in use in support of an industrial activity (e.g. standalone offices, retail, leisure etc., tenanted by a non-industrial business) is not included in the industrial floorspace calculation, but is to be included in the potential industrial floorspace calculation that could be accommodated on the site at a 65% plot ratio". The policy should be amended to make it clear that sites/properties not in (or last used for) industrial use and/or no longer usable should not provide like for like replacement industrial floorspace, but rather the 65% plot ratio.	b) As the London Plan and associated documents sets out what happens in these circumstances, there is no need for the Brent Local Plan to repeat this.	No Change.
5.2 East	BEGA2	Amafhh Investment Limited	d) The policy needs to include a timescale for the masterplan's completion/adoption, ideally by 2020.	d) Initial feasibility work on masterplanning is being undertaken with the GLA and Barnet. As the policy is challenging in terms of GLA policy outcomes and represents an early exploration of Intensification on a SIL site, work will take some time. This is accommodated in the delivery timescales, as the Plan does not identify any potential dwellings coming forward in the first 10 years of the Plan.	No Change.
5.2 East	BEGA2	Amafhh Investment Limited	f) The policy does not reflect London Plan transport node policies (e.g. Policy GG2, GG5, D1A, D1B, E1 and E10) which seek to intensify land use, additional homes and workspaces, promoting higher density development and range of uses, in locations well-connected to existing and future public transport. The range of uses and density of development should reflect the opportunity.	f) At this stage prior to significant progress on the masterplan, an expansion of the range of uses is not supported at this time in policy.	No Change.
5.2 East	BEGA2	GLA	Staples Corner is SIL and as such DNLP policies E4, 5, and 7 should apply, intensifying and enhancing its industrial, storage and distribution functions and capacity. Co-location of non industrial uses would only be considered acceptable through a process of consolidation and intensification of industrial uses, enabling the released of some SIL without an overall net loss, prioritising B2 and B8. Reprovision of industrial uses would need to be established before release of SIL could be considered.	This is noted. The Council is looking to work positively with the GLA and Barnet in preliminary masterplan work to understand how this can be delivered. The Council does however ask for greater flexibility from the GLA in terms of the consideration of the ambition for the place and opportunity that Staples Corner brings from not just intensification but also co-location.	No Change.
5.2 East	BEGA2	Amafhh Investment Limited	Support the principle of Staples Corner Growth Area as a whole but concerned about policy wording: a) The policy is not consistent with draft London Plan's Policy E7 objectives to "ensure...overall...no net loss of industrial floorspace ...(and operational yard space capacity) within ...SIL and LSIS." Policy BEGA2 seeks to prevent loss of "employment floorspace". London Plan Policy E4 Part A specifies 'industrial' uses. Policy BEGA2 creates confusion by using 'employment floorspace'. It should be	a) This is a fair point. Part A of the London Plan policy does set out a range of industrial uses. As such reference in the policy will be changed to industrial.	Amend BEGA2 to remove references to "employment" and replace them with "industrial".

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
			amended to refer to the need for replacement 'industrial floorspace', instead of 'employment floorspace'		
5.2 East	BEGA2	Amafhh Investment Limited	c) It is inflexible on development in advance of the Staples Corner masterplan (although Paragraph 5.2.18 gives a mixed message). A development embargo before the masterplan's completion is inappropriate (conflicting with Paras 49 and 50 of the NPPF). It is potentially damaging redevelopment occurring in time for the new Brent Cross Thameslink station's 2022 completion. The policy should be amended to be more in line with paragraph 5.2.18.	c) The London Plan indicates the range of uses acceptable within SIL, where non-industrial uses are proposed it requires a masterplan. In advance of the masterplan being agreed, where a site owner wants to bring forward a SIL compliant use the Council would welcome early engagement with a view to seeking to support the delivery of the development taking account of any draft masterplan.	No Change.
5.2 East	BEGA2	Amafhh Investment Limited	e) Brent Cross Thameslink station will open in 2022 not 2024.	e) Agreed, the station is planned to open in 2022 currently.	Amend references to Brent Cross Thameslink to confirm the opening date of 2022.
5.2 East	BEGA2	Natural England	Brent Reservoir SSSI is referred to as Welsh Harp. Whilst acknowledging this local name, we recommend the official name (Brent Reservoir SSSI) is listed clearly. This will allow relevant information to be found when doing research for information on the SSSI. Recreational disturbance caused by opening up the site for more public access would be a planning consideration in particular when delivering the BEGA2: Staples Corner Growth Area which is adjacent to the SSSI. Suggest a supporting policy noting the need to protect the SSSI, including management of visitor recreational disturbance.	Agreed a reference to Brent Reservoir SSSI in the policy is appropriate. Given the SSSI's status it is important that its ecological importance is not undermined. Reference to this can be added in the policy.	Amend Policy BEGA2 Planning Considerations: "....Open Space, <u>Brent Reservoir</u> Site of Special Scientific Interest, Site of....." Amend Policy BEGA2 Planning Considerations: ".....breeding wetland birds. <u>Natural England have also identified, given the ecological status of the area, the need to protect the SSSI particularly with regards to potential disturbance from visitor recreational activities.</u> "
5.2 East	BEGA2	Thames water	Water: the scale of development is likely to require upgrades to the water supply network, and as such the developer and LBB should liaise with Thames Water at the earliest opportunity to agree a phasing plan. Failure to do so will increase the need for planning conditions being sought to control phasing. This should include a housing phasing plan stating what phasing may be necessary to ensure development does not outpace capacity improvement works. Waste: The wastewater network capacity in this area may be unable to support demand, and requiring upgrades to drainage infrastructure. The developer should liaise with Thames Water to determine if a drainage strategy is necessary, stating where, when and how it will be delivered. This should be submitted with the application.	This has been adequately addressed in the infrastructure requirements.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.2 East	BEGA2	TfL Spatial Planning	Reg 19 update/ required changes: "The Council together with TfL will consider the extent to which the area can support car-free development and mitigate impacts through suitable improvements to public transport, active travel and measures to not adversely impact on neighbours' amenity of any potential parking displacement. There is a need to work with TfL and Barnet Council to provide improved links from the site to the proposed new station and wider Brent Cross regeneration area."	This change is considered appropriate to address the potential to reduce car use but also ensure existing residents are not adversely impacted.	Update policy BEGA2 Planning considerations with: <u>"The Council together with TfL will consider the extent to which the area can support car-free development and mitigate impacts through suitable improvements to public transport, active travel and measures to not adversely impact on neighbours' amenity of any potential parking displacement. There is a need to work with TfL and Barnet Council to provide improved links from the site to the proposed new station and wider Brent Cross regeneration area."</u>
5.2 East	BESA1	GLA	Predominantly industrial uses and lies within Wembley OA. Both designations should be treated in accordance with the DNLP. The site is bound by SINCS to the east, south and west, with a conservation area directly to the south. Allocation of B1-B8 needs to be clarified to make clear only B1(c), B2 and B8 uses would be acceptable, in accordance with policies E7 and E1 of the DNLP. B1(a) should be directed toward town centres and office clusters. The identified need for office space is very small at approximately 44,000m2, as established by the ILDS 2017.	The site is not within the Wembley Opportunity Area, but is predominantly industrial. It is agreed that to be consistent with the London Plan it should clarify B1(c), B2 and B8 uses will be sought and the policy should be amended.	Amend policy BESA1 Allocated Use to: <u>"...replacement of the existing B1(c), B2 and B8 floor space uses and on the McDonalds site A1-A5 and/or B1(c), B2 and B8 employment uses,...."</u> Amend policy BESA1 Indicative capacity to <u>"3886 5647 sqm B1-B8 on the existing employment sites (0.65 plot ratio) and 400 sqm A1-A5 uses/B1(c), B2 and B8 on the McDonalds."</u> Amend policy BESA1 Justification to: <u>".....ensure continued provision of employment industrial space, so will seek its retention of employment these uses on site."</u>
5.2 East	BESA1	Thames water	Water: the scale of development is likely to require upgrades to the water supply network, and as such the developer and LBB should liaise with Thames Water at the earliest opportunity to agree a phasing plan. Failure to do so will increase the need for planning conditions being sought to control phasing. This should include a housing phasing plan stating what phasing may be necessary to ensure development does not outpace capacity improvement works. Waste: There should be no issues concerning wastewater capacity. The developer and LBB should still liaise with Thames Water at the earliest opportunity to advise on phasing.	This has been adequately addressed in the infrastructure requirements.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.2 East	BESA1	Mary Duffy	Aitch have been given planning permission for the redevelopment of the brick reclaimers yard for a 6 storey building. Consultation with existing residents was almost non-existent. Taller than 6 storeys should not be allowed. The entire site is in floodplain and an area that Thames Water identify with a flooding sewers problem.	Noted. The policy sets out a 5-6 storey height for the site. Small parts of the site are currently within the 1:100 year fluvial floodplain, but substantial parts are not. It is accepted that it is surrounded by fluvial floodplain and that in the future the site, if more extreme events of flooding occur, such as a +70% event, the area will be within Zone 3 floodplain. The site policy is clear applications should take a sequential approach to development on the site. This will seek to avoid floorspace within the current floodplain, but in the exceptional circumstances where this cannot be the case, suitable mitigation measures will be in place to protect people and property on site and not unacceptably increase flood risk elsewhere. Permission 18/2984 indicates that suitable mitigation measures can be put in place to ensure that development can be made acceptable. The need to address Thames Water requirements early in the development process has been identified in the policy.	Amend BESA1 to account for a proposed update to the SFRA Level 2 document.
5.2 East	BESA2	Thames water	Water: the scale of development is likely to require upgrades to the water supply network, and as such the developer and LBB should liaise with Thames Water at the earliest opportunity to agree a phasing plan. Failure to do so will increase the need for planning conditions being sought to control phasing. This should include a housing phasing plan stating what phasing may be necessary to ensure development does not outpace capacity improvement works. Waste: There should be no issues concerning wastewater capacity. The developer and LBB should still liaise with Thames Water at the earliest opportunity to advise on phasing.	This has been adequately addressed in the infrastructure requirements.	No Change.
5.2 East	BESA3	SMC Investcorp	Support allocation. The site was previously occupied by Gower House School which closed in 2016. There is no evidence to justify the D1 use needs reproviding in this location. The private school has not been used for 3 years as was no longer viable. There is no legal requirement for a private school to be reprovided. The sites context and characteristics limit the suitability of reprovion which was made evident when it went for sale in 2016. Implications of D1 retention will include a lengthy marketing process, delaying delivery of much needed homes. The site can deliver a greater number of homes (~60) than has been identified, aligning it more closely with the NPPF which seeks to optimise efficient delivery.	Support for the allocation is welcomed. Consistent with the London Plan policy S1 Developing London's Infrastructure Criterion G, "redundant social infrastructure should be considered for full or partial use as other forms of social infrastructure before alternative forms of developments are considered....." In supporting development of sites for new dwellings, the Council has been clear in the Plan that this must not be wholly at the expense of other uses which are of less value and therefore likely to find it hard to compete for premises that become available either as a going concern or providing the potential for other non-residential uses. e.g. draft Policy BH2. On this site the Council recognises that its position along what on a wider level has been identified as an intensification corridor provides the opportunity for an intensification of the use of the site, principally for housing. Nevertheless, this should not be at the expense of the potential for social infrastructure premises to support community needs/demands. As such it considers that some replacement D1/ community use floorspace is justified.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.2 East	Blank East	Mary Duffy	Local Plan proposes significant and unwelcomed changes to local character within the East Place. Residents do not support tall buildings. There should be no reduction of conservation areas.	Significant change is not proposed for the majority of the East Place, it will be concentrated in two identified growth areas and along some intensification corridors which have good access to public transport. Tall buildings are required to meet the needs related to the projected growth in population of the borough which cannot be met wholly using low rise development. The review of Neasden conservation area will be subject to its own statutory process, which will have to take into account consultation responses.	No Change.
5.2 East	Blank East	Mary Duffy	The Welsh Harp should be preserved as a SSSI and wildlife refuge.	The Welsh Harp will be preserved as a SSSI and its status is reflected in the policy, its potential recreational value will need to be balanced against not undermining its SSSI status.	No Change.
5.2 East	Blank East	Mary Duffy	There is no mention of Neasden Recreation Ground, a park which has been neglected/ deliberately run down by the Council.	The Neasden Recreation Ground is included within the wider Welsh Harp open space designation as on the ground there is no specific delineation of its boundaries.	No Change.

5.3 NORTH

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.3 North	Figure 16	Rolfe Judd Planning	Reference to LSIS should be clearly defined and specifically identified within the supporting text, and within figure 16 where they should be included within the key. Figure 16 refers to 'Key Employment Sites' which do not have clear extents and nor are they clearly defined. Therefore clarification is sought as to the nature of a Key Employment Site, and their relationship with LSIS.	Noted. LSIS has been referenced where appropriate, including within site specific allocations. The spatial distribution of LSIS can be seen on the policies map. For simplicity figure 16 currently bunches together SIL and LSIS sites under 'Key Employment Sites'. This is seen as clear and should not require further clarification. See amendment proposed in relation to Place Plans identifying more detailed boundaries can be found on the policies map.	No Change.
5.3 North	Figure 16	Rolfe Judd Planning	Figure 16 is poor quality and needs to be higher resolution. The figure needs to include clear identification of surrounding streets and property boundaries. If not possible within the plan, a separate file should be made available.	The policies map on the Council's website provides detailed boundaries which will enable zooming into locations to occur, reference to this can be made adjacent to the Figure. It is accepted that some street names could assist in orientation and that where High Level Plans of the Place should include them where this does not undermine the simplicity/ clarity of the Figure.	All High Level Plans of the Place amend: Include some street names to assist with orientation. All High Level Plans of the Place amend: "High Level Plan of the Place. <u>More detailed boundaries can be seen on the Policies Map</u> "
5.3 North	BP3	Rolfe Judd Planning	Remove masterplanning requirement from criterion D.	Draft London Plan policy E7 requires designated employment sites which have been allocated for redevelopment through co-location to be either Plan-led, or subject to a masterplan approach. Given the size and complexity of this site, and the LB Brent's designation as a 'provide capacity' borough, it is deemed as necessary for this site to come forward through a masterplan approach. The Brent Local Plan itself provides the basic structure for how we see this site coming forward, whereas a masterplan will provide more specific guidance which would not be appropriate to include within the Plan itself. This is also appropriate given the sites numerous land owners, and will therefore negate any probability of the sites piecemeal delivery. The draft London Plan requires sites to maximise delivery of homes. This assurance can only be secured through a masterplan approach, allowing for optimum site occupation.	No Change.
5.3 North	BP3	Daniel Hulsmann	Criterion h) Fryent Way is largely part of Fryent Country Park and any development would encroach on the park's setting, going against the NPPF and the aims of the plan.	Noted. H) The Council has significant housing targets to meet the needs of its population growth. The London Plan includes a small sites housing target. In order to prepare positively for this, the Plan has identified a number of 'Intensification Corridors'. This corridor is set a respectable distance away from the park itself. Applicants will be expected to take the context of the area into consideration, including the park and its approach.	No Change.
5.3 North	BP3	Daniel Hulsmann	Criterion I) Adding floors to homes will not solve housing shortages and no evidence has been provided that would prove otherwise.	I) Intensifying current low density housing within the borough will help provide additional homes. The requirement to prepare positively for small sites development is a requirement within the London Plan.	No Change.
5.3 North	BP3	DTZ Investors	Support as identified as acceptable for tall buildings, and seeks continued residential development.	Support welcomed.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.3 North	BP3	DTZ Investors	Object as criterion N, O, & P are not justified or effective. Each should be amended so as to state that their requirement is 'subject to objectively assessed needs.'	Noted. The Indoor Sports and Leisure Needs Assessment (2018) notes that this place has a number of strategic sports halls. In order to ensure the boroughs demand is met, their capacity will need to be improved. With regards to a new swimming pool, it states 'Identify opportunities to potentially meet the need for a new leisure facility that incorporates swimming pool provision.' This is further strengthened in paragraph 5.3.37 which states 'the Council will consider the need for a new leisure facility within this place, <u>taking into consideration an up-to-date analysis of demand.</u> ' The wording of the policy, supported by this clause, is deemed sufficient in establishing when such a facility will be identified as necessary. Similarly with regards to secondary schooling, the Council will not plan to build unnecessary accommodation to over-provide spaces as this would not reflect a prudent use of resources, as such provision will be based on identified needs.	No Change.
5.3 North	BP3	Mercedes-Benz Retail Group	Overall aspiration of policy supported, however, lacks detail and quantum within the homes section which reduces its effectiveness. The inclusion of a place based housing target would help set the tone for the North Place in relation to the wider borough targets. Policy also requires masterplanning in the Capitol Way Valley which, although would be useful, would be better placed in the supporting text rather than the policy itself. This will restrict land coming forward ahead of the masterplanning and subsequent land assembly process. Paragraph 5.3.28 is more positively worded in this respect, including: "in advance of the adoption of a masterplan for this site, the council will resist small scale release, unless it can be shown to not undermine the outcomes of any likely adopted masterplan". The masterplanning process may be slow, requiring consultation and extensive resources and will therefore inhibit delivery in the short to medium term. In summary, the text referring to masterplanning should be removed from the policy, relying instead on the supporting text in paragraph 5.3.28.	The North Place Growth Area Policy (BNGA1) outlines the quantum of homes for the Burnt Oak and Colindale Growth Area. Policy BH2 prioritises Growth Areas for housing delivery and aims for at least 60% of homes to be located within Growth Areas. Draft London Plan policy E7 requires designated industrial sites which have been allocated for redevelopment through co-location to be either Plan-led, or subject to a masterplan approach. Given the size and complexity of this site, and the LB Brent's designation as a 'provide capacity' borough, it is deemed as necessary for this site to come forward through a masterplan approach. The Brent Local Plan itself provides the basic structure for how we see this site coming forward, whereas a masterplan will provide more specific guidance which would not be appropriate to include within the Plan itself. This is also appropriate given the sites numerous land owners, and will therefore negate any probability of the sites piecemeal delivery. The draft London Plan requires sites to maximise delivery of homes. This assurance can only be secured through a masterplan approach, allowing for optimum site occupation. This is seen to justify the inclusion of the non-LSIS land to be subject to a masterplan also. This will help the site come forward coherently, provide a framework for all land owners to work within providing certainty, create a better sense of place, ensure essential infrastructures are provided, and enable the required quantum of residential and employment floorspace to be delivered. Paragraph 5.3.28 builds in some flexibility which is seen as sufficient, stating that 'the Council will resist small scale release, unless it can be shown to not undermine the outcomes of any likely adopted masterplan.' The provision of a masterplan as a coherent vision for the area will help bring forward the site comprehensively, allowing for the joint delivery of essential infrastructures and social infrastructure.	No Change.

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5.3 North	BP3	Savilles on behalf of client	Support, however, reference to need for masterplan at Capitol Valley site in part d, and 5.3.28 is not justified in context of paragraph 35 of NPPF. It is not clear how or when this will come forward, and if not timely would be prejudicing potential sustainable development in conflict with paragraph 11 of NPPF. DNLP states that intensification and co-location should come forward as part of a Plan-led approach OR masterplanning process. Therefore BNGA1, BP2, BE2, and BNSA1 set out a clear enough vision for the area for development to accord with. With regards to the masterplanning approach, the GLA Practice Note (2018) suggests that these can either be developed ahead of planning applications or alongside. This should be a 2 stage process with the first identifying appropriate areas for intensification or co-location (the Local Plan essentially covers this), with stage 2 focussing on the more detailed outputs of specific areas. BNSA1 does have detailed specification to some extent, however, it is seen that stage 2 could be completed at pre-application process. The policy suggests that any applications would be premature until a masterplan is in place, and these grounds are not sufficient to reject an application. This is supported by NPPF paragraphs 49 & 50 as there would be clear policies in place that set out the vision for the area. See suggested wording with regards to the above in full comment.	Noted. Draft London Plan policy E7 requires designated employment sites which have been allocated for redevelopment through co-location to be either Plan-led, or subject to a masterplan approach. Given the size and complexity of this site, and the LB Brent's designation as a 'provide capacity' borough, it is deemed as necessary for this site to come forward through a masterplan approach. The Brent Local Plan itself provides the basic structure for how this site will come forward, whereas a masterplan will provide more specific guidance which would not be appropriate to include within the Plan itself. This is also appropriate given the sites numerous land owners, and will therefore negate any probability of the sites piecemeal delivery. The draft London Plan requires sites to maximise delivery of homes. This assurance can only be secured through a masterplan approach, allowing for optimum site occupation. This will help the site come forward coherently, provide a framework for all land owners to work within providing certainty, create a better sense of place, ensure essential infrastructures are provided, and enable the required quantum of residential and employment floorspace to be delivered. Paragraph 5.3.28 builds in some flexibility which is seen as sufficient, stating that 'the Council will resist small scale release, unless it can be shown to not undermine the outcomes of any likely adopted masterplan.' A masterplan process will help bring forward the site comprehensively, allowing for the joint delivery of essential infrastructures and social infrastructure. The drive for landowners to co-operate to bring forward the site comprehensively has not been demonstrated. Therefore, in order to ensure efficient development of land, the Council sees it as necessary to continue down the masterplanning route, and not alongside an application.	No Change.
5.3 North	BP3	TfL Commercial Development	Support tall building development within Intensification Corridors, Town Centres (including Kingsbury), with particular support with regard to residential development within Town Centres. Whilst we support the approach taken in the tall building study, we consider the limitation on heights within part B of policy BP3 of between 5 and 6 storeys to be overly restrictive. This inhibits the efficient use of land and will discourage development. This should be made flexible in line within NPPF and DNLP, allowing the determination of heights on a case by case basis. This should consider the visual, functional, environment and cumulative impacts, including the local context, infrastructure capacity, existing and planned connectivity and accessibility.	Noted. Tall buildings should be directed toward the Tall Building Zones. These provide sufficient scope for upward development. The London Plan supports the identification of areas appropriate for tall buildings, such as clusters. The development of significantly tall buildings outside of these areas will undermine the Council's strategy in consolidating them, whilst retaining the general low-rise character elsewhere. Sites which are appropriate for greater development have been identified as site allocations, are within growth areas, or are within Tall Building Zones. The proposed heights within town centres are seen as appropriate to balance the function of the centres, whilst providing for additional sustainable housing development. The policy allows for the potential for taller buildings in strategic locations in town centres, thus there is some further flexibility in these locations.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.3 North	BP3	Rolfe Judd Planning	Colindale LSIS should be referred to as Capitol Way Valley.	Noted. To avoid confusion between the Capitol Way Valley site allocation, and the LSIS land within, it is seen as appropriate to differentiate. The proposed transformational change will encompass the vast majority of the site allocation, with the remainder being heavily influenced by such changes within a forthcoming comprehensive masterplan.	No Change.
5.3 North	BP3	Daniel Hulsmann	Criterion i) The role of Kingsbury as an ethnic food destination should not be enhanced as the food has high food miles and would not be sustainable and would be disastrous for the origin communities suffering over farming.	i) Much of the food will be locally sourced, either substituting different ingredients for those used traditionally, or providing locally (UK) grown alternatives. In addition its often dried/ preserved nature means that it can be shipped on the seas rather than by air. Catering to foreign markets helps provide income and currency for origin countries and if done correctly through Fairtrade can improve quality of life in those locations.	No Change.
5.3 North	Para 5-3-26	Rolfe Judd Planning	It should be specified that tall buildings will be allowed in Capitol Way Valley.	The current wording of the paragraph, stating that tall buildings will be promoted within the Burnt Oak and Colindale Growth Area, is seen as appropriate. This includes the Capitol Way Valley site, but also further sites within the area. Reference to tall buildings on this site has been made within the site allocation (BNSA1) within the 'design principles' section. Further detailing regarding the specific height and location of tall buildings will be outlined in the proposed masterplan.	No Change.
5.3 North	Para 5-3-27	Rolfe Judd Planning	Reference to a masterplanning process should be removed from this paragraph.	Draft London Plan policy E7 requires designated employment sites which have been allocated for redevelopment through co-location to be either Plan-led, or subject to a masterplan approach. Given the size and complexity of the 3 key sites within this place, and the LB Brent's designation as a 'Provide Capacity' borough, it is deemed as necessary for this site to come forward through a masterplan approach. The Brent Local Plan itself provides the basic structure for how the sites will come forward, whereas a masterplan will provide more specific guidance which would not be appropriate to include within the Plan itself. For those sites which do not contain within their boundaries designated industrial land, it is seen as appropriate given the multitude of land owners, and therefore the likely avoidance of a piecemeal approach to delivery. The draft London Plan requires sites to maximise delivery of homes as appropriate. A masterplan is seen as the only feasible means of ensuring such delivery is maximised, and that piecemeal delivery does not preclude the sites optimum occupation.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.3 North	Para 5-3-28	Rolfe Judd Planning	Suggest deletion of this clause.	Draft London Plan policy E7 requires designated employment sites which have been allocated for redevelopment through co-location to be either Plan-led, or subject to a masterplan approach. Given the size and complexity of this site, and the LB Brent's designation as a 'provide capacity' borough, it is deemed as necessary for this site to come forward through a masterplan approach. The Brent Local Plan itself provides the basic structure for how we see this site coming forward, whereas a masterplan will provide more specific guidance which would not be appropriate to include within the Plan itself. This is also appropriate given the sites numerous land owners, and will therefore negate any probability of the sites piecemeal delivery. The draft London Plan requires sites to maximise delivery of homes. This assurance can only be secured through a masterplan approach, allowing for optimum site occupation. The paragraph does build in some flexibility to the clause which is seen as sufficient, stating that 'the Council will resist small scale release, <u>unless it can be shown to not undermine the outcomes of any likely adopted masterplan.</u> '	No Change.
5.3 North	Para 5-3-40	Rolfe Judd Planning	LSIS sites should be clarified, and referenced within Figure 16.	Noted. The policy map (which upon adoption will be made interactive) includes all appropriate layers, including site allocations and employment land designations. This is seen as sufficient so as to allow for overlaying and cross comparison. In addition, if a designation such as LSIS is included within the boundary of a site it is specified within the site allocation. The maps such as figure 16 are included to show a broad overview of the key spatial designations within each place. Those designations included are seen as appropriate, with the inclusion of additional designations only serving to reduce its function. This currently bunches together SIL and LSIS sites under 'Key Employment Sites'. This is seen as clear and should not require further clarification.	No Change.
5.3 North	Para 5-3-47	Rolfe Judd Planning	Reference to a masterplanning process should be removed from this paragraph.	Draft London Plan policy E7 requires designated employment sites which have been allocated for redevelopment through co-location to be either Plan-led, or subject to a masterplan approach. Given the size and complexity of this site, and the LB Brent's designation as a 'provide capacity' borough, it is deemed as necessary for this site to come forward through a masterplan approach. The Brent Local Plan itself provides the basic structure for how we see this site coming forward, whereas a masterplan will provide more specific guidance which would not be appropriate to include within the Plan itself. This is also appropriate given the sites numerous land owners, and will therefore negate any probability of the sites piecemeal delivery. The draft London Plan requires sites to maximise delivery of homes. This assurance can only be secured through a masterplan approach, allowing for optimum site occupation.	No Change.
5.3 North	BNGA1	DTZ Investors	Support as: policy affords flexibility, and promotes mixed use regeneration along axis of Edgware road.	Noted.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.3 North	BNGA1	Savilles on behalf of client	Support mixed use regeneration, particularly through intensification and co-location within LSIS which is consistent with the DNLP. We suggest reference to co-location is strengthened to identify need to optimise residential. This would need align more closely with paragraphs 117 & 118 of NPPF, and DNLP policy E7 which seek to prioritise delivery of residential.	Noted. The allocation is already seen to provide sufficient weight toward the delivery of residential development. The LB Brent has been identified within the new London Plan as a 'Provide Capacity' borough. It is therefore prudent that we maximise the delivery of industrial floorspace on SIL and LSIS sites. Therefore we cannot accept that residential will be prioritised to the detriment of other uses, especially industrial and other employment uses. A future masterplan will address how the site can best accommodate a complementary quantum of both residential and employment floorspace, without compromising the ability to meet either target.	No Change.
5.3 North	BNGA1	Mercedes-Benz Retail Group	Supportive of the continued inclusion of the Mercedes site within the Growth Area boundary and the aspirations of Policy BP3: North. The inclusion of a housing and employment target for this growth area is also strongly supported. Promotion of effective land use and density optimisation would assist in meeting Brent's employment and housing needs. The emphasis on reduction in traffic dominance and promotion of active along Edgware Road is welcomed. The Mercedes site will assist with this.	Noted.	No Change.
5.3 North	BNSA1	Savilles on behalf of client	Support allocation, however, is heavily reliant on a masterplanning process. The allocation should not state that development will not be permitted until a masterplan has been adopted. This is not justified or positively prepared, and is inconsistent with DNLP policy E7 and would prevent sustainable development unnecessarily. The Council could not sustain an objection of prematurity if the Plan has not been adopted. As stated previously, this site, BNGA1, and BN3 meet the plan-led approach set out in E7. In summary a masterplan is supported but it should not preclude development, and should be produced with local stakeholders. In addition, the following points should be added: north south, east west connectivity improvements; landowners should work pro-actively with the council to bring forward timely development that is aligned with the place vision; applications prior to masterplan adoption must consider the sites relationship with the remaining allocation, and work with other landowners to ensure this; make effective use of land and optimise housing delivery; 76-77 Capitol Way is a crucial gateway site and able to accommodate significant co-located residential that will tie the LSIS with the residential to the west.	Draft London Plan policy E7 requires designated industrial sites which have been allocated for redevelopment through co-location to be either Plan-led, or subject to a masterplan approach. Given the size and complexity of this site, and the LB Brent's designation as a 'provide capacity' borough, it is deemed as necessary for this site to come forward through a masterplan approach. The Brent Local Plan itself provides the basic structure for how we see this site coming forward, whereas a masterplan will provide more specific guidance which would not be appropriate to include within the Plan itself. This is also appropriate given the sites numerous land owners, and will therefore negate any probability of the sites piecemeal delivery. The draft London Plan requires sites to maximise delivery of homes. This assurance can only be secured through a masterplan approach, allowing for optimum site occupation. This will help the site come forward coherently, provide a framework for all land owners to work within providing certainty, create a better sense of place, ensure essential infrastructures are provided, and enable the required quantum's of residential and employment floorspace to be delivered. Paragraph 5.3.28 builds in some flexibility which is seen as sufficient, stating that 'the Council will resist small scale release, <u>unless it can be shown to not undermine the outcomes of any likely adopted masterplan.</u> ' A masterplan process will help bring forward the site comprehensively, allowing for the joint delivery of essential infrastructures and social infrastructure. All stakeholders will be engaged during the masterplanning process. Specific detailing with regards to the whereabouts of tall buildings and 'gateway sites' will be outlined within the forthcoming masterplan, and is not an appropriate detailing at this time. It should also be noted that	BNSA1 Design Principles amend: "...Access to the site to be considered carefully to ensure no conflict is created between different users <u>and the potential for north-south and east-west pedestrian and cycle connections in particular between Stag Lane and Edgware Road to be enhanced in number and quality....</u> "BNSA1 Indicative capacity amend: "A future masterplanning process <u>involving site owners/ occupiers and other stakeholders</u> will provide clarity"

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
				Brent can identify a 5 year housing land supply and is not reliant on sites within this allocation that do not have planning permission for early delivery, i.e. within the next 10 years. As such a timescale has been built into delivery that allows masterplanning to be undertaken. The need to consider potential to improve east/west movement is considered to have merit. The Council would also expect to engage with stakeholders during the masterplanning process to ensure that the process is robust and likely to result in deliverable outcomes.	
5.3 North	BNSA1	Rolfe Judd Planning	Current text implies whole site is identified for industrial uses and is LSIS, this should be amended to refer to 'mixed-use' development.	This is accepted, parts of the site are not designated as LSIS and the Plan should be updated to reflect this.	Existing use amend: " <u>Transitioning mixed use and a Locally significant industrial site containing a range of uses.....</u> "
5.3 North	BNSA1	Rolfe Judd Planning	Correction of the 0-5 year range to a total of 414 dwellings (rather than 14) as provided for under permission 17/0837. Reinstatement of target figures (114) for the 5-10 year range.	The previous figures included the 414 units (as granted under permission 17/0837) spread across the two periods, with 300 (0-5) and 114 (5-10). Therefore, given the increased certainty of delivery in the short term, the two quantum's have been consolidated into the 0-5 year period. The 10+ year figure has been reduced from 786 to 686 as the former was seen as too optimistic given competing pressures on the site. However, a detail capacity analysis will be undertaken via the masterplan approach, resulting in a more accurate capacity figure.	BNSA1 Timescale for Delivery 0-5 years amend: " <u>414</u> "
5.3 North	BNSA1	Rolfe Judd Planning	The Planning Considerations should not include any reference to the requirement of undertaking a masterplanning process.	Draft London Plan policy E7 requires designated employment sites which have been allocated for redevelopment through co-location to be either Plan-led, or subject to a masterplan approach. Given the size and complexity of this site, and the LB Brent's designation as a 'provide capacity' borough, it is deemed as necessary for this site to come forward through a masterplan approach. The Brent Local Plan itself provides the basic structure for how we see this site coming forward, whereas a masterplan will provide more specific guidance which would not be appropriate to include within the Plan itself. This is also appropriate given the sites numerous land owners, and will therefore negate any probability of the sites piecemeal delivery. The draft London Plan requires sites to maximise delivery of homes. This assurance can only be secured through a masterplan approach, allowing for optimum site occupation.	No Change.

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5.3 North	BNSA1	Aberdeen Standard Investments	Allocated use remains unchanged, and therefore we reiterate previous comments, supporting its allocation for mixed-use redevelopment including employment, residential and social uses. The site capacity and timeframe for delivery have been changed. Question the need to include specific timeframes for housing delivery, especially as the site capacity will be subject to a masterplanning process which itself is reiterated in part d) of policy BP3. This will serve as a potential barrier to delivery. We also question why the site capacity has been changed from 1200 to 500, particularly given the overall housing target increase from 23,711 to 27,482. The site is included within the amended Burnt Oak and Colindale Growth Area as part of the wider Opportunity Area, and can accommodate significant growth. In recognition of the 'Intend to Publish' London Plan housing targets for Brent (23,250) more emphasis should be placed on increasing intensification on this site, particularly residential. This would contribute to the London Plans objective to 'meet and ideally exceed the final adopted housing target'. Moreover, increasing delivery would help facilitate the provision of family accommodation, in recognition of the need to provide 65% of additional homes as 3 beds, and to meet affordable housing targets at local and strategic levels. In light of this, and given the site is highly accessible and within an Opportunity Area, if timeframes cannot be omitted, figures should be increased so that they reflect those in the Preferred Options draft (300 0-5, 114 5-10, and 786 10+) culminating in 1200 total units. Previous comments stating residential development should be directed toward the west, with more intensive industrial uses (within B2 & B8) to the east remains valid. This will help protect residential amenity of existing residents. As does the contentions with height, scale and massing which should be maximised, where appropriate subject to design consideration such as stepping down to 2/3 storey units in the west. The requirement of the entirety of the site to go through a masterplanning process prior to delivery imposes an unnecessary barrier to redevelopment on a site whose delivery is crucial to meeting employment and housing targets. The process may take up to 18 months to adopt before any development can take place.	Noted. See proposed change. The allocated use includes mixed use development including employment uses and co-location with other uses. This is sufficiently flexible so as to include additional uses. The timeframe for delivery is indicative only, and through the Housing Trajectory, provides a basis for Council forecasting. It also increases the effectiveness of the plan at meeting the Mayor's housing targets. Taken into account the amended typo, the site capacity has been reduced from 1200 to 1100. This has been revised in the context that LB Brent has been identified within the new London Plan as a 'Provide Capacity' borough. It is therefore prudent that we maximise the delivery of industrial floorspace on SIL and LSIS sites. Therefore we cannot accept that residential will be prioritised to the detriment of other uses, especially industrial and other employment uses. A future masterplan will address how the site can best accommodate a complementary quantum of both residential and employment floorspace, without compromising the ability to meet either target. The draft London Plan requires sites to maximise delivery of homes. This assurance can only be secured through a masterplan approach, allowing for optimum site occupation. This is seen to justify the inclusion of the non-LSIS land to be subject to a masterplan also. This will help the site come forward coherently, provide a framework for all land owners to work within providing certainty, create a better sense of place, ensure essential infrastructures are provided, and enable the required quantum's of residential and employment floorspace to be delivered. Specific detailing with regards to the layout, location, and types of development will be outlined within the forthcoming masterplan, and is not an appropriate detailing at this time. The masterplan will help provide clarity as to the specific site capacity. A masterplan process will likely serve as a barrier in the immediate short term, however, the provision of a masterplan as a coherent vision for the area will help to ease the concerns of otherwise uninterested land owners.	BNSA1 Timescale for Delivery 0-5 years amend: "414"
5.3 North	BNSA1	Thames water	Wastewater network may be insufficient. Local upgrades to drainage may be required. Where a constraint exists, the developer should liaise with Thames Water to determine a strategy which should be submitted with the planning application.	Noted. The likely requirement of wastewater infrastructure upgrades, and need to liaise at earliest opportunity with Thames Water to agree upon a housing and infrastructure phasing plan is included within Infrastructure requirements. London Plan policy requirements on surface water drainage apply to all major developments. Flood risk issues are highlighted under planning considerations.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.3 North	BNSA1	Rolfe Judd Planning	Site boundary: Updated to include clear identification of the LSIS and its boundaries. Updated to include clear identification of 'Key Employment Lands' boundaries. In the event that LSIS and 'Key Employment Lands' comprise the same area, it is suggested this be rationalised and a single consistent description be provided.	Noted. The policy map (which upon adoption will be made interactive) includes all appropriate layers, including site allocations and industrial land designations. This is seen as sufficient so as to allow for overlaying and cross comparison. In addition, if a designation such as LSIS is included within the boundary of a site it is specified within the site allocation. The maps such as figure 16 are included to show a broad overview of the key spatial designations within each place. Those designations included are seen as appropriate, with the inclusion of additional designations only serving to reduce its function. This currently bunches together SIL and LSIS sites under 'Key Employment Sites'. This is seen as clear and should not require further clarification.	No Change.
5.3 North	BNSA1	Rolfe Judd Planning	Indicative capacity should be removed as covered within timeframe for delivery.	Noted. Indicative capacity provides a total dwelling capacity as seen as feasible at this stage, whereas the timeframe provides a breakdown of delivery temporally. However, it should be noted that these figures are only indicative, with a more accurate figure being sought through a forthcoming masterplan approach.	No Change.
5.3 North	BNSA1	Rolfe Judd Planning	BNSA1 should be referred to as Capitol Way Valley and should not include reference to LSIS.	Agreed that the text can be amended to make it clearer, although it should still make reference to LSIS.	BNSA1 Description of the existing site amend: ".....Located to the <u>east of the LSIS within the site allocation</u> is a car dealership and associated <u>servicing workshops, parking/ storage land</u> . A petrol station forms the north <u>eastern</u> ~~western~~ corner."
5.3 North	BNSA1	Rolfe Judd Planning	It should be made clear that reference to LSIS is not in relation to the Capitol Way Valley site.	Agreed that the text can be amended to make it clearer, although it should still make reference to LSIS.	BNSA1 Policy Justification amend: ".....Furthermore, the intensification/ colocation of the LSIS and <u>Capitol Way Valley with the Burnt Oak and Colindale Growth Area</u> will contribute to meeting the 'provide capacity' status given to Brent within the London Plan. Currently, although the vacancy rates are low, the site is not intensively used and contains a number of two storey buildings that vary in condition. ~~The LSIS~~ -Capitol Way Valley also has good access to services and amenities which will support intensification/ co-location."

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.3 North	BNSA1	Rolfe Judd Planning	Masterplanning and development freeze – Capitol Way Valley. Supporting text refers to the Capitol Way Valley as being LSIS which reads as though the whole site allocation is LSIS which is not the case. Timeframe for delivery identifies 14 units within first 10 years which is an error as approved scheme has permission for 414 units. Requirement for masterplanning effectively freezes development on site which is unreasonable and unnecessarily prohibitive. This requirement, given longstanding area growth targets, and without clear timeline or guidelines creates significant uncertainty for land owners and developers, reducing the plans effectiveness and development viability. Whilst this approach is considered best practice, it typically occurs prior to redevelopment. Given the advanced stage of development within the area this requirement would result in market uncertainty and compromise delivery. Further, such an approach has already been compromised by the granting of permission of significant development in the area to date, including 08/2823 & 17/0837. These permissions were reached via consultation with the Council, and did not require a masterplan. Overall it is considered that masterplanning is unnecessary as there is sufficient policy in place, and sites with extant permission to enable efficient development. A masterplan would incur significant additional costs and extended timeframes resulting in uncertainty and undue delay. DNLP policy E7 suggests that the renewal of LSIS may be subject to a masterplanning process. In this regard, as having existed in planning policy for a significant period, BNSA1 satisfies the requirement to be considered part of a plan-led process and that it does not require being part of a masterplan process. The current wording within this chapter also suggests that both the LSIS and non-LSIS sections of land within this allocation will require masterplanning which is considered unreasonable and contradictory to the requirements of DNLP policy E7.	Draft London Plan policy E7 requires designated employment sites which have been allocated for redevelopment through co-location to be either Plan-led, or subject to a masterplan approach. Given the size and complexity of this site, and the LB Brent's designation as a 'provide capacity' borough, it is deemed as necessary for this site to come forward through a masterplan approach if non-industrial uses are to come forward as part of the redevelopment of the LSIS. The Brent Local Plan itself provides the basic structure for how we see this site coming forward, whereas a masterplan will provide more specific guidance which would not be appropriate to include within the Plan itself. This is also appropriate given the sites numerous land owners, and will therefore negate any probability of the sites piecemeal delivery. The draft London Plan requires sites to maximise delivery of homes in association in the case of Brent to an intensification of industrial land to provide additional capacity. This assurance can only be secured through a masterplan approach, allowing for optimum site occupation. This is seen to justify the inclusion of the non-LSIS land to be subject to a masterplan also, as depending on the amount of residential that can be delivered, associated social infrastructure may also be required which needs to be planned for. This will help the site come forward coherently, provide a framework for all land owners to work within providing certainty, create a better sense of place, ensure essential infrastructures are provided, and enable the required quantum's of residential and employment floorspace to be delivered. Paragraph 5.3.28 builds in some flexibility which is seen as sufficient, stating that 'the Council will resist small scale release, unless it can be shown to not undermine the outcomes of any likely adopted masterplan.' In the case of proposals for pure industrial development within LSIS that are consistent with the London Plan in meeting minimum on site re-provision, the Council will take a more flexible approach. Similarly on sites outside the LSIS flexibility is could also possible depending on circumstances.	No Change.
5.3 North	BNSA1	Rolfe Judd Planning	This site accommodates a retail car dealership and is fundamentally A1 use and should not be grouped as B use class and should be considered separate to LSIS to the west. Whilst the site currently includes a service component, given current market trends, increased service intervals for modern vehicles and a push toward electrified vehicles, this role will likely lessen over time and may be relocated. Therefore any future development should maintain and enhance this principle retail function. This should also apply for the adjoining Lexus site and Asda site. Given the scale of the Asda site and its associated increase in catchment, any future redevelopment should maintain a supermarket component. These sites should therefore not be referred to as industrial sites or Key Employment Sites and excluded from LSIS.	The car dealership is not included within the LSIS land designation, however, it does incorporate a substantial vehicle service element which falls within B2. As such the Council considers that this element should be regarded as a local employment site. As Brent is a 'Provide Capacity' borough, it will be expected that the Mercedes site provides at the least no net loss of industrial floorspace. It is accepted that a car retailing element may sought to be retained/re-provided as part of the redevelopment of this site which may well also incorporate residential development on the upper floors and on the remainder of the site not required for industrial use. This is not considered to be inconsistent with the allocation. The allocation is not seeking to prevent things happening, it is looking to ensure a coherent and comprehensive approach to	BNSA1 planning considerations amend: ".....impact assessment. Similarly the retention of a retail car dealership function on the Mercedes site is also considered appropriate if required as part of an intensification of floorspace and provision of other allocated uses on that site."

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
				creating a community that has an appropriate mix of uses, social infrastructure and place-making that is also consistent with the London Plan designation of the borough needing to provide more industrial capacity.	
5.3 North	BNSA1	Rolfe Judd Planning	Exclusion from LSIS and Key Employment Site designation. The location, function and future uses of the site should be clarified to ensure previous land designations are carried forward correctly in the Plan. The site allocation boundary should not generically refer to LSIS within said boundary, particular considering a significant portion of the site is not LSIS, nor does it contain any industrial uses.	Noted, see changes proposed in relation to other representations made by the respondent on this site.	No Change.
5.3 North	BNSA1	Mercedes-Benz Retail Group	Incorporation of the Mercedes site within this allocation is welcomed. The dealership floorspace will be rationalised and re-provided along with dwellings on upper floors. This will protect employment space. The draft policy is not sufficiently positively prepared. Requiring masterplanning of the whole allocation prior to any planning application being prepared and submitted may unnecessarily delay deliverability. The site's current adopted allocation has not sought to restrict the individual parcels of development coming forward. Consequently, delivery of TRQ adjacent has occurred. Moving forward early delivery of the Mercedes site will not prejudice the development potential of the wider allocation. It is outside LSIS and subject to the existing adopted allocation. Masterplanning benefits are apparent, but might well be time consuming to complete. The following text should be deleted from the planning considerations subsection of the draft policy: "the whole site will be subject to a masterplan process to comprehensively identify how it can increase useable employment floorspace, whilst contributing to the council's vision for the Burnt Oak and Colindale area of creating 'a mixed, vital, accessible and pleasant district'. Until a masterplan for the site has been agreed/ adopted by the council, no redevelopments (apart from 17/0837) will be permitted within this area".	Noted. Draft London Plan policy E7 requires designated employment sites which have been allocated for redevelopment through co-location to be either Plan-led, or subject to a masterplan approach. Given the size and complexity of this site, and the LB Brent's designation as a 'provide capacity' borough, it is deemed as necessary for this site to come forward through a masterplan approach. The Brent Local Plan itself provides the basic structure for how this site will be developed, whereas a masterplan will provide more specific guidance which would not be appropriate to include within the Plan itself. This is also appropriate given the sites numerous land owners, and will therefore negate any probability of the sites piecemeal delivery. The draft London Plan requires sites to maximise delivery of homes. This assurance can only be secured through a masterplan approach, allowing for optimum site occupation. This is seen to justify the inclusion of the non-LSIS land to be subject to a masterplan also. This will help the site come forward coherently, provide a framework for all land owners to work within providing certainty, create a better sense of place, ensure essential infrastructures are provided, and enable the required quantum's of residential and employment floorspace to be delivered. Paragraph 5.3.28 builds in some flexibility which is seen as sufficient, stating that 'the Council will resist small scale release, <u>unless it can be shown to not undermine the outcomes of any likely adopted masterplan.</u> ' The Mercedes site has been allocated for a decade with no definitive progression of its redevelopment by its owners. The provision of a masterplan as a coherent vision for the area will help to ease the concerns of otherwise uninterested land owners. This will help bring forward the site comprehensively, allowing for the joint delivery of essential infrastructures and social infrastructure. Sites with extant planning permission will be considered when drawing up the masterplan. The existing site allocation did not have this requirement as the extent of redevelopment of this area was smaller in scale. The wider area, plus the need to meet draft new London Plan policy E7, and the identification of Brent as a 'Provide Capacity' borough mean that the site's inclusion within the masterplan boundary is considered appropriate.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.3 North	BNSA1	Aberdeen Standard Investments	Our client respectfully requests that the text of BNSA1 be amended as follows – (proposed additional text is bold and underlined and text to be removed is struck through): Until a masterplan for the site has been agreed/ adopted by the council, no redevelopments (apart from 17/0837) will be permitted within this area. Future proposals for redevelopment will need to ensure they do not prejudice the future delivery of a wider masterplan.” This wording removes the barrier of a masterplan, whilst preventing harmful piecemeal development. LBB retains control of site delivery via the planning application process.	Paragraph 5.3.28 builds in some flexibility which is seen as sufficient, stating that 'the Council will resist small scale release, unless it can be shown to not undermine the outcomes of any likely adopted masterplan.'	No Change.
5.3 North	BNSA1- BNSA3	GLA	The reconfiguration of LSIS should follow the approach set out in Draft New London Plan Policy E7. This means that reconfiguration of industrial uses within LSIS should be intensified to increase industrial floorspace capacity (or at the very least there should be no net loss). However, considering that Brent is a 'provide capacity' borough reconfigurations of this type should be aiming to increase industrial floorspace capacity contributing to a net gain across the whole borough over the plan period. Where BNSA1 overlaps with the Brent Cross/Cricklewood OA this should be made clear in the site plan.	Agreed, the text will be amended to provide greater clarity on this.	Paragraph 5.3.46 amend: "....the Growth Area boundary has been extended. <u>This new boundary is considered to form an extension to the Burnt Oak and Colindale Opportunity Area boundary previously identified to be within Brent.....</u> " Policies Map amend: Show the area within the Burnt Oak and Colindale Growth Area as also being the Burnt Oak and Colindale Opportunity Area. Policy BNSA1 Allocation amend: ".....comprising areas of ~~employment~~ <u>employment industrial</u> intensification....." Policy BNSA1 Planning Considerations amend: "....Locally Significant Industrial Site. <u>The Council considers it appropriate for co-location which will be delivered consistent with London Plan policy E7. The whole....</u> " Policy BNSA1 Planning Considerations amend: "....how it can increase useable ~~employment~~ <u>employment industrial</u> floorspace....." Policy BNSA1 Planning Considerations amend: "....how it can increase useable ~~employment~~ <u>employment industrial</u> floorspace,...." Policy BNSA1 Design Principles amend: "...enhance, its <u>industrial/employment function....</u> "
5.3 North	BNSA2	DTZ Investors	The term 'employment space' should be defined as it is currently unclear what is meant by this.	Accept that employment space could be more clearly defined.	BNSA2 Allocated Use amend: "Mixed use development to include residential, retail and ~~employment~~ <u>replacement industrial and office space/affordable workspace.</u> " BNSA2 Description of Existing Site amend: "Forming the southern part of the site is a car dealership,

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
					<u>servicing centre/workshop</u> and associated car parking."
5.3 North	BNSA2	DTZ Investors	Correction: PTAL ranges from 2-'4', with the southern part 2/'3', and the central part 3/'4'.	PTAL essentially ranges from 2-3 with a very small portion of the site located within 4, however, this can be reflected in the policy.	Amend: The PTAL rating of the site varies from 2- ~~3~~ <u>4</u> . The majority of the northern and southern part is within PTAL rating 2, with the central part achieving PTAL rating 3- <u>4</u> .
5.3 North	BNSA2	DTZ Investors	'Development at this site should avoid having any detrimental impact on the setting of this building', which is in reference to the listed Beis Yaakov Primary School and Nursery, should not be stated. The Beis Yaakov Primary School and Nursery is a non-designated heritage asset and therefore subject to NPPF test paragraph 197. This disproportionately overstates the heritage significance of the property.	The heritage asset, the point is accepted and the policy will be amended.	BNSA2 Planning considerations: ~~"Development at this site should avoid having any detrimental impact on the setting of this building."~~
5.3 North	BNSA2	DTZ Investors	Infrastructure requirements: Thames Water has indicated upgrades to the wastewater network are likely to be required 'subject to justification.' Infrastructure requirements need to relate to the impacts of development, not just existing development.	It states within the Infrastructure Requirements section that Thames Water will need to be engaged at the earliest opportunity. This will serve to provide justification for the potential requirement of wastewater infrastructure at the time of delivery associated with the increase in development intensity on the site.	No Change.
5.3 North	BNSA2	DTZ Investors	Support allocation for mixed use development including residential and retail uses.	Support welcomed.	No Change.
5.3 North	BNSA2	DTZ Investors	Capacity should be revised to 800 as current indicative capacity of 500 equates to 125 DPH. The current LP would prescribe 170-405 DPH in an area with this PTAL.	The current capacity figure is indicative only. A forthcoming masterplan will provide a more specific capacity figure going forward. Although within a Tall Building Zone the capacity identified takes account of the need to reprovide industrial/ office space (or its replacement with affordable workspace) and other non-residential floorspace. Brent has been identified as a 'Provide Capacity' borough. It is therefore important that existing sites with employment uses (particularly industrial) that residential development is not prioritised to the detriment of other uses.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.3 North	BNSA2	DTZ Investors	Commercial and retail elements should not be retained. Site allocations propose land uses, not retention of elements. This is not in accordance with NPPF or LP, especially the retention of out of centre retail.	The Council is aware that the existing retail onsite appears to be trading effectively. In order to provide sufficient value, and therefore incentivise further intensification of the sites, notwithstanding its out of centre location the policy was written to allow for re-provision of some retail at this site, if this is not required from a financial viability perspective, the Council would not actively seek replacement on the scale that currently exists.	BNSA2 Planning considerations: <u>“The site contains some existing Local Employment Sites in the form of industrial floorspace related to the servicing of vehicles as part of the car dealership and the office provision of Southon House. Consistent with the borough’s provide capacity status in the London Plan the industrial floorspace should be replaced in line with London Plan policy E7. The office space will be subject to Brent policy BE3. As it is out of centre, the site is not a priority location for retail in terms of the sequential test. Nevertheless, the Council is aware that the retail element appears to be trading well, so is likely (subject to other London Plan and Local Plan retail policies) be receptive to re-provision of some retail if it is necessary from a viability perspective to encourage the site’s more intensive development that makes for a more efficient use of land.”</u>
5.3 North	BNSA2	DTZ Investors	Impact on the A5, and A5150 intersection as a result of introducing residential development at this site', should not be included within the risks. It is unclear what the actual risk is, and how residential uses could impact the A5. This should be clarified.	The risk associated with the impact on the A5 is due to cost of any junction improvements and its impact on viability, plus also timing that can be reflected in the policy.	BNSA2 risks: “access to be reconsidered. <u>This may increase costs affecting viability or slow down delivery.</u> ”
5.3 North	BNSA2	Thames water	Wastewater network may be insufficient. Local upgrades to drainage may be required. Where a constraint exists, the developer should liaise with Thames Water to determine a strategy which should be submitted with the planning application.	Noted. Likely requirement of wastewater infrastructure upgrades, and need to liaise at earliest opportunity with Thames Water to agree upon a housing and infrastructure phasing plan included within Infrastructure requirements. London Plan policy requirements on surface water drainage apply to all major developments. Flood risk issues are highlighted under planning considerations.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.3 North	BNSA3	Blue Coast Capital	Support acknowledgement that masterplan process may reveal greater capacity than previously anticipated. We expect the capacity to be substantially increased. This is particularly true that whilst the allocation states no more than 6 storeys, a development of up to 7 storeys has been approved within the same allocation suggesting the potential for greater densities to be achieved. Therefore the allocation should not refer to a particular capacity or appropriate heights as may lead to false expectations and failure of site optimisation.	Noted. The capacity is only indicative at this stage. Through the Housing Trajectory, this provides a basis for Council forecasting. It also increases the effectiveness of the plan at meeting the Mayor's housing targets. The allocation states that development heights should be around 6 storeys. This builds in sufficient flexibility so as to allow for a variation of appropriate heights. The site does not benefit from very good public transport connectivity and as such has not been identified as a Tall Buildings Zone where buildings of over 10 storeys would be appropriate. Reflecting its acceptability as a mid rise location, around 6 storeys is seen as reasonable.	No Change.
5.3 North	BNSA3	Thames water	Wastewater problems unlikely. Developer and Brent should liaise with Thames Water at earliest opportunity to advise on phasing.	Noted. Representations made at Preferred Options stage stated 'the scale of development is likely to require upgrades to the wastewater network.' Therefore the following text has been input under the infrastructure requirements for this site allocation: 'Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to being required to meet additional demands created through the development.' It is considered that the wording is best retained within the site allocation to ensure that such infrastructure is considered should it be required by development.	No Change.
5.3 North	BNSA4	Thames water	We are unable to assess this site as no figures have been provided.	Noted. The existing building on this site is Grade II Listed. This imposes significant constraints upon the site's development, and therefore understanding the quantum of residential is difficult. To provide comfort similar to other allocations, the need to liaise with Thames Water at an early stage can be identified in the infrastructure requirements.	BNSA4 Infrastructure Requirements amend: " <u>Thames Water will need to be engaged at the earliest opportunity to agree a infrastructure phasing plan to ensure essential water infrastructure is delivered prior to being required to meet additional demands created through the development.</u> "
5.3 North	BNSA4	Theatres Trust	Support design principles and promotion of community uses.	Support welcomed.	No Change.
5.3 North	BNSA8	TfL Commercial Development	Welcome addition of site allocations for Wembley Park Bridge Road and Queensbury Station Car Park. However, the indicative capacity for Queensbury Station Car Park is too low and should be increased to 50 which is more appropriate and feasible if this site is to be optimised in line with DNLP policy H1 and NPPF chapter 11.	Noted. The capacity is indicative only. If it can be demonstrated through application that the site can be better utilised through sustainable development then permission may be granted. It currently assumes that the existing car parking is replaced on the ground floor and that development is mid-rise, consistent with the scale of the surrounding area.	No Change.
5.3 North	Blank North	Daniel Hulsmann	Not sustainable. No regard for impact on wider area. Fails to consider impacts on nearby SINC sites, conservation areas, and transport.	Noted. The Council needs to plan to accommodate as best it can identified housing needs for its increases population. In order to prepare positively for this target a number of sites have been allocated for development. The allocations include within them the necessary considerations which need taking at application stage prior to receiving permission. More detailed impact upon SINC sites will be evaluated at this stage, and in accordance with the policies set out within this and the London Plan. Specifically policy BGI1 will ensure sufficient mitigation	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
				and enhancements are undertaken when assessing impact on SINC sites. Policy BHC1 ensures heritage is considered if a development is seen to have an impact on any heritage assets. Transport is dealt with via a number of policies, including BT1 and BT2 which seek to reduce reliance on personal vehicles, and increase the uptake of sustainable travel modes, including public transport, walking and cycling.	

5.4 NORTH WEST

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.4 North West	Figure 20	Northwick Park Partnership	Northwick Park Growth Area should be shown on Figure 20 to help with identification.	Although the Northwick Park Growth Area is shown, it is not labelled specifically. Labelling it will make it clearer on this Figure and would also be useful on other High Level Plans of the Place.	Amend each High Level Plan of the Place to specifically name its respective relevant Growth Areas.
5.4 North West	BP4	Brent Parks Forum	Parks should be retained and enhanced, especially in light of projected population growth, and their impacts on health. The Plan should be explicit in recognising the need to retain both Tenterden Sports Ground and the John Billam Playing Fields as sports facilities and open space, and that required funding will be secured. These sites are used by the Forest United Football Club. This is recognised in policy BP4, criterion H, however, there is no mention of the John Billam Playing Fields. John Billam is referenced in paragraph 5.3.7, but it does not state it will be protected as green space. The open space in the area is limited, with schools being deficient, and therefore all open space should be retained. This has been addressed in the Strategic Approach to Playing Pitch Provision in Brent 2016, in addition to the Open Space, Sports and Recreation Study 2019.	Both sites are shown on the policies map as open space and as such will benefit from the associated policy protection in the London and Brent plans. It is recognised that reference to John Billam Playing Fields could be made in policy BP4 H.	Policy BP4 h) amend "....Claremont High School, <u>John Billam Playing Fields</u> and Tenterden Sports Ground"
5.4 North West	BP4	David Pearson	Parks should be retained and enhanced, especially in light of projected population growth, and their impacts on health. The Plan should be explicit in recognising the need to retain both Tenterden Sports Ground and the John Billam Playing Fields as sports facilities and open space, and that required funding will be secured. These sites are used by the Forest United Football Club. This is recognised in policy BP4, criterion H, however, there is no mention of the John Billam Playing Fields. John Billam is referenced in paragraph 5.3.7, but it does not state it will be protected as green space. The open space in the area is limited, with schools being deficient, and therefore all open space should be retained. This has been addressed in the Strategic Approach to Playing Pitch Provision in Brent 2016, in addition to the Open Space, Sports and Recreation Study 2019.	Both sites are shown on the policies map as open space and as such will benefit from the associated policy protection in the London and Brent plans. It is recognised that reference to John Billam Playing Fields could be made in policy BP4 H.	Policy BP4 h) amend "....Claremont High School, <u>John Billam Playing Fields</u> and Tenterden Sports Ground"
5.4 North West	BP4	Angela Barrett	Too many people already. Park lands should not be developed.	Noted. National policy requires the Council to plan to meet its identified housing needs related to its growth in population. The London Plan has set Brent a significant housing target to meet its identified need and that of the wider London area. To prepare positively for this, the Council must allocate sufficient land for development to meet housing targets and other targets such as employment land, social infrastructure etc. No open space has been designated for development in this Plan. The exception to this is a proposed 'land swap' at Northwick Park. This will involve the existing pavilion site. The pavilion will be demolished and reprovided closer to the station on the same size plot of land as the existing pavilion. The existing pavilion plot will be landscaped with green open space, improving the openness of the park, the new pavilion and its utility.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.4 North west	BP4	Sports England	It is noted that policy BP4 seeks to protect and enhance playing pitches at Northwick Park, JFS School, Claremont High School and Tenterden Sports Ground. However, NPPF paragraph 97 and Sport England Playing Field Policy, require the protection of playing fields which goes beyond just the playing pitch. The references to playing pitches should, therefore, be amended to playing field so it aligns with the NPPF and Sport England Policy.	Noted. This should be incorporated into the policy.	BP4 h) amend: "Protecting and enhancing playing ~~pitch~~ <u>field</u> provision at....."
5.4 North West	BNWGA1	Thames water	Wastewater network may be insufficient. Local upgrades to drainage may be required. Where a constraint exists, the developer should liaise with Thames Water to determine a strategy which should be submitted with the planning application.	Noted. Likely requirement of wastewater infrastructure upgrades, and need to liaise at earliest opportunity with Thames Water to agree upon a housing and infrastructure phasing plan included within Infrastructure requirements. London Plan policy requirements on surface water drainage apply to all major developments. Flood risk issues are highlighted under planning considerations.	No Change.
5.4 North West	BNWGA1	Owners of the Ducker Pond site, Northwick Park, Nilkanth Estates, part of the BAPS Shri Swaminarayan Mandir community	See PDF for further details. De-designate Ducker Pond site from MOL land to allow for reinstatement of community, sport/leisure and social infrastructure to reflect its previously developed status. This would complement development plans at Northwick Park, and the golfing facilities to the south. The proposed development (see pdf) would facilitate the enhancement of the Capital Ring, achieve biodiversity net gain supporting the SINC status, and increase sporting/leisure & community events within the area. When considered together, these factors amount to exceptional circumstances that justify the alteration of MOL boundary. This would therefore be compliant with NPPF, DNLP policies GG1, GG2, GG3€, S1, S4, S5, G1, G6, and G3 in particular, especially considering the recent panels report on the NDLP.	The site is identified currently as part of the MOL. There is the opportunity within MOL policy to consider a wider range of recreational uses consistent with this designation. The site is covered by a TPO, provides habitat for bats which are a protected species and is one of the few woodland habitats within Brent. Its replacement in terms of compensatory ecological measures of mature/ semi-mature woodland will be difficult to achieve in the short to medium term. For the more significant interventions in order to be consistent with MOL objectives, there is likely to be a need for compensatory re-provision of MOL elsewhere within the vicinity, with the most obvious area being the Northwick Park growth area. Given the MOL and ecological status of the site, which would appear to be a significant impediment to significant buildings/ structures within the site, at this stage it is not considered appropriate to incorporate the site within the Northwick Park Growth Area. Nevertheless, if suitable alternative solutions can be shown to overcome significant policy concerns, then it might be appropriate to consider this site as part of that wider area.	No Change.
5.4 North west	BNWGA1	Sports England	Welcomes amendment in including requirement for the Ball Strike Assessment. However, it would be more effective and consistent with NPPF (para 182) if it continued to state: "Should the ball strike assessment identify the need for ball stop mitigation then this should be implemented prior to the development's impact on the use of playing field".	This is accepted as a reasonable request to ensure the playing fields' use is not compromised.	BNWGA1 Planning considerations amend: "....A ball strike assessment will be required <u>and any necessary ball stop mitigation implemented prior to the development's impact</u> to ensure that new development does not compromise the role of the MOL in terms of sports provision....."
5.4 North West	BNWGA1	GLA	MOL land swaps are not supported in the DNLP. However, LP policy G3C states that any alterations to MOL boundaries should be through a Plan-led approach. Therefore this should be clearly set out within the new Local Plan and be subject to extensive consultation. Exceptional circumstances will need to justify such alterations.	Noted. The MOL land swap has been identified within the new Local Plan, with the Council's intentions clearly laid out. Brent, as part of the Northwick Park development operation, and under the One Public Estate programme, realises the requirement to justify alterations through exceptional circumstances, and the need to undertake extensive consultation.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.4 North West	BNWSA1	Thames water	Wastewater problems unlikely. Developer and Brent should liaise with Thames Water at earliest opportunity to advise on phasing.	Noted. Representations made at Preferred Options stage stated 'the scale of development is likely to require upgrades to the wastewater network.' Therefore the following text has been input under the infrastructure requirements for this site allocation: 'Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to being required to meet additional demands created through the development.' It is considered that the wording is best retained within the site allocation to ensure that such infrastructure is considered should it be required by development.	No Change.
5.4 North West	BNWSA1	Mick Ruse	The railway land is not in public ownership, having been purchased from British Rail in 2008. The land is owned by myself and my wife, and enquiries should be directed to us.	Noted. See proposed changes.	BNWSA1 Ownership amend: "Private and small part public ownership"
5.4 North West	Blank North West	Angela Barrett	Open space should not be developed.	Noted. No open space has been designated for development in this Plan. The exception to this is a proposed 'land swap' at Northwick Park. This will involve the existing pavilion site. The pavilion will be demolished and reprovided closer to the station on the same size plot of land as the existing pavilion. The existing pavilion plot will be landscaped with green open space, improving the openness of the park, the new pavilion and its utility.	No Change.

5.5 SOUTH

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.5 South	Page 152	Wembley Towers Limited	Note reference (page 152) to Wembley Point, Bridge Park Leisure Centre and the Unisys Building at Stonebridge Park currently presenting an unattractive borough gateway. There are a number of sites within close proximity to Stonebridge Park station that have the scope (either individually or cumulatively) to make a dramatic transformational change to the townscape. This can be through high quality design, enhanced permeability and optimised housing delivery through providing taller buildings, particularly to offset the negative aspects of the North Circular and to respond to the strong urban frontage.	Noted. This is reflected in the allocations of those sites and their identification within a Tall Buildings Zone.	No Change.
5.5 South	Page 152	Stonebridge Real Estate Development	Note reference (page 152) to Wembley Point, Bridge Park Leisure Centre and the Unisys Building at Stonebridge Park currently presenting an unattractive borough gateway. There are a number of sites within close proximity to Stonebridge Park station that have the scope (either individually or cumulatively) to make a dramatic transformational change to the townscape. This can be through high quality design, enhanced permeability and optimised housing delivery through providing taller buildings, particularly to offset the negative aspects of the North Circular and to respond to the strong urban frontage.	Noted. Such proposals will be considered at application stage. This will consider the host of policies within this Plan, the London Plan, and the NPPF. The identification of the area as a Tall Buildings Zone takes into account the potential for transformational change in this location.	No Change.
5.5 South	BP5	OPDC	Create strong links between Harlesden Town Centre and Old Oak via Willesden Junction, and from Harlesden and Stonebridge to Park Royal, through wayfinding and public realm improvements. Enhance cycle routes from Harlesden to Old Oak.	Support and future co-operation welcomed.	No Change.
5.5 South	BP5	Wembley Towers Limited	Supportive. Note criterion b) requirement. BCP5 criterion c) is supported in relation to the potential for taller buildings at Wembley Point with no reference to specific heights. Wembley Point provides an existing marker; building height will be dependent on the design quality, technical considerations and local context developed at application stage, with appropriate scaling and location of buildings related to its hinterland. Supportive of approach set out in paragraph 5.5.14 recognising a cluster of taller buildings could be appropriate in this gateway location to the borough.	Noted. The Tall Buildings Strategy sets out the appropriate heights for this location in the range of up to 26 storeys, similar to Wembley Point equivalent.	No Change.
5.5 South	BSGA1	thersa	A mammoth undertaking for the council to think it can sustainably revolutionise Church End into a nice place. Attitudes and actions of some people will undermine regeneration and renewal. To make lasting improvements requires improvement to people's attitudes and their appreciation of the benefits of modern society. Agree that Church End is in desperate need of regeneration, but for the plans to be realistic, you have to educate people about how bad things have been. Think nature, think natural rather than murals or mosaics. Maybe introduce car-free areas/pedestrianised areas to improve air quality. Work with local shops to improve the Church End area, which need greater diversity and reduce the need to travel. They are mostly owned and frequented by newer ethnic groups without a sufficiently broad appeal. The decline has become deeply	Noted. The Plan is aspirational, but also deliverable. The area is desirable for investors given its proximity to the newly identified Neasden Stations Growth Area, and the proposed West London Orbital site. It will become more so once its profile is raised through major development. Funds provided through predicted forthcoming development will help enhance the area's urban environment, with Plans to open up Church End to broaden its appeal. Both natural and artistic solutions will be used, neither at the expense of the other.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
			entrenched, with action required to address anti-social behaviour and provide pleasant facades to enhance the environs.		
5.5 South	BSSA1	Kelaty Properties LLP	Principle of Asiatic Carpets site being required to provide industrial floorspace. The site has been used for TV and film production purposes for a continuous period in excess of 10 years and thus is not in Business Use class uses. Policies E4 & E7 of the draft London Plan does not require non-‘industrial’ uses to be re-provided where the site has been allocated for residential or mixed-use. This site already benefits from an existing allocation for residential. Notwithstanding this, the Council state that Brent’s ‘provide capacity’ status in Table 6.2 of the draft London Plan means that the allocation should provide for a mixed-use development, including an increase in industrial floorspace. Draft London Plan Paragraph 6.4.6 states: “Boroughs in the ‘Provide Capacity’ category...should seek to deliver intensified floorspace capacity in either existing and/or new locations accessible to the strategic road network and in locations with potential for transport of goods by rail and/or water.” It is clear the London Plan does not expect all existing industrial sites to be retained and intensified, but to focus in areas accessible to the strategic road network and with potential for transport of goods by rail and/or water. Dalmeyer Road’s existing width and alignment is unsuitable for an intensification of HGV access and egress. A revised masterplan supplied with this representation provides separation between residential and the industrial uses on the Cygnus Business centre site.	Noted. Draft London Plan policy E7, part A states that Development Plans should encourage the intensification of industrial uses on all categories of industrial land. This includes Local Employment Sites. Given that Brent has been identified as a 'Provide Capacity' borough, and therefore has a substantial floorspace target, it will be necessary for all appropriate sites to be intensified. This site has an existing industrial use with filming being identified as an industrial process in the Use Classes Order, and is partly designated as LSIS. It therefore has the precedent of existing industrial/ employment uses. This has functioned effectively on the existing site and will therefore be capable of doing so going forward. Taking account of GLA representations on the Plan, the allocation of existing industrial land for other uses in Plans does not apply retrospectively, but is assumed to be considered as part of the Plan process subsequent to the adoption of the London Plan.	No Change.
5.5 South	BSSA1	Kelaty Properties LLP	Phasing and deliverability of Asiatic Carpets site. Combining Asiatic Carpets with the Cygnus Business Centre as a single allocation is inappropriate. Asiatic is in single ownership. It can be brought forward early within the plan period. Cygnus contains long-term tenancies of multiple occupiers. A flexible approach allowing delivery of Asiatic separately is supported. As a first phase, it ensures early housing delivery in the Church End Growth Area. Asiatic’s buildings are old, coming towards their end of life, reflecting the need for rationalisation of the business. Cygnus is modern and of adaptable size/ configuration for business requirements, thus not requiring early redevelopment.	The policy allows for the two sides of Dalmeyer Road to be considered together and ideally planned comprehensively together. Nevertheless, in terms of phasing it does identify the potential for Asiatic to come forward as a single entity in a first phase.	No Change.
5.5 South	BSSA1	Kelaty Properties LLP	Amount of dwellings identified: Welcome the allocation’s increased indicative capacity of 380 dwellings. This still fails to reflect the potential capacity. The site is within a Growth Area and will benefit from increases in PTAL related to the West London Orbital. Our masterplan provides and an indicative capacity of 450 homes; 80 bed care home; creative hub comprising flexible employment and SG uses, including film studios (11,200 sqm) and employment block with showroom on ground floor (4,500sqm; and 4 industrial blocks containing 11,100 sqm (on Cygnus Business Centre site). This doubles the total industrial floorspace. This takes account of 14 elements of LP policy D1B and is consistent with the draft Brent Local Plan and draft new London Plan. Paragraph 3.4.5 of the new London Plan states single aspect north facing flats should be	As set out in the Plan, the indicative capacity is just that and that it should neither be seen as a reason for justifying a scheme which is inconsistent with other policies, nor a limit on the potential capacity of a site where a well designed scheme that meets all policy objectives indicates that more development capacity can be achieved.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
			“avoided”. The illustrative site layout contains no north facing single aspect flats and provides acceptable separation distances. It is a feasible and reliable basis for any Local Plan capacity. It is considered that New draft London Plan (consolidated changes version July 2019) Policy D1B presents a risk of refusal if a scheme delivers above the current draft Brent Local Plan indicative capacity. As such the capacity should be changed to 450 homes.		
5.5 South	BSSA2	Thames water	Water: the scale of development is likely to require upgrades to the water supply network, and as such the developer and LBB should liaise with Thames Water at the earliest opportunity to agree a phasing plan. Failure to do so will increase the need for planning conditions being sought to control phasing. This should include a housing phasing plan stating what phasing may be necessary to ensure development does not outpace capacity improvement works. Waste: There should be no issues concerning wastewater capacity. The developer and LBB should still liaise with Thames Water at the earliest opportunity to advise on phasing.	Noted. Likely requirement of water infrastructure upgrades, and need to liaise at earliest opportunity with Thames Water to agree upon a housing and infrastructure phasing plan included within Infrastructure requirements.	No Change.
5.5 South	BSSA4	Legal & General	Proposed allocation welcomed in principle, but the following concerns: Indicative Residential Capacity. The indicative capacity of 200 dwellings equates to 64 dwellings per hectare based on the whole LSIS or 182 dwellings per hectare based on 35% of the site not being in industrial use. Such a low level risks non-efficient use of a brownfield site. A GLA Stage 1 Report for 18/3498 adjacent indicated 388 dwellings per hectare on that site was acceptable. A low indicative capacity creates risks at the planning application stage if a significantly higher number of dwellings is proposed. As such the indicative capacity should be increased to 300 dwellings. The allocation text should also state this is not be treated as a maximum.Supporting Community Facilities: No evidence of ‘need’ for community facilities has been provided taking into account other sites with capacity (which might be more appropriate) and any other facilities which are delivered in the future. The allocation needs to reflect this.	The capacity is only indicative at this stage. Application 18/3498, which was subject to extensive pre-app since 2016 and hence prior to the draft London Plan. Its deliverability is now less clear due to the need to better address industrial floorspace requirements and the relationships that it has with the adjacent lower residential adjacent properties. GLA policy have been clear about the need to address the borough's 'Provide Capacity' status as set out in the new London Plan. This sets a significant industrial floorspace target. In order to meet this target, and to comply with London Plan policy E7, designated industrial sites such as this will need to be intensified for industrial uses. This will put a limit on the amount of residential which can reasonably be achieved. Nevertheless, in the context of the existing application, 200 dwellings indicative does appear low, as such 300 is considered reasonable. The Plan already identifies that indicative dwelling numbers means just that and that the figure should neither prevent more dwellings if acceptable in all other policy respects, or justify a development that meets the target but is not policy compliant in other respects.Church End currently has a lack of community infrastructure. The appropriate locations for this will be outlined within the forthcoming masterplan. The site allocation includes this within its allocated uses so as to provide flexibility, and allow for its potential inclusion on this site, with the suitability of each area considered in relation to the need and making a proportionate contribution.	BSSA4 indicative capacity amend: " ~~200~~ <u>300</u> "BSSA4 timeframe for delivery amend: 5-10 years " <u>200</u> " 10+ years " ~~200~~ <u>100</u> ".
5.5 South	BSSA4	Legal & General	Supporting Community Facilities: No evidence of ‘need’ for community facilities has been provided taking into account other sites with capacity (which might be more	Church End currently has a lack of community infrastructure. The appropriate locations for this will be outlined within the forthcoming masterplan. The site allocation includes this	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
			appropriate) and any other facilities which are delivered in the future. The allocation needs to reflect this.	within its allocated uses so as to provide flexibility, and allow for its potential inclusion on this site, with the suitability of each area considered in relation to the need and making a proportionate contribution.	
5.5 South	BSSA5	Thames water	Water supply: No concerns in relation to this development. Developer and Local Planning Authority should liaise with Thames Water at the earliest opportunity to advise on the development's phasing. Waste: There should be no issues concerning wastewater capacity. The developer and LBB should still liaise with Thames Water at the earliest opportunity to advise on phasing.	Noted. See proposed changes.	Include reference within Infrastructure Requirements need to liaise at earliest opportunity with Thames Water to agree upon a housing and infrastructure phasing plan.
5.5 South	BSSA6	Wembley Towers Limited	Allocated non-residential uses should be identified as potential uses, subject to detailed feasibility and following consideration to need and demand (particularly in relation to the 'supporting community and cultural uses') at the time a development proposal is being formulated. To ensure the policy is effective Allocated Use should be revised to: "Residential, with potential for affordable workspace, supporting community and cultural uses and small-scale retail."	The suggested reference to allocated non-residential uses is considered appropriate. Until the extent of the development site that is available is known related to the flood assessment work, it is not clear of the potential to accommodate a range of uses associated with a mixed use community/ development.	No Change.
5.5 South	BSSA6	Wembley Towers Limited	The light industrial use is solely attached to Argenta House. The requirement for the re-provision of employment floorspace relates specifically to it and clarification is therefore required of this. The remainder does not have any land use restrictions. The allocated use refers to residential and affordable workspace uses. Affordable workspace provision (defined in Policy BE1 as minimum of 10% of total floorspace within major developments exceeding 3000 sqm) should only apply to Argenta House given it is a Local Employment Site. Given the potential for the site's regeneration, a mixture of appropriate uses should be included within the allocated use due to the need to activate the site and draw people through as a permeable route from Harrow Road to the station. Change text to "Part of the site contains a light industrial unit. Re-provision of affordable workspace within the part of the site occupied by Argenta House will be required to mitigate the loss of this unit".	In relation to the existing industrial use being related to Argenta House, this is true. Given the fact that both sites were effectively non-designated employment sites, the council considers it appropriate that on both sites, given the borough's provide capacity status that the allocation has the potential to accommodate employment floorspace in the form of affordable workspace as part of a mixed-use community. The mixture of uses suggested in the allocation is considered appropriate as part of the place-making linking between Harrow Road and the station if the flood work shows that development can be accommodated in the site.	BSSA6 Allocated Use amend: "Residential, <u>with potential for affordable workspace, supporting community and cultural uses and small scale retail</u> " BSSA6 Planning considerations amend: "The site <u>was until recently predominantly in employment use contains a light industrial units. Re-provision of affordable workspace will be required to mitigate the loss of this unit.</u> The London Plan identifies Brent as a 'provide capacity' borough in terms of industrial employment floorspace, <u>and as such provision of some affordable workspace will be sought on site as part of the potential uses associated with a new mixed use community. an increase in employment floorspace will be sought.</u> "

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.5 South	BSSA6	Wembley Towers Limited	The policy should be amended to indicate that provision of Build to Rent and Specialist Older People's Housing is encouraged on the site, subject to a detailed feasibility assessment, but not mandated. This clarification is necessary to ensure that the policy is sound and consistent with national policy. Amend to: "The site is of sufficient size to consider the incorporation of BH3 Build to Rent and BH8 Specialist Older People's Housing policy requirements, subject to a detailed feasibility assessment'.	Policy BH3 (Build to Rent) requires that schemes proposing over 500 dwellings have some element that comes forward as Build to rent unless the exceptions in the policy can be shown. Policy BH8 (Specialist Older Persons Housing) requires the provision of specialist older persons housing on sites delivering over 500 dwellings. Both policies with their supporting text set out sufficient flexibility to allow for site characteristics to be considered where such provision is not achievable.	No Change.
5.5 South	BSSA6	Wembley Towers Limited	The representation solely relates to Wembley Point, which has a prior approval for 439 dwellings permission for façade improvements and residential and office infill floorspace. The increase in indicative capacity is welcomed. It is recommended that the site allocation is clarified to confirm the indicative capacity of the site over the prior approval and 130 residential units for the Argenta House site. Detailed technical feasibility work is currently reviewing site constraints, including flood risk. The allocation considers that this area is suitable for tall buildings, subject to satisfactorily mitigating constraints, an opportunity exists to bring about enhanced place-making to significantly increase the capacity of the site.	The indicative capacity will be amended to incorporate the prior approval and the Argenta House application which planning committee was minded to approve in October 2019 subject to completion of a S106 obligation, with both totalling 569 dwellings. The further potential to accommodate development will be related to the extent of the site which can be shown through updated modelling agreed with the Environment Agency to be outside the functional floodplain. Until this has been done, the indicative capacity represents what is known that can be delivered.	BSSA6 Timeline for delivery amend: "0-5 years ~~440~~ 569, 5-10 Years ~~100~~ "
5.5 South Page 658	BSSA6	Wembley Towers Limited	Effective delivery of public realm enhancements will be influenced by the separate ownerships of the Argenta House and Wembley Point sites. The Planning Considerations should be modified to: "It has a poor public realm which needs to be improved, subject to agreement being reached between the Council and landowners."	On the public realm aspects, it is agreed that improvements will be subject to agreements being reached between the Council and landowners.	BSSA6 Planning Considerations amend: "It has a poor public realm which needs to be improved, <u>subject to agreement being reached between the Council and landowners.</u> "
5.5 South	BSSA6	Wembley Towers Limited	The requirement for a car free development to be subject to a Controlled Parking Zone (CPZ) being achieved is unnecessarily inflexible as this is beyond the control of the developer. It should reasonably be supported without an existing CPZ subject to local conditions and the relevant consideration of a Travel Plan and Transport Assessment. Amend to: "With a PTAL of 4/3, the site is located within a 6-minute walk of Stonebridge Park Station, which is served by the overground and underground and within a 5-minute walk of 3 bus stops, each serviced by one bus. Car free development will be encouraged, subject to a Controlled Parking Zone being achieved or, alternatively, in the context of local conditions and subject to relevant justification through the submission of a Travel Plan and Transport Assessment'.	Policy BT2 states that car free development will be encouraged where an existing CPZ is in place, or can be achieved. This is seen as sufficiently flexible so as to allow car free development on sites where a CPZ is yet to be delivered.	BSSA6 Planning considerations amend: "...Car free development will be encouraged, subject to a Controlled Parking Zone being ~~achieved~~ <u>achievable</u> ..."
5.5 South	BSSA6	Stonebridge Real Estate Development	The representation solely relates to Wembley Point, which has a prior approval for 439 dwellings permission for façade improvements and residential and office infill floorspace. The increase in indicative capacity is welcomed. It is recommended that the site allocation is clarified to confirm the indicative capacity of the site over the prior approval and 130 residential units for the Argenta	The indicative capacity will be amended to incorporate the prior approval and the Argenta House application which planning committee was minded to approve in October 2019 subject to completion of a S106 obligation, with both totalling 569 dwellings. The further potential to accommodate development will be related to the extent of the site which	BSSA6 Timeline for delivery amend: "0-5 years ~~440~~ 569, 5-10 Years ~~100~~ "

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
			House site. Detailed technical feasibility work is currently reviewing site constraints, including flood risk. The allocation considers that this area is suitable for tall buildings, subject to satisfactorily mitigating constraints, an opportunity exists to bring about enhanced place-making to significantly increase the capacity of the site.	can be shown through updated modelling agreed with the Environment Agency to be outside the functional floodplain. Until this has been done, the indicative capacity represents what is known that can be delivered.	
5.5 South	BSSA6	Stonebridge Real Estate Development	Allocated non-residential uses should be identified as potential uses, subject to detailed feasibility and following consideration to need and demand (particularly in relation to the ‘supporting community and cultural uses’) at the time a development proposal is being formulated. To ensure the policy is effective Allocated Use should be revised to: “Residential, with potential for affordable workspace, supporting community and cultural uses and small-scale retail.”	The suggested reference to allocated non-residential uses is considered appropriate. Until the extent of the development site that is available is known related to the flood assessment work, it is not clear of the potential to accommodate a range of uses associated with a mixed use community/ development.	No Change.
5.5 South	BSSA6	Stonebridge Real Estate Development	Effective delivery of public realm enhancements will be influenced by the separate ownerships of the Argenta House and Wembley Point sites. The Planning Considerations should be modified to: “It has a poor public realm which needs to be improved, subject to agreement being reached between the Council and landowners.”	On the public realm aspects, it is agreed that improvements will be subject to agreements being reached between the Council and landowners.	BSSA6 Planning Considerations amend: “It has a poor public realm which needs to be improved, <u>subject to agreement being reached between the Council and landowners.</u> ”
5.5 South	BSSA6	Stonebridge Real Estate Development	The light industrial use is solely attached to Argenta House. The requirement for the re-provision of employment floorspace relates specifically to it and clarification is therefore required of this. The remainder does not have any land use restrictions. The allocated use refers to residential and affordable workspace uses. Affordable workspace provision (defined in Policy BE1 as minimum of 10% of total floorspace within major developments exceeding 3000 sqm) should only apply to Argenta House given it is a Local Employment Site. Given the potential for the site’s regeneration, a mixture of appropriate uses should be included within the allocated use due to the need to activate the site and draw people through as a permeable route from Harrow Road to the station. Change text to “Part of the site contains a light industrial unit. Re-provision of affordable workspace within the part of the site occupied by Argenta House will be required to mitigate the loss of this unit”.	In relation to the existing industrial use being related to Argenta House, this is true. Given the fact that both sites were effectively non-designated employment sites, the council considers it appropriate that on both sites, given the borough’s provide capacity status that the allocation has the potential to accommodate employment floorspace in the form of affordable workspace as part of a mixed-use community. The mixture of uses suggested in the allocation is considered appropriate as part of the place-making linking between Harrow Road and the station if the flood work shows that development can be accommodated in the site.	BSSA6 Allocated Use amend: "Residential, <u>with potential for</u> affordable workspace, supporting community and cultural uses and small scale retail" BSSA6 Planning considerations amend: "The site <u>was until recently predominantly in employment use contains a light industrial units. Re-provision of affordable workspace will be required to mitigate the loss of this unit.</u> The London Plan identifies Brent as a ‘provide capacity’ borough in terms of industrial employment floorspace, <u>and as such provision of some affordable workspace will be sought on site as part of the potential uses associated with a new mixed use community. an increase in employment floorspace will be sought.</u>

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.5 South	BSSA6	Stonebridge Real Estate Development	The requirement for a car free development to be subject to a Controlled Parking Zone (CPZ) being achieved is unnecessarily inflexible as this is beyond the control of the developer. It should reasonably be supported without an existing CPZ subject to local conditions and the relevant consideration of a Travel Plan and Transport Assessment. Amend to: “With a PTAL of 4/3, the site is located within a 6-minute walk of Stonebridge Park Station, which is served by the overground and underground and within a 5-minute walk of 3 bus stops, each serviced by one bus. Car free development will be encouraged, subject to a Controlled Parking Zone being achieved or, alternatively, in the context of local conditions and subject to relevant justification through the submission of a Travel Plan and Transport Assessment’.	Policy BT2 states that car free development will be encouraged where an existing CPZ is in place, or can be achieved. This is seen as sufficiently flexible so as to allow car free development on sites where a CPZ is yet to be delivered.	BSSA6 Planning considerations amend: "...Car free development will be encouraged, subject to a Controlled Parking Zone being achieved <u>achievable</u> ..."
5.5 South	BSSA6	Stonebridge Real Estate Development	The policy should be amended to indicate that provision of Build to Rent and Specialist Older People’s Housing is encouraged on the site, subject to a detailed feasibility assessment, but not mandated. This clarification is necessary to ensure that the policy is sound and consistent with national policy. Amend to: “The site is of sufficient size to consider the incorporation of BH3 Build to Rent and BH8 Specialist Older People’s Housing policy requirements, subject to a detailed feasibility assessment’.	Policy BH3 (Build to Rent) requires that schemes proposing over 500 dwellings have some element that comes forward as Build to rent unless the exceptions in the policy can be shown. Policy BH8 (Specialist Older Persons Housing) requires the provision of specialist older persons housing on sites delivering over 500 dwellings. Both policies with their supporting text set out sufficient flexibility to allow for site characteristics to be considered where such provision is not achievable.	No Change.
5.5 South	BSSA7	Sports England	Welcomes new leisure centre allocation and reference to the need being identified within Brent’s Indoor Sports and Leisure Needs Assessment.	Support welcomed.	No Change.
5.5 South	BSSA7	Stonebridge Real Estate Development	The overall allocation of this site is strongly supported. The allocated uses should be identified as potential uses, subject to detailed feasibility and following consideration to need and demand (particularly in relation to the ‘small scale commercial and community uses’) at the time a development proposal is being formulated. Amend policy: ‘Allocated Use: New leisure centre, hotel, office, residential, and with potential for small scale commercial and community uses.’ The site’s acceptability for visitor accommodation is recognised by the Site Allocation which includes hotel use and is therefore consistent with Policy BE9.	Noted. The allocated uses the Council sees as appropriate given the extensive discussions regarding the site, and public consultation to date. If a proposal deviates from the desired uses, its relative merit will be assessed upon application. Given the scheme is to be delivered jointly with the Council as partner, it is expected that these uses will be included within any proposal.	No Change.
5.5 South	BSSA7	Stonebridge Real Estate Development	The indicative capacity should take account of detailed analysis undertaken to date, which could provide for up to 1,000 new homes.	The capacity is indicative only. If it can be robustly demonstrated that higher densities can be achieved without compromising on other desired development outcomes, it may be considered appropriate.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.5 South	BSSA7	Stonebridge Real Estate Development	The requirement for a car free development to be subject to a Controlled Parking Zone (CPZ) is unnecessarily inflexible. A CPZ can only be delivered by the Council. Car free or limited ('car-lite') parking development in a PTAL 4 area without a CPZ should reasonably be supported subject to local conditions and the relevant consideration of a Travel Plan and Transport Assessment. Amend policy to: "Car free development will be encouraged, subject to a Controlled Parking Zone being achieved or, alternatively, in the context of local conditions and subject to relevant justification through the submission of a Travel Plan and Transport Assessment."	Policy BT2 states that car free development will be encouraged where an existing CPZ is in place, or can be achieved. This is seen as sufficiently flexible so as to allow car free development on sites where a CPZ is yet to be delivered.	BSSA7 Planning considerations amend: "...Car free development will be encouraged, subject to a Controlled Parking Zone being achieved <u>achievable</u> ..."
5.5 South	BSSA7	Stonebridge Real Estate Development	For consistency, clarification is required in the allocation wording to state that the site falls within a Tall Building Zone (Policy BD2) and therefore is suitable for tall buildings. Amend Design Principles to: "In this context higher density development is appropriate and it is considered that this area is suitable for tall buildings, subject to being of high architectural quality, providing a high standard of amenity and respecting local character'.	Reference to the site being in a Tall Buildings Zone is appropriate.	BSSA7 Design Principles amend: "..... <u>The site has been identified as part of a Tall Buildings Zone.</u> In this context higher density development is appropriate and it is considered that this area is suitable for tall buildings, subject to being of high architectural quality, ~~and~~ providing a high standard of amenity <u>and respecting local character'</u>
5.5 South Page 661	BSSA7	Stonebridge Real Estate Development	The wording should be clarified to indicate that the provision of Build to Rent and Specialist Older People's Housing is encouraged on the site, subject to a detailed feasibility assessment, but not mandated. This clarification is necessary to ensure that the policy is sound and consistent with national policy. Amend planning considerations to: "Site is of sufficient size to consider the incorporation of BH3 Build to Rent and BH8 Specialist Older People's Housing policy requirements, subject to a detailed feasibility assessment'.	Policy BH3 (Build to Rent) requires that schemes proposing over 500 dwellings come forward as Build to rent. Policy BH8 (Specialist Older Persons Housing) requires the provision of specialist older persons housing on sites delivering over 500 dwellings. Both policies with their supporting text set out sufficient flexibility to allow for site characteristics to be considered where such provision is not achievable.	No Change.
5.5 South	BSSA7	GLA	The site currently has an operational breakers yard, an identified waste use. As such waste operations should be protected and if re-provided should be of equal size and operational capacity.	Noted. This site is not identified as being of strategic significance in the West London Waste Plan. The redevelopment of the site is seeking to maximise community benefit through the re-provision of a significantly larger leisure facility, plus a substantial amount of residential to meet Brent's housing needs. It has required the purchase of land-holdings by the council in order to create a comprehensive development. Taking this into account, it is not considered that it would be appropriate to re-provide the waste facility on site. Employment space to support small business development will be provided within the Bridge Park leisure facility.	No Change.
5.5 South	BSSA7	Thames water	Waste: The wastewater network capacity in this area may be unable to support demand, and requiring upgrades to drainage infrastructure. The developer should liaise with Thames Water to determine if a drainage strategy is necessary, stating where, when and how it will be delivered. This should be submitted with the application.	Noted. Likely requirement of wastewater infrastructure upgrades, and need to liaise at earliest opportunity with Thames Water to agree upon a housing and infrastructure phasing plan included within Infrastructure requirements. London Plan policy requirements on surface water drainage apply to all major developments. Flood risk issues are highlighted under planning considerations.	No change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.5 South	Blank South	Thersa	Noticed funding had been made available to the Jewish cemetery... could you do something to help St Mary’s, Neasden Lane, the Mediaeval Church (from where Church End gets its name) that has been there for over 1000 years. Sure they would appreciate it. It should be Brent's crowning glory, but it seems to be overlooked and ignored. More should be done to celebrate its history, beauty etc.	Noted. The Heritage Lottery Fund has been awarded to Brent to open up the Willesden Jewish Cemetery to the public. The Council does not have any plans for St. Mary's Church or is aware of other groups seeking funding. Should a group identify a potential project the council will consider this and the potential for supporting a bid for Heritage Lottery funding.	No change

5.6 SOUTH EAST

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.5 South & 5.6 South East	Para 5-5-13- BP6- 5-6- 12	Elana Gal-Edd	The rationale for Willesden Green High Road being identified as an intensification corridor was given as its large number of empty shops at one of the consultation events. There are actually few empty properties, but is a strong ethnic character catering for Middle Eastern, Polish, West Indian, Indian and Brazilian/Portuguese communities. It has historic landmarks such as Edward's Bakery. A local shopping area, it caters for daily needs and should stay. The former Case is Altered pub lost its unique historic name and pub sign, and the red brick building was allowed to be painted in black. Houses along Willesden High Road are attractive period terraces, much like those in the conservation area further east. It would be criminal to destroy these terraces and deprive the area of its character and heritage. As to the proposed height, firstly the High Road is too narrow to accommodate five storey building and secondly the terraces on the High Road back on to two storey terraces and would impinge upon them. Please reconsider the intensification plan and allow the area to develop organically.	Noted. The Brent Retail and Leisure Needs Assessment notes that Willesden has one of the highest vacancy rates of all Brent Town Centres. The majority of this is located to the west of the Town Centre. It was determined that in order to increase the vitality and viability of the Town Centre, that it should be rationalised, and consolidated into its more viable eastern centre. This is part of the rationale for the designation of the Intensification Corridors. These have also been identified due to road having an appropriately wide road width, good access to public transport and amenities etc.. The increased provision of homes will assist in meeting identified housing needs, and will support the local centre by increasing footfall. It does have a relatively strong ethnic food offer, however, the local centre of Harlesden has a more significant draw from this area in this regard. In corridors which have existing non-residential uses, as is the case here, the Council will look to retain the floorspace on this site if viable, or other appropriate non-residential uses as is aligned with the Plan. The majority of the area will remain untouched. In order to meet the significant housing targets set by the London Plan, and the presumption in favour of small site development, it was seen as necessary to direct housing toward appropriate locations. Many of these units have been inappropriately sub-divided, and represent poor living conditions for inhabitants. Redevelopment will help bring the homes up to standard in this respect. The resulting development will have to be of high quality design, and sympathetic to local character, ensuring local heritage is not compromised. At 15m, the road width is seen as sufficient to accommodate buildings up to 5 storeys. The same is true for the distance from the residential amenity to the rear. To allow development to come forward organically would not prepare positively for the growth required by regional and national policy. This would result in piecemeal development, coming forward without coherence and would lend itself to development in inappropriate, unsustainable locations.	No Change.
5.6 South East	BP6	Ravensale Limited	Criterion q) does not do enough to protect neighbouring residential properties. It needs to recognise only employment uses not harming neighbouring residential properties will be acceptable. It should refer to land on the west side of Hassop Road being suitable for B1 uses (including offices), as well as suitable B2 and B8 uses.	It is considered that the policy sufficiently identifies the need to address potential adverse impacts on neighbouring residential. The developments will be subject to other policies that seek to protect neighbours amenities, as well as considering the 'agent of change' for any new uses that might impact on future industrial occupiers. The reference to industrial as proposed in a modification to BP6 q) is consistent with policy and supports a wider range of uses which are likely to be more compatible with neighbours.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.6 South East	BP6	Sports England	BP6 seeks to protect and enhance playing pitches, however, NPPF paragraph 97 and Sports England policy require the protection of the playing 'field' which goes beyond the pitch. Therefore the wording should be amended to 'playing field'.	This is fair and as such the text shall be amended.	BP6 amend: "m) Enhance and protect playing <u>fields</u> ~~pitches~~ at Gladstone Park and....."
5.6 South East	BP6	TfL Commercial Development	Support identification of the South Kilburn Growth area as a Tall Building Zone where consistent with the South Kilburn Masterplan. This area includes BSESA34, a site adjacent to a transport hub with a high PTAL and should therefore be optimised.	Support welcomed. It should however be noted that existing heritage assets in close proximity to the station will limit the height that is appropriate on that site if it is redeveloped.	No Change.
5.6 South East	Para 5-6-24- 5-6-25	Robin Sharp	Understates the value and long-term sustainability of the Queen's Park area. Whilst housing costs are very high, this reflects that the type of housing and its density clustered around the Park (not the Salusbury Road facilities by the way) constitute a very acceptable form of living. An iconic photograph is of the Park with the bandstand should be featured in the Local Plan. The area is represented by a strong residents' association.2. There is no explanation of any plans for conservation areas except in relation to Mapesbury. Some clarification is needed.	Noted. See proposed changes.	Paragraph 5.6.11 amend: ".....The proposed extension to the Mapesbury, <u>Kensal Green, Queen's Park, Brondesbury, Kilburn, and Willesden Green</u> conservation areas, <u>plus potential new ones for Kensal Rise, Kilburn Lane and Malvern Road</u> ~~boundary to include parts of Cricklewood Town Centre~~ reflects the distinct and special character of these areas as outlined in the Brent Heritage Study....."
5.6 South East Page 664	Para 5-6-24- 5-6-25	Robin Sharp	1. Queen's Park Creative Quarter is in Lonsdale Road (NOT Avenue). Cannot see this mapped.	Noted. See proposed change. The Creative Quarters are featured on the policies map. The Place maps provide a broad overview of the spatial designations within each Place. Given their limited size, and the overlapping nature of spatial designations, it would not be appropriate to include other designations as it would reduce its clarity.	Paragraph 5.6.5 amend: "Lonsdale ~~Avenue~~ <u>Road</u> "
5.6 South East	Para 5-6-24- 5-6-25	Robin Sharp	3. 5.6.24 refers to a lack of orbital links but seems to ignore the North London Line (Richmond to Stratford). This should be heralded.	Noted. See proposed change.	Paragraph 5.6.8 amend: "The London Overground travels through this place <u>providing an orbital route</u> linking Richmond/Clapham Junction and Stratford,....."
5.6 South East	Para 5-6-24- 5-6-25	Robin Sharp	4. 5.6.25 refers to reducing car dominance on the A5 but for air quality and climate change reasons. Car commuting needs reduction on all the routes mentioned and care taken to avoid displacement. 5. References to trees planting improving air quality are misplaced. Brent Breathes explains they don't, though they are good for carbon capture, wildlife and a desirable public realm.	Paragraph 5.6.25 notes that the heavy traffic on the A5 creates an unattractive environment for residents and businesses, as well as stating the benefits of improving the public domain for air quality purposes. The paragraph makes particular reference to the A5 due to its significance and particular traffic problems. The Council's strategy, as outlined in policies BT1 and BT2 is to reduce reliance on personal vehicles and increase the use of more sustainable transport modes. This will benefit all roads within Brent. Trees provide an important role in the filtration of particulate matter from the air. Although street trees alone are not sufficient so as to solve air quality problems, they will help. They will also improve the public realm, helping to increase active travel uptake and reduce car dependence, which itself will assist in the improvement of air quality.	No Change.

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5.6 South East	Para 5-6-24- 5-6-25	Robin Sharp	6. Plan assumes too readily great success of South Kilburn redevelopment. Densities are too high and green space insufficient – not Brent’s fault but of HM Treasury withdrawing subsidy from new social housing.	The South Kilburn estate regeneration programme is in mid-phase delivery. The majority of residents voted in favour of its continued regeneration at the end of 2019 due to the successes of already developed plots. The scheme will help regenerate the area whilst delivering essential housing, including affordable housing. This will help us achieve the ambitious London Plan housing target, which requires the efficient use of land in the delivery of homes, resulting in the high density development of brownfield land. If these sites were not effectively utilised, capacity would have to be met elsewhere, such as on open space land which is not desirable, nor in line with London Plan policy. Green space in the area is being reprovided with increased utility, along with a number of pocket parks.	No Change.
5.6 South East	BSESA1	Thames water	Water: the scale of development is likely to require upgrades to the water supply network, and as such the developer and LBB should liaise with Thames Water at the earliest opportunity to agree a phasing plan. Failure to do so will increase the need for planning conditions being sought to control phasing. This should include a housing phasing plan stating what phasing may be necessary to ensure development does not outpace capacity improvement works. Waste: The wastewater network capacity in this area may be unable to support demand, and requiring upgrades to drainage infrastructure. The developer should liaise with Thames Water to determine if a drainage strategy is necessary, stating where, when and how it will be delivered. This should be submitted with the application.	Noted. Likely requirement of Water and wastewater infrastructure upgrades, and need to liaise at earliest opportunity with Thames Water to agree upon a housing and infrastructure phasing plan included within Infrastructure requirements. London Plan policy requirements on surface water drainage apply to all major developments. The need to address flooding concerns is stated within the Planning Considerations section.	No Change.
5.6 South East	BSESA3	Thames water	Water supply: No concerns in relation to this development. Developer and Local Planning Authority should liaise with Thames Water at the earliest opportunity to advise on the development's phasing. Waste water: Network capacity may be unable to support anticipated demand from this development. Local upgrades may be required to ensure sufficient capacity ahead of development. Where there is a potential capacity constraint, developer liaison will be needed to determine whether a detailed drainage strategy identifying what infrastructure, where, when and how it will be delivered is required. If so, this will need to be submitted with the planning application.	Noted. This is set out in the infrastructure requirements.	No Change.
5.6 South East	BSESA5	Thames water	Water supply: No concerns in relation to this development. Developer and Local Planning Authority should liaise with Thames Water at the earliest opportunity to advise on the development's phasing. Waste water: Network capacity may be unable to support anticipated demand from this development. Local upgrades may be required to ensure sufficient capacity ahead of development. Where there is a potential capacity constraint, developer liaison will be needed to determine whether a detailed drainage strategy identifying what infrastructure, where, when and how it will be delivered is required. If so, this will need to be submitted with the planning application.	Noted. This is set out in the infrastructure requirements.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.6 South East	BSESA7	Thames water	Water supply: No concerns in relation to this development. Developer and Local Planning Authority should liaise with Thames Water at the earliest opportunity to advise on the development's phasing. Waste water: Network capacity may be unable to support anticipated demand from this development. Local upgrades may be required to ensure sufficient capacity ahead of development. Where there is a potential capacity constraint, developer liaison will be needed to determine whether a detailed drainage strategy identifying what infrastructure, where, when and how it will be delivered is required. If so, this will need to be submitted with the planning application.	Noted. This is set out in the infrastructure requirements.	No Change.
5.6 South East	BSESA9	Sports England	To ensure compliance with NPPF the on-site MUGA should be retained, but preferably enhanced. This was iterated at Reg 18 stage, and the Consultation statement agreed this would be included, with reference to a community access agreement. This should be followed through as previously stated in the planning consideration section follows: " The existing MUGA supplied at the Kilburn Park Junior School site will need to be provided. A community use agreement will be required to allow community access to this and other facilities within the school such as halls where it would not be unreasonable to assume that these facilities could be designed with wider community use in mind."	Noted. The text referred to has been included within SSA BSESA12 which is where the existing school facilities are to be re-provided. This is the appropriate location for this text.	No Change.
5.6 South East	BSESA10	Thames water	Water: the scale of development is likely to require upgrades to the water supply network, and as such the developer and LBB should liaise with Thames Water at the earliest opportunity to agree a phasing plan. Failure to do so will increase the need for planning conditions being sought to control phasing. This should include a housing phasing plan stating what phasing may be necessary to ensure development does not outpace capacity improvement works. Waste: The wastewater network capacity in this area may be unable to support demand, and requiring upgrades to drainage infrastructure. The developer should liaise with Thames Water to determine if a drainage strategy is necessary, stating where, when and how it will be delivered. This should be submitted with the application.	Noted. This is already set out appropriately in the site's infrastructure requirements.	No Change.
5.6 South East	BSESA12	GLA	Site allocation boundary does not follow existing built form pattern. If intentional, this should be made clear. Brent's Open Space Assessment identifies Kilburn and adjacent Queens Park wards as being deficient in access to a nearby park in. This site is part of a series of land swaps. There is no evidence to support allocation BSESA9 stating that there will be no resulting overall loss of open space. The reconfiguration does not address the overall deficiency to access to nearby parks.	The South Kilburn Growth Area is subject to an existing masterplan, which is reflective of the site allocation boundaries. The existing development ignored the historic street pattern, which is something the new allocations seek to replace. The masterplan sought to maximise the utility of the land. The phasing of the masterplan will allow for such development to come forward sustainably. Existing residents will be decanted as necessary in appropriate temporary accommodation. The land swap will result in a more suitable park, or a better size, with better overlooking, amenity and facilities in a better location, which will be more heavily utilised. Due to competing pressures on the limited available land, including the need to accommodate 50% dwellings at social rents it was not possible to increase the quantum of	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
				park land in this area. The masterplan area will include other open space typologies, including pocket parks. This is seen to bring the area broadly in line with the London Plan. The Masterplan for the area is in its mid phases. This was voted on by our residents in late 2019 receiving considerable support. It will not be possible to re-orient the plans for the site so as to bring the park up to standards at this stage.	
5.6 South East	BSESA12	Thames water	Water: Information provided does not enable us to make a detailed assessment of potential impact. To do this we will need specific detail on the Council's aspirations for the site. This should include the location, type and scale of development on this site. Waste: The wastewater network capacity in this area may be unable to support demand, and requiring upgrades to drainage infrastructure. The developer should liaise with Thames Water to determine if a drainage strategy is necessary, stating where, when and how it will be delivered. This should be submitted with the application.	Noted. The site requires investment in community uses, including a school, nursery and community space. This will determine and limit the extent of residential provided on site. This is not anticipated to be significant. The need to liaise with Thames Water at an early stage is included within the Infrastructure Requirements. . For consistency's sake, the wording can be amended to that found within other site allocations on this matter. London Plan policy requirements on surface water drainage apply to all major developments.	BSESA12 Infrastructure requirements a mend: “...Thames Water will need to be engaged to ~~establish impact on water supply network and watertreatment infrastructure at the earliest~~ <u>opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered ahead of development prior to the development creating identified additional capacity requirements...</u> ”
5.6 South East	BSESA14	Thames water	Water: the scale of development is likely to require upgrades to the water supply network, and as such the developer and LBB should liaise with Thames Water at the earliest opportunity to agree a phasing plan. Failure to do so will increase the need for planning conditions being sought to control phasing. This should include a housing phasing plan stating what phasing may be necessary to ensure development does not outpace capacity improvement works. Waste: The wastewater network capacity in this area may be unable to support demand, and requiring upgrades to drainage infrastructure. The developer should liaise with Thames Water to determine if a drainage strategy is necessary, stating where, when and how it will be delivered. This should be submitted with the application.	Noted. This matter is sufficiently addressed in infrastructure requirements.	No Change.
5.6 South East	BSESA16	Thames water	Water: Information provided does not enable us to make a detailed assessment of potential impact. To do this we will need specific detail on the Council's aspirations for the site. This should include the location, type and scale of development on this site. Waste: The wastewater network capacity in this area may be unable to support demand, and requiring upgrades to drainage infrastructure. The developer should liaise with Thames Water to determine if a drainage strategy is necessary, stating where, when and how it will be delivered. This should be submitted with the application.	Noted. See proposed changes. The site requires investment in community uses. This will determine and limit the extent of residential provided on site. This is not anticipated to be significant. London Plan policy requirements on surface water drainage apply to all major developments.	BSESA16 Infrastructure Requirements amend: “..Thames Water has indicated the scale of <u>development could require upgrades to water supply capacity and is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</u> ”

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.6 South East	BSESA18	Ravensale Limited	The draft policy under-estimates the site’s potential to provide high density development; placing unnecessary restrictions that conflict with the NPPF and draft London Plan’s requirement for intensification in highly sustainable locations. It also encourages a full range of industrial uses (e.g. B1c, B2 and B8) that will not improve the area’s environmental quality, nor amenity impacts on adjoining residential properties (purported to be a key objective of Policy BSESA18 and Policy BP6). The site owner’s initial investigations potential to accommodate over 100 dwelling (possibly up to 200). The timescale of which is likely to be sooner than specified in the policy, with 50% in the first 5 years and the remainder in the next 5. The policy erroneously refers to ‘Policy B6(p)’, when it should be referring to ‘Policy BP6(q)’. Policy BSESA18’s is far more onerous than that of Policy BP6 (the latter merely supports removal of vehicle workshops on Hassop Road, whereas the former specifically requires their removal). In addition, B1a (offices) should be encouraged given the site’s close proximity to nearby residential properties and given the policy’s desire to “improve amenity for neighbouring residential units”. Design Principles: The policy should go further in promoting suitably designed taller building heights in this highly sustainable town centre location. Justification: The range of uses deemed acceptable on the site should be expanded to: “...including housing and/or other forms of residential accommodation would help support the vitality of the town centre and meet a local housing need.”	The identified capacity is indicative only. It also reflects the town centre location of the site where a multiplicity of uses could be achieved as part of a mixed use scheme. If the upper floors were to be wholly residential then it is agreed that the indicative capacity could be larger. Pre-application discussions however have featured a mix of uses, with a scale out of context to that which the Council is comfortable with. Thus the indicative target is seen as appropriate. If it can be shown, through a design-led approach, that higher densities can be achieved in accordance with the policies with this Plan, the London Plan and the NPPF, then there is sufficient flexibility in the policy to allow this to occur. The Council will require greater justification to identify delivery within the first 5 years, consistent with that sought in NPPF and the NPPG. Else there is a risk to the Council if identified in a delivery target for the purposes of monitoring the Local Plan that the Council is over-ambitious, with consequent issues of not being able to identify a 5 year supply of available sites. Brent has been identified within the London Plan as a 'Provide Capacity' borough and has been set significant industrial floorspace targets accordingly. Policy E7 of the London Plan in this context does not support the release of industrial sites and policy BE3 sets out tests for Local Employment Sites. The allocation includes vehicle repair garages and other industrial premises on Hassops Road. In order to meet the targets industrial/ employment floorspace will at the very least need to be retained, and ideally intensified. In order to come forward sustainably this will have to be in accordance with DMP1 and other associated policies with regards to its impact on surrounding existing/ proposed uses. The requirements within BSESA18 require the re-provision/intensification of employment uses which are appropriate to co-locate alongside residential, so as to improve amenity upon existing, as does part q) of policy BP6. Given its surrounding context, including conservation area, the heights identified in the policy are regarded as appropriate. B1 office will be appropriate on the allocation, except if this is at the expense of industrial floorspace, as this would be inconsistent with Brent's provide capacity status.	Policy B6 amend" "q) The conversion of vehicle repair premises on Hassop Road to ~~employment~~ <u>industrial</u> uses which improve amenity for neighbouring residential units will be supported....." Policy BSESA18 planning considerations amend: "Policy B6 (~~p~~q) promotes the conversion of premises on Hassop Road to ~~employment~~ <u>industrial</u> uses which improve amenity for neighbouring residential ~~units~~ <u>properties</u>."

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.6 South East	BSESA18	Thames water	Water supply: No concerns in relation to this development. Developer and Local Planning Authority should liaise with Thames Water at the earliest opportunity to advise on the development's phasing. Waste water: Network capacity may be unable to support anticipated demand from this development. Local upgrades may be required to ensure sufficient capacity ahead of development. Where there is a potential capacity constraint, developer liaison will be needed to determine whether a detailed drainage strategy identifying what infrastructure, where, when and how it will be delivered is required. If so, this will need to be submitted with the planning application.	Noted. See proposed changes. London Plan policy requirements on surface water drainage apply to all major developments.	BSESA16 Infrastructure Requirements amend: <u>"Thames Water has indicated the scale of development could require upgrades to water supply capacity and is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."</u>
5.6 South East	BSESA19	Theatres Trust	Support site allocation. Design Principles needs amending to requiring Theatres Trust to be engaged. Consistency of approach with the position for site BNSA4, where the views of Historic England and the Cinema Theatre Association should be reflected.	Noted. The requirement for the Theatres Trust to be engaged at an early stage has been included within the Planning Considerations section. This is seen as appropriate and sufficient.	No Change.
5.6 South East	BSESA34	TfL Commercial Development	Support for allocated uses of station, commercial and residential. Reps given in reg 18 requested a higher indicative capacity than 12 which the Council responded saying in the absence of a capacity study supported by a heritage statement, 12 units is considered appropriate and will therefore not be changed. However, the capacity now states unknown. Therefore the Consultation Statement and Reg 19 document are inconsistent and indicative capacity for the site unclear. We request the word unknown is removed and the site allocated for higher density development to be determined in regards to its context, in line with DNLP policy D1B.	The capacity will amended to 20. This is on the basis of 3 storeys above with some development to the rear with all dwellings dual aspect. This would represent 210 dwellings per hectare, which is a reasonable assumption given the adjacent heritage assets. As indicated elsewhere, it should neither be seen as a ceiling, nor a minimum if good design/ policy requirements indicate more/less can be provided on site.	BSESA34 Indicative Homes amend: <u>"Unknown 20"</u>
5.6 South East	Blank South East	Andrea Diez	Empty properties should be demolished and redeveloped. This is especially required in Willesden Green, Queens Park, Brondesbury Park, South Kilburn and Kensal Green.	Noted. Vacant buildings are likely the result of its current designated use being unviable, or a result of its general aesthetic quality. These units are likely situated within peripheral town centre sites. Policy BE5 notes that the conversion into community, office or residential uses will be supported in this instance. The Plan has also allocated sites for development. A number of these have been on the grounds of low occupancy or vacancy.	No Change.
5.6 South East	Blank South East	Elana Gal-Edd	Chaplin Road, Villiers Road , Deacon Road northwest of Belton Road and the north-western section of Chapter Road have been placed in the south plan as part of Church End Ward. They belong to Willesden Green Ward and should therefore be in the South East plan.	Noted. The Places have not been determined by ward boundaries, although in part they may follow them. They have been determined by a variety of factors, principally town centre catchments and other aspects of general character. The Places assist in helping manage the development of the borough. The Borough will still be considered as a whole. This is supported by London Plan policy, aligning with Good Growth Policy GG1 which seeks to build strong and inclusive communities through the setting of policies that respond to local circumstance.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.6 South East	Blank South East	David Walton	South Kilburn Open Space is a large green space which provides the only significant piece of green space within South Kilburn, one of the most diverse and densely populated areas in the UK, coming in the top 10% deprived areas also. Retention of land will enable almost all residents within South Kilburn to be ~400m from a large (2ha) green space as is Council policy, bringing with it multi-faceted benefits for the community. Space should be designated as Local Green Space as can be achieved by Local support via the NPPF, a feat that has only been achieved by the residents of Sudbury in identifying Vale Farm. The space meets NPPF criteria in that it is: in close proximity to the community it serves; demonstrably special to the community on the grounds of beauty, historic significance, recreational value, tranquillity, richness of wildlife, pollution control, sustainable flood prevention due to woodland, fire assembly point, and makes up for otherwise deficient area; and is local in character (not an extensive tract of land). It is in light of recent open space development of the Granville Road Public Open Space, and the proposed development plans for the Cathedral Walk linear park, which i make these comments. The park should be protected from such inappropriate development. DNLP policy G4 also supports this.	Noted. The newly revised South Kilburn Supplementary Planning Document provides the framework for development within the South Kilburn Growth Area. In accordance with the document, the Local Plan, under paragraph 5.6.29 states that there will be no net loss of open space. Policy BSEGA1 goes further and states that South Kilburn Park will be extended and enhanced. The scheme will involve the relocation of the Kilburn Park School Foundation to the East into allocation BSESA12. The school (BSESA9) will be converted back into open space, resulting in no net loss. This will create a more regular shaped park, which can be better utilised, feel more secure, and have a higher profile in the public's consciousness. The site will then be reinstated as Open Space in line with the existing park and will therefore be protected from development under London Plan policy G4. In addition to this, under policy BSEGA1, additional public open space will be provided on proposed/ existing developments, with some coming forward to replace that which has been developed, such as the Granville Road open space. Until these processes have been completed, it is not considered appropriate to designate this space as Local Green Space in the Local Plan as it will introduce additional potentially restrictive policy tests to areas that have been identified as being subject to extensive change.	No Change.

5.7 SOUTH WEST

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.7 South West	Para 5-7-11	Sudbury Town Residents Association	Clarification that the night-time economy of Sudbury Town has been created by incorrect licensing of betting shops and 24-hour retail liquor licenses and 24- hour fast food outlets, creating an unpleasant and anti-social environment. These are contrary to the Sudbury Town Neighbourhood Plan. A commitment to remove the inappropriate licensing and encourage sustainable Ground Floor Space use in the High Street in line with Sudbury Town Neighbourhood Policies TCU1 and TCD1.	▲The licensing of betting shops, 24 hour liquor licences and 24 hour fast food outlets is not a material planning consideration. Policy BE5 seeks to restrict the proliferation of betting shops, adult gaming centres, pawnbrokers, take-aways, and shisha cafes. Night-time economy refers to all economic activity taking place between 6pm and 6am. The night time economy will be supported across the borough in accordance with draft London Plan policy HC6. Sudbury will not however be prioritised for this, with delivery being pushed toward the town centres of Wembley, Kilburn, Cricklewood and Wembley Park.	No Change.
5.7 South West	Para 5-7-11	John Cox	Paragraph 5.7.11 should be “Sudbury & Harrow Road station”.	Amend name of station.	Paragraph 5.7.11 amend: '....Sudbury & Harrow <u>Road</u> rail station.....'.
5.7 South West	BP7	Woolbro Homes	Woolbro supports the part of policy BP7. Woolbro challenge part ‘e – homes’. Here, in relation to the Alperton Growth Area, the policy states: “Where alternative uses are co-located on industrial sites this will be as part of a comprehensive regeneration scheme which ensures no net loss of industrial floorspace.” For the reasons set out above to site specific allocation BSWA6, Woolbro consider reference to ‘no net loss’ should be amended on the basis that it does not appear to be justified in terms of meeting wider existing stated development goals in this Housing Growth Zone. Suggested change: “ e) ... regeneration scheme which ensures no net loss re-provision of industrial within the ground floors of the new buildings.”	Support noted. The new draft London plan identifies Brent as a 'provide industrial capacity' borough. Boroughs in the 'provide capacity' category are where strategic demand for industrial, logistics and related uses is anticipated to be strongest, and are required to seek to deliver intensified floorspace capacity in either existing or new locations accessible. Given this, the Council maintains that there should be no net loss of industrial floorspace and considers that this is not incompatible with other housing priorities (specifically, housing provision due to being a Housing Zone).	No Change.
5.7 South West	BP7	St. George	Proposed modification: CHARACTER, HERITAGE AND DESIGN (b) Respecting the low-rise character of the Sudbury and Wembley suburban residential areas, through focussing tall buildings (as defined in Policy BD2) in the Growth Areas of Wembley and Alperton. and Elsewhere in the intensification corridors of A404 Harrow Road and A4005 Bridgewater Road/ Ealing Road, A4089 Ealing Road, A404 Watford Road tall buildings where around 15 metres (5-storeys) could be appropriate and. In Sudbury and Ealing Road town centres where buildings around 15-18 metres (5-6 storeys) could be appropriate. Reasoning: The policy drafting is ambiguous and could be read to suggest that only 5 storeys would be acceptable in the Alperton Growth Area. The Council has approved a range of tall buildings at Grand Union (up to 25 storeys). Supported by the Brent Tall Building Strategy 2019: “The majority of Brent is low rise, with taller buildings in key locations including Wembley, Alperton and South Kilburn.” Alperton is part of the top five “largest cluster of existing and permitted tall buildings over 30m.”	Agreed, the heights noted in paragraph b) refer to potential heights within the intensification corridors mentioned, and not the Alperton and Wembley Growth Areas' Tall Buildings Zones. With regard to labelling the potential building heights in intensification corridors as tall buildings, the policy recognises the need for intensification and ensuring that tall buildings are focussed in specific areas in order to respect the low-rise character of Sudbury and Wembley. Wembley and Alperton both have designated tall building zones. As the Tall Building Strategy notes, what is considered to be a tall building is dependent on local context. As such, the council does not consider it justified or necessary to classify potential buildings within the intensification corridors as being tall or not.	BP7 Criterion b) amend: "Respecting the low-rise character of the Sudbury and Wembley suburban residential areas, through focussing tall buildings (as defined in Policy BD2) in the Growth Areas of Wembley and Alperton <u>and in intensification corridors.</u> ~~and~~ In the intensification corridors of A404 Harrow Road and A4005 Bridgewater Road/ Ealing Road, A4089 Ealing Road, A404 Watford Road <u>buildings</u> ~~where~~ around 15 metres (5-storeys) could be appropriate and in Sudbury and Ealing Road town centres where <u>buildings</u> around 15-18 metres (5-6 storeys) could be appropriate."

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.7 South West	BP7	Sudbury Town Residents Association	Policy BP7 • CHARACTER, HERITAGE AND DESIGN states:b) Respecting the low-rise character of the Sudbury and Wembley suburban residential areas, through focussing tall buildings (as defined in Policy BD2) in the Growth Areas of Wembley and Alperton and elsewhere in the intensification corridors of A404 Harrow Road and A4005 Bridgewater Road/ Ealing Road, A4089 Ealing Road, A404 Watford Road where around 15 metres (5-storeys) could be appropriate and Sudbury and Ealing Road town centres where around 15-18 metres (5-6 storeys) could be appropriate. comment: This part of the Policy is confusing and contradictory. Sudbury Town Neighbourhood Plan page 46 clearly states that development should not be greater than 2-3 storeys high to retain the low-rise character of Sudbury Town. This includes the High Street. The Council has ignored STRA and our Neighbourhood Forum Petition signed by 517 persons, who objected to Intensification Corridors along the Harrow Road, Watford Road and Bridgewater Road in January 2019. The Council has continued to propose this for the Sudbury Town area against the vote of the those that live and work within the Neighbourhood Forum Area. • COMMUNITY AND CULTURAL FACILITIESn) Improvement and enhancement of the Vale Farm and its Sports CentreThis statement undermines the Sudbury Town Neighbourhood Plan Policy VF1: Improvements to Vale Farm should not result in the loss of green or open space. Change of use and development other than for uses which support recreation, sporting and amenity use will not be permitted at Vale Farm.comment: Therefore, there should be no development on Vale Farm other than for the purpose of improvement of sports facilities. Brent has the highest obesity in the UK and the Neighbourhood Plan wants to protect this land from development to encourage our children to lead healthy and active lives. • South West 5.7.15 states: Outside these regeneration areas building height will be more reflective of the local context. Town centres (around 18 metres 6 storeys) and intensification corridors (around 15 metres/ 5 storeys) will provide the opportunity for some additional height. Elsewhere development will be expected to come forward at levels not significantly higher than existing two and three storey developments. comment: Sudbury Town is not a Town Centre but a Local Centre, therefore this does not apply. The Council have ignored the Sudbury Town Neighbourhood Plan guideline on page 46: proposals for any new development be in the order of two to three storeys high.	The Council has had to prioritise areas for development to meet housing needs as required by the national policy and the London Plan. Sudbury has very good public transport accessibility, particularly around the town centre, whilst accessibility along the proposed intensification corridors is also good. Although most is two-three storey the area has taller buildings in parts and very limited designated heritage assets. Although it is subject to a neighbourhood plan, the Sudbury plan contains no policies on heights of buildings or character. In the context of the contents of the emerging London Plan, which identifies that there is an expectation that character in some areas should be subject to change to accommodate growth, there are limited impediments to it being identified as a priority area for intensification. Nevertheless, it is considered that the policies in the emerging Plan seek <u>to</u> limit impact on the character of the majority of Sudbury, whilst for some parts it is anticipated that the character will change. In the context of how the borough has to accommodate the population's growth, this is considered an appropriate response.	No Change.
5.7 South West	BP7	Sudbury Town Residents Association	Removal of any reference to development of Vale Farm to be compliant with the Sudbury Town Neighbourhood Plan Policy VF1. Brent has the highest obesity levels in the UK and we need to save our sports land and encourage people to lead healthy and active lives.	Vale Farm: The draft Local Plan recognises the opportunities for improvement and enhancement of Vale Farm Sports Centre (Policy BP7 (n)) for sports and leisure uses. The Council also supports STRA's ambition for improvements and recognises in the Local Plan that it will explore all options of how this can be achieved within the financial parameters available to it (5.7.25). The open space at Vale Farm is identified as a Local Green Space.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
				This designation is equivalent to Green Belt in national policy in terms of its level of protection (5.7.26).	
5.7 South West	BP7	TfL Commercial Development	TfL CD supports the provision of high-density development within both the Wembley and Alperton Growth Areas, especially in locations close to transport infrastructure and within town centres in Policy BP7. • TfL CD remains of the view that a limit of five to six storeys for town centre development under Policy BP7 Part (b) is unnecessarily restrictive. The suggested height would not support the optimal development of sites in this area. • Reasoning: o TFL considers the response to the consultation statement as a failure to acknowledge the site as a prime location for development as it does not consider its local infrastructure capacity, existing and planned connectivity and accessibility of the area. (Statement: "The suggested height is considered appropriate when taking account of the existing character and sub-urban nature of the area"). o The policy conflicts with Draft London Plan Policy D6, which supports a case-by-case approach to determining optimal development densities, depending on location specific criteria including local context, local infrastructure capacity, and existing and planned connectivity and accessibility. o BP7 South West, Homes, Part (e) includes reference to the suitability of areas well-served by public transport to support higher density development and an increase in housing provision to make the most efficient use of land resources. This would align with Draft London Plan Policy H1 and NPPF Chapter 11 making effective use of land. • Suggestion: It is suggested that the threshold be removed and the wording made more flexible to ensure appropriate height and density, determined on a case-by-case basis.	Policy BP7 (b) : Tall building study identifies around 5-6 storeys appropriate for Sudbury and Ealing Road Town centres. This takes into account the low-rise character of the area. Tall buildings will be focussed in Growth Areas as defined in Policy BD2. BD2 policy does however identify strategic locations in town centres being appropriate for taller buildings. Part (e) of the Policy specifically refers to co-location in on industrial and employment land in Alperton Growth Area, prioritising areas within the Growth Area that are well-served by public transport. London Plan Policy D6 Optimising Density has been moved and combined with D1A and D1B. Policy D1B encourages development that responds to a site's context, and for developments to enhance local context that positively respond to local distinctiveness with due regard to existing and emerging street proportions. The Council has identified many areas as appropriate for tall buildings. It is not considered that it has been overly restrictive and policy justifications in for example BD2 recognise exceptions may be made that allow for tall buildings not within identified tall buildings zones.	No Change.
5.7 South West	BSWGA1	Woolbro Homes	Support the policy.	Support welcomed.	No Change.
5.7 South West	BSWGA1	St. George	Proposed modification: Alperton Growth Area's transformation as an extensive area of mixed use residential led regeneration principally focussed along the Grand Union canal will continue between Alperton and Stonebridge Park stations including the former Northfields Industrial Estate. The area will be a location for taller buildings at its Ealing Road and Northfields ends, with principally mid-rise in between. Reasoning: Policy BP7 seeks to focus "tall buildings" (as defined in Policy BD2) in the Growth Areas of Wembley and Alperton. Site Allocation BSWA7- Northfields ("Grand Union") comprises a fundamental part of the Growth Area. Grand Union is subject to planning permission ref. 18/0321, as amended by application 19/2732, which permits a range of tall buildings up to 25 storeys. To be effective, Policy BSWGA1 should be revised to specifically refer to Northfields and make reference to tall, not taller buildings. Evidence Base: The Brent Tall Building Strategy 2019 acknowledges that "The majority of Brent is low rise, with taller buildings in key locations including Wembley, Alperton and South Kilburn." Alperton is part of the top five "largest cluster of existing and permitted tall buildings over 30m." Policy BP7 focus tall buildings in this Growth Area.	It is not considered necessary to emphasise the inclusion of any particular site allocation between Alperton and Stonebridge Park stations - there are a number of site allocations within this area and all contribute towards the transformation of the growth area. Accept that the reference to "tall" is appropriate.	BSWGA1 amend: "...The area will be a location for taller buildings at its Ealing Road and Northfields ends, with principally mid-rise in between....."

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.7 South West	BSWSA1	Thames water	Wastewater network unable to support capacity. Local upgrades required to existing drainage ahead of development. Developer to liaise with Thames Water for detailed drainage strategy.	Planning considerations takes into account Thames Water comments from previous consultation. For consistency with other policies this shall be moved to infrastructure requirements .	Planning considerations amend: ~~“Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.”~~ Infrastructure requirements amend: “ <u>Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.”</u>
5.7 South West	BSWSA2	Thames water	Wastewater network unable to support capacity. Local upgrades required to existing drainage ahead of development. Developer to liaise with Thames Water for detailed drainage strategy.	Planning considerations takes into account Thames Water comments from previous consultation. For consistency with other policies this shall be moved to infrastructure requirements.	Planning considerations amend: ~~“Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.”~~ Infrastructure requirements amend: “ <u>Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the</u>

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
					<u>development creating identified additional capacity requirements."</u>
5.7 South West	BSWSA3	Thames water	Wastewater network unable to support capacity. Local upgrades required to existing drainage ahead of development. Developer to liaise with Thames Water for detailed drainage strategy.	Planning considerations takes into account Thames Water comments from previous consultation. For consistency with other policies this shall be moved to infrastructure requirements.	Planning considerations amend: ~~"Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."~~ Infrastructure requirements amend: " <u>Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."</u>

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.7 South West	BSWSA4	Thames water	Wastewater network unable to support capacity. Local upgrades required to existing drainage ahead of development. Developer to liaise with Thames Water for detailed drainage strategy.	Planning considerations takes into account Thames Water comments from previous consultation. For consistency with other policies this shall be moved to infrastructure requirements.	Planning considerations amend: ~~“Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.”~~ Infrastructure requirements amend: “ <u>Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.”</u>

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.7 South West	BSWSA5	Thames water	• A Thames Water Sewage Pumping Station is located within the proposed development boundary and this is contrary to best practice set out in Sewers for Adoption (7th edition). Future occupiers of the development should be made aware that they could periodically experience adverse amenity impacts from the pumping station in the form of odour; light; vibration and/or noise. • Wastewater network unable to support capacity. Local upgrades required to existing drainage ahead of development. Developer to liaise with Thames Water for detailed drainage strategy.	Noted amend planning considerations to take into account the need to address the existing pumping station. The Plan takes into account Thames Water comments from previous consultation. For consistency with other policies this shall be moved to infrastructure requirements.	Planning considerations amend: <u>"A Thames Water Sewage Pumping Station is located within the proposed development boundary and this is contrary to best practice set out in Sewers for Adoption (7th edition). The development should make suitable arrangements to address this matter satisfactorily and dependent on solutions devised, future occupiers of the development should be made aware that they could periodically experience adverse amenity impacts from the pumping station in the form of odour; light; vibration and/or noise."</u> Planning considerations amend: <u>"Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."</u> Infrastructure requirements amend: <u>"Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."</u>

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.7 South West	BSWSA6	Thames water	No waste water network/infrastructure concerns regarding this development. However It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	The Plan takes into account Thames Water comments from previous consultation. For consistency with other policies this shall be moved to infrastructure requirements.	Planning considerations amend: ~~“Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.”~~ Infrastructure requirements amend: <u>“Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.”</u>
5.7 South West Page 678	BSWSA6	Woolbro Homes	Support for the site allocation is noted. 1. Density: The site capacity stated in Policy BSWSA6 is indicative only. It does however take into account the characteristics of the site. This site is one of the thinnest in terms of distance between the canal and Beresford Avenue. Taking into account the requirements for an appropriate setback from the canal and proximity to the suburban character of the two-storey residential dwellings likely to remain on Beresford Avenue, the site unlike others in the Alperton Growth Area, although considered suitable for tall buildings compared to the opposite side of the road is only appropriate for mid-rise height only. The requirement for there to be no net loss and re-provision of employment floorspace will also impact. A well-designed scheme may be able to provide a higher density than indicated but must adhere to the design principles and planning considerations outlined in the policy. 2. Height: See above response in relation to density.	Woolbro supports the principle of BSWSA6 (representing part of the site - 100 Beresford Avenue: 0.34ha). It has reservations regarding some of the details related to: • Density: Current indicative capacity of 135 units for 0.96 ha. The allocation could deliver higher density than stated of 150-200 noting the approach on approved nearby developments. Such as Afrex House (150 dwellings/ha), Abbey Wharf (178 dwellings/ha), Northfields (317 dwellings/ha), Alperton House (515 dwellings/ha). Officer reports consider this and the proposed density to be acceptable. The cabinet report for the Local Plan accepts that ‘... in terms of built form, the document in terms of scale and density has modest ambitions’. NNPF and London Plan Policy D1B supports to optimise site capacity. The Panel (Oct 19) supported assessment of individual sites. • Height: Woolbro objects to the restriction of buildings to ‘potentially around 6 storeys’ and assessment of height and density should be design-led and made on a site by site basis. SSA7 does not specify height for the allocation. The Alperton masterplan and Brent Design guide seeks developments to relate to existing neighbourhoods drawing on existing context.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.7 South West	BSWSA6	Woolbro Homes	Employment floor space: the land in the allocation is a non-designated employment site and is not designated as a SIL or LSIS. Further, Alperton is allocated as a Housing Zone. Woolbro Homes consider that instead of requiring ‘no net loss’ of employment land in the allocation, reference should instead be made to re-provision of employment use at ground floor level, the quantum of that to be provided should follow assessment of the proposed development scheme as a whole. This amendment would respect Brent’s status as a ‘provide capacity’ borough as well as assist in achieving the Borough’s stated intention to create a mostly residential neighbourhood in this canal side location on land which has been consistently identified by both the GLA and LB Brent to be a sustainable location for the provision of new homes. • Suggested amendments –o Planning considerations: “...Given that the site is existing employment land and Brent’s status as a provide capacity borough, no net loss and re-provision of employment floor space along the ground floors of the new buildings will be <u>sought required</u>. The quantum to be provided should be based on site-specific assessment of proposed development schemes as a whole...” o Design Principles: “Development coming forward should be denser than the surrounding suburban character and is suitable tall buildings of a mid-rise height (potentially around 6 storeys), subject to detailed design analysis showing no adverse impacts and a satisfactory relationship in terms of scale and massing being delivered with the surrounding two storey residential properties that are likely to remain on Beresford Avenue.”	3. The Alperton Masterplan (2011), although mentioning the existing industrial area being transformed into a new, mostly residential neighbourhood, has since been revoked by the council. It was adopted prior to the new London Plan, which names Brent as a 'provide capacity' borough. Given this, the Council maintains that as a starting point there should be no net loss of ground floor industrial floorspace consistent with the London Plan and that meeting this is not incompatible with other housing priorities (specifically, housing provision due to being a Housing Zone), particularly considering that the design principles of the site state that development coming forward should be denser than the surrounding suburban character and that the site is suitable for tall buildings of a mid-rise height. The re-provision of industrial space at ground floor level will also help ensure that the design principle of active frontages being provided along Beresford Avenue and the canalside can be met. As a local employment site, the maximum viable industrial floorspace should be provided. If the applicant cannot meet the site allocation requirement, then they should show that the maximum has been achieved.	BSWSA6 allocated use to reflect London Plan policy amend: "Mixed-use residential-led development incorporating <u>employment industrial</u> uses."BSWSA6 planning considerations amend: "Given that the site is existing <u>employment industrial</u> land and Brent’s status as a provide capacity borough, no net loss and re-provision of <u>employment industrial</u> floorspace...."

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.7 South West	BSWSA7	Thames water	Wastewater network unable to support capacity. Local upgrades required to existing drainage ahead of development. Developer to liaise with Thames Water for detailed drainage strategy. A critical trunk sewer runs through this site which would need to be considered	The Plan takes into account Thames Water comments from previous consultation. For consistency with other policies this shall be moved to infrastructure requirements.	Planning considerations amend: ~~“Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.”~~ Infrastructure requirements amend: <u>“ Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.”</u>
5.7 South West	BSWSA7	St. George	Proposed modification: EXISTING USE: Industrial Mixed Use	Existing use: Agreed amend updated status	BSWSA7 existing use amend: <u>"Mixed-use (Industrial with residential under construction)"</u>
5.7 South West	BSWSA7	St. George	Evidence Base: It is important that the approach of the Regulation 19 Local Plan allows enough flexibility to respond to the objectively assessed needs of Brent, and its population. The policies which affect the Grand Union site should be flexible enough to allow for changes over the plan period, which responding to the scale of development already granted planning permission and acknowledged within the Tall Building Strategy.	The Council agrees that the Local Plan must allow enough flexibility to respond to the needs of Brent and its population, and that policies should be flexible to allow for changes over the plan period. It is agreed that the height parameter plans associated with the outline planning permissions currently give an indication of the maximum range of acceptable heights.	No Change.
5.7 South West	BSWSA7	St. George	INDICATIVE CAPACITY: A minimum of 2900 3,030 new homes	Indicative Capacity: Indicate current consent of 3030.	BSWSA7 indicative capacity amend: <u>"2900 3,030 new homes"</u>
5.7 South West	BSWSA7	St. George	DESCRIPTION OF EXISTING SITE: The majority of the site (with the exception of a small area at the north-west) was part of the Park Royal Strategic Industrial Location (SIL) as designated by the London Plan. The north-west part was formerly that is not SIL land is a non-designated Local Employment Site.	"Description of Existing Site" agree to amendment.	BSWSA7 description of existing site amend: <u>"The majority of the site (with the exception of a small area at the north-west) was part of the Park Royal Strategic Industrial Location (SIL) as designated by the London Plan. The north-west part was formerly that is not SIL land is a non-designated Local Employment Site."</u>

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.7 South West	BSWSA7	St. George	PLANNING HISTORY: Approved application 18/0321 as amended by application 19/2732 varied the hybrid planning application permission for the comprehensive mixed-use redevelopment of the former Northfields Industrial Estate. The scheme proposes demolition of all existing buildings on site and the delivery of a development including 2,900 homes, around 2,300sqm commercial floorspace, a minimum of 17,581sqm and around 19,000sqm employment floorspace and 1,610sqm community and assembly and leisure floorspace (use classes B1a, B1c and B8), around 2,900sqm community and assembly and leisure floorspace (uses classes D1 and D2), an energy centre, public and private open space, new routes and public access along the River Brent and Grand Union Canal, parking and cycle provision and new site access and ancillary infrastructure.	The proposal to update the Planning History section by way of adding the most recent permission and removing the old description of development is noted, however, it is considered that retaining the description of development of the currently approved scheme helps set the context of the planning history of the site. However, the description is proposed to be updated in line with the most recent permission.	BSWSA7 planning history amend: "Approved <u>hybrid planning permission application 18/0321</u> is ~~a hybrid application~~ <u>as amended by permission 19/2732</u> for the comprehensive mixed-use redevelopment of the <u>former Northfields</u> Industrial Estate. The scheme proposes demolition of all existing buildings on site and the delivery of a development including ~~2,900~~ <u>3030</u> homes....."
5.7 South West	BSWSA7	St. George	DESIGN PRINCIPLES: The scale and massing should be sympathetic to existing heights in the surrounding context with lower building heights closer to Beresford Avenue, whilst having regard to the height of buildings established by planning permission 18/0321 (as amended by application 19/2732) for the former Northfields Industrial Estate. Given the scale of the site, it will can create a new building height character. Tall buildings will be appropriate on this site, taking its cue from the scale of buildings approved under planning permission 18/0321 as amended by application 19/2732.	Agree that the design principles should be updated as suggested to take account of the existing consents.	BSWSA7 design principles amend: "The scale and massing should be sympathetic to existing heights in the surrounding context with lower building heights closer to Beresford Avenue. <u>Tall buildings are appropriate on this site consistent with the heights parameters established by planning permission 18/0321 (as amended by application 19/2732).</u>"
5.7 South West	BSWSA7	St. George	JUSTIFICATION: It will provide a minimum of 3,030 new homes 2,900 homes, employment floorspace, community, retail and leisure facilities and includes both a health centre and an energy centre. Reasoning: The site allocation should be updated to reflect the existing use of the site, and the development principles approved and being delivered at Grand Union by planning permission ref. 18/0321 (as amended) supported by existing adopted development plan policy and the Council's own evidence base.	Agree that justification should refer to the currently approved number of homes, but not refer to this as a minimum for flexibility purposes.	BSWSA7 justification amend: "... ~~2900~~ <u>3030</u> homes...."
5.7 South West	BSWSA8	John Cox	Wembley Triangle is where visitors to the Stadium/ Arena from Wembley Central station are most likely to cross. The Plan should support a requirement of facilitating the splitting-up of footfall onto both sides of the street to benefit all business equally. Site allocation BSWSA8 needs to specify that a consistently wide pavement is needed along this section of the High Road/ Wembley Hill Road through receding the building line at the eastern end of the site.	Noted. There are likely to be significant changes to the highway network as part of Wembley Park's western corridor study at Wembley Triangle which would rationalise the highway, provide wider pavements and improve crossing.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.7 South West	BSWSA8	Thames water	Wastewater network unable to support capacity. Local upgrades required to existing drainage ahead of development. Developer to liaise with Thames Water for detailed drainage strategy.	The Plan takes into account Thames Water comments from previous consultation. For consistency with other policies this shall be moved to infrastructure requirements.	Planning considerations amend: ~~“Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.”~~ Infrastructure requirements amend: “ <u>Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.”</u>
5.7 South West	BSWSA8	Quintain	We object to the removal of references to the Wembley Triangle highway improvements from the infrastructure section. The removal of the works from BSWSA8 will significantly weaken the Council’s ability to deliver these improvements and the requirement to safeguard land to deliver the works should be included where required.	Highways does not find it necessary to continue with land take at Wembley Triangle to deliver the junction improvement works.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.7 South West	BSWSA9	Thames water	Wastewater network unable to support capacity. Local upgrades required to existing drainage ahead of development. Developer to liaise with Thames Water for detailed drainage strategy.	The Plan takes into account Thames Water comments from previous consultation. For consistency with other policies this shall be moved to infrastructure requirements.	Planning considerations amend: ~~“Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.”~~ Infrastructure requirements amend: “ <u>Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</u> ”
5.7 South West	BSWSA10	London Hotel Group	Policy supported. • Capacity: It is considered that the 400 homes capacity for residential dwellings can be exceeded and that circa 1,300 dwellings can be delivered in line with the Council’s aspirations for meeting housing demand in Wembley Growth Area.	Support for the aspirations of the allocation is noted. <u>Site Capacity</u> The site capacity stated in the Local Plan is indicative only, based on the circumstances of the site and Brent's Tall Building Strategy. The density matrix in the current London Plan has been removed from the new London Plan and does not take into account site circumstances, or the need to re-provide employment space. A well-designed scheme may be able to provide a higher density than indicated but must adhere to the design principles outlined in the site allocation and other relevant policies in the Local Plan. <u>Trees</u> With regards to trees, it is considered that the policy retains enough flexibility in outlining that trees on the site should be retained where possible, as the council's preference is for the trees on site to be retained. Any future applications resulting against the loss of trees would be assessed against policy BGI2.	No Change.
5.7 South West	BSWSA10	London Hotel Group	• Building height: In line draft New London Plan policy for designed high-density development, we suggest greater than 5-6 storeys due to its location partially in Wembley Town Centre and with high public transport accessibility (PTAL of 4-6a, due to increase to 5-6a in 2031). The development potential of this area should not be restricted by a maximum height at this stage but considered at planning application stage, taking into account planning benefits and design quality.	Scale / Building Heights Similarly for scale and building heights, the allocation of the site for mid-rise buildings up to 5-6 storeys is based on the circumstances of the site and the council's Tall Building Strategy. This site has a multiplicity of ownerships and will be very complicated to deliver. The Local Plan in BD2 policy justification does identify that sites which the Council has not yet identified for tall buildings may come forward where the site is of sufficient size to create its own character. The Council will need	No change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
				to be confident that delivery of the scale identified by the respondent is possible to allow tall buildings clusters and stepping down, etc. to occur.	
5.7 South West	BSWSA10	London Hotel Group	Housing Strategy: LHG note the aspiration of Brent Council to provide minimum 35% affordable housing, and it is suggested that the amount of affordable housing should be the 'maximum reasonable' in the context of viability and other considerations. Site specific discussions with the Council to enable the delivery of the most appropriate mix for Elm Road.	Housing Strategy The borough's approach is consistent with that in the London Plan. If the applicant does not follow the fast track route, then viability will be considered through the process identified in the London Plan/Housing SPG and the site will be subject to on-going reviews throughout its development.	No change.
5.7 South West	BSWSA10	London Hotel Group	Employment and Centres: LHG supports growth in Wembley Town Centre and opportunities for employment. However, a requirement for onsite affordable workspace should not compromise flexibility of an end user and ability for development to feasibly come forward. Guidance on how financial contribution in lieu of onsite provision is to be calculated should be provided.	Employment and centres: Where the affordable workspace requirement is making a site unviable it is likely that the site will be subject to viability testing as ultimately it is assumed that a lower proportion of affordable housing will be offered. At this stage the Council will consider the implications of all its policy requirements and prioritise those which it feels are worth pursuing, considering the impacts of the scheme in the round. The Council will produce guidance on how financial contributions will be calculated in a future Planning Obligations SPD.	No change.
5.7 South West	BSWSA10	London Hotel Group	Parking: LHG acknowledges the policy direction towards encouraging sustainable modes of transport. It is considered that in accessible locations, car free development is a good starting point for development.	Noted.	No change.
5.7 South West	BSWSA10	Thames water	Wastewater network unable to support capacity. Local upgrades required to existing drainage ahead of development. Developer to liaise with Thames Water for detailed drainage strategy.	Noted. Add reference to waste water matters under infrastructure requirements.	Infrastructure requirements amend: “ <u>Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</u> ”
5.7 South West	BSWSA12	Sudbury Town Residents Association	STRA Neighbourhood Forum objects to the site allocation. The planning application for demolition of Keeler's Garage and development of a 5-7 residential block has been called-in by STRA Neighbourhood Forum currently awaiting the Secretary of State's decision. The allocation is contrary to the retention of Industrial space and the proposed Policy BP7 SOUTH WEST e) ensures no net loss of industrial floorspace .	Vale Farm: It is not clear what the concerns of STRA are. The Local Plan does not need to repeat the neighbourhood plan's contents verbatim. The draft Local Plan recognises the opportunities for improvement and enhancement of Vale Farm Sports Centre (Policy BP7 (n)). The Council also supports STRA's ambition for improvements and recognises in the Local Plan that it will explore all options of how this can be achieved within the financial parameters available to it (5.7.25). The open space at Vale Farm is identified as a Local Green Space. This designation is equivalent to Green Belt in national policy in terms of its level of protection (5.7.26). There is nothing in the Brent Local Plan that is inconsistent with the neighbourhood plan or which seeks to usurp its contents.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.7 South West	BSWSA12	Sudbury Town Residents Association	Removal of the allocation of the Keelers' site.	The council is required to deliver 2325 homes per annum according to the new draft London Plan and this site allocation contributes towards the borough's housing need. Suitable levels of replacement car parking for disabled station users will be retained. Supporting the need to address climate change and air quality in Brent, the Council wants to discourage the use of cars and optimise the capacity the site offers.	No Change.
5.7 South West	BSWSA14	Sudbury Town Residents Association	Those that live and work within the Sudbury Town Neighbourhood Forum Area have overwhelmingly objected to the loss of this car park and residential development. This is also contrary to the Equalities Act and gives inadequate provision to Disabled persons. Development should protect and enhance the setting of the Grade II* listed Sudbury Station. Suitable levels of replacement car parking for disabled station users must be retained.	Suitable levels of replacement car parking for disabled station users will be retained. In seeking to address climate change, improve air quality and provide for meeting housing need as well as other environmental benefits such as introduction of additional greening, the Council wants to discourage the use of cars and optimise the capacity the site offers. This will be done in a manner that is not inconsistent with the need to protect or enhance the setting of the heritage asset.	No Change.
5.7 South West	BSWSA14	Sudbury Town Residents Association	Removal of the allocation of the Sudbury town station car park site.	The council is required to deliver 2325 homes per annum according to the new draft London Plan and this site allocation contributes towards the borough's housing need. Suitable levels of replacement car parking for disabled station users will be retained. Supporting the need to address climate change and air quality in Brent, the Council wants to discourage the use of cars and optimise the capacity the site offers.	No Change.
5.7 South West	BSWSA14	TfL Commercial Development	TfL CD continues to support the allocation of sites within Alperton under site allocation BSWSA1, and the inclusion of site allocation BSWSA13: Sudbury Town Station Car Park for residential use. Whilst the consultation statement notes that the currently drafted capacity of 30 residential units is indicative and therefore flexible, there is lack of background evidence base, which justifies this number and does not accurately reflect the site's capacity and efficient use of the site. • Reasoning: Given its high PTAL rating of 4-5 and the draft London Plan Policy for maximising development on underused brownfield sites in areas of high accessibility or close proximity to transport hubs. • Suggestion: Initial design work indicates capacity of approximately 55 units and this should be reflected in the site allocation.	Support for the site allocation is noted. The site capacity provided in the local plan is indicative only, taking into account the circumstances of the site (including the need to protect and enhance the setting of the Grade II* listed Sudbury Station, and retaining suitable levels of replacement car parking for disabled station users). It is noted that the estimate provided by TfL is above that in amendments made to planning application 19/1241, which in itself is a single tenure, wholly 1 bed development, inconsistent with the Council's policy approach of promoting a range of dwellings sizes in major developments. It is agreed that a well-designed scheme may be able to provide a higher density than indicated but must adhere to the design principles and planning considerations outlined in the policy.	No Change.
5.7 South West	BSWSA16	EHG Alperton	416 Ealing road: Client is in discussion with Council (19/0262/PRE) developing a mixed use scheme with 160 residential units with 400sqm commercial space. Received support from Council and GLA. It is requested the allocation is amended to give an indicative capacity of 150 homes to maximise the use.	Broad support of the land owner is noted. It is noted that the site has been subject to pre-application discussions for a scheme with a much greater housing total. Whilst the site capacity stated in the Local Plan is indicative only, based on the circumstances of the site and Brent's Tall Building Strategy it is agreed a well-designed scheme may be able to provide a higher density than indicated. As such the indicative capacity will be raised to 120 dwellings to take account of the potential need to reduce mass proposed in the pre-app.	SBSWSA16 indicative capacity amend: " ~~80~~ <u>120</u> "

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.7 South West	BSWSA16	EHG Alperton	• 45-47 Alperton Lane: Why is the site now part of the Alperton South LSIS. The 2015 Brent Employment Study identified this site (C16 Alperton Lane) in poor condition and that parking is inadequate for B2/B8 uses. o Principally disagree with following comment by the Brent Industrial Land Audit October 2019: ‘To the north the site is bounded by open space, a large format retail unit and two industrial units comprising factories, warehouses and premises. In terms of function, these industrial premises form a natural extension to the LSIS. This comprises a site of 4,900sq.m. To protect the industrial function of these premises the LSIS boundary is to be extended to encompass them.’o The site does not form a natural extension to the LSIS, Alperton Lane is in fact considered to form the natural boundary to the LSIS particularly given emerging plans for the Curry’s site. In site’s pre-application discussion (ref. 16/0537/PRE), the Council were supportive of a residential led development. Surrounding context of the site is different to that of the existing LSIS south of Alperton Lane. There is two storey terraced housing to the north of the site on Burns Road and an emerging high-density residential development at Curry’s 416 Ealing Road to the east. The immediate context is therefore predominantly residential in nature and so not considered to be suitable for intensified B class uses. o In the absence of clear or robust justification for including 45-47 Alperton Lane it is requested in the first instance this parcel of land be removed from the Alperton South LSIS. Should the Council reject the above position, in the second instance it is requested this parcel be separated into a separate LSIS from Alperton South where co-location of uses would be acceptable. It appears illogical as to why this parcel of land is protected for solely employment uses as opposed to suitable for co-location of uses; this site in our view could be a bridge between the residential and the industrial uses where a co-location of uses would be most appropriate.	In relation to the adjacent industrial site, the new London Plan identified Brent as a borough which is to provide industrial floorspace capacity. Following this, Brent undertook an Industrial Land Audit which provides recommendations to increase industrial floorspace through intensification, co-location and other mechanisms, and allowed the potential to extend current SIL / LSIS boundaries to support the aim of providing industrial floorspace capacity. Any pre-app discussions from 2016 involving the adjacent site would have been undertaken within a previous policy context, prior to Brent understanding the implications of its provide capacity borough status. As such if the council were supportive of a residential led development in the past, this would be outweighed by the current policy context. The council maintains that this adjacent industrial site (comprising factories, warehouses and premises) is a natural extension to the LSIS in terms of function and therefore should be included within the LSIS in order to protect their industrial function and support the identification of Brent as a provide capacity borough. Brent's Industrial Land Audit identified that this LSIS was not appropriate for co-location. Because this parcel of land has been included in the Alperton South LSIS (due to being a natural extension to it) it is not considered to be appropriate for co-location. Additionally, the West London Employment Land Review has identified that LSIS sites such as this are likely to be viable to come forward solely with industrial uses and would not require any residential development to help subsidise this.	No change.
5.7 South West	Blank South West	EHG Alperton	Locally Significant Industrial Site (LSIS), ‘Alperton South’, boundary has been revised to include 45-47 Alperton Lane.	The site is considered appropriate to designate as LSIS given the borough's provide capacity designation, its designation as such gives it a greater degree of protection for industrial uses and potential to intensify.	No Change.
5.7 South West	Blank South West	John Cox	The Plan is not positively prepared with regards to area immediately surrounding Wembley Central station. Spatial planning in this area in relation to maximising social benefit, in a location where attracting investment is possible, has not been addressed. Historically, the old West Coast Main Lines placement resulted in the poor capitalisation of land surrounding stations. The Metropolitan/ Jubilee lines came later, directing routes through existing settlements to support growth in those areas. The Great Central railway was built to provide links to Sheffield and Manchester, not to serve London’s suburbs. Therefore, the WCML stations have little sense of place, including: Queens park, Kensal Green, Willesden Junction, Harlesden, Stonebridge Park, Wembley Central, North Wembley, South Kenton, and Kenton. The line needs a Town Centre along it to provide a commercial, but	Wembley Central station is located within Wembley town centre, which is recognised as a Major Town Centre in Brent’s town centre hierarchy (as shown in par. 6.4.27). It is also allocated as a growth area, to encourage regeneration and high quality mixed use environments. The council does not agree that the Local Plan policies in relation to land around Wembley Central do not maximise social benefit or enable Wembley Central to perform a social function. The Elm Road site allocation, the site allocation closest to Wembley Central station and which sites partly within Wembley town centre boundary, requires future development to include accessible community facilities. Other policies in the local plan, such as BH5, will also ensure social benefit through the delivery of affordable housing. In addition to this, Wembley is also recognised as one of Brent’s nine priority town centres, and	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
			particularly a social function, such as is afforded by the Jubilee Line. The Centre should be Wembley Central. It should be attractive, with wide pavements, trees attracting significant dwell times. Currently seems like a place where people just pass through. Town centres are places for all people to congregate, not just shop. Wembley High Road is at capacity, with Bridgewater Road being built in 1929 for a bypass for it to the North Circular. Wembley Growth Area policy is unsound as not positively prepared enough. Promotion of development within Wembley High Road East as an important place should be made. The road should have a sense of place, not just movement as is permeated throughout the DNLP. The centre also needs to support visitors to the Stadium/ Arena, which in turn should help support local businesses. In practice this should involve closing side roads onto the High Road, and making Ealing Road a T-junction, not a crossroad. As a result side roads may need reconnecting to meet needs. Money flowing from development should be directed toward these aims. The building line should recede, providing developers more height in return. It is unacceptable that there are single storey shops meters away from the station. These should be developed. The new stairway to the rear of the station is impressive, but it's a shame the building line wasn't taken back. The set back which has taken place is interrupted by columns for the support of upper floors. This exemplifies Council hesitation due to poor vision impacting design quality/ outcomes. The shops between the existing station plaza and the new south-western side development should be allocated for development. There should also be another large site allocation on the north west corner of the high road, including the majority of the adopted service road to the rear of the shops, and possibly including the houses on the south of Turton Road (which would otherwise be overshadowed by proposed development). Unfortunately this location already includes one new small attractive development, and therefore new development would need to fit around it. I am not suggesting the substantial buildings on the High Road between Ealing road and park lane are removed. This includes Lancelot Road which should be closed and given new connection via side roads to the north. The northern side shops above the railway tracks may require inclusion as this would provide opportunity to recede the building line. The biggest problem here would be land assembly.	the council is producing town centre action plans that deal with objectives relating to retail, improving the economy, making centres more attractive and accessible and allowing them to better meet the needs of the surrounding community and providing for additional housing opportunities. Once development is completed as part of the nearby Wembley Park development, Wembley and Wembley Park should form one contiguous town centre and due to this the new draft London Plan identifies the single emergent town centre as a potential Metropolitan Centre. Policies BE4 and BE5 seek to ensure that Brent's town centres (including Wembley) continue to function, serving their immediate communities while attracting a wider catchment in the case of Wembley. BE7 requires that proposals to shop fronts demonstrate high quality design and that forecourt trading does not cause obstructions, contributions towards attractive town centres and encouraging human activity. Provision of trees is also supported by the local plan. Closing side roads onto Wembley High Road would not require a local plan policy and could be taken forward as part of a highways scheme. Any proposals for development (including those which would affect the size of forecourts and pavements) would be assessed against relevant design policies and take into account accessibility, again linking into wider social benefits. Building lines of potential development (and increasing the height of buildings as a trade-off for this) would be considered against relevant policies. This is occasionally a consideration as part of the planning process. With regards to potential additional sites near Wembley Central station, the council has in the past undertaken a 'call for sites' exercise and as part of its Issues and Options consultation asked whether there were any specific sites that people were aware of that could be identified as Local Plan site allocations. In the absence of representations or evidence from landowners for the sites identified in the representation to suggest that they would be supportive of sites / land being available for development, the council considers that the general policies of the Plan which identify the scope for town centre sites to intensify for a wide range of uses and to accommodate taller buildings is a sufficient positively prepared approach to encouraging future development. On Elm Park Road it has been able to go further because of developer interest. Many of Brent's town centres feature single storey shops which could be suitable for re-development. The council provides an enabling role for development to come forward and would be supportive of mixed-use development in town centres and growth areas. Should any sites come forward, they would be assessed against Brent's Tall Building Policy and Tall Building Strategy (which outlines which parts of Wembley Central are designated at tall building zones) and would also need to have regard to Brent's design policies.	

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.7 South West	Blank South West	John Cox	The proposed new T-junction at Wembley Triangle must be publicly consulted on. The aim should be to de-emphasise the straightness of the High Road, giving the three roads at the junction equal priority visually (even if A404 traffic is prioritised). This will provide a more attractive street scene for pedestrians, including those yet to cross the road from Wembley Central. Wembley Stadium station should be sign-posted for cars, cyclists and pedestrians. You may also remodel the junction of Wembley Park Drive and Empire Way which should involve public consultation. This will require consideration of which road to prioritise, or giving a 'three-equal-legs' junction (even if some are favoured by lights). Segregated cycle lanes and pedestrian should be a top priority.	Consultations on changes to the highway would be carried if required by relevant legislation. Changes to Wembley Triangle or remodelling to the junction of Wembley Park Drive and Empire Way do not require a local plan policy and could be taken forward as part of a highways scheme as they will not need to go outside the current highway boundary. The council agrees that the needs of cyclists and pedestrians should be considered in any junction remodelling.	No Change.
5.7 South West	Blank South West	Sudbury Town Residents Association	Sudbury Town Residents Association and Neighbourhood Forum conducted a survey and asked those who live and work within the area, whether they support the Sudbury Town Neighbourhood Plan or the Draft Local Plan. More than 319 persons living or working expressed their opinion and 100% of those surveyed support the Sudbury Town Neighbourhood Plan, 0% support the Draft Local Plan. If required, STRA can submit a copy of this Survey. STRA Planning have reviewed the Draft Local Plan document for the South West Area of Brent and have many concerns that the Draft Local Plan is not positively prepared, not justified, not effective and inconsistent with National Policies. In addition, the Draft Local Plan is not consistent with the Sudbury Town Neighbourhood Plan, which is a planning policy for 10 years.	Whilst it is not disputed that STRA got this many people to sign a petition, the wording of what people were asked to sign if consistent with STRA's representation does not reflect the content of the majority of the draft Local Plan. It is noted that in drawing people's attention to the content of the Local Plan to sign the petition, additional representation on the Plan's contents from concerned residents was limited.	No Change.
5.7 South West	Blank South West	Sudbury Town Residents Association	Removal of Intensification Corridors from the Plan regarding Sudbury Town.	The council is required to deliver 2325 homes per annum according to the new London Plan. Not only does BSWA12 contribute towards meeting the borough's housing need, it would provide maximised ground floor employment uses, contributing to the local economy. An application on this site has been recommended for approval subject to legal agreement.	No Change.
5.7 South West	Blank South West	Sudbury Town Residents Association	There is a shortage of Secondary Schools currently and the increase in residential units will only exacerbate the problem. The Council are responsible for school placements but have no Secondary Schools.	The Infrastructure Delivery Plan shows Secondary School projects currently being planned for or considered within Brent and will be updated on a rolling basis. There is sufficient supply planned to meet identified needs.	No Change.
5.7 South West	Para 6-4-27	Sudbury Town Residents Association	Correction of the definition of Sudbury Town as a Town Centre to read a Local Centre.	All designated Local, District and Major centres in Brent are considered to be town centres. It is therefore not incorrect to refer to Sudbury Town as a town centre, as Sudbury Town has a town centre boundary as designated on the policies map. Page 321 of the local plan shows the town centre hierarchy and correctly shows Sudbury Town as a local centre within the hierarchy.	No Change.

6.1 DESIGN

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.1 Design	BD1	Quintain	Support the need to identify locations for tall buildings and that growth areas are acceptable for these. The Tall Building Strategy has been significantly revised, and considering the following is addressed, we consider it a sound evidence base. Map identifies both a core and pinnacle zone which have been annotated using the same polygon and is therefore not clear if these represent different designations. Pinnacles have not been shown in the Tall Building Strategy. The pinnacle designation should either be removed, dealt with whilst masterplanning, or that the Tall Building Strategy is updated to include these locations.	The policies map key does include pinnacle, which has not been populated. It shall be removed from the key. The Tall Buildings Strategy previously set out a more rigid approach to development stepping down from the pinnacle. Whilst the pinnacle building height is still identified in the strategy in some zones, this indicates the maximum height that is considered acceptable, but does not necessarily mean that this height can only be achieved within the current pinnacle site, or immediately adjacent to it. Opportunities might well exist for a variety of locations in the zone for such height.	Remove from the Planning Policies Map Key: "Pinnacle" associated with the Tall Buildings Zones.
6.1 Design	BD1- BD2	TfL Commercial Development	Agree development should respect local character and context with regards to scale and massing etc.. NDLP policy D6 states that densities should be optimised considering character, land uses, existing and planned accessibility and connectivity, and infrastructure capacity. As such there should be greater flexibility on development heights, using a design-led approach. The Council's Consultation Statement notes that developments outside of Tall Building Zones must respond positively to existing character, including heights, but proposes no increased flexibility to help implement this. Under a site by site design-led approach the policy would ensure this is accurately reflected to allow for optimal growth. In addition, the exception circumstances within which tall buildings would be permitted outside of the zones should include: 'positive additions to the skyline that would enhance the overall character of the area'. The requirement for the building to be of civic or cultural importance is overly specific and restrictive, and will not promote tall buildings where suitable.	The Council has taken a plan led approach to identifying where Tall Buildings are likely to be appropriate in the borough. This focuses on clusters, rather than one off tall buildings. The Plan identifies a large number of areas where tall buildings are appropriate. It is not considered to be overly restrictive with regards to the opportunities available. The policy justification indicates that flexibility might exist where it can be justified, however this is seen as being the exception rather than the norm.	No Change.
6.1 Design	BD2	Barratt London and TFL	The southern part of BCSA7 Wembley Park Station is contained within the Wembley Park Tall Building Zone, but not in the Core. This highly accessible location is suitable for high-density development and is a strategic source of housing under Policy H1. The allocation's eastern extent next to the station entrance is entirely appropriate for a tall building as it is also adjacent to the Core. This would maximise housing delivery. A landmark building would also aid the area's legibility, signposting Wembley Park Station. Adjacent tall buildings are along Brook Avenue. The area's character therefore allows for equivalent or taller height buildings. The boundary of the Tall Building's Zone 'core' should be extended including all of the south part of BCSA7: Wembley Park Station (North & South) allocation.	It is agreed that the southern part of BCSA7 is appropriate for tall buildings. As identified in the Tall Buildings Strategy, it is not considered that this site is appropriate for very tall buildings that might be acceptable if it were within the core. Notwithstanding its accessibility to public transport, the station is on the edge of the Tall Buildings Zone and as such it is considered that the scale of development, consistent with the rest of the strategy should reduce towards its edges for development to have a more sympathetic relationship with the adjacent lower rise character. To emphasise the importance of the station as a landmark destination a high quality design that creates a striking building could be used, rather than relying on increased height as the marker.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.1 Design	BD2	Environment Agency	In our previous Regulation 18 Policy BD2 response we recommend an additional height restriction directly adjacent to watercourses due to detrimental impacts on ecological value through increased shading. Such development depending on height may require greater than the standard 8 metre buffer adjacent to a watercourse. If this is not possible, shading or encroachment impacts must be mitigated for, either on the site or elsewhere. No substantial amendment to this policy has occurred. A proposed amendment in the Brent Local Plan Preferred Options Consultation Responses, October 2019, states, “The design criteria in the Tall Buildings Strategy are now expanded and are also included in the Local Plan policy justification including the following sentence in the Wembley Park search area text in the Tall Building Strategy: ""Waterside development should be sufficiently set back and avoid overshadowing of the watercourse". This proposed change is not evident in the Local Plan Regulation 19 Consultation document or Brent Tall Building Strategy October 2019, and therefore expect further clarity on where these amendments are contained.	The reference in the Brent Local Plan Preferred Options Consultation Responses, October 2019, to the amendment of the Tall Building Strategy: "Waterside development should be sufficiently set back and avoid overshadowing of the watercourse" was unfortunately an error and not reflected in the Strategy which underwent extensive change post Preferred Options stage as a result of feedback received. For developments adjacent to waterways policy BGI1 identifies that "development is required to improve access to the waterway, enhance its setting and provide an appropriate landscaped set-back which may include public open space". This together with the requirement in BD2 for tall buildings to "positively address their ...environmental impacts" gives sufficient scope to ensure that the quality of Blue Infrastructure is not unacceptably undermined and ideally improved. Those areas identified as appropriate for tall buildings south of a watercourse and therefore likely to have the most potential for over-shadowing are along the Wembley Brook between Wembley Park Drive and Fourth Way. In terms of the watercourse itself, along the whole of its length it is a concrete channel with vertical sides and no vegetation within it. It therefore has very limited bio-diversity. The potential for this realistically to be changed is very limited due to the structural integrity of the channel needing to be maintained on both sides and the limited potential to pull back development significantly along its whole length from the channel due to the size of plots. As such it is likely that in most cases the best solution that can be attained is improving the setting of the channel, providing gaps so that it can be more easily seen/appreciated and improving bio-diversity at ground level adjacent to it.	No Change.
6.1 Design	BD2	St. George	Object as: no sufficiently flexible, not effective. Proposed modification: In Tall Buildings Zones heights should be consistent with the general building heights shown on the policies map, stepping down towards the Zone’s edge. Elsewhere tall buildings not identified in site allocations will only be permitted where they are: Reasoning: The proposals map does not show general building heights. Evidence base: The proposals map.	The policies map will be interactive and give an indication of the heights when the layer is clicked on sites that fall within its boundaries. The reference to site allocations is required as some allocations identify heights that are tall enough to be regarded as Tall Buildings, but not of a height to warrant identification of a Tall Buildings Zone (includes buildings 10 storeys or above).	No Change.
6.1 Design	BD2	Wembley Towers Limited	Generally support as BSSA6 and BSSA7 fall within a Tall Building Zone. Policy states that heights should be consistent with general heights, stepping down towards the zone's edge. Although these sites have exceptional constraints, including flood risk (being resolves), there is significant opportunity for enhanced place-making and density/ height uplifts. Therefore there is scope to secure maximum heights on this sites. Therefore the policy should be made more flexible so as to allow for this.	This is not considered appropriate. The allocated sites are not within an intensification corridor (in recognition that they are allocated and that taller heights than 5 storeys might be appropriate). Whilst some potential flexibility is considered appropriate in town centres where there might be more of a variety of building heights, and character, the intensification corridors tend to have a more uniform low rise character within them and adjacent. The policy justification indicates that flexibility might exist where it can be justified, however this is seem as being the exception rather than the norm.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.1 Design	BD2	GLA	2. (BHC2) Support protected views and illustration on policies map. Recognition of DNLP HC4 noted also. The background view is key, and in order to follow HC4 correctly, this part needs to be illustrated clearly. Brent should consider providing evidence as to why these views are important and what makes them locally significant. This will help form the basis for decision making.	2. The background view is included on the policies map. It is appreciated that the current A0 map that shows all policies is busy and it can be difficult to make out a particular viewing corridor clearly. There was another map provided to assist with less designations on it that allowed better understanding of the extent of the views in the foreground which also extended beyond the stadium for a few hundred metres in some cases. Once the Plan has been adopted, the map will be made interactive, and it will be possible to filter out layers which impact on the map's clarity.	No Change.
6.1 Design	BD2	Mary Duffy	Brent gives too much weight to desires of developers, including Quintain and Aitch. They should not be allowed to build as tall as they like. Brent has remained predominantly low-rise for generations, and the London Plan seems intent increasing development height around the North Circular. Developments show short-sightedness and cater only to developer profits. The Tipi homes do not appear popular and Brent may have to buy these back to reassign to social housing at a later date.	The need to accommodate additional homes, employment and associated social infrastructure to meet growing population needs will require a more intensive use of land. The Council has sought to positively plan for parts of the borough to accommodate taller buildings in its Tall Buildings' Strategy. This will ensure that the majority of Brent remains low rise in character.	No Change.
6.1 Design	BD2	DTZ Investors	Object as the policy is unsound, being insufficiently flexible. It should be amended, removing: 'In Tall Buildings Zones heights should be consistent with the general building heights shown on the policies map, stepping down towards the Zone's edge.' The policies map should be amended as shown for the "core" (blue) tall building area to cover a larger extent, reflecting the existing tall building character within the immediate locality and A5 frontage. The map does not contain general building heights mentioned in the policy. In any event it would be inappropriate to do so. The Local Plan would date very quickly with their inclusion.	The policies map will be interactive and give an indication of the heights when the layer is clicked on ~~on~~ sites that fall within its boundaries. It is considered an appropriate response for the Zone to reduce in scale towards its edges, particularly where a lower rise context will prevail. In relation to the Core for Zone C for the Colindale Tall Building Zone as identified in the Tall Buildings Strategy, it is recognised that the Zone as shown is slightly inconsistent with the wording and should extend further east to follow the main building line along the A5.	Amend the map in the Tall Buildings Strategy and Policies Map to show the Tall Buildings Zone Core in Zone C of the Colindale Tall Buildings Zone extending to the edge of the main building line along Edgware Road so that it is consistent with the text in paragraph 8.51 of the Tall Buildings Strategy.
6.1 Design	BD2	Environment Agency	Pleasant policy requires tall buildings to positively address environmental impacts. However not able to see amendments addressing our previous points specific to tall buildings next to watercourses.	The reference in the Brent Local Plan Preferred Options Consultation Responses, October 2019, to the amendment of the Tall Building Strategy: ""Waterside development should be sufficiently set back and avoid overshadowing of the watercourse" was unfortunately an error and not reflected in the Strategy which underwent extensive change post Preferred Options stage as a result of feedback received. For developments adjacent to waterways policy BGI1 identifies that "development is required to improve access to the waterway, enhance its setting and provide an appropriate landscaped set-back which may include public open space". This together with the requirement in DB2 for tall buildings to "positively address their ...environmental impacts" gives sufficient scope to ensure that the quality of Blue Infrastructure is not unacceptably undermined and ideally improved.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.1 Design	BD2	Stonebridge Real Estate Development	Generally support as BSSA6 and BSSA7 fall within a Tall Building Zone. Policy states that heights should be consistent with general heights, stepping down towards the zone's edge. Although these sites have exceptional constraints, including flood risk (being resolves), there is significant opportunity for enhanced place-making and density/ height uplifts. Therefore there is scope to secure maximum heights on this sites. Therefore the policy should be made more flexible so as to allow for this. Proposed Modifications: Update BD2 as underlined to ensure it is sound and consistent with other policies and allocations in the plan: 'In intensification corridors and town centres outside conservation areas developments of a general building height of 15 metres above ground level could be acceptable, with opportunities to go higher at strategic points in town centres and intensification corridors.'	This is not considered appropriate. The allocated sites are not within an intensification corridor (in recognition that they are allocated and that taller heights than 5 storeys might be appropriate). Whilst some potential flexibility is considered appropriate in town centres where there might be more of a variety of building heights, and character, the intensification corridors tend to have a more uniform low rise character within them and adjacent. The policy justification indicates that flexibility might exist where it can be justified, however this is seem as being the exception rather than the norm.	No Change.
6.1 Design	BD2	GLA	SPLIT INTO 2 1. (BD2) Welcome measures taken to define what constitutes a tall building, setting out 6m above prevailing heights, or 30m+. It is not clear when and where each of these is to be applied and therefore the policy requires amending to make this explicit. The policy also states that the policies map sets out the general building heights which it does not. Neither does it define what is meant by the zone, core and pinnacle which also requires clarification.	The policies map does not currently provide the appropriate building heights within the Tall Building Zones, these were set out in the supporting Tall Buildings Strategy. When the Local Plan is adopted it will be accompanied by an interactive policies map that will be produced (similar to the existing Brent Policies map) which will provide the building heights as identified in the Strategy. In terms of the pinnacle, it is proposed that this will be removed from the Policies Map key as it is now not going to be shown and reflected an approach in the Tall Buildings Strategy which is no longer being adhered to in such a definitive manner as was previously considered appropriate.	Planning Policies Map Key amend: remove "Pinnacle" associated with the Tall Buildings Zones. Planning Policies Map amend: Add appropriate building heights for the Tall Buildings Zones on the interactive map consistent with the Tall Buildings Strategy.
6.1 Design	BD3	J M Kirker	Plans for basement developments are inadequate as there is no requirement for assessment of the impact upon local conditions, including groundwater, flooding, subsidence etc. as has been considered by other Boroughs. Policy does not address residents concerns in this regard.	The concern about impacts on neighbours, particularly those sharing a party wall with a basement development is understood. The approaches mentioned by other councils were considered at the time the Council produced its Basement SPD. Notwithstanding other boroughs' approaches, where the scale of basement developments are in comparison to Brent very large, the Council does not consider that the structural elements in particular sought in the representation fall within the remit of planning. Inclusion of these requirements gives residents unrealistic expectations of what falls within the remit of planning (which has a statutory requirement to not duplicate matters addressed by other legislation) and the level of enforcement it has against should development not be in accordance with the assessments, or despite the assessments being followed there is still structural failure affecting neighbours.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.1 Design	BD3	Danielle Rapaport & David Hall	Process and consideration for granting of basement development not as thorough as other boroughs, causing significant concern in the neighbourhood. This is in light of the application for Exeter Road, which we previously opposed. This application did not include a technical investigation into the potential impacts for the area, particularly considering increase subsidence in the area.	The concern about impacts on neighbours, particularly those sharing a party wall with a basement development is understood. The approaches mentioned by other councils were considered at the time the Council produced its Basement SPD. Notwithstanding other boroughs' approaches, where the scale of basement developments are in comparison to Brent very large, the Council does not consider that the structural elements in particular sought in the representation fall within the remit of planning. Inclusion of these requirements gives residents unrealistic expectations of what falls within the remit of planning (which has a statutory requirement to not duplicate matters addressed by other legislation) and the level of enforcement it has against should development not be in accordance with the assessments, or despite the assessments being followed there is still structural failure affecting neighbours.	No Change.
6.1 Design	BD3	Julia Hanika	Initially welcomed the premise of a Brent Planning Basement SPD. However, it does not set rigorous enough requirements. Camden, Westminster, Kensington & Chelsea and Islington require a 'Basement Impact Assessment'. This is a standard set of safeguards for the planning team and the public at large. A glaring omission from the Brent SPD is a 'The Structural Method Statement (SMS) which requires qualification by consultants related to each field. These include a Basement Impact Assessment overview report (structural engineer), Full structural design drawings and calculations (structural engineer), Construction Method Statement (structural engineer), Ground Investigation and Assessment (hydrogeologist) and Ground Movement Assessment (structural engineer). Larger schemes may also require further reports. In the Brent SPD these are suggested, not required. As such, it relies on Building Control picking up problems and reliance on the integrity of the professional teams. Camden require applicants to pay for these reports which are subject to independent audit. Brent's plan should have parity of requirements including those in the National Planning Policy (NPPF) paragraph 153.	The concern about impacts on neighbours, particularly those sharing a party wall with a basement development is understood. The approaches mentioned by other councils were considered at the time the Council produced its Basement SPD. Notwithstanding other boroughs' approaches, where the scale of basement developments are in comparison to Brent very large, the Council does not consider that the structural elements in particular sought in the representation fall within the remit of planning. Inclusion of these requirements gives residents unrealistic expectations of what falls within the remit of planning (which has a statutory requirement to not duplicate matters addressed by other legislation) and the level of enforcement it has against should development not be in accordance with the assessments, or despite the assessments being followed there is still structural failure affecting neighbours.	No Change.
6.1 Design	BD3	Kate Duffy	Current Brent policy does not require provision of technical or engineering based data at the planning application stage. Other London boroughs now require full assessments of a consideration of a scheme's impact on drainage, flooding, groundwater conditions and structural stability etc. in the form of a basement impact assessment at the application stage. Brent's policy needs to reflect concerns about structural and other implications of basement development.	The concern about impacts on neighbours, particularly those sharing a party wall with a basement development is understood. The approaches mentioned by other councils were considered at the time the Council produced its Basement SPD. Notwithstanding other boroughs' approaches, where the scale of basement developments are in comparison to Brent very large, the Council does not consider that the structural elements in particular sought in the representation fall within the remit of planning. Inclusion of these requirements gives residents unrealistic expectations of what falls within the remit of planning (which has a statutory requirement to not duplicate matters addressed by other legislation) and the level of enforcement it has against should development not be in accordance with the assessments, or despite the assessments being followed there is still structural failure affecting neighbours.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.1 Design	BD3	Michael Rustin	Brent's policy is much less rigorous on technical issues than that of other neighbouring boroughs. Close proximity of basement development to other dwellings raises structural issues, especially potential subsidence. How do Brent's procedures take account of such risks to neighbours?	The concern about impacts on neighbours, particularly those sharing a party wall with a basement development is understood. The approaches mentioned by other councils were considered at the time the Council produced its Basement SPD. Notwithstanding other boroughs' approaches, where the scale of basement developments are in comparison to Brent very large, the Council does not consider that the structural elements in particular sought in the representation fall within the remit of planning. Inclusion of these requirements gives residents unrealistic expectations of what falls within the remit of planning (which has a statutory requirement to not duplicate matters addressed by other legislation) and the level of enforcement it has against should development not be in accordance with the assessments, or despite the assessments being followed there is still structural failure affecting neighbours.	No Change.
6.1 Design	BD3	Thames water	The response of the Council to the representation on sewer flooding was not satisfactory in referring to mechanisms in building regulations dealing with sewer flooding. Building Regulations only require pumped devices in high-risk areas, with anti-flooding valves installed in areas at low risk. There is no absolute requirement for pumped devices. The risk of sewer flooding can change as additional flows are connected and climate change results in storms that are more intensive. Risks also increase if there are any operational issues with the network. Valves can be blocked and prevented from closing properly. When closed there is a risk in flooding from wastewater generated within a property. Consequently all basement developments should be fitted with a positive pumped device or similar. This will ensure that the property is adequately protected sewer flooding risk consistent with NPPF paragraph 149. Similar to Policy CL7 of the Royal Borough of Kensington and Chelsea Local Plan, a bullet point added to Policy BD3 should state:- Be protected from sewer flooding by a suitable pumped device.	As Thames Water identify there is no requirement through building regulations for pumped devices, yet there are potential on-going flood risks through not having pumped devices, and that such devices are necessary to ensure that the development does not cause increased unacceptable flood risk to occupants (which is not addressed in Policies BSUI3 and BSUI4). As such it is considered appropriate to add the suggested additional bullet to the policy.	Amend Policy BD3 by adding another criterion: "g) Be <u>protected from sewer flooding by a suitable pumped device.</u> "
6.1 Design	BD3	Paul Handley	Paragraph 6.1.3 recognises potential negative impacts of basement delivery but states that such concerns are controlled by regimes outside the planning system. This represents an abdication of responsibility by the planning department. The policy should be more in line with other London Boroughs, using a more stringent approach by requiring specific technical and engineering data at application stage. Approval should only be given once demonstrated the proposal will not harm neighbouring properties, or the structural, ground, or water conditions of the area. A full range of technical criteria should be required, including on: drainage, flooding, groundwater, and structural stability, establishing a comprehensive impact assessment.	The concern about impacts on neighbours, particularly those sharing a party wall with a basement development is understood. The approaches mentioned by other councils were considered at the time the Council produced its Basement SPD. Notwithstanding other boroughs' approaches, where the scale of basement developments are in comparison to Brent very large, the Council does not consider that the structural elements in particular sought in the representation fall within the remit of planning. Inclusion of these requirements gives residents unrealistic expectations of what falls within the remit of planning (which has a statutory requirement to not duplicate matters addressed by other legislation) and the level of enforcement it has against should development not be in accordance with the assessments, or despite the assessments being followed there is still structural failure affecting neighbours.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.1 Design	BD3	Eric Cliff	Basement planning applications should be subject to a basement impact assessment at the application stage which would require an independent assessment of a basement scheme's impact on drainage, flooding, groundwater conditions and structural stability.	The concern about impacts on neighbours, particularly those sharing a party wall with a basement development is understood. The approaches mentioned by other councils were considered at the time the Council produced its Basement SPD. Notwithstanding other boroughs' approaches, where the scale of basement developments are in comparison to Brent very large, the Council does not consider that the structural elements in particular sought in the representation fall within the remit of planning. Inclusion of these requirements gives residents unrealistic expectations of what falls within the remit of planning (which has a statutory requirement to not duplicate matters addressed by other legislation) and the level of enforcement it has against should development not be in accordance with the assessments, or despite the assessments being followed there is still structural failure affecting neighbours.	No Change.
6.1 Design	BD3	Mary Duffy	Do not support tall buildings as they reduce the quality of the environment.	Noted. The London Plan has set Brent a significant housing target. Brent has limited brownfield land available which can bring forward sustainable development. Therefore in order to meet this requirement it is essential that existing sites are optimised with higher densities. The approach taken has been to concentrate taller buildings in areas seen as appropriate for higher development so as to limit their impact across the borough. This is supported within the London Plan. Our approach is evidenced within the Tall Building Strategy. Tall buildings will be subject to stringent design policies, only being considered acceptable if they are of high quality design.	No Change.

6.2 HOUSING

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.2 Housing	Para 6-2-12- 6-2-13	Quintain	Concerns regards HMOs set out in paragraphs 6.2.12 and 6.2.13 are noted. Purpose built, well-managed and high quality build to rent developments such as Wembley Park HMOs play a vital part of the in the local housing Market. The local plan should make this distinction. This will reassure build to rent developers of the council's position on HMOs in such developments. Amendments: 6.2.12 “...Whilst they do Where such accommodation is purpose built, well managed and high quality it provides a valuable role in meeting housing need and will be supported. However where this is not the case their concentration can sometimes have adverse impacts on neighbours....” 6.2.13 “...Nevertheless, the council is likely to go through the process of removing permitted development rights for change of use to HMOs to come into effect in 2020.”	Supporting the provision of a quality product is agreed to be a worthwhile outcome. Nevertheless, the Council still considers it appropriate to support balanced and mixed communities. The renting out of properties to sharers also distorts the market for non-sharers as it inflates residential rents for 2 or more bed dwellings above those which single households would be willing/ are able to spend.	6.2.12 “... ~~Whilst they do~~ Where such accommodation is purpose built, well managed and high quality it provides a valuable role in meeting housing need and will be supported. However where this is not the case their concentration can sometimes have adverse impacts on neighbours. HMOs can also push up rents or inflate the price of properties for sale that would otherwise accommodate families.”
6.2 Housing	Para 6-2-12- 6-2-13	Quintain	Reference to the proposed Article 4 Direction removing C4 permitted development rights is not considered necessary or relevant to the Local Plan and should therefore be deleted.	The progression of the Article 4 is factual and it has been 'made' on 21st October 2019. Approval will be sought to confirm an article 4 in due course.	No Change.
6.2 Housing	Para 6-2-27	John Cox	Vacant building credit. DNLP policy H9(A) is unlikely to bring forward additional development in London, and therefore is unlikely to be appropriate in this context. However, in some circumstances it may provide an incentive for development on sites containing vacant buildings which would not otherwise come forward. The panel has suggested its deletion as it would be contrary to national policy. Justification for this is the significant housing need (incl. affordable housing), and past delivery without the VBC, indicating land will come forward without this incentive. Whilst the need for affordable housing is acute and the potential impact of VBC significant, these circumstances are likely to apply to most large urban areas. There is also insufficient evidence of the impact of disapplication of VBC across London to justify the departure from NPPF. If boroughs wish to do so, they can based on local evidence as the London Plan may not. Therefore the Brent Local Plan should provide such evidence.	Noted. To date the Council has had no applications for Vacant Buildings Credit. It is considered that the likelihood of this being a significant issue that merits a policy at this stage is unlikely.	After paragraph 6.2.27 under London Plan heading amend: “ ~~Policy H9 Vacant Building Credit~~ ”.
6.2 Housing	BH1	Quintain	We await panel recommendations in relation to London Plan housing targets for Brent and how the Local Plan will reflect this.	Noted. The Brent Local Plan will be amended to now identify the London Plan target 23,250 dwellings as the minimum that will be delivered in the period 2019/20-2028/29.	None specific to this representation. Policy BH1 will however be amended to identify the London Plan target 23,250 dwellings as the minimum that will be delivered in the period 2019/20-2028/29.
6.2 Housing	BH1	Angela Barrett	Development should take place on existing substandard sites rather than parkland / greenfield. We did not choose to live in Brent to be surrounded by builds and high rises. Brent's open, suburban character is at risk and higher population will result in lower quality of life and pressure on pollution and transport.	Proposed development on greenfield land is very exceptional and is part of a wider consolidation of open space and its replacement, which will overall increase the quality/ function of that open space, e.g. in Northwick Park or South Kilburn. Tall buildings are required to meet the housing needs of the growing population of the borough, that the Council must	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
				plan for, the majority of the borough will however remain low rise and suburban in character.	
6.2 Housing	BH1	Daniel Hulsmann	London Plan housing targets have been revised down. The new Plan should reflect this revision. Extreme housing densities impact local amenity and green spaces.	It is recognised that the strategic policy context represented through the London Plan has been going through change. The Brent Local Plan will be modified prior to adoption to reference the content of the final version of the London Plan.	None specific to this representation. Policy BH1 will however be amended to identify the London Plan target 23,250 dwellings as the minimum that will be delivered in the period 2019/20-2028/29.
6.2 Housing	BH1	Woolbro Homes	Support intention to maximise the opportunities to provide additional homes in the period 2041 and beyond. In particular, support focus on growth areas and site allocations (such as Alperton and BSWSA6). This will assist with achieving sustainable development, by focussing development in a sustainable location as well as maximising effective use of previously developed land (NPPF 2019, para. 8).	Support welcomed.	No Change.
6.2 Housing	BH1	GLA	Policy BH1 diverges from the draft new London Plan housing target of 29,150 to deliver 27,482 homes between 2019 and 2029. The Panel's Report recommended Brent's housing target is 23,250 dwellings up to 2029. While the outcome of this matter is yet to be determined, it is recognised that the suggested housing target of 2,748 homes a year up to 2029 is from its housing trajectory, which is included as an appendix.	Noted. The Council is proposing to amend Policy BH1 to take account of the Intend to Publish Version of the London Plan and seek to deliver a minimum of 23250 dwellings in the period 2019/20 - 2028/29.	Amend BH2 to "...to provide a minimum ~~27,482~~ <u>23,250</u> homes in the period 2019/20-2028/29...."

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.2 Housing	BH1	Innovative Infill	Housing policy deviates from London Plan in a manner which is not justified, and which undermines the effectiveness of delivery of housing. Housing Delivery Targets on Small Sites Paragraph 6.2.17 argues the Brent policy context to date was ‘generally supportive of small site delivery,’ resulting in the delivery of 260 new homes per annum. Review of historic Brent planning applications reveals almost none were specifically consented on suburban / metroland infill sites. Indeed, very few applications were received compared to other Boroughs with a similar suburban context. This reflects the chilling effect of previously restrictive policies such as CP17. As such it is not represent reliable evidence as to the small site capacity in a future, more permissive policy context. Watering-down of London Plan policy H2A. Brent’s proposed deviation from London Plan targets for small sites deviates from regional planning policy without sufficient justification and hence represents a threat to the soundness of the plan. Site allocations process The approach to identifying and allocating housing sites ignores the conventional suburban typology. Small-sites targets would be more achievable if this had been investigated more closely, e.g. examining redevelopment of mews-lane garage sites within the inter-war suburbs. The allocations process should seek to identify at least one suitable area where such a mews lane development could be permitted, as a test-bed for future rounds of allocations, and as a means to improve the effectiveness of the plan. Self- and Custom-Build The council notes its statutory duty to support self- and custom-build, but has not followed this with an active commitment to encouraging such developments. The brownfield register by its nature does not capture many of the smaller, privately owned, domestic scale plots, generally in suburban infill settings, which are highly appropriate to small-scale self-build projects. Amending BH4 to reflect a positive and permissive approach to small sites across the residential suburbs will assist in improving the availability of plots suitable for the self- and custom-build market. Changes in residential density Parts of the borough face challenges of overcrowding and excessive intensification of occupation due to subdivision, ‘beds-in-shed,’ etc. Decreasing average household size in the context of a fixed stock of housing in some more affluent areas means that population density within some established residential suburbs is actually falling. This results in less effective use of existing community infrastructure and assets. CSO mapping of intra-census changes in residential density at local level should form part of the evidence base for this (and many other) policies, but does not appear to have been included in the published evidence base. Failure to take account of such statistical data represents a threat to the soundness of the plan. Amending Brent’s policy BH4 to reflect a positive and permissive approach to small sites across the residential suburbs may improve utilisation of existing public infrastructure and assets and contribute to the social sustainability of existing communities.	The revised London Plan sets a lower small sites housing delivery target. There is no longer a policy of the type of CP17 being taken forward in the Brent London Plan, consequently this provides greater opportunity for change. SPD1 provides flexibility subject to respecting local character. The Council is likely to produce an update to this to better deal with promoting small site development and intensification corridors. Guidance can go into greater detail on acceptable intensification solutions, better promoting opportunities to maximise capacity in those areas with greater access to public transport.	As the draft London Plan policy H2A has been removed from the Mayor's Intend to Publish version, it is proposed that BH4 is updated to provide the policy for promoting small site development in the borough (see proposed change to BH4 below).

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.2 Housing	BH1	Robin Sharp	The fact that Brent is not an island, but part of a dynamic international city, should be referenced in Brent's Characteristics. Land use planning is vital in ensuring the multiplicitous requirements of a city are balanced harmoniously. The Plan puts too much weight in the DNLP's projected housing figures, anticipating growth of 2 million to 2040. It is not environmentally or socially sustainable for Brent to absorb 60,000 more people and will negatively impact the health, and quality of life of the populace. Support objection to London Plan housing targets. If such targets are to be met sustainably, then the necessary infrastructure will be required, including schools, colleges, surgeries, and hospitals. These targets, in association with delayed infrastructure provision, will increase commuting for employment and education. Appropriate greenspace is also needed. Brent cannot sensibly accommodate an extra 60,000 people (equivalent size of a small town) and should not plan too.	Reference is made to wider London in paragraph 3.5 and through other parts of the Brent characteristics section. The Plan has to be consistent with national planning policy, which means planning to meet the estimated population's needs, which in Brent's case are projected to grow significantly, this would be the case even if a regional plan in the form the London Plan was not in place. The Council cannot ignore the fact that it has to plan to meet these needs. To do so would result in poorer outcomes in all respects.	No Change.
6.2 Housing	BH1- BH2	TfL Commercial Development	Policy should include transport hubs and sites with high public transport accessibility within appropriate sites for housing in BH1, as required by DNLP policy H1. These sites are well located, often with high capacity and should be optimised and supported within policy. BH2 should also identify these locations as areas which will support new housing. It is noted within paragraph 6.2.33, but not within the policy itself.	Areas with higher levels of public transport accessibility are in national and London Plan policy are identified as priority locations for more intensive development. As identified, the supporting text in 6.2.33 identifies these locations are priority areas for the provision of new homes. As such it is considered appropriate to amend the policy to incorporate this.	Amend Policy BH2 to: "edge of town centre sites, <u>areas with higher levels of public transport accessibility levels</u> , and intensification..."
6.2 Housing	BH1- BH4	Innovative Infill	Policy BH1 identifies the majority of housing delivery is focused in Development Areas (comprising site allocations, growth areas and intensification corridors). These are only a small fraction (12-15% by estimate) of the borough. The fewer residents of these areas are asked to bear the burden of dramatically increased density. Those privileged to live in the remaining low density areas are insulated from change. The latter substantially comprises private owner-occupiers, whereas the former include a greater proportion of renters and residents of HMOs. The evidence base is potentially deficient in that the Inclusive Growth Strategy and the Equalities Impact Assessment neither identify nor justify such embedded inequity, undermining the soundness of the plan.	The Plan seeks to place development in the most sustainable areas possible where there is or will be good public transport links, which will fundamentally limit the amount of movement by private car, plus the intensity of development and its location means that residents will have access to services, thus reducing the distance that they need to travel for everyday activities. Even if there were equalities impacts, which given that many of the larger lower density homes are occupied by extended families principally formed from BME groups who need larger homes to meet their needs, is debateable, the promotion of significant amounts of development in areas with poor access to public transport is not a sustainable option consistent with national and London Plan or Brent policy.	No Change.
6.2 Housing	Para 6-2-36	Quintain	Object as not justified. Requirement may prevent developments coming forward. Should be amended as follows: 'In very exceptional circumstances the council might accept wholly residential schemes without the development meeting tests related to need/ likely occupation. This might be for instance where an existing use is a 'bad neighbour' / 'non-conforming' use which is undermining the amenity of an area, or re-provision of such uses is shown to undermine viability of a scheme. In these types of cases the applicant would have to show that the problems could not be addressed	The proposed amendment is not considered appropriate. The policy and justification provides sufficient flexibility, whilst seeking to ensure existing non-residential uses are included in residential developments. Criterion b) of the policy would allow for the benefits of the development as a whole to be considered if re-provision was not occurring through evidenced viability issues. Giving too much flexibility will push up land values, and therefore is more likely to affect scheme viability where re-provision might otherwise be viable.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
			through its redesign or suitable conditions attached to a planning permission to overcome those adverse effects.'		
6.2 Housing	BH2	Sudbury Town Residents Association	Brent is pursuing a housing allocation (35,000) in excess of that required by the Mayor (29,500 or 24,000). Demolition of 2-3 storey homes and commercial properties and replacement with 5-7 storey buildings in Intensification Corridors is in conflict with the Sudbury Town Neighbourhood Plan ("STNP"). Any policy which supports development of Vale Farm as a regional centre for sports excellence is in conflict with STNP Policy VF1. The classification of A404 Harrow Road, Watford Road and Ealing Road as principal movement corridors, is misleading. The roads are often heavily congested, not wide and do not have the space for increased density. Bus and emergency services often have difficulty passing through.	The target set by the Mayor is a minimum, which the borough will seek to achieve. Although the London Plan housing target has reduced, the amount of housing that Brent has identified in its housing trajectory provides a buffer that gives greater confidence that the minimum London Plan target will be met. The intensification corridors are not in conflict with the Sudbury Neighbourhood Plan which contains no policies that address Sudbury's existing character. The Sudbury Neighbourhood Plan in Policy VF1 states "The Plan supports development that results in the strengthening of Vale Farm as a regional centre for sports excellence." which is what the Brent Local Plan acknowledges. 'A' main roads, the Harrow, Watford and Ealing Roads are principal movement corridors that have good levels of public transport. In these locations the Council would seek to reduce on-site parking and probably support car-free development. As such development could well reduce the amount of private cars using these roads by residents compared to the existing properties.	No Change.
6.2 Housing	BH2	DTZ Investors	Object as: Not sufficiently flexible, and is not positively prepared, justified or consistent with national policy. Should be amended as follows: 'Within town centres, edge of town centre sites and intensification corridors where existing non-residential floorspace forms part of a site proposed for residential development, the council will ~~require~~ support the re-provision of the same amount and use class of non-residential floorspace. Exceptions to this will be where it can be shown that: a) the site is allocated or has planning permission for an alternative use(s); b) a) there is no need for it or reasonable prospect of its use if provided; or c) b) in exceptional cases that its loss is outweighed by the benefits that its replacement with residential floorspace will bring.' The second part of the policy is not related to the policy heading. It could conflict with site allocations for previously developed sites. It is extremely inflexible and could stymie development contrary to the tests of soundness. It would also conflict with NPPF impact and sequential retail tests.	It is considered that a proposed amendment from "require" to "support" would weaken the policy and likely result in potential loss of uses that create mixed use environments/ can provide opportunities for community and lower value uses to be provided in new development, resulting in sterile mono-use (probably all residential) developments. In relation to the new proposed criterion a) this is considered to be an acceptable amendment that clarifies the status of existing consents and allocations compared to existing use. The removal of "in exceptional cases" is not considered appropriate. Again it waters down the policy to such an extent that it is likely to more often than not result in the loss of non-residential uses.	Amend policy BH2 to add a new criterion to the exceptions: " <u>a) the site is allocated or has planning permission for an alternative use(s);</u> "
6.2 Housing	BH2	St. George	Object as: not sufficiently flexible, not positively prepared, justified, effective, or consistent with national policy. Proposed modifications: "Within town centres edge of town centre sites and intensification corridors....Exceptions to this will be where it can be shown that:a) the site is allocated for an alternative use(s) or has planning permission for an alternative use(s);b) a) there is no need for it or reasonable prospect of its use if provided; or c) b) in exceptional cases	The edge of town centre sites are considered appropriate for inclusion as they are likely to be along busy streets and will add to the vitality of the street scene. Retention of space provides the opportunity to meet local non-residential needs unless the exceptions in the policy indicate that it is not necessary/ desirable to retain the space.In relation to the new proposed criterion a) this is considered to be an acceptable	Amend policy BH2 to add a new criterion to the exceptions: " <u>a) the site is allocated or has planning permission for an alternative use(s);</u> "

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
			that its loss is outweighed "Reasoning: Policy second part does not appear to reflect the policy intent and its purpose is therefore questionable. It would conflict with site allocations for previously developed sites, where the allocation is for an alternative use, and where planning permission has been granted in whole or part for alternative uses. The policy sets out exceptions and should not include exceptions.	amendment that clarifies the status of existing consents and allocations compared to existing use. The removal of "in exceptional cases" is not considered appropriate. It would water down the policy to such an extent that it is likely to more often than not result in the loss of non-residential uses.	
6.2 Housing	BH2	Quintain	Object as not justified. Does not allow for the impact of viability on re-provision of non-residential floorspace and should therefore include an additional point stating: 'c) where this requirement would detrimentally impact upon the viability of the scheme.'	The proposed amendment is not considered appropriate. The policy and justification provides sufficient flexibility, whilst seeking to ensure existing non-residential uses are included in residential developments. Criterion b) of the policy would allow for the benefits of the development as a whole to be considered if re-provision was not occurring through evidenced viability issues. Giving too much flexibility will push up land values, and therefore more likely to affect scheme viability where re-provision might otherwise be viable.	No Change.
6.2 Housing	BH2- BH4	GLA	Welcome the general approach to growth. On small sites housing, the draft new London Plan panel's report recommendation is that the borough's target be reduced by approximately two thirds. The Mayor's final proposed approach will be set out in his Intend to Publish version of the new London Plan.	Noted. The Council welcomes the changes to the London Plan with regards to the reduction of the small sites housing target.	No Change.
6.2 Housing Page 701	BH3	DTZ Investors	Object. Onerous and places unreasonable pressure on developers who may not have a build to rent business model. This is not the role of the Local Plan. The plan provides no evidence that build to rent developments would increase delivery, as is dictated by the market just like build for sale. Policy should be amended as follows: 'To encourage increased housing delivery, within each Growth Areas (excluding South Kilburn), or development sites of 500 dwellings or more, the provision of Build to Rent properties will be expected will be supported where unless this would not:	Build to rent is a product that assists in meeting housing needs for rented accommodation, but also has the ability to rapidly increase housing delivery as it is not so dependent on sales which can be affected by the economic cycle or market saturation. The policy is essentially trying to increase the likelihood of sites becoming available to deliver build to rent which historically has been unable to compete on purchase of sites with traditional house builders. This has been sought by organisations such as the British Property Federation which has been highly supportive of build to rent in increasing housing delivery. The exceptions provided within the policy provide the flexibility to ensure that the delivery of market housing sites is not compromised where build to rent is not a viable proposition.	No Change.
6.2 housing	BH3	Wembley Towers Limited	Policy is restrictive and ultra vires. A Plan can support various housing models, but not dictate a type of model and preclude others. It is for the market to decide. Whilst Build to Rent support is welcomed, the demands of the demands are unsuitable. The policy is unsound and inconsistent with national policy in the context of Planning Policy Guidance (Paragraph: 001 Reference ID: 60-001-20180913). It should recognise circumstances and locations where these developments will be encouraged, e.g. as part of large sites and/or a town-centre regeneration area. The policy should acknowledge other forms of residential accommodation which can add to the housing stock and meet local demand, such as co-living accommodation. Amend BH3: 'To encourage increased housing delivery, within each Growth Areas (excluding South Kilburn) or development sites of 500 dwellings or	Build to rent is a product that assists in meeting housing needs for rented accommodation, but also has the ability to rapidly increase housing delivery as it is not so dependent on sales which can be affected by the economic cycle or market saturation. The policy is essentially trying to increase the likelihood of sites becoming available to deliver build to rent which historically has been unable to compete on purchase of sites with traditional house builders. The exceptions provided within the policy provide the flexibility to ensure that the delivery of market housing sites is not compromised where build to rent is not a viable proposition. Clearly there are many forms of housing development that will assist in delivery including co-living, however to date and in terms of investor	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
			more, the provision of Build to Rent properties will be expected encouraged unless this would:....'	interest, Build to Rent provides the ability to make a step change, with a high quality product hence the policy focus.	
6.2 Housing	BH3	St. George	Current policy is onerous, placing unreasonable pressure on developers (who may not have a Build to Rent business model) to deliver this alternative product. The policy wording potentially will result in delivery of a poor-quality product, in turn restricting housing delivery. The Local Plan should not dictate on Build to Rent but incentivise developers in its delivery.	Build to rent is a product that assists in meeting housing needs for rented accommodation, but also has the ability to rapidly increase housing delivery as it is not so dependent on sales which can be affected by the economic cycle or market saturation. The policy is essentially trying to increase the likelihood of sites becoming available to deliver build to rent which historically has been unable to compete on purchase of sites with traditional house builders. The exceptions provided within the policy provide the flexibility to ensure that the delivery of market housing sites is not compromised where build to rent is not a viable proposition.	No Change.
6.2 Housing	BH3	TfL Commercial Development	Support provision of Build to Rent schemes, but policy wording is too inflexible. Provides no support for schemes suitable for Build to Rent that may be smaller in size than the 500 units specified. It also fails to recognise that there may be requirements for other forms of housing on sites of over 500 units. As currently drafted, the policy wording does not reflect Paragraph 6.2.38. To be considered sound, amend policy from "expected" to "supported" to provide greater flexibility and align with paragraph 6.2.38. These changes are also required if the draft Local Plan is to be considered sound.	The policy justification identifies that build to rent is considered a valuable addition in terms of increasing the capacity of the development sector build new homes and that the Council is keen to encourage its provision. This can be added to the policy to provide clarity on this matter. The need to provide alternative forms of housing is recognised and the policies of the Plan as a whole will be taken into account when considering what planned developments are delivering. The use of "support" is not considered robust enough to open up opportunities for built to rent development.	Insert new sentence at beginning of Policy BH3 to " <u>The provision of Build to Rent development as defined within London Plan Policy H11 will be supported within Brent.</u> To encourage..."
6.2 housing	BH3	Stonebridge Real Estate Development	Policy is restrictive and ultra vires. A Plan can support various housing models, but not dictate a type of model and preclude others. It is for the market to decide. Whilst Build to Rent support is welcomed, the demands of the demands are unsuitable. The policy is unsound and inconsistent with national policy in the context of Planning Policy Guidance (Paragraph: 001 Reference ID: 60-001-20180913). It should recognise circumstances and locations where these developments will be encouraged, e.g. as part of large sites and/or a town-centre regeneration area. The policy should acknowledge other forms of residential accommodation which can add to the housing stock and meet local demand, such as co-living accommodation. Amend BH3: 'To encourage increased housing delivery, within each Growth Areas (excluding South Kilburn) or development sites of 500 dwellings or more, the provision of Build to Rent properties will be expected encouraged unless this would:....'	Build to rent is a product that assists in meeting housing needs for rented accommodation, but also has the ability to rapidly increase housing delivery as it is not so dependent on sales which can be affected by the economic cycle or market saturation. The policy is essentially trying to increase the likelihood of sites becoming available to deliver build to rent which historically has been unable to compete on purchase of sites with traditional house builders. The exceptions provided within the policy provide the flexibility to ensure that the delivery of market housing sites is not compromised where build to rent is not a viable proposition. Clearly there are many forms of housing development that will assist in delivery including co-living, however to date and in terms of investor interest, Build to Rent provides the ability to make a step change, with a high quality product hence the policy focus.	No Change.
6.2 Housing	BH3	Quintain	Object as should be expanded to provide guidance on how BtR developments will be considered in terms of residential amenity and design. This would encourage innovation and differentiation. Should therefore include the following text in support of policy: 'Build to Rent is a new and evolving sector within the residential market which the Council wish to encourage. The Council will work closely with Build to Rent providers to ensure schemes are delivered that provide high quality residential environments. In exceptional circumstances the Council may be willing to consider a differentiation to the normal residential standards where it can be justified by the developer and	The Council is not convinced with the premise that Build to Rent development should be subject to different standards compared to those that would apply to standard housing developments. Renting is now the de-facto tenure for a significant proportion of the population, with tenants likely to stay many years in one property where for instance they have a need to remain in an area (for example for their children's education), rather than be subject to short term change. In addition, schemes can be subject to a minimum 15 year covenant, meaning there is the potential for them to change to owner-occupied properties in the longer-run.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
			balanced against other qualities of the development and meeting housing needs.'		
6.2 Housing	BH3	John Cox	Given the overwhelming need for social rent homes, and the increasing numbers of approved Build to Rent developments with no 'low cost' rent at all, schemes are failing to meet the most pressing housing need. The Local Plan's requirement for BtR developments to provide 100% of their 'affordable' housing as LLR should be changed. A significant proportion should be social rent. Why didn't the viability assessment test this? It needs to be tested going forward to enable Brent to meet its housing need and sustain a mixed community. Other boroughs have taken this step. the DNLP allows boroughs to require low cost rents such as social rent.	The sentiment of this representation is understood as social rent levels are identified in the West London SHMA as the predominant ones at which dwellings can be truly regarded as affordable to meet Brent's needs. The London Plan policy of offering the fast track approach creates limitations on what the Council can seek, as the policy has to be deliverable, which means tailoring tenures to ensure this is the case. The 100% London Living Rent does this. Low wage levels in Brent mean that although not at the level of social rent across the borough, London Living Rent levels in some areas do have a significant discount on normal rent levels. In some areas in Brent London Living Rent levels are below the equivalent London Affordable Rent levels. For example for a 1 bed flat in Wembley the London Living Rent 2019/20 is benchmarked at £661 per month, whilst the London Affordable Rent for the equivalent property is £672. Policy BH5 allows for social rent level rents to be offered where this is being proposed by the applicant where they are lower than London Living Rent, as it states "as a minimum". This wording is however clumsy and could perhaps be clarified with better wording. For sites subject to negotiation as they will not meet the fast track approach, the Council can discuss with applicant how rental levels can best meet needs. In some cases this may result in social rent levels being delivered, but to offset this either the number of affordable dwellings will drop, or more affordable will have to be at sub-market (max 80% of market rent).	Policy BH5 amend: "Build to Rent developments, a minimum of 100 per cent at London Living Rent equivalent rents or lower "
6.2 Housing	BH4	Innovative Infill	Brent Plan Policy BH4 seeks to restrict draft London Plan Policy H2A's presumption in favour of development to areas of PTAL 3-6, removing the 800m radius from stations and town centre boundaries. This subtle deviation significantly subverts its spirit. It reduces by over 50% the policy applicable area. Justification as set out in Paragraphs 6.2.50 and 6.2.51, is deficient. Brent's suburban characteristics are similar to those found throughout outer London. The GLA would have been aware of this in its policy development. The 800-metre radius from train stations and town centres is a compromise in place a previously more widely permissive policy, and achieves a perfectly reasonable balance between sustainable and unsustainable travel. Brent's policy is arbitrary; discounting what is in fact relatively easy short distance from rail stations. The council criticises H2A as a 'blunt tool' but replaces it with an equally blunt alternative. Brent's policy should be informed by specific local evidence as to why the 800m permissive radius should not apply to a specific station or centre. In summary, the justification for deviating from the London Plan: a) fails to distinguish between small sites of different types and contexts b) seeks to perpetuate past policies which insulate the residential suburbs in their generality from any change or intensification c) attempts to drastically curtail the areas where the newly permissive regime will apply d) rests on an arbitrary change to qualifying parameters which is	Policy H2A has been removed from the draft London Plan, taking account of the Panel recommendations, who considered it inappropriate for application across all London. The Council has a positive attitude towards small site development, particularly where it has good access to public transport. Its policies such as the identification of the intensification corridors indicate that it is supportive of changes in character to accommodate new homes in areas with access to transport and facilities. The tall buildings policy also allows for taller buildings within an existing suburban context up to 2 storeys in height taller than the prevailing character, which will assist in allowing more intensive use of sites occupied by existing dwellings.	As the draft London Plan policy H2A has been removed from the Mayor's Intend to Publish version, it is proposed that BH4 is updated to provide the policy for promoting small site development in the borough.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
			not supported by evidenceAnd therefore falls short of the standard of soundness required of this Plan.		
6.2 Housing	BH4	Innovative Infill	Some parts of the borough face challenges of overcrowding and excessive intensification of occupation due to subdivision, ‘beds-in-shed,’ etc. Decreasing average household size means population density within many established residential suburbs is actually falling. This results in less effective use of community infrastructure and assets. Intra-census changes in residential density at local level should form part of the evidence base for this (and many other) policies. Failure to take account of such statistical data represents a threat to the plan’s soundness. Amending BH4 to reflect a positive and permissive approach to small sites across the residential suburbs may improve utilisation of existing public infrastructure and assets and contribute to the social sustainability of existing communities.	Whilst population density across the UK may well be falling, in Brent this is not the case. Overall increases in population in the borough mean that populations in all wards are increasing and thus existing infrastructure is not at risk of being under-utilised to such an extent that it is regarded as a wasted resource. The West London Small Sites SHLAA showed that across most of the borough there was a significant degree of over-crowding when taking into account conventional measures (e.g. persons per room).	No Change.
6.2 Housing	BH4	Innovative Infill	The approach to identifying and allocating housing sites avoids the conventional suburban typology. The London Plan small-sites targets would be more achievable if this typology had been investigated more closely. Examples include redevelopment of mews-lane garage sites within the inter-war suburbs. This offers potential for significant capacity. Such housing was standard in Georgian, Victorian and Edwardian periods. Allocations should seek to identify at least one suitable area as a test-bed for future rounds of allocations, and as a means to improve the effectiveness of the plan.	The opportunities for this type of development in Brent appear to be limited. Gardens predominantly are not long, which limits desire of people to reduce them in size, to open up the sites demolition of properties would be required, plus the appropriate development solution, e.g. low rise is unlikely to generate significant value, compared for example frontage development identified in the intensification corridors.	No Change.
6.2 Housing	BH4	GLA	Noted that Brent is maintaining its challenge against the Mayor’s approach to small housing sites. The London Plan Panel Report recommends the removal of Policy H2A of the draft London Plan. Brent suggests at paragraph 6.2.39 that it is able to deliver approximately 370 new homes a year through small site developments. The Panel report recommends that Brent’s small housing site target for the period 2019 to 2029 is 433 dwellings a year. The Mayor will send out an updated letter or set out his approach on this matter through a Statement of Common Ground following the publication of his Intend to Publish version of the new London Plan.	The updated target reflecting the Panel's recommendations is understood, although compared to the analysis done for Brent this revised target is still challenging. This part of the draft Brent Local Plan will be updated to reflect changes in circumstance related to the emerging London Plan.	As the draft London Plan policy H2A has been removed from the Mayor's Intend to Publish version, it is proposed that BH4 is updated to provide the policy for promoting small site development in the borough.
6.2 Housing	BH4	Innovative Infill	The council has not followed its statutory duty with an active commitment to encouraging self-build developments. The brownfield register does not capture many of the smaller, privately owned, domestic scale plots, generally in suburban infill settings, which are highly appropriate to small-scale self-build projects. Amending BH4 to reflect a positive and permissive approach to small sites across the residential suburbs will assist in improving the availability of plots suitable for the self- and custom-build market.	The Council has now published on its website a full list of sites not yet developed with planning permission for less than 5 dwellings which are not already identified in the brownfield register. This list will be updated annually. It shows over 300 sites which will assist those who are keen to pursue a self or custom build and provides many opportunities for what in Brent appears to be a relatively small need.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.2 Housing	BH4	Innovative Infill	Hundreds of garage, corner and side garden plots exist across the Borough. Many have potential for one or two dwellings without detriment to garden land or residential amenity. The time and effort required to bring such sites forward is considerable, and undermined through zealous application of the entire gamut of planning policies devised with larger developments in mind. Positive reference to the principle of appropriately designed, small-scale infill development on sites across the Borough is required. This can improve housing mix and choice without detriment to the character of local residential areas. Specific design guidance to define acceptable patterns of development. It can acknowledge the sensitivity and character of the context where these developments are likely to come forward. This will provide greater clarity and assist in unlocking the potential of small plots. Policy BH4 should commit to producing supplementary planning guidance on this matter in the near future to improve the effectiveness of the plan.	There will be sites and despite the presence of Policy CP17 these sites have come forward. CP17 will no longer form part of the Plan on adoption of this Plan which might better improve prospects in addition to a revised BH4 required in the absence of London Plan Policy H2A which is no longer being taken forward.	As the draft London Plan policy H2A has been removed from the Mayor's Intend to Publish version, it is proposed that BH4 is updated to provide the policy for promoting small site development in the borough.
6.2 Housing	BH4	Historic England	Draft new London Plan Policy H2 has been amended resolving Historic England's previous concerns. Please clarify that the draft Brent Plan commitment to policy H2 is the amended version.	The Council due to the removal of Policy H2A and amendment of policy H2 has decided to write an enabling, rather than a presumption in favour policy.	As the draft London Plan policy H2A has been removed from the Mayor's Intend to Publish version, it is proposed that BH4 is updated to provide the policy for promoting small site development in the borough. This will be set out in the schedule of modifications that will be submitted with the Plan for examination.
6.2 Housing	BH4	Angela Barrett	Too many people already.	The Council has to plan to accommodate predicted growth in population.	No Change.
6.2 Housing	BH4	Innovative Infill	By restricting the presumption of areas of PTAL 3-6 and removing the 800m radius from stations and town centre boundaries as set out in the London Plan, Brent's Local Plan Policy BH4 subverts the spirit of London Plan Policy H2A and reduces by over 50% the suburban area where this policy is applicable. The Council's justification for this deviation is deficient. The suburban context of the northern part of the borough is not exceptional across outer London Boroughs and 800m radius is a compromise in place of previously more widely permissive policy, achieving a balance between sustainable intensification and discouraging unsustainable travel patterns. Brent's higher bar fails to recognise the value of close proximity to one of the borough's rail stations or urban centres which is already embedded in London Plan policy. Any deviation should be a local exception and must be evidence-based. In summary, Brent's justification for deviation from the London Plan a) fails to distinguish between the different contexts of small sites; b) insulates suburbs from change by perpetuating past policies; c) curtails areas where the new permissive regime will apply; d) is based on arbitrary changes to qualifying parameters not supported by evidence. The plan is therefore not sound. Hundreds of potential small residential infill sites exist across the borough but the time / effort required to bring forward these sites	The Panel stated in considering policy H2A, "...Furthermore, there is insufficient evidence to treat all forms of residential development across all of London within PTALs 3-6 or within 800m of a station or town centre boundary as acceptable in principle." Whilst in inner London there might well be reasons why someone might not seek to own/ use a car if located up to 800 metres from a station, or Town Centre (although in reality most are likely to be at least within PTAL 3, such as in the southern half of Brent) use of public transport in these types of locations is very low with residents being heavily car dependent. To promote development in these locations is likely to lead to large increases in private car use to the detriment of environmental quality and personal health.	As the draft London Plan policy H2A has been removed from the Mayor's Intend to Publish version, it is proposed that BH4 is updated to provide the policy for promoting small site development in the borough.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
			can be outweighed by policies devised with larger developments in mind. Positive reference should be made to the principle of appropriate, small-scale infill across the borough. Policy BH4 should commit the council to creating specific design guidance to in relation to this.		
6.2 Housing	BH5	St. George	Object as the policy is not sufficiently flexible, not effective or consistent with national policy. Ambiguity within the policy should be rectified by an explicit acknowledgement that Brent Council is adopting the Threshold approach to Planning Applications. The Threshold approach can be explained within the policy or within the justifying text. The supporting text acknowledges that the proposed affordable housing target and mix is extremely challenging to achieve, and should therefore greater flexibility should be applied within the policy. The policy should directly support the Built to Rent principles of Policy BH3 by making it clear that Built to Rent will be treated comparably to traditional market for sale products in relation to affordable housing. Proposed modification: In Brent the strategic affordable housing target that will apply is 50% of new homes in the period to 2041. Brent Council will adopt the Threshold approach to Planning Applications. The affordable housing tenure split required to comply with London Plan Policy H6 Threshold Approach to Applications is as follows (unless an alternative mix is robustly justified through viability evidence): Non-Built to Rent developments of 10 dwellings or more is: a) 70 per cent Social Rent/ London Affordable Rent and; b) 30 per cent intermediate products which meet the definition of genuinely affordable housing, including London Living Rent, affordable rent within Local Housing Allowance limits and London Shared ownership. These must be for households within the most up to date income caps identified in the London Housing Strategy or London Plan Annual Monitoring Report. Where viability evidence demonstrates major developments are unable to achieve the target affordable housing mix, a monetary planning obligation may be secured or an alternative tenure mix. For Build to Rent developments the affordable housing provision should be agreed on a case by case basis. Affordable Build to Rent homes will be counted as making a comparable contribution to Brent's affordable housing target.	As Policy H5 of the draft London Plan will become part of the development plan on its adoption, by default the Mayor's threshold approach will apply. Nevertheless, additional clarity can be provided in BH5. Consistent with national and London Plan policy, provision of affordable housing is sought on site, with contributions in lieu being exceptions. The policy justification indicates that the Council's preferred tenure mix will be sought where the viability assessment route is followed, rather than an alternative mix that seeks to push up the percentage affordable attained. For build to rent, to be consistent with the London Plan the Council has to set out a tenure mix to support the fast track approach. Where affordable build to rent homes are providing rental levels consistent with affordable housing rental levels they will be regarded as delivering affordable homes.	Amend BH5 to: "...in the period to 2041. <u>London Plan Policy H5 Threshold Approach to Applications will be applied.</u> The affordable housing..."
6.2 Housing	BH5	GLA	The intention to follow the strategic draft London Plan target for the delivery of 50% affordable homes and the Threshold Approach as set out in Policy H6 is welcomed. Policy BH5 should make it explicitly clear that it will apply the Mayor's affordable thresholds below which viability assessments will no longer be required to support residential development proposals and with early and late stage reviews for schemes that do not achieve the threshold.	As Policy H5 of the draft London Plan will become part of the development plan on its adoption, by default the Mayor's threshold approach will apply. Nevertheless, additional clarity can be provided in BH5.	Amend BH5 to: "...in the period to 2041. <u>London Plan Policy H5 Threshold Approach to Applications will be applied.</u> The affordable housing..."
6.2 Housing	BH5	DTZ Investors	Object. Policy does not confirm that the threshold approach as outlined in DNL policy H6 is being adopted. It should be confirmed with explicit text within the plan.	As Policy H5 of the draft London Plan will become part of the development plan on its adoption, by default the Mayor's threshold approach will apply. Nevertheless, additional clarity can be provided in BH5.	Amend BH5 to: "...in the period to 2041. <u>London Plan Policy H5 Threshold Approach to Applications will be applied.</u> The affordable housing..."

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.2 Housing	BH5	GLA	Housing proposed on industrial (where there is a resulting net loss of industrial floorspace) and publicly owned land will be expected to deliver at least 50% affordable housing in accordance with draft new London Plan Policies H5 and H6.	The Brent Local Plan does not need to repeat London Plan policy. The Brent Local Plan makes suitable reference to the policies in the London Plan.	No Change.
6.2 Housing	BH5	TfL Commercial Development	Policy requires 100% BtR development units are London Living Rent under the fast track approach. Reference to LLR should be specified as rent levels to avoid confusion with an LLR product. Support principle of LLR within BtR, however, concerned this will not provide a 'range of genuinely affordable rents' and would not provide a mixed and balanced community in accordance with DNLP policy GG4. DNLP policy H13 states 30% of DMR homes should be equivalent to LLR with the remaining at genuinely affordable rents. Rather than providing this mono tenure, a more balanced and flexible approach would be to revert to the DNLP policy standard. Given LLR levels are set by the GLA annually, with no way to predict this in advance, the suggested approach will provide Brent with greater autonomy over those rents secured. The current policy would also create a viability issue for most schemes, requiring a viability tested route. BtR developments have a different financial model, presenting additional challenges when compared with traditional sale homes. This will therefore slow and prevent delivery. This is particularly evident given the requirements of policy BH3 which state that all developments over 500 units should be BtR. It should therefore be amended to reflect DNLP policy H13.	It is acknowledged that the reference to London Living Rent ~~it~~ should be rental levels and not the product itself and as such needs to be amended. In relation to a mono-tenure, it is considered that the dwellings will be accessible to those on a range of incomes not necessarily those on the maximum incomes allowed for occupation. The inclusion of the 100% London Living Rent equivalents was as a direct result of the viability assessment work that the Council commissioned to support the policies in the draft Local Plan.	Policy BH5 amend: "Build to Rent developments, ~~a minimum of~~ 100 per cent at London Living Rent <u>equivalent rents or lower</u> "
6.2 Housing	BH5	Quintain	Strongly object as is unreasonable, not effective or justified having regard to viability evidence. The fast track route, particularly for BtR developments is unrealistic and will reduce delivery, being at odds with policy BH3. BtR developers will not be able to compete for sites if they are to provide 35% at London Living Rents for the fast track route. REFER TO APPENDIX 1 FOR DETAILED REP.	The inclusion of the 100% London Living Rent equivalents was as a direct result of the viability assessment work that the Council commissioned to support the policies in the draft Local Plan.	No Change.
6.2 housing	BH5	Wembley Towers Limited	The policy should be explicit in the 35% threshold approach not requiring a viability appraisal. The policy does not set out the approach for BtR. DNLP states that boroughs can publish guidance on the proportion of DMR to be provided at different rental levels through the fast track route. This should have regard toward the level of discount required and the viability of its delivery at the threshold level, reflecting NPPF which defines affordable housing for rent as 'at least 20% below local market rent (incl. service charges where applicable)'. This is suitable for BtR operators providing accommodation for key/essential workers in London.	The policy will be amended to make reference to London Plan policy H5, but does not need to repeat it. It sets out the approach for Build to Rent, identifying the threshold percentage as a minimum of 100% at London Living Rent. It is acknowledged however that this could be clarified to rents at those of equivalent to London Living Rent.	Policy BH5 amend: "Build to Rent developments, ~~a minimum of~~ 100 per cent at London Living Rent <u>equivalent rents or lower</u> "

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.2 housing	BH5	Stonebridge Real Estate Development	The policy should be explicit in the 35% threshold approach not requiring a viability appraisal. The policy does not set out the approach for BtR. DNLP states that boroughs can publish guidance on the proportion of DMR to be provided at different rental levels through the fast track route. This should have regard toward the level of discount required and the viability of its delivery at the threshold level, reflecting NPPF which defines affordable housing for rent as 'at least 20% below local market rent (incl. service charges where applicable)'. This is suitable for BtR operators providing accommodation for key/essential workers in London.	The policy will be amended to make reference to London Plan policy H5, but does not need to repeat it. It sets out the approach for Build to Rent, identifying the threshold percentage as a minimum of 100% at London Living Rent. It is acknowledged however that this could be clarified to rents at those of equivalent to London Living Rent.	Policy BH5 amend: "Build to Rent developments, ~~a minimum of 100~~ per cent at London Living Rent <u>equivalent rents or lower</u> "
6.2 housing	BH6	Stonebridge Real Estate Development	Draft London Plan Policy H10 confirms boroughs should not be prescriptive in setting market dwelling size requirements. The policy should be modified so a specific target for new homes as family sized dwellings should refer only to a target for low lost rent housing. This will ensure soundness. It is justified through compliance with draft London Plan Policy H12.	Taking account of the Panel's report Policy H10 has been amended to exclude reference to boroughs not setting area wide dwelling mix requirements. On the basis of needs and viability evidence the policy is considered justified.	No Change.
6.2 Housing	BH6	Quintain	Object as is unreasonable, not effective or justified with no evidence as to impact on viability. When taken with other policies (particularly affordable housing requirements and reprovision of commercial floorspace), the impact is significant and should be redrafted to provide flexibility in recognition of viability and local market conditions, as addressed in NPPF paragraph 122. It should therefore include the following clause: 'b) Its inclusion would fundamentally undermine the development's viability or the delivery of other Local Plan policies.'	The viability assessment takes into account the impact of the policies as a whole including the size mix. Creating more flexibility related to viability will in all likelihood reduce the delivery of family housing as anticipated by in the policy as developers will factor in provision of more non-family dwellings and increase land prices. The 25% is a significant reduction on meeting the identified needs of the borough's residents.	No Change.
6.2 Housing	BH6	Innovative Infill	Welcome objective to provide significant family housing, although may be challenging.	Agree that it will prove to be challenging due to the values attained through providing 1-2 bed homes for which there is also a substantial need.	No Change.
6.2 Housing	BH6	Stonebridge Real Estate Development	We note that the Council Seeks to promote new family housing with at least 25% of new homes being 3+. This conflicts with DNLP policy H12 which states such prescriptions are inappropriate for market and intermediate homes, however for low cost rents boroughs should provide guidance to ensure affordable housing needs are met. This quantum is therefore not aligned to an identified social need. It should also be recognised that families can accommodate 2D4P units and that these should be added to the definition of 'new family housing'.	On requiring 25% 3+ bedroom dwellings, the draft London Plan has been altered taking account of the recommendations of the Examination panel who considered it appropriate for boroughs to identify specific housing needs where these could be justified on the basis of local evidence. As such Brent's policy is considered appropriate.	No Change.
6.2 Housing	BH6	Wembley Towers Limited	We note that the Council Seeks to promote new family housing with at least 25% of new homes being 3+. This conflicts with DNLP policy H12 which states such prescriptions are inappropriate for market and intermediate homes, however for low cost rents boroughs should provide guidance to ensure affordable housing needs are met. This quantum is therefore not aligned to an identified social need. It should also be recognised that families can accommodate 2D4P units and that these should be added to the definition of 'new family housing'.	On requiring 25% 3+ bedroom dwellings, the draft London Plan has been altered taking account of the recommendations of the Examination panel who considered it appropriate for boroughs to identify specific housing needs where these could be justified on the basis of local evidence. As such Brent's policy is considered appropriate.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.2 Housing	BH6	OPDC	OPDC supports the family housing target and takes the same approach in its draft Local Plan.	Support welcomed.	No Change.
6.2 Housing	BH6	John Cox	Insufficient pressure on developers to supply family-sized homes. Amend Policy BH6 to say: “For every odd number of four dwellings included within a developments, at least one must be 3 bedrooms or more. For every even number of four dwellings included within a development, at least one must be 4 bedrooms or more.” That means passing the 8, 16, 24, ... dwellings levels each adds an additional guaranteed home of 4 bedrooms or more. Exceptions should not apply to larger developments, as this discourages wider mixed communities. On individual sites, consider relaxing tenure targets if it allows even more family housing in return. That is because of the obvious additional cost to developers of physically larger homes, but also the huge social stress within Brent of families desperately needing more space. Figure 33 is unsound. Remove London Affordable Rent as it is different to social rent in cost and thus the impact it has on low-income households.	Whilst this would in theory allow homes to meet a wider range of needs, in reality it would likely mean greater resistance/lower delivery of family dwellings overall as the viability element associated with 4 bedroom homes (particularly in flatted developments which will be the predominant form of development moving forward) will be reduced. The reality is that currently in many schemes the 3-4 bed element is substantively delivered in the affordable component of the development. Whilst there are some small differences between social rent and London affordable rent levels, the SHMAA was done on the basis of up to what people could afford, as such the category reflects affordable products which in price terms are below those of the equivalent of London Living Rents.	No Change.
6.2 Housing	BH6	Innovative Infill	Policy BH6 requires at least 25% of new homes to be family sized units, reflecting Brent's need. This will be difficult to achieve given high densities proposed in the majority of site allocations, growth areas and intensification corridors. Small infill sites offer an effective way of increasing the supply of family sized units. Failing to promote opportunities to deliver family sized units is a threat to the plan's soundness. Amending policy BH4 to a permissive approach to small sites will help to achieve the objective of BH6. An even wider geographic area than enlisted under H2A would improve delivery.	Noted, however market realities dictate that in the majority of cases developers will seek to maximise the provision of 1 and 2 bed properties as the value attained per sqm. compared to build cost is higher. This is also likely to be the case on small scale infill, where a smaller number of dwellings will mean the threshold for family homes is less likely to be achieved. As such a more permissive approach to locating homes in unsustainable locations is unlikely to achieve the provision of significant numbers of family sized dwellings and where it does is almost certain to increase car use as these households are much more likely to be dependent on using this as a means of movement.	No Change.
6.2 Housing	BH6- BH4	Innovative Infill	Paragraph 6.2.10 notes family size units (3 bed+) represent 53% of new homes needs. Policy BH6 will be notably difficult to achieve given market realities and the high densities proposed in respect of the majority of site allocations, growth areas and intensification corridors. Small infill sites, suitable for the construction of individual 3-4 bedroom homes, offer an effective means of increasing the supply of this type of unit. Amending BH4 to reflect a positive and permissive approach to small sites across a wider area of the residential suburbs will assist in achieving the objective of BH6.	Small sites do offer the potential for 3-4 bedroom dwellings. Nevertheless, market factors still dictate in these locations that 1 and 2 bed are generally the preferred homes developers seek to provide. Policy BH4 will be amended and identify that whilst sites outside priority locations identified will be acceptable, greater emphasis will be on character which may limit the density/ site coverage which might better promote opportunities for 3-4 bed homes compared to other sites.	As the draft London Plan policy H2A has been removed from the Mayor's Intend to Publish version, it is proposed that BH4 is updated to provide the policy for promoting small site development in the borough.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.2 Housing	BH7	Unite Students	Maintain argument made previously that criterion D) to demonstrate a specific Brent need, is contrary to the approach of the London Plan and the NPPF. It could prohibit purpose built student accommodation (PBSA) coming forward. It should therefore be removed. The removal of the 20% quota of students as a proportion of growth area population is supported. Policy criterion E) on over-concentration is onerous and should be removed. This is because there is no evidence or justification provided that a concentration of PBSA creates harm to residential communities. The approach to co-living accommodation is largely in line with emerging London Plan Policy H18. However, the requirement of criterion D) should be removed. It is contrary to the approach of the London Plan and the NPPF. It could prevent this type of development coming forward in the Borough. It is therefore recommended that this policy requirement is removed. Criterion E) should be removed as it is a restriction that could prevent co-living developments coming forward. As recognised in the London Plan, co-living developments can alleviate pressure on the use of family homes being used as HMOs.	Criterion d) makes specific reference to a London need for students, rather than a Brent need, recognising the role that outer London boroughs have been identified as playing in meeting the accommodation needs of students who study in central London, but for who there are limited opportunities available in those areas to provide purpose built student accommodation. For criterion e) the Council still regards this as necessary in order to ensure that there are balanced and mixed communities that have the ability to sustain a range of local infrastructure and not place an unacceptable burden on some forms, e.g. health. It is accepted that most purpose built modern student accommodation blocks are well managed and have limited impacts in terms of adverse impact related to anti-social behaviour. The Council recognises the value of co-living schemes and similar to student accommodation it appears many of the larger schemes are well managed. Nevertheless, in terms of creating balanced and mixed communities, over-concentration of properties which essentially have short-term/ more transient residents does not create sustainable places.	No Change.
6.2 Housing	BH7	Unite Students	Criterion E) should be removed as it is a restriction that could prevent co-living developments coming forward. As recognised in the London Plan, co-living developments can alleviate pressure on the use of family homes being used as HMOs.	For criterion e) the Council still regards this as necessary in order to ensure that there are balanced and mixed communities that have the ability to sustain a range of local infrastructure and not place an unacceptable burden on some forms, e.g. health. It is accepted that most purpose built modern student accommodation blocks are well managed and have limited impacts in terms of adverse impact related to anti-social behaviour. The Council recognises the value of co-living schemes and similar to student accommodation it appears many of the larger schemes are well managed. Nevertheless, in terms of creating balanced and mixed communities, over-concentration of properties which essentially have short-term/ more transient residents does not create sustainable places.	No Change.
6.2 Housing	BH7	Quintain	Object to part e where the definition of an overconcentration is defined as 4 of 11 adjacent properties. The policy already allows the Council to approve management standards to limit impact on neighbours, in addition to existing licensing powers. The application of arbitrary, borough wide ratio is not justified. This has particular implications for BtR schemes where apartments are often let as 'sharer apartments' which may be captured by this policy. This provides an important element of the housing market, relieving pressure on conversion of traditional family homes into HMO's, providing 'affordable' accommodation to those who are not eligible for subsidised affordable housing. It is also well managed, exhibiting none of the typical issues associated with HMO's. Further conversation may be required.	The licensing can assist with standards of the properties to reduce the potential for anti-social behaviour that might adversely impact on neighbours. Nevertheless, it does not address the issue of HMOs potentially increasing rents and as such making it less likely that single household can afford self-contained accommodation. The Council does want to encourage Build to Rent, nevertheless it does want to ensure that there are balanced and mixed communities and that new homes offer opportunities for Brent family households to be able to afford new dwellings. At its most extreme where the existing build to rent has no controls it could result in extensive areas essentially becoming co-living developments. In these types of developments where the potential for anti-social behaviour is likely to be lower, the Council could offer	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
				some flexibility, but it is unlikely to regard 100% of the development as acceptable as HMO accommodation.	
6.2 Housing	BH8	GLA	Support benchmark figure, and should be acknowledged as a benchmark figure, and not a target. This figure should be supplemented by local housing need informative to help provide a more specific annual target for the area, including information on the type and tenure of homes required. The current policy requires developers to work together which is not in accordance with DNLP policy H13, and is not evidence based. Boroughs are expected to work with providers to identify sites which may be suitable. The policy should be amended accordingly.	The Council's SHMA indicates the older persons' housing needs, related to type of accommodation. This is slightly below the amount of need identified by the London Plan, but also reflects an assumed lower level of annual delivery of homes overall to meet needs. The Council as a provider and also as an enabler works principally with registered providers to deliver sites (particularly affordable/ specialist housing) to specifically meet older people's needs. The delivery of these types of schemes is complicated and subject to a number of factors that change consistently over time, such the availability of housing and social care funding and models of delivery. This uncertainty limits the extent to which sites specifically allocated for older people's housing across the Plan period will not fall foul of the requirement to show that they are deliverable that would likely arise from objections from individual sites owners (as the Council does not own sites on which larger scale schemes can be delivered). As such it is considered that a more pragmatic approach related to the circumstances of individual larger sites is more appropriate. On these sites the scale of the affordable housing requirement, together with the flexibility allowed through larger developments means that it is more likely the an older persons scheme not likely to be provided by the market can be considered, or where it is feasible for the market to deliver it will not limit overall site viability.	Paragraph 6.2.16 amend : "..benchmark ~~target figure~~ ..." Policy BH8 amend: "..benchmark housing provision ~~target figure~~ ..."
6.2 housing	BH8	Wembley Towers Limited	It is noted that to meet the DNLP target for specialised older persons housing, provision should come forward in defined circumstances. Current policy states it should be provided as 10% of units within Growth areas (excluding South Kilburn), or on sites with a capacity of 500+ dwellings. Policy BSSA7 should be modified to indicate that the provision of specialist older peoples housing is encouraged, subject to feasibility, but not mandated.	It is considered that a policy that encourages provision will be insufficiently robust enough to ensure delivery of the older people's housing, whilst the requirement for its inclusion will provide greater likelihood of this occurring.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.2 Housing	BH8	John Cox	Developers should be required to consider placing this type of housing alongside community facilities like child nurseries and infant schools, given the strong international evidence of improved social well-being to both generations (and possibly those generations in between) from such arrangements.	The benefits of encouraging the types of interactions identified have been recognised by some operators of older people's housing schemes. The desirability of the consideration of the location of placing this type of housing alongside community facilities can be identified within the policy justification, along with reference good practice publications that show how such developments can be better integrated into the community.	Amend by adding paragraph 6.2.78a. <u>"The inclusion of older people's housing will play a part in creating mixed and balanced communities. The Housing Learning and Improvement Network (Housing LIN) provides a good source of information on high quality and innovative housing solutions for an aging population. Guidance has been produced by HAPPI (Housing our Aging Population Panel for Innovation) that gives examples of how to design homes so that they better meet users' needs. It also shows how they can be positively integrated into places to encourage the benefits that interaction creates between occupiers of the dwellings and the wider community."</u>
6.2 Housing Page 712	BH8	Quintain	Object 10% requirement. When taken with other policies (particularly affordable housing requirements and re-provision of commercial floorspace), the impact is significant. It should be recognised that, due to viability, South Kilburn cannot deliver specialist older persons housing, and should therefore consider impacts of this nature on other schemes. The Local Plan Viability Assessment has not included the impact of this policy as it does not consider sites over 500 units, the threshold for which this policy should be considered. A clause should therefore be inserted stating 'unless it can be demonstrated that such provision would not be viable'.	There is flexibility on the specialist affordable housing which can be either a market product or an affordable housing product. South Kilburn is exempt from the policy due to the cost of re-providing socially rented properties and supporting existing leaseholders which will result in around 50% of the dwellings being affordable that require the highest levels of subsidy. This type of policy requirement is not applicable to non-Council estate regeneration. The viability assessment will be updated to take account of the 500 dwellings or more development scenario.	No Change.
6.2 housing	BH8	Stonebridge Real Estate Development	It is noted that to meet the DNLP target for specialised older persons housing, provision should come forward in defined circumstances. Current policy states it should be provided as 10% of units within Growth areas (excluding South Kilburn), or on sites with a capacity of 500+ dwellings. Policy BSSA7 should be modified to indicate that the provision of specialist older peoples housing is encouraged, subject to feasibility, but not mandated.	It is considered that a policy that encourages provision will be insufficiently robust enough to ensure delivery of the older people's housing, whilst the requirement for its inclusion will provide greater likelihood of this occurring.	No Change.
6.2 Housing	BH9	John Cox	Cannot ignore the evidence of gypsy and traveller needs. The plan should meet these needs. Policy BH9 should set a target to meet identified need of up to 90 additional pitches. Provision of accommodation for Gypsies and Travellers in Growth Areas should be mandatory. Provision should be as early as possible. This will allow early and stable links with the wider incoming communities, and to provide early school-settlement, job and training opportunities.	It is agreed that needs cannot be ignored, however there needs to be clarity on what the defined need is which should be evident once the Secretary of State has clarified his position on the Mayor's intention to adopt plan. The practical delivery/ management of the sites also needs to be considered to gauge the potential ability to address the need identified if this is towards the levels identified in the Mayor's preferred methodology. The Plan provides the potential for inclusion within Growth Areas as well as a development management policy to deal with new schemes.	No Change currently, but consider once there is a final decision on the acceptability of the Mayor's methodology by the Secretary of State.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.2 Housing	BH9	London Gypsies & Travellers	The West London Gypsy and Traveller Accommodation Needs Assessment has found: 'A need for 83 pitches for households not meeting the planning definition. This consists of 23 concealed or doubled-up households or adults, 16 teenage children in need of their own pitch in the next 5 years, 2 moves from bricks and mortar, 4 from in-migration, and 41 from new household formation using a rate of 2.25% (derived from household demographics).' This evidences a strong need for Lynton Close and therefore the text should be amended as follows: 'The existing Lynton Close travellers' site will be retained unless evidence shows it is no longer needed.' The policy should set a target to meet the identified need of 90 pitches. the GTANA states that the need for households which do not meet the planning definition should be addressed by other means, such as via the SHMA or HEDNA and through other policies within the Plan, as is set out in the NPPF. Regardless of the definition used, there is a clear need which cannot be ignored. We welcome the approach that pitches should be provided as part of Growth Areas and that provision should be sought as early as possible with stakeholders, however, sites should be identified for provision. The criteria for assessing new proposals should be amended, removing from part b) the words 'without detriment to adjacent occupiers amenity'. This implies that Gypsy and Traveller employment affects other residents. Temporary accommodation needs for those who live in unsuitable locations or are travelling through the borough should be taken into account. The supported approach is set out in 'The potential for a negotiated stopping approach in London' report. We note that transit need is not identified in the GTANA, but does recommend those who commissioned the study to explore negotiated stopping as an alternative solution for short-term accommodation. The report recommends that meanwhile use locations for temporary stopping are identified in Local Plans, helping take a planned and managed approach to roadside camps, rather than resorting to evictions.	It is recognised that current evidence indicates that Lynton Close is required. Circumstances could however change if and when additional sites are provided and as such the inclusion of this part of the policy is considered appropriate. There is clearly a large difference in the results of need when considering the national and proposed London Plan definition. Once this has been clarified through the Secretary of State's consideration of the Mayor's Intention of Publish London Plan the Council can better plan to meet needs. The specific sites issue relates to the defined amount of need. The reference to 'without detriment to adjacent occupiers' amenity' is considered appropriate as there is a strong likelihood that as Growth Areas are predominantly residential led regeneration that these employment activities will be close to residential properties.	No Change.
6.2 Housing	BH9	GLA	Support recognition of new definition. Using this, Brent has a need for 90 additional pitches, equating to approximately 3ha of land. Requirement for new pitches should be included within suitable site allocations, taking a collaborative approach with neighbouring boroughs. Funding is available through the Homes for Londoners Affordable Homes Programme for new pitches. In addition, the requirement for consideration of sites over 1 hectare for to accommodate pitches is welcomed.	There is clearly a large difference in the results of need when considering the national and proposed London Plan definition. Once this has been clarified through the Secretary of State's consideration of the Mayor's Intention of Publish London Plan the Council can better plan to meet needs. The Council will consider the potential for funding from the Affordable Homes Programme at the very least for improvements/ additional capacity at the Lynton Road site.	No Change currently, but consider once there is a final decision on the acceptability of the Mayor's methodology by the Secretary of State.
6.2 Housing	BH9	Quintain	Object. When taken with other policies (particularly affordable housing requirements, reprovision of commercial floorspace, and older persons accommodation), the impact is significant. It should be recognised that, due to viability, South Kilburn cannot deliver specialist older persons housing, and should therefore consider impacts of this nature on other schemes. This requirement has not	Viability on this matter will be complicated and include a range of factors which will need to be factored in, such as size and how this is incorporated into a development, e.g. open site, or part of a building. The size of sites will need to be considered in association with the Gypsy and Traveller community, related to need to accommodate varying sizes of	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
			been included within the Local Plan Viability Assessment. The size of sites required should be defined. What is meant by 'innovative ways of accommodating needs' should be explained. We also object as there is uncertainty regarding the definition of Gypsies and Travellers and therefore the overall need.	recognised communities, successful management and the opportunities that exist. The Council cannot be specific about the innovative ways, but in a high density environment it is likely that the site would have to be incorporated into a vertically stacked mixed use environment, e.g. the pitches could be accommodated in the ground floor of a development with other uses above. It is agreed that there needs to be certainty on the amount of need identified which will occur once the methodology is resolved.	
6.2 Housing	BH9	John Cox	The West London Gypsy and Traveller Accommodation Needs Assessment found a need for 86 additional pitches for households not meeting the planning definition. There is evidence of need arising from the Lynton Close site, so the second half of Policy BH9's first sentence is not justified and should be removed. The Needs Assessment also says that the need for households not meeting the planning definition will also need to be addressed through other means. The evidence should not be ignored and you should plan to meet these needs by setting a target for up to additional 90 pitches. It should be mandatory for accommodation for Gypsies and Travellers to be provided in Growth Areas and provision should be made as early as possible.	It is recognised that current evidence indicates that Lynton Close is required. Circumstances could however change if and when additional sites are provided and as such the inclusion of this part of the policy is considered appropriate. There is clearly a large difference in the results of need when considering the national and proposed London Plan definition. Once this has been clarified through the Secretary of State's consideration of the Mayor's Intention of Publish London Plan the Council can better plan to meet needs. The specific sites issue relates to the defined amount of need. The reference to 'without detriment to adjacent occupiers' amenity' is considered appropriate as there is a strong likelihood that as Growth Areas are predominantly residential led regeneration that these employment activities will be close to residential properties.	No Change currently, but consider once there is a final decision on the acceptability of the Mayor's methodology by the Secretary of State.
6.2 Housing	BH10	John Cox	Take account of the Consolidated Changes to the Draft New London Plan on estate regeneration, supported by the Panel. There should be a policy of no loss of social rented housing. Collect data long-term on what housing loss happens in the borough, and of what tenure, to inform future policy. Also encourage other council departments to monitor and document changes in levels of poverty and deprivation in redeveloped areas. Paragraph 6.2.89 should be rewritten so that it is understandable. Also, "conformity with" should be changed to "justification for" since that is the role of supporting evidence. Paragraph 6.2.88 remove underscore.	The London Plan Policy H8 is clear on how boroughs should deal with the redevelopment of existing social rent properties, which the Council supports. The Council has made it clear that addressing the affordable housing requirements of the population is one of its highest priorities. Where there are choices and funding available to deliver social rent properties, this will be a priority.	No Change.
6.2 Housing	BH13	Mercedes-Benz Retail Group	Within sustainable located, high-density developments, 20sqm of private amenity space per flat is inappropriate and undeliverable. It introduces significant daylight/sunlight considerations, plus design and engineering ramifications. The space amount should be a minimum level that can be widely accommodated by developments for each dwelling. Where seeking to create additional floorspace, it may be more realistic and deliverable to include a target for communal residential amenity space.	The amenity space standards have been set based on Brent's experience of delivery to date, which has included many higher density developments. This requirement has also been factored into the viability assessments in past plans and the current plan. It should also be recognised that elements such as the London Plan Urban Greening Factor, plus policies to see ecological betterment, sustainable management of water, etc. all require space that can be incorporated into the amenity space provided. In higher density developments, the amount and quality of amenity space becomes more, rather than less important. Where the applicant has shown that they have made best endeavours to meet the target but fall short, the Council has in the past shown some flexibility taking account of the quality of the space provided, plus also the other	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
				benefits attained in the scheme. As such it is not considered that the policy is unreasonable.	
6.2 Housing	BH13	DTZ Investors	Object. Significant quantum required is in excess of being realistically achievable on high density developments within Growth Areas. Should increase flexibility of policy so as to not undermine potential development.	The amenity space standards have been set based on Brent's experience of delivery to date, which has included many higher density developments. This requirement has also been factored into the viability assessments in past plans and the current plan. It should also be recognised that elements such as the London Plan Urban Greening Factor, plus policies to see ecological betterment, sustainable management of water, etc. all require space that can be incorporated into the amenity space provided. Where the applicant has shown that they have made best endeavours to meet the target but fall short, the Council has in the past shown some flexibility taking account of the quality of the space provided, plus also the other benefits attained in the scheme. As such it is not considered that the policy is unreasonable as currently worded.	No Change.
6.2 Housing	BH13	Quintain	Object as not justified or positively prepared. Standards should differ with the size of residential unit. Examples should be referred to where other amenity provision, such as proximity to open space and internal amenity (such as that provided within BtR) can contribute toward provision. Text should therefore be amended as follows: 'In some locations, such as town centres, in high density developments or developments with a high proportion of smaller units the council understands that meeting the overall minimum might be challenging or unnecessary. In these instances, developments will need to demonstrate how the level of amenity space provided is considered to be acceptable taking into account other factors such as, mix of units, other areas of open space nearby and internal amenity spaces.'	The Council does not consider that it will be unnecessary for the developments to meet the standards, although as the policy justification identifies circumstances might make the achievement of the standard on site not possible. It is considered that additional wording to support justification of the provision of lower levels is appropriate.	Amend paragraph 6.2.100 to: "....meet residents' needs. <u>Where not meeting the standards, developments will need to demonstrate how the level of amenity space provided is considered to be acceptable taking into account factors such as, accessibility of dwellings to their own amenity space and its quality, the amount and quality of communal space, proximity to other areas of open space nearby and internal amenity spaces.</u> The calculation...."
6.2 Housing	BH13	St. George	Object as: Not sufficiently flexible, not consistent with national policy. Proposed modification: “.....(including ground floor flats) unless its inclusion would fundamentally undermine the development’s delivery of other Local Plan policies.” This significant quantum of amenity space is well in excess of what can realistically be achieved on high-density Growth Area developments. Its deliverability is questionable, therefore flexibility is required.	The amenity space standards have been set based on Brent's experience of delivery to date, which has included many higher density developments. This requirement has also been factored into the viability assessments in past plans and the current plan. It should also be recognised that elements such as the London Plan Urban Greening Factor, plus policies to see ecological betterment, sustainable management of water, etc. all require space that can be incorporated into the amenity space provided. Where the applicant has shown that they have made best endeavours to meet the target but fall short, the Council has in the past shown some flexibility taking account of the quality of the space provided, plus also the other benefits attained in the scheme. As such it is not considered that the policy is unreasonable as currently worded.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.2 housing	BH13	Stonebridge Real Estate Development	The policy is particularly onerous and prescriptive. Developments in built-up parts of London need to optimise valuable internal amenity space, whilst developments may also provide, or be best suited to the provision of, communal amenity space or the utilisation of public amenity space in the area. Paragraph 6.2.100 gives an indication of where flexibility will be applied if it is evident the policy cannot be achieved. The policy should be amended to reflect this paragraph: ‘Where sufficient private amenity space cannot be achieved individually for each dwelling to meet the full requirement of the thresholds above, the remainder should be supplied in the form of communal amenity space. In some locations, such as town centres, in high density developments the council understands that meeting the overall minimum might be challenging. Whilst amenity space will assist in achieving the urban greening factor targets, other requirements such as renewable energy sources may compete for areas that might otherwise accommodate amenity areas, such as roofspace. The provision of amenity space will be considered flexibly where it can be shown that all reasonable options for provision have been considered and where it can be demonstrated that high quality communal space can be delivered to meet residents’ needs’.	The amenity space standards have been set based on Brent's experience of delivery to date, which has included many higher density developments. This requirement has also been factored into the viability assessments in past plans and the current plan. It should also be recognised that elements such as the London Plan Urban Greening Factor, plus policies to see ecological betterment, sustainable management of water, etc. all require space that can be incorporated into the amenity space provided. Where the applicant has shown that they have made best endeavours to meet the target but fall short, the Council has in the past shown some flexibility taking account of the quality of the space provided, plus also the other benefits attained in the scheme. As such it is not considered that the policy is unreasonable as currently worded.	No Change.
6.2 housing	BH13	Wembley Towers Limited	The policy is particularly onerous and prescriptive. Developments in built-up parts of London need to optimise valuable internal amenity space, whilst developments may also provide, or be best suited to the provision of, communal amenity space or the utilisation of public amenity space in the area. Paragraph 6.2.100 gives an indication of where flexibility will be applied if it is evident the policy cannot be achieved. The policy should be amended to reflect this paragraph: ‘Where sufficient private amenity space cannot be achieved individually for each dwelling to meet the full requirement of the thresholds above, the remainder should be supplied in the form of communal amenity space. In some locations, such as town centres, in high density developments the council understands that meeting the overall minimum might be challenging. Whilst amenity space will assist in achieving the urban greening factor targets, other requirements such as renewable energy sources may compete for areas that might otherwise accommodate amenity areas, such as roofspace. The provision of amenity space will be considered flexibly where it can be shown that all reasonable options for provision have been considered and where it can be demonstrated that high quality communal space can be delivered to meet residents’ needs’.	The amenity space standards have been set based on Brent's experience of delivery to date, which has included many higher density developments. This requirement has also been factored into the viability assessments in past plans and the current plan. It should also be recognised that elements such as the London Plan Urban Greening Factor, plus policies to see ecological betterment, sustainable management of water, etc. all require space that can be incorporated into the amenity space provided. Where the applicant has shown that they have made best endeavours to meet the target but fall short, the Council has in the past shown some flexibility taking account of the quality of the space provided, plus also the other benefits attained in the scheme. As such it is not considered that the policy is unreasonable as currently worded.	No Change.
6.2 Housing	Blank Housing	Sudbury Town Residents Association	• Brent’s design policies do not have regard to the STNP. Brent Policies BH2 and BH4 are contradictory. Brent Policy BH7 could lead to HMOs, without providing for families and Policy BH13 is not justified.	▲The council does not agree that BH2 and BH4 are contradictory. The Growth Areas and Site Allocations have been identified as being sustainable areas for growth and provision of residential development. Meanwhile, town centre boundaries and intensification corridors (main movement / public transport corridors) have also been identified as more sustainable areas where the potential for meeting housing needs exists, as outlined in BH2. BH2 is therefore a positive policy which identifies areas suitable for potentially greater	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
				residential development in sustainable locations. In line with this, Policy BH4 also seeks to ensure that planning permission for small sites is given when sites are located in more sustainable locations, ensuring that high levels of car dependency is not generated and thereby improving air quality. •BH7 does allow for the provision of HMOs where a need has been identified. In conjunction with this the council is proposing to introduce a borough-wide Article 4 direction to remove C3 to HMO permitted development rights. • The council does not agree that BH13 is not justified. Policy D6 (Housing quality and standards) of the new draft London Plan allows for local planning authorities to set higher local standards of private outside space. Brent proposes to maintain its existing outdoor residential amenity space standards, which are of a higher space standard than the new draft London Plan, but allow for an element of flexibility if space standards cannot be met.	
6.2 Housing	Blank Housing	Department for Education	Housing policies and supporting text should include the following: requirement for offsite contributions from all sites which do not provide a school onsite, where such capacity does not yet exist; free land transfer to the Council and construction costs to be met by the development where onsite provision is required, subject to viability; clear reference to required funding mechanisms (S106/ CIL), with cross reference to appropriate evidence base for justification.	The Council obtains contributions for education from s106 agreements. In addition, the council can also allocate strategic CIL towards education infrastructure. . Where masterplanning of Growth Areas shows the need for additional school sites, these will need to be accommodated within those areas, or alternatives will need to be put forward by the site owners to accommodate the school needs. Currently the Council is not able to specifically identify the additional educational requirements related to individual Growth Areas in addition to planned school expansion already set out to support the Schools Place Planning Strategy to 2023. When this is clarified it will be set out in the revised Infrastructure Delivery Plan, whilst masterplanning will identify site specifics that arise as identified in association with the Council's schools planning team. Currently it is not considered that any one growth area (apart from Wembley Church End, and Burnt Oak Colindale which already have a school site identified) will require an additional school to be provided. In addition all land in Brent is brownfield and thus has an existing (usually high) use value. A number of schools are also now provided as conversions of existing buildings and include a capital cost. As such it is unlikely that the site can reasonably be required to be provided from one developer (or even a consortium across a wider area) for free without adversely impacting on viability, particularly for affordable housing. The Plan's site allocation policies and paragraph 7.1.13 outlines what education infrastructure is required, particularly in the earlier stages of the plan period. As such this is not considered an appropriate request.	No Change.
6.2 Housing	Blank Housing	Thersa	Housing: Recognise constraints with regards to planning for projected population growth, however, the more homes built, the more that will need building. What is being done to discourage reproduction? Encourage people to have no more than 2 children through education.	Housing: Brent has a role in meeting the substantial housing needs generated from its own population and also from wider London and to be consistent with national planning policy has to do whatever it can to meet these needs. 2nd generation	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
			This will have a significant impact upon the environment and peoples finances. Progress is slow so Brent should help build momentum. It would also address long term housing needs. Please reconsider they type of flats to get built as they are ugly and quick to become run down. Tall buildings reduce visibility of the sky, make us cramped and boxed-in, reducing quality of life, mental health and physical exercise. Also, ensure new/ existing homes have solar and are energy efficient.	families often have much lower fertility rates for a variety of reasons. Brent's design supplementary planning document has recently been updated which identifies the need to consider how well materials weather/ durability over the longer period. Tall buildings are a necessity to deliver at the densities and the number of dwellings required. They are being concentrated in certain areas of Brent to reduce their impact.	

6.3 SOCIAL INFRASTRUCTURE

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.3 Social Infrastructure	BSI1	GLA	Support policy. Brent has not however conducted a social infrastructure needs assessment which is required by the DNLP policy S1. Essential needs such as for schools and healthcare should be established and their delivery secured in site allocations in accordance with DNLP policies S2 & S3.	Noted. The Council has undertaken numerous assessments which consider social infrastructure, where necessary with the support of relevant bodies, e.g. CCG, the Council schools planning, etc. This information has been collated within the Infrastructure Delivery Plan. Those areas within the borough which are subject to significant change, including Neasden Stations, Northwick Park, Staples Corner and numerous significant site allocations all require masterplanning. Draft London Plan policy S1, criterion B notes that in areas of significant development and regeneration, social infrastructure needs should be addressed via area based planning, including through a masterplan approach. This approach will ensure that areas which will be subject to significant population increase will include the necessary social infrastructure. This method will be supported within the Infrastructure Delivery Plan which is seen as a live document, and will be updated as and when new infrastructure requirements are identified. Where known the site allocations specifically state whether a new school (primary & sec) and school expansion programme are required. This also goes for health facilities. Also the delivery chapter mentions these requirements based on the evidence set out in the IDP	No Change.
6.3 Social Infrastructure	BSI1	Department for Education	Policy requires new social infrastructure is located in 'flexible and adaptable buildings' and co-located with other uses. Whilst this may be appropriate in some instances, there will be educational facilities for which this won't be appropriate. This could be due to SEN requirements or safeguarding issues for instance. Therefore the words 'where possible and appropriate' should be added to points g) and h).	The needs of occupiers will be taken into account and this will clearly influence the extent to which buildings can meet criteria g) and h). For a school meeting SEN it makes sense for it to as much as possible be flexible to be re-purposed for general educational needs with as little structural change as possible. Criterion h) uses the wording 'ideally' therefore adding sufficient flexibility.	No Change.

Page 720	6.3 Social Infrastructure	BSI1	Sports England	Sport England welcomes the policy reference to community use agreement and to considering re-using or redeveloping sites for sports and leisure facilities where the existing use is deemed no longer required by the community. Sport England are concerned with the stance of Policy BSI1 and recommends that the current approach to social infrastructure is reconsidered, where individual policies are pursued. Sports facilities and playing fields should only be lost if there is identified surplus of provision (which is not the situation in Brent) in robust and up-to-date strategies or the facility is being replaced with at least equivalent quality, quantity and accessibility. As stated in the NPPF, para 97 and Sports England Planning policies. This is referred to within the document in para 6.6.15 under Green Infrastructure. Policy BSI1 does not take into consideration growth and future users nor considers the requirement for 'spare capacity' which is necessary to counter unforeseen circumstances, such as playing field being unavailable for a season. One overarching policy of social infrastructure does not take into consideration of each provision and does not guard against the loss of one form of social infrastructure to another. To ensure effective planning for sport and recreation, Sport England recommends a specific policy for indoor/built sport provision and another for outdoor/playing field provision that takes into consideration the findings and recommendations of the Playing Pitch Strategy and Indoor Sports and Leisure Needs Assessment and is in accordance Sport England's Planning Policy and the NPPF.	Noted. The policy as currently worded states that facilities will be retained unless they are demonstrably no longer required and that no other use is required on site, it would not result in a shortfall of that use, a better facility is provided. Given that facilities are already in shortfall within the borough, it would be difficult for a developer to argue the case against this policy. It is therefore seen as sufficient in its current form. Policy BSI1 does not address totally new social infrastructure for population growth. This is addressed within individual site allocations as necessary. The policy guards against the loss of one form of social infrastructure to another by requiring applicants to demonstrate that the existing facility is not required in its current use and that its loss would not result in a shortfall in provision. This helps distribute required social infrastructure effectively within the borough, especially considering limited space for such infrastructure, and its competition with other uses. Requirement for sports infrastructure is laid out within individual policies where necessary, including Place policies, Growth Area policies, and Site Allocations. This is seen as sufficient given the requirement to update the Plan every 5 years. Requirements for social infrastructure are laid out within the Infrastructure Delivery Plan, which serves as an evidence base document for the Local Plan.	No Change.
	6.3 Social Infrastructure	Blank Social Infrastructure	Thersa	Education: Closely CNWL in Willesden will be a mistake. Reducing access to local education will reduce residents employability. Reducing to one site will result in job loss and means there will be no post-16 education provision around Willesden. 7.1.14 states teaching facilities will be improved, but what about the huge investment into the Telford Building at CNWL Willesden 8 years ago? Or redevelopment at Willesden 2 years ago? More public money wasted. How can this be justified if only to last a short time? Do not wish to see this site redeveloped into flats. How long before the Wembley site closes? There was once 3 CNWL sites. There was huge investment around 10 years ago on the Kilburn site which only lasted a few years before closure.	Education: The decision to consolidate on one campus is that of the CNWL not the Council, nevertheless the Council is supportive if this allows the college to provide high quality education to meet the local population's needs. The majority of public institutions have been subject to significant reductions in budget since 2008 so needs to continually assess how it uses its assets and increase their efficiency, hence the need for consolidation despite previous significant investment in capital.	No Change.
	6.3 Social Infrastructure	Blank Social Infrastructure	Department for Education	DfE loans to forward fund schools as part of large residential developments may be of interest, for example if viability becomes an issue. Please see the Developer Loans for Schools prospectus for more information. Any offer of forward funding would seek to maximise developer contributions to education infrastructure provision while supporting delivery of schools where and when they are needed.	The provision of and access to this funding is welcome, but in the short to medium term is unlikely to be required by the Council.	No Change.
	6.3 Social Infrastructure	Blank Social Infrastructure	Department for Education	The Plan should be effective. In this context, it should be ensured that contributions for education by developers be sufficient to meet needs. This requirement has not been explicitly stated by policy within the Plan. the closest reference is by 4.44 which states that development will be expected to provide associated infrastructure. It may be appropriate to include a policy making clear that sites will be expected to contribute proportionately in line with PPG and DfE Contributions Guidance.	Noted. The current wording is seen as sufficient so as to require the appropriate funding for infrastructure from developments. All financial contributions captured from developments comes as Community Infrastructure Levy (CIL) payments. These are strictly for infrastructure to support development and is a standard requirement, being paid without negotiation. Funding will be allocated to projects as prioritised within the Infrastructure Delivery Plan.	No Change.

6.3 Social Infrastructure	Blank Social Infrastructure	Department for Education	Authorities have experienced difficulties in funding schools via S106 due to constraints on pooling, however, this has since been revised with scope for unlimited pooling. The advantage of securing S106 over CIL is that it is clear and transparent to all what the funds will be allocated toward, helping increase certainty that contributions will be used to fund provision of required school places. DfE supports this approach in line with CIL Reg 122.	Noted. The Council uses CIL to collect funding directly related to the impacts of development on infrastructure, this includes for educational purposes. As such it is not envisaged that S106 will be used in this manner, although it may be used to secure sites.	No Change.
6.3 Social Infrastructure	Blank Social Infrastructure	Department for Education	Support general approach to securing schools, however, we request clarification that developer contributions may be secured retrospectively when it is necessary to forward fund infrastructure in advance of anticipated growth. This would help ensure the Plan is positively prepared and deliverable.	Noted. The Council uses CIL to collect funding directly related to the impacts of development on infrastructure, this includes for educational purposes. As such it is not envisaged that S106 will be used in this manner.	No Change.

6.4 ECONOMY AND TOWN CENTRES

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.4 Economy and Town Centres	BE1	GLA	Support. There is a difference between suitable business space (policy E2) and affordable workspace (policy E3). Suitable business space can include lower cost business space and should be provided as part of schemes which exceed 2,500m² or a lower locally evidenced threshold in accordance with draft new London Plan Policy E2. Affordable Workspace, refers to workspace for a specific social, cultural or economic purpose which should only be sought within specific locations or and secured through S106 agreements. An approach should be adopted which sets out what type of workspaces and suitable business spaces are required and where based on up to date evidence. To avoid confusion with policy E3, a different term to 'affordable workspace' should be used as the two meanings currently conflict.	Noted. It is seen that the function of this policy meets the definition of Affordable Workspace as set out within draft London Plan policy E3. Supporting paragraph 6.4.12 notes that the workspace should be provided for start-up companies or in the form of 'move-on' space for SME's, prioritising B1(c) to meet needs. This meets a specific social, cultural, or economic development purpose as identified within London Plan policy. These needs were identified in the Brent Employment Land Demand Study. Due to our 'Provide Capacity' status, we have prioritised the delivery of floorspace within the B use classes, with the exception of B1(a). This is identified in policies BE1, BE2, & BE3. BE1 & BE3 specify B1(c) as priority. Policy BE2 identifies in which locations this should take place. The development of designated employment sites through co-location requires a masterplan approach. The GLA will be partner in this process. This will allow the Council to identify an appropriate distribution of uses within each allocation. Other sites will come forward for intensification as governed by the market, and in broad alignment with the West London Employment Land Review.	No Change.
6.4 Economy and Town Centres	BE1	Alun Evans	Current policy wording is irrespective of proposed use class which could have detrimental impacts upon viability of major developments, especially in growth areas and sites where business space has not been proposed as part of the development. It is queried whether the policy is intended to relate to major developments of over 3,000sqm B use class floorspace, rather than any major development over 3,000 in total. This is not consistent with NPPF as 10% of 'total' floorspace within major developments will prejudice the delivery of housing and other key land uses.	To date the affordability testing for the Local Plan confirmed that it applied 10% of affordable workspace to schemes where 3000 sqm. of industrial/office uses were being proposed. The policy was however written to apply to all developments irrespective of the principal use being industrial or not and this was not identified by the organisation undertaking the viability assessment. To support the current policy wording additional viability assessment work will be required. This will clarify if the current policy wording can be justified. Once clarified, the policy can either be retained, or amended for example to refer to industrial/office developments of over 3000 sqm. as identified in the viability assessment.	No Change currently subject to viability testing.
6.4 Economy and Town Centres	BE1	Quintain	Object as not effective. The policy requires the education quarter at Wembley to be protected and enhanced however from the officer's response it is clear that the education quarter has not been identified and will be decided by the final location of the new CNWL campus. The policy should therefore state that the Council will work with the CNWL and land owners at Wembley to deliver an educational quarter during the Plan period.	It had been assumed that clarity would have been provided on a definitive site for the College of North-West London at Wembley by now which would allow the identification of a 'quarter'. As such the policy will be widened in scope to support provision where it is necessary and protection of the subsequent site.	Policy BE1 amend: " <u>....Further and higher educational provision quarters</u> at Northwick Park and Wembley will be protected and enhanced.
6.4 Economy and Town Centres	BE1	Thersa	Plans to scale down the College of North West London should be opposed. The Willesden site has a long history which has systematically been downgraded through reduction in courses. Any further consolidation will reduce the offer to local employers and skills of the local population, affecting economic outputs and the ability of the local population to find work.	The CNWL provides courses which have to be attractive in content and in the environment in which they are taught to students. It is in a competitive market and like all further education establishments is required to reduce costs/maximise the efficiency of its estate, which the consolidation onto one site will do.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.4 Economy and Town Centres	BE1 - BE9	TfL Commercial Development	2. Wembley SIL has changed under policy BE2 and no longer states 'intensification as above, with the exception of site allocations', but is now solely for employment uses. This is not appropriate and should be reversed so that site allocations are exempt from solely employment use intensification.	2. The Council amended the policy on the basis of representations received from the GLA taking account of the emerging London Plan and the borough's status as a provide capacity borough. The GLA's interpretation of London Plan policy E7 for allocated sites appears to be that it does not apply retrospectively but only to those sites allocated as part of subsequent Local Plans, taking account of how a council can evidence it can release the site in accordance with E4 and E7.	No Change.
6.4 Economy and Town Centres	BE1- BE2	GLA	The Mayor maintains that the draft Local Plan is not in conformity with the London Plan. It does not respond positively to being a 'provide capacity' borough as set out in Table 6.2 of the draft new London Plan. It also intends to diverge from draft new London Plan Policy E7 through promoting co-location of non-industrial uses within Strategic Industrial Land (SIL) at Staples Corner and Northfields (East of Grand Union Canal). The West London Employment Land Review methodology is also a matter of non-conformity and contention as it challenges a fundamental element of the new London Plan evidence base.	Policy BE2 seeks to intensify both SIL and LSIS land for industrial uses. The Council's Local Plan Viability Assessment has identified that some SIL/LSIS sites will not be viable to intensify for solely industrial uses, and will need to be co-located with residential to increase viability and improve likelihood of intensification. These sites will require a masterplan approach, as is stated within the London Plan. The GLA will have input on this. Brent has limited brownfield land which is appropriate/ available for development. Many of those sites which are available are located within SIL/LSIS. The approach taken here is seen as appropriate given the significant industrial and housing targets set by the London Plan. The approach will provide both industrial intensification and residential development to come forward simultaneously, increasing the Plan's effectiveness in ensuring delivery. The Northfields development was granted planning permission prior to the adoption of the new London Plan which has taken a different, and significantly stronger stance on the loss of industrial land. In order to ensure the Plan aligns with current extant permissions, the Northfields SIL has been included as a separate category which will see that delivery of industrial/ employment land comes forward as outlined within application 18/0321 (as amended) as a minimum. The remainder of the SIL will be intensified consistent with the London Plan. Notwithstanding the GLA's position, the Council has consistently put forward the case the intensification on its own is unlikely to deliver the scale of floorspace/ equivalent land provision identified in the London Plan's evidence base. The Panel had evidently had significant concerns about the London Plan's ability to deliver to meet industrial land needs. The Mayor was recommended to consider a number of actions, including identifying more boroughs as 'provide capacity' and identifying future greenbelt review. Neither of these the Mayor has accepted. As such whilst the Council will work to intensify as much as possible, it is doing it within the reasonable parameters available to it to ensure delivery. For some SIL sites, particularly those where there a substantial transport infrastructure possibilities, the Council asks the GLA to take a more considered view to the potential of these sites in the round to meet a variety of London's needs	Policy BE3 amend: " <u>The Council will require the retention of and where possible the intensification of Local Employment Sites in industrial use.</u> The council will allow the release of Local Employment Sites to non-employment uses where:a) continued wholly employment use is unviable; orb) development increases the amount of <u>workspace as well as retaining the existing employment use or providing that additional workspace as affordable workspace in the B use class, with makerspace in use class B1(c) prioritised to meet demand. Where criterion a) is being used to justify the release, the maximum viable replacement of the existing employment floorspace will be sought.</u> Paragraph 6.4.21 amend: "....closely related sui generis uses. <u>They can be sites wholly in employment use, or part of the floorspace or yardspace of a mixed use building or site.</u> They make an important contribution to the local economy, by providing local employment opportunities and reducing the need to travel. This policy <u>in recognition of the borough's provide capacity status seeks to support the retention and intensification of Local Employment Sites in industrial use for continued industrial use, consistent with policy E7 of the</u>

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
				than those focussed purely on employment industrial. On Local Employment Sites, it is accepted that more could be done within the policy to promote the potential for intensification as a starting point, with mixed use promoted where this, or purely employment uses are not viable.	<u>London Plan. The policy...."Paragraph 6.4.22 amend".....with short term flexible leasesappropriate for SMEs. Where the Council accepts that a site is unviable for its retention for wholly employment purposes, it will seek the re-provision of maximum amount of employment space (with industrial were industrial was the existing use) that is viable in any development proposal."</u>
6.4 Economy and Town Centres	BE1- BE3	GLA	The Brent Employment Land Demand Study 2015 states a need for between 33,600m2 and 52,350m2 of B1a until 2029, whereas the London Office Policy Review 2017 projects a demand of 44,000m2 until 2041. In the absence of more up to date evidence, this relatively low projection means that Brent should set out an overarching policy to support the provision/ protection of B1a in town centres and other sustainable locations. It is not clear how sites have been identified for office development, and there is no policy to control how much and where it will be delivered. The DNLP identifies Brent, Kilburn, and Wembley Park town centres as having some potential for office development which needs to be reflected in the Local Plan. If Brent wishes to provide significantly more office space than established need, then a strategy should be in place to create the right economic conditions. Brent lost 180,000m2 of office space between 2013 and 2016, primarily due to PD rights. An Article 4 Direction has been submitted to limit losses to PD rights which the Mayor supports. Reprovision should be managed by policy. Table 2.1 of the DNLP sets out that the Wembley Opportunity Area should deliver 13,500 new jobs until 2041. The Local Plan should set out how it intends to meet this capacity through policy which releases office development from SIL and LSIS and focuses it within Wembley and other town centres.	Brent's Local Plan Viability Assessment indicates that pure office development is unviable, notwithstanding the needs identified. Market intelligence indicates that office is unlikely to be built in all but on a small scale to the south of the borough where rents are higher and recent trends point to exactly the opposite, the space is more valuable for other uses, particularly residential which has been taken up through permitted development to residential. Whilst some space has been completed by Quintain as part of its place-making for Wembley Park and to relocate an existing land owner to release a site for development, the remaining speculative element has remained largely unlet despite being marketed for at least 2 years. Brent has lost much office by prior approval. It has sought to restrict this loss by introducing Article 4 directions across the borough. Proposed loss of office will now be considered against Brent's local employment sites policy BE3. It is interesting to note that the Mayor expects Wembley to accommodate additional office, as well as all the other requirements of the London Plan in this area, such as a significant uplift in residential, hotels, night time economy uses and student accommodation, whilst seeking to ensure protection of SIL. The SHLAA undertaken by the GLA did not make any discounts for on residential capacity assumed on sites related to these additional needs. The GLA needs to consider the impacts of individual London Plan policy elements in the round, prioritising those of most importance and accepting that some of the less deliverable are more aspiration than minimum requirements. Whilst current plan policies would allow for new office in town centres, market appetite in the short to medium term appears weak. If it were to come forward on a significant basis, it would likely displace/ disrupt assumed residential capacity accounted for in this Local Plan.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.4 Economy and Town Centres	BE2	TFL Commercial Development	Broad support for approach to intensification of industrial land, including co-location with residential. However, the approach could be clearer in its aims to intensify industrial land within SIL and LSIS to enable the release of sustainable sites for residential. Although dealt with in the Employment chapter, further clarity would be beneficial within this chapter, including the following wording within paragraph 4.37 a): “The London Plan is clear that industrial land should be managed through the Local Plan process. As a ‘provide capacity’ borough, Brent will establish a clear and structured approach to deliver industrial intensification and land release, where appropriate”.	Recognition of Brent as a 'provide capacity' borough in the London Plan is considered appropriate in relation to the Growing a Good Economy section as this does differentiate it from many other London Boroughs.	Amend Growing the Economy objective a) to: “As a 'provide capacity' borough in the London Plan, make better use of Brent's ~~employment~~ industrial land through a structured approach to deliver industrial ~~its~~ intensification and land release, where appropriate and also where possible support additional housing/ community facilities through co-location”.
6.4 Economy and Town Centres	BE2	Ikea	There is no recognition that IKEA is an established retail (A1) and office location in the Plan. This is unlikely to change during the plan period. It has potential for intensification and a mix of uses alongside IKEA’s operations. The Council’s SIL site assessments recognises this. Furthermore, GLA have recognised its importance to be considered alongside the adjoining Tesco site as part of a comprehensive masterplan, achieving industrial land intensification elsewhere within the Wembley SIL, and allowing these non-industrial sites to be redeveloped for non-industrial uses. Accordingly, the site should benefit from a bespoke allocation that recognises these elements, whilst also being permissive of its potential mixed-use development intensification in the future. Uses could include, but not be limited to, housing and other commercial uses within the B Use Class. Section 4 of the Draft Plan outlines strategic objectives that the site can deliver. Draft Policy BE2 allows for co-location of residential uses in certain SILs, albeit this does not extend to include the Site at present. Brent Employment Site Analysis, November 2018, deemed the SIL as a whole as not appropriate for residential use currently due to its PTAL rating (much of which is lower/worse than the Site itself), and the presence of uses that could affect residential use through noise, odour and air quality. There is a clear recognition within the Council’s evidence, however, that the Site and adjoining Tesco areas have the potential for development intensification in the future. The ‘West London Employment Land Study’ (July 2019), also recognises the Wembley SIL as a potential area for co-location (Table 79). For the following reasons the Site is appropriate for, and could be allocated for a range of possible residential and commercial uses, alongside the existing IKEA:· It is already an established retail (A1) and office destination;· It is immediately adjacent to existing residential communities, to its south and west;· It is located in an accessible and sustainable location, with strong public transport links;· A mix of uses could promote a more effective use of the Site, meeting the need for homes and other commercial uses (NPPF Para. 117);· It is a brownfield location, thus encouraged for redevelopment;· Intensification of the Site would contribute towards the Plan’s strategic objectives, specifically creating strong and inclusive communities, making the best use of land, whilst potentially delivering the homes to meet Brent’s needs;· NPPF (Para. 122-123) requires efficient use of land including, where appropriate, building at higher densities;· NPPF requires optimising sites	Noted. Brent has been identified as a 'Provide Capacity' Borough in the new London Plan. This sets a significant industrial floorspace target. In order to meet this target, and to comply with London Plan policy E7, designated industrial sites such as this will need to be intensified for industrial uses. The site has long been designated as SIL due to its history of industrial uses, and proximity to the strategic road network. The site makes up part of Wembley SIL which is designated under policy BE2 for intensification of industrial uses only. It will not be possible for the Council to meet its London Plan industrial floorspace targets if areas of existing designated industrial land are reduced so as to allow for the development of other uses. SIL in particular is strategic in serving the wider London area, and requires significant areas in order to function effectively. They also include uses which would not be appropriate to co-locate alongside residential, and would represent bad neighbours. The West London Employment Land Review includes Wembley in table 79 as an area for potential co-location. The document states that this is in relation to the western most portion of SIL, given its proximity to the Wembley Area masterplan, and associated amenities and PTAL. The Eastern portion is not supported, due to low PTAL, proximity to 'bad neighbours', lack of amenity potential, proximity to the strategic road network, and impact of other uses on existing SIL function. This document also foresees a requirement of 13ha of industrial land required, whereas the new London Plan stipulates that Brent is to provide a further 43ha through intensification. This therefore does not support the release of SIL for other uses.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
Page 726			to accommodate and sustain an appropriate amount, and mix, of development; and· NPPF requires promotion of social interaction, which can be achieved by a mix of uses in a single location.London Plan Policy E7 allows for consolidation of parts of SIL to facilitate the release of some land for a mix of uses including residential. As a minimum, this approach must ensure “no overall net loss” in industrial floorspace capacity. The Site is not currently in industrial use, and there would clearly be no net loss in industrial floorspace capacity arising from an intensification of development.		
	6.4 Economy and Town Centres	BE2	GLA 1 WLELR: The approach to industrial land within the plan conflicts with the London plan as the supporting evidence (West London Employment Land Review - WLELR) uses different methodology compared with that used to guide London Plan policy (Industrial Land Demand Study 2017). This identified Brent as a ‘retain capacity’ borough instead of ‘provide capacity’. The study is flawed as it uses labour demand modelling to forecast land demand for warehousing. This is not appropriate in London, or nationally (PPG para 031 Reference ID: 2a-031-20190722). Warehousing demand is more closely correlated with growth in the economy and population rather than employment numbers. Therefore land demand for these uses has been significantly under estimated. This is also true for transport. The WLELR also lacks demand assessment for waste and utilities which also occupy industrial sites. It is also limited to a part of Park Royal. Heathrow property market. A broader assessment will have yielded better results. It identifies very low vacancy rates and some of the highest industrial rents in London, yet despite this, identifies little capacity although there is only one years identified supply.The Mayor strongly encourages, and considers it essential, for a new review to be undertaken which aligns with the methodology used by the London Plan and the PPG. The panel supports this methodology and suggested that it	The Council accepts its status as a 'provide capacity' borough. In terms of the methodology of the West London Employment Land Review, it will not pursue the approach of merely seeking to provide the lower hectares that this study showed would be required. The study provides a useful alternative in terms of sense-checking the London Plan work. The Council through its work on the Local Plan has sought to maximise the potential of its industrial areas through the approach to co-location on its LSIS sites, in recognition that for many areas in Brent, pure industrial development has been unviable and the Council's current viability studies indicate that on many sites this will remain the same. As such the Council has sought to incentivise sites through co-location. Current pre-application work/planning applications received recently indicate that this is working in areas where there is strong demand for residential too, such as Alperton where sites are delivering significant uplifts in residential, but also as a minimum achieving replacement existing floorspace or 0.65 plot ratio for industrial. Where intensification could work without other 'enabling'	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
			has likely underestimated demand and that the LP should take a firmer stance on the protection and provision of industrial land.	development, the Council has retained the 'intensification' designation for LSIS. It will essentially be for the industrial market to react to these opportunities. Evidence supporting the Brent Local Plan on viability, indicates delivery could be constrained by lack of financial viability and developer appetite for untested products, such as multi-storey developments. Time will tell if constrained demand and increased investor confidence following delivery elsewhere will increase supply in these areas. The Council will use the GLA's findings in relation to land for potential waste and utilities infrastructure needs.	
6.4 Economy and Town Centres	BE2	GLA	2Industrial Land Audit. Mayor supports in principle, however it does not follow the guidance set out in the Mayor's practice note on industrial intensification through plan-led and masterplan approaches. The audit should include information on: a site by site basis, existing plot ratios, occupancy and vacancy rates and land ownership among others. This will guide how intensification can take place and how sites with low vacancy rates may be improved. While a masterplan approach is suitable for individual sites, a provide capacity borough could only feasibly do this within a wider borough-wide strategic framework to ensure the borough wide targets are met. This should involve the identification of site floorspace capacity, and timescales for delivery. Monitoring will be key to ensure targets are met. Within policy BE2 both Staples Corner and Northfields SIL sites are identified as suitable for co-location which is not in conformity with LP policy E7. SIL may be released for non-industrial uses only where the remaining SIL has been intensified to offset losses, resulting in a minimum of no net loss. However, in Brent's case, addition capacity (most likely B8) would need to be delivered before SIL can be released for co-location. Given 43ha is required, SIL and LSIS should be intensified first, followed by non-designated industrial sites and other land including redundant retail parks. Northfields has resulted in the release of 9.16ha of industrial land designated SIL, and it is not clear how much of this will be reprovided on site. Permission for this was given after publication of the draft new London Plan in December 2017, and as such the London ILDS 2017 does not take into account this loss. Depending on the extent of reprovion Brent may need to secure further industrial capacity to make up for this loss and meet LP targets. Demand for warehousing and logistics space is driven by changes in consumer behaviour through new business formats brought forward by advances in technology which needs to be considered. The Mayor supports the recent Article 4 Direction to remove Permitted Development rights for conversion of light industrial to residential.	2. The Council will do more work on this study to help inform suggested ways in which existing SIL and LSIS sites can be intensified. Having said that it is not clear how undertaking such detailed specific analysis of individual sites will assist to any significant degree in increasing the prospects of delivery. To understand this, there will need to be extensive consultation with landowners/ occupiers to gain an understanding of appetite to intensify. This will take some time and will be very resource intensive to be done to a level that provides useful outputs. It can be taken forward in the context of the SIL and LSIS site policies that in the meantime will protect industrial land from other uses and allow intensification to occur where there is a willing landowner/ developer. Where there is potential for delivery the Council can work together with landowners/ occupiers to take forward masterplanning to provide a positive framework for investment. The Brent Industrial Land Audit identifies the theoretical capacity to provide the equivalent of 49 hectares on designated SIL and LSIS (excluding parts of Park Royal in OPDC). The London Plan provides a clear and positive policy framework to intensify; the principal issue is not whether there is a theoretical capacity to intensify, but whether the market is likely to deliver. Brent's local evidence and also evidence/ discussion at the London Plan Examination in Public round tables indicated concerns with GLA's assumptions for delivery of the 0.65 plot ratio for storage and distribution and also the appetite from historically conservative industrial space investors to deliver new products. The West London study indicates that investment in new stock as a proportion of existing over the last 30 years has been very small (about 14%). This historic trend of a low-level of renewal and now low vacancy rates indicate that realistically prospects of intensification of existing sites to meet assumed GLA targets are low, unless provision of space becomes so lucrative that it results in a sea change of delivery. Taking account of concerns with likelihood to meet needs, the panel made recommendations for the Mayor to consider identifying more 'provide capacity' boroughs and identifying the potential need to	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
Page 728				review the green belt in the next London Plan. Both of these options the Mayor rejected. As such whilst the Council accepts its status in the London Plan and will endeavour to encourage intensification, the GLA should also be realistic of the extent to which the policy framework whilst being supportive of intensification, can actually ensure the delivery of the quantum of additional space it has identified are necessary. In relation to co-location in SIL, the point is taken. The Council has concerns about how this will affect likely delivery of additional industrial floorspace, as many industrial premises are small and thus the model of intensification to release land on a site will in practice require many different site owners to work together, making delivery much more complicated. In relation to Staples Corner it asks the GLA to look at this area in the round and the opportunity it has in relation to a number of potential positive outcomes by incorporating co-location in parts, particularly on the periphery of the area, rather than a pure focus on intensification to allow release to other uses. Delivery of additional industrial floorspace will be much more likely where supported by cross-subsidisation through vertical co-location which will allow smaller sites to be delivered. On Northfields, approximately 6 hectares has been lost, when taking account of the re-provision of industrial space on site in a multi-storey development. This in theory will need adding to the GLA's 43 hectares target. The Council is liaising with the OPDC to identify the extent to which the portion of Park Royal that lies within the borough can contribute to achieving the GLA target. Due to the significant changes likely in the emerging OPDC Local Plan related to the retention of Car Giant as SIL, specific details of potential will be some months away as new masterplanning work is required to identify how London Plan housing targets can be achieved.	
	6.4 Economy and Town Centres	BE2	GLA	The Mayor expects existing uses within site allocations to provide the baseline data which underpins a borough-wide plan-led approach for intensification due to Brent's provide capacity borough status. Industrial Land Audit findings should directly feed into site allocations, stating which sites, which uses, and how much will be provided.	Noted. Intensification of industrial land will be managed primarily through policy BE2, using the draft London Plan approach of increasing the plot ratio to 0.65 or existing, whichever is greater. Opportunities to increase floorspace above this will take into account the likely potential for delivery, taking into account viability and wider aspirations related to place-making. Designated industrial sites which have been identified for co-location, as listed in policy BE2, will be subject to a masterplan approach. The masterplan will use the guidance outlined within Brent's Industrial Land Audit. This approach essentially allows the Council to manage the intensification of industrial land using the borough-wide assessment of the Industrial Land Audit, deferring any prescriptions to the masterplan stage.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.4 Economy and Town Centres	BE2	Amafhh Investment Limited	a) The policy incorrectly uses the term ‘employment floorspace’ instead of ‘industrial’ which the London Plan specifies in Part A of Policy E4. ‘Employment floorspace’ (within draft Policy BEGA2) creates confusion in the policy framework. References to ‘employment’ should be changed to ‘industrial’.	Noted. A) It is accepted that although employment in the policy is clear in identifying industrial uses, the difference in terminology with the London Plan might cause some confusion. On reflection it is considered that this should be changed to industrial.	Policy BE2 amend: "Within SIL and LSIS development will be supported where it intensifies ~~employment~~ <u>industrial</u> uses and accords with the principles as follows....."Policy BE2 amend: " <u>..These sites will be protected for solely industrial uses as defined in London Plan policy E4 Land for industry, logistics and services to support London’s economic function Criterion A</u> ". ~~employment uses within use class B1c, B2, B8 and closely related sui generis uses.~~ Development will be supported which increases the amount of ~~employment~~ <u>industrial</u> floorspace <u>in these use classes,</u> including start-up space, move on space. Any loss or reduction in floorspace will be resisted...."Amend Policy BE2 ".....A net increase in ~~employment~~ <u>industrial</u> floorspace; a mix of B1(b), B1(c), B2 and B8 ~~employment~~ floorspace will be...."Amend Policy BE2 " <u>..and affordability of employment industrial floorspace consistent with planning permission18/0321.....</u> "Paragraph 6.4.18 amend: " <u>...The West London Employment Land Review (WLELR) identified demand for an additional 0.6ha of industrial floorspace, primarily to meet projected demand for logistics. In addition to this, a number of sites within designated industrial sites are protected for waste purposes as identified in the West London Waste Plan and the policies map. The London Plan sets a higher waste target for Brent than previously which may mean additional sites for waste purposes will be required. Consistent with its 'provide capacity' status Brent the Council is committed to exceeding this</u>

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.4 Economy and Town Centres	BE2	Amafhh Investment Limited	b) The policy incorrectly refers to the requirement for “a net increase in employment floorspace”. This goes beyond draft London Plan the requirements and should be replaced with “no loss of industrial floorspace”.	b) Draft London Plan policy E7, part E notes that development plans should ensure that industrial land on SIL and LSIS are intensified to deliver an increase in industrial floorspace (or at least no net loss). The LB Brent has been identified within the new London Plan as a 'Provide Capacity' borough and has been set a significant target for industrial floorspace. Given this, it is seen as appropriate to intensify industrial land to incur a net increase in industrial floorspace.	figure deliver an increase in industrial floorspace to support growth in business and employment."Paragraph 6.4.18 amend: "...intensification of Park Royal which is being led by the OPDC. The extent to which intensification and co-location will lead to an increase in industrial floorspace at this time is not known. Initial preliminary masterplan options work on Staples Corner in association with the GLA has shown addressing landownership and viability issues to incentivise and deliver additional floorspace is a complicated process. Nevertheless, the Council will undertake best endeavours to provide additional capacity, with a backstop position of not dropping below the 0.65 plot ratio within each defined industrial location."Paragraph 6.4.19 amend: "The West London Employment Land Review (WNELR) identifies that whilst....."Paragraph 6.4.20 amend "In calculating what constitutes the minimum floorspace requirement required in any site's redevelopment, the existing employment industrial or warehousing floorspace or a plot ratio of 0.65 will be applied, whichever is the higher....."
					No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.4 Economy and Town Centres	BE2	Amafhh Investment Limited	c) An opportunity to identify other suitable uses in the Staples Corner SIL (as part of its mixed-use transformation) is missing. It should be expanded to include religious and community uses, hotel and conference centre.	c) The current allocated use includes 'co-location'. This is seen as flexible enough so as to allow for a multitude of uses. Policy BP2, criteria K & L state the need to provide sufficient social infrastructure in this area, and to retain the religious venues. The finer detailing of appropriate uses within the Staples Corner Growth Area site will be determined through a masterplan approach when it is clear how much land will become available for other uses and the extent to which supporting infrastructure is required to support these uses.	No Change.
6.4 Economy and Town Centres	BE2	OPDC	Reference to the West London Waste Plan (WLWP) required.	Agreed. This should be added to policy BE2 policy justification.	See change proposed in relation to response to Amafhh Investment Limited, added for clarity's sake.
6.4 Economy and Town Centres	BE2	St. George	Object. The Northfields development site area should be de-designated from SIL. 18/0321 was determined under DMP14 which, in addition to the Brent Employment Land Demand Study 2015, provided the framework for releasing SIL at this site. Despite this the site is still allocated as SIL. The requirement for a specified quantum of floorspace is outlined within site allocation BSWSA7 which reflects 18/0321. London Plan policy E5 and E7 confirms the scope for consolidation of SIL which should be done through a plan-led approach. The policies which affect the site should reflect the scale of development granted, and be flexible so as to allow for change. NPPG on supporting more effective use of land also notes the requirement to consider planning applications in land use allocations. In addition, annotate the proposal map SILs to reflect the BE2 schedule for clarity.	The Council sought to retain the designation to ensure that industrial floorspace was provided as part of the redevelopment, should the existing planning permission 18/0321 be subject to extensive change. However, on reflection the policy is clear, but can also re-affirm that the minimum amount, typology and affordability of employment floorspace provided as part of 18/0321 should be re-provided. On this basis, to reduce confusion about the status of the site, which essentially has planning permission for a residential led development which is a significant part of the Council's housing trajectory the SIL status of the site on the policies map will be removed and wording in BSWSA7 and BE2 suitably amended. Once the Plan has been adopted, an interactive policies map will be produced, similar to that which exists for the current Local Plan. This will be annotated, including links to relevant policies such as BE2.	BSWSA7 amend: "...Consistent with planning permission 18/0321 due to the site's historic SIL designation a minimum of 17,581 sq.m. of employment floorspace <u>of the typology and affordability associated with that planning permission</u> must be re-provided as part of the development. <u>Due to Brent's classification as a 'provide capacity' borough, should the opportunity arise, for example through co-location north of the river Brent or through intensification to the south, greater provision of industrial floorspace will be supported...</u> " BE2 amend: "Northfields (<u>east and west</u> of Grand Union Canal)" BE2 amend: " ~~Northfields (east of Grand Union Canal) SIL Co-location within site boundary of extant planning permission subject to as a minimum providing the amount, typology, and affordability of employment floorspace consistent with planning permission 18/0321. Intensification on the remainder of the SIL~~ " Policies Map amend: Remove Northfields 18/0321 site north of

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
					the Brent River from SIL designation.
6.4 Economy and Town Centres	BE2	St. George	Object. De-designate SIL at the Trading Post Site, Heather Park Drive. The Northfields site has effectively removed the SIL allocation from the 18/0321 site area. This provides the opportunity to regenerate the wider area through co-location within the remaining SIL. This site in particular can retain industrial capacity whilst also providing additional residential above without impact on the SIL function. London Plan Policy E5 and E7 confirms that there may be scope for selected parts of SILs to be consolidated. This should be done through a carefully co-ordinated plan-led approach.	Noted. It is accepted that the Northfields scheme essentially will remove all of that site along Beresford Avenue from industrial use. Notwithstanding this, the GLA has identified that it is important to retain/ intensify the remaining SIL to meet the borough's 'provide capacity' status. Although located adjacent to residential the site is in a prime location as of proximity to the north circular road and as such its retention is considered justifiable.	No Change.
6.4 Economy and Town Centres	BE2	Savilles on behalf of client	Support approach, however, when co-location is referenced, residential should be specifically mentioned. Masterplan approach is not justified as sites such as Capitol Way Valley allocates intensification and co-location. Therefore, change wording as follows: Policy wording: 'On these sites intensification through co-location with residential or other identified uses will be supported, subject to a plan-led allocation approach where applications are consistent with this plan or through a comprehensive masterplan approach produced with or agreed by the Council demonstrating the following will be achieved...' para 6.4.1 amendments: 'Policy BE2 is a starting point which identifies where co-location could be appropriate, but this would be subject to demonstrating the criteria in London Plan policy E7 could be achieved through a plan-led approach consistent with the allocations within this plan or through a masterplan-led approach. In both approaches it will need to be demonstrated that co-location would achieve a plot ratio of 0.65. The Council will work with its partners to develop masterplans for Church End, Neasden and Staples Corner. Where applications are made to be consistent with the allocations in this plan, the developer will need to demonstrate that an approach has been taken that considers the relationship with surrounding sites and the wider area, and does not prejudice the overall vision being delivered. masterplans are developer-led, the developer will need to work closely with the Council and GLA from the outset. Masterplans will need to be produced in accordance with the GLA Practice Note: Industrial intensification and co-location through plan-led and masterplan approaches.'	Noted. It is acknowledged that the most common form of relocation will involve the inclusion of residential, however, to allow for other appropriate uses it has not been prescribed. This will help encourage the inclusion of other uses. The wording within policy BNSA1 aligns with policy BE2, with both requiring that employment land is intensified with successful co-location. To gain support for the wider range of uses of these sites, the Council will require the GLA's support, who will require masterplanning to be undertaken to be convinced that there will be no overall loss of industrial and that more than this the Council is seeking to intensify the industrial capacity of these areas.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.4 Economy and Town Centres	BE2	Blue Coast Capital	Support approach towards delivery of affordable housing in LSIS sites, however, policy should be clearer about the quantum's of employment floorspace which will be sought.	The London Plan is clear in setting out the minimum amount of industrial floorspace required, which is the Council's approach as a minimum. Further work is required to work with OPDC and the GLA to understand how much of the 43 hectares equivalent additional requirement identified by the GLA should be delivered in Brent. The Council considers that the minimum requirements of the GLA should deliver the necessary uplift required on the basis of its evidence, but needs this to be approved by the GLA.	No Change.
6.4 Economy and Town Centres	BE2	Braeside Properties Limited	Inclusion of 43-47 Alperton Lane within LSIS and subsequent development restrictions is not justified. The site could help promote economic and residential development within the borough. This would reduce the flexibility of the site to respond to market demands, and would not align with proposed mixed-use plans to the east.	In relation to this site the new London Plan identified Brent as a borough which is to provide industrial floorspace capacity. Following this, Brent undertook an Industrial Land Audit which provides recommendations to increase industrial floorspace through intensification, co-location and other mechanisms, and allowed the potential to extend current SIL / LSIS boundaries to support the aim of providing industrial floorspace capacity. The council maintains that this industrial site (comprising factories, warehouses and premises) is a natural extension to the LSIS in terms of function and therefore should be included within the LSIS in order to protect their industrial function and support the identification of Brent as a provide capacity borough. Brent's Industrial Land Audit identified that this LSIS was not appropriate for co-location. Because this parcel of land has been included in the Alperton South LSIS (due to being a natural extension to it) it is not considered to be appropriate for co-location. Additionally, the West London Employment Land Review has identified that LSIS sites such as this are likely to be viable to come forward solely with industrial uses and would not require any residential development to help subsidise this.	No Change.
6.4 Economy and Town Centres	BE2	Thersa	I am a disabled person with work experience in supporting disabled people. No mention of high unemployment levels experienced by the disabled. The plan should address this by improving local business access to employees and customers. It should be a requirement for businesses to have transparent plans to improve such access. This is in association with the purple pound, and the disabled employment and pay gaps. This should be considered proportionately with the number of disabled people within the borough and their struggle to find appropriate work. Significant consultation with key stakeholders will be required. Does Brent have a disability forum? It appears Brent closed down (or allowed to close down) the Brent Association of Disabled People.	Noted. The Local Plan only has the capacity to prescribe how future development should come forward. Therefore this is outside the remit of the document. However, a number of policies make clear the requirements for inclusive design. These requirements are further strengthened by the guidance laid out within the Brent shop front SPD. Policy BT1 requires developers to meet the Healthy Streets Principles and provide access for all. Policy DMP1 also requires developments to be satisfactory in terms of means of access for all. This is further elaborated within draft new London Plan policy D3 with regards to inclusive access. Brent does have a disability forum which is chaired by a Councillor.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.4 Economy and Town Centres	BE2	Ikea	Remove SIL from Ikea land as current use is retail and offices, not industrial. The land will not be developed for industrial uses, is a peripheral location, and already generates significant employment. The council has not justified the designation of SIL. The GLA have accepted the sites non-industrial use.	Noted. The site has not been newly designated as SIL, and existed as SIL prior to the adoption of this new Plan. SIL is given strategic protection in the draft new London Plan, and is to be sustained and enhanced under policy E5. Brent is identified as a 'Provide Capacity' borough in the new London Plan and has been set a significant target on the provision of new industrial floorspace. To meet this target the Council will require all appropriate land to be intensified with industrial uses. This includes all existing SIL. The site is not peripheral, being within close proximity to the North Circular Road.	No Change.
6.4 Economy and Town Centres	BE3	Alun Evans	The supporting text of policy BE3, paragraph 6.4.23 sets very prescriptive criteria for Local Employment Sites for part b) of BE3. It is considered that this paragraph should be amended to exclude development within growth areas as it could impact upon viability of proposals which are residential or commercial focused. This does not reflect the NPPF in terms of meeting delivery objectives including housing.	Noted. The amended London Plan places significant requirements on Brent compared to the FALP version, not least the need to provide additional capacity for industrial, but also the identification of Wembley as a priority location for office. As such the Council is seeking to balance up competing needs such as these requirements with the desire to increase housing delivery.	No Change.
6.4 Economy and Town Centres	BE3	Dominvs Group	Object: The policy is not justified being inconsistent with draft London Plan Policy E7 D 2). This states that allocated mixed-use or residential development proposals on Non-Designated Industrial Sites should be supported. The policy has not been positively prepared and is ineffective as supporting paragraph 6.4.23 requirements are disproportionately onerous relative to the policy content. Such requirements include an increase in the amount of employment floorspace on the site in the B use class. The policy should be amended to: add an 'or' to the end of part b) and add a part c) which reads 'where it has been allocated for residential or mixed-use.' (or similar). Parts a) and b) should be removed from paragraph 6.4.23 to make requirements consistent with and proportionate to policy wording.	Taking account of GLA policy responses to the Local Plan on sites with existing site specific allocations for non-industrial development on industrial sites it would appear that London Plan policy E7 in relation to Non-designated Industrial Sites is not retrospective in its application to existing Local Plan allocations, but expects such allocated sites to be justified post the London Plan's adoption as part of the respective borough local plan adoption process.	No Change.
6.4 Economy and Town Centres	BE4- BE5- BHC4	Sudbury Town Residents Association	Paragraph 5.7.9 identifies Sudbury as a Town Centre. Sudbury is too small to be identified as a 'Town Centre', meeting local needs only, and should therefore not include any Intensification Corridors. Paragraph 5.7.11 states the centre has a high vacancy rate, but one of the highest proportions of night-time economy uses which is contradictory. The Sudbury Town Neighbourhood Plan does not support betting shops, 24-hour fast food outlets or liquor shops as they lead to unpleasant environments. This constitutes the existing 'night-time economy'. To base new development upon this detrimental feature of the centre is unacceptable.	Noted. Sudbury is listed as a Local Centre under the town centre hierarchy in paragraph 6.4.27 as is the case in the new London Plan. Paragraph 5.7.11 notes that Sudbury Town Centre essentially meets Local Needs. Intensification Corridors have been identified due to their proximity to amenities, in areas which have high public transport accessibility and are located on wide roads, having capacity to accommodate taller buildings. Although the vacancy rate is relatively high, the proportion of the offer which does exist, tilts largely toward the night-time economy. Policy BE5 seeks to restrict the proliferation of betting shops, adult gaming centres, pawnbrokers, take-aways, and shisha cafes. Night-time economy refers to all economic activity taking place between 6pm and 6am. The night time economy will be supported across the borough in accordance with draft	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
				London Plan policy HC6. Sudbury will not however be prioritised for this, with delivery being pushed toward the town centres of Wembley, Kilburn, Cricklewood and Wembley Park. It is not possible to restrict the sale of alcohol in off licences through the planning system.	
6.4 Economy and Town Centres	BE5	Thersa	Policy could go further considering residents poor physical, mental and financial health and the recent proliferation of these uses. Maybe we should ask why other businesses don't want to open within the borough. Areas of the borough are run down. This does not attract a mix of shops and has led to significant closures within areas such as Church End and Harlesden. There has been a managed decline which will be impossible to fully repair.	Noted. The policy seeks to restrict further proliferation of uses detrimental to residents health, whilst ensuring there is sufficient space for key uses to enable Town Centres to function as required. High street decline is a result of numerous inter-related issues, and is noticeable across the nation. This is primarily a result of the change in shopping patterns and the growth of online shopping. Central government has identified a new High Street Fund, which the Council will look to secure funding from to support town centres. This will assist in the maintenance/ enhancements of poorer environments within the boroughs Town Centres, helping to improve vitality/ viability, and ultimately resident health.	No Change.
6.4 Economy and Town Centres	BE5	Kentucky Fried Chicken (Great Britain) Limited	Not positively prepared. Criteria A, B, C, and E headed 'takeaways' are not based on any objectively assessed development requirement, and there is no evidence on optimum mix, separations, school zones, or frontages generally. A and B will create areas for which no new A5 would be permitted, and because PD rights only allow changes of use from (and not to) A5, over time these areas would have no A5 uses. No assessment has been made of the number of households affected or projected nutritional intake in those areas, so it is impossible to strike a balance with the potential benefits of job creation, facilities, viability, accessibility or footfall. Not justified. Only deals with A5 uses (hot food takeaways), and does not address hot or cold drinks takeaways and cold food takeaways within classes A1 or A3. Whilst food of high energy density/ poor nutritional value is available at hot food takeaways, there is evidence that other food/drinks facilities are similar or worse in that respect (Robinson, 2018), and therefore focusing on A5 cannot be justified. The June 2014 survey of takeaway use among students explicitly set out to support the policy, relied on self reporting and assumed students that did not eat school dinners or sandwiches used takeaways. Criterion b now also includes primary schools, increasing the affected area significantly. Appeal decisions (e.g. APP/P4415/A/11/2159082 and APP/W4515/W/16/3154960) are clear that pupils are carers responsibility. Not effective. Criterion b requires evidence of a causal link between proximity of A5 to schools and incidence of obesity, however, this evidence is limited and conflicting. As this has not been established, it will be impossible to monitor policy effectiveness and is unclear whether areas impacted would be reduced, expanded or withdrawn in response to obesity level changes. Not consistent with NPPF. NPPF seeks to enable healthier lifestyles by creating, not restricting choice, and increasing access to recreation and	Noted. Draft new London Plan policy E9 states that development proposals containing A5 uses will not be permitted where they are within 400m of a primary or secondary school. The policy also states that boroughs should consider the appropriateness of locally defined thresholds to reduce over concentrations of A5 uses. This has been supported by the panel report. The panel report acknowledges the difficulties in identifying direct causation with regards to childhood obesity, however identifies that national guidance and common sense justify this approach. The panel found that the existing 7000 A5 premises in London should be sufficient in providing for need and supporting the industry. To retain the retail function of the town centre, an upper limit of 6% of a town centre frontage has been set to restrict the over concentration of A5 uses. The approach taken does not include other drinks/ food takeaways as this is not as strongly supported by evidence, and neither is it supported within the draft new London Plan. The Council is essentially retaining its current policy which has been previously accepted at examination based on local evidence showing the link between children's eating behaviours and the proximity of takeaways. As such the policy is considered to still be justified.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
Page 736			health services. Such services should be within walking distance to public transport and other facilities. This policy would reduce choice and restrict access by preventing a main town use being placed within a town centre. There has been no assessment of how the policy would impact specific town centres. PPG states to limit proliferation, policies should have regard to proximity, incidence of obesity/poor health, and over concentrations. Brent has no such evidence.		
	6.4 Economy and Town Centres	Para 6-4-51	Thersa	Local Plan should identify specific actions which will be taken to improve high streets. This should specifically reference disabled, step-free access to shops.	Noted. The Local Plan only has the capacity to prescribe how future development should come forward. Therefore this is outside the remit of the document. The priority town centres will have action plans taken forward by the town centre managers that cover a wide range of aspects that the Council as a whole can address. A number of policies make clear the requirements for inclusive design. These requirements are further strengthened by the guidance laid out within the Brent shop front SPD. Policy BT1 requires developers to meet the Healthy Streets Principles and provide access for all. Policy DMP1 also requires developments to be satisfactory in terms of means of access for all. This is further elaborated within draft new London Plan policy D3 with regards to inclusive access. Brent does have a disability forum which is chaired by a Councillor.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.4 Economy and Town Centres	BE9	Dominvs Group	Wembley Strategic Cultural Area's omission as a suitable location for hotels and other visitor accommodation (relative to the previously published version of the policy) is unjustified and inconsistent with adopted and emerging London Plan policy. It is also inconsistent with the 'Central Place' vision and Policy BCGA1, which both specify hotels as contributing to Wembley Growth Area's mix of uses. The reference to hotels and other visitor accommodation being appropriate in sites allocated in the draft Local Plan is supported. Wembley Strategic Cultural Area should be reinstated as an appropriate location for hotels and other visitor accommodation.	The Strategic Cultural Area policy was associated with the Wembley Area Action Plan and had limited effect in steering/ delivering an enhanced cultural offer and has essentially been usurped by permissions granted, predominantly for residential development, apart from along the main town centre spine of Olympic Way. The current allocation for Euro-car parts identifies the potential for a hotel consistent with its previous allocation in the Action Plan which can support the functioning of the stadium, SSE and London's central tourist attractions consistent with London Plan policy. The Council has continued to support this use in pre-application discussions. Elsewhere BE9 seeks to guide the development of Hotels towards areas with demand, and that are sustainably located in close proximity to key transport nodes. Where exceptions are considered as appropriate, hotel use has been identified within the allocated use of site allocations. The policy identifies Wembley Town Centre as a location appropriate for hotel use, and therefore aligns with the vision and policies BCGA1 and BP1 as it overlaps with the growth area. Site allocations within the growth area have also been identified as appropriate for hotel provision, therefore facilitating the delivery of BCGA1, BP1 and the Central Place Vision. It was seen as necessary to make this distinction to bring the policy in line with the Wembley Area masterplan, and extant outline permissions.	No Change.
6.4 Economy and Town Centres	BE9	Amafhh Investment Limited	Policy BE9 supports hotel development in the town centres of Wembley and Kilburn. Hotels and conference centres help support a vibrant business environment. The policy should be amended to support visitor accommodation and attractions in designated growth areas, such as at Staples Corner.	Noted. Hotels are identified as main town centre use in national policy to which the sequential approach applies. Staples Corner is not a main town centre nor in close proximity to one. The policy seeks to guide the development of Hotels towards areas with demand, and that are sustainably located in close proximity to key transport nodes. This is supported by London Plan policy E10. Wembley and Kilburn Town Centres are Major centres, with good links directly into central London. Further provision in Wembley will help support its status as a destination for sports and entertainment. Provision in Kilburn is currently lacking, and is promoted to support the function of London as an international tourist destination. Staples Corner does not have strong public transport links into central London, and neither is it a tourist destination in itself. Visitor Accommodation will be directed toward town centres, not Growth Areas, as is required by draft London Plan policy. In addition its identification as SIL means that a hotel is not an acceptable use as it does not fall within the industrial use classification.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.4 Economy and Town Centres	Blank Economy and Town Centres	Sudbury Town Residents Association	Economy and Town Centre Policy should not apply because Sudbury Town is a Local Centre not a Town Centre.	Sudbury Town is designated as a "local centre" in the town centre hierarchy (par 6.4.27), but all local centres, district centres and major centres are designated as "town centres". As such Sudbury Town is considered to be a town centre. As such the town centre and employment policies will apply.	No Change.

6.5 HERITAGE AND CULTURE

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.5 Heritage and Culture	BHC1	Mary Duffy	A low-rise neighbourhood is a heritage asset in itself, and the quiet residential nature of Brent is being replaced with high rise monstrosities.	The Council has to plan to meet the needs associated with the predicted growth in population. It has sought to concentrate tall building development in locations with greater accessibility to public transport and outside conservation areas. As such the majority of the character of the borough will remain essentially low rise suburban in character over the lifetime of the Plan.	No Change.
6.5 Heritage and Culture	Para 6-5-18	Historic England	Remove: "Its archaeological discoveries are scarce; sites have been built over and there are limited places where archaeologists could investigate." This significantly downplays the archaeological potential without proper assessment. Substantial areas with limited development to date mean potential for previously undiscovered archaeological remains.	This is considered factual, however it potentially can be seen to downplay archaeological potential without proper assessment. As such it is proposed to slightly amend the wording.	Paragraph 5.5.18 amend to: "...Its archaeological discoveries <u>to date</u> are scarce; ..."
6.5 Heritage and Culture	Para 6-5-19	Philip Grant (Wembley History Society)	Correct reference should be to BHC1, not BD1.	BHC1 should be the correct policy to reference.	Paragraph 6.5.19 amend: "...Policy ~~BD1~~ <u>BHC1</u> therefore.."
6.5 Heritage and Culture	Para 6-5-26	Historic England	Recommend the following is added to the end of this paragraph: "...evaluation, in order to assess the archaeological significance of the site and the scale of the archaeological impact from the proposed works. Applicants should consult with Historic England's Greater London Archaeological Advisory Service should take place in order to determine the scope of the archaeological requirements."	This proposed addition is considered to provide further clarity and a useful source of additional advice when considering archaeological significance.	End of paragraph 6.5.26 amend: "...evaluation, <u>in order to assess the archaeological significance of the site and the scale of the archaeological impact from the proposed works. Applicants should consult with Historic England's Greater London Archaeological Advisory Service should take place in order to determine the scope of the archaeological requirements.</u> "
6.5 Heritage and Culture	BHC2	Quintain	Protecting the views of the National Stadium is supported but Wembley's status as a growth area must also be recognised. The following should be added to the policy: "Development must not be to the significant detriment of the following views as shown on the Policies Map of the National Stadium Wembley."	It is recognised that the area around the stadium is a growth area identified for a substantial amount of development. Nevertheless, the stadium is an iconic feature of national significance. The heights allowed in existing planning consents show that the opportunity for tall and high density buildings exist, without in most cases necessarily having a detrimental impact on protected views. The need for development to not cause significant harm is considered to weaken the policy below that set out in London Plan policy HC4 London View Management Framework, which boroughs are encouraged to use when identifying Local Views as set out in London Plan Policy HC3 criterion g).	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.5 Heritage and Culture	BHC2	OPDC	Policy BHC2 identifies view 17 (Abbey Road/Grand Union Canal Park Royal) which is located within the area of borough for which OPDC is the local planning authority. Insert text: "17 views have been identified. View 17 is located within the part of the borough where OPDC is the local planning authority. BHC2 will only be implemented in relation to this view for development proposals where the London Borough of Brent is Local Planning Authority."	It is agreed that some of the views identified originate outside the area where the Council is local planning authority. Although the Council cannot determine applications outside its area, it has made other relevant planning authorities aware of the views through the Statement of Common Ground/ Duty to Co-operate so that they recognise them as a material consideration in the determination of planning applications.	Amend by inserting at the beginning of paragraph 6.5.29. <u>"17 views have been identified. Two views originate outside the area where the Council is Local Planning Authority. The Council has made OPDC and LB Ealing aware of each view's origins and it will be for them to determine the weight to give to the importance of the views when considering proposed development in their respective areas. London Plan...."</u>
6.5 Heritage and Culture	BHC2	Mary Duffy	Quintain's developments have destroyed stadium views with Brent Council pandering to their every demand. Boxpark is turning into a white elephant as is the entire build to rent endeavour. Continued FA ownership of this would not have allowed this horrible building project.	The proposed policy has stronger wording on considering the impacts of developments on views.	No Change.
6.5 Heritage and Culture	BHC3	Mary Duffy	Disagree with the Tricycle Theatre being rebranded as The Kiln. Pubs are being lost to developers with little to no thought to their cultural significance. The Queensbury pub is an example of the vandalism unleashed by the Brent Planning Committee.	The Council has no control over what the Theatre chooses for its name. A pub protection policy since 2016 has prevented the loss of pubs, or ensured their re-provision in development. The Council's planning committee refused the redevelopment of the Queensbury on four occasions. The second of these decisions was overturned on appeal. The future of the pub was subject to extensive discussion (around 2 days of the 4 days of the public inquiry). The Inspector considered that the benefits associated with the new pub outweighed the potential harm caused by the loss of the existing. As part of that redevelopment a larger purpose built public house will be re-provided, with defined community access provisions to provide space for voluntary groups at a peppercorn rent.	No Change.
6.5 Heritage and Culture	BHC4	Mary Duffy	Business rates cripple all but the most profitable of bars and restaurants, meaning not much good Brent night time venues	Business rates are set by national government.	No Change.
6.5 Heritage and Culture	BHC5	GLA	Between 2001 - 2017 Brent lost 42% of its public houses. Policy BE4 should seek to protect existing public houses that are of heritage, economic, social or cultural value and should support proposals for new public houses where this would be in accordance with draft London Plan policy HC7. BE4 and BE5 should be amended accordingly, rather than resisting development of new A4 uses including public houses. Reference to the CAMRA Public House Viability Test is welcome.	Policy BHC5 seeks to protect existing pubs. Policy BE4 seeks to protect primary retail frontages, other areas of town centres have sufficient flexibility in their policy to accommodate public houses, which is further reiterated in Policy BHC4 Brent's Night Time Economy in relation to four specific town centres.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.5 Heritage and Culture	BHC5	Mary Duffy	Pubs are being lost to developers with little to no thought to their cultural significance. The Queensbury pub is an example of the vandalism unleashed by the Brent Planning Committee.	A pub protection policy since 2016 has prevented the loss of pubs, or ensured their re-provision in development. The Council's planning committee refused the redevelopment of the Queensbury on four occasions. The second of these decisions was overturned on appeal. The future of the pub was subject to extensive discussion (around 2 days of the 4 days of the public inquiry). The Inspector considered that the benefits associated with the new pub outweighed the potential harm caused by the loss of the existing. As part of that redevelopment a larger purpose built public house will be re-provided, with defined community access provisions to provide space for voluntary groups at a peppercorn rent.	No Change.
6.5 Heritage and Culture	Blank Heritage and Culture	Canal & River Trust	The Grand Union Canal and Welsh Harp reservoir has historical significance that should be better recognised in the Plan. It played a role in the industrial heritage of its adjacent areas. Protection and enhancement of canal infrastructure is important in its own right, as historic transport infrastructure, for example the Twyford aqueduct. Equally, so is the protection and enhancement of the spaces around it, which impact on the setting of the historic canal. Appropriate recognition of the historic significance of the Canal within the Local Plan will support all the aims of paragraph 185 of the NPPF more effectively and be consistent with London Plan policy aims. Further discussions are sought with LB Brent about the designation of a canal conservation area, as is the case in neighbouring boroughs e.g. LB Ealing's Canalside Conservation Area. Designation would help develop and define a sense of place. It would enable more robust protection of its character, including its precise alignment, the route and constant grade of the towpath.	The Council agrees that the canal has some historical significance. As such it will amend the Plan to make reference to this. The majority of the elements that the Trust mentions are under its control, e.g. alignment, route and grade of tow path as in the borough they are on its land.	Paragraph amend: “<u>6.6.30a The River Brent, which gives the borough its name, formed a natural division between Willesden and Wembley. The name ‘Brent’ is Old English, from Celtic words meaning ‘sacred waters’. The River Brent is formed of a number of tributaries which join and flow to the borough of Ealing. Despite much of it being culverted, it is significant to Brent’s history and culture. Just as important are the Grand Union Canal and Brent Feeder Canal which are completely artificial watercourses and important as historic transport infrastructure. By 1820 there was not enough water to supply the canal, so under an Act of Parliament in 1819, the Regent's Canal Company decided to dam the River Brent and create a reservoir, an artificial lake, in order to guarantee a sufficient water supply. These water landscapes are recognised as non-designated heritage assets for their historic significance to protect and enhance cultural and heritage value to Brent. Equally, so is the protection, promotion and enhancement of their curtilage, which impact on the setting of these heritage assets.</u>” Paragraph 6.6.31 amend “<u>Canal Cottage, Twyford Abbey Road</u>

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
					<u>(now in OPDC area) and Reservoir Cottage, in Birchen Grove, are locally listed but much of the twentieth-century development and canal heritage is not protected, and in particular, deserves better recognition. For example, the canal is supported by two aqueducts, one as it passes over the River Brent, the Twyford Aqueduct and the other over the North Circular Road (A406). Other historic features of the canal include a WWII concrete pillbox, bridges and concrete drainage mechanisms. The appropriate....."</u>
6.5 Heritage and Culture	Blank Heritage and Culture	Mary Duffy	The West London Orbital should not go through conservation areas.	The West London Orbital route follows existing rail infrastructure. Works to assist its delivery will predominantly be within the existing rail corridor.	No Change.
6.5 Heritage and Culture	Blank Heritage and Culture	Thersa	Culture: Support need for more arts and culture. It is a shame Bridge Park needs to be redeveloped as has had short shelf-life, wasting public money. Buildings should last at least 50 years, something which should be written into contract.	Culture: Bridge Park was delivered through the conversion of an existing building. Its redevelopment allows for a much better facility to be built that meets a wider range of recreational needs. It will be built to BREEAM excellent status as a minimum and as such should be durable for a significant period.	No Change.
6.5 Heritage and Culture	Blank Heritage and Culture	John Cox	(3) There is one "Section 6.2" on pages 281 and another "Section 6.2" on page 329. One Section 6.2 is enough, thank-you.	3. 6.2 Heritage and Culture should be 6.5	3. Heritage and Culture Chapter cover page amend: " ~~6.2~~ 6.5"

6.6 GREEN INFRASTRUCTURE

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.6 Green Infrastructure	Para 6-6-10	Environment Agency	Recommend amendment to accurately reflect the watercourses in LBB: “6.6.10 Brent’s existing blue infrastructure or Blue Ribbon Network, includes the River Lower Brent, Welsh Harp, Grand Union Canal - Uxbridge to Hanwell Locks, Slough Arm, Paddington Arm, Wealdstone Brook, Brent Feeder Canal and Dollis Brook and Upper Brent.”	Noted. See proposed changes.	Paragraph 6.6.10 amend: "Brent’s existing blue infrastructure or Blue Ribbon Network, includes the <u>River Lower Brent</u> , <u>Welsh Harp</u> , Grand Union Canal <u>Paddington Arm</u> , Wealdstone Brook, Brent Feeder Canal and Dollis Brook <u>and Upper Brent</u> ."
6.6 Green Infrastructure	BGI1	Environment Agency	• Pleased to see section d). We recommend that as part of this policy or supporting statements, the DEFRA Biodiversity Metric on net gain is referenced. The DEFRA Biodiversity Metric 2.0 provides a way of consistently measuring and accounting for biodiversity losses and gains resulting from development or land management change.	The DEFRA Biodiversity Metric 2.0 is noted. It is considered that point d) is sufficient to ensure a net gain of biodiversity is achieved through development and ensures that the policy is future-proof with regard to any potential changes or improvements to tools used to measure and account for biodiversity losses and gains. Nevertheless the inclusion of reference to the Defra Biodiversity Metric 2.0. in OTHER GUIDANCE is considered appropriate.	Make reference to the Defra Biodiversity Metric 2.0. as set out in the response to Natural England.
6.6 Green Infrastructure	BGI1	Environment Agency	• Section g) Welcome the inclusion, however we recommend the statement is strengthened to ensure development does not impede achieving the future goals of the environmental improvement objectives of the Water Framework Directive and Thames River Basin Management Plan.	It is considered that the existing wording is sufficient in requiring development to seek to enhance water quality and biodiversity in accordance with the objectives of the Water Framework Directive and Thames River Basin Management Plan. This is considered to be in line with the draft new London Plan, which states that Development Plans should promote the protection and improvement of the water environment in line with the Thames River Basin Management Plan.	No Change.
6.6 Green Infrastructure	BGI1	Environment Agency	• In Reg 18 response we highlighted our desire for the plan to specifically address the risk of INNS. In the Brent Local Plan Preferred Options Consultation Responses, October 2019 stated this matter is addressed in relation to policy BGI1 Green and Blue Infrastructure. We however do not believe the policy does directly address this issue and we recommend it is amended to include additional wording to combat the potential harmful impact of INNS on people, places and the environment. We recommend Policy BGI1 is amended to include how developments will manage and if possible eradicate invasive non-native species for the safe enjoyment of green and blue spaces.	It is considered that the management and eradication of non-native or invasive species could be considered at detailed application stage of any schemes coming forward, and could be managed as part of a CEMP on a site by site basis, rather how such risk would be managed being outlined in policy.	No Change.
6.6 Green Infrastructure	BGI1	Woodland Trust	• We support that residential developments should have access to the natural environment, including to woodland. The Woodland Trust has developed a Woodland Access Standard to complement Natural England’s Accessible Natural Green Space Standard. We recommend that: - o No person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size. - o At least one area of accessible woodland of no less than 20ha within 4km (8km round trip) of people’s homes.	Recommended guidance noted. The recommendations regarding residents not having to live more than 500m from one area of accessible woodland of no less than 2ha in size and there being at least one area of accessible woodland of no less than 20ha within 4km of people's homes is noted, however, the borough's urban nature and limited land availability coupled with being designed as a 'provide industrial capacity' borough and need to provide housing means that meeting these recommendations would be a challenge and realistically undeliverable given the demands on land.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.6 Green Infrastructure	BGI1	Woodland Trust	o We further recommend adding that a target tree canopy cover of at least 20 per cent will be pursued through the retention of important trees, appropriate replacement of trees lost through development, ageing or disease and by new planting to support green infrastructure.	The draft new London Plan outlines the Mayor's target of increasing tree canopy cover in London by 10% by 2050. Given the constraints that Brent faces in terms of land availability, a target of 20% is not considered to be realistic, however the Mayor's Greener City Fund continues to plant trees in the borough and the council will continue to support tree planting through Neighbourhood CIL and S106.	No Change.
6.6 Green Infrastructure	BGI1	Mary Duffy	The policy neglects to mention Neasden Recreation Ground. Brent has not cut the grass in two years and the residents clear the litter from the park. Brent should in-house its parks service as Veolia has neglected its maintenance. It seems to be a deliberate policy of managed neglect. Whereas nearby Gladstone Park gets classed as an "ornamental park". It has been featured on News at Ten and "You and Yours" on Radio 4 with myself guiding Tom Clarke around what is a SSSI that has not been visited by Natural England in over 6 years. Brent had allowed it to become a homeless camp until residents cleaned it up. The chair of Natural England later resigned when the collective negligence of Natural England and Brent Council had been exposed.	The policy does not mention the existence of Neasden Recreation Ground as it seeks to ensure that future development protects and enhances existing green and blue infrastructure, and sets out expected open space provisions (or associated contributions) and criteria to be met from new developments. Neasden Recreation Ground is shown on the proposed policy maps and is designated as both Metropolitan Open Land and Open Space. The management arrangements of Neasden Recreation Ground, or other existing recreation grounds which are managed by the Council, are not a material planning consideration matter for the Local Plan.	No Change.
6.6 Green Infrastructure	BGI1	Department for Education	Policy requires major developments to provide public open space. This implies it only relates to residential development by reference to a ratio against the residential population. It should be made clear that this is only in reference to residential developments, stating 'major residential developments...'	The policy in terms of standards does only apply to residential development, as such the proposed change is considered appropriate.	BGI1 amend: ".....Major <u>residential</u> developments outside Growth Areas will be expected to provide 0.81 sqm of public open space per resident in the following manner:....."
6.6 Green Infrastructure	BGI1	Environment Agency	Agree with the policy, find it sound and pleased to see sections addressing enhancement of blue infrastructure, landscaped setback, biodiversity net gain, water quality and seeking enhancements under the Water Framework Directive and Thames River Basin management Plan.	Noted that the policy is considered to be sound.	No Change.
6.6 Green Infrastructure	BGI1	Environment Agency	• Set-back: Welcome the inclusion of Paragraph 6.6.30. For clarity, we recommend that the 8 metre set back requirement is referenced in the main policy text to ensure it is clear for users.	As noted in paragraph 6.6.30, the 8m set back is a EA requirement, which is subject to byelaw and agreement separately with the EA. The council does not consider the need for this to be replicated within this policy. Sites which are at risk of flooding will be required to submit a Flood Risk Assessment and will therefore be assessed on a case by case basis in accordance with national policy, the new draft London Plan, and local plan policy BSUI3.	No Change.
6.6 Green Infrastructure	BGI1	Natural England	We welcome policy inclusion for achieving net gain in biodiversity for all developments. When delivering this policy we recommend use of • Natural England's recently released Defra Biodiversity Metric 2.0. Detailed guidance and a tool to apply the metric is available. • The incorporation of the 10 best practice principles developed by CIRIA/CIEEM/IEMA for those delivering biodiversity net gain. We welcome policy inclusion for retaining existing blue and green infrastructure and adding/enhancing where possible. • A strategic approach for green infrastructure is required to ensure its protection and enhancement, as outlined in para 171 of the NPPF. Evidence of a strategic approach can be underpinned by Green	Support Reference to the Defra Biodiversity Metric 2.0. will be made, as well as 10 best practice principles developed by CIRIA/CIEEM/IEMA for those delivering biodiversity net gain in Other Guidance.	After the Evidence Base section amend: "OTHER GUIDANCE Biodiversity Metric 2.0. DEFRA/ Natural England Biodiversity net gain. Good Practice Principles for Development. A Practical Guide CIRIA/CIEEM/IEMA"

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
			Infrastructure Strategy. Please refer to Chapter 8 of the draft London Plan for further policy guidance when delivering the Local Plan.		
6.6 Green Infrastructure	BGI1	Woodland Trust	- We welcome the retention and enhancement of existing trees, woodland, and hedgerow cover on development sites, and an appropriate number of suitable replacement trees will be required to be planted. - We recommend setting a proposed ratio of tree replacement, which reflects the Woodland Trust guidance on Local Authority Tree Strategies (July 2016) with a ratio of at least 2:1 for all but the smallest trees and ratios of up to 8:1 for the largest trees.	Rather than proposing set ratios for replacement, it is considered that that requirement b) of policy BGI will ensure that new trees / replacement trees will achieve equivalent canopy cover (or a financial contribution for off-site tree planting of equivalent canopy cover). The council considers that this allows for more flexibility than applying replacement ratios. The draft new London Plan policy G7 also requires replacement trees to provide adequate replacement based on the existing value of trees removed as determined by an appropriate valuation system such as i-tree. The council acknowledges that it does not have full knowledge of the existing tree stock and that developing a database such as i-tree Eco will enable setting future targets and focusing on tree-deficient areas. In addition the urban greening factor has a favourable score against trees which should promote their inclusion in developments.	No Change.
6.6 Green Infrastructure	BGI1	Woodland Trust	- Integrating trees and green spaces into developments early on in the design process minimises costs and maximises the environmental, social and economic benefits that they can provide. - We recommend the guidance published by the Woodland Trust Residential developments and trees - the importance of trees and green spaces (January 2019).	The council agrees that integrating trees into developments early provides benefits and paragraph 6.6.40 of the local plan states that trees should be designed into a development scheme from the outset to support this.	No Change.
6.6 Green Infrastructure	Para 6-6-34	Environment Agency	This paragraph states: "The Water Framework Directive is a European Union Directive which commits all member states to achieving a 'good' status' for all water bodies by 2027." Suggested amendment: all member states are required to achieve 'Good' status or 'Good Ecological' status by 2021, or if an extension is granted, then 2027.	Noted. See proposed change.	Paragraph 6.6.34 amend: "The Water Framework Directive is a European Union Directive which commits all member states <u>are required</u> to achieve ~~achieving a~~ 'good' status' or 'good ecological' status by 2021, or if an extension is granted, then ~~for all water bodies~~ by 2027."
6.6 Green Infrastructure	Para 6-6-36	Environment Agency	Pleased to see reference to deculverting and naturalising watercourses. However, strongly recommended the wording is amended to: these measures are desirable for all development adjacent to watercourses and should be considered wherever possible, not just as a mitigation measure. This is important in achieving the requirements of Policy BGI1 in meeting the objectives of the Water Framework Directive and Thames River Basin Management Plan.	Noted. See proposed change	Paragraph 6.6.35 amend: "In Brent <u>all</u> waterside developments and other developments....." Paragraph 6.6.36 numbering amend: " ~~6.6.36 a)~~ " and remainder of bullets subsequent.
6.6 Green Infrastructure	Para 6-6-36	Environment Agency	Formatting error: The first line of paragraph should be point a), and not a new numbered paragraph.	Noted. See proposed change	Paragraph 6.6.36 numbering amend: " ~~6.6.36 a)~~ " and remainder of bullets subsequent.
6.6 Green Infrastructure	BGI2	Mary Duffy	Lack of common sense where contractors see trees as an expense.	Policies in relation to Council's wider the management (cutting down, pruning etc.) of existing trees are not a material planning consideration matter for the Local Plan. Information on Brent's tree management strategy can be found here: https://www.brent.gov.uk/services-for-residents/environment/trees-hedges-and-grass-maintenance/	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.6 Green Infrastructure	BGI2	Department for Education	Policy requires the re-provision of canopy cover or off site contributions. This does not differentiate between the different quality of trees, and could therefore lead to onerous burdens for the delivery of educational facilities where such requirements may be difficult to deliver given the size, nature and scale of educational facilities footprints and open space requirements which typically do not allow for extensive tree planting. This may also create safeguarding and management issues for school operators. This policy should therefore be flexible when applied to infrastructure, community and recreation uses.	Brent considers trees and woodlands to be vital components of the borough's landscape and green infrastructure with associated benefits. As noted in the representation, quality of trees can vary, but the London Plan encourages the "Right Tree for a Changing Climate" approach. The council supports this, and this policy will allow for poor-quality trees to be replaced or re-provided elsewhere with newly planted trees which will thrive in a changing climate. It is considered that the policy already allows for sufficient flexibility where retention or re-provision is not possible on site for an off-site financial contribution towards off-site tree planting to be made.	No Change.
6.6 Green Infrastructure	BGI2	Woodland Trust	Recommendation to add a new point to include explicit protection for ancient woodland and veteran trees: • 'f) Development which would result in the loss of ancient woodland, aged or veteran trees should not be permitted.' • Where development sites are adjacent to ancient woodland, a precautionary principle of minimum 50-metre buffer should be maintained including through the construction phase, unless the applicant can demonstrate very clearly how a smaller buffer would suffice. A larger buffer may be required for particularly significant engineering operations, or for after-uses that generate significant disturbance. Justification: • Ancient woods are reservoirs of biodiversity that are highly fragmented and irreplaceable. They are our richest terrestrial wildlife habitats, with complex, unique and vulnerable ecological communities developed over centuries. • The National Planning Policy Framework (NPPF) (paragraph 175c) states: "When determining planning applications, local planning authorities should apply the following principles: c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists". • There is no appropriate mitigation for the loss of irreplaceable habitats. Direct impacts that would lead to damage or loss of ancient woodland habitat or veteran trees must either be avoided or compensated for if the need is truly exceptional.	There is no ancient woodland in the borough, but the borough does contain a number of veteran trees. The council considers that trees and woodlands are vital components of the borough's landscape and green infrastructure. However, as noted, paragraph 175(c) of the NPPF already states that development resulting in the loss or deterioration of ancient woodland and ancient or veteran trees should be refused unless there are wholly exceptional reasons and a suitable compensation strategy exists. The council considers that national policy affords enough protection of such trees and that this does not need to be repeated in the local plan.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.6 Green Infrastructure	BGI2	Mary Duffy	Not planting enough trees and cutting down healthy mature trees receiving widespread protest from residents. Lack of common sense where contractors see trees as an expense	The Council recognises the importance of trees and woodlands within the borough, and local plan policies seek to ensure that existing trees are protected, retained or replaced on proposed development sites, and if not possible, for a financial contribution to be made for off-site provision. The Mayor's Greener City Fund continues to plant trees in the borough and the council will continue to support Community Tree Planting Grants through NCIL (Neighbourhood Community Infrastructure Levy) and S106 contributions and the supporting text of BGI2 notes that wherever possible, opportunities to increase the borough's tree population will be taken. Policies in relation to Council's wider the management (cutting down, pruning etc.) of existing trees are not a material planning consideration matter for the Local Plan. Information on Brent's tree management strategy can be found here: https://www.brent.gov.uk/services-for-residents/environment/trees-hedges-and-grass-maintenance/	No Change.
6.6 Green Infrastructure Page 747	Blank Green Infrastructure	Thersa	Green infrastructure: The environment, and education about it should be our top priority, and should be at the heart of every Council undertaking. Suggestions include community gardens and allotments. All public spaces should have posters encouraging people to become greener and advocating less consumption. All public spaces should use green energy and avoid waste, including the removal of flat screen displays at the Council run facilities.	Green infrastructure: Agreed the Plan supports community gardens and allotments and in association with policies in the London Plan will deliver more and higher quality green infrastructure in new development.	No Change.

6.7 SUSTAINABLE INFRASTRUCTURE

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.7 Sustainable Infrastructure	BSI1	Andrea Diez	Regeneration will be great in Willesden Green, Queens Park, Brondesbury Park, South Kilburn, Stonebridge Park and Kensal Green.	Support welcomed.	No Change.
6.7 Sustainable Infrastructure	BSI1	Theatres Trust	We are pleased to see the change of wording from 'viable' to 'no longer required'	Support welcomed.	No Change.
6.7 Sustainable Infrastructure	BSUI1	Department for Education	Concerned over requirement for BREEAM excellent as we wish to maximise value for money, making efficient use of public funds and question whether it is justified to expect schools to achieve excellent as opposed to very good. The delivery of schools should not be burdened by challenging obligations, particularly with regards to expansions as existing buildings may be difficult to retrofit to meet standards. Therefore the policy should be made flexible in respect to schools and community buildings, especially with regards to expansion.	It is considered that the need for non-residential institutions - including schools and community buildings - to achieve a BREEAM standard of "Excellent" is justified and that it is not appropriate to reduce the standard. London Plan policy SI2 requires that major development should be net zero-carbon towards the aim of London becoming a zero-carbon city, and this will be extended to include major non-residential developments on final publication of the London Plan. At a local level it is anticipated that climate change will have a significant impact on Brent without the implementation of mitigation and adaptation measures, and obligations such as the requirement for buildings, including schools, to achieve BREEAM standard of "Excellent" is necessary to ensure that net zero-carbon can be achieved. In addition it should be used in a positive way to highlight to children the issue of sustainable development and resource management. Furthermore, this is considered to be a short-term outlook rather than concerning the whole life-cycle of the property including on-going running costs, or potential future improvements which may be required to bring the property up to even higher environmental standards (if introduced in future). The council also considers that particularly if it is considered at the outset of a project, such projects can be achieved without adding substantial additional cost. If costs are prohibitive then the Council may agree a lower standard if specific priority measures can be achieved taking account of the site's characteristics.	No Change.
6.7 Sustainable Infrastructure	BSUI1	Environment Agency	Pleased to see the policy.	Support welcomed.	No Change.
6.7 Sustainable Infrastructure	BSUI1	Natural England	Pleased to see the policy. If creating a Green Infrastructure Strategy for the borough, consider climate change. Natural England will be publishing a 2nd edition of its Climate Change Adaptation Manual which will include a Landscape Scale Climate Change Assessment Tool. This tool can be used to identify natural assets (e.g. different habitats and species) in the borough and identify adaptation responses that can be incorporated into a plan to create a resilient landscape across the borough.	Support welcomed.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.7 Sustainable Infrastructure	BSUI1	St. George	Policy is not sufficiently flexible, not justified, effective, or consistent with national policy. Proposed modification: Within Growth Areas, all major developments shall connect to or contribute towards a decentralised energy system unless it can be demonstrated that such provision is not feasible, or the proposed heating system is 100% renewable. Reasoning: The policy wording is ambiguous and implies all major development, including those outside the Growth Areas, will be required to connect and contribute to a decentralised energy system. Evidence base: It is important that the approach of the Regulation 19 Local Plan allows enough flexibility to respond to the objectively assessed needs of Brent, and its population	It is correct that the policy does suggest that all major developments - including those outside of growth areas - should connect to or contribute towards a decentralised energy system. However, the policy also allows flexibility in acknowledging that such connections or contributions may not be feasible in some circumstances, or if the proposed heating system is not 100% renewable. It is therefore considered that the policy wording is not ambiguous, and allows for flexibility in circumstances where a decentralised energy system may not be practical. The policy is considered to be justified in order to reach zero-carbon and to help create a resilient and efficient Brent, and is considered to be effective in ensuring that opportunities to increase efficiency are taken advantage of while recognising that there may be no suitable opportunities in certain circumstances. Finally, the policy is consistent with national policy in that it plans effectively for climate change. The Council considers that the strategy set out in the Local Plan for growth, new homes, employment, facilities and infrastructure does so in a way that meets the area's objectively assessed needs while allowing for flexibility in certain circumstances.	No Change.
6.7 Sustainable Infrastructure	BSUI1	Quintain	Maintain objection to Policy BSUI1 as these matters are covered in more detail in either the site specific allocations for the Growth Areas or the London Plan and therefore do not need to be repeated. The policy should therefore be deleted.	It is not considered that matters contained within BSUI1 are covered entirely within the site specific allocations, as the Local Plan should provide guidance for windfall sites which may come forward outside of the site specific allocations. Additionally, while London Plan policy SI 2 outlines the requirement for major development to be zero carbon and suggests how this can be achieved via the energy hierarchy, and while SI 3 states that development plans should identify suitable sites for energy infrastructure, SI 3 also requires development plans to identify need for such energy infrastructure requirements. In response to this, BSUI1 identifies a need for all major developments to connect to or contribute towards a decentralised energy system and to submit a Sustainability Statement. It is therefore considered that local plan policy BSUI1 is necessary, as it outlines Brent's approach to energy infrastructure requirements at a local level which would not be able to be achieved by falling back entirely on London Plan policy.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.7 Sustainable Infrastructure	BSUI1- BSUI2	Robin Sharp	The Local Plan needs more emphasis on ‘action’ to meet the Climate Emergency and the Air Quality challenges in London. Actions to reduce road journeys by individual private cars where daily commuting is involved and public transport alternatives are available. Reference to recent reports on air quality in Brent: 1) Study 1: The first is ‘Getting Ready for the Extended ULEZ 2021: Imperial College/Clean Air for Brent 2019.Section 3.4’. (for detail refer to original comment) This shows in Figure 16 in section 3.4 that Transport for London predict that the ULEZ 2021 will reduce air pollution in Brent by NO2 by 36%, with greater reductions within the ULEZ and lower reductions on and north of the North Circular. The credibility of these predictions is re-inforced by the monitoring results from the first 6 months of the Central London ULEZ, which has been very successful. 2) Study 2: The second report is Brent Breathes: the Report of the Air Quality Scrutiny Inquiry 2019 available on the Brent website. 3) Brent is vulnerable to through commuting traffic – see A Study of Air Quality in Brent: Imperial College/Clean Air for Brent 2018, section 3.8. Shows in peak hour, 55% of traffic on A404 in Harlesden and 64% traffic in Chamberlayne Road had its origin and destination outside Brent. 4) The ULEZ 2021 extension is predicted to reduce commuting through Brent by non-compliant diesel and petrol cars significantly. However, the population growth of 60,000 will negate this beneficial effect. Recommended change in 3.32: Add reflection of study (1) to replace ‘Its use as the boundary of the extended Ultra-Low Emissions Zone to be introduced in 2021 is unclear in terms potential changes on these adverse impacts.	There is significant reference to the issue of Air Quality in the Local Plan, with a specific policy on air quality standards associated with major developments within the borough (Policy SUI2 Air Quality), whilst smaller developments will be subject to London Plan Policy SI 1 Improving Air Quality. The Council's overall plan is to reduce reliance on the private car and this is reflected in policies around locations of development, promotion of car free developments and parking standards, whilst promoting Healthy Streets design principles and also supporting projects such as the West London Orbital. Policies within the London Plan related to sustainability within developments with a move away from gas and other carbon powered combined heat and power systems to those in which local emissions will no longer be generated. Whilst the issue is clearly important, it is considered that in terms of planning impacts, the Local Plan together with the London Plan provides an effective mechanism to assist in improving air quality within Brent and its adjoining neighbours.	Paragraph 3.32 amend: “...Its <u>will be used</u> as the boundary of the extended Ultra-Low Emissions Zone to be introduced in 2021_ ~~is unclear in terms potential changes on these adverse impacts.~~ <u>Transport for London predict that the ULEZ 2021 will reduce air pollution in Brent by NO2 by 36%, with greater reductions within the ULEZ and lower reductions on and north of the North Circular.</u>

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.7 Sustainable Infrastructure	BSUI2	Clean Air London	CAL asks you please to take account of the following strong evidence and excellent work done by others: 1. Brent Breathes: Report of the Resources and Public Realm Scrutiny Committee: Air Quality Scrutiny Inquiry (December 2019). 2. The Knightsbridge Neighbourhood Forum (which I chair): https://www.knightsbridgeforum.org https://www.knightsbridgeforum.org/media//documents/knp_made_version_december_2018_131218_website.pdf https://www.knightsbridgeforum.org/planning/best-practice-guidance/ (e.g. see the construction guidance) 3. Please identify all significant sources of fossil fuels (eg CHP plants) and produce a plan to abate their emissions and eliminate those units. We need action on wood burning and warnings of air pollution episodes. 4. Clean Air in London's submissions to the London Plan EiP (two attached). 5. Key messages from UN Environment's sixth Global Environment Outlook (where I was the air pollution stakeholder on the Steering Group) (attached). 6. The City of London's Air Quality Strategy 2019 – 2024 which includes 65 practical measures. https://www.cityoflondon.gov.uk/business/environmental-health/environmental-protection/air-quality/Documents/City-of-London-Air-Quality-Strategy-2019-2024.pdf 7. Push for zero air emissions https://www.theccc.org.uk/publication/net-zero-the-uks-contribution-to-stopping-global-warming/#key-findings Please also keep and build upon the Air Quality Positive approach whether or not the London Plan includes it.	Noted. The Plan seeks to ensure that walking and cycling are prioritised as modes of transport and reduce the need to travel. Planning policy can only apply where developments need planning permission and the policy is reasonably related to the development that is being proposed. Whilst energy sources for developments will soon move away from carbon reliant sources within large developments, planning will for example not be able to stop occupants of dwellings installing wood-burning stoves if planning permission is not required, and the acceptability of the emissions is considered acceptable under other legislation. This is a matter that will have to be addressed through national legislation related to air quality in urban areas/ clean air zones. The Council is working on an air quality strategy which will pull together all its actions into a consolidated approach to improving air quality in the borough.	No Change.
6.7 Sustainable Infrastructure	BSUI3	Mary Duffy	Flooding is prevalent at the bottom of Blackbird Hill, especially in basements on Braemar Avenue alongside the canal and coombe road as these areas are within the River Brent floodplain. No developments should be built in a floodplain.	The Council is not promoting new development on greenfield floodplain. Where it is allocating previously developed sites within the floodplain, these will be subject to a sequential test and there will be an opportunity to reduce the impact of flooding on and off-site through appropriate design and attenuation measures compared to the impacts of their existing development.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.7 Sustainable Infrastructure	BSUI3	Environment Agency	We support the policy and agree with points a) - e), however we have concerns sufficient to find Policy BSUI3 Managing Flood Risk unsound for the following reasons: Reason 1 Policy BSUI3 states: “Proposals requiring a Flood Risk Assessment...” It is unclear what these proposal are and when a Flood Risk Assessment (FRA) will be required. It is presumed this is in line with the National Planning Policy Framework (paragraph 163, footnote 50), however this should be clarified within the policy, to ensure compliance with national policy. Recommended changes: • It should be clarified within the policy what developments will require an FRA to ensure compliance with national policy.	Reason 1: Paragraph 6.7.37, under "Information in support of planning applications", outlines where a FRA is required.	After paragraph 6.7.35 amend: "<u>6.7.35a In exceptional circumstances and consistent with national policy outputs there may be occasions where development in the functional floodplain is required. For the most part this is likely to be only for water compatible uses. Nevertheless, due to development that has occurred in Brent in what would otherwise have been functional floodplain, there may be exceptional circumstances where it is appropriate for small incursions into the functional floodplain to be considered acceptable in principle if it has other significant benefits in relation to watercourse environment or risk of flooding. Examples could be returning a larger area to functional floodplain, or reducing the likelihood of impediments to river flow that might currently exist, such as stilts holding up buildings over a watercourse. Where any intervention that is defined as development in the functional floodplain occurs, the council will also seek the opportunity to improve through that development the environmental quality of the watercourse.</u>" Reason 3: Policy BSUI3 amend: "<u>....surface water flooding. Proposed development must pass the sequential and exceptions test as required by national policy. The design and layout.....</u>" Paragraph 6.7.5 amend: "<u>....as well as devastating environmental impacts. Brent is susceptible to flooding from different sources. Fortunately, over the last twenty years, Brent has not experienced major flooding from its brooks and rivers, with the most recent events....</u>"

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.7 Sustainable Infrastructure	BSUI3	Environment Agency	Reason 2 The policy also states: “Opportunities will be sought from the redevelopment of sites in functional floodplain (flood zone 3b) to restore the natural function and storage capacity of the floodplain.” It is unclear from the local plan and associated documents what is considered as developed functional floodplain and would therefore be considered suitable for ‘redevelopment’. It is unclear what types of developments may be suitable for such sites, if undeveloped functional floodplain will not be considered, when the policy will be applied, what criteria must be met and whether this may contradict national policy, in terms of compatibility and the sequential approach. Without clarity on these points, we consider this policy is not effective, unclear on its deliverability and confusing for developers and site owners. Please note that only water compatible uses and essential infrastructure are compatible with flood zone 3b. Changes: • The deficiencies highlighted above should be addressed and included within Policy BSUI3 to provide additional clarification on the redevelopment of sites within the functional floodplain.	Reason 2: Brent is a heavily developed borough and much of what would have previously been functional floodplain is already developed, so technically removed from functional floodplain. In addition existing functional floodplain can include structures, etc which might be water-compatible uses. Consistent with national policy it is anticipated that the type of redevelopment which would be suitable for such sites would be essential infrastructure, re-development of already water compatible uses and dealing with structural elements of existing drainage channels, e.g. culverts. Improvements could be made to those already compatible uses in order to restore the natural function and storage capacity of the floodplain. In addition for some development that might currently displace what would otherwise be functional floodplain, there might be opportunities with some minor incursions into existing functional floodplain to increase functional floodplain overall, or reduce the risk of flooding through for example reducing the likelihood of blockages to efficient flow in times of flood. A good recent example of this is the Argenta House redevelopment which proposed some development in the existing functional floodplain, but was able to rationalise other structures and return some of the site to functional floodplain, plus create biodiversity improvements by changing what was a heavily engineered/ unsympathetic channel. The council is not seeking to promote development of non-compatible uses in flood zone 3b to undermine, merely identifying that in heavily built up locations on what might have previously been functional floodplain, incursions might be desirable in existing functional floodplain that have a net overall benefit, either to reduce floodrisk or enhance the environmental quality of the floodplain/watercourse or both. Any applications for development meeting the requirements of paragraph 6.7.37 would be assessed in accordance with national policy, the sequential and exceptions test and local plan policy BSUI3. Together these policies would ensure that predominantly only water-compatible development takes place within the functional floodplain, but it also recognises that other interventions might be appropriate. An explanation in the policy justification can reduce confusion.	After paragraph 6.7.35 amend: " <u>6.7.35a</u> <u>In exceptional circumstances and</u> <u>consistent with national policy outputs</u> <u>there may be occasions where</u> <u>development in the functional floodplain</u> <u>is required. For the most part this is likely</u> <u>to be only for water compatible uses.</u> <u>Nevertheless, due to development that</u> <u>has occurred in Brent in what would</u> <u>otherwise have been functional floodplain,</u> <u>there may be exceptional circumstances</u> <u>where it is appropriate for small incursions</u> <u>into the functional floodplain to be</u> <u>considered acceptable in principle if it has</u> <u>other significant benefits in relation to</u> <u>watercourse environment or risk of</u> <u>flooding. Examples could be returning a</u> <u>larger area to functional floodplain, or</u> <u>reducing the likelihood of impediments to</u> <u>river flow that might currently exist, such</u> <u>as stilts holding up buildings over a</u> <u>watercourse. Where any intervention that</u> <u>is defined as development in the</u> <u>functional floodplain occurs, the council</u> <u>will also seek the opportunity to improve</u> <u>through that development the</u> <u>environmental quality of the</u> <u>watercourse."</u>

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.7 Sustainable Infrastructure	BSUI3	Environment Agency	Reason 3 Paragraph 157 of the NPPF states the requirement for a sequential risk-based approach to the location of development, and application of the sequential test to steer development towards areas at the lowest risk of flooding. For Policy BSUI3 to be compliant, it must reference the requirement for development sites to pass the sequential and exception tests as set out in PPG and that development should not be allocated or permitted if there are reasonably available sites at a lower risk of flooding. Changes: • Policy BSUI3 should be amended to reference the requirement for development sites to pass the sequential and exception tests and that development should not be allocated or permitted if there are reasonably available sites at a lower risk of flooding.	Reason 3: Noted. See proposed change to policy. From this it follows that development will not be permitted if there are reasonably available sites in areas of lower flood risk.	Reason 3: Policy BSUI3 amend: "....surface water flooding. <u>Proposed development must pass the sequential and exceptions test as required by national policy.</u> The design and layout....."
6.7 Sustainable Infrastructure	BSUI3	Environment Agency	Accuracy Point: Paragraph 6.7.5 & 6.7.7: This paragraph states, that there has been no major flooding in the borough in the last 20 years, however paragraph then 6.7.7 states there have been multiple instances of sewer flooding over the last 5 years. These statements appear to be contradictory, and we recommend that 6.7.5 is revised to make it clear that the borough is susceptible to flooding from different sources, but has not experienced any major flooding from rivers in the last 20 years.	See proposed change.	Paragraph 6.7.5 amend: "....as well as devastating environmental impacts. <u>Brent is susceptible to flooding from different sources.</u> Fortunately, over the last twenty years, Brent has not experienced major flooding from its brooks and rivers, with the most recent events...."
6.7 Sustainable Infrastructure	BSUI4	Environment Agency	We support this policy around management of surface water and water resources. We support the inclusion of water consumption targets, the target of greenfield runoff rates for surface water, which is consistent with the relevant London Plan policies, and the requirement for a drainage strategy for all development that may impact on the current drainage regime. This is further backed up by paragraphs 6.7.40, 6.7.41 and 6.7.42.	Support welcomed.	No Change.

6.8 TRANSPORT

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.8 Transport	BCSA7	John Cox	Wembley Park Station: Crossrail protected the Dudding Hill Line and projected flyover across the Chiltern Main Line to the Chiltern Aylesbury Branch at the Neasden Stations Growth Area site in the 1990's. The Chiltern Aylesbury Branch will soon be reopening the Oxford-Cambridge extension, and eventually Silicon Fen. The Plan should continue to protect this function for outline within the Neasden Stations Masterplan. Funding for the masterplan has been increased by a bid to the London Strategic Investment Pot, making £960,000 available for the WLO boroughs. The plans of the 90s provide an alternative route to Old Oak Common and Crossrail from Buckinghamshire. This must be considered as an alternative route, considering connection with the Northwick Park chord at Willesden Junction Low-Level Station. Both routes wouldn't be required but capacity should be provided in the Neasden masterplan. This alternative would be faster but perhaps more expensive. It should be mentioned in the Plan. Any such project would likely add new platforms on the Chiltern Aylesbury Branch at Wembley Park Station, benefitting the area. It would also provide a choice for Aylesbury passengers among others, between Marylebone and a new, easy interchange with Crossrail to central London via the Dudding Hill Line at the Old Oak Common Lane Station. For this possibility I object to BCSA7. London Underground own the land and should not be able to develop until the required strip of land on its eastern edge is protected. This will then align with the protection of operational railway land outlined within the DNLP.	The protection of land to enable a projected flyover across the Chiltern Mainline to the Chiltern Aylesbury Branch at the Neasden Stations Growth Area site is not considered appropriate given that there is no credible plan for its delivery. It has the potential to cause significant uncertainty and sterilise land that could otherwise be used productively. The potential for new platforms at Wembley Park Station appears to exist within the boundaries of the existing operational rail land. Nevertheless, the issue of not compromising future delivery through consideration of this potential has been raised with TfL in relation to pre-application discussions on the southern site. As such incorporation of this issue within policy BCSA7 is considered appropriate.	Policy BCSA7 planning considerations amend: " <u>The development should not compromise the ability to add potential platforms at Wembley Park station on the Chiltern Line Aylesbury Branch.</u> "
6.8 Transport	BCSA7	John Cox	In addition, the PLACE in chapter 5.5 is missing.	Add reference to "Place" on the South chapter heading	Chapter heading amend: "5.5 SOUTH <u>PLACE</u> "
6.8 Transport	BCSA7	John Cox	Oppose. Sidings owned by TFL who should not be allowed to develop this operational railway land as it is protected for possible future passenger use in the DNLP. I personally supported the Mayor's position on this at DNLP EiP. Protection of this land is not dependant on allocating specific uses. The site would however be a suitable site for maintenance and stabling depot for a future North London Tram system. The land is publicly owned and should remain this way, not being sold off for short term gain.	Whilst the sentiment of the representation is understood, there is no formal proposal for a North London Tram system. It is not identified as even a longer term proposal within the London Plan. Consistent with national policy it is not considered appropriate for the Council to seek the retention of this site for transport purposes when the site has been promoted by its owner for development, where there is no reasonable prospect of it being identified for an alternative transport use over the lifetime of the Plan.	No Change.
6.8 Transport	BD3	Mary Duffy	The WLO should not be used to justify tall building development.	The WLO will improve public transport accessibility, this supports but is not solely the reason that areas are identified for tall buildings. The areas considered appropriate for tall buildings in any case for the most part either have, or will have better levels of public transport which make them an appropriate place for higher density development, this will be the case even if the WLO is not delivered.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.8 Transport	Para 6-8-6- figure 37-	OPDC	The text should reflect the status of the West London Orbital line project.	Agreed reference should be made to the future work on station locations and connectivity.	Paragraph 6.8.6 amend: "....A pedestrian route over the A5 is needed to connect Brent Cross West station to Staples Corner. <u>The precise location of the WLO stations will be firmed up as the project progresses. When there is more certainty on their location more detailed work can be done on improving their connectivity to surrounding areas. TO the south.....</u> "
6.8 Transport	BT1	TfL Spatial Planning	Reference to London Plan standards is necessary to ensure that quantitative as well as qualitative standards are met. Policy BT1c) required change: "cycle parking in line with or exceeding London Plan standards and TfL and Westrans design standards."	Changes suggested are considered appropriate.	BT2 amend "c).....in line with or exceeding <u>London Plan standards</u> and TfL and WestTrans design standards..."
6.8 Transport	BT1	TfL Spatial Planning	The text in paragraph 6.8.16 needs to be corrected to refer to cycle parking standards in London Plan policy T5 (not T6)'	Changes suggested are considered appropriate.	Paragraph 6.8.16 amend: "....cycle parking are set out in London Plan policy ~~T6~~ <u>T5</u> ."
6.8 Transport	Figure 38	OPDC	More extensive cycle routes are shown in OPDC's Local Plan.	Figure 38 is from the Brent Cycle Strategy. The figure should remain consistent with extant Brent evidence to allow for cross-reference, but can clearly show the OPDC boundary.	Figure 38 amend: Colourwash the OPDC area and include on the key.
6.8 Transport	Figure 38	John Cox	The only map showing railway lines is, ironically, where they don't matter, in Figure 38: "Existing and Proposed Cycling Routes" on page 371. That map is poor quality, maybe a reused JPG file. Replace it with a sharpened, loss-free image.	Noted. See proposed changes.	Include high resolution version of figure 38.
6.8 Transport	BT1-BT4	TfL Commercial Development	Strongly support the principles advocated in Policy BT1 and prioritising sustainable / active travel over private motor vehicles. TfL CD supports the aim of achieving a modal shift with 80% of trips across London being made by public transport by 2041, as advocated in the Mayor's Transport Strategy, and welcomes Brent's alignment with draft London Plan policy regarding residential parking provision. Also support the criteria for determining the suitability of development with regard to the impact of proposed parking outlined in BT2.	Support welcomed.	No Change.
6.8 Transport	BT2	GLA	Support the parking ratio for B1(a) uses but the ratios for B1(c), B2 and B8 are too generous. B1 uses should follow Table 10.4 of the draft London Plan and B2 and B8 should be determined on their own merits.	Agreed that the table can be amended so London Plan standards apply to all B1.	8.4.1 Amend: "Parking standards for B1a uses <u>in outer London</u> as set out in the London Plan policy T6.2 <u>apply to all B1 uses in Brent. For office development south of the Dudding Hill Line Inner London standards will apply.</u> "

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.8 Transport	BT2	St. George	Object as: not sufficiently flexible, not consistent with national policy. Proposed modifications: “ Controlled Parking Zone (CPZ) is in place. ~~or can be achieved.~~ ” Reasoning: Ambiguous policy, which should be clear on the locations or criteria where CPZ can be achieved.	Noted. The absence of a Controlled Parking Zone should not preclude car free development in suitable areas. Policies surrounding car free development are fairly new, and are pivotal instruments for the Mayor in meeting his targets. The adoption of CPZ's is therefore yet to be comprehensive and currently is implemented only with the support of neighbourhoods that is will cover. In some cases, this is likely to require parking stress to be achieved which means that residents are more likely to eventually support a zone. The Council will focus on whether the tools are available to support a CPZ being achieved, e.g. sufficient funds in place to administer its delivery, than necessarily focussing on when it can be achieved. As such the policy is considered appropriate as it is encouraging, rather than requiring car free development.	No Change.
6.8 Transport	BT2	Wembley Towers Limited	Car free development is only encouraged where an existing Controlled Parking Zone (CPZ) is in place or can be achieved. This is unnecessarily inflexible. The opportunity to deliver a CPZ is with the Council and not the developer. The opportunity to promote car free or limited ('car-lite') parking development in a PTAL 4 area without an existing CPZ should reasonably be supported subject to local conditions and the relevant consideration of a Travel Plan and Transport Assessment. To ensure soundness and compliance with national policy to optimise the density of development in city and town centres and other locations that are well served by public transport, after BT2's first paragraph inset: “In appropriate locations benefiting from high levels of public transport access generally with PTAL 4 or above in areas outside an existing Controlled Parking Zone (CPZ), opportunities for car free development should be encouraged in the context of local conditions and subject to relevant justification through the submission of a Travel Plan and Transport Assessment”.	Noted. The impact of car free developments needs to be considered on the surrounding road and parking infrastructure. Without a CPZ in place, car free development has the potential to place additional pressure on these infrastructures in nearby locations. This could be a significant concern where parking stress exists. Car free development needs to be truly car free, and not just parking free. To ensure this is possible, realistically an appropriate CPZ needs to be in place, or achievable to discourage car ownership/ use. It is likely that a CPZ will be achievable in most locations and the Council will support developments where a developer makes reasonable endeavours to ensure its delivery, e.g. through a contribution towards a CPZ.	No Change.
6.8 Transport	BT2	Stonebridge Real Estate Development	Car free development is only encouraged where an existing Controlled Parking Zone (CPZ) is in place or can be achieved. This is unnecessarily inflexible. The opportunity to deliver a CPZ is with the Council and not the developer. The opportunity to promote car free or limited ('car-lite') parking development in a PTAL 4 area without an existing CPZ should reasonably be supported subject to local conditions and the relevant consideration of a Travel Plan and Transport Assessment.To ensure soundness and compliance with national policy to optimise the density of development in city and town centres and other locations that are well served by public transport, after BT2's first paragraph inset: “In appropriate locations benefiting from high levels of public transport access generally with PTAL 4 or above in areas outside an existing Controlled Parking Zone (CPZ), opportunities for car free development should be encouraged in the context of local conditions and subject to relevant justification through the submission of a Travel Plan and Transport Assessment”.	Noted. The impact of car free developments needs to be considered on the surrounding road and parking infrastructure. Without a CPZ in place, car free development has the potential to place additional pressure on these infrastructures in nearby locations. This could be a significant concern where parking stress exists. Car free development needs to be truly car free, and not just parking free. To ensure this is possible, realistically an appropriate CPZ needs to be in place, or achievable to discourage car ownership/ use. It is likely that a CPZ will be achievable in most locations and the Council will support developments where a developer makes reasonable endeavours to ensure its delivery, e.g. through a contribution towards a CPZ.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.8 Transport	BT2- Appendix 4	TFL Spatial Planning	Welcome that B1a (office) is in line with the London Plan. However, the employee to floorspace ratio for B1b (research and development) and B1c (light industrial) are over 4X higher than B1a (office), meaning industrial uses in B1c, B2 and B8 use classes would be permitted a higher parking ratio per sqm of floorspace despite having lower numbers of employees per sqm. The parking policy should refer to the standards in Table 10.4 of the draft London Plan for all B1 uses.	Agreed that the table can be amended so London Plan standards apply to all B1.	8.4.1 Amend: "Parking standards for B1a uses in <u>outer London</u> as set out in the London Plan policy T6.2 apply to <u>all B1 uses in Brent</u> . For <u>office development south of the Dudding Hill Line Inner London</u> standards will apply"
6.8 Transport	BT2- Appendix 4	TFL Spatial Planning	Supportive of broad approach to parking and car free development where in line with London Plan parking policies. Some concerns about the other employment uses approach, which allows higher parking provision. As with the draft London Plan every opportunity to reduce the proportion of these trips made by car – both through a development's location and design and through parking restraint – should be taken.	Noted. Brent's employment areas have variable access to public transport. To reflect this, the parking standards for employment uses are lesser in areas of high PTAL. To retain general viability and function, it is seen as appropriate to allow for a certain amount of parking. Paragraph 8.4.2 notes that the Council will support developments proposing standards below what has been outlined in table 1. This is in line with London Plan policy T6, H as it states a maximum standard as opposed to a minimum requirement.	No change
6.8 Transport	BT3	OPDC	Support should be given to freight consolidation	This is fair to reduce unnecessary vehicle movements and as such the text shall be amended.	Policy BT3 amend: "Development that would generate significant movement of goods or materials, both during construction and in operation, should minimise the movement of goods and materials by road. <u>Freight consolidation through maximising the use of the capacity of vehicles entering and exiting a site and the use of more sustainable alternatives, i.e. by rail and canal, is encouraged.</u> "

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.8 Transport	BT3	Aggregate Industries UK Ltd	Aggregates Industrials UK depot at Wembley is long established and meets a vital need for the sustainable import of aggregate, asphalt, and ready mixed concrete into London and should therefore be safeguarded. The NPPF states that existing, planned and potential sites for the bulk transport, handling and processing of minerals, concrete and aggregates should be safeguarded. In addition, NPPF states that planning policies should ensure new development can be integrated with existing facilities, and that they should not have unreasonable restrictions placed on them as a result of development permitted after they were established. DNLP policy Si10 states that development plans should ensure sufficient capacity of aggregate rail depots is available and where practicable expand capacity adjacent to rail depots adjacent to major construction projects. 3.New policy BT3a to specifically safeguard bulk transport, handling and processing facilities as required by the NPPF and London Plan, as follows: Existing bulk mineral transport, handling and processing facilities and facilities for the manufacture of concrete and concrete products will be safeguarded and development proposals which would conflict with the effective operation of these facilities will not be permitted unless: •The development proposals can provide appropriate mitigation to ensure that they will not place unreasonable restrictions on the effective operation of these facilities; or •The existing facility can be satisfactorily relocated within the development proposals in terms of operational requirements and environmental criteria; or •The facility is replaced in an appropriate alternative location.	It is accepted that the Plan could provide more of a positive framework to ensure the retention of existing rail freight sites. As such it is proposed that policy BT3 is amended to incorporate appropriate reference to existing facilities.	Policy BT3 amend: "Existing sidings and sites adjacent to them or the canal with the potential for rail freight use will be protected ~~where these are adaptable to serve anticipated needs.~~ <u>Development proposals which would conflict with the effective operation of these facilities will not be permitted unless:</u> <u>a) appropriate mitigation is provided to ensure it will not place unreasonable restrictions on the effective operation of these facilities; or</u> <u>The existing facility can be satisfactorily relocated within the development proposals in terms of operational requirements and environmental criteria; or</u> <u>The facility is replaced in an appropriate alternative location."</u>
6.8 Transport	Blank Transport	John Cox	The inner-most OSTC in Brent is the North London Line. Moving out the next OSTC is the Dudding Hill Line or potential West London Orbital (WLO). It also connects end-on with what might be called 'OSTCs' in Hounslow and Ealing, and a few metres on the eastern side of the A5 Edgware Road in Barnet. There should be a third OSTC. It is A4006 Kenton Road, along the border with Harrow, continuing as the A4006 Kingsbury Road eastwards to the A5 Edgware Road. This could link Harrow and Colindale town centres and destinations between (including all public transport links). This would be consistent with achieving sustainable development and modal shift away from the private car. No other obvious route for an OSTC across outer north-west London exists. Potential passenger densities are probably high enough for fixed-infrastructure intervention. There should be a detailed study involving adjoining boroughs, similar to the process for the WLO and that for the 'Sutton Link' in south-west London. Its inclusion in the Brent Local Plan in short narrative form would be sound. Fixed infrastructure could be on-road and segregated tram tracks. It is potentially wide enough for segregated cycle lanes along its whole length. Whilst delivery of the project may be some time off,	Noted. The potential of OTC 3 route is understood, notwithstanding that currently it has not been formally considered/ has no status as a transportation project. Significant elements of this route are identified as intensification corridors and much of the highway along the route is generous in width. At this stage, it is considered that the existing highway boundary is sufficiently wide to be able to accommodate future use for non-private vehicles. The Council working with the West London Alliance is considering future strategic infrastructure needs and the Council can raise consideration of this project as part of that process.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
			identification in the Local Plan will raise its profile and ensure the potential corridor is not compromised by short term planning.		
6.8 Transport	Blank Transport	Highways England	Highways England are mindful of the planning decisions effects on Strategic Road Network operations and associated junctions. The Agency and SRN cannot be expected to cater for unconstrained traffic growth generated by new developments. Policies and proposals incorporating measures to reduce traffic generation at source and encourage more sustainable travel behaviour are supported. Highways England are pleased to see reference to them within the Local Plan and clarity that they will be consulted on any development that may have an impact on the M1. A Strategic Transport Assessment in accordance with Circular 02/2013 should provide an indication of the residual impacts of the high level of development proposed over the Plan period on the SRN prior to submission. It should cover an appropriate area; possibly beyond the borough boundary. It should also set out various intermediate dates to identify any tipping points when action will be required, plus what measures may be required to mitigate these impacts. Until this has been submitted, Highways England are not in a position to offer any detailed comments.	Noted. As acknowledged by Highways England, the Local Plan seeks to increase the modal share of more sustainable transport modes, encouraging development in areas with good public transport, whilst also reducing car dependency. This is also supported by policies within the new London Plan. Sustainable modes will be supported through policy BT1, whilst BT2 sets stringent parking standards, and seeks to prioritise the delivery of car free development in appropriate areas. The Plan identifies significant areas of the borough for redevelopment. These areas will come forward with significantly less parking than is currently present. This is particularly true for example in Staples Corner which is identified as an area for intensification/co-location. Intensification of floorspace is likely to reduce the use of private vehicles at peak times in the area significantly as space allocated to private parking will reduce to meet floorspace needs. In terms of the need for a Strategic Transport Assessment the Council has sought further dialogue with Highways England, on its necessity and scope, for example its inclusion of development in Barnet, which has significantly more development planned in areas with poorer public transport accessibility than Brent and therefore likely to be more vehicle dependent. It is awaiting Highways England's response. Large sites which will significantly inflate local populations are generally likely to be subject to a masterplan approach. This will allow the Council to reduce the impact on the road network as much as possible through a holistic approach to those areas. The Mayor's Strategic Transport Modelling Report models the impact of projected population increase on the road network. It concluded that overall private vehicle use would reduce from 9.72 million trips per day in 2015 to 6.6 million trips per day in 2041, which gives the potential for significant reductions in impacts on the strategic road network and as such should free up capacity so that additional capacity investment is not required.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.8 Transport	Blank Transport	John Cox	(3) Willesden Junction station: This is now within the planning boundary of the OPDC. However, there should be passive provision within other parts of Brent for certain related matters. Network Rail (NR) is considering a major redevelopment at Willesden Junction (with at least four 30-storey commercial or housing blocks, for instance). This would allow wholesale rebuilding of the station. Harlesden Neighbourhood Forum, and I have met them at a senior level and expect receipt of further analysis of Willesden Junction concurrently when it is presented to the OPDC board. NR has agreed to consider providing passive provision for four Low-Level through-platforms at Willesden Junction, four High-Level through-platforms with a ticket office directly on the A404 Harlesden High Street, and additional West Coast Main Line and Milton Keynes-Croydon train platforms. Extra platforms provide positively-prepared soundness, if there develops a booming OPDC development area over the next two or three decades. One possibility for greater capacity and connectivity in such a golden future is to extend some or all Barking-Gospel trains to terminate at Willesden Junction High-Level. Another possibility is to extend some East London Line trains from Highbury & Islington though to Willesden Junction Low Level via Primrose Hill and Queens Park. The third possibility, crucially requiring a Local Plan change, is to passively provide for a new chord at Northwick Park, to allow Chiltern Aylesbury Branch trains via Harrow-on-the-Hill to run through Wembley Central and terminate at Willesden Junction Low Level. This needs mention the “5.4: NORTH WEST” Place narrative if you wish that section to be sound and positively prepared, providing Buckinghamshire passengers with a direct route to Old Oak Common and also an imperfect interchange with Crossrail, including to Heathrow airport. This would drop down from the east of Northwick Park station (there are currently no platforms on the Chiltern tracks) and join the Watford Junction-London Euston DC Line, possibly at a grade-separated junction. This area is currently metropolitan open land, but a small triangle of it would be needed. The link would also improve interchange between these two rail lines for Brent and Harrow residents generally.	Noted. The area identified for the connection is within Northwick Park subject to metropolitan open land designation. As such it would be protected from development. As this potential transport link is speculative and is unlikely to be delivered in the timeframe of the Local Plan it is not considered appropriate to identify the potential route/ safeguarding at this stage, which in any case is unlikely to be compromised due to the MOL designation.	No Change.
6.8 Transport	Blank Transport	John Cox	Some years, Sudbury & Harrow Road is Greater London’s least used railway station with four morning and evening peak trains into and out of London Marylebone. The station environment is poor. Local Plan narrative should mention the proposed diversion of many Chiltern commuter trains at South Ruislip, via rebuilt Greenford and North Acton stations. Trains would run to a two-track terminus at Old Oak Common station, squeezed between the HS2 and the Crossrail/Great Western Main Line platforms. That would reduce pressure on the Chiltern Main Line and more trains could stop.	Although changes to the Chiltern Line services are interesting, this is unlikely to significantly affect the area as it already has high PTAL and therefore in the context of future development potential will not amend the approach to this Place.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.8 Transport	Blank Transport	John Cox	Reference to "Cross Rail" in 6.8.6 should be changed to "Crossrail, Great Western Main Line". Brent wishes to see two new stations on the Dudding Hill Line (Harlesden and Neasden). Par 3.33 only mentions Neasden, but Figure 6 shows both. Both stations should be given equality of esteem. Previously, Brent has asserted that the Dudding Hill Line stations should have passive provision for 8-car passenger trains. Brent must add the 8-car wording in part of the narrative. Strategic planning policy remains with the boroughs' Local Plans and Brent should not try and kick the aspirations for the Dudding Hill Line stations to the WLEPB. Capability for longer-distance, inter-regional trains at a later stage is a sound and positively prepared aspiration for the Borough. With known railway lines planned or being built, the Dudding Hill Line might one day support for example a Guildford - Harlesden - Neasden - Cambridge service which would benefit the connectivity of Brent's Growth Areas, helping the modal shift from cars. For transparency it should be explained what the council has stated at formative stages about the possible nature and number of Brent's Dudding Hill Lane stations and their platforms. LB Barnet has completed a study on the integration of 8-car platforms at the proposed Brent Cross West Thameslink station and it seems inevitable that 8-car platforms will be expected at the proposed Old Oak Common Lane station. The Brent Local Plan does not mention passive provision at Brent's Dudding Hill Line stations for 8-car platforms, therefore the Plan is not sound because it would be more positively prepared if it did.	The reference to Crossrail will be amended to refer to Elizabeth Line. Neasden station will also be added. Mention of the need for passive provision of 8 car is also considered appropriate.	Paragraph 6.8.6 amend: ".....Old Oak Common (~~Cross rail~~ <u>Elizabeth Line, Great Western Mainline</u> and High Speed 2 stations)....."Paragraph 3.33 amend: "...with ~~an~~ additionalstations at <u>Harlesden and Neasden</u> (2026)."Policy BEGA1 infrastructure requirements amend: ".....space for proposed public transport improvements including the West London Orbital line and station <u>with potential for platforms for up to 8 car-trains</u>"

7 DELIVERY AND MONITORING

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
7 Delivery and Monitoring	Figure 35	Innovative Infill	BH4 does not have measurable targets indicating a lack of desire to drive delivery of housing on small sites.	Agreed. As there is a small sites target in the new London Plan, delivery against this should be monitored.	Figure 39 amend by adding: "Performance Measure <u>Number of homes built on small sites</u> . Target <u>433 dwellings</u> . Specific policy to be monitored <u>BH4</u> "
7 Delivery and Monitoring	Para 7-1-5	CCG	NPPF paragraph 34 requires Plans to set out the level of developer contributions for affordable housing AND other infrastructure. Paragraph 20 also requires strategic policies ensure the sufficient provision of health infrastructure. Whilst the IDP lists what is required, the plan should be amended to provide a clear link and the role of developer contributions, ensuring they are sustainable for the NHS. We are concerned health infrastructure is not consistently referenced throughout the Plan, as has transport and green infrastructure. It should be included within the infrastructure requirements section of site allocations that they should contribute to health infrastructure to mitigate the impact of growth. This approach should be consistent throughout the paragraphs, policies and site allocations, for example, BP6 does not currently reference health facilities.	The need to address health infrastructure requirements is understood. Providing sufficient health infrastructure is reliant to a large extent in identifying needs arising from development and identifying solutions to meet that need. In absence of this any policy is likely to be generic. It is recognised that greater emphasis could be placed in the Place policies on consistency on health infrastructure and this will be a proposed modification.	Policy BP2 East Amend: "k) ~~Securing sufficient physical and social infrastructure on and off site to support the Meeting social infrastructure requirements by securing provision for needs arising from new housing development, especially the provision of new education, health, cultural and community facilities, notably at Staples Corner and Neasden Stations' Growth Areas, in particular and ensuring the improvement of the Welsh Harp and its setting.~~ Policy BP3 North amend: "m) <u>Meeting social infrastructure requirements by securing provision for needs arising from new housing development, especially the provision of new education, health, cultural and community facilities, notably at Secure sufficient physical and social infrastructure on and off site to support an increase in population at Burnt Oak and Colindale</u> " Policy BP4 amend: " <u>Meeting social infrastructure requirements by securing provision for needs arising from new housing development, especially the provision of new education, health, cultural and community facilities, notably at As part of the development within the Northwick Park Growth Area where the following improvements to community and cultural facilities should be achieved:</u> " Policy BP5 under Community and Cultural Facilities amend before m) by adding another bullet: " <u>Meeting social infrastructure requirements by securing provision for needs arising from new housing development, especially the provision of new education, health, cultural and community facilities</u> " Policy BP5 amend: "k) <u>Meeting social</u>

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
					<u>infrastructure requirements by securing provision for needs arising from new housing development, especially the provision of new education, health, cultural and community facilities notably Securing infrastructure in South Kilburn to include a new community space, 3 form of entry primary school and nursery and other community uses.</u>
7 Delivery and Monitoring	Para 7-1-5	CCG	Clause b) on page 21 recognises the challenge for health, however, this is not reflected in the Monitoring and Delivery (para. 7.1.5) does not reflect the borough capacity issues. This should be amended as follows: '...The council also works closely with Brent CCG on their estate strategy and in seeking sufficient capacity for General Practitioner surgeries where required on new development sites. Recent examples include the Wembley Park development, the Peel development in South Kilburn and the Waterside development in Alperton. Subject to early identification of the need for premises from the CCG, and agreement on acceptable premises rents it is not envisaged that there will be significant difficulties in addressing longer term needs arising from developments related to additional premises. It is envisaged that increased capacity for existing primary and community care will be required at some existing facilities to increase out of hospital care and meet the needs of a growing and changing population. The impacts of development on health infrastructure should be mitigated through the use of S106 agreements, where appropriate and offered at an affordable rent, and through CIL contributions.'	On paragraph 7.1.5 the suggested amended text is considered appropriate. The CCG has made it clear to the Council that on-going rent for new facilities at the levels currently negotiated create budgetary issues due to lack of current available funding.	Policy BP2 East Amend: "k) ~~Securing sufficient physical and social infrastructure on and off site to support the~~ <u>Meeting social infrastructure requirements by securing provision for needs arising from new housing development, especially the provision of new education, health, cultural and community facilities, notably at Staples Corner and Neasden Stations' Growth Areas, in particular and ensuring the improvement of the Welsh Harp and its setting.</u> Policy BP3 North amend: "m) <u>Meeting social infrastructure requirements by securing provision for needs arising from new housing development, especially the provision of new education, health, cultural and community facilities, notably at Secure sufficient physical and social infrastructure on and off site to support an increase in population at Burnt Oak and Colindale</u> " Policy BP4 amend: " <u>Meeting social infrastructure requirements by securing provision for needs arising from new housing development, especially the provision of new education, health, cultural and community facilities, notably at As part of the development within the Northwick Park Growth Area where the following improvements to community and cultural facilities should be achieved:</u> " Policy BP5 under Community and Cultural Facilities amend before m) by adding another bullet: " <u>Meeting social infrastructure requirements by securing provision for needs arising from new housing development, especially the provision of new education, health, cultural and community facilities</u> " Policy

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
					BP6 amend: "I) <u>Meeting social infrastructure requirements by securing provision for needs arising from new housing development, especially the provision of new education, health, cultural and community facilities notably Securing infrastructure in South Kilburn to include a new community space, 3 form of entry primary school and nursery and other community uses.</u>
7 Delivery and Monitoring	Paras 7-1-6 - 7-1-18	John Cox	All wording in the section needs review to incorporate 'plain English' to try and make it easier to read fluently. 7.1.6 Change "subsidisation" to "subsidy" 7.1.6 Explain "I4B" 7.1.8 Should be "on-going funding" 7.1.18 Change to "is the Brent River Park" 7.1.18 Remove either "trying" or "seeking".	Paragraph 7.1.6-7.1.18 All changes agreed.	Paragraph 7.1.6 amend: "...thorough cross ~~subsidisation~~ <u>subsidy</u> on development Paragraph 7.1.6 amend: "...arm's length delivery vehicle (<u>company name: i4B</u>) in assisting .." Paragraph 7.1.8 amend to "...on-going funding..." Paragraph 7.1.18 amend to: "...open space ~~are~~ <u>is</u> the Brent River Park" Paragraph 7.1.18 amend to: "...different ways of ~~trying~~ seeking to support...."
7 Delivery and Monitoring Page 765	Para 7-1-15	OPDC	Health provision is a cross boundary issue and the need for ongoing joint working between OPDC and Brent should be recognised in the text.	Agreed. There are a number of social infrastructure items that serve cross boundary communities. The need to work across these boundaries should be identified in the Plan.	Paragraph 7.1.15 amend at end: " <u>There is the potential for expansion of healthcare provision in the Brent area to support growth in adjacent communities and vice versa. The Council and the Brent CCG will work with adjoining boroughs (and OPDC) and relevant CCGs to ensure suitable and timely provision of necessary facilities.</u>
7 Delivery and Monitoring	Para 7-1-19	John Cox	Paragraph 7.1.9 Not delivering the West London Orbital would "fundamentally undermine" all Growth Areas across north-west London, so why not say so? The Growth Areas design would need to ensure protected public land for future rail infrastructure/ stations to not undermine delivery. Staples Corner Growth Area might actually be the least affected, because its promised station is still likely to happen, and in the short-term as well. This will at least provide good radial links to central London. LB Barnet is unwilling to say if platforms for Brent's Dudding Hill Line trains will be passively provided unconditionally at Brent Cross West station.	The WLO position as set out in the paragraph is considered fair. At Neasden and Harlesden the WLO will assist delivery of growth but is unlikely to be fatal to the prospects of those areas. It is agreed that for Staples Corner, Thameslink will improve matters, nevertheless, its PTAL will still remain comparatively low and thus potentially not as attractive to investors.	No Change.
7 Delivery and Monitoring	Figure 39	John Cox	Performance Measure: "No loss of viable public houses" To: "No loss of public houses" as this emphasises the default position of the council.	Public house measure: The measure of no loss of a viable pub is considered fairer, as this takes account of whether it is realistic for the pub to remain.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
7 Delivery and Monitoring	Figure 39	John Cox	Include a Performance Measure on: “Poverty and Deprivation” through long-term monitoring of specific sections of existing communities suffering poverty and deprivation. Currently there is not enough data on changes since your last Local Plan and it might affect this Plan.	Poverty and Deprivation Measure: Accepted. Add proportion of Brent Local Super Output Areas in the bottom 20% of most deprived areas nationally as identified in the Indices of Multiple Deprivation. Add proportion of the top 20% least deprived areas nationally as identified in the Indices of Multiple Deprivation.	Figure 39 amend by adding new first and second measures: Performance Measure " <u>Proportion of Brent Local Super Output Areas in the bottom 20% of most deprived areas nationally as identified in the Indices of Multiple Deprivation.</u> " Target " <u>15% 2031</u> " Specific Policy to be monitored " <u>Development Vision</u> " Performance Measure " <u>Proportion of the top 20% least deprived areas nationally as identified in the Indices of Multiple Deprivation.</u> " Target " <u>2% 2031</u> " Specific Policy to be monitored " <u>Development Vision</u> "
7 Delivery and Monitoring	Blank Delivery and Monitoring	John Cox	Change name to “Delivery Risks and Monitoring” which is more accurate of content.	Delivery and Monitoring is considered an appropriate title as it incorporates more than risks.	No Change.
7 Delivery and Monitoring	Blank Delivery and Monitoring	Andrea Diez	Delivery social infrastructure and housing around Willesden Green, Stonebridge Park station, Kensal Green, Neasden, Kilburn, and Queens Park.	Agreed, some of these are specifically identified as growth areas which have identified infrastructure needs (such as South Kilburn), whilst others will not be subject to such high levels of housing growth.	No Change.
7 Delivery and Monitoring	Blank Delivery and Monitoring	Mary Duffy	Plan should be assessed by central government, with efforts made to curtail investor influence.	The Plan will be submitted for examination to an independent planning inspector.	No Change.

8 APPENDICES

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
8 Appendices	Appendix 4	TFL Spatial Planning	Proposed standard of 1 space per 200 sq. m. applied to areas north of the Dudding Hill rail line appears a rather crude boundary. It includes Wembley Opportunity Area where good public transport connectivity and co-ordinated transport investment would justify a more restrictive approach. The potential West London Orbital rail route would increase connectivity. The differential parking standard could lead to an anomaly. Areas immediately to the north of reopened stations would have a very different parking standard to those south, regardless of PTAL or proximity to stations.	The Dudding Hill railway line is not considered to be a crude boundary. It marks a very clear dividing line between the southern “Inner London” part of the Borough, where PTAL values are generally high and CPZ’s are extensive, and the northern “Outer London” area of the Borough where PTAL values are generally lower and CPZ’s less comprehensive. The exception is the Wembley Opportunity Area, which the London Plan has more restrictive standards for offices in Outer London Opportunity Areas, so Wembley would be covered by these. It is acknowledged that the potential opening of the West London Orbital Railway to passenger services could create an anomaly whereby very different standards are applied to sites on either side of stations along the line. However, there is currently no certainty that the West London Orbital line will reopen to passenger traffic and even if it does receive the necessary funding, it is likely to be a number of years before it does open. It is likely that the Plan will be subject to review in this time when the standards can be reviewed. If the West London Orbital line does come into operation so that PTAL values along the route rise, extensions to CPZ’s would also be likely, so a redrawing of the boundary between “Inner” and “Outer” Brent standards, perhaps along the line of the North Circular Road, may be appropriate at that time. Given TfL’s comments, it would be useful to clarify that in applying London Plan B1a office standards, Inner London standards apply to areas of Brent south of the Dudding Hill Railway line (i.e. offices in those locations shall be ‘car-free’).	8.4.1 Amend: "Parking standards for B1a uses <u>in outer London</u> as set out in the London Plan policy T6.2 apply <u>to all B1 uses</u> in Brent. <u>For office development south of the Dudding Hill Line Inner London standards will apply.</u> "
8 Appendices	Blank Appendix	John Cox	(4) The Appendices: Every Appendix should have a narrative paragraph that describes what it is achieving (some do). That description should also refer to what sections in the Local Plan they are appendices of. (Appendix 2 already does in its title.) The alternate light-green, dark-green, light-green colour banding in all appendices ought to start with a dark-green, not a light one (as is does in Figure 39). That banding is confusing in Appendix 1 and Appendix 3. To solve that, add a narrow white strip after lines 3, 6 and 9 in the former and after line 3 of the latter. Then start the banding scheme afresh (which means with dark-green) for the lines that follow the white strips. All words on the first line of each appendix table (plus, where appropriate from the above comments, for lines 4, 7 and 10) should be changed to bold text (as it is in Figure 39).	4. Noted.	4. Improve structure/ consistency of structure within appendices, include a clear title and explanatory opening paragraph for each section. Improve structure of tables by ensuring consistent formatting, including bold headings, and break up tables in appendix 1 & 3 using breaker lines to improve clarity.

GLOSSARY

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
Glossary	Blank Glossary	GLA	Locally Significant Industrial Sites (LSIS) - is primarily suitable for industrial uses. Non-industrial uses should only be introduced as part of a plan-led or masterplan approach in accordance with London Plan Policy E7 and the Mayor's Practice note on industrial intensification through plan-led and masterplan approaches. See London Plan Policy E1.	Noted. The definition in the glossary can be amended to refer to industrial rather than employment.	Glossary Locally Significant Industrial Sites amend: " ~~Employment~~ Industrial sites identified in the ~~Core Strategy~~ <u>Local Plan</u> as being of significance to Brent's economy."
Glossary	Blank Glossary	John Cox	(8) Add a definition of "Intensification Corridor" to the Glossary. Mention necessary conditions like PTAL levels.	8. Agreed - add definition of intensification corridor to Glossary.	8 Glossary amend: " <u>Intensification Corridor</u> : Principal movement corridors such as main roads, with good access to public transport where it is considered that higher density development/ buildings around 5 storeys are likely to be <u>appropriate</u> ."

OVERALL

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
Overall	Blank Overall	John Cox	Every map in the Local Plan should show the borough's railways. It will not make the maps too crowded by including a thin black line for every railway corridor and small black blobs for stations. It also emphasises the close strategic link between land use and fixed transport infrastructure. For future strategic planning, showing both the interconnection of Brent's districts by railways and their severance are both important.	Noted. See proposed changes.	Include railway lines/ stations on all appropriate maps within the Plan.
Overall	Blank Overall	Scott Bartle	Note majority responses made to the last consultation were from other public authorities (i.e. the environmental agency etc.). Suggest you give general public response more thought. Instead of just 'noting' things, adapt and make changes based upon what the public have said. There was also no online comments page section on the website - again making it more difficult for public responses.	The Council responded to all comments received during public consultation, giving each equal weight. Full responses were given to the majority of comments from residents, those which were noted were general comments supporting elements of the Plan. The majority of detailed responses did come from organisations rather than residents and such bodies usually identify specific elements where the Plan needs to be amended.	No Change.
Overall	Blank Overall	Environment Agency	A robust flood risk evidence base, including a sequential test document, have not been provided to justify allocation of certain sites. The lack of sequential test was raised previously, which Brent said it would address. This must be applied whilst the Plan is in preparation and not prior to publication or submission as stated in the NPPF. It is yet to be effectively demonstrated that this has been carried out, either through the Local Plan or the level 2 SFRA.	The Council has undertaken a Strategic Flood Risk Assessment Level 1 and Level 2 for individual sites as well as considering flooding as an item in the Sustainability Appraisal of each Proposed Site Allocation. The SFRA Level 2 identified that as Brent's housing target as set out in the London Plan could not be delivered in Flood Zones 1 and 2 and as such sites within Zones 3 was subject to the exceptions test. The Plan has been clear about which allocations are within flood zone 3 and has identified where further work will be required from the applicant in terms of a detailed site flood risk assessment and a sequential approach to the location of development on site to reduce flood risk. A summary table setting out each site's consideration against the sequential test is being produced to provide further clarity on this matter.	No Change.
Overall	Blank Overall	Northwick Park Partnership	Support policies and aims, especially promotion of sustainable development. Plan identifies 8 Growth Areas where development should be prioritised for efficient and intense development to ensure land optimisation. Northwick park will make a significant contribution towards Brent's housing target and therefore welcomes its allocation as a Growth Area. We look forward to working with the council toward such aims.	Support welcomed.	No Change.
Overall	Blank Overall	John Cox	Reg19: Suggested formatting and general corrections(1) The PDF file, the "Local Plan (whole document)" should be reformatted as single A4 landscape pages, not mostly double-page spreads. Although there are 400 real pages, there are only 218 PDF pages. It is impossible to go to a particular real page number (because you do not know where to go) or to print a single page.The PDF's 'Contents' list (called 'Bookmarks' by Adobe Reader) misses labelling some of the sections and has items with 'Part' numbers in their names that do not correspond to the document section numbers. Also, all of the Contents item names start with the long word string: "8365 Local Plan A4 landscape – Part" which in practice means they all look	1. Agree to consider ways in which the document when finalised can be made easier to read on a hand held device, such as single page.	1. Address ability to navigate document effectively – may require conversion from double page spread. Ensure contents works effectively and corresponds to correct pages.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
			identical on screen. Some of the Contents item names also have unnecessary version numbers.		
Overall	Blank Overall	John Cox	(2) The menu page for the “Individual sections for smaller download” ought to have the section numbers included in the titles of the various images. For instance, the wording on the menu page for: “Central Place” should change to: “5.1 Central Place” but that one specific example should change further, to “5.1 Central Place (and Places map)”. Annoyingly, there is no direct ‘one level back’ from the menu page to the “Shaping Brent’s Future Together” page, because for some reason you have dropped two structure headings within the purple banner at the top. Presumably the headings list will wrap around successfully in any browser if it is more than one line long, so don’t drop them. All those 21 section PDF files should be reformatted as single A4 landscape pages, not mostly double-page spreads. They should also have their PDF page numbers coinciding with their real page numbers (which the PDF file format easily allows). For instance, the “5.3 North Place” should not have PDF page numbers of ‘1 to 15’, but ‘103 to 130’ instead.	2. The existing Shaping Brent's Future Together webpage is for the draft document. Once the document is adopted, the page will be reconfigured, with greater emphasis placed on coherence and navigation. These comments will be taken into consideration at that stage.	2. Update the website on adoption to make it easier to access parts of the Local Plan
Overall	Blank Overall	John Cox	(6) All subheadings throughout the Local Plan must be in blue text. Some are not (for instance, two on page 336).	6. Noted. The sub headings on page 366 are the correct format.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
Overall	Blank Overall	John Cox	(7) Much of the Local Plan consists of a blue tinted box containing a numbered “POLICY”, followed by a series of subheadings beginning with “JUSTIFICATION”. The golden rule should be that: No subheading or text of any Policy should proceed the Policy on the page. Compliant examples of that rule are single-column Policy boxes on page 303, and the double-column Policy box on page 336. An example of a failure for a single-column Policy box is on page 305. That must be corrected by swapping over the Policy BH12 box and the subheading “APPLICATION INFORMATION” below it, which belongs to the previous Policy BH11. (Actually, since “LONDON PLAN” subheadings are mean to be last in a subsection, paragraph 6.2.93 ought to be moved before the “LONDON PLAN” one in the first column.) Failed examples for double-column Policy boxes are on pages 315 and 340. They should be rearranged as in your example on page 356 (or you may decide that is being too pedantic). The clarity of that example of page 356 is helped by only having bold text across the two columns above the Policy box, and normal text below it. That would not be the case correcting the layout error on page 324. After moving the text around, a two-column horizontal rule above the Policy box would ensure the eye moved horizontally to reach the end of paragraph 6.4.45, rather than continuing down the centre column. Finally, just when you think some of this is being too pedantic, where exactly does the associated text for Policy BSWGA1 on page 244 start? I assume it starts at paragraph 5.7.30, but it needs a blue “JUSTIFICATION” subheading. (To correct everything, move the Policy box to the start of page 245. Move all the text until the end of paragraph 5.7.29 backwards a page. Start 5.7.30 below its new subheading at the bottom of the first column on page 245, and flow the rest of the text, including over to page 246, where the moved primroses photograph can fill the first column.) And where does the associated text for policy BNGA1 on page 116 start? Oh, two pages earlier, it seems. (To at least partly correct this, crop the bottom of the photograph on pages 112 and 113, to move paragraph 5.3.39 on to the previous page. That deliberately results in a little white space at the bottom of the middle column of page 114. Then start the third column with a new horizontal rule. At least that will warn the reader something odd is going on. Then all is revealed on page 116.)	7. Noted. Agree to amend where necessary.	7. Ensure supporting text/ images to policies do not precede the policy itself throughout the document, and that the structure follows: policy, supporting text, associated LP policies, evidence base, forthcoming documents. 8 Glossary amend: " Intensification Corridor: Principal movement corridors such as main roads, with good access to public transport where it is considered that higher density development/ buildings around 5 storeys are likely to be appropriate."

POLICIES MAP

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
Policies Map	Blank Policies Map	Dominvs Group	Policies map is not clear as boundaries overlap, and polygons used are too similar. It is not clear whether the ‘egg’ shaped blue dashed line centred around Wembley is intended to depict a Tall Building Zone – if so, this appears incorrect and should reflect the Tall Building Zones shown for this area within the Brent Tall Buildings Strategy (October 2019), which are supported.	Noted. It is acknowledged that the policies map is very busy when all layers were added. The map was split into 3 separate maps containing layers that did not conflict wherever possible. The website contained the following text: "We recognise the policies map shows a lot of information. A number of designations may share common boundaries. As policy layers have been placed on top of each other this might reduce the clarity of some boundaries. To assist we have provided the below maps. Each has a reduced number of designations. The layers have been distributed across three maps as was appropriate to improve clarity. If you require clarification on any boundaries please do not hesitate to contact us." The Tall Buildings Zone on the Policies Map was consistent with the Tall Buildings Strategy.	No Change.

IIA

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
IIA	Blank IIA	Andrea Diez	More redevelopment should be in areas such as Willesden Green, Queens Park, Neasden, Kilburn, Kensal Green and Harlesden.	Policy BEGA1 (Neasden Stations Growth Area) supports the regeneration of Neasden, with the Growth Area being allocated for Strategic Industrial Location and Locally Significant Industrial Sites subject to co-location and intensification, new passenger railway line infrastructure and residential development. The other proposed Growth Areas are either already existing (Wembley, Alperton, Burnt Oak / Colindale, Church End and South Kilburn) or are newly proposed (Northwick Park, Staples Corner, and Neasden, as discussed above). The newly proposed Growth Areas have been allocated due to being employment and residential areas that are not reaching their full potential compared to other parts of the borough, pointing to new large scale regeneration opportunities. Although Willesden Green, Queens Park, Kilburn, Kensal Green and Harlesden have not been allocated as Growth Areas, the policies in the Local Plan will still ensure that proposals for development within these areas which will result in strong and inclusive communities, make the best use of land, create a healthy borough and deliver the homes to meet Brent's need, will be supported.	No Change.
	Blank IIA	Thersa	The IIA is too long and an abridged version should have been included.	A non-technical summary of the IIA is available on the Shape Brent webpage. Unfortunately, it is not possible to reduce the non-technical summary version further without compromising the content of the IIA.	No Change proposed. However, an updated version of the IIA non-technical summary to be published along with updated version of IIA.
	Blank IIA	Environment Agency	Previous comments in response to the Preferred Options Consultation have not been addressed in relation to the methodology for determining impacts on sites located in Flood Zone 2. The table in par 3.6 does not adequately assess/ categorise certain sites at risk of flooding, particularly <50% within FZ2 and <50% within 'moderate' groundwater flood risk area. The current methodology categorises such sites as having the same risk of flooding as sites located wholly in FZ1, which is incorrect. In line with national policy and the sequential test, a site wholly in FZ1 should be prioritised for allocation of a site partially in FZ2. Following this methodology the evidence for the Brent Local Plan is not justified.	The council disagrees that the evidence for the Local Plan is not justified. The suitability of sites in relation to flood risk has been considered throughout the Local Plan process, including the allocating of sites, and the SFRA Level 2 notes that Brent is not able to accommodate all of its housing target within Flood Zone 1 alone. Comments in relation to the methodology and the categorisation of sites within Flood Zone 1 / Flood Zone 2 and groundwater flood risk in order to support / evidence the carrying out of the sequential test are noted and a change to the IIA methodology in relation to flood risk is proposed.	Amend the methodology in the IIA so that: I) In relation to EN12a, sites within Flood Zone 1 are categorised as "Minor Positive" and sites which fall partly within Flood Zone 2 (but less than 50%) be ranked as "Neutral"; II) In relation to EN12b, sites with low groundwater flood risk are categorised as "Minor Positive" and sites with less than or equal to 50% within 'moderate' groundwater flood risk area to be ranked as "Neutral"

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
IIA	Blank IIA	Mary Duffy	The upper height for Staples Corner has been increased to 15 storeys. This is unacceptable and will destroy the area. Supports the findings of DEFRA and Historic England. - DEFRA Biodiversity Calculator should be included as a potential indicator for EN5. - Mapping exercise should be undertaken every 3-5 years for newly created habitats to track effort- River morphology surveys for River Brent catchment- No mention of flooding on communities and rivers- Policies should seek to achieve the equivalent of 'good' ecological status post Brexit- Characterisation Study will be of high value in understanding the impact of / helping shape developments- Some site allocations have not identified heritage considerations (BCSA1, BNWSA1, BSSA17, BSESA21)- Brent Reservoir SSI should be included as a criterion under EN5 - Health Impact Assessment should be separate- Concern over MOL land swap proposal- Too complicated- Green space should be increased- Infrastructure improvements should happen prior to / alongside with residential development- Changes made include: reference to DEFRA Biodiversity Calculator, mapping exercise for new habitats, reference to river morphology, surveys on River Brent catchment, amend the second EN% target to 'development schemes within the borough achieve a net gain for biodiversity'	The existing site is a gateway to Brent and wider London, and gives a poor initial impression, and overall the masterplan will aim to improve the area rather. The publication stage version of the Tall Building Strategy notes that an appropriate heights of buildings within the Staples Corner Growth Area could range from 6-20 storeys. A masterplan will be carried out for the Growth Area and will be required to take into account of the character of the surrounding areas. Given the size of the Growth Area, heights of the proposed buildings may vary across the site (the Tall Building Strategy notes that the area to the east is most suitable for the core of taller buildings, with the buildings in the area in the main being mid-rise 6 - 8 storey buildings). Policy BEGA2 notes that the proximity and two storey suburban character of adjacent areas to ensure that buildings are stepped down towards the edge of the Growth Area, and also refers to the need for appropriate assessments to be undertaken to ensure local heritage assets and their settings are preserved or enhanced, in addition to views from the Welsh Harp needing consideration in terms of design to improve its setting. Development of the area will aim to provide a higher quality public realm, pedestrian and cyclist environment and to open up views to / enhance views from Welsh Harp. Support for DEFRA's, Historic England, Natural England and residents' previous comments / findings is noted. The council's responses to the comments received at the previous stage of consultation from these can be found at https://www.brent.gov.uk/media/16414596/all-comments-summary-v3.pdf	No Change.
	Page 388	Historic England	3rd bullet point under Evidence Gaps should be changed to "APA review will take place in 2020", and recommend a direct link to the APA webpage.	Noted.	Update the Evidence Gaps to refer to the 2020 APA review, with a link to the APA webpage.

TALL BUILDING STRATEGY

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
Tall Building Strategy	Blank Tall Building Strategy	St. George	Object as not sufficiently flexible, not effective. Policy BP7 seeks to focus tall buildings (as defined in Policy BD2) in the Growth Areas of Wembley and Alperton. Site Allocation BSWA7 - Northfields (“Grand Union”) comprises a fundamental part of the Growth Area. Grand Union is subject to planning permission ref. 18/0321 (as amended by application 19/2732). This permits a range of tall buildings up to 25 storeys, supported by existing adopted development plan policy and the Council’s own evidence base. To be effective, the Local Plan Proposals Map should include BSWA7- Northfields within the Tall Building Zone. It is important that the Local Plan allows enough flexibility to respond to the objectively assessed needs of Brent, and its population. The policies that affect BSWA7 should be flexible enough to allow for changes over the plan period. This means responding to the scale of development already granted planning permission and acknowledged within the Tall Building Strategy. Amend: Extend the Alperton Growth Area Tall Building Zone and Core to include Site Allocation BSWA7- Northfields	The Northfields development does contain buildings that in the context of the Tall Buildings policy would be regarded as tall, with the parameter heights on large parts of the permitted development 19/0465 over the equivalent of 10 storeys above ground level and therefore consistent with other areas identified as Tall Buildings Zones. As such it is considered justified that the Tall Buildings Zone and an Core for the Taller Buildings away from sensitive edges on the Policies Map should be extended to include the Northfields development site.	Amend the policies map to include the Northfields development site within the Tall Buildings Zone. Update the associated Tall Buildings Strategy to reflect this change.
Tall Building Strategy	Blank Tall Building Strategy	Sudbury Town Residents Association	Brent’s Tall Building Strategy is not community-led; it is development and profit-led and disregards the Sudbury Town Neighbourhood Plan. A statement that the Tall Building Strategy will not apply in Sudbury Town.	Brent's Tall Building Strategy is evidence-led, based on looking at where high PTAL ratings are located, locations of conservation areas, and where existing tall buildings are located (amongst other factors as outlined in the strategy). The Tall Building Strategy will help inform development decisions across the whole borough, and notes that Sudbury Town is not suitable to be allocated as a Tall Building Zone in which tall buildings (those of 10 storeys or more) are considered appropriate.	No Change.
Tall Building Strategy	Blank Tall Building Strategy	Quintain	Support identification of locations for tall buildings and that Growth Areas are included within these locations. The Tall Building Strategy has been revised and is now considered sound.	Support welcomed.	No Change.

INFRASTRUCTURE DELIVERY PLAN

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
Infrastructure Delivery Plan	Blank Infrastructure Delivery Plan	Metropolitan Police Service	Support reference to ‘policing and other criminal justice or community safety facilities’ within supporting text of policy BS11. We would like to meet to discuss how MET infrastructure requirements can be accounted for by S106 and CIL. Reference to Dedicated Ward Offices should be made in the IDP stating that the MET will liaise with developers on schemes referable to the Mayor.	Noted. See proposed changes.	Update Police section of IDP to reference need for Dedicated Ward Offices. Such facilities should be provided in certain circumstances and developers should liaise with the MET on schemes referable to the Mayor. A map was attached to identify key locations for delivery.
Infrastructure Delivery Plan	Blank Infrastructure Delivery Plan	Highways England	The Plan may be challenged as no Infrastructure Delivery Plan has been produced. Supporting schemes need to be identified, costed and have an outlined method of funding.	Noted. An Infrastructure Delivery Plan has been produced. It was made available on the Local Plan Evidence Base webpage during the consultation. The document will be updated on a rolling basis as and when new requirements present themselves throughout the Council's service providers and associated bodies.	Identify any highway schemes related to the M1 that become evident as the evidence base for the London Plan further addresses transportation impacts with inputs from Highways England.

HISTORIC ENVIRONMENT PLACEMAKING STRATEGY

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
Historic Environment Placemaking Strategy	Good Growth in Brent	Philip Grant (Wembley History Society)	the photograph beside paragraph 9.11 should read: '3 and 5 Buck Lane, Buck Lane Conservation Area.'	Note. See proposed change.	Historic Environment Placemaking Strategy photograph adjacent to 9.11 amend: "'3 and 4 5 Buck Lane....'"
Historic Environment Placemaking Strategy	Pages 24- 25 & 41	Philip Grant (Wembley History Society)	Local History Societies should be added to the references to local communities and residents' associations in the discussion box at the bottom of page 24, in objective 3, and the strategic objectives section.	Noted. See proposed change.	Local History Societies' added to the section on consultation for locally listed buildings.
Historic Environment Placemaking Strategy	Page 36	Philip Grant (Wembley History Society)	The heading at the top of the page incorrectly refers to Lidl, and should instead read: 'Iron age and Roman pottery found in 2013 on the site of the former "Blackbirds" public house, Blackbird Hill, Wembley'. The text at the bottom of the page should begin: 'Fragments of Iron Age and Roman pottery were found in 2013 ...'	Noted. See proposed change.	Historic Environment Placemaking Strategy Page 36 amend: "Iron age pottery found in 2013 on the site <u>of the former "Blackbirds" public house, underneath the Lidl supermarket Blackbird Hill, Wembley"</u> "
Historic Environment Placemaking Strategy	Blank Historic Environment Placemaking Strategy	Philip Grant (Wembley History Society)	Noted that Archaeological Priority Areas will be reviewed in 2020. Note map of St. Andrew's Old Church Archaeological Priority Area. This area should be extended by around 30m to the north east to Blackbird Hill in light of the 2013 excavation which revealed what appeared to be a Roman boundary ditch. This should include properties on both sides of Old Church Lane, and along the south east side of Tudor Gardens. Not sure if this can be included within the strategy, however, this should be put forward for consideration in the 2020 review.	Noted. The points made about St Andrew's Old Church Archaeological Priority Area will be shared with the Council's heritage officer and the area identified for consideration in the review of the Archaeological Priority Areas.	No Change.

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Appendix 4. Modifications Proposed to the draft Brent Local Plan October 2019 to be submitted for consideration as part of the Examination

1. This schedule sets out proposed Main and Minor Modifications to the draft Brent Local Plan October 2019 that it is proposed will be submitted for consideration as part of the Examination process to address representations of soundness and other representations on the documents contents, plus other changes considered appropriate to improve the Plan.
2. The proposed Modifications are generally expressed in the form of ~~strike through~~ for deletions of text and underlined for additions of text and are set out in the same order as the Local Plan.

Main modifications are included in the first schedule. These changes to policy wording. The second schedule contains Proposed Minor Modifications. These are changes to supporting text or factual, grammatical or other changes. A third schedule sets out the Proposed Changes to the Policies Map. A fourth schedule sets out changes to other documents supporting the Local Plan.

Main Modifications

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Proposed Modification	Reason for Modification
MM	Good Growth in Brent	Growing the Economy	"a) <u>As a 'provide capacity' borough in the London Plan,</u> make better use of Brent's ~~employment industrial land~~ through <u>a structured approach to deliver industrial its intensification and land release, where appropriate</u> and also where possible support additional housing/ community facilities through co-location".	Response to TfL commercial development representation on the need to recognise Brent's 'Provide Capacity' status.
MM	Good Growth in Brent	Creating a Healthy Borough	"e) <u>ensure that there is sufficient supply of indoor and outdoor sports provision to meet demand which will assist in increasing the levels of sports participation and physical activity within the Borough</u> "	Response to Sport England raising the need to include an overarching aim on sports provision.
MM	BP1	k)	"Intensification and higher residential densities will be supported around Wembley Park ~~Station~~ where it can be demonstrated development would take advantage of the area's good access to public transport."	Response to Quintain re: not appearing to restrict development to only in close proximity to the station.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Proposed Modification	Reason for Modification
MM	BP1	j)	"Introducing a greater proportion of ~~employment~~ <u>industrial</u> floorspace in new mixed-use developments on Watkin Road and First Way to the east of the Stadium than previously allocated in the Wembley Area Action Plan"	To be consistent with London Plan policy.
MM	Central/ South West	BCSA1 – 19, BSWSA8 – 12 & 17.	Site allocation policies (BCSA1-19 and BSWSA8-12 and BSWSA17) planning considerations to be amended: " <u>The site is located within the Wembley Opportunity Area and as such London Plan policies on Opportunity Areas are applicable.</u> "	Provide clarity on Wembley Opportunity Area for associated London Plan policies as sought by GLA.
MM	BCSA1	Planning Considerations	"....will seek no net loss of ~~employment~~ <u>industrial</u> floorspace....."	To be consistent with London Plan policy.
MM	BCSA1	Design Considerations	"....to take account of the setting of the opposite Grade 2 Listed former Town Hall, <u>Barn Hill conservation area</u> and not....."	To reflect designated heritage assets as identified by Historic England.
MM	BCSA1	Infrastructure Requirements	~~"Waste water facilities enhancement~~ <u>Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."</u>	Reflective of advice that Thames Water provided in relation to water infrastructure.
MM	BCSA2	Planning Considerations	~~"....The Fountain Studios is a cultural facility, which in the context of Wembley's identification in the London Plan as a Cultural Area of strategic importance, Brent's London Borough of Culture 2020 status and the desire to support the evening economy would ideally be replaced with another cultural facility....."~~	Remove requirement taking account of decision by planning committee to mind to approve an application with no replacement provision as identified by Quintain.
MM	BCSA2	Infrastructure requirements	<u>"Waste water facilities enhancement Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will</u>	Reflective of advice that Thames Water provided in

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Proposed Modification	Reason for Modification
			<u>need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."</u>	relation to water infrastructure.
MM	BCSA3	Planning Considerations	~~" Waste water facilities enhancement Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."~~	Relocated to Infrastructure requirements for consistency.
MM	BCSA3	Infrastructure requirements	~~" Waste water facilities enhancement Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."~~	Relocated from planning considerations as more appropriate in this section.
MM	BCSA4	Indicative Capacity	~~"Up to 700 500 dwellings (residential and student accommodation). Employment industrial space and hotel space to be confirmed."~~	Reflect dwellings reduction due to increased industrial floorspace provision requirements.
MM	BCSA4	Timeframe for Delivery	0-5 years ~~"200 450"~~ 5-10 years ~~"500 50"~~	Timescales amended to reflect delivery information provided by the site's owners.
MM	BCSA4	Planning Considerations	~~"....will seek no net loss of employment industrial floorspace....."~~	To be consistent with London Plan policy.
MM	BCSA4	Risks	~~"Existing employment industrial use of the site means that the policy context has changed from when the site was~~	To be consistent with London Plan policy.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Proposed Modification	Reason for Modification
			allocated in the Wembley Area Action Plan. As such re-provision of ~~employment industrial space~~ "	
MM	BCSA4	Planning Considerations	~~"A critical trunk sewer runs through this site which would need to be considered Waste water facilities enhancement Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."~~	Reflects information provided by Thames Water and relocation of remainder to Infrastructure requirements.
MM	BCSA4	Infrastructure requirements	~~" Waste water facilities enhancement Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."~~	Relocated from planning considerations as more appropriate in this section.
MM	BCSA5	Planning Considerations	~~"...potential CNWL/further/higher education campus. <u>Its town centre location also makes it suitable for office-led mixed-use development.</u>"~~	Response to representation from GLA that identified office development as appropriate.
MM	BCSA5	Planning Considerations	~~"A critical trunk sewer runs through this site which would need to be considered Waste water facilities enhancement Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to~~	Reflects information provided by Thames Water and relocation of remainder to Infrastructure requirements.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Proposed Modification	Reason for Modification
			~~the development creating identified additional capacity requirements."~~	
MM	BCSA5	Infrastructure requirements	" <u>Waste water facilities enhancement Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</u> "	Relocated from planning considerations as more appropriate in this section.
MM	BCSA6	Indicative Capacity	" Assumed ~~1000~~ <u>838</u> dwellings on basis of density of existing permissions prior to more detailed assessment, plus ~~employment~~ <u>industrial</u> floorspace at ground floor."	Align terminology with London Plan and reduction due to methodology of counting student scheme.
MM	BCSA6	Timeframe for delivery	"0-5 years ~~500~~ <u>342</u> , 5-10 years 350, 10+ years ~~150~~ <u>138</u> "	Reflection of amendment of methodology of converting student scheme to dwellings.
MM	BCSA6	Planning Considerations	"....loss of existing ~~employment~~ <u>industrial</u> land was considered appropriate in the WAAP, Brent's London Plan 'provide capacity' status for ~~employment~~ <u>industrial</u> means that ~~employment~~ <u>industrial</u> floorspace at least on the ground floor of 0.65 plot ratio...."	Align terminology with London Plan.
MM	BCSA6	Planning Considerations	"..Development in proximity to the <u>north-eastern</u> part of the site (<u>adjacent to Wembley Business Park</u>) must adopt the 'agent of change'..."	Provides more clarity on the location of agent of change principle being a significant consideration.
MM	BCSA6	Planning Considerations	~~"Waste water facilities enhancement Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a~~	Relocation to Infrastructure requirements.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Proposed Modification	Reason for Modification
			~~housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."~~	
MM	BCSA6	Infrastructure requirements	<u>"Waste water facilities enhancement Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."</u>	Relocated from planning considerations as more appropriate in this section.
MM	BCSA7	Allocated Use	~~"Mixed-use residential-led development to include replacement of the existing office space TfL ancillary accommodation"~~	To reflect need to address TfL needs, rather than requiring general office provision.
MM	BCSA7	Time Frame for Delivery	0-5 Years " ~~150~~ <u>375</u> " 5-10 years " ~~250~~ <u>100</u> "	Better reflects number of dwellings and their timing of delivery.
MM	BCSA7	Planning Considerations	<u>"The development should not compromise the ability to add potential platforms at Wembley Park station on the Chiltern Line Aylesbury Branch."</u>	Need to reflect potential within the existing line to provide additional platforms.
MM	BCSA7	Planning Considerations	~~"Waste water facilities enhancement Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."~~	Relocation to Infrastructure requirements.
MM	BCSA7	Design Principles	~~"Buildings may step up to four or five storeys heights should mediate between the taller buildings on Matthews Close and the character of development along Forty Avenue and~~	Reduce prescription to provide for justified

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Proposed Modification	Reason for Modification
			further to the north, however the northern site is not suitable for tall buildings of a significant scale."	solution at time of planning application.
MM	BCSA7	Infrastructure requirements	" <u>Waste water facilities enhancement Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</u> "	Relocated from planning considerations as more appropriate in this section.
MM	BCSA8	Planning Considerations	"remaining ~~employment~~ <u>industrial</u> floorspace."	Consistency with London Plan.
MM	BCSA8	Planning Considerations	~~"Waste water facilities enhancement Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."~~	Relocation to Infrastructure requirements.
MM	BCSA8	Infrastructure requirements	" <u>Waste water facilities enhancement Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</u> "	Relocated from planning considerations as more appropriate in this section.
MM	BCSA9	Allocated Use	"Residential-led mixed-use development, including student accommodation/education and ~~business~~ <u>industrial</u> ."	Align terminology with London Plan.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Proposed Modification	Reason for Modification
MM	BCSA9	Indicative capacity	"1200 <u>1262</u> "	Reflects updated understanding of potential delivery
MM	BCSA9	Time Frame for Delivery	0-5 Years " <u>269</u> " 5-10 years " <u>557</u> " 10+ years " <u>436</u> "	Inserts missing information based on trajectory.
MM	BCSA9	Planning Considerations	.. ~~"It still contains numerous occupied business industrial premises....."~~ and "...maximum re-provision of ~~business industrial uses.....~~ "	Align terminology with London Plan.
MM	BCSA9	Planning considerations	<u>The site includes a West London Waste Plan protected site. This should be accommodated in the redevelopment, or suitable capacity for the waste function provided elsewhere.</u>	Reflects protected waste site need for re-provision.
MM	BCSA9	Planning Considerations	~~"Waste water facilities enhancement Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."~~	Relocation to Infrastructure requirements.
MM	BCSA9	Design Principles	"...Where ~~business industrial~~ premises are being provided on-site, the design should support the amenity of both residential and ~~business industrial~~ uses..."	To provide clarity and consistency with London Plan definitions.
MM	BCSA9	Infrastructure requirements	<u>" Waste water facilities enhancement Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."</u>	Relocated from planning considerations as more appropriate in this section.
MM	BCSA9	Justification	"..potentially accommodate ~~business industrial~~ premises...."	Align terminology with London Plan.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Proposed Modification	Reason for Modification
MM	BCSA10	Planning Considerations	~~“ Waste water facilities enhancement Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.”~~	Relocated to Infrastructure requirements.
MM	BCSA10	Infrastructure requirements	<u>“ Waste water facilities enhancement Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.”</u>	Relocated from planning considerations as more appropriate in this section.
MM	BCSA11	Infrastructure requirements	<u>“Waste water facilities enhancement Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.”</u>	Reflects advice received from Thames Water.
MM	BCSA12	Planning Considerations	“means that no-net loss of <u>employment industrial</u> floorspace”	Consistency with London Plan.
MM	BCSA12	Planning Considerations	~~“ Waste water facilities enhancement Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.”~~	Relocated to Infrastructure requirements.

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MM	BCSA12	Infrastructure requirements	<u>“Waste water facilities enhancement Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.”</u>	Relocated from planning considerations as more appropriate in this section.
MM	BCSA12	Justification	“..re-providing employment <u>industrial</u> space...”	Consistency with London Plan.
MM	BCSA17	All	~~Southway Motors/Fourway Supplies/ Midnight Motors, South Way, HA9 0HB, 0.33, Repair garages and storage, Business and residential, 60, Re-provision of business floorspace at 0.65 plot ratio required. Ground floor active frontage along South Way.~~	Removed as conflict with SIL designation where only intensification is allowed.
MM	BCSA19	Site Area	"0.34"	Measurement provided by TfL commercial development.
MM	BP2	e)	“...taking account of the need to support additional <u>employment industrial</u> space on site...”	To be consistent with the London Plan.
MM	BP2	k)	~~"Securing sufficient physical and social Infrastructure on and off site to support the Meeting social infrastructure requirements by securing provision for needs arising from new housing development, especially the provision of new education, health, cultural and community facilities, notably at Staples Corner and Neasden Stations' Growth Areas, in particular and ensuring the improvement of the Welsh Harp and its setting.~~	More clarity on range of infrastructure in response to CCG.
MM	BP2	m)	"Retaining and encouraging intensification of ~~employment~~ B1c, B2 and B8 industrial uses at Kingsbury Locally Significant Industrial Site.	Alignment with the London Plan.

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MM	BEGA1	Allocated use	"Growth Area - ~~Strategic Industrial Location and Locally Significant Industrial Sites~~ subject...."	Amend to reflect new designation status with regards to SIL.
MM	BEGA1	Description of site	"The site comprises ~~Strategic Industrial Location and Locally Significant Industrial Sites~~"	Amend to reflect new designation status with regards to SIL.
MM	BEGA1	Planning Considerations:	"A significant part of the site is ~~Strategic Industrial Land/ Locally Significant Industrial Site~~" and "0.65 for the current ~~SIL and LSIS~~ sites useable ~~employment~~ <u>industrial</u> floorspace....."	Amend to reflect new designation status with regards to SIL and reference industrial to be consistent with the London Plan.
MM	BEGA1	Planning considerations:	<u>"The masterplanning exercise will be undertaken involving key stakeholders, landowners and developers to help shape its content from conception to completion."</u>	Reference need to include all stakeholders in masterplanning process.
MM	BEGA1	Planning Considerations:	"Apart from the railway corridors <u>which are Sites of Importance for Nature Conservation (SINC)</u> , there is very little of ecological value...."	Identifies SINC status of part of the site.
MM	BEGA1	Planning Considerations:	<u>"The presence of an existing active rail aggregate depot to the west plus matters such as the proximity to operational railways and the need to re-provide industrial uses on site needs to be considered to ensure future development proposals do not place unreasonable restrictions on non-residential uses whilst creating a high quality residential environment."</u>	Further consideration of the need to not undermine an adjacent site's function.
MM	BEGA1	Planning considerations:	<u>"Development around the existing or proposed rail stations and close to infrastructure should take account of operational requirements and the potential need to provide mitigation for any impacts."</u>	To ensure development better considers rail operation as sought by TfL spatial planning.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Proposed Modification	Reason for Modification
MM	BEGA1	Planning considerations:	" <u>Masterplanning should consider the potential for a future bus/cycle/pedestrian link between Neasden Lane and Great Central Way and if possible allow sufficient space within layout to allow this longer term aspiration to be delivered.</u> "	To ensure development better considers potential for future links as sought by TfL spatial planning.
MM	BEGA1	Planning considerations	<u>The site includes a West London Waste Plan protected site. This should be accommodated in the redevelopment, or suitable capacity for the waste function provided elsewhere.</u>	Reflects protected waste site need for re-provision.
MM	BEGA1	Infrastructure requirements:	" <u>Neasden station has a constrained ticket hall and stairways. TfL has identified that there may be a need to consider station improvements to accommodate development related demand, with associated financial contributions.</u> "	To ensure development better considers limited capacity of station operation currently as sought by TfL spatial planning.
MM	BEGA1	Infrastructure requirements:	"...space for proposed public transport improvements including the West London Orbital line and station <u>with potential for platforms for up to 8 car-trains...</u> "	To not potentially compromise flexibility for extension of platforms in the future.
MM	BEGA1	Risks:	"...existing housing sites or ~~employment~~ <u>industrial</u> sites..."	Consistency with the London Plan.
MM	BEGA1	Design Principles:	"...the area to prosper as an ~~employment~~ <u>industrial</u> location..."	Consistency with the London Plan.
MM	BEGA1	Justification:	"...low intensity used ~~Strategic Industrial Land~~ and Locally Significant Industrial Sites..."	Reflect LSIS status of industrial sites as shown on policies map.
MM	BEGA1	Justification:	"...Given Brent's status as a 'provide capacity' borough for ~~employment~~ <u>industrial</u> space in the London Plan, the ~~SIL~~ and LSIS also provide a vital role in meeting future ~~employment~~ <u>industrial</u> needs..."	Reflect London Plan policy and LSIS status of industrial sites as shown on policies map.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Proposed Modification	Reason for Modification
MM	BEGA2	Planning considerations	“...ideally increase useable ~~employment~~ <u>industrial</u> floorspace (predominantly light industrial, industrial and storage and distribution) representing a 0.65 plot ratio or replacement of the existing amount of ~~employment~~ <u>industrial</u> floorspace...” “..adjacent ~~employment~~ <u>industrial</u> uses will...”	Provide consistency with London Plan terminology.
MM	BEGA2	Planning considerations	“...Brent Cross West Thameslink station will open in ~~2024~~ <u>2022</u> ...”	Clarification of station opening timescales following funding provision.
MM	BEGA2	Planning considerations	"....Open Space, <u>Brent Reservoir</u> Site of Special Scientific Interest, Site of....." "...breeding wetland birds. <u>Natural England have also identified, given the ecological status of the area, the need to protect the SSSI particularly with regards to potential disturbance from visitor recreational activities.</u> "	Increase emphasis on SSSI as requested by Natural England.
MM	BEGA2	Planning Considerations:	" <u>The Council together with TfL will consider the extent to which the area can support car-free development and mitigate impacts through suitable improvements to public transport, active travel and measures to not adversely impact on neighbours' amenity of any potential parking displacement. There is a need to work with TfL and Barnet Council to provide improved links from the site to the proposed new station and wider Brent Cross regeneration area.</u> "	Further reduce car use and ensure residents are not adversely impacted in response to TfL spatial planning.
MM	BEGA2	Design principles	“...prosper as an ~~employment~~ <u>industrial</u> location.”	Provide consistency with London Plan terminology.
MM	BEGA2	Justification	“...vital role in meeting future ~~employment~~ <u>industrial</u> needs...”	Provide consistency with London Plan terminology.
MM	BESA1	Allocated Use	"...replacement of the existing B1(c), B2 and B8 ~~floorspace~~ <u>uses</u> and on the McDonalds site A1-A5 and/or B1(c), B2	Bring into alignment with London Plan.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Proposed Modification	Reason for Modification
			<u>and</u> B8 employment uses...”	
MM	BESA1	Indicative Capacity:	"... ~~3886~~ 5647 sqm B1-B8 on the existing ~~employment~~ <u>industrial</u> sites (0.65 plot ratio) and 400 sqm A1-A5 uses/B1(c), B2 <u>and</u> B8 on the McDonalds...”	Bring into alignment with London Plan.
MM	BESA1	Justification	“...ensure continued provision of ~~employment~~ <u>industrial</u> space, so will seek its retention of ~~employment~~ <u>these</u> uses on site.”	Bring into alignment with London Plan.
MM	BESA2	Indicative capacity:	“10,000 sqm Sui Generis <u>based</u> on the existing ~~employment~~ <u>industrial</u> site’s floorspace required to replace bus depot/ create suitable residential environment above, plus 202 dwellings.”	Reflects known ownership details.
MM	BESA2	Ownership:	“ ~~Public and Private Sector~~ ”	Reflects known ownership details.
MM	BESA2	Planning considerations	“ ~~Any proposal must ensure the replacement of the bus depot or, An operational bus garage of equivalent capacity needs to be retained/re-provided on the site unless TfL confirms that it is no longer operationally required, or a suitable replacement can be provided elsewhere.~~ ”if-If operationally this is.....”	To address bus infrastructure needs as sought by TfL Spatial Planning.
MM	BESA2	Planning considerations	“...appropriate if the minimum ~~employment~~ <u>industrial</u> floorspace is provided.....”	To be consistent with London Plan.
MM	BESA2	Justification	“...The council needs to ensure continued provision of employment space, so will seek the retention of the bus depot or replacement ~~employment~~ <u>industrial</u> space on this site.....”	To be consistent with London Plan.
MM	BP3	d)	"...taking into account the need to intensify ~~employment~~ <u>industrial</u> use on the site."	To be consistent with London Plan.

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MM	BP3	s)	"...Supporting new and improved employment <u>industrial</u> premises."	To be consistent with London Plan.
MM	BP3	m)	"m) <u>Meeting social infrastructure requirements by securing provision for needs arising from new housing development, especially the provision of new education, health, cultural and community facilities, notably at</u> ~~Secure sufficient physical and social infrastructure on and off site to support an increase in population at~~ Burnt Oak and Colindale"	More clarity on social infrastructure to be provided in response to Brent CCG.
MM	BNGA1		"...The existing Locally Significant Industrial Sites will be subject to masterplanning with a view to its regeneration to re-provide updated ~~employment industrial~~ floorspace that meets employers existing and future needs, through co-location with other uses....."	Consistency with the London Plan.
MM	BNSA1	Allocated Use	"Mixed-use development comprising areas of ~~employment industrial~~ intensification and..."	Consistency with the London Plan.
MM	BNSA1	Existing use	" ~~Transitioning mixed use and a~~ Locally significant industrial site containing a range of uses..."	Clarify existing uses wider than industrial.
MM	BNSA1	Time scale	"0-5 years ~~14~~ <u>414</u> "	Typo - delivery to reflect planning permission.
MM	BNSA1	Indicative Capacity	A future masterplanning process <u>involving site owners/occupiers and other stakeholders</u> will provide clarity...."	Clarification of engagement as part of the masterplan.
MM	BNSA1	Description of the site	"...Located to the <u>east of the LSIS within the site allocation</u> is a car dealership and associated <u>servicing workshops</u> , parking/ storage land. A petrol station forms the north ~~eastern~~ <u>western</u> corner."	Reflects wider range of uses on site and accuracy update.
MM	BNSA1	Planning considerations	".....impact assessment. <u>Similarly the retention of a retail car dealership function on the Mercedes site is also considered appropriate if required as part of an intensification of floorspace and provision of other allocated uses on that site.</u> "	To provide clarity on the car dealership.

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MM	BNSA1	Planning considerations	"....Locally Significant Industrial Site. <u>The Council considers it appropriate for co-location which will be delivered consistent with London Plan policy E7.</u> The whole...."	Clarify co-location status consistent with London Plan policy.
MM	BNSA1	Planning considerations	"....how it can increase useable employment <u>industrial</u> floorspace..."	Clarify for consistency with London Plan policy.
MM	BNSA1	Design Principles	"...enhance its <u>industrial</u> /employment function...."	Clarify for consistency with London Plan policy.
MM	BNSA1	Design Principles	"...Access to the site to be considered carefully to ensure no conflict is created between different users <u>and the potential for north-south and east-west pedestrian and cycle connections in particular between Stag Lane and Edgware Road to be enhanced in number and quality....</u> "	Identify increased connectivity principles.
MM	BNSA1	Policy Justification	".....Furthermore, the intensification/ colocation of the LSIS <u>and Capitol Way Valley with the Burnt Oak and Colindale Growth Area</u> will contribute to meeting the 'provide capacity' status given to Brent within the London Plan. Currently, although the vacancy rates are low, the site is not intensively used and contains a number of two storey buildings that vary in condition. ~~The LSIS~~ Capitol Way Valley also has good access to services and amenities which will support intensification/ co-location."	Consistency with London Plan policy and factual update on access for the allocation.
MM	BNSA2	Allocated use	"Mixed use development to include residential, retail and employment <u>replacement industrial and office space/affordable workspace.</u> "	Consistency with London Plan and BE2 and BE3.
MM	BNSA2	Description of Existing Site	"Forming the southern part of the site is a car dealership, <u>servicing centre/workshop</u> and associated car parking."	To identify that the site has some industrial use provision of which will need to be reconsidered to

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				be consistent with the London Plan.
MM	BNSA2	PTAL rating	The PTAL rating of the site varies from 2-3 4. The majority of the northern and southern part is within PTAL rating 2, with the central part achieving PTAL rating 3-4.	To reflect PTAL scores as identified through representation received.
MM	BNSA2	Planning considerations	<u>"The site contains some existing Local Employment Sites in the form of industrial floorspace related to the servicing of vehicles as part of the car dealership and the office provision of Southon House. Consistent with the borough's provide capacity status in the London Plan the industrial floorspace should be replaced in line with London Plan policy E7. The office space will be subject to Brent policy BE3. As it is out of centre, the site is not a priority location for retail in terms of the sequential test. Nevertheless, the Council is aware that the retail element appears to be trading well, so is likely (subject to other London Plan and Local Plan retail policies) be receptive to re-provision of some retail if it is necessary from a viability perspective to encourage the site's more intensive development that makes for a more efficient use of land."</u>	Clarification of the approach in relation to the existing uses on site.
MM	BNSA2	Planning considerations	BNSA2 Planning considerations: ~~"Development at this site should avoid having any detrimental impact on the setting of this building."~~	To reflect the limited weight to be attached to the non-designated heritage asset status of the school.
MM	BNSA2	Risks	<u>"access to be reconsidered. This may increase costs affecting viability or slow down delivery."</u>	To clarify why access arrangements may be a risk.
MM	BNSA3	Planning considerations	~~"...No permissions for non-employment industrial uses within the LSIS will be allowed...."~~ "...Noise associated with the continued industrial use, or intensification of ~~employment~~ industrial uses on site...."	Consistency with the London Plan.

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MM	BNSA3	Planning considerations	<u>"Development close to the rail station and rail infrastructure will need to take into account operational requirements and the potential need to provide mitigation for any impacts."</u>	Reflects need to better consider the impact of the railway as sought by TfL spatial planning.
MM	BNSA3	Design considerations	"LSIS sites to ensure the area continues to prosper as an ~~employment~~ <u>industrial</u> location."	Consistency with the London Plan.
MM	BNSA3	Justification	"...the proposed intensification and co-location at these sites will contribute towards meeting future ~~employment~~ <u>industrial</u> needs...."	Consistency with the London Plan.
MM	BNSA4	Infrastructure Requirements	<u>"Thames Water will need to be engaged at the earliest opportunity to agree an infrastructure phasing plan to ensure essential water infrastructure is delivered prior to being required to meet additional demands created through the development."</u>	Additional infrastructure requirement as identified by Thames Water.
MM	BP4	After i)	<u>" Meeting social infrastructure requirements by securing provision for needs arising from new housing development, especially the provision of new education, health, cultural and community facilities, notably at As part of the development within the Northwick Park Growth Area where the following improvements to community and cultural facilities should be achieved:"</u>	More clarity on social infrastructure to be provided in response to Brent CCG.
MM	BP4	h)	"Protecting and enhancing playing ~~pitch~~ <u>field</u> provision at....."	Align terminology with national policy as sought by Sport England.
MM	BP4	h)	"....Claremont High School, <u>John Billam Playing Fields</u> and Tenterden Sports Ground"	Reflects local importance of facilities.
MM	BNWGA1	Ownership	<u>"Transport for London own Northwick Park station and adjacent railway land."</u>	Land ownership identified by TfL Spatial Planning.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Proposed Modification	Reason for Modification
MM	BNWGA1	Planning Considerations:	"...A ball strike assessment will be required <u>and any necessary ball stop mitigation implemented prior to the development's impact</u> to ensure that new development does not compromise the role of the MOL in terms of sports provision...."	Strengthen requirement as requested by Sport England
MM	BNWSA1	Ownership	BNWSA1 Ownership amend: " ~~Private and small part public ownership~~ "	Status of confirmed ownership.
MM	BNWSA1	Planning considerations	" <u>If parking is provided it should be made publically available and be designed to serve the wider town centre.</u> "	Clarification sought by TfL spatial planning.
MM	BNWSA1	Planning considerations	" <u>Development close to the rail station and rail infrastructure will need to take into account operational requirements and the potential need to provide mitigation for any impacts.</u> "	Clarification sought by TfL spatial planning.
MM	BP5	j)	"Co-location of ~~employment~~ <u>industrial</u> and residential uses at Church End Locally Significant Industrial Sites, subject to the requirements in policy BE2."	Consistency with the London Plan.
MM	BP5	k)	"Retaining and encouraging intensification of ~~employment~~ <u>industrial</u> and residential uses at Brentfield Locally Significant Industrial Site."	Consistency with the London Plan.
MM	BP5	Before m)	" <u>mi) Meeting social infrastructure requirements by securing provision for needs arising from new housing development, especially the provision of new education, health, cultural and community facilities</u> "	Reflect wider range of social infrastructure as sought by CCG.
MM	BSGA1		"..The redevelopment of industrial sites for co-location will secure investment in new ~~employment~~ <u>industrial</u> floorspace and improve environmental quality...."	Consistency with the London Plan.
MM	BSSA1	Allocation	"Mixed-use residential, ~~employment~~ <u>industrial</u> and supporting community facilities"	Reflects better understanding of potential

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				capacity and prior approval.
MM	BSSA1	Indicative Capacity	" ~~380~~ <u>414</u> "	Reflects better understanding of potential capacity and prior approval.
MM	BSSA1	Delivery timeline	0-5 years " <u>34</u> " 6-10 years " <u>24 120</u> " 10+ years " ~~380~~ <u>260</u> "	Reflects minded to approve scheme.
MM	BSSA1	Planning Considerations	"...It will be subject to a masterplan-led approach, demonstrating comprehensive development will result in a net increase in ~~employment~~ <u>industrial</u> floorspace..."	Consistency with the London Plan.
MM	BSSA1	Justification	"...to provide increased ~~employment~~ <u>industrial</u> capacity, mixed-use development will be subject to a net increase in ~~employment~~ <u>industrial</u> floorspace..."	Consistency with the London Plan.
MM	BSSA2	Allocated use	"Housing, ~~employment~~ <u>industrial</u> and supporting community facilities"	Consistency with the London Plan.
MM	BSSA2	Planning considerations	"..This will demonstrate comprehensive development <u>and</u> will result in a net increase in ~~employment~~ <u>industrial</u> floorspace...."	Consistency with the London Plan.
MM	BSSA2	Justification	"...to provide increased ~~employment~~ <u>industrial</u> capacity, mixed-use development will be subject to a net increase in ~~employment~~ <u>industrial</u> floorspace..."	Consistency with the London Plan.
MM	BSSA4	Allocated use	"Mixed-use housing, ~~employment~~ <u>industrial</u> and supporting community facilities"	Consistency with the London Plan.
MM	BSSA4	Indicative capacity	" ~~200~~ <u>300</u> "	Reconsideration of potential capacity.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Proposed Modification	Reason for Modification
MM	BSSA4	Timeframe for delivery	5-10 years " <u>200</u> " 10+ years " ~~200~~ <u>100</u> ".	Reflects capacity changes and timing.
MM	BSSA4	Planning considerations	"..in a net increase in ~~employment~~ <u>industrial</u> floorspace...."	Consistency with the London Plan.
MM	BSSA4	Justification	"...to provide increased ~~employment~~ <u>industrial</u> capacity, mixed-use development will be subject to a net increase in ~~employment~~ <u>industrial</u> floorspace..."	Consistency with the London Plan.
MM	BSSA5	Ownership	Amend to: " ~~Public/Private~~ "	Factual update.
MM	BSSA5	Planning considerations	" <u>An operational bus garage of equivalent capacity needs to be retained/re-provided on the site unless TfL confirms that it is no longer operationally required, or a suitable replacement can be provided elsewhere.</u> "	Clarification sought by TfL spatial planning.
MM	BSSA5	Infrastructure requirements	"... <u>Thames Water have indicated that currently there are no significant concerns with regards to water supply or waste water capacity for this site. Nevertheless, liaison is encouraged with Thames Water prior to any application to identify whether any upgrades are required as a result of development.</u> "	In response to Thames Water.
MM	BSSA6	Timeline for delivery	"0-5 years ~~440~~ <u>569</u> , 5-10 Years ~~100~~ "	Reflects delivery of existing development proposals.
MM	BSSA6	Allocated use	"Residential, <u>with potential for</u> affordable workspace, supporting community and cultural uses and small scale retail"	Takes account of uncertainty of extent of delivery on site due to flood zone location.
MM	BSSA6	Planning considerations	"The site <u>was until recently predominantly in employment use contains a light industrial units. Re-provision of affordable workspace will be required to mitigate the loss of this unit.</u> The London Plan identifies Brent as a 'provide	Reflect policy requirement for additional industrial in the form of workspace to

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Proposed Modification	Reason for Modification
			capacity' borough in terms of industrial employment floorspace, ~~and as~~ <u>As such provision of some affordable workspace will be sought on site as part of the potential uses associated with a new mixed use community. an</u> ~~an increase in employment floorspace will be sought.~~	support the 'provide capacity' status.
MM	BSSA6	Planning considerations	"It has a poor public realm which needs to be improved, <u>subject to agreement being reached between the Council and landowners.</u> "	Reflects land for improvements might not be in the ownership of the developers.
MM	BSSA6	Planning considerations	<u>"The development will need to mitigate impacts upon rail infrastructure, and contributions toward capacity and step free access improvements at Stonebridge Park station will be sought."</u>	Taking account of TfL spatial planning on station capacity.
MM	BSSA6	Planning considerations	"...Car free development will be encouraged, subject to a Controlled Parking Zone being ~~achieved~~ <u>achievable</u> ..."	Reflects flexibility recognising that the development may be occupied before a CPZ is delivered.
MM	BSSA7	Planning considerations	<u>"The development will need to mitigate impacts upon rail infrastructure, and contributions toward capacity and step free access improvements at Stonebridge Park station will be sought."</u>	Taking account of TfL spatial planning on station capacity.
MM	BSSA7	Planning considerations	"...Car free development will be encouraged, subject to a Controlled Parking Zone being ~~achieved~~ <u>achievable</u> ..."	Reflects flexibility recognising that the development may be occupied before a CPZ is delivered.
MM	BSSA7	Design principles	<u>"...The site has been identified as part of a Tall Buildings Zone.</u> In this context higher density development is appropriate and it is considered that this area is suitable for	Provide clarity with regards to tall buildings on site.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Proposed Modification	Reason for Modification
			tall buildings, subject to being of high architectural quality, ~~and~~ providing a high standard of amenity <u>and respecting local character</u> "	
MM	BSSA8		Allocated use "Residential and ~~employment~~ <u>industrial</u> " Comments "Consistent with policy BE3 an increase in ~~employment~~ <u>industrial</u> floorspace will be sought as part of any redevelopment."	Consistency with the London Plan.
MM	BSSA9		Comments "Consistent with policy BE3 an increase in ~~employment~~ <u>industrial</u> floorspace will be sought as part of any redevelopment....".	Consistency with the London Plan.
MM	BSSA13	Indicative Homes	" ~~15~~ <u>26</u> "	Reflects minded to approve scheme.
MM	BP6	l)	" <u>Meeting social infrastructure requirements by securing provision for needs arising from new housing development, especially the provision of new education, health, cultural and community facilities notably</u> ~~Securing infrastructure in South Kilburn to include a new community space, 3 form of entry primary school and nursery and other community uses.~~ "	Reflect wider range of social infrastructure as sought by CCG.
MM	BP6	m)	"Enhance and protect playing <u>fields</u> ~~pitches~~ at Gladstone Park and..."	National definition consistency sought by Sport England.
MM	BP6	q)	"The conversion of vehicle repair premises on Hassop Road to ~~employment~~ <u>industrial</u> uses which improve amenity for neighbouring residential units will be supported..."	Consistency with London Plan.
MM	BSESA5	Indicative capacity	" ~~120~~ <u>50 net (121 gross)</u> "	Reflects capacity taking account of demolition.
MM	BSESA5	Timeline for delivery	0-5 years " ~~20~~ <u>121</u> " 6-10 years " ~~100~~ <u>71</u> "	Reflects capacity taking account of demolition.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Proposed Modification	Reason for Modification
MM	BSESA8	Indicative capacity	"202 <u>96 net (250 gross)</u> "	Reflects capacity taking account of demolition.
MM	BSESA8	Timeline for delivery	0-5 years " ~~202~~ <u>96</u> "	Reflects capacity taking account of demolition.
MM	BSESA11	Indicative capacity	" ~~10~~ <u>20</u> "	More work done on site capacity.
MM	BSESA11	Timeline for delivery	0-5 years " ~~10~~ <u>20</u> "	More work done on site capacity.
MM	BSESA12	Indicative capacity	" ~~Unknown~~ <u>-40 net</u> "	Reflects capacity taking account of demolition.
MM	BSESA12	Timeline for delivery	0-5 years " ~~-40~~ "	Reflects capacity taking account of demolition.
MM	BSESA12	Infrastructure requirements	"Thames Water will need to be engaged to ~~establish impact on water supply network and water treatment infrastructure at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered ahead of development prior to the development creating identified additional capacity requirements...~~ "	Advice from Thames Water.
MM	BSESA16	Infrastructure requirements	" ~~..Thames Water has indicated the scale of development could require upgrades to water supply capacity and is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.~~ "	Advice from Thames Water.
MM	BSESA18	Planning considerations	"Policy B6 (~~p-g~~) promotes the conversion of premises on Hassop Road to ~~employment~~ <u>industrial</u> uses which improve amenity for neighbouring residential ~~units~~ <u>properties</u> ." "...as such, an increase in ~~employment~~ <u>industrial</u> floorspace will be required..."	Consistency between Local Plan policies and also London Plan.

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MM	BSESA18	Infrastructure requirements	" <u>Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</u> "	Advice from Thames Water.
MM	BSESA18	Justification	"...As such, an increase in ~~employment~~ <u>industrial</u> floorspace will be sought..."	Consistency with London Plan.
MM	BSESA21	Existing use	"Supermarket, car parking and an ~~employment~~ <u>industrial</u> use"	Consistency with London Plan.
MM	BSESA21	Allocated use	"Mixed-use including housing, retail and ~~employment~~ <u>industrial</u> uses"	Consistency with London Plan.
MM	BSESA21	Planning considerations	"...An increase in ~~employment~~ <u>industrial</u> floorspace will be required as part of any redevelopment...."	Consistency with London Plan.
MM	BSESA21	Justification	"...The site contains an existing ~~employment~~ <u>industrial</u> use. The draft London Plan requires Brent to provide additional ~~employment~~ <u>industrial</u> floorspace capacity. As such an increase in ~~employment~~ <u>industrial</u> floorspace will be sought. Retention of ~~employment~~ <u>industrial</u> floorspace in this location..."	Consistency with London Plan.
MM	BSESA22		Indicative homes " ~~20 42~~ " Comments " ~~17/0322 pending decision~~ <u>mind to approve</u> "	To reflect planning decision.
MM	BSESA25		Indicative homes " ~~50 70~~ " Comments " ~~17/5291 allowed at appeal~~ "	To reflect planning permission.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Proposed Modification	Reason for Modification
MM	BSESA28		Allocated use: Mixed-use ~~employment~~ <u>industrial</u> and residential	To reflect planning permission.
MM	BSESA34	Indicative homes	" ~~Unknown~~ <u>20</u> "	Estimate of capacity based on size and context.
MM	BSESA35		Allocated use: " Residential and ~~employment in the b use class~~ <u>industrial</u> Comments: "An uplift in ~~employment~~ <u>industrial</u> floorspace will be required as part of any redevelopment."	Consistency with the London Plan.
MM	BP7	b)	"Respecting the low-rise character of the Sudbury and Wembley suburban residential areas, through focussing tall buildings (as defined in Policy BD2) in the Growth Areas of Wembley and Alperton ~~and in intensification corridors.~~ <u>and</u> In the intensification corridors of A404 Harrow Road and A4005 Bridgewater Road/ Ealing Road, A4089 Ealing Road, A404 Watford Road ~~buildings where~~ around 15 metres (5-storeys) could be appropriate and in Sudbury and Ealing Road town centres where ~~buildings~~ around 15-18 metres (5-6 storeys) could be appropriate."	Clarification in relation to St George representation.
MM	BP7	j)	"Introducing mixed-use development to ~~employment~~ <u>industrial</u> sites around the junction of Ealing Road and Bridgewater Road..."	Consistency with the London Plan.
MM	BSWGA1		"The area will be a location for taller buildings at its Ealing Road and Northfields ends, with principally mid-rise in between."	Increase emphasis.
MM	BSWSA1	Planning considerations	"there must be at a minimum replacement of the existing amount of ~~employment~~ <u>industrial</u> floorspace or 0.65 plot ratio, whichever is the greater across the sites. The configuration of ~~employment~~ <u>industrial</u> floorspace will be agreed as part of the forthcoming masterplan process..."	Consistency with the London Plan.
MM	BSWSA1	Planning considerations	" <u>An operational bus garage of equivalent capacity needs to be retained/re-provided on the site unless TfL confirms that</u>	Taking account of TfL spatial planning position.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Proposed Modification	Reason for Modification
			<u>it is no longer operationally required, or a suitable replacement can be provided elsewhere. Development close to the rail station and rail infrastructure will need to take into account operational requirements and the potential need to provide mitigation for any impacts. Contributions will be sought towards potential capacity and/or step free access improvements at Alperton station that are likely to be needed to accommodate the cumulative impact of development related trips from this and other nearby sites in the Alperton Growth Area."</u>	
MM	BSWSA1	Planning considerations	~~"Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."~~	Placed in Infrastructure Requirements for consistency.
MM	BSWSA1	Infrastructure requirements	<u>"Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."</u>	Moved from planning considerations for consistency.
MM	BSWSA1	Justification	<u>"...as well as increasing provision of employment industrial floorspace in line with London Plan requirements...."</u>	Consistency with the London Plan.
MM	BSWSA2	Planning considerations	<u>"The use of Glacier Way as a TfL bus stand will also need be taken into account. This must be retained or enhanced as part of any development and early discussion with TfL London Buses on this is should take place."</u>	Taking account of TfL spatial planning advice.

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MM	BSWSA2	Planning considerations	~~"Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."~~	Placed in Infrastructure Requirements for consistency.
MM	BSWSA2	Infrastructure requirements	Amend policy to: <u>"No specific infrastructure requirements identified beyond Contributions will be sought towards potential capacity and/or step free access improvements at Alperton station that are likely to be needed to accommodate the cumulative impact of development related trips from this and other nearby sites in the Alperton Growth Area."</u>	Taking account of TfL spatial planning advice.
MM	BSWSA2	Infrastructure requirements	~~"Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."~~	Moved from planning considerations for consistency.
MM	BSWSA3	Planning considerations	<u>"Development close to the rail station and rail infrastructure will need to take into account operational requirements and the potential need to provide mitigation for any impacts."</u>	Taking account of TfL spatial planning advice.
MM	BSWSA3	Planning considerations	~~"Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."~~	Placed in Infrastructure Requirements for consistency.

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MM	BSWSA3	Infrastructure requirements	<u>"Contributions will be sought towards potential capacity and/or step free access improvements at Alperton station that are likely to be needed to accommodate the cumulative impact of development related trips from this and other nearby sites in the Alperton Growth Area."</u>	Taking account of TfL spatial planning advice.
MM	BSWSA3	Infrastructure requirements	<u>"Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."</u>	Moved from planning considerations for consistency.
MM	BSWSA4	Allocated use	"Mixed-use residential led development incorporating some replacement ~~workspace~~ <u>industrial</u> at ground floor level and potential commercial leisure use to take advantage of/ enhance the canal setting."	Consistency with the London Plan.
MM	BSWSA4	Planning considerations	"Given that the site is existing ~~employment~~ <u>industrial</u> land and Brent's status as a provide capacity borough, the council will require no net loss of ~~employment~~ <u>industrial</u> floorspace."	Consistency with the London Plan.
MM	BSWSA4	Planning considerations	~~"Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."~~	Placed in Infrastructure Requirements for consistency.
MM	BSWSA4	Planning considerations	<u>The site includes a West London Waste Plan protected site. This should be accommodated in the redevelopment, or suitable capacity for the waste function provided elsewhere.</u>	Reflects protected waste site need for re-provision.

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MM	BSWSA4	Infrastructure requirements	<u>"Contributions will be sought towards potential capacity and/or step free access improvements at Alperton station that are likely to be needed to accommodate the cumulative impact of development related trips from this and other nearby sites in the Alperton Growth Area."</u>	TfL Spatial Planning advice.
MM	BSWSA4	Infrastructure requirements	<u>"Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."</u>	Moved from planning considerations for consistency.
MM	BSWSA4	Justification	<u>"..The site's proximity to Alperton Station make it an excellent location for mixed residential and employment industrial use."</u>	Consistency with the London Plan.
MM	BSWSA5	Allocated use	"Mixed-use residential led development incorporating some replacement ~~employment~~ <u>industrial</u> space, small scale retailing / commercial leisure and community use (e.g. nursery)"	Consistency with the London Plan.
MM	BSWSA5	Indicative Capacity	~~"590 490"~~	Reduced due to need to provide more industrial space.
MM	BSWSA5	Timeline for delivery	0-5 years ~~"300 50"~~ 6-10 years ~~"290 400"~~ 10+ years <u>"50"</u>	Takes account of need to address different landownerships.
MM	BSWSA5	Planning considerations	"Given that the site is existing ~~employment~~ <u>industrial</u> land and Brent's status as a provide capacity borough, some re-provision of ~~employment~~ <u>industrial</u> floorspace..."	Consistency with the London Plan.

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MM	BSWSA5	Planning considerations	~~"Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."~~	Placed in Infrastructure Requirements for consistency.
MM	BSWSA5	Planning considerations	<u>"...A Thames Water Sewage Pumping Station is located within the proposed development boundary and this is contrary to best practice set out in Sewers for Adoption (7th edition). The development should make suitable arrangements to address this matter satisfactorily and dependent on solutions devised, future occupiers of the development should be made aware that they could periodically experience adverse amenity impacts from the pumping station in the form of odour; light; vibration and/or noise."</u>	Advice from Thames Water.
MM	BSWSA5	Infrastructure requirements	<u>"Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."</u>	Moved from planning considerations for consistency.
MM	BSWSA5	Infrastructure requirements	<u>"Contributions will be sought towards potential capacity and/or step free access improvements at Alperton station that are likely to be needed to accommodate the cumulative impact of development related trips from this and other nearby sites in the Alperton Growth Area."</u>	Taking account of TfL spatial planning advice.

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MM	BSWSA6	Allocated Use	"Mixed-use residential-led development incorporating ~~employment~~ <u>industrial</u> uses."	Align terminology with London Plan.
MM	BSWSA6	Indicative Capacity	" ~~135~~ <u>147</u> "	Takes account of further capacity assessment work.
MM	BSWSA6	Delivery timeline	0-5 years " ~~135~~ <u>43</u> " 6-10 years " <u>104</u> "	Takes account of further capacity assessment and timing.
MM	BSWSA6	Planning considerations	"Given that the site is existing ~~employment~~ <u>industrial</u> land and Brent's status as a provide capacity borough, no net loss and re-provision of ~~employment~~ <u>industrial</u> floorspace...."	Consistency with London Plan.
MM	BSWSA6	Planning considerations	~~"Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."~~	Placed in Infrastructure Requirements for consistency.
MM	BSWSA6	Infrastructure requirements	<u>"Contributions will be sought towards potential capacity and/or step free access improvements at Alperton station that are likely to be needed to accommodate the cumulative impact of development related trips from this and other nearby sites in the Alperton Growth Area."</u>	Advice from TfL Spatial Planning.
MM	BSWSA6	Infrastructure requirements	<u>"Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."</u>	Advice from Thames Water.
MM	BSWSA7	Existing Use	<u>"Mixed-use (Industrial with residential under construction)"</u>	Update in accordance with extant permission.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Proposed Modification	Reason for Modification
MM	BSWSA7	Indicative Capacity	" ~~2900~~ <u>3,030 new homes</u> "	Update in accordance with extant permission.
MM	BSWSA7	Site Description	"The majority of the site (with the exception of a small area at the north-west) was part of the Park Royal Strategic Industrial Location (SIL) ~~as designated by the London Plan~~ . The north-west part <u>was formerly</u> that is not SIL land is a non-designated Local Employment Site."	Update in accordance with extant permission.
MM	BSWSA7	Planning History	"Approved <u>hybrid planning permission application 18/0321</u> ~~is a hybrid application as amended by permission 19/2732~~ for the comprehensive mixed-use redevelopment of the <u>former Northfields Industrial Estate</u> . The scheme proposes demolition of all existing buildings on site and the delivery of a development including ~~2,900~~ <u>3030</u> homes..."	Update in accordance with extant permission.
MM	BSWSA7	Planning Considerations	Consistent with planning permission 18/0321 due to the site's historic SIL designation a minimum of 17,581 sq.m. of employment floorspace <u>of the typology and affordability associated with that planning permission</u> must be re-provided as part of the development. <u>Due to Brent's classification as a 'provide capacity' borough, should the opportunity arise, for example through co-location north of the river Brent or through intensification to the south, greater provision of industrial floorspace will be supported.</u>	The site through its planning permission 18/0321 consistent with Policy DMP14 was considered appropriate for release from SIL, on the basis that a minimum provision of employment space would be delivered as part of the development. The amended policy, together with BE2 and the policies map identifying SIL boundaries provides clarity that subject to a minimum amount of employment floorspace being re-

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Proposed Modification	Reason for Modification
				provided, the principle of the use of the site north of the river Brent for residential does not need to be re-tested against policies that would apply to SIL.
MM	BSWSA7	Planning considerations	~~"Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."~~	Placed in Infrastructure Requirements for consistency.
MM	BSWSA7	Design Principles	"The scale and massing should be sympathetic to existing heights in the surrounding context with lower building heights closer to Beresford Avenue. <u>Tall buildings are appropriate on this site consistent with the heights parameters established by planning permission 18/0321 (as amended by application 19/2732).</u> ..."	Update in accordance with extant permission.
MM	BSWSA7	Infrastructure requirements	<u>"Contributions to improve the bus network, Stonebridge Park station and surrounding walking/cycling routes to mitigate the impact of the development on the surrounding movement network."</u>	Advice from TfL Spatial Planning.
MM	BSWSA7	Infrastructure requirements	<u>"Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."</u>	Moved from planning considerations for consistency with other policies.
MM	BSWSA7	Justification.	BSWSA7 justification amend: "... ~~2900~~ <u>3030</u> homes...."	Update in accordance with extant permission.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Proposed Modification	Reason for Modification
			~~"....employment industrial..."~~	
MM	BSWSA8	Planning considerations	<u>"Development close to rail infrastructure will need to take into account operational requirements and the potential need to provide mitigation for any impacts."</u>	Advice from TfL Spatial Planning
MM	BSWSA8	Planning considerations	~~"Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."~~	Placed in Infrastructure Requirements for consistency
MM	BSWSA8	Infrastructure requirements	<u>"Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."</u>	Moved from planning considerations for consistency.
MM	BSWSA8	Infrastructure requirements	<u>"Contributions will be sought towards potential capacity and/or step free access improvements at Stonebridge Park station that are likely to be needed to accommodate the cumulative impact of development related trips from this and other nearby sites in the vicinity of the station."</u>	Advice from TfL Spatial Planning.
MM	BSWSA9	Planning considerations	~~"Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."~~	Placed in Infrastructure Requirements for consistency.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Proposed Modification	Reason for Modification
MM	BSWSA9	Infrastructure requirements	<u>"Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."</u>	Moved from planning considerations for consistency.
MM	BSWSA10	Planning Considerations	"...The loss of the garage means that employment use should be re-provided through a net increase in ~~employment~~ <u>industrial</u> floor space..."	Consistency with the London Plan.
MM	BSWSA10	Infrastructure requirements	<u>"Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."</u>	Thames Water advice.
MM	BSWSA12	Indicative Homes	" ~~24~~ <u>22</u> "	Reflects minded to approve scheme.
MM	BSWSA15	Indicative Homes	" ~~28~~ <u>36</u> "	Reflects minded to approve scheme.
MM	BSWSA16	Indicative Capacity	" ~~80~~ <u>120</u> "	Better reflects potential.
MM	BSWSA17	Indicative Capacity	" ~~150~~ <u>170</u> "	Reflects minded to approve scheme.
MM	Design	BD3	<u>"g) Be protected from sewer flooding by a suitable pumped device."</u>	Adapt to potential risk of basement flooding.
MM	Housing	BH1	Amend BH1 to "...to provide a minimum ~~27,482~~ <u>23,250</u> homes in the period 2019/20-2028/29. It will positively	Align with London Plan requirements in early

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Proposed Modification	Reason for Modification
			plan to promote a further minimum of ~~18,074~~ <u>21,595</u> homes from 2029/30 to the end of the Plan period in 2041....."	years and take account of updated trajectory.
MM	Housing	BH2	"...edge of town centre sites, <u>areas with higher levels of public transport accessibility levels</u> , and intensification..."	Align with London Plan.
MM	Housing	BH2	" <u>a) the site is allocated or has planning permission for an alternative use(s);</u> a) <u>b) there is no need for it or reasonable prospect of its use if provided; or</u> b) <u>c) in exceptional cases that its loss is outweighed by the benefits that its replacement with residential floorspace will bring.</u> "	Clarify status of existing permissions in relation to policy.
MM	Housing	BH3	" <u>The provision of Build to Rent development as defined within London Plan Policy H11 will be supported within Brent. To encourage...</u> "	Align policy with the London Plan.
MM	Housing	BH4	POLICY BH4 SMALL SITES AND SMALL HOUSING DEVELOPMENTS IN BRENT ~~Planning Permission for Small Sites will be determined in accordance with London Plan Policy H2A with the exception of:~~ ~~Criterion A2, which in Brent will only apply within PTAL 3-6 locations~~ <u>Small housing developments (below 0.25 hectares or 25 dwellings in size) delivering a net addition of self-contained dwellings through the more intensive and efficient use of sites, where consistent with other policies in the development plan, will be supported within the priority locations of PTAL 3-6, intensification corridors, or a town centre boundary through:</u> a) <u>the infill of vacant or underused brownfield sites,</u>	More detailed policy and policy justification given that policy H2A has been removed from the Intend to Publish version of the London Plan.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Proposed Modification	Reason for Modification
			b) <u>residential conversions, redevelopment, extensions of dwellings, or infill within the curtilage of a dwelling</u> c) <u>the redevelopment of flats, non-residential buildings and residential garages,</u> d) <u>upward extensions of flats and non-residential buildings</u> <u>In these priority locations, the character of the existing area will be subject to change over the Local Plan period.</u> <u>Outside the priority locations greater weight will be placed on the existing character of the area, access to public transport and a variety of social infrastructure easy accessible on foot when determining the intensity of development appropriate.</u> <u>Developments that demonstrably fail to optimise potential housing delivery on a site or prejudice more comprehensive development, particularly that of a site allocation, will be refused.</u> <u>All minor residential developments (less than 10 dwellings) are required to deliver an Urban Greening Factor of 0.4 on site.</u> ~~6.2.39 The London Plan sets ambitious targets for small site development across London on the basis of the content of Policy H2 Small Sites and Policy H2A Small Housing Developments. The council is positive about the extent to which small sites can contribute towards meeting housing needs. It anticipates delivery of about 370 dwellings per year. In relation to Policy H2 and Policy H2A the council has in the Local Plan identified town centre boundaries and main movement/ public transport corridors (known as intensification corridors) as principal areas where it considers the most obvious potential exists.~~ ~~6.2.40 As an outer London borough Brent has comparatively high car dependency rates for journeys,~~	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Proposed Modification	Reason for Modification
			particularly north of the North Circular Road. Some tube and railway stations are located in town centres, some however are not and otherwise have a poor level of access to viable public transport alternatives, employment and retail/ other facilities to meet every day needs away from the immediate vicinity of those stations. London Plan policy H2A's 800 metre buffer around town centres and underground/ railway stations also takes no account of the quality of the physical links to those centres or the quality of public transport service there. A large site development might be able to address these through contributions to improve links or public transport improvements/ contributions to provision of controlled parking zones. Small developments however usually are not subject to S106 and provide limited Community Infrastructure Levy funds which are therefore unlikely to be able to satisfactorily address such shortcomings. In addition, the percentage of residents that use the train/ underground as their main/ only mode of transport is very limited. 6.2.41 As such the council considers that London Plan Policy H2A needs some refinement to take account of Brent circumstances. In areas where small scale development is likely to encourage high levels of car dependency it could undermine other objectives, such as reducing travel by car, improving air quality, maintaining quality of life of existing residents and impacting business efficiency related to movement of goods. As such in Brent criterion A2 has been amended to only apply where there are genuine reasonable public transport alternatives that could realistically encourage people to not own/ use a car on a frequent basis. <u>6.2.39 The London Plan in Policy H2 Small Sites identifies that for London to deliver more of its housing; a substantial contribution from smaller sites below 0.25 hectares in size</u>	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Proposed Modification	Reason for Modification
			<u>will be required. It sets a minimum target of 4,330 for the period 2019/20 - 2028/29 from this source. Consistent with the London Plan, the Council wants to encourage the development of small sites and provide a positive environment for small site developments in areas with good access to public transport and local services.</u> <u>6.2.40 The policy identifies the types of the developments considered likely to be appropriate and the priority locations for these types of developments. The areas are likely to be some of the better served by public transport and thus more sustainable, in terms of reducing reliance on the private car with its associated impacts, such as air quality. The Council accepts that priority locations that are not identified as designated heritage assets or areas of distinctive residential character are likely to be subject to substantial change in character over the Plan period. Whilst character will change, the Council will still expect high quality development.</u> <u>6.2.41a Developments are likely to be within close proximity to existing homes. They should therefore be carefully and creatively designed, to avoid for example an unacceptable level of harm to neighbours' and occupants' amenity. Building design and the placement of windows and the use of landscaping can positively address privacy matters and ensure homes benefit from satisfactory levels of daylight and sunlight. In addition to design guidance for small housing sites that the Mayor will produce, the Council is also likely to adopt its own guidance to reflect Brent's characteristics.</u> <u>6.2.41b Although it is likely that opportunities will exist outside the priority locations for small sites development, the intensity of development allowed is likely to be less. This is likely to be as a result of the existing character of</u>	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Proposed Modification	Reason for Modification
			<u>those areas, which as they are not priority areas for development is not expected to significantly change. In addition the extent to which public transport and access to social facilities is within walking distance will also be considered. The poorer the access, the less intense the acceptable development is likely to be. In order to maximise the potential of all sites within the borough, small housing developments will not be acceptable where they fail to optimise potential housing delivery or prejudice the more comprehensive development of a wider site allocation.</u> <u>6.2.41c The open, green quality of the suburban environment was part of Brent's historical appeal. Over time, intensification of building coverage and hard landscaping, principally to accommodate cars, has reduced incidental green infrastructure. This has not only affected the visual quality of the environment, but has also bio-diversity, urban temperatures, air quality, and the volume and speed of surface water run-off, together with water quality. Small site development without some form of safeguards could well intensify these matters. Application of the urban greening factor to minor developments will assist in better addressing these matters, making up for the loss of green infrastructure where this might be lost, or supporting its re-introduction where sites may now have none. As such, delivery of green infrastructure on site consistent with an Urban Greening Factor of 0.4 will be sought on site with London Plan Policy G5 Urban Greening applying to minor developments (under 10 dwellings).</u> LONDON PLAN Policy H2 Small Sites Policy H2A Small Housing Developments Policy G5 Urban Greening Policy D7 Accessible Housing	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Proposed Modification	Reason for Modification
MM	Housing	BH5	"...in the period to 2041. <u>London Plan Policy H5 Threshold Approach to Applications will be applied.</u> The affordable housing..."	Improve clarity of alignment with London Plan.
MM	Housing	BH5	"Build to Rent developments, ~~a minimum of~~ 100 per cent at London Living Rent <u>equivalent rents or lower</u> ."	Improve policy clarity.
MM	Housing	BH8	"..benchmark housing provision ~~target figure~~ ..."	London Plan figures are a benchmark figure, not a target.
MM	Economy and Town Centres	BE1	".... <u>Further and higher educational provision</u> ~~quarters~~ at Northwick Park and Wembley will be protected and enhanced."	Provides greater clarity as final location of CNWL not yet known.
MM	Economy and Town Centres	BE2	"Within SIL and LSIS development will be supported where it intensifies ~~employment~~ <u>industrial</u> uses and accords with the principles as follows..." "Employment <u>Industrial Site</u> "	Align with London Plan policy.
MM	Economy and Town Centres	BE2	"..These sites will be protected for solely <u>industrial uses as defined in London Plan policy E4 Land for industry, logistics and services to support London's economic function</u> ~~Criterion A. employment uses within use class B1c, B2, B8 and closely related sui generis uses.~~ Development will be supported which increases the amount of ~~employment~~ <u>industrial</u> floorspace ~~in these use classes~~ , including start-up space, move on space. Any loss or reduction in floorspace will be resisted...."	Align with London Plan policy.
MM	Economy and Town Centres	BE2	".....A net increase in ~~employment~~ <u>industrial</u> floorspace; a mix of B1(b), B1(c), B2 and B8 ~~employment~~ floorspace will be...."	Align with London Plan policy.
MM	Economy and Town Centres	BE2	Northfields (<u>east and</u> west of Grand Union Canal)	Northfields east of the Grand Union Canal and

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Proposed Modification	Reason for Modification
				north of the River Brent is to be removed as a SIL designation on the policies map due to planning permission 18/0321. The remainder of the eastern site to the south of the River Brent is to be retained as SIL, which consistent with London Plan policy is regarded as appropriate for intensification.
MM	Economy and Town Centres	BE2	~~"Northfields (east of Grand Union Canal) SIL Co-location within site boundary of extant planning permission subject to as a minimum providing the amount, typology, and affordability of employment floorspace consistent with planning permission 18/0321. Intensification on the remainder of the SIL."~~	The principle of development of Northfields east of the Grand Union Canal and north of the river Brent for primarily residential purposes with some employment uses on site has been considered appropriate consistent with policy DMP14 in planning permission 18/0321. The site allocation BSWSA7 makes it clear that development of that site for residential is subject to a minimum amount of employment/ industrial floorspace being provided.
MM	Economy and Town Centres	BE3	<u>"The Council will require the retention of and where possible the intensification of Local Employment Sites in industrial</u>	Promote potential for intensification as a starting

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			<u>use.</u> The council will allow the ~~release~~ <u>development</u> of Local Employment Sites ~~to~~ <u>for</u> non-employment uses where: a) continued wholly employment use is unviable; or b) development increases the amount of <u>workspace as well as retaining the existing employment use or provides that additional workspace as</u> affordable workspace in the B use class, with makerspace in use class B1(c) prioritised to meet demand. <u>Where criterion a) is being used to justify the release, the maximum viable replacement of the existing employment floorspace will be sought.</u>	point, whilst emphasising potential for other uses if required.
MM	Green Infrastructure	BG11	"...Major <u>residential</u> developments outside Growth Areas will be expected to provide 0.81 sqm of public open space per resident in the following manner..."	Clarify relevant use as sought by DfE.
MM	Sustainable Infrastructure	BSUI3	"...surface water flooding. <u>Proposed development must pass the sequential and exceptions test as required by national policy.</u> The design and layout..."	Reference need for sequential test on flooding as sought by Environment Agency.
MM	Transport	BT2	"c))....in line with or exceeding <u>London Plan standards and TfL and WestTrans design standards...</u> "	In response to TfL, reference to London Plan.
MM	Transport	BT3	"Development that would generate significant movement of goods or materials, both during construction and in operation, should minimise the movement of goods and materials by road. <u>Freight consolidation through maximising the use of the capacity of vehicles entering and exiting a site and the use of more sustainable alternatives, i.e. by rail and canal, and pursuit of best practice in technical innovation to consolidate delivery and construction transport</u> is encouraged."	Reflects comments made by TfL Spatial Planning and OPDC.

Minor Modifications

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM	Introduction		<u>"There will be a need to consider updates to national and London level policy and guidance after the Brent Local Plan is adopted. These might be substantial material considerations that alter the weight that can be applied to policies in the Plan when determining planning applications. Reference to these will be made in the respective reports associated with the determination of planning applications"</u>	Requirement to consider updated policy at national or regional level once Local Plan has been adopted.
MiM	Introduction	Figure 3	Amend to provide greater clarity on tiers of planning policy.	Greater clarity
MiM	Introduction	2.4	<u>"..has have.."</u>	Grammar
MiM	Brent's Characteristics	3.17	<u>".....medium term. However, to support new residential development, current projections indicate a new primary school will be required in Wembley Park by 2023."</u>	Reflecting need for school on the York House site and timing.
MiM	Brent's Characteristics	3.19	In terms of indoor sports facilities, <u>the Council's Indoor Sports and Leisure Needs Assessment identified</u> provision is significantly below needs. Swimming pools are between $\frac{1}{4}$ - $\frac{1}{2}$ of the provision per head of population in adjacent boroughs. <u>There is also the need for additional sports halls. The Council's Playing Pitch assessment identified that for some sports, additional pitches are required.</u> This under provision is partly reflected by the levels of sports participation and physical activity across the borough.	Reference to evidence based documents as advised by Sport England.
MiM	Brent's Characteristics	3.28	Identify footnote 17 associated with the text "as with the provision of indoor facilities" Footnote 17 is <u>"Brent Council Indoor Sports and Leisure Facilities Needs Assessment November 2018"</u> Identify footnote 18 associated with the text "the provision of outdoor sports facilities" Footnote 18 is <u>"A</u>	Reference to evidence based documents as advised by Sport England.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<u>Strategic Approach to Playing Provision in Brent December 2016"</u>	
MiM	Brent's Characteristics	3.32	"...Its <u>will be used</u> as the boundary of the extended Ultra-Low Emissions Zone (UZEL) to be introduced in 2021 is ~~unclear in terms potential changes on these adverse impacts.~~ <u>Transport for London predict that the ULEZ 2021 will reduce air pollution in Brent by NO2 by 36%, with greater reductions within the ULEZ and lower reductions on and north of the North Circular.</u> "	More certainty on impacts has been identified by TfL.
MiM	Brent's Characteristics	3.33	Strategic transport improvements will occur adjacent to the borough at Old Oak with the provision of a HS2/ ~~Crossrail~~ <u>Elizabeth Line</u> interchange station (2026), a new station at Brent Cross West Thameslink (2023) and potentially the West London Orbital with ~~an~~ additional stations <u>at Harlesden and Neasden</u> (2026).	To reflect name change and potential additional stations.
MiM	Development Vision and Good Growth in Brent	How Will Good Growth be Delivered?	" <u>1</u> Strong and Inclusive Communities" " <u>2</u> Making the Best Use of Land" " <u>3</u> Creating a Healthy Borough" " <u>4</u> Growing a Good Economy" " <u>5</u> Increasing Efficiency and Resilience" " <u>6</u> Delivering the Homes to Meet Brent's Needs"	To provide clarity for referencing purposes.
MiM	Places	All figures "High Level Plan of the Place Vision"	Include town centre boundaries if this does not reduce the effectiveness of the drawing.	Increase mapped information.
MiM	Places	All figures "High Level Plan of the Place Vision"	Include Growth Area boundaries if this does not reduce the effectiveness of the drawing.	Increase mapped information.
MiM	Places	All figures "High Level Plan of the Place Vision"	Include some street names to assist with orientation.	Increase legibility.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM	Places	All figures “High Level Plan of the Place Vision”	"High Level Plan of the Place. <u>More detailed boundaries can be seen on the Policies Map</u> "	To make it clear that relevant policy designation boundaries can be more easily viewed on the policies map.
MiM	Central	5.1.22	"...whilst also incorporating more ~~employment~~ <u>industrial</u> floorspace now that Brent...."	To be consistent with London Plan policy.
MiM	Central	5.1.29	"...by incorporating ground floor ~~employment~~ <u>industrial</u> uses,"	To be consistent with London Plan policy.
MiM	Central	5.1.33	"...The provision of Boxpark, Troubadour theatre (<u>meanwhile uses</u>) plus the development of Plot W12"	Acknowledge meanwhile status.
MiM	Central	5.1.40	"Wembley Growth Area <u>is the Wembley Opportunity Area, as designated in the London Plan. Its designation as an Opportunity Area means that its growth is of strategic importance to the whole of London. It covers an extensive element of the ...</u> "	Acknowledge spatial designation in the London Plan.
MiM	East		All paragraphs should start 5.2 as opposed to 5.1 as this is chapter 5.2	Correction
MiM	East	5.2.10	" ~~Employment~~ <u>Industrial</u> space that meets 21 st century needs..."	To be consistent with London Plan policy.
MiM	East	5.2.16	"The proposed Growth Areas of Staples Corner and Neasden Stations will provide the opportunities for new mixed use communities with a significant amount of ~~employment~~ <u>industrial</u> and residential floorspace. A masterplanning exercise will be undertaken <u>involving key stakeholders, landowners and developers to help shape the masterplan from conception to completion. This will</u> ~~to~~ identify the appropriate mix of uses and form of	Clarify engagement in masterplanning process. Consistency with London Plan.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			development with a view to improving employment opportunities as well as homes.	
MiM	East	5.2.17	"...at a minimum replace, but ideally intensify ~~employment~~ <u>industrial</u> uses too...."	Consistency with the London Plan.
MiM	East	5.2.23	"....This will not be at the expense of ~~employment~~ <u>industrial</u> space...."	Consistency with the London Plan.
MiM	East	5.2.24	"....larger scale ~~employment~~ <u>industrial</u> uses with residential...."	Consistency with the London Plan.
MiM	East	5.2.25	"The Kingsbury ~~employment~~ <u>industrial</u> area retains principally clearly defined boundaries, with very little encroachment from non ~~employment~~ <u>industrial</u> uses. Exceptions have been the permitted development of office to residential which the council has now ceased through an Article 4 direction. The council will support the area's continued ~~employment~~ <u>industrial</u> use through encouraging investment only in ~~employment~~ <u>industrial</u> uses."	Consistency with the London Plan.
MiM	North	5.3.22	"...Intensification and co-location within the locally significant industrial sites in this place will create space that meets 21st century ~~employment~~ <u>industrial</u> needs and continue to provide good local employment opportunities....."	Consistency with the London Plan.
MiM	North	5.3.26	"...the intensification and co-location of ~~employment~~ <u>industrial</u> uses at the Queensbury LSIS and Morrisons sites....."	Consistency with the London Plan.
MiM	North	5.3.28	"...will need to address the requirement to intensify ~~employment~~ <u>industrial</u> uses too....."	Consistency with the London Plan.
MiM	North	5.3.29	"...will also support intensification of ~~employment~~ <u>industrial</u> space on the LSIS..."	Consistency with the London Plan.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			"...to achieve an increase in ~~employment~~ <u>industrial</u> floorspace and retention of a food store..."	
MiM	North	5.3.40	"...The redevelopment of these sites is expected to intensify ~~employment~~ <u>industrial</u> floorspace and ensure long term safeguarding for ~~employment~~ <u>industrial</u> uses....."	Consistency with the London Plan.
MiM	North	5.3.46	"...the Growth Area boundary has been extended. <u>This new boundary is considered to form an extension to the Burnt Oak and Colindale Opportunity Area boundary previously identified to be within Brent...</u> "	Clarify so that it is clear where London Plan opportunity area policies apply.
MiM	North	5.3.47	"An extensive area of Locally Significant Industrial Site off Capitol Way provides the opportunity to better meet Brent's longer term ~~employment~~ <u>industrial</u> needs through investment in new premises. Consistent with London Plan ~~employment~~ <u>industrial</u> land policies..."	Consistency with the London Plan.
MiM	North West	5.4.12	"...which makes it supportive of ~~employment~~ <u>industrial</u> activities."	Consistency with the London Plan.
MiM	North West	Opportunities	"Intensification of ~~employment~~ <u>industrial</u> uses at East Lane.."	Consistency with the London Plan.
MiM	North West	5.4.26	"East Lane SIL has a number of positive characteristics which in the context of London Plan policy make it a good candidate for further intensification for ~~employment~~ <u>industrial</u> uses."	Consistency with the London Plan.
MiM	South	5.5.6	"Locally Significant Industrial Sites in Church End contain low density ~~employment~~ <u>industrial</u> uses..."	Consistency with the London Plan.
MiM	South	5.5.30	"The regeneration of Old Oak, an existing industrial site to the south of Harlesden, is planned. It will deliver ~~24,000~~ <u>25,500</u> homes and ~~55,000~~ <u>65,000</u> new jobs	Change related to review of OPDC Local Plan following Car Giant

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			focussed around a new High Speed 2 and Elizabeth Line interchange <u>and intensification in Park Royal</u> ~~is to deliver a further 10,000 jobs and 1,500 homes~~ . The project is being led by the Old Oak Park Royal Development Corporation (OPDC). It will be important that the council continues to work with the OPDC <u>and Network Rail as the owners of the operational rail infrastructure, in addition to Transport for London, potential developers</u> and community groups. This is to ensure this significant regeneration project brings the highest number of benefits for Brent residents as possible. In particular, a key priority is to improve the connectivity between Old Oak and Harlesden ~~through, now likely to focus on Old Oak Lane, in addition to an enhanced Willesden Junction Station (including over-station development), and wayfinding.~~ This will better ensure local residents can benefit from job opportunities and new facilities and that Harlesden Town Centre is not adversely affected by a proposed major centre at Old Oak”	site change and request from TfL spatial planning.
MiM	South	5.5.32	“...There is an opportunity to extend the Growth Area boundary to include nearby low density ~~employment~~ <u>industrial</u> sites to promote investment in these areas. Church End Locally Significant Industrial Sites are low density ~~employment~~ <u>industrial</u> sites...” “..In advance of adoption of a Church End masterplan supplementary planning document which will seek comprehensive solutions for these ~~employment~~ <u>industrial</u> areas, small scale release of sites will be resisted.”	Consistency with the London Plan.
MiM	South	Chapter Heading	“SOUTH <u>PLACE</u> ”	Consistency in the document
MiM	South East	5.6.5	“Although there are no designated ~~employment~~ <u>industrial</u> sites here...”	Consistency with the London Plan.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			"Lonsdale Avenue <u>Road</u> "	Factual
MiM	South East	5.6.8	"The London Overground travels through this place <u>providing an orbital route linking Richmond/Clapham Junction and Stratford ...</u> "	Factual
MiM	South East	5.6.11	"...The proposed extension to the Mapesbury, <u>Kensal Green, Queen's Park, Brondesbury, Kilburn, and Willesden Green</u> conservation areas, <u>plus potential new ones for Kensal Rise, Kilburn Lane and Malvern Road</u> ~~boundary to include parts of Cricklewood Town Centre~~ reflects the distinct and special character of these areas as outlined in the Brent Heritage Study..."	Factual
MiM	South East	Following 5.6.7	"Although generally a relatively an affluent"	To correct typo
MiM	South East	5.6.22	"...Within this area there are no designated ~~employment~~ <u>industrial</u> sites here..."	Consistency with the London Plan.
MiM	South East	5.6.23	"In the Keep Britain <u>Tidy</u> qualitative study"	To correct
MiM	South East	5.6.24	" ~~Crossrail~~ <u>Elizabeth Line</u> "	To reflect name change
MiM	BSESA7	INFRASTRUCTURE REQUIREMENTS	"Thames Water will need to be engaged at the earliest opportunity to agree <u>a</u> drainage strategy"	To correct typo
MiM	BSESA13	RISKS	Amend to: "Need to decant existing residents. ~~Relocation of current residents and their opposing.~~ "	To correct typo and for consistency
MiM	BSESA18	ADDRESS	Amend to " ~~243~~ <u>245</u> -289...."	Correct address of allocation
MiM	BSESA18	DESIGN PRINCIPLES	"Development should respond to the height and proportions of adjoining 3 storey development and be of a quality which complements local character."	To correct typo

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM	BSESA20	JUSTIFICATION	"The Brent Retail & Leisure Needs Study identifies to continue this positive momentum ~~and~~ additional"	To correct typo
MiM	BSESA20		Add OS based map of site	To correct
MiM	BSESA21		Add OS based map of site	To correct
MiM	BSSA6	PLANNING HISTORY	Amend to: "Planning <u>committee has been minded to approve an</u> application to develop 130 residential units on Argenta House site. (18/4847)"	To reflect change in status of planning application
MiM	BSSA6	PLANNING CONSIDERATIONS	Amend to: "The site contains a light industrial units."	To correct typo
MiM	South West	5.7.11	'...Sudbury & Harrow <u>Road</u> rail station...'	Correct name
MiM	South West	5.7.22	"Alperton (South) LSIS land will be protected for solely ~~employment~~ <u>industrial</u> uses within use class B1c, B2, B8 and all closely related sui generis uses and where possible its use intensified."	Consistency with the London Plan.
MiM	South West	5.7.23	"Redevelopment of existing industrial floorspace and provision of new ~~employment~~ <u>industrial</u> floorspace in mixed-use development (co-location)....."	Consistency with the London Plan.
MiM	South West	5.7.31	"..The redevelopment of Northfields Grand Union which has commenced for approximately ~~2900~~ <u>3030</u> new homes plus employment land..."	Correct dwellings to reflect current planning permission.
MiM	South West	5.7.32	"..Taking account of much of its use as either Locally Significant Industrial Site, Local Employment Site and Strategic Industrial Land and Brent's provide capacity status for ~~employment~~ <u>industrial</u> land in the London Plan, a greater emphasis on ~~employment~~ <u>industrial</u> use in	Consistency with the London Plan.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			mixed use developments is now sought than was previously the case in allocations...”	
MiM	BSWA10		“ ~~BSWA10~~ <u>BSWSA10</u> ”	Correct reference
MiM	BSWSA10	Design Principles	“... ~~pubic~~ <u>public</u> space...”	To correct typo
MiM	Housing	6.2.12	“... ~~Whilst they do~~ <u>Where such accommodation is purpose built, well managed and high quality it provides a valuable role in meeting housing need and will be supported. However where this is not the case their concentration can sometimes have adverse impacts on neighbours. HMOs can also push up rents or inflate the price of properties for sale that would otherwise accommodate families.</u> ”	Provide clarity in certain situations as sought by Quintain.
MiM	Housing	6.2.16	“..benchmark ~~target~~ <u>figure</u> ...”	London Plan figures are a benchmark figure, not a target as identified by GLA.
MiM	Housing	After paragraph 6.2.27 under London Plan heading	“ ~~Policy H9 Vacant Building Credit~~ ”.	Policy removed from London Plan.
MiM	Housing	6.2.69	“...The landlords will be expected to register properties in conformity with the council’s licensing scheme. <u>In Build to Rent developments (as defined in the London Plan Policy H13) the Council is aware that operators may want to rent some self-contained properties to sharers and that it would be an unnecessary burden on both the Council and the developer to require planning permission for each change of use from self-contained dwelling to House in Multiple Occupation. As such the Council will seek to work with Build to Rent schemes to ensure that there is sufficient flexibility in planning permissions to ensure that</u>	To provide greater clarity on how Build to Rent schemes will be dealt with where properties are expected to be let to sharers.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<u>an agreed number of dwellings can be used as Houses in Multiple Occupation at any one time."</u>	
MiM	Housing	Add 6.2.78a	<u>"The inclusion of older people's housing will play a part in creating mixed and balanced communities. The Housing Learning and Improvement Network (Housing LIN) provides a good source of information on high quality and innovative housing solutions for an aging population. Guidance has been produced by HAPPI (Housing our Aging Population Panel for Innovation) that gives examples of how to design homes so that they better meet users' needs. It also shows how they can be positively integrated into places to encourage the benefits that interaction creates between occupiers of the dwellings and the wider community."</u>	Increased justification and guidance.
MiM	Housing	6.2.100	<u>"...meet residents' needs. Where not meeting the standards, developments will need to demonstrate how the level of amenity space provided is considered to be acceptable taking into account factors such as, accessibility of dwellings to their own amenity space and its quality, the amount and quality of communal space, proximity to other areas of open space nearby and internal amenity spaces. The calculation...."</u>	Build in policy flexibility.
MiM	Economy & Town Centres	6.4.9	"The London Plan identifies Brent as having potential to provide additional ~~employment~~ <u>industrial</u> floorspace capacity. To achieve this, there will be a need to make better use of industrial sites and secure additional ~~employment~~ <u>industrial</u> floorspace elsewhere. This will be through intensification of SIL and LSIS to increase plot ratio to a minimum of 0.65; seeking an increase in ~~employment~~ <u>industrial</u> floorspace on non-designated industrial sites; securing new ~~employment~~ <u>industrial</u> floorspace in Growth Areas and through the diversification of town centres."	Consistency with the London Plan.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM	Economy & Town Centres	Following 6.4.10	"London Plan E7 <u>Industrial</u> intensification, co-location and substitution"	Reflect Intend to Publish London Plan
MiM	Economy & Town Centres	Following 6.4.10	Place before SD8: "London Plan SD8 <u>7</u> Town Centres: Development principles and Development Plan Documents"	Reflect Intend to Publish London Plan
MiM	Economy & Town Centres	Following 6.4.10	"London Plan SD7 <u>8</u> Town centre network"	Reflect Intend to Publish London Plan
MiM	Economy & Town Centres	6.4.11	"...to provide additional ~~employment~~ <u>industrial</u> floorspace. All major developments exceeding 3000 sq.m in the Growth Areas outlined ~~above~~ <u>in policy BE1</u> should"	Consistency with the London Plan and for clarity
MiM	Economy & Town Centres	6.4.12	"If an operator is ..."	To correct typo
MiM	Economy & Town Centres	6.4.12	"The level of fit out of the workspace to a specification agreed with the Affordable Workspace ~~Provider~~ <u>Operator</u> and to ..."	To correct
MiM	Economy & Town Centres	6.4.15	~~"Major developments will be required to produce an~~ Employment, Apprenticeship and Training Plans <u>will be required</u> in line with ..."	To correct to reflect policy BE1 and for clarity
MiM	Economy and Town Centres	6.4.18	~~"...The West London Employment Land Review (WLELR) identified demand for an additional 0.6ha of industrial floorspace, primarily to meet projected demand for logistics. In addition to this, a number of sites within designated industrial sites are protected for waste purposes as identified in the West London Waste Plan and the policies map. The London Plan sets a higher waste target for Brent than previously which may mean additional sites for waste purposes will be required. Consistent with its 'provide capacity' status Brent the Council is committed to exceeding this figure deliver an~~ to increase in industrial floorspace to support growth in	Align with London Plan policy.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			business and employment."	
MiM	Economy and Town Centres	6.4.18	"...intensification of Park Royal which is being led by the OPDC. <u>The extent to which intensification and co-location will lead to an increase in industrial floorspace at this time is not known. Initial preliminary masterplan options work on Staples Corner in association with the GLA has shown addressing landownership and viability issues to incentivise and deliver additional floorspace is a complicated process. Nevertheless, the Council will undertake best endeavours to provide additional capacity, with a backstop position of not dropping below the 0.65 plot ratio within each defined industrial location.</u> "	Align with London Plan policy.
MiM	Economy & Town Centres	6.4.18	Amend to: "The West London Employment Land ~~Review Evidence (WLELR-WLELE)~~ "	To correct
MiM	Economy & Town Centres	6.4.19	~~"WLELR-WLELE"~~	To correct
MiM	Economy and Town Centres	6.4.20	"In calculating what constitutes the minimum floorspace requirement required in any site's redevelopment, the existing ~~employment~~ <u>industrial or warehousing</u> floorspace or a plot ratio of 0.65 will be applied, whichever is the higher..."	Align with London Plan policy.
MiM	Economy & Town Centres	6.4.21	"...closely related sui generis uses. <u>They can be sites wholly in employment use, or part of the floorspace or yardspace of a mixed use building or site. They make an important contribution to the local economy, by providing local employment opportunities and reducing the need to travel. This policy in recognition of the borough's provide capacity status seeks to support the retention and intensification of Local Employment Sites for continued industrial use, consistent with policy E7 of the London Plan. The policy...."</u>	To provide greater clarity/ consistency with London Plan on sites in industrial use.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM	Economy & Town Centres	6.4.22	"...with short term flexible leases appropriate for SMEs. <u>Where the Council accepts that a site is unviable for its retention for wholly employment purposes, it will seek the re-provision of maximum amount of employment space that is viable in any development proposal.</u> "	To clarify that employment floorspace provision will be sought where wholly employment use is unviable.
MiM	BE4		Formatting: "DIVERSITY OF USES" should not be the policy title but is a heading related to the policy wording below of: "No further...."	To correct
MiM	Economy & Town Centres	Following 6.4.61	"West London Employment Land ~~Review~~ <u>Evidence</u> -2019, GL Hearn"	To correct
MiM	Economy & Town Centres	Following 6.4.61	" ~~West London Affordable Workspace Study, 2019 Avison Young~~ "	To correct
MiM	Economy & Town Centres	Following 6.4.61	"Brent Industrial Land Audit and Intensification Analysis 2019, Brent Council"	To correct
MiM	Economy & Town Centres	6.4.30	"As referenced in the London Plan and Brent policy BHC4, the night time economies of Wembley has been identified as areas of National/ International importance, and those of Cricklewood, <u>Kilburn</u> and Wembley Park..."	To reflect London Plan.
MiM	Heritage and Culture	Title Page	" <u>6.5</u> ~~6-2~~ "	Correct chapter reference.
MiM	Heritage and Culture	6.5.18	"...Its archaeological discoveries <u>to date</u> are scarce; ..."	Acknowledge uncertainty.
MiM	Heritage and Culture	6.5.19	"...Policy ~~BD1~~ <u>BHC1</u> therefore..."	Reference correct policy.
MiM	Heritage and Culture	6.5.26	"...evaluation, <u>in order to assess the archaeological significance of the site and the scale of the archaeological impact from the proposed works.</u> <u>Applicants should consult with Historic England's Greater London Archaeological Advisory Service should take</u>	Improve guidance.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<u>place in order to determine the scope of the archaeological requirements."</u>	
MiM	Heritage and Culture	6.5.29 start of paragraph	<u>"17 views have been identified. Two views originate outside the area where the Council is Local Planning Authority. The Council has made OPDC and LB Ealing aware of each view's origins and it will be for them to determine the weight to give to the importance of the views when considering proposed development in their respective areas. London Plan...."</u>	Clarity of position in response to OPDC.
MiM	Green Infrastructure	6.6.10	<u>"Brent's existing blue infrastructure or Blue Ribbon Network, includes the ~~River~~ Lower Brent, Welsh Harp, Grand Union Canal - Paddington Arm, Wealdstone Brook, Brent Feeder Canal and Dollis Brook and Upper Brent."</u>	Provide clarity on named blue infrastructure as sought by Environment Agency.
MiM	Green Infrastructure	Evidence Base	<u>"Brent Biodiversity Action Plan 2007 OTHER GUIDANCE Biodiversity Metric 2.0. DEFRA/ Natural England Biodiversity net gain. Good Practice Principles for Development. A Practical Guide CIRIA/CIEEM/IEMA"</u>	Include more guidance as sought by Natural England/ Environment Agency.
MiM	Green Infrastructure	6.6.30a	<u>"The River Brent, which gives the borough its name, formed a natural division between Willesden and Wembley. The name 'Brent' is Old English, from Celtic words meaning 'sacred waters'. The River Brent is formed of a number of tributaries, which join and flow to the borough of Ealing. Despite much of it now being culverted, it is significant to Brent's history and culture. Just as important are the Grand Union Canal and Brent Feeder Canal which are completely artificial watercourses and important as historic transport infrastructure. By 1820 there was not enough water to supply the canal, so under an Act of Parliament in 1819, the Regent's Canal Company decided to dam the River</u>	To provide greater emphasis on watercourses with heritage value in response to Canals and Rivers Trust.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<u>Brent and create a reservoir, an artificial lake, in order to guarantee a sufficient water supply. These water landscapes are recognised as non-designated heritage assets for their historic significance to protect and enhance cultural and heritage value to Brent. Equally, so is the protection, promotion and enhancement of their curtilage, which impact on the setting of these heritage assets.</u> “	
MiM	Green Infrastructure	6.6.31	“ <u>Canal Cottage, Twyford Abbey Road (now in OPDC area) and Reservoir Cottage, in Birchen Grove, are locally listed but much of the twentieth-century development and canal heritage is not protected, and in particular, deserves better recognition. For example, the canal is supported by two aqueducts, one as it passes over the River Brent, the Twyford Aqueduct and the other over the North Circular Road (A406). Other historic features of the canal include a WWII concrete pillbox, bridges and concrete drainage mechanisms. The appropriate.....</u> ”	Identification of heritage assets in response to Canals and Rivers Trust.
MiM	Green Infrastructure	6.6.34	“The Water Framework Directive is a European Union Directive which commits all member states <u>are required</u> to achieve ~~achieving~~ a ‘good’ status’ or ‘good ecological’ status by 2021, or if an extension is granted, then ~~for all water bodies by 2027.~~ ”	Strengthen and improve clarity as sought by Environment Agency
MiM	Green Infrastructure	6.6.35	“In Brent <u>all</u> waterside developments and other developments...”	Strengthen.
MiM	Green Infrastructure	6.6.36	~~“6.6.36 a)~~ and remainder of bullets subsequent and paragraph numbers.	Correct.
MiM	Sustainable Infrastructure	6.7.5	“...as well as devastating environmental impacts. <u>Brent is susceptible to flooding from different sources.</u> Fortunately, over the last twenty years, Brent has not	Reference types of flooding as sought by Environment Agency.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			experienced major flooding <u>from its brooks and rivers</u> , with the most recent events..."	
MiM	Sustainable Infrastructure	6.7.9	"The Council made its "climate and ecological emergency" declaration in July 2019, promising to aim for carbon neutrality by 2030. It will be delivering a new climate strategy in 2020, which will provide greater clarity on the actions that will be taken in Brent to address <u>climate change</u> . In terms of clean generation....."	To identify added priority given to climate change by the Council in 2019.
MiM	Sustainable Infrastructure	6.7.35	"...subject to periodic review. <u>6.7.35a In exceptional circumstances and consistent with national policy outputs there may be occasions where development in the functional floodplain is required. For the most part this is likely to be only for water compatible uses. Nevertheless, due to development that has occurred in Brent in what would otherwise have been functional floodplain, there may be exceptional circumstances where it is appropriate for small incursions into the functional floodplain to be considered acceptable in principle if it has other significant benefits in relation to watercourse environment or risk of flooding. Examples could be returning a larger area to functional floodplain, or reducing the likelihood of impediments to river flow that might currently exist, such as stilts holding up buildings over a watercourse. Where any intervention that is defined as development in the functional floodplain occurs, the council will also seek the opportunity to improve through that development the environmental quality of the watercourse.</u> "	Supporting text for development on floodplain to clarify following representation from Environment Agency.
MiM	Transport	6.8.6	" <u>Crossrail Elizabeth Line, Great Western Mainline</u> and High Speed 2 stations)..."	To reflect name change and acknowledge other lines that will be connected to.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM	Transport	6.8.6	"....A pedestrian route over the A5 is needed to connect Brent Cross West station to Staples Corner. <u>The precise location of the WLO stations will be firmed up as the project progresses. When there is more certainty on their location more detailed work can be done on improving their connectivity to surrounding areas.</u> To the south....."	Reflects circumstances.
MiM	Transport	6.8.14	"This includes mitigation on smalls scale schemes"	To correct typo
MiM	Transport	6.8.16	"The requirements for electric charging points and cycle parking are set out in London Plan policy <u>T5 and T6- T6.1.</u> "	To correct referencing as sought by TfL Spatial Planning.
MiM	Transport	Figure 38	Colourwash the OPDC area and include on the key. Provide higher definition Figure Map	To provide clarity on OPDC and LB Brent local planning authority areas
MiM	Delivery and Monitoring	7.1.6	"...thorough cross ~~subsidisation~~ <u>subsidy</u> on development "..arm's length delivery vehicle (<u>company name: i4B</u>) in assisting .."	Grammar and supplementary information.
MiM	Delivery and Monitoring	7.1.8	"...on-going funding..."	Correct spelling
MiM	Delivery and Monitoring	7.1.15	"...additional premises. <u>There is the potential for expansion of healthcare provision in the Brent area to support growth in adjacent communities and vice versa. The Council and the Brent CCG will work with adjoining boroughs (and OPDC) and relevant CCGs to ensure suitable and timely provision of necessary facilities.</u> "	Acknowledge cross-boundary working/ provision as identified by OPDC.
MiM	Delivery and Monitoring	7.1.18	"..open space ~~are~~ <u>is</u> the Brent River Park" "...different ways of ~~trying~~ seeking to support...."	Grammar corrections.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification												
MiM	Delivery and Monitoring	Figure 39 new first and second measures:	"Proportion of Brent Local Super Output Areas in the <u>bottom 20% of most deprived areas nationally as identified in the Indices of Multiple Deprivation.</u> " Target " <u>15% 2031</u> " Specific Policy to be monitored " <u>Development Vision</u> " Performance Measure " <u>Proportion of the top 20% least deprived areas nationally as identified in the Indices of Multiple Deprivation.</u> " Target " <u>2% 2031</u> " Specific Policy to be monitored " <u>Development Vision</u> "	Improve monitoring of policy outcomes.												
MiM	Delivery and Monitoring	Figure 39	"Performance Measure <u>Number of homes built on small sites.</u> Target <u>433 dwellings.</u> Specific policy to be monitored BH4 "	Create target for monitoring.												
MiM	Appendix 1		8.1.1 ~~Once adopted, the~~ <u>The</u> policies in this version of the Local Plan will replace ~~the majority of all policies~~ within the Local Plan documents identified above. A ~~small number of policies in the Brent Development Management Policies Plan will be taken forward unchanged with the exception of their policy number.~~ <table><thead><tr><th>Policy Reference</th><th>Status</th></tr></thead><tbody><tr><td>~~DMP1, DMP2, DMP3, MP4, DMP 6, DMP 8, DMP 9, DMP9a, DMP9b, DMP10, DMP11, DMP12, DMP13, DMP14, DMP15, DMP16, DMP17, DMP18, DMP19 and DMP20~~ <u>All policies</u></td><td>Superseded</td></tr><tr><td>DMP4a</td><td>Now referenced BE7</td></tr><tr><td>DMP5</td><td>Now referenced BE8</td></tr><tr><td>DMP7</td><td>Now referenced BHC1</td></tr><tr><td>DMP21</td><td>Now referenced BHC5</td></tr></tbody></table>	Policy Reference	Status	~~DMP1, DMP2, DMP3, MP4, DMP 6, DMP 8, DMP 9, DMP9a, DMP9b, DMP10, DMP11, DMP12, DMP13, DMP14, DMP15, DMP16, DMP17, DMP18, DMP19 and DMP20~~ <u>All policies</u>	Superseded	DMP4a	Now referenced BE7	DMP5	Now referenced BE8	DMP7	Now referenced BHC1	DMP21	Now referenced BHC5	To reflect fact that the draft Local Plan has amended policies which it previously considered did not need updating and which are therefore going to be superseded.
Policy Reference	Status															
~~DMP1, DMP2, DMP3, MP4, DMP 6, DMP 8, DMP 9, DMP9a, DMP9b, DMP10, DMP11, DMP12, DMP13, DMP14, DMP15, DMP16, DMP17, DMP18, DMP19 and DMP20~~ <u>All policies</u>	Superseded															
DMP4a	Now referenced BE7															
DMP5	Now referenced BE8															
DMP7	Now referenced BHC1															
DMP21	Now referenced BHC5															

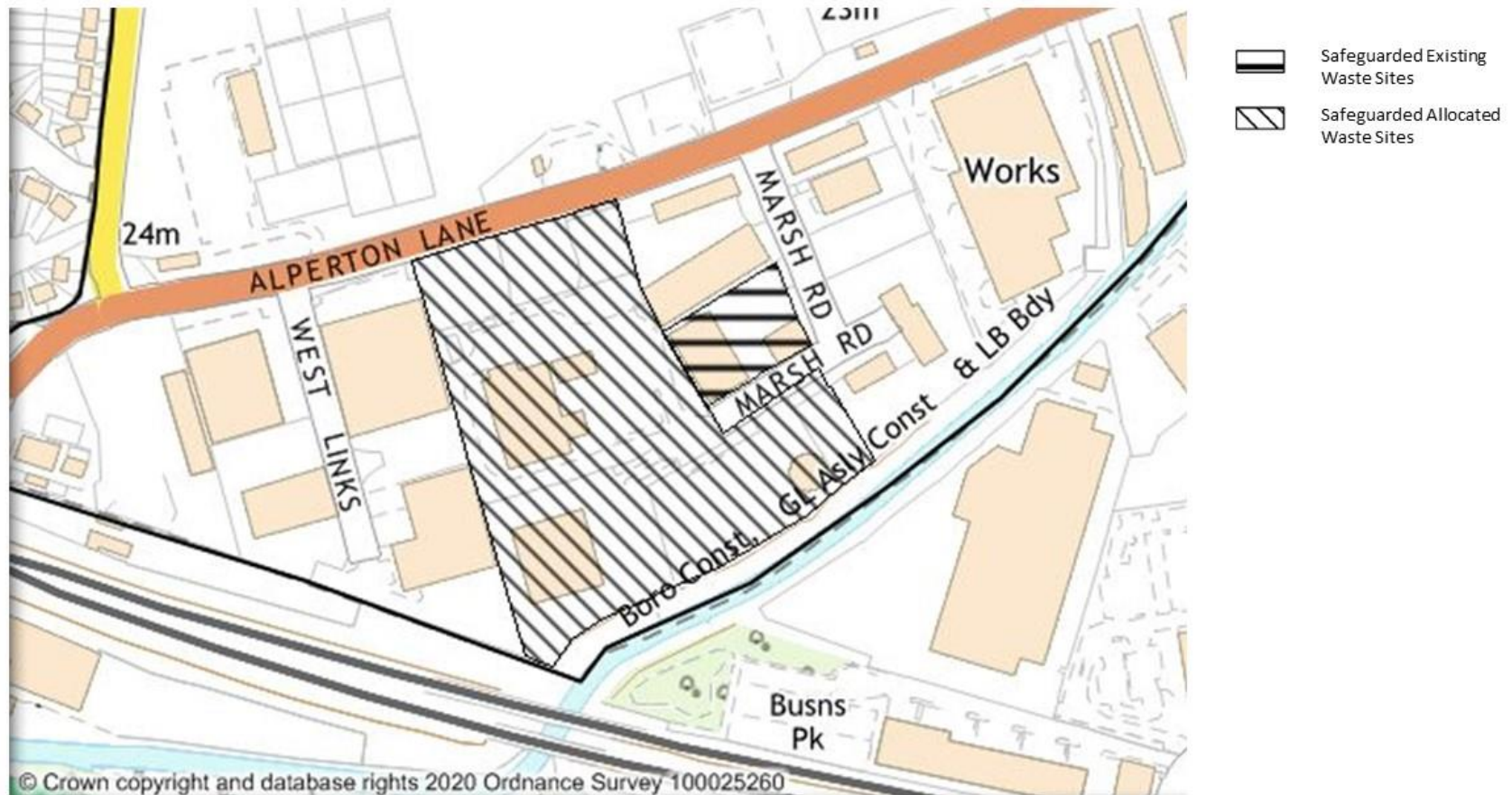
Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM	Appendix 4	8.4.5 c)	"one coach parking space should be provided for every 50 75 bedrooms".	Correction
MiM	Appendix 5		<u>"BRENT NON RESIDENTIAL PREMISES SERVICING STANDARDS AS REQUIRED IN ASSOCIATION WITH POLICY BT3 'FREIGHT AND SERVICING, PROVISION AND PROTECTION OF FREIGHT FACILITIES'."</u>	Provides greater clarity on link between Appendix 5 and the Policy BT3.
MiM	Appendix 6	Non-strategic policies	"..BESA4,..."	No Policy BESA4 is in the Local Plan
MiM	Glossary	Add	<u>"Intensification Corridor: Principal movement corridors such as main roads, with good access to public transport where it is considered that higher density development/ buildings around 5 storeys are likely to be appropriate."</u>	Provides clarity on term.
MiM	Glossary	Locally Significant Industrial Sites (LSIS)	<u>"Employment Industrial sites identified in the Core Strategy Local Plan as being of significance to Brent's economy."</u>	Consistency with London Plan and update which Plan it is identified.
MiM	Figures	Throughout	Include railway lines/ stations on all appropriate maps within the Plan	To provide clarity on rail infrastructure.

Modifications to the Policies Map

Policy Map Change	Chapter	Policy	Modification Proposed	Reason for Modification
Map Mod 1-5	None	None	Identify safeguarded waste sites as set out in the West London Waste Plan	To provide clarity on sites that have associated policies in the West London Waste Plan
Map Mod 6	Central	BCGA1	Identify Wembley Growth Area/Opportunity Area with a boundary consistent with the Wembley Growth Area.	Provide clarity on Wembley Opportunity Area for associated London Plan policies.

Policy Map Change	Chapter	Policy	Modification Proposed	Reason for Modification
Map Mod 7	North	BNGA1	Identify Burnt Oak Colindale Growth Area/Opportunity Area with a boundary consistent with the Burnt Oak Colindale Growth Area.	Provide clarity on Burnt Oak Colindale Opportunity Area for associated London Plan policies.
Map Mod 8	Design	BD2	Amend the policies map to include the Northfields development site within the Tall Buildings Zone. Update the associated Tall Buildings Strategy to reflect this change.	Ensure that the Zone and policy is reflective of an extant planning permission that incorporates tall buildings.
Map Mod 9	Design	BD2	Amend the map in the Tall Buildings Strategy and Policies Map to show the Tall Buildings Zone Core in Zone C of the Colindale Tall Buildings Zone extending to the edge of the main building line along Edgware Road so that it is consistent with the text in paragraph 8.51 of the Tall Buildings Strategy.	Improve Plan consistency.
Map Mod 10	Design	BD2	Remove from the Planning Policies Map Key: "Pinnacle" associated with the Tall Buildings Zones.	Remove old terminology.
Map Mod 11	Design	BD2	Add appropriate building heights for the Tall Buildings Zones on the interactive map consistent with the Tall Buildings Strategy.	To provide information that will support the policy.
Map Mod 12	Economy & Town Centres	BE2	Amend boundary of Northfields SIL to take account of planning permission 18/0321 where the principle of the loss of the site to predominantly residential development has been approved.	To provide clarity regarding the status of the site to no longer be considered as a Strategic Industrial Location.

Map Mod 1 Brent Draft Local Plan Submission Version West London Waste Plan Boundaries – Alperton Lane



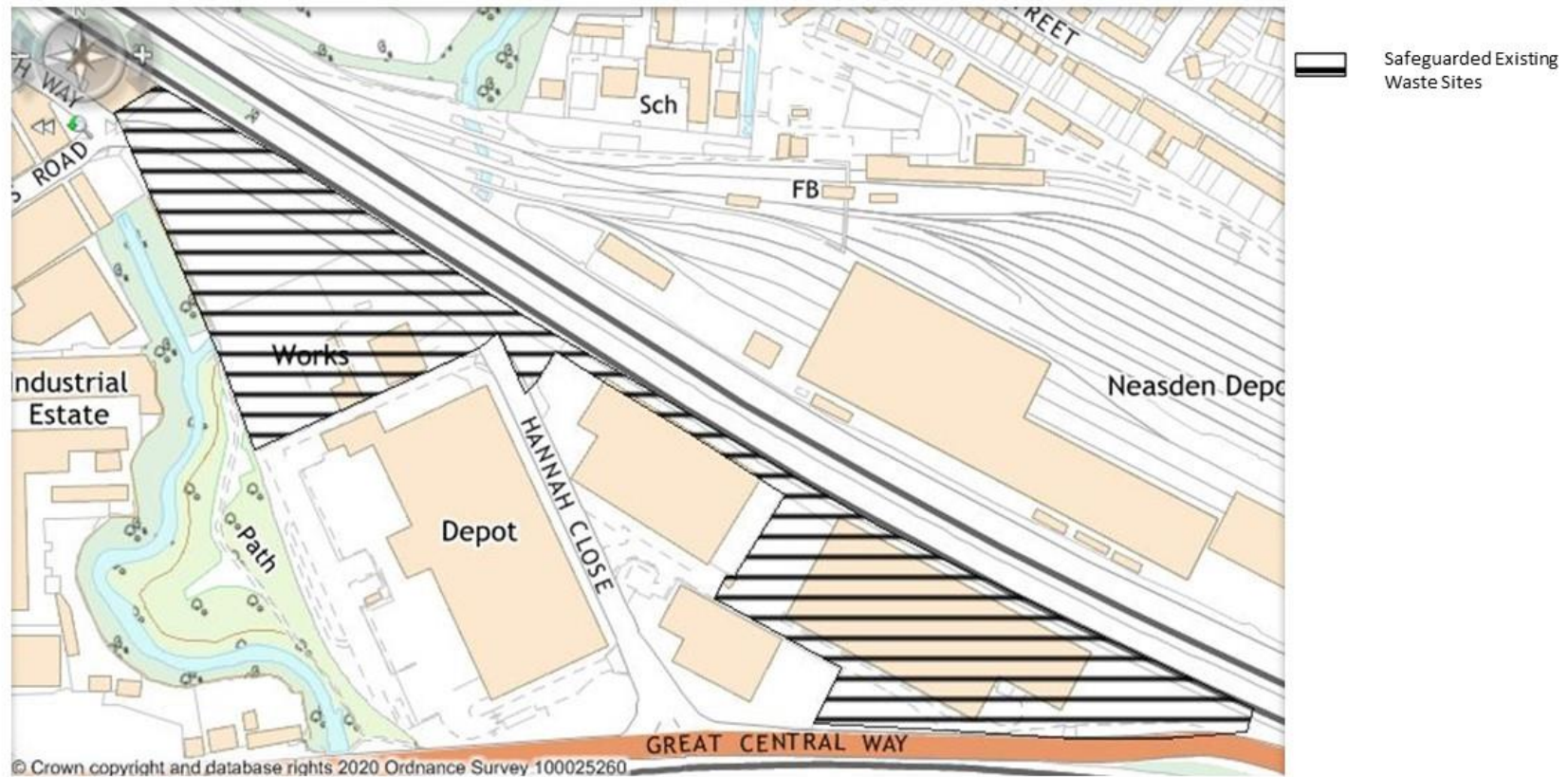
Map Mod 2 Brent Draft Local Plan Submission Version West London Waste Plan Boundaries – Mount Pleasant



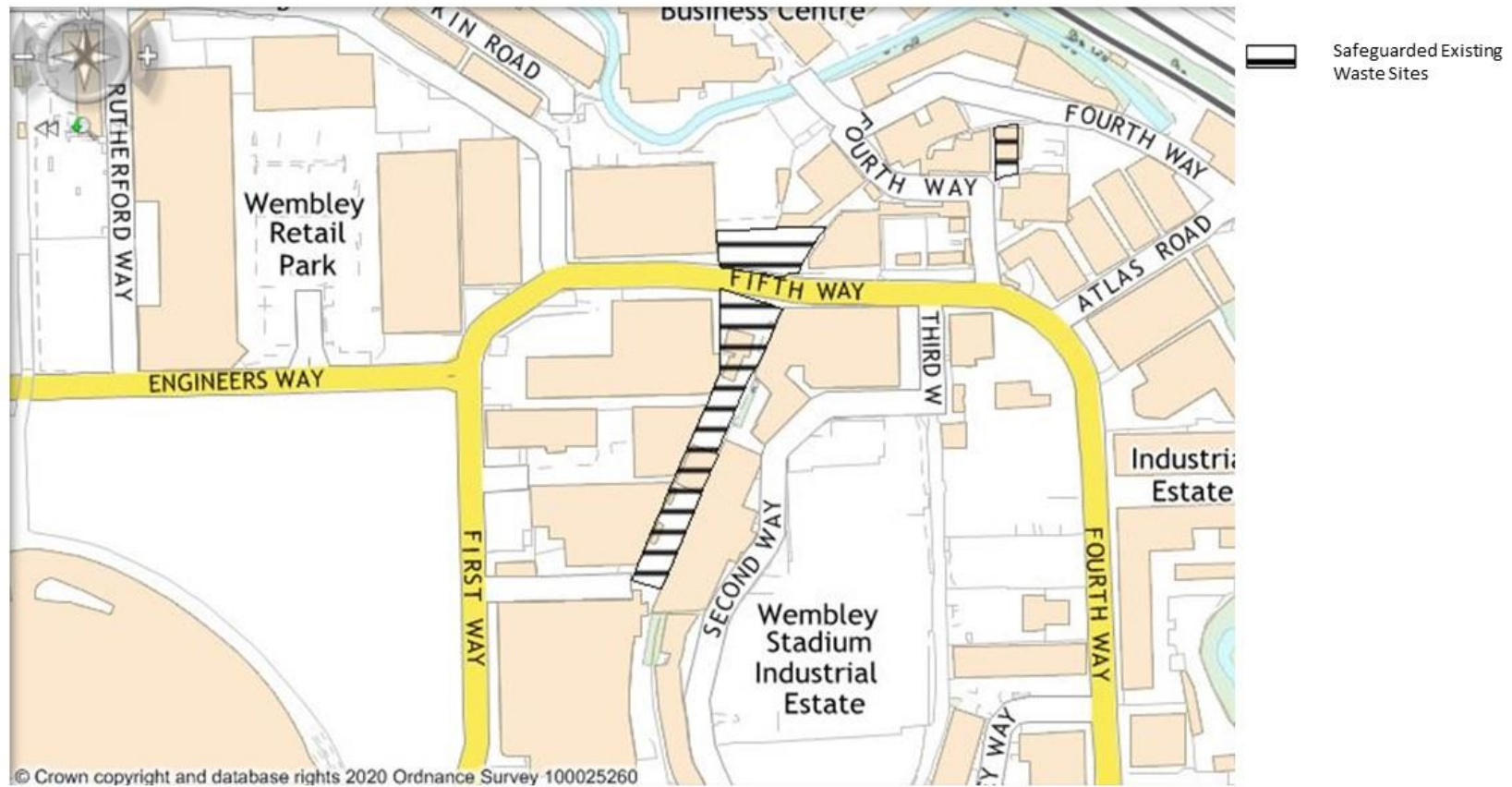
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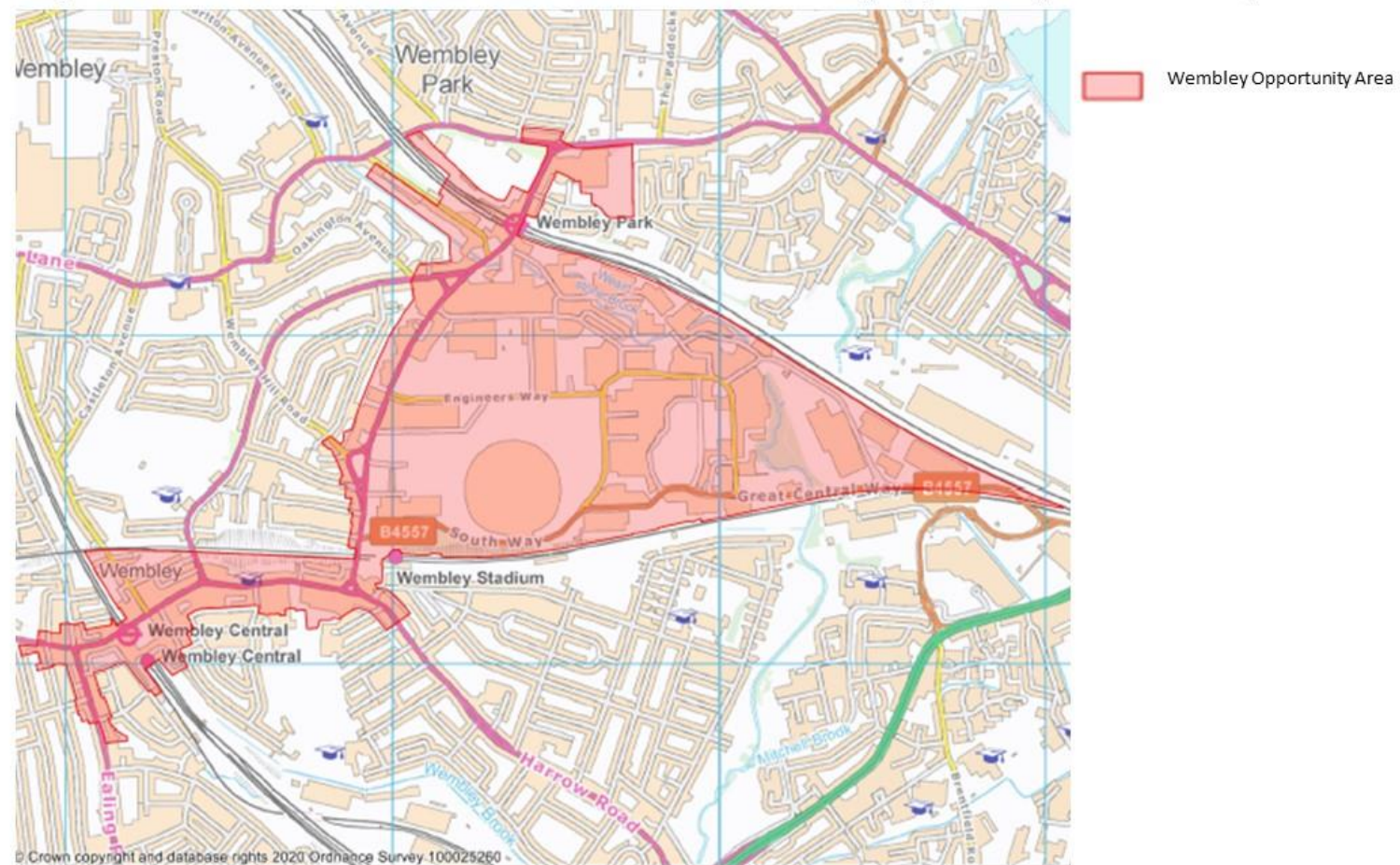
Map Mod 4 Brent Draft Local Plan Submission Version West London Waste Plan Boundaries – Wembley Hannah Close



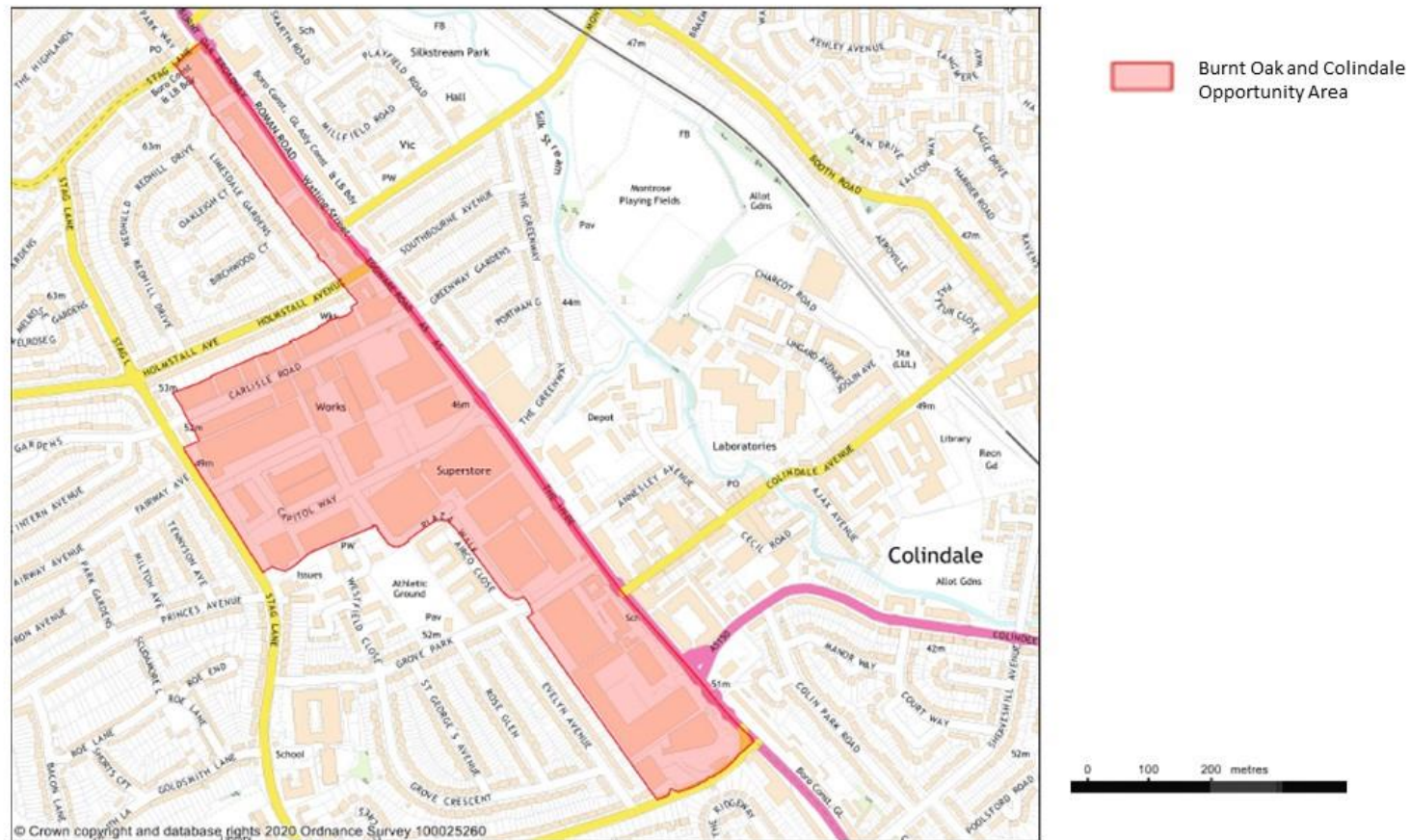
Map Mod 5 Brent Draft Local Plan Submission Version West London Waste Plan Boundaries – Wembley Fourth & Fifth



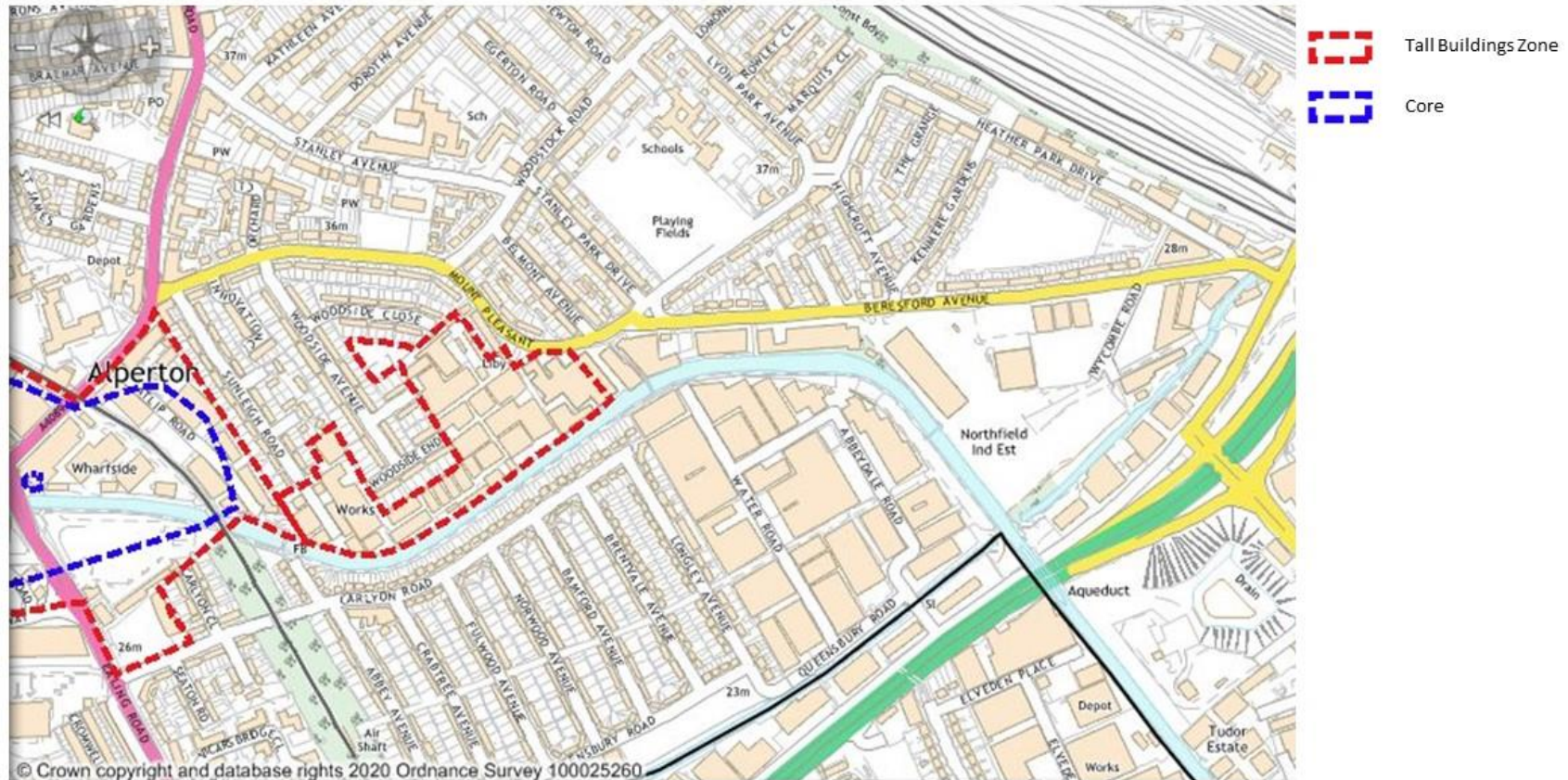
Map Mod 6 Brent Draft Local Plan Submission Version Wembley Opportunity Area Boundary



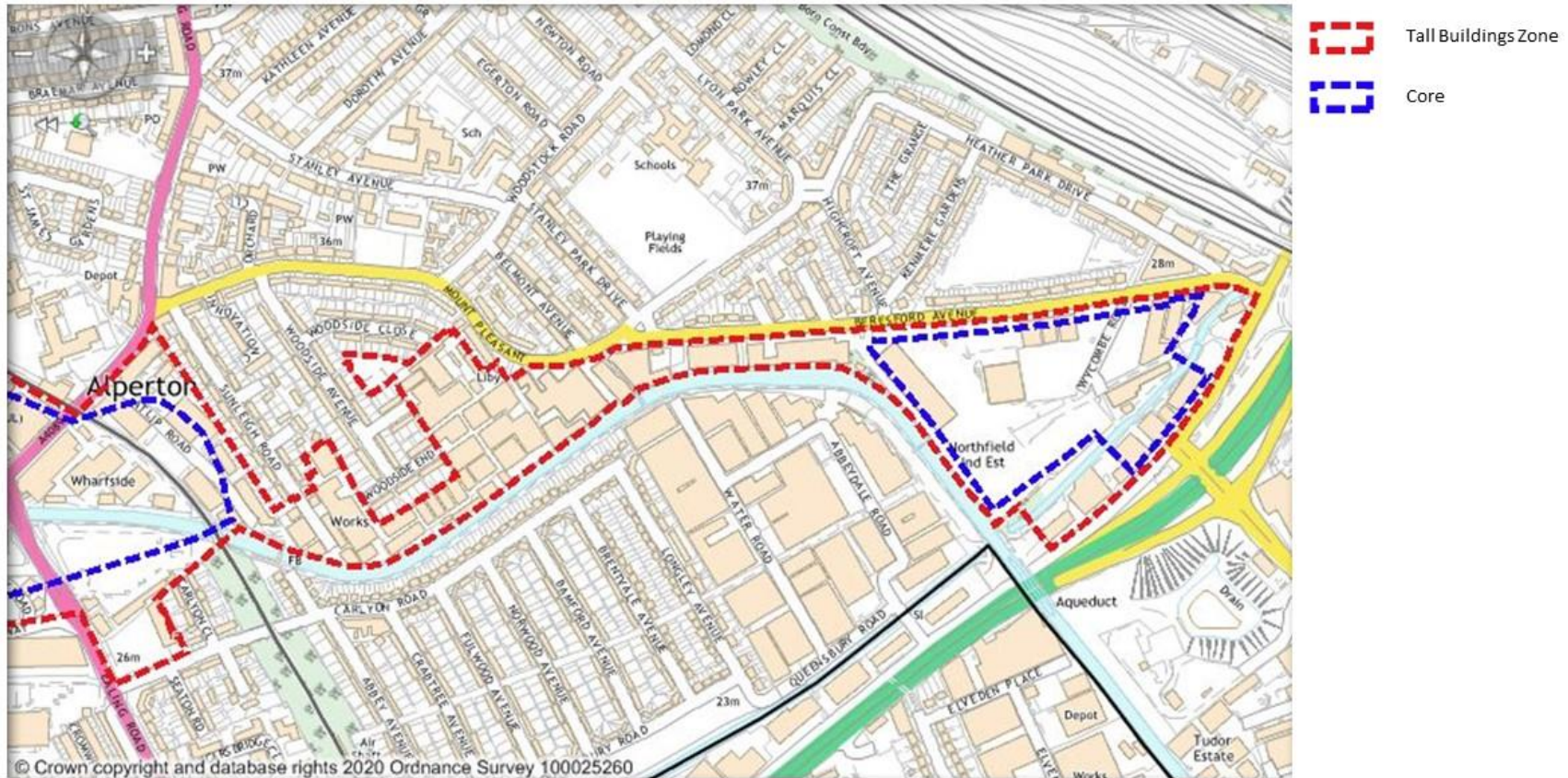
Map Mod 7 Brent Draft Local Plan Submission Version Burnt Oak and Colindale Opportunity Area Boundary



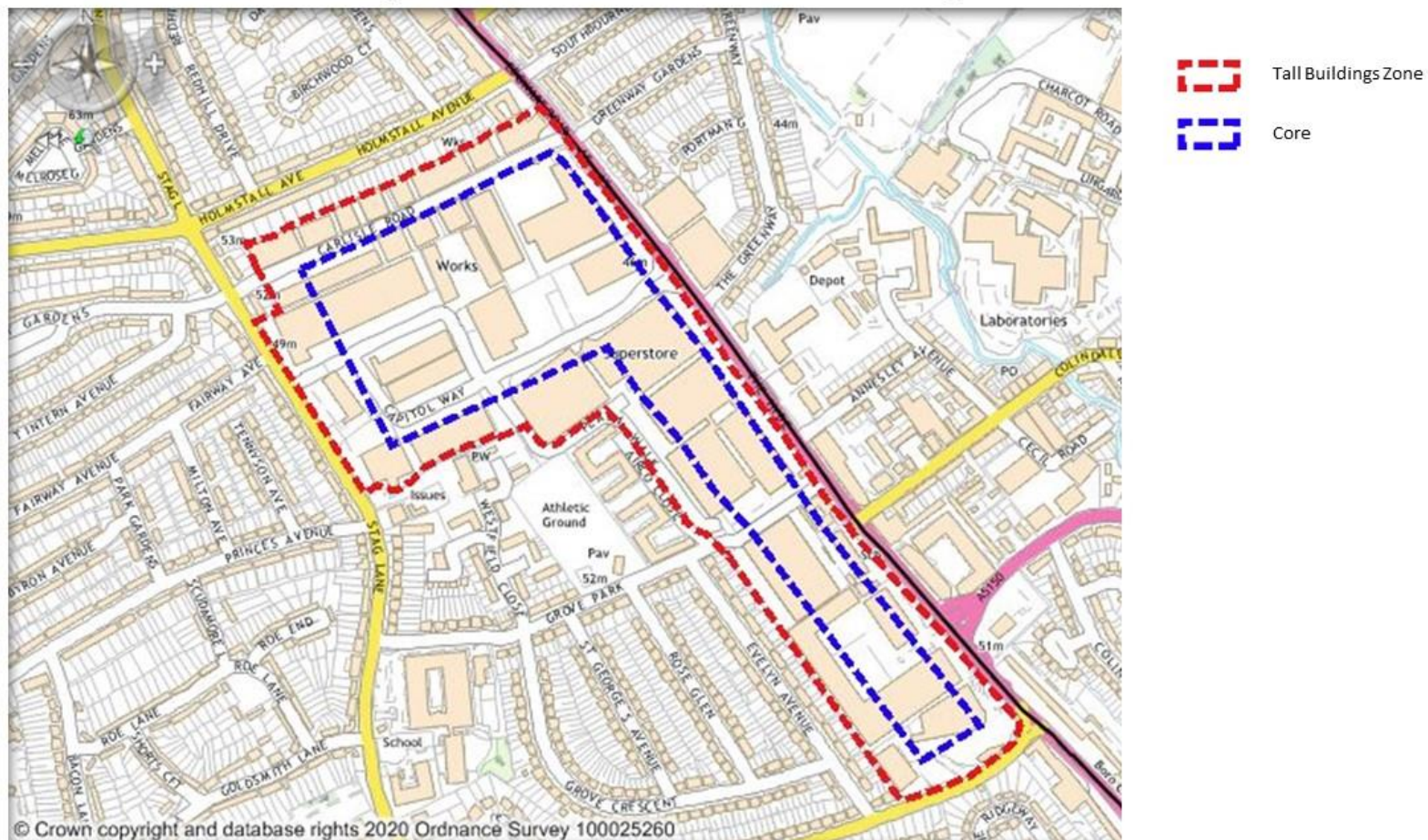
Brent Draft Local Plan Regulation 19 Publication Version Tall Buildings Zone Alperton Eastern Boundary



Map Mod 8 Brent Draft Local Plan Submission Version Tall Buildings Zone Alperton Extended Eastwards To Include Northfields



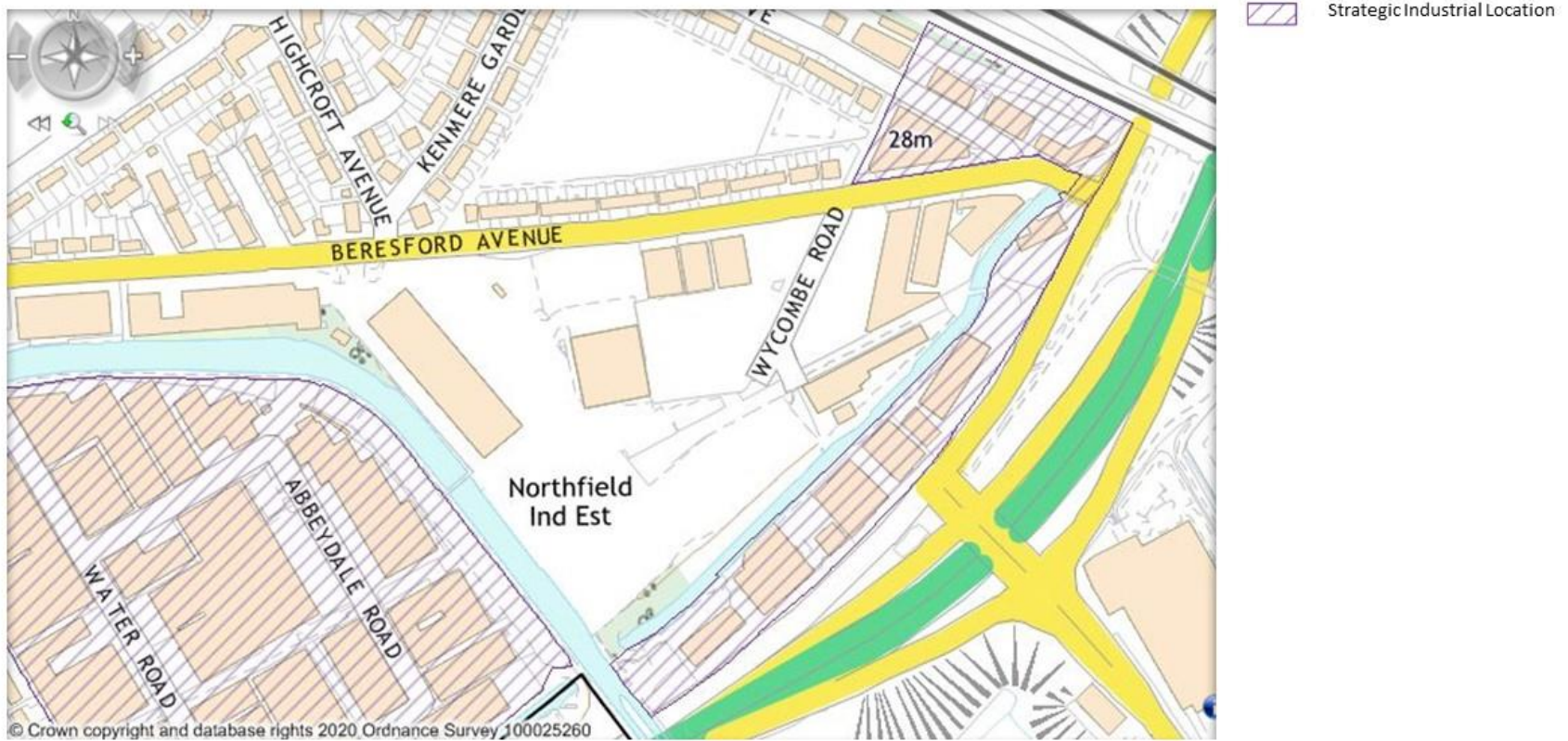
Brent Draft Local Plan Regulation 19 Publication Version Tall Buildings Zone Colindale



Page 854



Map Mod 12 Brent Draft Local Plan Regulation Submission Version Strategic Industrial Location Boundary – Removal of Northfields Where Principle of Residential Has Been Accepted Through Planning Permission 18/0321.



Other modifications to Local Plan supporting documents

	Infrastructure Delivery Plan	Transport, Roads.	Identify any highway schemes related to the M1 that become evident as the evidence base for the London Plan further addresses transportation impacts with inputs from Highways England.	Include information.
	Infrastructure Delivery Plan		Update schedule to include additional infrastructure required prior to adoption of the Plan and for the infrastructure delivery plan to be updated on an on-going basis.	Reflects dynamic nature of the document.
	Historic Environment Placemaking Strategy	Page 24	"....perhaps galvanised by residents' associations, <u>Local History Societies</u> or a neighbourhood..."	Reflects role societies have.
	Historic Environment Placemaking Strategy	Page 25	Objective 3: Work with communities, <u>Local History Societies</u> and residents' associations to thematically identify potential candidates for the Local List, based on the Borough selection criteria.	Reflects role societies have.
	Historic Environment Placemaking Strategy	Page 28 photograph adjacent to 9.11	"3 and 4 <u>5</u> Buck Lane...."	Accuracy
	Historic Environment Placemaking Strategy	Page 36	"Iron age pottery found in 2013 on the site <u>of the former "Blackbirds" public house, underneath the Lidl supermarket</u> Blackbird Hill, Wembley"	Accuracy
	Historic Environment Placemaking Strategy	Page 41	Objective 3: Work with communities, <u>Local History Societies</u> and residents' associations to thematically identify potential candidates for the Local List, based on the Borough selection criteria.	Reflects role societies have.

Appendix 5



**Local Plan Integrated Impact Assessment (IIA)
February 2020**

Contents

Local Plan Integrated Impact Assessment (IIA)	
1. Introduction	7
2. Brent's Local Plan	15
3. Methodology	17
4. Sustainability Context	39
5. Draft Local Plan Vision and Objectives	71
6. Publication Stage Policies and Reasonable Alternatives Appraisal	81
Design	81
Housing	97
Social Infrastructure and Community Facilities	147
Economy and Town Centres	149
Green Infrastructure	190
Sustainable Infrastructure	200
Transport	209
7. Publication Stage Site Allocations Appraisal	224
8. Submission Stage Local Plan Policies	225
IIA scoring and appraisal changes as a result of Major Modifications	225
Updated Policy Assessments	228
9. Submission Stage Site Allocation Assessments	241
Potential Changes to Site Allocation Assessments due to Main Modifications	241
Proposed Change to Methodology for Assessing Flood Risk	244

Proposed Changes to Flood Risk Ratings of Site Allocations	246
Central	249
North268	276
North West	279
South	295
South East	322
South West	338
Appendix 1 - Baseline Information	338
1. Population and Equality	338
2. Education	347
3. Health and Well-Being	354
4. Crime	359
5. Water	364
6. Air Quality.....	372
7. Soils and Geology.....	373
8. Climate Change	375
9. Biodiversity, Flora and Fauna	382
10. Heritage Assets (Architectural and Archaeological)	385
11. Landscape and Townscape.....	395
12. Waste	399
13. Transportation.....	401
14. Noise.....	409
15. Local Economy	410
16. Deprivation	417

17. Housing	422
Appendix 2 – Relevant Plans, Programmes and Policies	432
Appendix 3 - Habitat Regulation Assessment	511

Tables

Table 1: European Sites identified within the Screening Assessment.....	12
Table 2: IIA Framework.....	31
Table 3: Scoring for the IIA.....	32
Table 4: Relevant Plans, Policies and Programmes	50
Table 6: Baseline Information	70
Table 7: Ward Populations	339
Table 8: Summary of Brent's Education Provision.....	347
Table 9: Status of Brent's waterbodies	366
Table 10: Listed Buildings/ Structures within Brent on the Heritage At Risk Register	390
Table 11: Provision of Open Space within Brent.....	398
Table 12: Waste targets for Brent.....	400
Table 13: Safeguarded waste sites within Brent.....	401
Table 14: Occupation structure of Brent's residents.....	411
Table 15: Size of firms within Brent.....	416
Table 16: Levels of child poverty within Brent	420
Table 17: Levels of child poverty at ward-level	421
Table 18: Housing stock within Brent.....	423
Table 19: Tenure mix and size for market and affordable housing need in Brent, 2016-2041.....	424
Table 20: HRA process	512
Table 21: Methodology used for HRA assessment	513
Table 22: Screened European Sites	514
Table 23: Qualifying features, conservation objectives, site sensitivities and threats of identified European sites.....	522
Table 24: Screening assessment for the policies contained within the Brent Local Plan.....	532

Figures

Figure 1: The objectives of Sustainable Development.....	9
Figure 2: London Borough of Brent Administrative Boundary	13
Figure 3: Brent and neighbouring authorities.....	14
Figure 4: Male and Female Population within Brent	340
Figure 5: Brent's Age Structure, 2011-2050	341
Figure 6: Brent's Age Structure, 2018 and 2050.....	342
Figure 7: Ethnicity in Brent, 2019	344
Figure 8: Ethnicity in Brent, 2011-2050	345
Figure 9: Demand for Primary School Places 2018-2024 (Brent School Place Planning Strategy, 2018-2024).....	349
Figure 10: Demand for Secondary School Places	350
Figure 11: Number of people with a common mental disorder.....	356
Figure 12: Domestic Abuse hotspots.....	360
Figure 13: Knife and Gun crime within the borough.....	362
Figure 14: ASB hotspots	364
Figure 15: Brent's Blue Ribbon Network.....	365
Figure 16: Areas at risk of fluvial flooding.....	367
Figure 17: Areas of Brent within functional floodplain (Flood Zone 3b).....	368
Figure 18: Areas of risk of surface water flooding.....	369
Figure 19: Critical Drainage Areas (CDAs) within Brent	370
Figure 20: Storage capacity within Brent, 2014 and 2050.....	371
Figure 21: Air Quality Management Area (AQMA) within Brent	372
Figure 22: Geology of Brent	373
Figure 23: Historical Landfill Sites within Brent.....	374
Figure 24: Social Heat Vulnerability	376
Figure 25: Impacts of climate change of fluvial flood risk within Brent	378
Figure 26: Impact of climate change on surface water flooding - area around Wembley Stadium	379
Figure 27: Flood vulnerability index.....	380
Figure 28: Location of SINC sites within the borough.....	382
Figure 29: Conservation Areas within Brent	391
Figure 30: Location of Brent's Conservation Areas.....	392
Figure 31: Location of Archaeological Priority Areas (APAs) within Brent.....	394

Figure 32: Areas of low townscape quality within Brent.....	395
Figure 33: Open Spaces within Brent.....	397
Figure 34: Number of trips per mode in Brent.....	403
Figure 35: Congestion levels within Brent	405
Figure 36: Existing and proposed cycle routes within Brent.....	405
Figure 37: PTAL levels within Brent	407
Figure 38: Brent's employment sectors	412
Figure 39: Location of SIL and LSIS in Brent.....	414
Figure 40: Brent's IMD, 2019.....	418
Figure 41: Housing completions in Brent.....	Error! Bookmark not defined.
Figure 42: Average household size, 2011-2050	426
Figure 43: Housing benefit claimants by tenure, May 2018	429
Figure 44: Housing benefit claimants, November 2008 - May 2018.....	430

1. Introduction

- 1.1. The Brent Local Plan will guide the future development of the borough where the London Borough of Brent retains responsibility as the Local Planning Authority. For some parts of the borough, the Old Oak and Park Royal Development Corporation (OPDC) are currently the Local Planning Authority. The OPDC have produced their own Local Plan, which was submitted for examination in 2018. A series of public hearing sessions took place in April and July 2019. The Inspector's interim findings report has been released and the plan is being re-visited due to the proposed removal of the Cargiant site from the plan.
- 1.2. The Planning and Compulsory Purchase Act 2004 places a requirement on Local Plan authorities to undertaking a Sustainability Appraisal when preparing Development Plan Documents. Furthermore, Brent Council has a statutory duty to consider the equality impacts of decisions as part of its compliance to the Equality Act 2010.
- 1.3. The first stage of the integrated impact assessment (IIA) process was the Scoping Report, which was consulted on in February/March 2018. The Scoping Report set out the framework for undertaking the IIA of the plan and set the scope and level of detail in regards to:
 - Identifying the relevant environmental, social and economic baseline information
 - Identifying the relationship between the Local Plan and relevant plans, policies, programmes and initiatives; and
 - Identifying key sustainability issues within Brent
- 1.4. This IIA report is intended to document the assessment of the emerging Brent Local Plan, and how the policies will achieve sustainable development. It provides evidence on how the preferred policy approach was reached, and contains the evaluation of the likely significant effects that the proposed policies will have on the economy, community and environment.

This report builds upon Brent's IIA Scoping Report, which was published for consultation between 8 February to 22 March 2018. The Scoping Report set out the baseline information for the borough, identified key sustainability issues, highlighted plans, programmes and other policies which could impact the emerging Local Plan and set out the objectives which will be used to assess the plan's policies. A draft Integrated Impact Assessment of the Preferred Options Draft Brent Local Plan policies together with reasonable policy alternatives was consulted upon from 8 November 2018 to 3 January 2019. A further

version of the Integrated Impact Assessment was consulted upon from 24 October to 5 December as part of the Regulation 19 consultation of the Brent Local Plan. This version of the Assessment has been updated and amended as appropriate to reflect comments received during Regulation 19, as well as as a result of any proposed modifications to the draft Local Plan policies.

What is Sustainable Development?

1.5. The term sustainable development has been used since 1987. It followed the publication of the World Commission on Environment and Development (WCED) report “*Our Common Future*”. This report identified the risks to the planet and the human race if existing environmental, economic and social practices and trends were perpetuated. Resolution 42/187 of the United Nations General Assembly defined sustainable development as “*meeting the needs of the present without compromising the ability of future generations to meet their own needs*”.

1.6. The UK Sustainable Development Strategy – *Securing the Future (2005)* - set out the following five ‘guiding principles’ of sustainable development:

- Living within the planet’s environmental limits;
- Ensuring a strong, healthy and just society;
- Achieving a sustainable economy;
- Promoting good governance; and
- Using social science responsibly

1.7. The National Planning Policy Framework (NPPF) states that the purpose of the planning system is to contribute to the achievement of sustainable development. It identifies that to achieve sustainable development, “*the planning system as tree overarching objectives which are interdependent and need to be pursued in mutually supportive ways*”. The three objectives are identified in Figure 1.

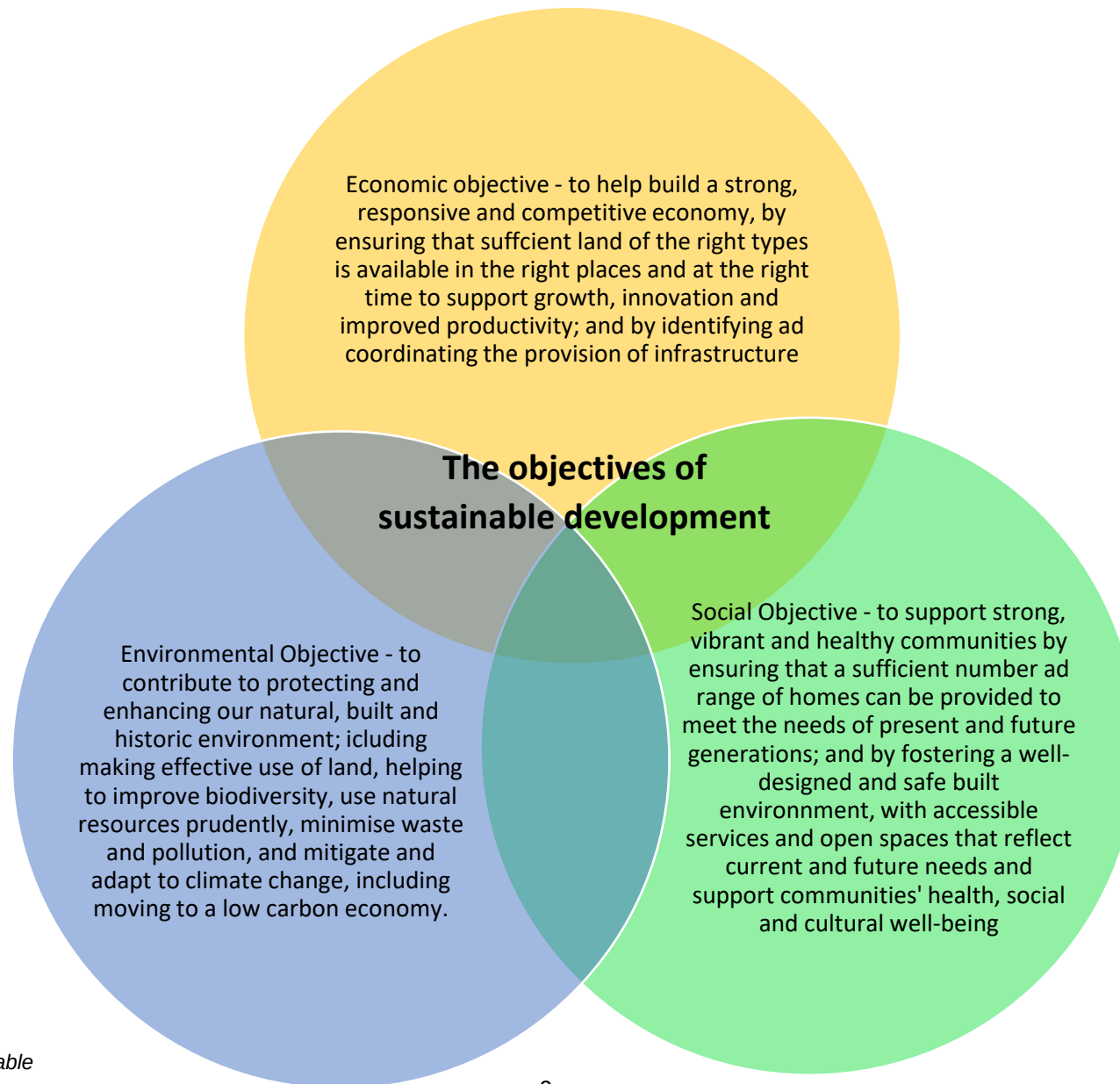


Figure 1: The objectives of Sustainable Development

What is an Integrated Impact Assessment?

- 1.8. An Integrated Impact Assessment (IIA) brings together the Sustainability Appraisal (SA), Strategic Environmental Appraisal (SEA), Health Impact Assessment (HIA) and Equality Analysis (EA) into a single framework. Each of these assessments/appraisals are explained in greater detail below.

Sustainability (SA) and Strategic Environmental Assessment (SEA)

- 1.9. A SA is an iterative process that must be carried out during the preparation of a Local Plan, and is a statutory requirement as set out in Section 19 of the Planning and Compulsory Purchase Act 2004. Its purpose is to promote sustainable development. It seeks to ensure better integration of sustainability considerations into Local Plans. SAs consider the implication of the Local Plan for a social, economic and environmental perspective. They require the assessment of options against available baseline data and sustainability objectives. SAs also assess how the plan will contribute to the achievement of sustainable development.

- 1.10. As advised in the National Planning Practice Guidance (NPPG), SAs should incorporate a Strategic Environmental Assessment (SEA). This is European Directive 2001/42/EC requirement was transposed directly into UK law through the Environmental Assessment of Plans and Programmes Regulations 2004 (commonly referred to as the Strategic Environmental Assessment Regulations). A SEA assesses the effects of certain plans and programmes on the environment.

Health Impact Assessment (HIA)

- 1.11. The role the built and natural environment, together with social and economic circumstances, plays in shaping health is increasingly recognised. A health impact assessment (HIA) identifies ways to maximise impacts for health gain, and minimise risks. Although undertaking a HIA is not compulsory, the Council will integrate this process through the IIA Framework. The IIA will expand the 'human health' topic of the SEA to ensure that relevant baseline data, key sustainability issues and opportunities, objectives and mitigation measures are identified.

Equalities Assessment (EA)

- 1.12. Section 149(1) of 'The Equality Act 2010' places a requirement on public organisations, and those who deliver public functions, to show due regard to the need to:
- Eliminate unlawful discrimination, harassment, and victimisation

- Advance equality of opportunity between people who share a protected characteristic and those who do not
- Foster good relations between people who share a relevant protected characteristic and those who do not.

1.13. The Equality Act 2010 identified nine protected characteristics, which are as follows: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. Socio-economic status (people on low incomes, young and adult carers, people living in deprived areas, groups suffering multiple disadvantages etc.) is not a characteristic protected by the Equality Act 2010. Nevertheless, the Council is committed to also considering the impact that new policies/policy changes will have on socio-economic groups.

1.14. To assist in complying with the above equality duties, the IIA will incorporate an Equality Analysis. An Equality Analysis is an assessment of whether a proposed organisational policy, or a change to an existing one, will cause a disparate impact on people who have a protected characteristic.

Habitats Regulation Assessment

1.15. A Habitat Regulation Assessment (HRA) is a requirement under the European Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Fauna and Flora (the 'Habitats Directive'). This provides for the legal protection of habitats and species of European importance. The Directive identifies an ecological network of sites known as 'Natura 2000', comprising Special Areas of Conservation (SAC) and Special Protection Areas (SPA). These will be collectively referred to as 'European Sites' in the remainder of this report.

1.16. Article 6(3) of the Habitats Directive establishes the requirement for a HRA of any plan or project which:

- Is not directly connected with the management of the site for nature conservation; and
- Either alone or in combination with other plans or projects would be likely to have significant effect on a European Site.

1.17. Within Brent there are no internationally designated SACs, SPAs or Ramsar sites (wetlands of International Importance). Five European Sites (which are listed in Table 1) are identified within 15km of Brent's boundaries. Initial HRA Screening concluded that "the emerging Brent Local Plan **is not likely to have significant effects** on the qualifying features and integrity of the identified European sites". A further screening assessment, which is contained within Appendix 3, has been

undertaken to determine whether the preferred approach is likely to have a significant effect on the identified European sites. The screening assessment will be submitted to Natural England for approval.

European Site	Conservation Status	Distance from Brent
Richmond Park	Special Area of Conservation	8km
Wimbledon Common	Special Area of Conservation	9km
Lee Valley	Special Protection Area	11km
South West London Water Bodies	Special Protection Area	15km
Epping Forest	Special Area of Conservation	15km

Table 1: European Sites identified within the Screening Assessment

The Spatial Scope

- 1.18. The IIA will cover the areas that fall within the administrative boundaries of the London Borough of Brent, where Brent is the Local Planning Authority (Figure 2). The shaded area falls within the administrative boundaries of the OPDC. As shown in Figure 3, Brent is adjoined by seven different London boroughs. Where appropriate, the IIA will consider the potential impact beyond Brent's Local Planning Authority boundary.

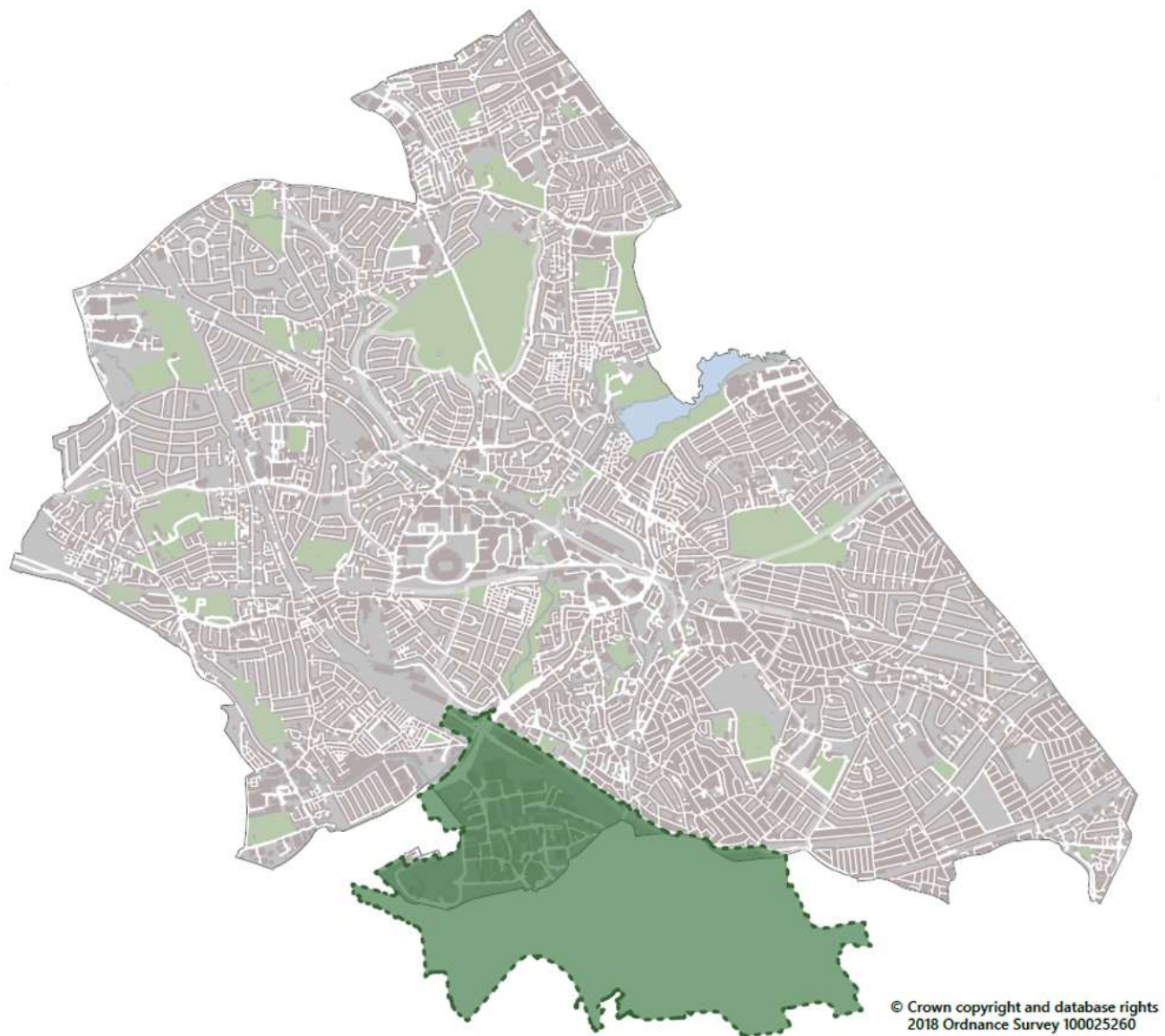


Figure 2: London Borough of Brent Administrative Boundary

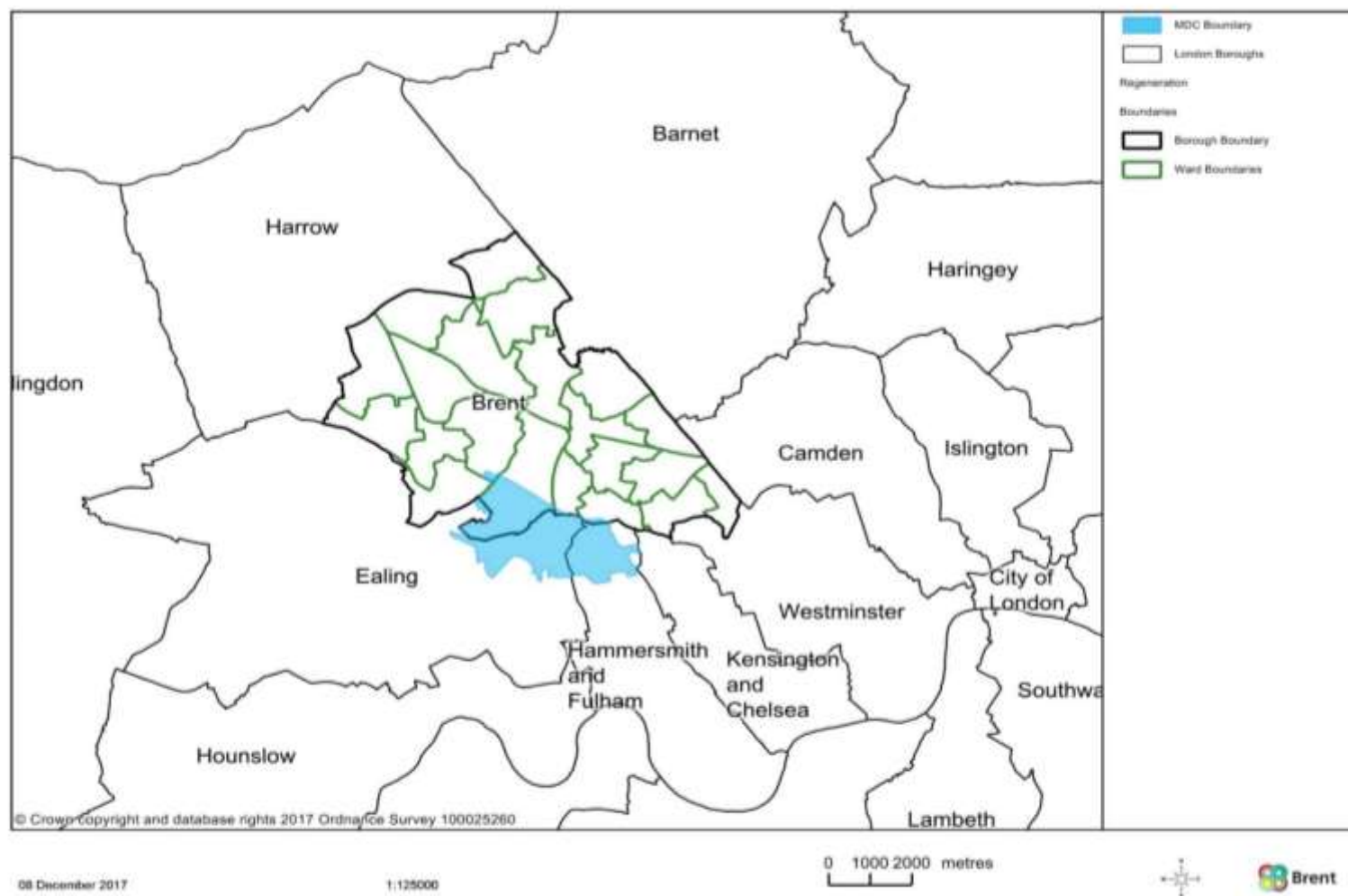


Figure 3: Brent and neighbouring authorities

2. Brent's Local Plan

2.1. Brent Council is currently in the process of taking forward a new Local Plan. Once adopted, it will replace the current Local Plan (with the exception of the Waste Plan). It provides the Council's vision, objectives, and policies and proposals for meeting social, economic and environmental development aims for the borough to 2041.

Brent's Current Local Plan

2.2. The current Brent Local Plan comprises of a suite of Development Plan Documents (DPDs). These documents are:

- Core Strategy (adopted 2010)
- Site Specific Allocations (adopted 2011)
- Wembley Area Action Plan (adopted 2015)
- Development Management Policies Local Plan (adopted 2016)
- Joint West London Waste Plan (adopted 2015)

Development Management Policies (2016)

2.3. The Development Management Policies DPD sets out detailed policies that, in conjunction with the National Planning Policy Framework, the London Plan and the Brent Core Strategy, are used to determine planning applications for development in the borough. This document completed the Brent Local Plan, and replaced the saved Unitary Development Plan policies. A Sustainability Appraisal was carried out on it. This concluded that *"Overall the policies are predicted to have positive effects. The policies score almost exclusively positive against the social and economic objectives, however, there are some mixed effects predicted in relation to some environmental objectives"*. Most of the policies in this document will be taken forward in an amended form within the draft Brent Local Plan to take account of changes in circumstance/ understanding of how they have performed.

Wembley Area Action Plan (2015)

2.4. The Wembley Area Action Plan (WAAP) sets out the strategy for the growth and regeneration of the Wembley Area for the next 15 years. It builds upon the Council's vision that was set out in the Core Strategy (2010). This was to develop Wembley as a destination, it would help drive the economic regeneration of Brent, and further promote its cultural and leisure offer attracting visitors throughout the day and evening. The WAAP includes key planning objectives and policies including the development of over 30 sites in the Wembley Area.

Joint West London Waste Plan (2015)

2.5. Six west London Boroughs (Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond upon Thames and the Old Oak and Park Royal Development Corporation) agreed to co-operate to produce a single waste plan for their combined areas that now forms part of each of their respective Local Plans. The waste plan provides a planning framework for the management of all waste produced in the six boroughs over the period to 2031. The Plan seeks to safeguard existing waste management facilities, identifies sites to be allocated for waste management development to ensure shortfall is addressed and also provides policies with which planning applications for waste development must conform.

Site Specific Allocations (2011)

2.6. The Site Specific Allocations (SSAs) document identified 70 key opportunity sites for use and development in line with the Core Strategy. The document provides policies for the future development of these sites. It sets out the broad principles of development and appropriate conditions that may be applied in respect of social, economic and environmental factors. The bulk of the document sets out allocations within the five growth areas identified within the Core Strategy. The “allocation” text details uses and particular issues that need to be addressed by development, such as setting or height. For residential sites the document provides an indicative capacity and phasing. In total, it is anticipated that the sites within the SSA will deliver 11,000 homes.

Core Strategy (2010)

2.7. The Brent Core Strategy was the first document of the previously-titled Local Development Framework. It sets out the Council's spatial vision, objectives and key policies for the development of Brent up to 2026. It is a 15-year spatial strategy that has been guided by sustainable development principles. It focused growth within five key growth areas: Wembley, South Kilburn, Church End, Colindale/Burnt Oak and Alperton. These areas were identified as key to regenerating the borough and providing the opportunity for redevelopment. The delivery of the spatial strategy contained within the document would help to deliver “*a great place, a borough of opportunity and an inclusive borough*”. The Core Strategy contains a vision plus 12 strategic objectives, which are supported by 23 policies.

3. Methodology

Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope

- 3.1. The preparation of the 'Brent Local Plan – Integrated Impact Assessment – Scoping Report' was the first stage of the IIA process for the Brent Local Plan. The draft Scoping Report was out for consultation in February/March 2018. Comments received during the consultation period have been reflected within this draft report. The Scoping Report:
- Set out the policy context for the IIA review;
 - Established the baseline data within a number of areas, including housing, population, education and climate change;
 - Identified key sustainability issues within the London Borough of Brent;
 - Developed the IIA framework, which consists of 24 sustainability objectives that would be used to appraise the policies and proposals contained within the draft Local Plan

Stage B: Developing and Refining

- 3.2. During this stage, the emerging Local Plan and its policies are assessed against the IIA framework identified within the scoping report, and repeated again in Table 2. As required by the SEA directive, this IIA report also identifies, and evaluates the reasonable alternatives identified for a number of sustainability issues. Where no reasonable alternatives could be identified, an assessment based on 'Relying on the London Plan Policies' has been applied.
- 3.3. The results of the Council's assessment on the preferred options, and their reasonable alternatives are presented in a series of matrices. The matrices include the following details:
- A score, using the scoring in Table 3, that the policy achieves against each IIA objective;
 - A commentary on the likely effects that the policies and reasonable alternatives; and
 - Where appropriate, recommendations for 'mitigation and enhancement'
- 3.4. The emerging Local Plan vision and objectives have also been assessed to ensure their compatibility with the IIA objectives identified in Table 2. Accompanying each IIA objective is a set of guide questions, which will be used to assess whether the policies/reasonable alternative will help to achieve the objective, or whether it is in conflict with it.

Integrated Impact Assessment Objectives	Criteria	Potential Indicators	Targets
Social			
Encouraging prosperity, and reducing inequalities and social exclusion S1. To promote social inclusion, narrow inequalities and address poverty for all communities within the borough.	• Will the policy/project reduce poverty and social exclusion in those areas most affected? • Will it improve affordability of essential services? • Will it promote social cohesion and integration? • Will it have a positive impact on reducing fuel poverty/ associated deaths? • Does it remove or reduce disadvantages suffered by people due to their protected characteristics?	• The borough's ranking on the Indices of multiple deprivations (IMD) • Number of households in fuel poverty • % of children in income deprived households	Reduce the area of the Borough within the lowest 20% IMD category from 2019 levels
Health and Well-being S2: To improve the health of the population and reduce health inequalities through access to necessary healthcare facilities and an environment that promotes physical and mental well-being	• Does it protect and enhance access to the provision of health care/community/open space/leisure facilities? • Will it reduce death rates? • Will it promote physical activity or increase participation in sport and leisure activities for all low participation groups?	• Levels of obesity within the borough • Open Space deficient areas • Life expectancy – borough wide and at ward level • % of population participating in 30 minutes of moderate intensity sport • Healthy Street Scores • Mortality Rate	Improve life expectancy overall and reduce the difference between the average life expectancy of the best and worst performing areas of the borough. Reduction in the level of obesity. Increase in the percentage of the borough's population that are considered to be 'Active'.

Integrated Impact Assessment Objectives	Criteria	Potential Indicators	Targets
	• Will it promote opportunities for better food choices? • Will it enhance mental well-being through a safer, more stimulating and pleasant natural and built environment? • Will it reduce health inequalities? • Does it affect specific sub-groups disproportionately compared with the whole population?	• Number of patients registered at GP surgery • Number of FTE GPs within Brent • Proportion of the borough deficient in relation to local sport facilities	
Housing S3: To provide everybody with the opportunity to live in a home which is suitable to their identified needs	• Will it increase access to good quality and affordable housing? • Will it encourage mixed use and range of housing tenure types to meet the varied and in some cases specialist needs of the population? • Will it reduce the number of unfit homes? • Will it reduce homelessness/ people living in temporary accommodation?	• Net additional dwellings during financial year • Number and % of housing completions that were affordable during financial year • Number of specialist accommodation homes built during financial year • Proportion of family sized (3+ beds) homes • Proportion of homes split by different tenures within the Census	• The 2018 SHMA identifies that the full objectively assessed for housing in Brent is 48,000 dwellings over the Plan period 2016-41, which is equivalent to 1920 dwellings per annum. This includes the objectively assessed need for affordable housing of 22,100 dwellings over the same period, equivalent to an average of 884 dwellings per annum. • Originally, the new draft London Plan indicated that

Integrated Impact Assessment Objectives	Criteria	Potential Indicators	Targets
	Will it provide an opportunity to maintain or increase owner-occupier levels?	Number of people homeless/in temporary accommodation	over a 10 year period, Brent needed to provide 29,150 dwellings per annum. However, this has since been reduced to 23,250 (2325 units per annum) in the Intend to Publish Version. 50% of new homes within affordable tenures 25% of new homes 3+ beds - Maintain or increase owner-occupation proportions at or above 2011 levels - Older people's accommodation increased at London Plan target rates - Reduce homeless and temporary accommodation numbers from 2017 levels
Quality of surroundings S4: To provide a safe, high quality and healthy environment for the borough residents to live, work and enjoy.	- Will it improve the satisfaction of people with their neighbourhoods as places to live? - Will it improve residents' amenity and sense of place?	- Noise levels within the borough - Healthy Street Scores - Accessibility to open space?	

Integrated Impact Assessment Objectives	Criteria	Potential Indicators	Targets
	• Will it reduce actual noise levels? • Will it reduce noise concerns?		
Crime and Preventing and Community Safety S5: To enhance community safety by reducing and preventing crime, anti-social activity and the perception of potential harm to personal safety	• Will it reduce actual levels of crime? • Will it reduce the fear of crime? • Will it reduce actual and perceived threats to personal safety for example from fire or terrorism?	• Number of notifiable offences during financial year • Anti-social behaviour cases open during financial year • Brent Crime rate • Number of gangs within the borough • % of population who feel safe walking outside after dark	
Community Identity S6: To recognise and provide for Brent's population diversity while encouraging a shared sense of community and cultural identity/belonging, as well as engagement in local, high quality community services and facilities	• Will it meet or, if subject to change, have the potential to meet a specific diversity need that is not currently catered for in the borough? • Will it foster a sense of pride in area? • Will it increase the ability of people to influence decisions? • Will it improve ethnic relations?	• Number of community facilities within the borough	

Integrated Impact Assessment Objectives	Criteria	Potential Indicators	Targets
	• Will it encourage communication between different communities in order to improve understanding of different needs and concerns? • Will it encourage people to respect and value their contribution to society?		
Accessibility S7: To maintain and enhance the role and vitality and viability of Brent's town centres and where possible improve accessibility to a range of services and facilities, such as healthcare and education, especially for the most vulnerable	• Will the development maintain or enhance the role and vitality and viability of Brent's town centre? • Will it improve accessibility to key local services? • Will it improve the level of investment in key community services? • Will it make access more affordable? • Will it make access easier for those without access to a car?	• Proportion of new homes or floorspace within 800 metres of a town centre • Footfall in Brent town centres • Level of ground floor vacancies in Brent town centres • Average rent for retail and other uses within Brent's town centres • Number of patients registered at a GP practice • Number of schools within the borough • Open space deficient areas	• Reduced levels of vacancy within the borough's town centres • Increase footfall in major town centres
Environmental			

Integrated Impact Assessment Objectives	Criteria	Potential Indicators	Targets
Traffic EN1: To reduce the effect of traffic on the environment through actively reducing the need to travel and promoting sustainable modes of movement	• Will it reduce the need to travel? • Will it reduce traffic volumes? • Will it increase the proportion of journeys using modes other than the car? • Will it encourage walking and cycling?	• Modal share • Proportion of new homes and other floorspace within areas of PTAL scores of 4 or more • Vehicle km travelled by mode each year • PTAL levels • Km of cycle and walking routes within the borough • Car Parking Spaces created during financial year • Proportion of underground/over ground stations with step free access.	• Increase modal share of walking to 30% by 2021/22 • Increase modal share of cycling to 3% by 2021
Waste Management EN2: To reduce the production of waste and use of non-renewable materials and maximising re-use and recycling.	• Will it minimise the production of waste and use of non-renewable materials? • Will it promote recycling? • Where reuse or recycling is not possible will it encourage potential for energy from waste to minimise volumes of land-fill?	• Recycling and composting rates • Amount of waste collected during financial year	• The new draft London Plan (2019) (Intend to Publish) contains the following figures for projected waste arising: • 2021 – household, commercial and industrial waste – 259,000 tonnes • 2041 – household, commercial and industrial waste – 274,000 tonnes

Integrated Impact Assessment Objectives	Criteria	Potential Indicators	Targets
Water Quality and Resources EN3: To improve quality of the water bodies within the borough to 'good', protect ground water quality, conserve water resources and provide for sustainable sources of water supply.	• Will it improve the quality of inland water? • Will it reduce water consumption? • Will it reduce combined sewer overflow events?	• Water Consumption Levels • Water Quality Levels • WFD status of waterbodies in the borough	• All water bodies to achieve a 'good' status by 2027
Environmental Health EN4: Minimise air, noise and light pollution and improve existing areas of poor air quality and contaminated land.	• Will it improve air quality? • Will it reduce noise pollution? • Will it reduce light pollution? • Will it help to achieve the objectives of the Air Quality Management Plan? • Will it reduce emissions of key pollutants?	• Amount of contaminated land remediated • Status of water bodies within the borough • % of borough within AQMA • Noise levels within the borough	
Biodiversity EN5: To conserve and enhance the borough's natural habitats, biodiversity, flora and fauna, water bodies and increase opportunities for people to access nature in all areas of the borough	• Will it conserve and enhance habitats of borough or local importance and create habitats in areas of deficiency? • Will it promote naturalisation and enhancement of rivers?	• Number of SINCs within the borough • Changes in the areas and populations of biodiversity importance • Status of water bodies within the borough • Number of TPOs created during financial year	• All water bodies to achieve a 'good' status by 2027 • Development schemes within the borough achieve a net gain for biodiversity

Integrated Impact Assessment Objectives	Criteria	Potential Indicators	Targets
	• Will it conserve and enhance species diversity; and in particular avoid harm to protected species? • Will it maintain and enhance woodland cover and management? • Will it encourage protection of and increase the number of trees? • Will it improve access to the borough's biodiversity? • Will it improve connectivity between the boroughs habitats by creating a network of green infrastructure?	• Number of TPOs within the borough • Proportion of developments that incorporate green roofs or other features that have potential to enhance biodiversity • DEFRA Biodiversity calculator for developments and Borough schemes. • Mapping exercise every 3-5 years of newly created habitat to track efforts of improved landscape connectivity won through development and schemes. • River morphology surveys through the Brent Catchment Partnership to qualify the natural state and functioning of the Brent's rivers.	
Landscape and Townscape EN6: Create, enhance and maintain attractive and clean environments including	• Will it enhance the quality of priority areas for townscape and public realm enhancements?	• Number of Anti-Social Behaviour cases opened for littering • Developments occurring in priority areas for	

Integrated Impact Assessment Objectives	Criteria	Potential Indicators	Targets
protecting and enhancing the borough's landscape and townscape.	• Will it minimise visual intrusion and protect views? • Will it decrease litter in urban areas and open spaces?	townscape and public realm enhancements • Quality status of the borough's open spaces (Green Flag)	
Historic Environment and Cultural Assets EN7: To protect and where appropriate enhance the historic environment and cultural assets.	• Will it protect and enhance Conservation Areas and other sites? • Will it protect and enhance features and areas of historical and cultural value, such as assets of community value? • Will it protect listed buildings? • Will it help preserve and record archaeological features?	• Number of buildings on heritage at risk register • Number of listed buildings • Number of conservation areas • Number of buildings on the borough's Local List • Changes in the number of public houses • Changes in number of music venues, nightclubs, cinemas, theatres and art galleries	• No buildings on the heritage at risk register
Climate Change Mitigation EN8: To mitigate against the impacts of climate change, predominately through reducing greenhouse gas emissions	• Will it reduce emissions of greenhouse gases by reducing energy consumption? • Will it lead to an increased proportion of energy needs being met from local district heating and energy networks or renewables sources?	• Renewable energy installed by type • Proportion of dwellings/other floorspace connect to combined heat and power of district heating networks • Greenhouse gas emissions, by source, within the borough	• National target or reducing greenhouse gas emissions by 80% by 2050 • In 2017, the Mayor of London committed London to being zero carbon by 2050. This target is applicable to Brent.

Integrated Impact Assessment Objectives	Criteria	Potential Indicators	Targets
	Will it reduce emission of ozone depleting substances?	Progress made against the actions contained within the Council's Climate Change Strategy	
Climate Change Adaption EN9: Promote measures which adapt against the impact of climate change	- Will it reduce the risk of damage to property from storm events? - Will it maintain or ideally reduce the potential for over-heating/urban heat island effect?	- Renewable energy installed by type - SuDS installed during financial year - Number of developments built within a flood zone area	- National target or reducing greenhouse gas emissions by 80% by 2050 - In 2017, the Mayor of London committed London to being zero carbon by 2050. This target is applicable to Brent.
Land and Soil EN10: To safeguard and conserve soil quality and quantity within the borough	- Will it minimise development on Greenfield sites? - Will it ensure that where possible; new development occurs on derelict, vacant and underused previously developed land and buildings? - Will it ensure land is remediated as appropriate? - Will it minimise the loss of soils to development? - Will it maintain and enhance soil quality?	- Soil quality within the borough - Number of LGIS within the borough	Protect Barnhill as a Locally Important Geological Site (LGIS)

Integrated Impact Assessment Objectives	Criteria	Potential Indicators	Targets
	Will it reduce the risk of subsidence?		
Open Space EN11: Protect, enhance, and where possible increase the amount of open spaces that are high quality, easily accessible and multi-functional.	- Contribute to addressing areas of open space deficiency? - Improve the quality of open space? - Increase the accessibility of an open space?	- Number of open spaces within the borough - Open space deficient areas within the borough - Loss of open space during financial year - Number of open spaces obtaining Green Flag standard or equivalent - Public opinion on open spaces within the borough	- No open space deficient areas within the borough - All open spaces are of 'good' or better quality
Flood Risk EN12: To reduce the risk of flooding and resulting detriment to public well-being, the economy and the environment	- Will it avoid areas of flood risk? - Where it cannot avoid risk areas will it minimise the risk of flooding from rivers, watercourses, surface water and sewage to people and property	- Number of applications granted permission within Flood Zone 3 % of borough located within undefended Flood Zone - Flooding Events	- No or reduced reports of property level flooding during flood events - No applications granted contrary to Environment Agency advice in flood Zone 3
Economic			
Growth and Regeneration EC1: To actively promote sustainable, resilient and inclusive economic growth and regeneration which tangibly benefits Brent	- Will it encourage the maintenance and provision of land and premises for identified employment needs? - Will it encourage new business start-ups and	- Number of employee jobs within the borough - Number of businesses within the borough - Amount of floor space development for employment by type	

Integrated Impact Assessment Objectives	Criteria	Potential Indicators	Targets
residents and the environment	opportunities for local people? • Will it promote regeneration? • Will it reduce disparities within the surrounding areas? • Will it improve business development and enhance productivity? • Will it improve the resilience of business and the local economy? • Will it promote growth in key sectors? • Will it promote growth in key clusters? • Will it enhance the impact of the area as a business location?	created during the financial year • Amount of employment floorspace lost during the financial year	
Employment EC2: To offer everybody the opportunity for rewarding and satisfying employment /self-employment	• Will it reduce short and long-term local unemployment? • Will it provide job opportunities for those most in need of employment? • Will it help to reduce long hours worked	• Unemployment rate within the borough • Employee jobs, by sector, within the borough	

Integrated Impact Assessment Objectives	Criteria	Potential Indicators	Targets
Investment EC3: To facilitate both indigenous and inward investment within the borough	• Will it reduce commuting? • Will it improve accessibility to work by public transport, walking and cycling? • Will it reduce journey times between key employment areas and key transport interchanges? • Will it facilitate efficiency in freight distribution?	• Journey times to key employment areas • Mode of travel to work • Number of businesses opened within the borough during financial year • Size of businesses opened within the borough during the financial year	
Education and Skills EC4: Maximise the potential for everybody to contribute economically through increasing and improving the provision of and access to childcare, education and training facilities, volunteering opportunities and informal employment	• Will it improve qualifications and skills of the population? • Will it improve access to high quality educational facilities? • Will it help fill key skill gaps?	• Average grades achieved during financial year for KS2, KS3, KS4 and KS5 • Pupil population of Brent • OFSTED status of schools within Brent • Education space created during financial year • Education space lost during financial year • Demand for primary school and secondary school places within the borough	

Integrated Impact Assessment Objectives	Criteria	Potential Indicators	Targets
Efficient Infrastructure EC5: To encourage efficient infrastructure to support economic growth	• Will it reduce commuting? • Will it improved accessibility to employment places by public transport? • Will it facilitate efficiency in freight distribution?	• Number of km travelled during the financial year by freight vehicles • Amount of freight carried by rail during the financial year • Amount of freight carried by water during the financial year • Number of residents employed within the borough • Mode of transport to work • Proportion of the borough within access to high speed broadband/IT infrastructure to meet modern day requirements	

Table 2: IIA Framework

Symbol	Likely effect against the IIA objectives	Description of effect
++	Significant Positive	Very likely to lead to a significant opportunity/improvement, or a series of long-term improvements, leading to large-scale permanent benefits to the sustainability objective being appraised. The impact is likely to benefit a large area of the borough, or a large proportion of the boroughs residents. The policy/project is like to create a major positive effect that could have cumulative and indirect beneficial impacts and/or improve conditions outside the specific policy or project area – will have positive transboundary effects.

+	Minor Positive	Likely to lead to moderate improvement in both short and long-term, leading to large scale temporary or medium-scale permanent benefits to the objectives being appraised. The impact is likely to be limited to a small area within the borough, or a small proportion of the boroughs residents. The magnitude of the predicted effects of the policy/option will be minor.
0	Neutral	Unlikely to have any beneficial or negative impact/effect on the objective being appraised, either in the present or future.
-	Minor Negative	Likely to lead to moderate damage/loss in both short and long-term, leading to large-scale temporary, or medium scale permanent negative impact on the objective. The impact is likely to be limited to a small area within the borough, or limited to small groups of people. The effects can either be direct or indirect, with the magnitude likely to be minor. It is also likely that it will be possible to mitigate or reverse a minor negative effect through policy or project intervention.
--	Significant Negative	Very likely to lead to significant damage in the long-term, or a series of long-term negative effects, which leads to a large-scale and permanent negative impact on the sustainability objective being appraised. The impact is likely to affect the whole, or large areas of the borough or the majority of the population. The detrimental impacts of the policy/option will be hard to reverse and are unlikely to be easily mitigated through policy or project intervention.
?	Unknown	The effect of a policy/option cannot be, or is not, known or is too unpredictable to assign a conclusive score.
+/-	Mixed	The effect is likely to be a combination of beneficial and detrimental effects, particular where effects are considered on sub-issues, areas of criteria.
N/A	Not Applicable	This is applied to objectives that will not be affected by the policy/option that is being assessed.

Table 3: Scoring for the IIA

- 3.5. In addition to the appraisal of policies and reasonable alternatives, the Council also assessed emerging site allocations. Site allocations contained within the Plan were identified through a number of different means, which includes: public consultation, reviewing growth areas, undertaking a Strategic Housing and Land Availability Assessment (SHLAA), and pre-application discussions.

- 3.6. To appraise the site allocations contained within the emerging Local Plan, select sustainability criteria were identified. Like in the IIA appraisal of the preferred policy approach and reasonable alternatives, social, economic and environmental factors, and the impact that the proposed development would have on these were appraised. However, some factors relevant to appraisal of the preferred policy approach and reasonable alternatives were not considered to be applicable to all site allocations. The matrix that was used to assess site allocations is identified below.

Objective Outputs Assessment	Significant Positive ++	Minor Positive +	Neutral or Mixed +/- 0	Unknown Effects ?	Minor Negative -	Significant Negative --
S1a: Area is within a London Strategic Area for Regeneration.	Site of 1 hectare or more within a London Strategic Area for Regeneration	Site of less than 1 hectare within a London Strategic Area for Regeneration	Site boundary within 100 metres of a London Strategic Area for Regeneration	NA	Site boundary 100 metres or more from a London Strategic Area for Regeneration	NA
S2a: Walking distance to healthcare facilities.	NA	Within 800m of a healthcare facility	NA	NA	More than 800m from a healthcare facility	NA
S2b: Walking distance to open space and sports facilities.	Within 800m of an area of open space and within 800m of a sports facility/leisure centre?	Within 800m of an area of open space or within 800m of a sports facility/leisure centre	NA	NA	More than 800m from any area of open space or sports facility/leisure centre	NA
S3a: Housing Provision Assessment.	100+ homes	10-99homes	9 or fewer homes gained or lost/potential displaced	NA	10-99 homes lost/potential displaced	100+ homes lost/potential displaced
Crime and Preventing and Community Safety	Area currently associated with high levels of crime		Area currently associated with average levels of crime related to		Area currently associated with low levels of crime	

Objective Outputs Assessment	Significant Positive ++	Minor Positive +	Neutral or Mixed +/- 0	Unknown Effects ?	Minor Negative -	Significant Negative --
	related to layout/ uses/ social mix		layout/ uses/ social mix		related to layout/ uses/ social mix	
S7a: Walking Distance to Services and Facilities.	Within 800m of a town centre, <u>and</u> 2,000m of an employment area	Within 800m of a town centre	NA	NA	More than 800m from a town centre	More than 800m from a local centre <u>and</u> more than 2,000m from an employment area
S7b: Walking distance to schools.	Within 1,000m of a secondary school <u>and</u> 500m of a primary school	Within 500m of a primary school and more than 1,000m from a secondary school	NA	NA	More than 500m from a primary school <u>and</u> within 2,000m of a secondary school	More than 500m from a primary school <u>and</u> more than 2,000m from a secondary school
EN1a: PTAL Score of Site taking account of known public transport improvements.	PTAL, 6a & 6b	PTAL 5,4	PTAL 3		PTAL 2	PTAL 1, 0
EN2a: Avoiding conflicts with waste management sites.	NA	NA	All other sites	NA	Within 300m of an industrial area in which the WLWP considers waste uses to be acceptable	Within 300m of an active or committed waste facility
EN3a	NA	Opportunity to enhance setting of watercourse/	All other sites			

Objective Outputs Assessment	Significant Positive ++	Minor Positive +	Neutral or Mixed +/- 0	Unknown Effects ?	Minor Negative -	Significant Negative --
		provide better access/ naturalisation				
EN4a: Exposure to low air quality or noise.			Not within an AQMA or within 50m of an A road, motorway, railway line, or industrial area		Partly within an AQMA <u>or</u> within 50m of an A road, motorway, railway line, or industrial area	Wholly within an AQMA <u>and</u> within 50m of an A road, motorway, railway line, or industrial area
EN4b: Contribution to road traffic increases within AQMAs.	NA	NA	All sites, within PTAL 4-6		All sites, within PTAL 3	All sites within PTAL 0-2
EN4c: Within an area of contaminated land.	NA	Not within an area of contaminated land	NA	Within an area of contaminated land	NA	NA
EN5a: Within an area of recognised ecological value.			Not within a recognised area of ecological value		Within London level ecological value designation	Within national level ecological value designation
EN7a: Qualitative Assessment of Potential Impact on Heritage/ Cultural Significance.			Not designated.	Carried out by Council's conservation officer.		
EN11a Presence of brownfield land, derelict	Redevelopment of derelict and/ or disused brownfield site	Redevelopment of brownfield site currently in use but	Redevelopment of brownfield land that is in use but does not have any poor	NA	Loss of greenfield land that is not designated as open space	Loss of all or part of designated open space

Objective Outputs Assessment	Significant Positive ++	Minor Positive +	Neutral or Mixed +/- 0	Unknown Effects ?	Minor Negative -	Significant Negative --
buildings, and open space.		creating a poor environment	environment issues NA			
EN12a: Flood Risk From Rivers.	NA	NA	All other sites	NA	Majority (>50%) within Flood Zone 2 or Smaller proportion (1-50%) within Flood Zone 3	Majority (>50%) within Flood Zone 3
EN12b: Flood Risk from Ground Water.	NA	NA	All other sites	NA	Majority (>50%) within 'moderate' groundwater flood risk area <u>or</u> smaller proportion (1-50%) within 'high' or 'very high' groundwater flood risk area	Majority (>50%) within 'high' or 'very high' groundwater flood risk area
EN12c: Flood Risk from Surface Water.	NA	NA	All other sites	NA	Smaller proportion (1-50%) within 1 in 100 year surface water flood risk area	Majority (>50%) within 1 in 100 year surface water flood risk area
EC2a: Employment Floorspace Change	> +4,500 sq.m. gain	< 4,500 sq.m. and > 1000 sq.m. gain	< 1000 sq.m. gain and < - 1000 sq.m.loss	NA	>-1000 sq.m. and <-4500 sq.m. loss	>-4,500 sq.m. loss

Stage C: Preparing the IIA Report

3.7. This report details the process that has been undertaken to date in carrying out the IIA of the Brent Local Plan. It contains five main parts, which include:

- A Non-Technical Summary – provides a summary of the key findings and recommendations of the Integrated Impact Assessment, avoiding where possible technical language;
- Sustainability Context - provides baseline information for the Local Plan and identifies plans, programmes and policies that can impact/assist the delivery of the Brent Local Plan;
- Appraisal of preferred policies and reasonable alternatives – this section presents the findings of the alternatives and preferred options;
- Appraisal of site allocations - this section presents the findings of the assessment of site allocations;
- Appendices – contains information which support the IIA report and its findings.

Stage D: Consulting on the Final Proposals (Publication) document and IIA Report

- 3.8. The Council consulted on the Final Proposals (Publication) document and IIA report from 24 October to 5 December 2019. Comments received in relation to this stage informed modifications to the Local Plan which need to be considered in a revised IIA. In line with SEA requirements and national legislation, the Council directly consulted the following stakeholders: Historic England, Environment Agency and Natural England.
- 3.9. Following the Publication Stage of consultation, comments received from the Environment Agency resulted in the methodologies of EN12a, EN12b and EN12c being amended. The amended methodologies for these objectives (and respective site allocation assessments) can be found below. The resulting updated site allocation assessments are in Chapter 9.

Objective Outputs Assessment	Significant Positive ++	Minor Positive +	Neutral or Mixed +/- 0	Unknown Effects	Minor Negative -	Significant Negative --
EN12a: Flood Risk From Rivers.	NA	All of site within Flood Zone 1	Smaller proportion (1-50%) within Flood Zone 2	NA	Majority (>50%) within Flood Zone 2 or Smaller proportion (1-50%) within Flood Zone 3	Majority (>50%) within Flood Zone 3

EN12b: Flood Risk from Ground Water.	NA	All of site is within a 'low' or no groundwater flood risk area	Smaller proportion (1-50%) within a 'moderate' groundwater flood risk area	NA	Majority (>50%) within 'moderate' groundwater flood risk area <u>or</u> smaller proportion (1-50%) within 'high' or 'very high' groundwater flood risk area	Majority (>50%) within 'high' or 'very high' groundwater flood risk area
EN12c: Flood Risk from Surface Water.	NA	None of the site is located within a 1 in 100 year surface water flood risk area (all other sites)	NA	NA	Smaller proportion (1-50%) within 1 in 100 year surface water flood risk area	Majority (>50%) within 1 in 100 year surface water flood risk area

Further Stages

- 3.10. Stage E is monitoring the implementation of the Plan following its adoption, which will include aims and methods for modelling as well as potentially responding to adverse impacts.

4. Sustainability Context

Relevant Plans, Policies and Programmes

- 4.1. As identified in the IIA Scoping Report, other strategies, plans and programmes can have an influence in the Brent Local Plan. In addition, Schedule 2 of the SEA regulations requires SEA's to:
- Outline the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes; and
 - Identify the environmental protection objectives, established international, community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.
- 4.2. The Scoping Report contained a comprehensive review of policies, plans, programmes and strategies that were considered to be relevant and influential on the Brent Local Plan. These plan, programmes and policies together with subsequent amendments, or additions since the scoping report was issued have been summarised in Table 4. More information about the plans, programmes and policies identified below is contained within Appendix 2.
- 4.3. It should be noted that since the publication of the Scoping Report, the National Planning Policy Framework has been updated. The revised NPPF places a greater focus on housing delivery, and should be used as a tool to ensure that there is planning for the right homes, at the right places and of the right quality, but at the same time protecting the environment.
- 4.4. Furthermore, the new draft London Plan has been through examination. Since the Publication stage of the Brent Local Plan consultation, the Mayor of London has confirmed that he will accept the panel of Inspectors' recommendation for local authorities' housing targets to be reduced. This means that Brent's housing target in the new London Plan has been reduced from 2915 per annum to 2325 per annum.

IIA Objective	Relevant Plan, Policy or Programme	Overarching Theme(s)
Overarching	• European Directive 2001/42/EC • National Planning Policy Framework, Department for Communities and Local Government, 2019 • The London Plan, GLA, 2016	Sets out the overarching planning framework for sustainable growth. The overarching themes present in this document is applicable to all objectives.

IIA Objective	Relevant Plan, Policy or Programme	Overarching Theme(s)
	• The draft London Plan (Intend to Publish), GLA, 2019 • Brent Borough Plan 2019-2023, Brent Council • Brent Inclusive Growth Strategy, 2019-2040, November 2019 • The UK Government Sustainable Development Strategy, 2005	
Economic		
Employment	• Industrial Strategy White Paper, HM Government, November 2017 • The Culture White Paper, DCMS, March 2016 • The Mayor's Economic Development Strategy for London, GLA, December 2018 • A City for All Londoners, GLA, October 2016 • Culture and night-time economy SPG, GLA, November 2017 • Culture for All Londoners – Mayor of London's Culture Strategy, GLA, 2018 • Town Centres SPG, GLA, July 2014 • Land for Industry and Transport SPG, GLA, September 2012 • London Office Policy Review, GLA, 2017 • London 2036: An Agenda for Jobs and Growth, LEP & London First, 2015 • A Regeneration Strategy for Brent 2010-2030, Brent Council • Employment, skills and enterprise strategy 2015-20, Brent Council	Promote sustainable economic development and a range of employment opportunities.
Education & Skills	• The Children Act 2004 • Policy statement: Planning for schools' development, Department for Communities and Local Government, August 2011 (supersedes the Statement of 26th July 2010) • Education Act 2011 • DfE strategy 2015 to 2020: world-class education and care, Department for Education, March 2016 • The Mayor's Economic Development Strategy for London, GLA, December 2018	Seeks to improve educational attainment through the provision and access to good quality education. Seeks to improve training opportunities

IIA Objective	Relevant Plan, Policy or Programme	Overarching Theme(s)
	• Culture for All Londoners – Mayor of London’s Culture Strategy, GLA, 2018 • International Education Strategy: global potential, global growth, Department for Education, Department for International Trade, March 2019 • Employment, Skills and Enterprise Strategy 2015-20, Brent Council • London Borough of Brent School Place Planning Strategy 2019-2023, Brent Council, November 2018	
Efficient Infrastructure	• Mayor’s Transport Strategy, GLA, 2018 • The Mayor’s Economic Development Strategy for London, GLA, December 2018 • London Infrastructure Plan 2050, GLA, March 2015	Promotes the prioritisation of space-efficient modes of transport which will help to tackle congestion and improve the efficiency of the street for essential traffic Supports healthy streets approach and plans for growth, both housing and economic, around the transport network
Growth and Regeneration	• The Mayor’s Economic Development Strategy for London, GLA, December 2018 • Estate Regeneration National Strategy, December 2016, DCLG • London 2036: An Agenda for Jobs and Growth, LEP & London First, 2015 • A Regeneration Strategy for Brent 2010-2030, Brent Council	Promotes sustainable growth and regeneration
Social		
Prosperity, Inequalities and Social Inclusion	• Equality Act 2010 • Planning Policy for Traveller Sites, Department for Communities and Local Government, August 2015	Seeks to create an equal society, which recognises people’s different needs and provides fair opportunities for all.

IIA Objective	Relevant Plan, Policy or Programme	Overarching Theme(s)
	• Draft Guidance on Housing Needs for Caravans and Houseboats, March 2016, DCLG • Housing White Paper; fixing our Broken Housing Market, Department for Communities and Local Government, February 2017 • A City for All Londoners, GLA, October 2016 • Social Infrastructure SPG, GLA, May 2015 • Shaping Neighbourhood Accessible London; Achieving an Inclusive Environment, GLA, October 2014 • Culture for all Londoners: Mayor of London's Culture Strategy, GLA, December 2018 • Cultural Metropolis: Achievements and Next Steps, GLA, 2014 • Culture and the night-time economy SPG, GLA, November 2017 • Play and Informal Recreation SPG, GLA, September 2012 • Town Centres SPG, GLA, July 2014 • Homes for Londoners – Affordable Housing and Viability SPG, GLA August 2017 • Housing SPG, GLA, updated August 2017 • Planning for Equality & Diversity in London, GLA, October 2007 • Inclusive London: The Mayor's Equality, Diversity and Inclusion Strategy, GLA, May 2018 • Financial Inclusion Strategy, Brent Council, September 2015 • A Regeneration Strategy for Brent 2010-2030, Brent Council • Stronger Communities Strategy 2019-2023, Brent Council • Safer Brent Community Safety Strategy 2018-2021, Brent Council • Safer Brent Partnership Community Safety 2018-2019 Annual Report, Brent Council • Brent Equality Strategy, 2019-2023	Seeks to remove barriers which limit what people can and cannot do.
Health and wellbeing	• Health for Growth 2014-2020, European Commission, 2011 • The Children Act, 2004	Seeks to improve health and well-being

IIA Objective	Relevant Plan, Policy or Programme	Overarching Theme(s)
	• White Paper: Healthy Lives, Healthy People: our strategy for Public Health in England, Department for Health, June 2011 • Planning for Sport Aims and Objectives, Sport England, July 2017 • Playing Fields Policy and Guidance, Sport England, March 2018 • Play and Informal Recreation SPG, GLA, September 2012 • The London Health Inequalities Strategy, GLA, September 2018 • The Mayor's Food Strategy GLA December 2018 • Healthy Streets for London – Prioritising walking, cycling and public transport to create a healthy city, GLA, February 2017 • NW London Sustainability and Transformation Plan – Our Plan for North West Londoner to be well and live well, NW London STP System, October 2016 • Brent Health and Wellbeing Strategy 2014-17, Brent Council and NHS Brent • Planning for Sports and Active Recreation Facilities Strategy 2008-2021, Brent Council and Sport England, 2007 • Food for Thought – A Food Growing and Allotment Strategy for the London Borough of Brent and Associated Action Plans, Brent Council • Fit for Life – A Physical Activity Strategy for Brent, 2016-2021, Brent Council	Promotes greater levels of physical activity Support innovative solutions to improve healthcare provision. To reduce health inequalities
Housing	• Planning Policy for Traveller Sites, Department for Communities and Local Government, August 2015 • Estate Regeneration National Strategy, December 2016, DCLG • Housing White Paper; fixing our Broken Housing Market, Department for Communities and Local Government, February 2017 • Planning and Affordable Housing for Build to Rent, February 2017, DCLG • The 2017 London Strategic Housing Market Assessment, GLA, November 2017	Seeks the creation of a mixed and balanced community by meeting the housing requirements of the whole community, including those in need of affordable and specialist housing

IIA Objective	Relevant Plan, Policy or Programme	Overarching Theme(s)
	• The London Strategic Housing Land Availability Assessment 2017, GLA, November 2017 • Assessing Future Potential Demand for Older Persons Housing, Care Homes and Dementia Housing in London, Three Dragons (on behalf of the GLA), November 2017 • A City for All Londoners, GLA, October 2016 • Homes for Londoners – Affordable Housing and Viability SPG, GLA, August 2017 • Housing SPG, GLA, updated August 2017 • London Housing Strategy, May 2018, GLA • Town Centres SPG, GLA, July 2014 • Draft Housing Strategy, 2017 -2022, Brent Council • A regeneration strategy for Brent 2010-2030, Brent Council • West London Strategic Housing Market Assessment October 2018 • Brent Strategic Housing Market Assessment Update October 2018	
Quality of Surroundings	• European Landscape Convention 2000 • Sustainable Design & Construction SPG, GLA, April 2014 • Town Centres SPG, GLA, July 2014 • Play and Informal Recreation SPG, GLA, September 2012 • All London Green Grid, GLA, March 2012 • All London Green Grid SPG, March 2012 • ALGG Area Frameworks • Healthy Streets for London – prioritising walking, cycling and public transport to create a health city, GLA	Maintain and enhance the quality of the environment

IIA Objective	Relevant Plan, Policy or Programme	Overarching Theme(s)
Community Identity	- Equality Act 2010 - Culture for all Londoners – Mayor of London's Culture Strategy, GLA, December 2018 - Culture and the Night Time Economy SPG, GLA, November 2017 - Social Infrastructure SPG, GLA, May 2015 - Brent Equality Strategy 2019-2023, Brent Council, 2019 - Inclusive London – The Mayor's Equality, Diversity and Inclusion Strategy, GLA, May 2018	Advance equality of opportunity, eliminate discrimination, and foster good relations. Maximise the contribution the art, culture and heritage facilities can make to the community Creating a positive community identity
Accessibility	- Accessible London; Achieving an Inclusive Environment, GLA, October 2014 - Town Centres SPG, GLA, July 2014	Enhancing accessibility for all
Crime Prevention and Community Safety	- Secure by Design Homes 2019 - Safer Brent Partnership Community Safety Strategy Annual Report 2018-2019 - Stronger Communities Strategy 2019-2023, Brent Council	Identifying a sophisticated and modern approach that will through the improvement of data and technology will see a reduction in crime. Reducing the fear of crime
Environment		
Traffic	- West London Sub Regional Transport Plan, Transport for London, 2016 update - Mayor's Transport Strategy 2018 - Brent's Parking Strategy 2015, Brent Council - Bent's Walking Strategy 2017-2022, Brent Council - Brent's Cycling Strategy 2016 – 2021, Brent Council - Brent's Long-term Transport Strategy 2015-2035, Brent Council	Promote the use of sustainable modes of transport over private vehicle use. Promote the efficient use of the transport system

IIA Objective	Relevant Plan, Policy or Programme	Overarching Theme(s)
	• Healthy Streets for London – prioritising walking, cycling and public transport to create a health city, February 2017, GLA	
Water Quality & Resources	• Water Framework Directive 2000/60/EC • Urban Waste Water Treatment Directive 91/271/EEC • Future Water: The Government's Water Strategy for England, Department for Environment, Food and Rural Affairs, June 2011 • Written Ministerial Statement: Sustainable Drainage Systems, December 2014 • Review individual flood risk assessments: standing advice for local planning authorities, EDRA & EA, updated March 2019 • National Flood Resilience Review, September 2016, HM Government • London Sustainable Drainage Action Plan, October 2015, GLA • Sustainable Design & Construction SPG, GLA, April 2014 • Securing London's Water Future, GLA, October 2011 • Part 1: Thames Basin District River Basin Management Plan, DEFRA, 2015 • Part 2: River basin management planning overview and additional information, DEFRA, 2016 • The London Rivers Action Plan and UK Projects Map, The River Restoration Centre, January 2009 • Brent River Corridor Improvement Plan, Brent River Catchment Partnership, 2014 • London Environment Strategy, GLA, May 2018	Improve water quality, address flooding and water scarcity.

IIA Objective	Relevant Plan, Policy or Programme	Overarching Theme(s)
Environmental Health	• EU Directive on Ambient Air Quality and Management 96/62/EC • UK Clean Air Strategy, Department for Environment, Food and Rural Affairs, 2019 • UK plan for tackling roadside nitrogen dioxide concentrations – an overview, Department for Environment Food and Rural Affairs, Department for Transport, July 2017 • UK Detailed Air Quality Plan, July 2017, DEFRA, DfT • Sustainable Design & Construction SPG, GLA, April 2014 • The Control of Dust and Emissions during Construction and Demolition SPG, GLA, July 2014 • Clearing the air: The Mayor's Air Quality Strategy, GLA, December 2010 • New Proposals to Improve Air Quality, October 2016, GLA/TfL • Brent's Air Quality Action Plan 2017-2022, Brent Council • European Directive: Environmental Noise Directive 2002/49/EC • Noise Policy Statement for England, Department for Environment, Food and Rural Affairs, March 2010 • Sounder City: The Mayor's Ambient Noise Strategy, GLA, March 2004	Improving air quality through reducing exposure to PM_{2.5} and nitrogen dioxide, tackling sources of air pollution Prevent and reduce environmental noise and preserve quiet areas
Biodiversity	• European Directive 92/43/EEC and amended by 97/62/EC on the conservation of natural habitats (<i>The Habitats Directive</i>) • Wildlife and Countryside Act 1981 • Natural Environment White Paper, DEFRA, June 2011 • 25 Year Environment Plan DEFRA January 2018 • UK Post-2010 Biodiversity Framework, Joint Nature Conservation Committee and Department for Environment, Food and Rural Affairs, 2012 • Green Infrastructure and Open Environments: London's Foundations: Protecting the geodiversity of the capital: Supplementary Planning Guidance, GLA and London Geodiversity Partnership, March 2012	Enhance and protect biodiversity, and improve access to nature. Promote naturalisation. Addressing a number of areas which impact London's environment

IIA Objective	Relevant Plan, Policy or Programme	Overarching Theme(s)
	- Improving Londoners Access to Nature: London Plan Implementation Report, GLA, February 2008 - Green Infrastructure and Open Environments: Preparing Borough Tree and Woodland Strategies, GLA, February 2013 - London Biodiversity Action Plan, London Biodiversity Partnership, 2001 - London Environment Strategy, GLA, 2018 - Food for Thought – A Food Growing and Allotment Strategy for the London Borough of Brent and associated Action Plans, Brent Council - Brent Biodiversity Action Plan 2007, Brent Council - London Environment Strategy, GLA, May 2018	
Open Space	- All London Green Grid, GLA, March 2012 - All London Green Grid SPG, March 2012 - ALGG Area Frameworks - Play and Informal Recreation SPG, GLA, September 2012 - Food for Thought – A Food Growing and Allotment Strategy for the London Borough of Brent and associated Action Plans, Brent Council - Brent Parks Strategy 2010-2015, Brent Council	Promotes the protection and enhancement of open spaces Recognises the importance of open spaces and their contribution to improving quality of life
Landscape & Townscape	- European Landscape Convention 2000 - All London Green Grid, GLA, March 2012 - All London Green Grid SPG, March 2012 - All London Green Grid Area Frameworks - London View Management Framework SPG, GLA, March 2012 - Green Infrastructure and Open Environments: London's Foundations: Protecting the geodiversity of the capital: Supplementary Planning Guidance, GLA and London Geodiversity Partnership, March 2012 - Preparing Borough Tree and Woodland Strategies SPG, February 2013, GLA - Brent Parks Strategy 2010-2015, Brent Council	Promote the conservation and protection of appropriate landscape, townscapes and their settings. Recognises the importance of open spaces, sport and recreation and the contribution that these areas can make in improving quality of life.
Historic Environment	European Convention on the Protection of the Archaeological Heritage (revised), 1992	Promotes the achievement, preservation and enhancement of

IIA Objective	Relevant Plan, Policy or Programme	Overarching Theme(s)
& Cultural Heritage	• Planning (Listed Building and Conservation Areas) Act 1990 • Ancient Monuments and Archaeological Areas Act 1979 • Land Contamination and Archaeology, Good Practice Guide, February 2017, Historic England • The Heritage Statement 2017, December 2017, DCM • The Setting of Heritage Assets Advice Note, December 2017, Historic England • Tall Buildings Advice Note, December 2015, Historic England • Brent Archaeological Priority Areas, Historic England • Translating Good Growth for London's Historic Environment, April 2017, Historic England • Historic England's Conservation Principles	historic assets and archaeological heritage.
Flood Risk	• Flood Risk Management Strategy, Brent Council, 2018 • Future Water: The Government's Water Strategy for England, Department for Environment, Food and Rural Affairs, June 2011 • Flood and Water Management Act 2010	Seeks to reduce the impacts of flood risk Promotes mitigation measures against flood risk
Climate Change Adaption Climate Change Mitigation	• Directive on the Promotion of the Use of Energy from Renewable Sources 2009/28/EC • Flood and Water Management Act 2010 • Energy Act 2013 • Climate Change Act 2008 • UK Climate Change Programme 2006 • The UK Low Carbon Transition Plan, HM Government, July 2009 • The Carbon Plan, HM Government, December 2011 • UK Renewable Energy Strategy, HM Government, 2009 • Future Water: The Government's Water Strategy for England, Department for Environment, Food and Rural Affairs, June 2011	Promotes the move to a low carbon future through sustainable design. Promotes mitigating and adapting to climate change. Promotes the use of renewable energy and renewable technologies in appropriate locations.

IIA Objective	Relevant Plan, Policy or Programme	Overarching Theme(s)
	- Planning for climate change – A Guide for Local Authorities on Planning for Climate Change, TCPA & RTP, December 2018 - Managing Risks and Increasing Resilience: The Mayor's Climate Change Adaption Strategy, GLA, October 2011 - Sustainable Design & Construction SPG, GLA, April 2014 - London Environment Strategy, GLA, May 2018 - Flood Risk Management Strategy, Brent Council, 2018 - Climate Change Strategy, Brent Council	Tackling climate change and reap the positive economic benefits that solutions can bring.
Waste Management	- Waste Framework Directive 2008/98/EC - National Planning Policy for Waste, October 2014 - London's Waste Resource: The Mayor's Municipal Waste Management Strategy, GLA, November 2011 - London Environment Strategy, GLA, May 2018 - Joint West London Waste Plan, 2015	Prevention or reduction of waste and its harmfulness and the recovery of value from waste by means of recycling, re-use and reclamation.
Land & Soil	- Safeguarding our soils- A Strategy for England, Department for Environment, Food and Rural Affairs, 2009 - Environmental Protection Act 1990 - Hazardous Substances Technical Consultation, October 2014, DCLG	England's soil is managed sustainably and degradation threats tackled successfully. Improve the quality of England soils and safeguard their ability to provide essential services for future generations

Table 4: Relevant Plans, Policies and Programmes

Baseline Information

- 4.5. Annex I of the SEA directive requires that the 'likely significant effects' of policies on the existing environment to be assessed. Due to the Council adopting an IIA approach, the 'likely significant effects' of policies on existing social, economic, health and equalities baseline.

4.6. The IIA Scoping Report identified a range of social, economic and environmental baseline data for the borough. From this data, key sustainability issues, as summarised in Table 6, were derived.

4.7. It should be noted that the baseline information for the borough will change over time. Therefore, it will need to be monitored and revised as appropriate. Full baseline information for the borough is contained in Appendix 1.

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevant Draft IIA Objective(s)
Population and Equality	- Brent is the 7th largest London borough – home to an estimated 335,300 people as at 2019. - Brent's population has grown significantly since 2001. High growth is predicted to continue with the population projected to grow by between 2019 and 2041 and by 23.7% by 2050 – from approximately 335,000 in 2018 to approximately 407,000 by 2050. - In 2017/18, 32,600 people moved in to Brent and 34,000 moved out – the 24th highest turnover rate in the UK - Brent is the 14th most densely populated area in the UK, with approximately 7,652 people per square kilometre - Brent has a birth rate of 14.2 births per 1000 population, just above the London (13.5) rate and well above the rate across England (11.2). However, rates have been declining in recent years (locally and nationally).	- The significant increase in population will place additional pressure on Brent's housing and infrastructure. The Local Plan should ensure that there is sufficient provision of housing and infrastructure that supports both existing and future population. - The Local Plan should be mindful of the borough's ageing population, whom may require bespoke housing solutions and a different type of environment. - The projected increase in population will create an extra demand for educational establishments and recreational facilities, such as parks and leisure centres, inclusive of all age groups. - The wider population trend of an ageing population could place additional pressure on the borough's infrastructure, particularly healthcare facilities.	S1, S3, S6, S7

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevant Draft IIA Objective(s)
	- The increase in population is likely to change the age structure and ethnicity of the borough's residents - The current population structure shows that Brent has a young population with a median age of 35, 5 years below the UK average. - The number of residents aged 65 years and over is expected to almost double between 2019 and 2041 rising from 40,900 to 75,800, accounting for 41% of the total population growth. The child population is expected to grow far more slowly, growing by 12% in the same period. - The gender split in the population is 51% male and 49% female. The proportion of men is highest in the 20-39 age group, where they comprise 53-54% of the population. However, women make up a higher proportion of Brent's elderly population – 62% of those aged 85 and over are female. - The proportion of the population who are of working age is predicted to grow by 18% by 2041. - Brent is one of the most ethnically diverse boroughs in the UK, with BAME groups making up 65.5% of the	- There is also a need for the Local Plan to seek to create attractive areas for young people and those looking to raise a family. - Brent has a diverse community and the plan will be need to mindful of the different needs of groups i.e. ensuring there is a range of religious facilities and different types of housing to suit the needs of the community. - The Plan will need to consider integration of communities. Developments should ensure that there is inclusive design to support the diverse population of the borough. The built environment should encourage community cohesion and reduce isolation. - Language could be a potential barrier that prevents some residents from engaging in the Local Plan process.	

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevant Draft IIA Objective(s)
	population, with the Indian ethnic group making the highest proportion. It is likely that the increase in population will create changes in the ethnicity of the borough. It is forecasted that there will be an increase in 'Other White' and 'Other Asian' ethnic groups, with a decrease in the population 'White Irish' and 'Black Caribbean'. ○ There are 149 languages currently being spoken in Brent, with English being the main language for 62.8% of the population. ○ Around one in seven Brent residents have a long-term health problem or disability that limits their day-to-day activities in some way. ○ Brent has relatively high birth rates – in 2017 there were 5208 live births, equating to the tenth highest fertility rate in England and Wales. ○ The 2011 census found that around 43% of Brent residents were married and 0.3% were in a civil partnership. ○ Statistics about the size of the LGB population vary considerably. However, the 2017 GP Patient Survey found that 4.6% of Brent residents surveyed		

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevant Draft IIA Objective(s)
	identified as Lesbian, Gay, Bisexual or "other". ○ The Government Equalities Office estimates that around 0.3-0.8% of the UK population are transgender. In Brent this would equate to between 1000 to 2500 people. ● The borough's three largest religious groups are Christian (41%), Muslim (19%) and Hindu (18%). Between 2001 and 2011, there was a slight change in Brent's resident's religion or belief – there was a slight decline in those who stated that Christianity was their religion/belief, and a growth in the amount of residents who stated that their religion or belief was Islam. Compared with other areas, Brent residents are more likely to have a religion – in Brent, 82% of residents have a religion compared to just 68% nationally.		
Education & Qualifications	● As of March 2018 there were 85 schools in Brent. ● Brent's school population has increased from 44,117 in 2011 51,524 in the 2017-2018 year. ● By 2023/2024 an additional 12 secondary forms of entry will be required.	● The Local Plan should seek to ensure that there is adequate provision of primary and secondary schools to support the current and future population. ● Opportunities to incorporate work based learning/training should be incorporated into the Local Plan where possible.	S1, S7, EC4

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevant Draft IIA Objective(s)
	- At the end of 2017-2018, 96% of Brent schools were judged to be good or outstanding. - The proportion of primary pupils attaining the expected standard in reading, writing and mathematics at the end of KS2 was 63%, slightly below the London and national average. - In regards to secondary education, the average attainment rate in 2018 within Brent was 49.8, above the London average. - In 2018, on average, Brent students attained a grade C in each of their three A Level subjects. - The largest ethnic groups of statutory school age are Asian Indian (17%) and Black Somali (9%). - In 2018, there were 2076 Brent resident children and young people with an Education Health and Care Plan, of whom 1900 were attending a school and 176 were attending a further education provision. - The most common type of EHCP need within current school age children is Autistic Spectrum Disorder, followed by Moderate Learning Difficulties.	The Local Plan could explore the opportunities to evenly spread out the location of primary and secondary schools within the borough	
Health	Brent's residents are living longer, and life expectancy has been increasing. The life expectancy between 2016 and 2018 for girls	There is an opportunity for the Local Plan to promote physical activity by ensuring sufficient	S1, S2,S4, S7

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevant Draft IIA Objective(s)
	born in Brent is 85.1 compared to 80.2 for boys. Life expectancy varies at ward levels between the most deprived and least deprived wards for both male (6.4 years) and female (6.9 years) • The current care provision in Brent is 67 practices, 66 dental practices, 75 pharmacies and 16 nursing homes. • Obesity is a significant health challenge to the borough, with it projected to increase between 2014 and 2030. • Over half of Brent's adult population do not participate in sport or physical activity, the highest level of inactivity in West London with 3 in 10 adults classified as being inactive. • The rate of alcohol-related harm hospital stays is 561 per 100,000 population. • Mental health remains the single largest cause of morbidity within Brent, affecting $\frac{1}{4}$ of all adults at some time in their lives. • The TB incidence rate in Brent (82.9 per 100,000) is significantly higher than the London average. • Cardiovascular disease, chronic respiratory disease and cancers are the biggest killers in Brent. • The borough has high levels of long-term chronic conditions, many of which can often	sport and recreational facilities, in addition active travel, promoting walking and cycling. • The Local Plan should seek to protect and enhance the borough's current open spaces. • The Local Plan should seek to ensure that new developments can access open spaces and help to address areas of open space deficiency. Accessibility to green spaces can have benefits for both physical and mental health. • There is the opportunity for the Local Plan to identify schemes that will help its high street achieved a high school in the Healthy Streets Measure (out of 10) • Due to scale of development needed to achieve the London Plan housing targets, new healthcare facilities will need to be delivered.	

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevant Draft IIA Objective(s)
	be related to poor lifestyles, relative deprivation and in some cases ethnic make-up. • There is a rising level of dementia amongst older adults, with it expected that the total population who are aged 65 and over with dementia projected to increase from 2,379 to 3,857 by 2030. • Only 47.1% of the population in Brent were meeting the recommended 5-a day fruit and vegetable intake in 2014, below the London average of 50%. • Brent has 30,616 households with people living on their own. Of these, 29% are 65 and over. With the projected growth of those aged 5 and over it is forecasted that there will be a significant increase in those affected by social isolation and loneliness. • The GFR in Brent in 2018 was 68.1, higher than the Outer London and national average.		
Crime	• Brent had the 5th highest number of domestic abuse crimes in comparison to most similar boroughs in the year to 16/17 • The number of crimes within Brent has increased by 3.1% in the year to 2018/19, although the rate is below the London average. • Brent has been identified as having a national-level gang issue.	• The Local Plan should seek to ensure the design of development improves the safety and perceived safety of communities, in accordance with Secured by Design principles. • The Local Plan will need to consider integration of communities. Developments should ensure that there is inclusive design to support the diverse population of the borough.	S4, S5

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevant Draft IIA Objective(s)
	○ Based on the 2017 gang matrix it is estimated that there are 22 gangs in Brent ○ It is estimated that there is over 1,000 individuals involved in gang criminality in Brent ○ However, as at 18/19, emerging gangs in Kingsbury, Wembley, Neasden and Willesden are now the main problem profile in Brent ● Anti-social behaviour (ASB) is a key priority in Brent ○ In 18/19 Brent received the third highest number of ASB calls in comparison to most similar London Boroughs. ○ Hotspots for ASB are gathered around the town centres ● In 2018, 47% of the population said that they felt safe walking outside in their local area alone after dark, with 15% feeling a bit unsafe and 10% feeling very unsafe.	The built environment should encourage community cohesion and reduce isolation. ● The Local Plan should encourage the use of lighting and passive surveillance to help improve perceptions of safety.	
Water	● All waterbodies within Brent's Blue Ribbon Network are achieving a 'moderate status'. The Water Framework Directive requires all members' states to achieving a 'good status' for all water bodies. ● Areas in proximity to Welsh Harp, Wealdstone Brook and the River Brent, and	● The Local Plan should seek to improve water quality by promoting the naturalisation of water bodies and ensuring that there is sufficient infrastructural capacity for new development, ahead of occupation including Sustainable Urban Drainage Systems.	EN3, EN4, EN12

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevant Draft IIA Objective(s)
	areas within the Stonebridge Ward are at risk of fluvial flooding. • There are a number of areas within the borough that are at risk to surface water flooding. Areas particularly susceptible to surface water flooding is the borough's road network • Areas within the borough that are located in functional floodplain are in close proximity to the River Brent. • The borough has 27 critical drainage areas within Brent. • The two areas of the borough where surface water flooding is likely to be caused by pluvial, sewer and groundwater flooding is Kenton and Northwick Park and Preston Road. • There are areas within the northern and western region of the borough where sewer capacity is near full utilisation.	• The Local Plan should require increased efficiency in the use of water through design measures. • The Local Plan should support opportunities for recreation on Grand Union Canal and Welsh Harp. • The Local Plan should seek to reduce risk of flooding to people and property through guiding development to areas of lowest risk of flooding, and require developments to include mitigation schemes, such as SUDS when appropriate.	
Air Quality	• Brent does not meet the national air quality targets for Nitrogen Dioxide (NO₂) and Particulate Matter (PM₁₀). • The largest contributor the poor air quality in Brent is local energy generation, construction and road transport. ○ Transport and traffic is the largest contributor, accounting for at least 52% of all emissions.	• The Local Plan should seek to improve air quality. This can be achieved through a variety of means, such as the promotion of renewable energy, the full enclosure of waste management activities, modal shift to public transport and sustainable construction.	EN1, EN4

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevant Draft IIA Objective(s)
	- It is likely that pollution for construction works will continue to be a big polluter due to the amount of homes required to be built. - The Council has created four air quality action areas at Neasden Town Centre, Church End, the Kilburn Regeneration Area and Wembley and Tokyngton.		
Soils & Geology	- The geology of Brent consists predominantly of London Clay of the Barnet Plateau underlain by a chalk aquifer. - Barn Hill Open Space has been put forward for designation as a Locally Important Geological Site (LIGS), due to the presence of Dollis Hill Gravel. - As of November 2014, 1778 sites were identified as having potentially contaminative historic uses. However, as at 2018, sufficient information has been identified for 360 sites as to whether they were 'contaminated' as per the statutory definition.	- The Local Plan should seek to protect LIGS. - The Local Plan should seek to support the decontamination of soil within the local area - The Local Plan should seek to protect the area's soils from contamination and continue to remediate areas that were impacted in the past	EN4, EN10
Climate Change	- There are a number of 'possible' future risks (i.e. heavy thunderstorms and intense winter downpours, increased storminess, higher temperatures) that could occur in Brent as a result of climate change - Climate change will have a number of social impacts of the borough's residents. - In 2017, the Mayor of London committed to London being zero carbon by 2050. Nearly	- Greenhouse gas emissions should be reduced at the rate, and exceeding where possible, required to meet local and national targets, helping to mitigate the impacts of climate change. - The reduction of energy use in the area should be encouraged both by existing developments and future ones. This might include the	EN8, EN9, EN12

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevant Draft IIA Objective(s)
	half of Brent's emissions come from the resident's homes, with a third from industry and commercial and a fifth from road transport. Climate Change can increase the area within the borough which is impacted by flood risk; both fluvial and surface water.	development of a site-wide decentralised energy generation in growth areas. - A high proportion of energy generated should be from low, zero or negative carbon energy sources. - The Local Plan should ensure that developments take into consideration the impact that climate change could have on flood risk within the borough, and where appropriate, that appropriate mitigation and adaption schemes are implemented.	
Biodiversity, Flora & Fauna	- The condition of the 62 Sites of Importance for Nature Conservation (SINCs) varies from poor structure and species diversity to species-rich and structurally diverse. - There are a number of invasive species recorded on various SINC sites. - Three of the commoner invasive species were recorded in Brent River Park, and large stands of Japanese Knotweed were recorded on several sites, particular on the railway tracksides. Parakeets were found in a number of parks within the borough. - There are no European or other internationally designated sites in the borough. The closest international site is Richmond Park. - There are 260 TPO's within the borough	- The Local Plan should seek to ensure that impacts to designations, species and habitats is minimised as well as seeking to encourage increased biodiversity within the area, having regard to the site specific recommendations of the SINC study. - Opportunities should be sought to ensure that protected species have favourable conservation status and are thriving, and invasive species are removed. - Opportunities should be sought to promote habitat connectivity both within the area and outside of it, taking into account strategic links identified in the All London Green Grid and the Blue Ribbon Network. The layout of connected habitats and a wider green infrastructure scheme of walking and cycling routes could form the basis for the Local Plan.	EN3, EN5

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevant Draft IIA Objective(s)
	Located within Brent and Barnet is the Brent Reservoir SSSI. The SSSI is of interest primarily for breeding wetland birds (in particular for significant numbers of nesting great crested grebe). The diversity of wintering waterfowl and the variety of plant species growing along the water margin are also of special note for Greater London.	- The Local Plan should explore opportunities to incorporate biodiversity into new developments. - The Local Plan should continue to protect trees with preservation orders, and where appropriate create encourage the creation of new TPOs.	
Architectural and archaeological heritage (Heritage Assets)	- Brent's heritage assets include a wide range of architectural styles from Victorian Italianate, Gothic Revival, suburban 'Arts and Crafts', 'Tudor Bethan', 'Old World', modern and brutalist. - Brent has 1 Grade I listed building, 9 Grade II* listed buildings and almost 240 Grade II listed buildings - It has 3 Registered Parks and Gardens and 40 parks and gardens on the London Parks and Gardens Trust national inventory - Brent has 9 properties on Historic England's Heritage at Risk register. - There are 22 conservation areas in Brent, which covers 7.47% of the borough. - The Council has identified 4 archaeological priority areas (APAs) where there are significant known archaeological interest or potential for new discoveries. It has also	- The Local Plan should ensure that both designated and non-designated or undiscovered heritage assets and their settings, and archaeological remains are protected and, where appropriate, enhanced. - Heritage assets throughout the borough could provide an opportunity for tourism and leisure. Opportunities should be sought to safeguard and promote awareness of the important heritage assets and their settings. - Heritage assets could also provide an opportunity to enhance the area environmentally, socially, as well as economically through regeneration. This should be considered throughout the development of the Local Plan, with assets being enhanced and conserved for future use. In particular opportunities to protect heritage identified as being at risk should be considered.	EN7

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevant Draft IIA Objective(s)
	identified 40 local sites of Archaeological Importance (SAI) There are over 200 non-designated heritage assets on the Council's Local List.	- The Local Plan will need to be mindful of the planned review of Archaeological Priority Areas in 2019. - The Council should consider reviewing its Local List alongside the Local Plan.	
Landscape and Townscape	- A townscape Analysis undertaken in 2007 found that a number of areas within the borough were of a low townscape quality. - However, since this study was undertaken many areas, such as South Kilburn, Stonebridge and Wembley, have been subject to, or are in the process of significant development. This has resulted in improvements to the quality of the built environment and the public realm. - The majority of Brent is within the 'Brent Valley and Barnet Plateau' landscape area. - There are 180 open spaces, of various types and size, located within the borough.	- The Local Plan will be supported by an Urban Characterisation Study, to inform how townscape character and quality is maintained/enhanced through high quality design, careful siting, and incorporation of soft landscaping. - Opportunities could be sought to maintain the important heritage of Brent. - Integration with the All London Green Grid Area SPG Frameworks is an important consideration.	S4, EN6, EN11
Waste	- The total amount of municipal waste collected in 2018/19 was 106,900 tonnes, a reduction from 107,683 in 2017/18. - In 2018/19, 33% of the borough's waste was recycled and composted. - In Brent, there are 12 existing safeguarded sites, with the Veolia Transfer Station and	The Local Plan should seek to increase rates of recycling, reuse and composting of waste, which would otherwise be sent to landfill. For example, through innovative solutions such as the 'integrated circular economy,' whereby products are created, used and recycled locally.	EN2

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevant Draft IIA Objective(s)
	Twyford Transfer Station identified for increased capacity. The London Plan (2016) allocated each borough an amount of London's waste that it has to positively plan for and manage. The new draft London Plan (Intend to Publish) also forecasts the arisings of household, commercial and industrial waste.	- The Local Plan will need to ensure Brent continues to contribute to meeting West London's Waste apportionment in line with the West London Waste Plan. - This will need to be balanced with the need to improve air quality, and therefore the Plan may seek to promote innovative waste management and transport techniques which are less detrimental to air quality.	
Transportation	- The most popular mode of transport for Brent residents is the car, accounting for an average of 41% of trips originating in Brent per day. - Brent has a relatively limited high-order road network which plays an important role for freight and traffic which cannot be transferred to public transport. - In 2013, 846 million vehicle kms were travelled in Brent, which equates to 2.9% of all London traffic. - High levels of congestion reduce the quality of life for Brent residents. - Between 2004 and 2012, Brent saw a 45% reduction in KSIs (killed or seriously injured) from road traffic collisions. In 2017, 6 people were killed and 126 were seriously injured. - Cycling only accounts for a small proportion of trips originating within Brent (1%).	- Opportunities should be sought to maximise modal shift towards sustainable transport modes, in particular, walking and cycling. - The Local Plan should seek to maximise opportunities to improve rail capacity within the borough - The Local Plan should encourage the use of rail as a means of getting around the borough, and to other locations within London. - The Local Plan should identify opportunities that will allow development around transport hubs. - Opportunities should be sought to direct development to accessible locations and secure transport upgrades to enable development. - The Local Plan can help increase the modal share of journeys by bike by protecting existing and securing new cycle routes, in line with the	EN1, EC5

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevant Draft IIA Objective(s)
	• Pedestrian share accounted for 26% of all trips made by Brent residents and those which originate from within the borough. The Council aims to increase this to 30% by 2021/22. • Brent is well served by a variety of public transport networks (4 London Underground Lines, London Overground services, Chiltern Railway services, southern railway services and London bus services). • Public transport accounted for 33% of resident trips per day. The most popular mode of public transport for Brent residents was the bus. ○ 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 • There is variation in PTAL levels across the borough, particularly between the northern and southern region. However, public transport schemes, such as the West London Orbital Route, can see improvements in accessibility in some areas. • Brent has a number of industrial estates that both rely on and generate freight movement. • There were approximately 88,000 on-street parking places across the whole of Brent.	route network identified in the Brent Cycling Strategy. • Ensure streets designed to healthy streets and living streets standards to promote walking. • The Local Plan could promote opportunities to use sustainable modes of transport to move freight, such as rail and canal	

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevant Draft IIA Objective(s)
	- The Council has introduced 40 controlled parking zones across the borough, serving 56,000 households and with over 33,000 on-street parking spaces. - The Council operates 12 public car parks which has a total of 796 spaces. There are also over 700 spaces in privately owned car parks.		
Noise	- There are a number of sources of noise pollution in the borough. These sources include ambient noise, which can originate from transport and industry. These are supplemented by more periodic local noise such as construction works, roadworks, late night venues, public events, street activities and ventilator/extractor units. - Areas adjacent to the North Circular Road in Brent has been identified as amongst the most affected by traffic noise in the UK. - The Council has identified a number of quiet areas within the borough.	- The Local Plan should seek to minimise the effects from noise pollution on the existing and incoming population, and ensure that these effects do not disproportionately affect any particular socio-economic or equalities group. - The Local Plan should seek to protect the tranquillity of Quiet Areas.	EN4
Local Economy	- Brent's resident workforce totals approximately 164,830 as at March 2019. - SOC (Standard Occupation Classification) Major Groups 1-3 forms the largest portion of Brent's workforce. However, the proportion of the resident workforce in these groups	- The Local Plan should seek to provide employment and business opportunities that meet the current and future needs of the local and regional economy. - The Local Plan should consider how it can continue to support local enterprise, including micro-enterprises.	EC1, EC2, EC3, EC4, EC5

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevant Draft IIA Objective(s)
	is significantly lower than the London average. The number of businesses based in Brent has grown from 10,220 in 2010 up to 15,030 in 2018 – an increase of 47%. This has been driven by a rise in the number of small “micro” businesses. ○ Over the same period, the employment rate has been rising: around 69.5% of Brent’s working age population are now in employment. • There are a number of SOC groups that are over-represented in Brent. These include skilled trade occupations and elementary occupations. • Brent’s key employment sectors are ‘Motor Trades (16%)’, ‘Retail’ (10%), ‘Education’ (9%) and ‘Business Administration and Support Services’ (9%). • Micro businesses (0-9 employees) form a significant proportion of the borough’s business stock. • Large businesses represent the smallest share of business stock within the borough. • There is currently a total of approximately 395ha of land currently in active industrial use in Brent. Strategic Industrial Land accounts for around 75% of the borough’s total industrial land portfolio, Locally	• The Local Plan should seek to ensure that the appropriate infrastructure capacity is developed and planned comprehensively, ahead of the occupation of new development. • There is a need to address the shortfall in office floorspace, and ensure sufficient employment land is provided to meet the assessed need. • The Local Plan could support the creation of mixed-use development • The Local Plan should encourage the provision of affordable employment space. • Targeted approach to employment, ensuring all within the borough have equal access to employment	

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevant Draft IIA Objective(s)
	Significant Industrial Sites around 14% and the remainder is contained within Local Employment Sites. - There is approximately 27700 sqm of gross office B1a floorspace in Brent's town centres, and a further 74,000 sqm predominantly in industrial clusters. There is additional demand for between 32,600sqm and 52,350 sqm of office floorspace in the borough has been identified to 2029. However, office floorspace is under threat from prior approvals. - In 2019, the average gross weekly pay in Brent was estimated to be £610.20 for full time workers. This is lower than the London average of £699.20.		
Deprivation and living environment	- Brent's is the 49th most deprived borough in the UK. - Brent is divided into 173 Lower Super Output Areas (LSOAs), of which 10 are within the 10% most deprived LSOAs in the country. - In 2015, the claimant rate for Housing Benefit was 30% in Stonebridge and Harlesden, 6% in Northwick Park and under 5% in Kenton. In March 2018, there were 24,488 housing benefit claimants overall. - In 2015, it was estimated that 14,702 dwellings were fuel poor, which equates to	- Deprivation is a complex issue with multiple aspects. In delivering employment opportunities, high quality new housing, improved social infrastructure, including access to education, and a higher quality environment the Local Plan can contribute toward reducing deprivation. - As there are areas within the borough that are within the 10% most deprived LSOAs in the country, the Local Plan could consider a targeted approach to reducing deprivation.	S1

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevant Draft IIA Objective(s)
	13.1% of all households. This is higher than both the London average and England average. - In 2011-2014, levels of child poverty in Brent was higher than the London and England average. - The highest rates of child poverty in the borough are in Dollis Hill, Alperton and Kilburn.		
Housing	- It is estimated that there are 121,048 households in Brent (as at 2011). It is projected that the number of households will increase by 1.45% each year to 2050. - Brent's 2018 SHMA identified an OAN of 48,000 dwellings between 2016-2041, which equates to 1920 dwellings per annum. This includes an OAN for 22,100 affordable homes over the same time period, which equates to an average of 884 dwellings per annum. The draft London Plan 2018 places the requirement on the borough to 2,915 dwellings per annum over a ten-year period. - The 2018 SHMA identified that there was a high need for 3 bedroom properties in both the market and affordable sectors. - There is variation in the housing stock across the borough; wards within the southern region have a higher proportion of	- A key challenge for the Local Plan will be to identify sufficient sites to meet the borough's housing need, with a particular focus on affordable housing. - The Local Plan will need to secure an appropriate mix to meet need, in terms of size, tenure and specific specialist needs. - The Local Plan will need to be informed by an assessment of the need for further gypsy and traveller plots.	S3, S4

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevant Draft IIA Objective(s)
	flats, whereas wards within the northern region have a higher proportion of houses. • There has been a significant increase in the amount of flats/maisonettes or apartments within the borough. This dwelling type now accounts for $\frac{1}{3}$ of the borough's housing stock. • Between 2001 and 2011, the mean household size in Brent went from 2.6 to 2.8. It is anticipated that the average household size will fall to 2.3 by 2050. • Between January 2013 and December 2019, house prices in Brent were above the London average for the majority of the time and significantly above the national average. • The amount of the population who own their own house has decreased since 2001, with there being a significant tenure shift to the private rented sector. • There is one Gypsy and Traveller site in the borough at Lynton Close, Wembley, which contains 31 plots.		

Table 5: Baseline Information

5. Draft Local Plan Vision and Objectives

5.1. The Brent Local Plan contains the following vision:

“Brent will continue to be a great place to live and work. Brent will welcome change and good growth concentrated in accessible areas that better delivers shared prosperity.

The Local Plan will ensure a future built for everyone through regeneration to grow the local economy, improve health and well-being and provide the jobs, homes, transport, green spaces and cultural assets that people need.”

5.2. The vision of the draft Local Plan vision has been assessed against the objectives contained within the IIA frameworks. The results of this assessment are displayed below.

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
Local Plan Vision	++	+	++	+	+	+	+	+	?	?	?	+	?	+	?	?	?	+	?	+	+	+	?	?
The Vision is concise and high level in terms of its content. Overall in terms of its influence on the Local Plan contents and outcomes it should serve to positively impact on the following objectives including: social inclusion (significantly), health, housing (significantly), crime, diversity, accessibility, traffic, biodiversity, heritage, open space, flooding, regeneration, employment, investment education, and efficient infrastructure. The vision is inclusive, seeking to attain growth that meets the needs of everyone. The emphasis on the provision of homes, jobs, transport, good health and well-being and some of the social infrastructure that																								

people need for good quality of life will assist ensuring better health of the population. Delivery of these outcomes is also likely to have positive impacts in relation to reduction of crime as people can better meet their needs and be less likely to turn to crime to meet those needs, or perpetrate crime related to feelings of alienation.

On waste management, water resources, environmental health, townscape, climate change mitigation and adaption, soil, flooding, education and infrastructure the vision the impacts are less clear as there is no direct reference to these issues. Greater clarity on this would only be addressed through a longer vision which identifies a much wider range of issues. Whilst this might more obviously address strategic sustainability objectives it is likely to result in a long vision, which will be less clear on what are the most important priorities.

On age, race and sexual orientation, disability, pregnancy and maternity, sex, marriage and civil partnership, gender reassigned and belief the policy will have benefits to those with a protected characteristic. The vision makes reference to providing ‘a future built for everyone’ and as such is inclusive at the widest level in its approach to meeting the needs of the local population. The more detailed aspects such as providing more homes, jobs, transport, green spaces, health and well-being and cultural assets will have differing positive impacts depending on the extent to which some of those protected characteristic groups are more likely to otherwise have limited choice to access these items. For instance black and minority, or disabled people are more likely to live in poverty, have lower wages, etc. and therefore more reliant on affordable housing, or public transport to move around.

- 5.3. The vision of the Local Plan is supported by a number of objectives; these are reflective of the six good growth principles/policies identified within the London Plan. The objectives supporting the Brent Local Plan identify locally specific priorities to assist in the delivery of the good growth policies.

Strong and Inclusive Communities

- a) Reduce spatial inequalities within Brent and incidences of areas with high levels of multiple deprivation by promoting mixed and balanced communities particularly around Wembley, Stonebridge, Harlesden, Neasden and South Kilburn and on council housing estates.
- b) Building on Brent’s status as London Borough of Culture 2020 by supporting inclusive places, where ethnic diversity is celebrated and recognised, and places where cultural activities are already concentrated, e.g. Wembley, Cricklewood and Kilburn High Road

- c) Create a more equal and affordable borough, where the opportunities to access good quality housing, employment, education, digital connectivity and culture are maximised
- d) Strengthen the existing sense of community by celebrating Brent's diversity, heritage and culture, and creating places where Brent's community can meet

Making the best use of land

- a) Prioritising development in new and more efficiently and intensively developed Growth Areas such as Northwick Park, Staples Corner and Neasden and continuing to deliver in those that have already been started, such as Alperton, Burnt Oak/Colindale, Church End, South Kilburn and Wembley to enhance environmental quality, and bring benefits to the community
- b) Supporting higher density development in Brent's town centre and in areas with good accessibility to public transport
- c) Encouraging greater access, recreational use and also understanding of ecology in Brent's extensive areas of open spaces, such as the Welsh Harp and Fryent Country Park

Creating a Healthy Borough

- a) Using the iconic sporting heritage associated with Wembley stadium to play its part in stimulating greater levels of activity
- b) Integrating physical activity back into the everyday lives of residents through promoting safe environments, active travel and improving access to open spaces, sports and leisure facilities.
- c) Improving physical and mental well-being for borough residents by adopting a health-integrated planning approach
- d) Reducing health inequalities through focusing on narrowing the gap between the most affluent and the most deprived areas of the borough
- e) ensure that there is sufficient supply of indoor and outdoor sports provision to meet demand which will assist in increasing the levels of sports participation and physical activity within the Borough

Growing a Good Economy

- a) As a 'provide capacity' borough in the London Plan, make better use of Brent's ~~employment~~ industrial land through a structured approach to deliver industrial ~~its~~ intensification and land release, where appropriate and also where possible support additional housing/ community facilities through co-location.

- b) Support Brent's priority high streets in adapting to the changing way people shop, lifestyles and the challenges posed by other large centres in London
- c) Promote and support a strong and diverse night-time economy in Kilburn to contribute to London's role as a 24-hour city

Increasing Efficiency and Resilience

- a) Reduce carbon emissions by supporting the continued expansion of local and renewable energy systems such as those at Wembley Park and South Kilburn into other Growth Areas
- b) Tackle congestion and air quality around the North Circular, improving orbital public transport routes such as the West London Orbital railway scheme to provide realistic alternatives to travelling by car
- c) Reduce the risk of flooding from the River Brent and its tributaries and other sources by putting the right development in the right places and reducing surface water run-off and potable water use
- d) Provide a safe and inclusive environment around Wembley Stadium and Wembley Arena to support their iconic status for positive memories to be made
- e) Continue to support Brent's award winning street tree planting initiatives and greening of the built environment to combat air pollution, flooding, overheating and threats to ecological habitats

Delivering the homes to meet Brent's needs

- a) Housing delivery will be maximised, with sufficient planning permissions to support delivery of on average 2038 homes a year in the period to 2041 to meet principally Brent's housing needs but also those of wider London;
- b) Providing new homes in truly mixed, inclusive communities across a range of tenures, maximising the provision of affordable homes with a particular emphasis on social rented properties, but also more affordable home ownership and improved opportunities for higher quality market rented properties;
- c) Providing new family housing with at least 25% of new homes being 3 bedrooms or more, recognising that Brent's suburban context provides opportunities for houses as well as flats;
- d) Meeting the growing need for specialist housing such as the 230 homes for older people per year to accommodate Brent's ageing population and others with challenges who may require additional support.

5.4. The objectives were tested against the IIA framework to determine how compatible they are with the principles of promoting sustainable development, taking into environmental, social and economic conditions.

Strong and Inclusive Communities																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
A	++	+	n/a	+	+	+	n/a	+	n/a	n/a	+	n/a	++	+	+	+	+	+	n/a	+	+	+	+	+
B	+	n/a	n/a	n/a	n/a	++	n/a	+	n/a	n/a	n/a	n/a	+	++	+	n/a	n/a	n/a	n/a	+	+	+	+	?
C	+	n/a	++	n/a	+	+	++	+	-	n/a	n/a	n/a	n/a	+	+	n/a	n/a	n/a	n/a	+	++	++	++	++
D	+	n/a	n/a	+	n/a	++	+	+	n/a	n/a	n/a	n/a	+	++	+	n/a	n/a	n/a	n/a	+	n/a	+	+	?

These objectives build on the London Plan policy of the same name. Taking account of this policy too when considering its impacts in relation to the IIA objectives, it is clear that whilst for each of the particular local areas of emphasis have differing impacts, none are adverse and where relevant they are positive or very positive in terms of outcomes. The social and economic elements are more relevant to all of the criteria, with the exception of priority a) which is based on prioritising development in certain areas, which is also likely to lead to environmental benefits in those areas.

On age, race and sexual orientation, disability, pregnancy and maternity, sex, marriage and civil partnership, gender reassignment and religion and belief the policy will have benefits to those with a protected characteristic. This good growth policy builds on that of the draft London Plan, which in itself specifically makes reference to “support and promote the creation of an inclusive London where all Londoners, regardless of their age, disability, gender, gender identity, marital status, religion, sexual orientation, social class, or whether they are pregnant or have children, can share in its prosperity, culture and community, minimising the barriers and challenges and inequalities”.

Making the best use of land																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
A	n/a	n/a	++	+	n/a	n/a	+	++	?	-	?	+	++	?	+	+	+	?	+	++	+	++	+	++
B	n/a	n/a	+	n/a	+/-	n/a	+	++	?	-	++	+	+	?	++	+	+	+	+	++	+	++	+	++
C	n/a	+	n/a	+	n/a	n/a	+	?	n/a	+	?	++	+	n/a	?	n/a	?	++	n/a	n/a	n/a	n/a	+	+
These objectives are based on encouraging the better use of land to meet identified needs, for housing, jobs and social infrastructure. This supports higher density development, thus improving opportunities to reduce the need to travel and provide critical mass of population to																								

These objectives are based on encouraging the better use of land to meet identified needs, for housing, jobs and social infrastructure. This supports higher density development, thus improving opportunities to reduce the need to travel and provide critical mass of population to

support local services and also recognised features of local importance such as town centres. In Brent the emphasis is on areas which also have higher levels of recognised deprivation to better ensure local residents benefit from development. The policy seeks to ensure that positive places/ townscape is protected/ enhanced whilst less well performing areas are priorities for development. The policy by reusing brownfield land also gives greater potential to ensure that open space is protected, but also better used due to increased population. The better use of land will also reduce opportunities for crime to occur by giving more opportunities for places to have better natural surveillance. On the majority of impacts identified in relation to the IIA objectives the impacts are positive or very positive. Where impacts are not so clear is focused on a range of environmental objectives, such as waste management.

On age, race and sexual orientation, disability, pregnancy and maternity, sex, marriage and civil partnership, gender reassignment and religion and belief the policy will have benefits to those with a protected characteristic. This good growth policy builds on that of the draft London Plan. The focus on Growth Areas is more likely to benefit those with a protected characteristic that is more likely to make them be at risk of being deprived as they are more likely to be congregated in these areas, e.g. black and ethnic minority groups who are more likely to be in low paid work or unemployed and therefore live in public sector or cheaper rented accommodation which is more prevalent in these areas.

Creating a Healthy Borough

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
A	n/a	++	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	+	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	+	n/a	+
B	+	++	n/a	+	n/a	+	+	++	n/a	n/a	++	n/a	++	n/a	++	+	?	++	+	+	+	++	+	++
C	+	++	+	+	n/a	n/a	+	n/a	n/a	n/a	+	n/a	+	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a	+	n/a
D	+	++	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	++	+	n/a	n/a	n/a	+	n/a	+	+	n/a	++	+

These **objectives** are based on ensuring that health needs are met directly through health care provision but also through creating an environment which creates healthier people who are therefore much less likely to call upon measures to deal with poor health symptoms. In relation to places this will be though promoting healthy streets, good access to public transport, open spaces, etc., but also developing in areas where the local population is more deprived and therefore potentially better able to benefit from new development. The integration of green space and bio-diversity into development and people's every-day lives will also assist with this. Overall where impacts have been identified in relation to the objective they have been positive across the whole range of social, environmental and economic.

On age, race and sexual orientation, disability, pregnancy and maternity, sex, marriage and civil partnership, gender reassignment and religion and belief the policy will have benefits to those with a protected characteristic. This good growth policy builds on that of the draft London Plan. The focus on new development in Growth Areas is more likely to benefit those with a protected characteristic that is more likely to make them be at risk of being deprived. This is as these groups are more likely to be congregated in these areas, e.g. black and ethnic minority groups who are more likely to be in low paid work or unemployed and therefore live in public sector or cheaper rented accommodation which has a higher prevalent in these areas.

Growing a Good Economy																								
I/A Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
A	n/a	n/a	+	+	n/a	+	+	+	?	n/a	?	+	+	+	++	+	++	+	+	++	++	++	+	++
B	n/a	n/a	+	+	n/a	+	++	+	+	n/a	+	n/a	+	++	+	n/a	n/a	n/a	n/a	++	++	++	n/a	++
C	n/a	n/a	n/a	n/a	+/-	+	+	n/a	n/a	n/a	-	n/a	+	++	+	n/a	n/a	n/a	n/a	++	++	++	n/a	+

These objectives are based on ensuring that the economy in Brent helps with the prosperity of the local population and provides better paid and more fulfilling. A key element will be using mixed use development to encourage greater investment through re-provision of employment space, which historically in Brent has realistically suffered from underinvestment. This will assist in attracting and meeting for growth sector industries/ employers who will be looking for higher quality space. Promoting Brent's town centre's will ensure continued local facilities for residents to better help meet their needs but also in relation to the night time economy draw additional people into the borough. Overall where impacts have been identified in relation to the objective they have been positive across the whole range of social, environmental and economic. An uncertain element is the potential for impact on crime associated with the night time economy. This will require co-ordination between planning, licensing, police and other regulatory measures such as waste management.

On age, race and sexual orientation, disability, pregnancy and maternity, sex, marriage and civil partnership, gender reassignment and religion and belief the policy will have benefits to those with a protected characteristic. These objectives build on that of the draft London Plan policy of the same name. The focus on new development in Growth Areas is more likely to benefit those with a protected characteristic that is more likely to make them be at risk of being deprived. This is as these groups are more likely to be congregated in these areas, e.g. black and ethnic minority groups who are more likely to be in low paid work or unemployed and therefore live in public sector or cheaper rented accommodation which has a higher prevalent in these areas.

Increasing Efficiency and Resilience																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
A	+	+	n/a	+	n/a	n/a	n/a	n/a	+	+	+	+	n/a	n/a	++	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
B	+	+	n/a	+	n/a	n/a	+	++	n/a	+	++	+	+	n/a	++	n/a	n/a	n/a	n/a	n/a	+	++	n/a	++
C	n/a	+	+	+	n/a	n/a	n/a	n/a	n/a	++	?	+	+	n/a	n/a	++	+	n/a	++	n/a	n/a	n/a	n/a	n/a
D	+	n/a	n/a	+	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	++	+	n/a	n/a	n/a	n/a	n/a	+	n/a	+	n/a	n/a
E	n/a	+	n/a	+	n/a	+	n/a	+	n/a	++	++	++	++	+	++	++	++	++	++	n/a	n/a	++	n/a	n/a
These objectives are based on increasing efficiency and resilience in Brent. Key elements of achieving this will be to reduce carbon emissions through a variety of means, including supporting the expansion of local and renewable energy systems; tackling congestion and thereby improving air quality by providing realistic alternatives to travelling by car; reducing flood risk by ensuring the right development is put in the right places and reducing fluvial/surface water run off risk and potable water use; ensuring that a safe and inclusive environment around Wembley Stadium and Wembley Area is provided; and ensuring the continuation of support of Brent’s tree planting initiatives and greening of the build environment. Together, these objectives will help to combat air pollution, flooding, overheating and threats to ecological habitats. Overall, where impacts have been identified, these are positive across social, environmental and economic criteria, but particularly in relation to environmental criteria.																								
On age, race and sexual orientation, disability, pregnancy and maternity, sex, marriage and civil partnership, gender reassignment and religion and belief the policy will have benefits to those with a protected characteristic. These objectives seek to ensure that Brent is increasingly efficient and resilient as a borough. This will be of benefit to all residents, and as such, all protected groups. However, this policy is likely to have particularly positive impacts on the groups of pregnancy and maternity, age, and disability, as those groups may be particularly vulnerable to the impacts of not reducing congestion, improving air quality and providing safe and inclusive environments.																								

Delivering the homes to meet Brent's needs

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
A	+	+	+	?	?	?	+	-	-	?	?	?	?	?	-	?	?	+	+	+	+	++	+	?
B	+	++	++	+	n/a	+	n/a	+/-	-	?	?	?	?	?	?	?	?	n/a	n/a	++	+	++	+	?
C	++	++	++	+	n/a	+	n/a	-	-	?	-	?	?	?	?	?	?	n/a	n/a	+	+	+	n/a	n/a
D	++	+	++	+a	n/a	+	n/a	n/a	-	?	-	?	?	?	?	?	?	n/a	n/a	+	+	+	n/a	n/a

The objective is based on ensuring that Brent is better to meet its own and also London's housing needs. This includes providing for an increase in housing numbers across the Local Plan timescale, providing homes in mixed communities, whilst meeting a need for a range of tenures, ensuring that family homes are provided and also that older people's needs are better met. The range of interventions impact across the range of social, environmental and economic objectives. The impacts are relatively balanced in terms of number between the positive or very positive and the unknown. There is some negative element in relation to waste and (air) pollution. The benefits of the housing policies are particularly based around the social and economic element. This is because people will be better able to meet their housing needs and as this is such a fundamental part of a person's life, it has many impacts. The benefits also relate to economic objectives including the investment and ability to find work/ better skills. Most of the uncertain elements are based around the environment and will have to be addressed elsewhere in the Plan by other policies. E.g. the need to find space for homes will lead to pressure to develop sites in other use, this will require policies to protect these uses if needed, or ensure that they are re-provided.

On age, race and sexual orientation, disability, pregnancy and maternity, sex, marriage and civil partnership, gender reassignment and religion and belief the policy will have benefits to those with a protected characteristic. This good growth policy builds on that of the draft London Plan. The focus on building more homes and homes that better meet needs is more likely to benefit those with a protected characteristic that is more likely to make them be at risk of being deprived, e.g. black and ethnic minority groups and the disabled who are more likely to be in low paid work or unemployed and therefore live in public sector or cheaper rented accommodation, or not afford any accommodation. In addition, it will benefit the young whose life chances will be improved if they are living in over-crowded accommodation and able to move to a home that better meets their needs. The same is true of older people, or those with supported housing needs.

5.5. The above assessment demonstrates that in general, the implementation of the Local Plan objectives will achieve positive outcomes, and are in general conformity with the IIA objectives. In particular, there are significant positive impacts in relation to housing, economic regeneration and health and well-being.

6. Publication Stage Policies and Reasonable Alternatives Appraisal

6.1. The results from the appraisal of the publication stage policies and reasonable alternatives against the IIA framework are detailed below.

Design

Policy: POLICY DMP1: DEVELOPMENT MANAGEMENT GENERAL POLICY																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+
There are no anticipated negative impacts associated with the implantation of this policy.																								
This policy should serve to positively impact all criteria, including: social inclusion, health, housing, quality of surroundings, crime, community identity, accessibility, traffic, waste management, resources, environmental health, biodiversity, townscape, heritage, climate change mitigation and adaption, soil, open space, flooding, regeneration, employment, education, and efficient infrastructure. By addressing all of these needs within one policy it encourages their consideration as a more holistic approach, enabling benefits to be sought from alternate avenues, enhancing the provision and integration of infrastructure which meets a wide array of needs. On age, race and sexual orientation, disability, pregnancy and maternity, sex, marriage and civil partnership, gender reassignment and religion and belief the policy will have benefits to those with a protected characteristic. The policy supports proper consideration to a wide range of factors that support delivery of development that best meets the needs of the whole community and takes into account the needs of those with protected characteristics. For example, the policy seeks to ensure that development is satisfactory in terms of means for access for all (which will benefit those with limited mobility) and ensures high levels of internal amenity which is regarded as essentially meeting the needs of its occupants. Where these occupants have special needs, it would be expected that the design and layout of the property would meet these needs. This is a high level policy and matters such as requirements specifically around access within the home are addressed by other policies (for example, the London Plan, housing policies). This policy also seeks to ensure that residents do not have unacceptable increased exposure to flood risk, noise and air quality (which will be beneficial to everyone). Other key elements are ensuring necessary social and physical infrastructure and no loss of community facilities.																								
Policy Alternative: No policy.																								

I/A Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
It is not anticipated that this policy will provide any positive impacts. This policy will likely impact the following criteria negatively: social inclusion, health, housing, quality of surroundings, crime, community identity, accessibility, traffic, waste management, resources, environmental health, biodiversity, townscape, heritage, climate change mitigation and adaption, soil, open space, flooding, regeneration, employment, education, and efficient infrastructure. Although these criteria are all likely to be covered in detail in National Planning Policy, the London Plan, and the Local Plan, the policy provides stakeholders with a general overview of all the criteria with which they should concern themselves should they wish to involve themselves in the regeneration of the borough. This allows for a more successful planning system whereby a greater percentage of applications are granted, helping to increase developer interest and associated redevelopment within the borough. On age, race and sexual orientation, disability, pregnancy and maternity, sex, marriage and civil partnership, gender reassignment and religion and belief a lack of policy could have negative impacts to those with a protected characteristic. A lack of policy might reduce the proper consideration of some factors that support delivery of development that best meets the needs of the whole community and takes into account the needs of those with protected characteristics. Although the policy is helpful in bringing together a range of issues that need to be addressed by development policies in the London Plan are likely to sufficiently address most of the points of DMP1. As such there are not likely to be any significant differences between this scenario and having the policy. Conclusion: The proposed policy is seen as the most appropriate and should provide positive benefits across the board. It is important for potential stakeholders to understand what consideration is required when putting forward a development proposal. Therefore, this policy serves to provide a general overview of considerations, acting to increase application success rates, increasing council efficiency and developer interest.																								

Policy BP1: Central																								
I/A Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	++	+	++	+	0	++	+	+	-	+	-/+	++	+	+	0	0	+	++	+	+	++	++	0	+

Social impacts are considered to be positive. The policy will encourage prosperity, will improve health and wellbeing by way of protecting and enhancing access to open space and leisure facilities and will help to provide everybody the opportunity to live in a home which is suitable to their needs by way of providing approximately 15,000 new homes. This will contribute towards providing a high quality environment for residents to live and work in and will enhance community identity by of encouraging the securing of provision for needs arising from new housing development.

Environmental impacts are considered to be predominantly positive. There may be some slight negative impacts in terms of increased production of waste which is associated with increased development, and potential for some increased noise and light pollution. However, the positive impacts will include an increased provision of open space, an enhanced landscape and townscape and the reduction of the effect of traffic on the environment by way of promoting sustainable modes of transport through promoting access by public transport, bicycle or on foot.

Economic impacts are considered to be positive. The policy will promote sustainable resilient and inclusive economic growth, will increase opportunities for everybody to access rewarding and satisfying employment, and will facilitate both indigenous and inward investment in the borough by way of introducing a greater proportion of employment floorspace in new mixed-use developments on Watkin Road and First Way, and increasing the supply of modern, affordable workspace developments for the arts and creative industries.

Due to the policy being of benefit to all residents, it is considered that there will be a positive impact on the following groups: age, sex, sexual orientation, gender reassignment, disability, religion and belief, ethnicity, marriage and civil partnership, pregnancy and maternity. In relation to disability, although the policy encourages car free access and lower parking provision, policies in relation to parking (Appendix 4 of the Local Plan, and London Plan policy) will apply, and therefore parking standards for those with a disability will accord with London Plan policy. This will ensure that there will be no negative impacts on this protected characteristic.

Conclusion: The proposed policy will result in positive economic, social and environmental impacts that will ensure that good growth takes place in the Central place of Brent.

Policy BP2: East																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	+	+	0	++	+	++	-	+	+/-	+	+	+	0	0	+	+	+	++	+	++	+	+
Social impacts are considered to be positive. Social inclusion will be increased and opportunities will be provided for everybody to live in a home which his suitable to their identified need through the potential residential development for Staples Corner Growth Area and Neasden Station's Growth Area, taking into account potential specific requirements around different housing types, such as specialist (older people / supported / student) housing and build to rent. Community identity will be supported through securing the retention of the area's religious buildings.																								
Environmental impacts are considered to be positive. Attractive and clean environments will be enhanced through conserving and enhancing heritage assets such as Church Lane and Neasden Conservation Areas and improvements to public realm and connectivity in the town centres. The environment and open spaces will be enhanced through supporting the contribution of high quality open spaces and wildlife corridors, including maintaining and enhancing existing parks and groups and tree planting and associated landscaping around the North Circular Road / A5, and others.																								
Economic impacts are considered to be positive due to encouraging efficient infrastructure to support economic growth by safeguarding land for the West London Orbital (WLO) Route and associated infrastructure and reducing traffic dominance on the A5 corridor and North Circular Road. Creation of high quality pedestrian connections from Brent Cross West Thameslink station to Staples Corner will reduce traffic dominance. Any new stations delivered as part of the WLO would have lift access, which would have positive impacts on protected groups with limited mobility, such as disability, age, and pregnancy and maternity. The policy also increases employment opportunities through supporting any additional small scale retail / other uses floorspace and retaining and encouraging intensification of employment uses at Kingsbury LSIS. In combination with other policies (e.g. BE1 – Economic Growth and Employment Opportunities for All – which seeks to secure Employment, Apprenticeship and Training Plans as part of developments of 3,000sqm or more), this could be particularly beneficial to particular under-represented protected groups (e.g. women, disabled people, BAME groups).																								
Due to the policy being of benefit to all residents, it is considered that there will be a positive impact on the following groups: age, sex, sexual orientation, gender reassignment, disability, religion and belief, ethnicity, marriage and civil partnership, pregnancy and maternity. In particular, in relation to disability, directing development towards public transport corridors and safeguarding land for the WLO route is likely to have positive impacts in terms of accessibility.																								

Conclusion: The proposed policy will result in positive economic, social and environmental impacts that will ensure that good growth takes place in the East place of Brent.

Policy BP3: North																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	+	+	0	+	+	+	-	0	+/-	+	+	+	0	0	+	+	?	++	+	++	+	+
Social impacts are considered to be positive. The policy supports the continued residential development in the Burnt Oak and Colindale Growth Areas, which will encourage prosperity. Additionally, the policy will secure sufficient physical and social infrastructure to support the increase in population which will promote social inclusion and help to narrow inequalities within the borough. The policy will also improve health and wellbeing through identifying opportunities for a new leisure facility incorporating swimming pool provision and improve the quality of strategic sports hall sites. Environmental impacts are considered to be positive. The policy will help to enhance and maintain attractive and clean environments and to protect and enhance the historic environment by way of conserving and enhancing designated heritage assets in the area, and ensuring that development respects the predominantly suburban low rise character of the area. The policy also supports improvements to public realm, building upgrades and shop façade improvements in Colindale / The Hyde and Burnt Oak. The policy supports enhancements to open spaces ad creation of new public spaces, and aims to reduce traffic dominance and enhance A5 corridor, which will improve environmental health. Although the policy seeks to reduce traffic dominance, this will not have a negative impact on those who are reliant on cars (e.g. those with a disability) as higher car parking standards will still apply in areas with low PTAL ratings. Additionally, the policy aims to reduce traffic dominance partly through the creation of new cycling links between key destinations – by offering a greater variety of choice in how residents travel between key destinations, traffic dominance may be reduced, therefore leading to a positive impact on those who are still required to drive due to limited mobility. Economic impacts are considered to be positive. The co-location of Capitol Valley and Honeypot Lane LSIS will help to facilitate both indigenous and inward investment in the borough. Residential development within various locations at Kingsbury town centre will help to support its vitality and viability, and an increased net provision of comparison and convenience goods floorspace, directed towards the town centres will contribute towards the employment offer in the borough.																								

Due to the policy being of benefit to all residents, it is considered that there will be a positive impact on the following groups: age, sex, sexual orientation, gender reassignment, disability, religion and belief, ethnicity, marriage and civil partnership, pregnancy and maternity.

Conclusion: The preferred policy will result in positive economic, social and environmental impacts that will ensure that good growth takes place in the North place of Brent.

Policy BP4 – North West

I/A Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	++	+	+	0	0	+	+	-	0	+/-	+	+	+	0	0	+	++	?	+	+	+	0	+

Social impacts are considered to be positive. Housing delivery (being able to provide everybody with the opportunity to live in a home which is suitable to their identified needs) will be increased through the provision of approximately 2600 new homes including specialist accommodation to meet identified demand, and delivery of mixed-use development on the Sainsbury's Kenton Road site. Health and wellbeing will be enhanced through the protecting and enhancing playing pitch provision and encouraging community use of Byron Court Primary School's sports facility and improvements to the university hospital.

Environmental impacts are considered to be predominantly positive. The policy will result in an improved setting of and better integration of open space within the site to Northwick Park, and will result in enhanced landscape and townscape through continuing to conserve and enhance designated heritage assets and protecting where possible the established metro-land characteristics of the place. Biodiversity will be conserved and enhanced through protecting and enhancing wildlife corridors and pursuing opportunities to create a local nature reserve at Ducker Pool. Improvements to Northwick park station and implementation of cycle ways will reduce traffic.

Economic impacts are considered to be positive. The policy supports provision of enhanced or redeveloped university facilities, the creation of new convenience floorspace, and the retention and intensification of SIL Land at East Lane Business Park.

Due to the policy being of benefit to all residents, it is considered that there will be a positive impact on the following groups: age, sex, sexual orientation, gender reassignment, disability, religion and belief, ethnicity, marriage and civil partnership, pregnancy and maternity.

Conclusion: The preferred policy will result in positive economic, social and environmental impacts that will ensure that good growth takes place in the North West place of Brent.

Policy BP5 – South

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	+	+	0	+	+	+	-	0	+/-	+	+	+	0	+	+	+	+	+	+	+	0	+

Social impacts are predominantly positive. The policy proposes the extension of Church End Growth Area to include adjoining industrial sites to provide a mixed use neighbourhood, which will encourage prosperity and increase housing delivery. Church End town centre is also to provide a market for local communities, which will support social inclusion and community identity, and a new space within Church End Growth Area will serve as an employment, community and health hub, supporting health and wellbeing.

Environmental impacts are predominantly positive. The policy proposes the conserving and enhancing of heritage and cultural assets and their setting, in particular that of Neasden Temple and Harlesden Conservation Area. This will help to maintain an attractive and clean environment and protect and enhance historic environments and cultural assets. Environmental enhancements will reduce flood risk, and enhancements to open space and prioritising tree planting in areas of poor air quality, particularly along the North Circular Road, will promote climate change adaption.

Economic impacts are predominantly positive. The policy supports the engaging with the community of St Raphael's Estate to develop a strategy as a potential area of change, to deliver more homes, thereby supporting resilient and inclusive economic growth. The policy also aims to protect and enhance Harlesden town centre's retail and evening economy, including new convenience and comparison retail floorspace, supporting the local economy. Co-location of employment and residential uses at Church End LSIS, and encouragement of intensification of employment uses at Brentfield LSIS will facilitate both indigenous and inward investment within the borough. As will supporting the establishment of new Creative Quarters at Harlesden. A new 6th form entry secondary school and college will help to maximise education and skills.

Due to the policy being of benefit to all residents, it is considered that there will be a positive impact on the following groups: age, sex, sexual orientation, gender reassignment, disability, religion and belief, ethnicity, marriage and civil partnership, pregnancy and maternity.

Conclusion: The preferred policy will result in positive economic, social and environmental impacts that will ensure that good growth takes place in the South place of Brent.

Policy BP6 – South East																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	+	+	0	+	+	+	-	0	+/-	+	+	+	0	+	+	+	?	+	+	+	+	+
Social impacts are considered to be predominantly positive. The policy promotes the delivery of 3400 high quality new homes in South Kilburn Growth Area, with a target of 50% affordable housing including social rented for existing secure tenants of South Kilburn. This will help to ensure that everybody is provided with an opportunity to live in a home which is suitable to their identified needs. The policy also promotes the securing of infrastructure in South Kilburn, including a new community space and enhancement and protection of leisure provision and playing pitches. This will increase community cohesion and health and wellbeing.																								
Environmental impacts are considered to be predominantly positive. Safeguarding land for the West London Orbital Route well help to ensure that traffic can be reduced in the future. The enhancement of cycle links and to open space will also create beneficial environmental impacts.																								
Economic impacts are considered to be predominantly positive. The policy proposes to protect and enhance the Queen’s Park Creative Quarter and South Kilburn Enterprise Hub, and to enhance and protect Kilburn Town Centre’s evening economy, which together will promote and protect employment opportunities.																								
Due to the policy being of benefit to all residents, it is considered that there will be a positive impact on the following groups: age, sex, sexual orientation, gender reassignment, disability, religion and belief, ethnicity, marriage and civil partnership, pregnancy and maternity.																								
Conclusion: The preferred policy will result in positive economic, social and environmental impacts that will ensure that good growth takes place in the South East place of Brent.																								

Page 9 of 10

Policy BP7 – South West																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	+	+	0	+	+	+	-	0	+/-	+	+	+	+	0	+	+	?	+	+	+	+	+
Social Impacts are considered to be predominantly positive. The policy supports a residential-led mixed use development within the Wembley and Alpertown Growth Areas, the Ealing Road and Sudbury town centres and intensification corridors, which will help to encourage prosperity and increase housing delivery. The policy also proposes to meet social infrastructure requirements by securing provision for needs arising from new housing development, especially the provision of new education, health and community facilities, which links into health and wellbeing and social inclusion. Environmental Impacts are considered to be predominantly positive. The policy proposes to conserve and enhance heritage assets, including the Shree Sanatan Hindu Mandir on Ealing Road and the listed buildings and gardens of Barham Park. The policy also promotes the creation of high quality open space as part of major developments, to be accessible to both new and existing communities, and prioritising public transport use and associated improvements in the Alpertown and Wembley Growth Areas. Economic impacts are considered to be predominantly positive. The policy encourages the intensification of existing SIL and LSIS sites around Alpertown, which will support investment in the borough, and also proposes to increase the supply of workspace in Wembley and Alpertown, including affordable workspace, which will promote employment opportunities. Although the policy seeks to prioritise public transport use, this will not have a negative impact on those who are reliant on cars (e.g. those with a disability) as disabled parking standards in the London Plan will still apply. Additionally, by offering a greater variety of choice in how residents travel through the area, traffic dominance may be reduced, therefore leading to a positive impact on those who are still required to drive due to limited mobility. Due to the policy being of benefit to all residents, it is considered that there will be a positive impact on the following groups: age, sex, sexual orientation, gender reassignment, disability, religion and belief, ethnicity, marriage and civil partnership, pregnancy and maternity.																								
Conclusion: The preferred policy will result in positive economic, social and environmental impacts that will ensure that good growth takes place in the South West place of Brent.																								

POLICY BD1: LEADING THE WAY IN GOOD URBAN DESIGN																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	n/a	+	+	+	+	+	n/a	n/a	+	n/a	+	+	+	+	n/a	n/a	n/a	+	n/a	+	n/a	n/a
Social impacts are overall considered to be positive. Good design will contribute towards ensuring that places function well, and that spaces around buildings contribute towards the public realm and community wellbeing. Good design will help ensure that people are put first, that health is promoted and that people feel safe and enjoy where they live, work, or visit. This links into promoting social inclusion, health and wellbeing, quality of surroundings, preventing crime and enhancing community safety, community identity and accessibility. Environmental impacts are overall considered to be positive. High quality design will not only be visually interesting, but will enhance local character. High quality design will also help to enhance landscape and townscapes and enhance historic environments and cultural assets, and potentially mitigate and adapt to the impacts of climate change. Ensuring that places function well may reduce traffic by reducing the need to travel, and may help to minimise noise and light pollution. Economic impacts are overall considered to be positive. High quality design will help to facilitate both indigenous and inward investment in the borough, as businesses may be more likely to utilise buildings which function well and where people feel safe to visit. Additionally, high quality design is more likely to be appreciated by future generations, and be sustainable, resilient and inclusive in terms of economic growth. It is considered that there will be a positive impact on all of the protected groups: age, race, religion and belief, disability, pregnancy and maternity, marriage and civil partnership, gender reassignment, gender reassignment and sexual orientation. In relation to disability, the policy requires development to meet requirements within London Plan design policies and Brent Design Guide SPD1. Brent Design Guide SPD1 requires routes and spaces intended for the public to be open, public and fully accessible, while larger development sites should facilitate ease of movement and access for all. However, it is considered that all residents will benefit from a safe and welcoming local environment.																								

Conclusion: The proposed policy should provide benefits across the board by ensuring that buildings are of high quality and will be appreciated by future generations. High quality design is both visually interesting and will enhance local character. Additionally, good design will positively impact how places function and how the spaces around buildings contribute towards public realm and community wellbeing. Good design will therefore ensure that people feel safe and welcome, promoting health and wellbeing.

POLICY BD2: TALL BUILDINGS IN BRENT

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	0	0	+	+	0	0	+	+	0	0	0	0	+	+	0	0	0	0	0	0	0	0	0	0

The policy will have minor positive impacts in relation to housing, quality of surroundings, town centres, traffic, and townscape and to heritage and cultural assets. The policy seeks to ensure that tall buildings are placed in the right location. Tall buildings will allow for increased densities in some areas and therefore provide the opportunity to better meet housing targets/ address needs. Placing the buildings in the right locations should maintain or enhance the majority of the townscape and quality of surroundings. Town centres are prioritised locations for taller buildings, so this should encourage better use of town centres. The prioritisation of taller buildings in areas with good public transport should reduce traffic. The placement of tall buildings in an appropriate context should ensure high quality environments are maintained and the appearance of the borough is maintained/ enhanced.

The policy will have neutral impacts on social inclusion, population diversity/ culture, health, homes that meet needs, community safety, accessibility, waste, bio-diversity and open spaces, water, soil, greenhouse gas emissions, climate change, flood risk, education and skills, infrastructure, growth and regeneration and investment and employment. Ensuring that tall buildings are located in the right places – such as within town centres – will help to ensure that services are accessible to all. Tall buildings have historically been associated with a number of adverse impacts and sometimes had negative connotations particularly in terms of their social outcomes for poorer households, related to social inclusion, isolation, lack of facilities and an increased perception of crime. Often this was related to their wider inclusion in predominantly poorly designed single tenure estates. More recently taller buildings have predominantly been market orientated, with a focus on smaller dwelling sizes in which families are not concentrated. They have better management of communal facilities, services and spaces which will remove some of the more negative outcomes that would have arisen previously. The identification of some areas as being appropriate for taller buildings will allow additional homes to be built to meet overall needs which will have positive impacts if people otherwise would not be able to access homes to meet their needs which would otherwise bring negative impacts. The policy for the most part however has a selective approach to the provision of taller homes, as such it is considered that overall the impact is likely to be neutral.

On age, race, sexual orientation, disability, pregnancy and maternity, sex, marriage and civil partnership, gender reassignment and religion and belief the policy is likely to have a neutral impact on those with a protected characteristic compared to the rest of the population. The policy identifies areas appropriate for tall buildings, this in itself is unlikely to significantly impact on those with protected characteristics, but is an important part of a wider strategy of seeking to deliver sufficient homes that meet the needs of residents. Other policies elsewhere in the plan consider impacts in relation to the total number of homes being delivered and in relation to accessibility – for example, BD1 requires good design, and the Brent Design Guide SPD1 requires new development to provide adequate space, access and orientation, while adhering to the relevant space standards.

Policy Alternative: To identify that no areas are acceptable for tall buildings.

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	0	+	0	0	0	0	-	0	0	0	0	0	0	-	-	0	0	0	0	0	0	0	0	0

The policy will have minor positive impacts in relation to health and well-being. The policy would not allow for tall buildings in any locations. This would potentially have minor impacts on health as generally people have higher levels of satisfaction with low to mid-rise development which is more of a human scale, whilst tall buildings can create an oppressive, closed in environment.

The policy would have minor negative impacts in relation to town centres/ accessibility, traffic and greenhouse gas emissions. The main negatives of no tall buildings would be associated with the reduction in densities that could occur in places with good accessibility to services and public transport, with the associated impacts on greenhouse gases associated with an increased reliance on the private car for journeys.

The policy will have neutral impacts on social inclusion, housing, quality of surroundings, community safety, population diversity, waste, culture, health, homes that meet needs, bio-diversity and open spaces, water, townscape, climate change, soil, flood risk, cultural assets, education and skills, infrastructure, growth and regeneration and investment and employment. It is assumed that housing numbers would need to still be delivered in an alternative form to tall buildings.

With regards to age, race, sexual orientation, disability, pregnancy and maternity, sex, marriage and civil partnership, gender reassignment and religion and belief, not having any areas within which tall buildings would be acceptable is likely to have a negative impact, particularly on those who may not be able to compete in the market and are more reliant on affordable housing

(old, young and disabled). Not having any areas which are appropriate for tall buildings would undermine an important part of a wider strategy of seeking to deliver sufficient homes that meet the needs of residents. These specific impacts have been assessed elsewhere in relation to those policies, e.g. total number of homes to be supplied.

Policy Alternative: To identify that tall buildings are likely to be acceptable throughout the borough.

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	-	-	-	-	-	-	-	-	-	+	-	-	-	0	+	+	0	0	0	0	0	-

The policy will have positive impacts in relation to: biodiversity; land and soil; and open space. Identifying that tall buildings are likely to be acceptable through the borough will have some positive impacts. Such impacts include the increased likeliness of the development of more, high density tall buildings, which will require fewer sites to help achieve the borough's housing targets. This approach will alleviate pressure on other sites, freeing up land otherwise allocated for development, including greenfield sites. Reduced development of greenfield sites will potentially increase biodiversity and soil conservation and increase the quantity of open spaces.

The policy approach will have negative impacts in relation to: social inclusion; health; housing; quality of surroundings; community safety; accessibility; traffic; waste management; water quality and resources; environmental health; townscape and landscape; heritage; climate change mitigation; and efficient infrastructure. This policy will likely lead to the development of higher levels of tall buildings, developed in inappropriate areas with low PTAL, increasing population densities in areas lacking sufficient infrastructure to cope. This will reduce people's immediate accessibility to essential services such as healthcare facilities and will cause the increase in use of personal vehicles, as a means to acquire necessary goods and services and increasing traffic and associated pollution. Development in inappropriate settings which does not reflect local character will diminish the very nature of the area, urban grain, people's sense of place and their pride in the area.

This policy will have neutral impacts on climate change adaption, flood risk, regeneration, employment, investment, and education.

On age, race and sexual orientation, disability, pregnancy and maternity, sex, marriage and civil partnership, gender reassignment and religion and belief the policy is likely to have a neutral impact on those with a protected characteristic compared to the rest of the population. The policy would allow tall buildings anywhere in the borough. The wording in the policy in itself is unlikely to significantly impact on those with protected characteristics, but is an important part of a wider strategy of seeking to deliver sufficient homes that meet the needs of residents. In theory the provision of any site for a tall building could increase housing numbers sufficiently to meet needs. This

relationship is not however linear and the benefits might not necessarily pass through to those with protected characteristics as tall buildings due to economics do not always provide more affordable housing. As identified it might also locate buildings in areas without good access to public transport and services, thus adversely impacting on those who rely on public transport, or walking to local facilities. The specific impacts of providing more or less housing on those with protected characteristics been assessed elsewhere in relation to those policies, e.g. total number of homes to be supplied.

Conclusion: The proposed policy is seen as the most appropriate for Brent, having a number of positive impacts. Tall buildings will be required in order to help meet Brent's housing needs due to the lack of available land. They can however have a number of negative impacts upon a community and therefore require tight control through policy. The proposed policy identifies a number of appropriate sites for the development of tall buildings in order to help meet the boroughs housing requirements and remains sufficiently flexible so as not to remain absolute. The alternative policies provide either too much, or too little control which will serve to negatively affect a number of social, environmental, and economic criteria.

Policy: POLICY BD3: BASEMENT DEVELOPMENT

I/A Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	0	+	+	+	0	0	0	0	-	0	0	+	+	0	0	0	0	0	+	0	0	0	0	0

The policy will have minor positive impacts in relation to health and well-being, housing, quality of surroundings, bio-diversity and open spaces, townscape and to flood risk. The policy recognises the increased demand for basements to meet homeowners' needs in particular and seeks to allow this to happen whilst limiting the potential for significant adverse social and environmental impacts that might otherwise occur without a policy being in place. In relation to health making sure that households are not wholly reliant on the basement for all their living accommodation will reduce potential for adverse impacts re: lack of light and poor outlook and as such is a minor positive. The same is true of people being able to extend their homes so that they better meet their needs. Compared against an absence of policy, the limitation of extent of the allowed basements ensures that there are likely to be minor benefits in terms of the quality of surroundings, townscape and bio-diversity. The policy also seeks to ensure that potential impacts for flooding are addressed at the application stage to protect the occupants and neighbours.

There will be minor adverse impacts on waste production. The policy prevents extensive excavation which would further increase waste arising than the policy allows, but as basements usually involve the removal of significant volumes of soil under existing buildings what it allows will still have a minor negative impact.

The policy will have neutral impacts on social inclusion, population diversity/ culture, health, homes that meet needs, town centres, traffic, community safety, accessibility, water, soil, greenhouse gas emissions, cultural assets, climate change, education and skills, infrastructure, growth and regeneration and investment and employment. The extent of basement activity is likely to remain relatively small in the borough and probably only in very high value areas. As such the impacts are unlikely to be more than minor on many aspects with positive balancing up negatives, e.g. climate change, basements require much embodied energy in terms structural steel and concrete retaining walls, but the underground location can reduce fluctuations in temperature and heating/cooling requirements compared to conventional extensions.

On age, race, pregnancy and maternity and disability the policy is likely to have a positive impact, on sexual orientation, sex, marriage and civil partnership, gender reassignment and religion and belief the policy is likely to have a neutral impact on those with a protected characteristic compared to the rest of the population. The policy provides for basement extensions. This is likely to be positive for those who need to extend their home to meet their needs, this may be for larger families (more prevalent within ethnic minorities) those with small homes but having children, those needing additional room for carers (old and disabled).

Alternative Policy: No policy

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	0	-	-	-	0	0	0	0	?	0	0	?	?	0	0	0	0	0	?	0	0	0	0	0

Not having a policy to manage basement extensions is likely to have a minor negative impact in terms of the social indicators.

The lack of a policy means that there will not be an opportunity to limit the potential for significant adverse social and environmental impacts that might otherwise occur with a policy being in place. This could be due to people not being able to extend their homes to better meet their needs. Alternatively, it may result in households being wholly reliant on a basement for their living accommodation.

The lack of a policy will have uncertain impacts in terms of environmental indicators. There will not be an opportunity to limit the potential for significant adverse environmental impacts that might occur with a policy being in place to prevent such impacts. There will also be uncertain impacts with regards to waste production, as basements usually involve the removal of significant volumes of soil under existing buildings.

The lack of a policy will have neutral impacts in terms of economic indicators.

On age, race, pregnancy and maternity and disability the policy is likely to have a negative impact, on sexual orientation, sex, marriage and civil partnership, gender reassignment and religion and belief the policy is likely to have a neutral impact on those with a protected characteristic compared to the rest of the population. Not having a policy to provide for basement extensions is likely to negatively impact those who need to extend their home to meet their needs, such as larger families (more prevalent within ethnic minorities), those with small homes but having children, and those needing additional rooms for carers (old and disabled). It might also ensure that those with a protected characteristic that results in them being economically disadvantaged will be living in cheaper accommodation that has all its habitable rooms at basement level.

Alternative Policy: Allowing greater extent of basement extensions within the property curtilage

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	0	+	+	-	0	0	0	0	-	0	0	+	+	0	0	0	0	0	+	0	0	0	0	0

The policy will have minor positive impacts in relation to health and well-being, housing and to flood risk. This approach would be a variant on the preferred policy. As such it recognises the increased demand for basements to meet home owners' needs. It seeks to allow larger basements than the preferred policy, limiting some of the potential adverse social and environmental impacts that might otherwise occur without a policy being in place. In relation to health making sure that households are not wholly reliant on the basement for all their living accommodation will reduce potential for adverse impacts re: lack of light and poor outlook and as such is a minor positive. The same is true of people being able to extend their homes so that they better meet their needs. The policy also seeks to ensure that potential impacts for flooding are addressed at the application stage to protect the occupants and neighbours.

There will be minor adverse impacts on quality of surroundings, waste production and bio-diversity and open spaces, townscape. The policy allows for more extensive excavation which would further increase waste arising. As basements usually involve the removal of significant volumes of soil under existing buildings it will have a minor negative impact as basement extensions are not significant in terms of numbers in the borough. Less restriction on the extent of the allowed basements creates a scenario which could well mean minor adverse impacts in terms of the quality of surroundings, townscape and bio-diversity, as there will be less space for green infrastructure and potentially visible changes to the character of the street scene.

The policy will have neutral impacts on social inclusion, population diversity/ culture, health, homes that meet needs, town centres, traffic, community safety, accessibility, water, soil, greenhouse gas emissions, cultural assets, climate change, education and skills, infrastructure, growth and regeneration and investment and employment. The extent of basement activity is likely to remain relatively small in the borough and probably only in very high value areas. As such the impacts are unlikely to be more than minor on many aspects with positive balancing up negatives, e.g. climate change, basements require much embodied energy in terms

structural steel and concrete retaining walls, but the underground location can reduce fluctuations in temperature and heating/cooling requirements compared to conventional extensions.

On age, race, pregnancy and maternity and disability the policy is likely to have a positive impact, on sexual orientation, sex, marriage and civil partnership, gender reassignment and religion and belief the policy is not likely to have a neutral impact on those with a protected characteristic compared to the rest of the population. The policy would provide for much larger basement extensions, meaning that possibly more residents would be able to stay in their existing homes and meet their needs through extending. This is likely to be positive for those who need to extend their home to meet their needs, this may be for larger families (more prevalent within ethnic minorities) those with small homes but having children, those needing additional room for carers (old and disabled).

Conclusion: The Assessment indicates that the preferred policy has slightly more positive impacts than the reasonable alternative of allowing a greater volume of basement development to occur. It allows property owners greater scope for the property to be adapted to meet their needs, whilst balancing that up against the impacts on neighbours, particularly in terms of character and green infrastructure.

Housing

Policy: BH1 INCREASING HOUSING SUPPLY IN BRENT

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	+	?	?	?	?	-	-	?	-	?	?	?	-	-	?	+	+	+	?	+	+	?

Although not exclusively for Brent residents provision of significantly more homes in the borough will have positive impacts in relation to social inclusion, health and well-being, living in a home which needs, open space, flooding, economic growth, indigenous and inward investment, maximise population's economic potential. For example, it will address issues of people being placed in temporary accommodation, overcrowding and accommodation which is too expensive and in some cases eliminates potential available disposable income, with the associated adverse impacts on life chances. This will serve to increase opportunities for those most vulnerable within the borough, acting to reduce any differential between those who share a protected characteristic and those who do not. More homes at more affordable prices will assist the economy by limiting wage inflation, allowing more employees to live nearer to work, support existing and new firms' investment in the area and provide training opportunities/ apprenticeships in the building trade for local people. Wholesale changes to areas through master-planning or appropriate planning permissions should provide more opportunities for provision of more formal open space on current brownfield land covered by buildings. It should allow investment in existing open spaces through developer contributions, which in some cases are under-used and reduce surface water run-off which previously hasn't been controlled to greenfield run-off rates.

Impacts will be uncertain in relation to the environment, community safety, recognising Brent's diversity, the vitality and viability of town centres, bio-diversity, townscape, historic and cultural assets, water quality and resources, flora and fauna, landscape and townscape, historic environment and cultural assets, soil quality, local employment, infrastructure to support growth. The limited availability of land in Brent will however potentially impact in both positive and negative ways, with overall uncertain outcomes in relation to a number of aspects. Whilst the need to build homes will mean investment in the existing built environment, which will be positive in dealing with run-down or derelict sites including those of an historic nature, intensification of land use will result in higher plot ratios. This will increase either buildings' site coverage and/ or heights, reducing space for green infrastructure and potentially increasing perceptions of development not of a human scale and of an increased feeling of enclosure. Whilst interventions such as including on site green infrastructure might overcome some impacts, it is difficult to know whether these will be able to fully compensate for undeveloped space lost. Pressure to use land to a greater extent and the economic value of homes could displace more economically marginal uses, such as cultural assets, or business premises, etc., which might not be overcome by policies which seek to seek re-provision, or new facilities.

It is likely to have adverse impacts on reducing the effect of traffic on the environment, reducing the production of waste, air quality, reducing greenhouse gas emissions and mitigating climate change. Again whilst other policies will help to reduce the potential for adverse impacts, additional housing against a backdrop of overall population growth will probably result in these adverse impacts. Increased traffic is likely as not all development will be in areas with high public transport accessibility, construction is a significant contributor of waste even when reusing properties, homes will require energy to function, even if it is less than traditionally consumed and increased buildings will increase temperatures due to their increased thermal mass.

It is considered that this policy will have a neutral impact on people who have the following protected characteristics compared to the wider population: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation. At a general level the provision of additional homes is more likely to allow those with protected characteristics to better meet their needs, as it will provide more choice and possibly result in reductions in costs of property. This could benefit those with protected characteristics who often do not have the purchasing power of others, but will more likely rely on other policies in the plan to ensure that targeted needs, such as affordable housing, mobility housing, specialist housing and family housing are provided. For those with the protected characteristics of age, pregnancy and maternity and disability, impacts on accessibility and car parking would be considered under other policies (design policies, parking policies, and London Plan policies).

Alternative Policy: No policy																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	-	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	-	?	-	?	-
Impacts are uncertain in relation so social indicators, but are likely to be negative. Not only is not having a policy inappropriate as this would not be in general conformity with the London Plan, not having a policy means that opportunities to provide housing for those in temporary or unsuitable accommodation will not be maximised. Additionally, a lack of a policy means that opportunities will not be maximised to provide affordable housing, or homes to be provided in the right places. Impacts are uncertain in relation to environmental indicators. Without a policy to outline the borough’s approach to the amount of housing to be delivered, it is not possible to determine the impacts on the environment. However, it is possible that not planning for the right homes in the right places would have a negative impact due to increased traffic (if development is located in areas with poor public transport accessibility). Impacts are uncertain in relation to economic indicators. Without a policy to outline the borough’s approach to increasing housing supply, it cannot be determined what the economic impacts would be. However, economic impacts are likely to be negative, as a lack of planning for housing in the right places is likely to increase housing costs, which will increase wage demands, or reduce the opportunity for firms to source local employees, detrimentally impacting on economic investment and promotion of sustainable, inclusive economic growth in the borough. Additionally, a lack of a policy will make it difficult to encourage efficient infrastructure to support economic growth. It is considered that the lack of a policy around increasing housing supply in Brent would have uncertain impacts on all residents. It is possible, however, that this option could detrimentally impact those with protected characteristics who do not have the purchasing power of others and who may be reliant on other policies in the plan to ensure that targeted needs, such as affordable housing and specialist housing are provided. Not having a policy is not considered to be an option, as it would not be in general conformity with the London Plan.																								
Alternative Policy: To achieve a housing target as set out in the draft London Plan																								

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	?	?	?	?	-	+	?	-	-	-	-	-	-	-	-	-	-	-	?	?	+	+	?
Impacts will be positive in relation to social inclusion, accessibility, investment, education. This is primarily due to the provision of more housing which means there will be more investment within the borough, providing more construction related jobs. The increased provision of affordable housing is likely to disproportionately benefit those from certain sub-groups, helping to further level the playing field. The increased housing densities will also increase footfall in town centres, increasing their viability whilst providing greater proximity to social infrastructure. Impacts will be negative in relation to community identity, waste management, water quality, environmental health, biodiversity, landscape and townscape, heritage, climate change mitigation and adaption, land and soil, open space, flood risk. Negative impacts are in regards to increased construction works, having an overall negative impact on the environment due to the increased demand for land that displaces other uses, need for increased resources and increasing pollution. They also relate to the speed and intensity of development, for instance, associated infrastructure such as sewer capacity may not be able to keep pace with development. There would also be an increasing reliance on tall buildings for housing which may focus upon the development of 1 and 2 bed apartments in order to attain housing numbers due to less space being required for their delivery, with associated impacts on health and townscape. More homes mean more waste both in construction and in on-going occupation, more water demand/ waste water, potential sewage overflows. Higher targets will also put greater pressure on existing undeveloped areas within property curtilages, impacting on the quality of the environment/ biodiversity. Impacts will be uncertain with regards to health, housing, quality of surroundings, community safety, regeneration, employment, and infrastructure. It will take a great effort from both councils and developers to achieve the substantially larger housing targets set out in the draft London plan. This may result in neglect of other considerations, or their being outpaced, such as development of supporting infrastructure and better consideration of design. The policy may also result in the reduced diversity of housing type as the focus will be on attaining large quantities of dwellings, which will be best achieved through the provision of smaller, 1 and 2 bed units. This may impact upon the provision of housing for those with specialist needs, potentially exacerbating any inequalities felt by those with particular protected characteristics. Increased densities may also make for greater collaborative efforts and an increase in footfall in town centres, increasing their viability, whilst improved activity may reduce the fear of crime, the increased number of people might increase actual incidences of crime.																								

It is considered that this policy will have a neutral impact on people who have the following protected characteristics compared to the wider population: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation. At a general level the provision of additional homes is more likely to allow those with protected characteristics to better meet their needs, as it will provide more choice and possibly result in reductions in costs of property. This could benefit those with protected characteristics who often do not have the purchasing power of others, but will more likely rely on other policies in the plan to ensure that targeted needs, such as affordable housing, mobility housing, specialist housing and family housing are provided. On the other hand, those with protected characteristics that make them economically disadvantaged may be more likely to be located in housing that is not close to public transport and amenities. Larger households might also be displaced through single family homes being redeveloped for additional smaller properties.

Alternative Policy: To only identify a housing figure to 2029

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	?	-	0	?	?	0	-	-	0	?	0	0	-	-	-	0	0	0	0	-	0	0	0	0

This policy approach will have negative impacts in relation to: health; accessibility; traffic; landscape and townscape; heritage; climate change mitigation; and regeneration. These impacts are associated with the reduced planning period which lessens the councils, and developer foresight. Over the long term this equates to a piecemeal approach with associated compounded impacts such as increased traffic and reduced understanding of infrastructural requirements. This will impact upon the realisation of long term plans such as the implementation of community combined heat and power systems, affecting climate change mitigation, and also the design and layout of the townscape. This approach may also impact upon developer interest, reducing their likelihood to invest in the borough due to a lack of a long term plan with which they can get on board with.

It is uncertain as to whether the policy approach will impact social inclusion, quality of surroundings, community safety, waste management, water quality and resources. The ability of the council to create a sense of place may be impaired due to the shorter time scale. This may also affect the general building design of the developments which are approved due to a decreased timescale to meet overall housing targets. Reducing the timescale for housing deployment may impact the ability of waste management efforts to foresee future trends and therefore may lack the necessary capacity come 2029 when policy changes.

The policy is seen to have a neutral impact upon housing, community identity, waste, environmental health, biodiversity, climate change mitigation and adaption, land and soil, open spaces, flood risk, employment, investment, education, and efficient infrastructure.

It is considered that this policy will have a neutral impact on people who have the following protected characteristics compared to the wider population: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation. At a general level the provision of additional homes is more likely to allow those with protected characteristics to better meet their needs, as it will provide more choice and possibly result in reductions in costs of property. This could benefit those with protected characteristics who often do not have the purchasing power of others, but will more likely rely on other policies in the plan to ensure that targeted needs, such as affordable housing, mobility housing, specialist housing and family housing are provided. After the period to 2029 however it will result in increased uncertainty if housing needs can be met as it often takes a long time for sites identified for housing to be delivered. It might also reduce the opportunity to plan on a larger scale which will in some cases reduce the economies of scale of a development, thus impacting on its ability to provide the necessary social infrastructure in a timely manner.

Conclusion: The proposed policy performs better across a wider range of indicators than the alternatives that are proposed, although the provision of housing undoubtedly has the potential for negative impacts around environmental matters, particularly use of resources, waste, etc. These matters can be reduced through other policies in the development plan, but ultimately cannot overcome what will be a use of finite resources.

Policy: BH2 PRIORITY AREAS FOR ADDITIONAL HOUSING PROVISION WITHIN BRENT

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	?	?	?	?	+	+	-	0	-	+	+	?	+	+	+	?	+	+	+	+	+	?

The policy will have positive impacts in relation to: addressing poverty; health and well-being; maintaining role and function of town centres; transport; bio-diversity, townscape, climate change, land and soil, flood risk, economic growth, employment and inward investment and education and skills. The concentration of development in areas with good accessibility to public transport and local shops and facilities will have a number of positive impacts for residents and those areas, such as making access to services easier for those who cannot afford to travel, reducing reliance on the car and its use, thus encouraging walking/ cycling, reducing the potential for negative impacts on climate change, with the increase in population helping to support greater use of shops and facilities in town centres. Ease of access to goods and services, including public transport links, is particularly important for those who are disabled, enabling them to more easily fulfil their requirements, helping to close the gap between their opportunities and those who do not share this characteristic. Focusing on existing developed areas will be beneficial for bio-diversity, land and soil, diverting development away from low intensity developed land/ green spaces. Investment in corridors/ under-used sites will improve townscape, these areas historically are outside the

floodplain, so new development will avoid areas of higher flood risk, whilst the regeneration of town centres and existing employment areas in particular aligned with policies to re-provide employment space will improve economic growth, employment space/ opportunities and thus encourage opportunities for inward investment and provide opportunities for people to have better access to training either in their area or by access to public transport to get to it.

The policy will have neutral impacts on water quality and noise and air pollution. Whilst such areas are likely to be away from water bodies and incorporate SUDs to reduce run-off, there may be a reliance on combined sewers, particularly in the south which could take up the capacity freed up through reduced run-off with sewage. The concentration of development in areas of high public transport will reduce vehicle use/ improve air quality compared to a more dispersed pattern, nevertheless concentration of homes in areas/ movement corridors potentially increases people's exposure prior to the movement towards low or no emissions vehicles to higher concentrations of poor air quality and also noise pollution associated with traffic and activity.

The policy will have negative impacts on waste and recycling. The intensification of development through its delivery in higher density schemes associated with these locations is likely to reduce household recycling amounts. Higher density dwellings, particularly flats with communal waste facilities have much lower rates of recycling than lower density homes where there is more space to separate items.

The policy will have uncertain impacts in relation to providing everyone with the opportunity to live in a home which meets their identified needs, enhancing community safety, community identity, historic assets, open space and reduce commuting. The locations generally are associated with higher density developments. Such areas generally produce lower proportions of larger family homes due to market and design matters, although increases in densities in all locations are leading to such pressures. Whilst higher density can be designed to reduce the potential for crime through provided for more overlooked places, areas with concentrated populations, or living in town centres will expose more people to the potential to witness crime/ perceive higher levels of crime, so whilst crime might be lower, perceptions might be that its higher. The placing of homes in areas of existing high character, e.g. town centres or creating new character, e.g. growth areas could assist in increasing community identity, higher densities however could reduce opportunities for neighbourly interactions, affecting cohesion. Whilst there will be protection and enhancement of designated heritage assets, there is the potential for existing character of areas to be changed significantly. In relation to open space, concentration of development will reduce pressure to develop on open spaces, nevertheless higher density development will limit potential for large spaces to be incorporated and might mean people have to travel longer distances to get to them. In relation to commuting and business infrastructure mixing uses has the potential to reduce commuting, but providing easy access to public transport also has the potential to increase it, whilst the same is true for business, opportunities for closer links could improve opportunities for business, but concentration means potential congestion which could impact on productivity.

It is considered that this policy will have positive effects on people who have the following protected characteristics compared to the wider population: age, gender reassignment, race and sex. Those at opposite ends of the age spectrum (young and old), women, those with a disability, pregnancy and maternity, gender reassignment, race are more like to have lower incomes than the general population and therefore have limited access to private vehicles and so will be more reliant on public transport and walking, which means facilities will need to be nearer. The prioritisation of homes in areas that have access to good public transport, facilities and social infrastructure will probably assist these groups. **It is considered that the policy could have a mixed impact on disability and pregnancy and maternity.** Concentration of homes in areas / movement corridors may potentially in the short to medium term increase people's exposure to higher concentrations of poor air quality, which may have a negative impact on pregnant women and disabled people. However, these particular protected characteristics are more likely to have lower incomes, and will therefore have limited access to private vehicles and be more reliant on public transport – as such, prioritisation of homes in these particular areas will assist these groups. Impacts are therefore mixed. For the other protected characteristics there are unlikely to be differential impacts compared to the general population. **The policy will have a neutral impact on marriage and civil partnership, religion and belief and sexual orientation.**

Alternative: No policy

I/A Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	-	?	?	?	-	-	+	0	-	?	?	?	-	-	?	-	-	-	-	-	-	-

Impacts are likely to be negative in relation to social indicators. Not being able to concentrate development in priority areas will mean that development will not be concentrated in areas with good accessibility to public transport and local shops and facilities.

Impacts are likely to be mixed in terms of environmental indicators. Not being able to concentrate development in areas of high public transport will mean that vehicle use will not be able to be reduced as much as if development were to be concentrated in specific areas. A lack of concentration of development may also have a negative impact in terms of pressure to develop on open spaces. However, impacts may be negative in terms of waste and recycling, as higher density dwellings have much lower rates of recycling than lower density homes where there is more space to separate items.

Impacts are likely to be negative in relation to economic indicators. Not being able to prioritise specific areas for additional housing provision within Brent is likely to result in difficulties in terms of promotion of regeneration, facilitating investment in the borough and facilitating sustainable, resilient economic growth.

The council wants to provide for and meet its housing delivery requirements, and as such identifying new sites where new homes are considered appropriate is necessary.

It is considered that this policy will have negative impacts on people who have the following protected characteristics compared to the wider population: age, disability, pregnancy and maternity, gender reassignment, race and sex. Those at opposite ends of the age spectrum (young and old), women, those with a disability, pregnancy and maternity, gender reassignment, race are more like to have lower incomes than the general population and therefore have limited access to private vehicles and so will be more reliant on public transport and walking, which means facilities will need to be nearer. The lack of a policy to prioritise homes in areas that have access to good public transport, facilities and social infrastructure is likely to negatively impact these groups. For the other protected characteristics there is unlikely to be differential impacts compared to the general population. **The policy will have a neutral impact on marriage and civil partnership, religion and belief and sexual orientation.**

Alternative Policy: To extend the scope of the policy so that it potentially captures more sites.

I/A Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	-	+	+	+	0	-	-	-	-	-	+	+	-	-	+	+	+	+	-	+	-	-	0

This policy approach will have a positive impact on: social inclusion; housing; quality of surroundings; community safety; biodiversity; landscape and townscape; climate change adaption; land and soil; open space; flood risk; and employment. Firstly, capturing more sites for housing development will generally ensure a greater level of delivery, increasing housing provision and affordability in the same stride. This will serve to disproportionately benefit those who have particular protected characteristics helping to increase equality, improving social inclusion and cohesion. This increase in development will bring with it greater receipts of CIL helping to improve the public domain and local infrastructure. Regeneration will also be of higher quality than existing infrastructure, especially in terms of climate change adaption with development design taking this into consideration to a much greater extent than older developments would have.

This policy approach will have negative impacts in relation to: health; traffic; waste management; water quality and resources; environmental health; heritage; accessibility; climate change mitigation; regeneration; investment; and education. These impacts are associated with an increase in development of lower PTAL areas, increasing car dependence, traffic congestion and associated reduction in air quality. Although this policy will likely lead to an increase in development, it will also cause a decrease in its density, reducing our ability to concentrate efforts in any given area, reducing development within town centres and its associated viability. This is

exacerbated by the likely development in lower PTAL areas, away from town centres, reducing residents' association with local centres and increasing their likelihood of traveling to more distant centres, reducing their sense of place, local town centre viability and investment in the process. With populations being spread more thinly, this will also have an impact upon social infrastructure provision, having to provide more infrastructure as opposed to creating a critical mass which serves the wider public. They also stem from the policies likely impact upon increased development which will increase pollution levels and the strain on associated infrastructure, such as sewer capacity and water provision. Also, town centres have generally evolved from historic sites and as such contain more heritage assets. Increasing the density of development within these areas therefore poses a potential risk to these assets.

The policy approach will have neutral impacts on community identity and efficient infrastructure.

The policy will have a neutral impact on age, disability, pregnancy and maternity, gender reassignment, marriage and civil partnership, race, religion and belief, sex and sexual orientation. The widening of the policy would potentially allow more people to access new homes which could possibly be delivered at a greater rate than compared to prioritisation of homes in smaller areas. The benefits of this could well however be off set against the potential for more difficulty to access good public transport, and local facilities and social.

Alternative Policy: To further reduce the scope of the policy by not requiring re-provision of non-residential floorspace in any circumstance

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	?	-	-	-	-	-	0	0	-	0	-	-	-	0	?	0	0	-	-	-	-	-

This policy approach will have negative impacts on: social inclusion; health; quality of surroundings; community safety; community identity; accessibility; traffic; environmental health; landscape and townscape; heritage; climate change mitigation; regeneration; employment; investment, education, infrastructure. Much of these negative impacts stem from the reduction in non-residential floorspace which serves to reduce local facilities and essential infrastructure, lowering levels of local jobs and accessibility to services. This in turn increases levels of transport in the effort to attain essential services and job employment opportunities which potentially increases car dependency and associated carbon emissions. This reduction in non-residential floorspace of all kinds will be of detriment to the local sense of place, reducing access to community facilities and directly impairing people's ability to partake in cultural practices. This will also cause the reduction in town centre viability, decreasing footfall within the area and with it the associated passive surveillance, leading to increasing levels of crime. These impacts are likely to disproportionately affect those from particular social sub-groups and those with protected characteristics, serving to increase inequalities within the borough.

The policy is seen to have a neutral impact on waste management, resources, climate change adaption, open spaces, and flood risk.

The policy is likely to have a combination of positive, neutral and negative impacts on age, disability, pregnancy and maternity, gender reassignment, marriage and civil partnership, race, religion and belief, sex and sexual orientation. The reduction of the need to re-provide non-residential would potentially allow more people to access new homes as the space reserved for other uses would become available for more residential development. The benefits of this could well however be off set against the potential for more difficulty to access the uses that would have been displaced particularly for those reliant on public transport, walking and cycling.

Conclusion The proposed policy performs better across a wider range of indicators than the alternatives that are proposed. The scope of the proposed policy strikes a balance between the positives of increased housing and the negatives of increased environmental pressure, and is in favour of sustainable development. By increasing the scope of the proposed policy further to capture more sites, the policy has the effect of increasing development within areas of low PTAL, increasing car dependence, whereas the proposed policy seeks to incur development within areas of high PTAL, negating this potential negative impact. To reduce the scope of the policy to not include the re-provision of non-residential floorspace would be of detriment to the local sense of place, negatively impacting a range of social criteria and reducing town centre viability and access to local jobs, and accessibility to services by those with limited mobility. Whilst non-provision might open up more opportunities for ground floor dwellings which become available to those with mobility issues, often this accommodation would be within busy streets at the pavement's edge and therefore might be compromised in terms of its amenity to provide a high quality residential environment.

Policy: BH3 BUILD TO RENT

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	+	0	0

The policy will have minor positive impacts in relation to social inclusion, homes to meet needs, business and inward investment. The incorporation of private rented will assist to some extent in addressing social inclusion by potentially providing a better market rented product compared to that offered by some small scale landlords, and in terms of meeting needs might better address those who are unable to buy properties but able to rent. This may also serve to increase the availability of specialty housing such as those designed for disabled residents, raising them up from potentially compromised living conditions and providing them with greater power of choice. Provision of additional rented properties will allow for a more flexible workforce able to move to work opportunities quicker/ easier and thus potentially increase inward investment by businesses.

The policy will have neutral impacts compared to the provision to housing for sale on health, high quality environment, community safety, diversity, accessibility, traffic, waste, water, environmental health, townscape, historic environment, climate change, soil, open space, flood risk, employment opportunities, education and skills and infrastructure. There is unlikely to be a significant differentiation between build to rent and owner-occupation led housing on these matters.

The policy is likely to have a mix of positive, neutral and negative impacts on age, disability, pregnancy and maternity, gender reassignment, marriage and civil partnership, race, religion and belief, sex and sexual orientation. The policy could have a positive impact on disabled groups by way of potentially raising them up from compromised living conditions by providing greater power of choice.

The provision of rental properties is part of a wider attempt to increase the overall volume of dwellings built. As such it might have a positive impact on some of those with protected characteristics who are currently unable to meet their housing needs in the open market, but who have the purchasing power to attain solutions if capacity was available. For those who are unable to afford market dwellings, some affordable housing will be provided with these dwellings, but the amount of affordable dwellings and discount on rents is in many cases likely to be lower than that delivered in association with conventional housing, meaning that benefits to those who might have less ability to have choices due to limited incomes (more likely to be the young/old, disabled, pregnant/ maternity, females, gender reassigned and race) is uncertain. Overall, it is likely to increase the amount of affordable homes delivered, however the rents on these properties are in the majority of cases likely to be higher than the affordable housing provided in conventional housing schemes.

Alternative Policy: No policy

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	0	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	0	0

Not having a policy regarding build to rent is likely to have a minor negative impact in terms of social indicators. The incorporation of private rented would assist to some extent in addressing social inclusion by potentially providing a better market rented product compared to that offered by some small scale landlords, and in terms of meeting needs might better address those who are unable to buy properties but able to rent. This could also serve to increase the availability of specialty housing such as those designed for disabled residents, raising them up from potentially compromised living conditions and providing them with greater power of choice. Not having a policy to encourage such provision may therefore have a detrimental impact in this regard.

Not having a policy will have a neutral impact in terms environmental indicators. There is unlikely to be a significant differentiation between build to rent and owner-occupation led housing on these matters.

Not having a policy will have a mainly neutral impact in terms of economic indicators. However, lack of provision of additional rented properties means that fewer opportunities may be provided allowing for a more flexible workforce, which could potentially increase inward investment by businesses.

Not having a policy regarding Build to Rent is not considered to be appropriate, as this would not be consistent with the desire of Government and the GLA to support the identification of additional sites to assist with the delivery of build-to-rent properties and increasing housing delivery overall.

The policy is likely to have a neutral impact on the protected characteristics of age, pregnancy and maternity, gender reassignment, marriage and civil partnership, race, religion and belief, sex and sexual orientation. The lack of a policy could have a negative impact on disabled groups by way of not making use of an opportunity to raise this group from compromised living conditions by providing greater power of choice. Assuming that the exclusion of a policy would reduce overall housing delivery, this could reduce the provision of dwellings/ affordable dwellings overall, having said that much of the affordable housing is unlikely to be affordable to those on the lowest incomes without housing benefit support.

Alternative Policy: To extend the scope of the policy so that it captures more sites, or a minimum amount of the development that should be Build to Rent

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	0	+	0	-	-	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+	+	0	+

This policy approach will have positive impacts on: social inclusion; housing; regeneration; employment; investment; and efficient infrastructure. Increased levels of rented accommodation, and their variety in type, which may increase market competition leading to a better, more affordable product for residents. By improving choice, affordability and availability, this policy will increase the life chances of those most economically disadvantaged within the borough, helping to reduce the inequalities suffered by those with specific protected characteristics, improving social relations overall. The provision of more rented accommodation will also serve to provide a more flexible work force which will encourage new start-ups and increase economic resilience. This flexibility in accommodation should help to reduce long/short term unemployment through increased power of choice. This should also serve to reduce the levels of commuting as people have more options in terms of location of accommodation and therefore can choose to live nearer to work.

This policy approach will have negative impacts on: community safety and community identity. For instance, by reducing the levels of home ownership on a site, this policy may inadvertently increase levels of crime. Also, increased levels of rent may reduce resident's average lengths of stay in any one place which has potential to reduce a person's sense of place and ability to develop long term local relationships and therefore their likelihood of attempting to interact with one another and therefore does not serve to help foster relationships between different social demographics.

The policy will have neutral impacts on well-being, quality of surroundings, accessibility, traffic, waste management, water, environmental health, townscape, historic environment, climate change, soil, open space, flood risk, and education.

The impacts on age, disability, pregnancy and maternity, gender reassignment, marriage and civil partnership, race, religion and belief, sex and sexual orientation are unclear. The provision of rental properties is part of a wider attempt to increase the overall volume of dwellings built. Build to rent operates a different funding model, meaning if part of a wider development it can also affect viability of development of market housing and associated affordable housing provided. This could impact of the delivery of these tenures meaning different impacts, either by for instance reducing the proportion of affordable housing or the tenure of the affordable housing. As such it might have a positive impact on some of those with protected characteristics who are currently unable to meet their housing needs in the open market, but who have the purchasing power to attain market rented solutions if capacity was available. For those who are unable to afford market dwellings, (more likely to be the young/old, disabled, pregnant/ maternity, females, gender reassigned and black and minority ethnic groups) it could well reduce the potential for their needs to be met through development.

Alternative Policy: To further reduce the scope of the policy

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	-	0	0	-	-	0	0	0	0	0	0	0	0	0	0	0	0	-	-	0	0	0

The policy is likely to negatively impact social inclusion, well-being, housing, community identity, accessibility, growth, and employment. This policy will reduce people's ability to find homes which meet their individual needs, decreasing their accessibility to key services and their ability to participate in society effectively, negatively affecting their employment opportunities. This will impact upon individual well-being and the likelihood that people from different backgrounds interact, reducing the sense of place and community, and the spread of culture and perspectives, particularly between those with protected characteristics and those without.

The policy will have neutral impacts upon quality of surroundings, crime, traffic, waste, water, environmental health, townscape, historic environment, climate change, soil, open space, flood risk, investment, education, and efficient infrastructure.

The impacts on age, disability, pregnancy and maternity, gender reassignment, marriage and civil partnership, race, religion and belief, sex and sexual orientation are unclear. The provision of rental properties is part of a wider attempt to increase the overall volume of dwellings built. Reducing its potential to be delivered is likely to adversely impact on those with protected characteristics who are currently unable to meet their housing needs in the open market, but who have the purchasing power to attain market rented solutions if capacity was available. For those who are unable to afford market dwellings, (more likely to be the young/old, disabled, pregnant/maternity, females, gender reassigned and black and minority ethnic groups) it could have mixed results, resulting in fewer affordable dwellings being built overall, but it could be that these dwellings are more affordable and therefore of better meet needs for the most vulnerable compared to more affordable dwellings which are less affordable to occupants, increasing the potential for debt and other associated issues.

Conclusion: The current proposed policy best reflects the boroughs needs, scoring positively on a number of criteria without incurring any measurable negative impacts. Increasing levels of rented accommodation is not seen to differentiate in its environmental impact with those built to own. Increasing rented accommodation to this extent will ensure a mixed tenure, increasing communications between people from different backgrounds and increasing the flexibility of workers through greater power of choice. Reducing the scope of the policy would serve to decrease competition within the rented sector, reducing living conditions for residents, negatively impacting a range of social and economic criteria.

Policy: BH4 SMALL SITES AND SMALL HOUSING DEVELOPMENTS IN BRENT

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	0	+	0	0	0	+	+	0	0	+	0	0	0	+	0	0	0	0	0	0	0	0	0

The policy will have minor positive impacts in relation to social inclusion, homes that meet needs, accessibility, traffic, air pollution, greenhouse gas emissions. Whilst the policy might marginally reduce the number of homes delivered compared to the London Plan policy which will impact on the ability of people to access homes that meet their needs, the emphasis on ensuring that the dwellings have good access to public transport will provide homes that better meet the needs of those with no private transport, those who may be unable to drive due to a disability, or who require access to facilities, such as those who are physically disabled, increasing their opportunities. This will produce benefits in terms of reducing reliance on the private car and therefore associated traffic generation, air pollution and greenhouse gases.

The policy will have neutral impacts on health, high quality environment, community safety, diversity, waste, water, townscape, historic environment, climate change, soil, open space, flood risk, employment opportunities, education and skills and infrastructure. Whilst areas that benefit from higher levels of public transport accessibility are more likely to have been developed more densely than lower suburban areas, they also are usually more historic in their character as they have been along main travel corridors. Increased development in these areas could potentially impact on character whilst giving greater likelihood of the character of lower PTAL areas remaining unchanged. In relation to impacts on other objectives there is unlikely to be significant differentiation between homes in PTAL 3-6 and PTAL 0-2 on these matters.

There will be a positive impact on the following groups: age, disability, pregnancy and maternity, sex, gender reassignment and race, as the young / old, disabled, pregnant and on maternity leave, female, gender reassigned and black and minority ethnic groups are more likely to be economically disadvantaged and therefore more reliant on having facilities close by, or having access to alternatives such as good public transport that provides the opportunity to greater access to facilities. **There will be a mixed / unclear impact on all other protected groups (religion and belief, sexual orientation and marriage and civil partnership).** This is because the policy could reduce the potential delivery of homes on small sites due to small sites being focused in locations with genuine reasonable public transport alternatives. This could be to the detriment of those in housing need.

Alternative Policy: No policy

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	0	-	0	0	0	0	-	0	0	-	0	0	0	-	0	0	0	0	0	0	0	0	0

Not having a policy will have mainly neutral impacts, but some negative impacts in terms of social indicators. Not having a policy to ensure that proposals to increase density of existing residential homes within only PTAL 3-6 locations may result in development being encouraged in areas of high car dependency, which could result in a reduced quality of life for existing residents. Not having such a policy will mean that it cannot be ensured that dwellings have good access to public transport to provide homes that meet the needs of those who require access to facilities.

Not having a policy will have mainly neutral impacts, but some negative impacts in terms of environmental indicators. As noted above, not restricting residential extensions (in terms of small sites and small housing developments in Brent) to homes within a PTAL of 3-6 may result in increased development within areas of high car dependency (such as sites within an 800m buffer of a town centre, but with poor physical links to that centre). This could have a negative impact on air quality and traffic generation.

Not having a policy will have a neutral impact in terms of economic indicators.

Not having a policy is not considered to be appropriate. Brent does not consider that the generic approach identified in the London Plan would deliver the number of dwellings that the London Plan identifies.

Not having a policy would have a negative impact on the following groups: age, disability, **pregnancy and maternity, sex, gender reassignment and race**, as the young / old, disabled, pregnant and on maternity leave, female, gender reassigned and black and minority ethnic groups are more likely to be economically disadvantaged and therefore more reliant on having facilities close by, or having access to alternatives such as good public transport that provides the opportunity to greater access to facilities. **There will be a mixed / unclear impact on religion and belief, sexual orientation and marriage and civil partnership.**

Alternative Policy: To extend the scope of the small sites policy so that it potentially captures more sites

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	0	-	-	0	0	0	-	-	0	0	-	-	0	0	-	0	-	0	-	0	0	0	0	0

This policy approach will have negative impacts on: health; housing; accessibility; traffic; environmental health; biodiversity; climate change mitigation; land and soil; and flood risk. Increased scope of the policy may include increased developments within lower PTAL areas which would mean a greater dependence on private vehicles which could in turn lead to reduced levels of activity and increased air pollution, reducing health generally. Developments outside of the proposed priority locations are not fit for the habitation of those who are physically disabled as they require close proximity to goods and services in order to meet their requirements without difficulty. There is also concern of how the policy may push developments into areas which currently meet specific needs, such as housing for larger families. This could lead to reduction in such housing and its replacement with less required types. The expansion, or lack of a requirement for the Urban Greening Factor to be applied, may also leave areas currently not considered vulnerable to development which could lead to a reduction in biodiversity, soil quality and permeability for flood mitigation.

The policy will have neutral impacts on social inclusion, quality of surroundings, crime, community identity, waste, resources, landscape, heritage, climate change adaption, open space, regeneration, employment, investment, education, and efficient infrastructure.

The impacts on age, disability, pregnancy and maternity, gender reassignment, marriage and civil partnership, race, religion and belief, sex and sexual orientation are mixed/ unclear. The policy is likely to increase the potential capacity of homes delivered on these

sites. This could be to the benefit of some of those with protected characteristics in terms of meeting their housing needs. On the other hand, the homes that will be provided will also be in locations that overall will have much more limited access to public transport or services as they would be in more remote locations. This will result in a negative impact for the young/old, disabled, pregnant/ maternity, females, gender reassigned and black and minority ethnic groups who are more likely to be economically disadvantaged and therefore more reliant on having facilities close by, or having access to alternatives such as good public transport that provides the opportunity for greater access to facilities.

Alternative Policy: To further reduce the scope of the small sites policy

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	0	-	0	0	0	-	-	0	0	0	0	0	0	0	0	0	0	0	-	-	-	0	-

This policy approach will have negative impacts on: social inclusion; housing; accessibility; traffic; regeneration; employment; investment; and efficient infrastructure. This policy approach will decrease site provision, therefore reducing the provision of housing, its general affordability and the likelihood of housing meeting the individual needs of residents leading to lower levels of social inclusion, disproportionately impacting those with protected characteristics. The reduced scope of this policy is likely to mean a lower level of development in town centre areas, increasing development in areas outside town centres, including areas of lower PTAL which will reduce resident's accessibility to key services, in the process increasing their dependence on personal vehicles. The reduced development in town centre areas will have negative economic consequences, resulting in lower levels of growth and investment in these areas and as a result fewer job prospects and increased commuting.

This policy will have neutral impacts on well-being, quality of surroundings, crime, community identity, waste, resources, environmental health, biodiversity, landscape and townscape, heritage, climate change mitigation and adaption, land and soil, open spaces, flood risk, and education.

The impacts on age, disability, pregnancy and maternity, gender reassignment, marriage and civil partnership, race, religion and belief, sex and sexual orientation are mixed/ unclear. The policy is likely to reduce the potential capacity of homes delivered on these sites. This could be to the detriment of some of those with protected characteristics in terms of meeting their housing needs. On the other hand, for instance if a higher PTAL level (4 or above was required) the homes that will be provided will be in locations that overall will have much better access to public transport. This will be better for the young/old, disabled, pregnant/ maternity, females, gender reassigned and black and minority ethnic groups who are more likely to be economically disadvantaged and therefore more reliant on having facilities close by, or having access to alternatives such as good public transport that provides the opportunity for greater access to facilities.

Conclusion: The proposed policy is seen as appropriate for Brent, considering its current transport infrastructure and its location. This policy supports small site development which should help the council meet its housing requirements. As with other policies, this policy helps balance out the pros and cons of additional development, whereby capturing more sites would be of environmental detriment, and reduced scope would decrease housing provision, negatively impacting the provision of affordable housing also.

Policy: BH5 AFFORDABLE HOUSING

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	++	+	++	+	0	+	+	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	0	0

The policy approach will have positive impacts in relation to social inclusion, health, homes that meet needs, high quality environment, diversity, accessibility, and employment opportunities. The policy will seek to maximise the amount of affordable housing provided, thus giving greater opportunity for those with limited resources to better meet their housing needs, rather than living in for example more expensive, overcrowded, poor quality or temporary accommodation. The policy sets a target of 50% of new homes within the plan period being affordable housing. Of this 50%, non-Build-to Rent developments of 10 dwellings or more are expected to provide at least 70% social rent / London affordable rent and 30% intermediate products. For Build to Rent developments, a minimum of 100% at London Living Rent is expected. This will improve a number of associated objectives that relate to quality of life and life chances which impact on issues such as health, accessibility to services, educational outcomes and improved employment opportunities. Any deviation from the affordable tenure mix and other policy requirements consistent with the fast track approach will require justification through a policy complaint viability assessment. This will ensure that the target will not result in reduced provision of affordable housing due to viability reasons.

The policy will have neutral impacts on community safety, traffic, waste, water, air pollution, bio-diversity, townscape, historic environment, climate change, soil, greenhouse gas emissions, open space, flood risk, education and skills and infrastructure. There is unlikely to be any significant variation between the provision of market and affordable homes on outcomes in relation to these particular objectives.

In relation to marriage and civil partnership, religion and belief and sexual orientation the policy is likely to have a neutral impact on those with a protected characteristic. The impacts on age, disability, race, pregnancy and maternity, gender, gender reassignment are likely to be positive.

The policy seeks to maximise truly affordable dwellings within the borough, balancing up identified priority needs with the potential capacity/ viability of homes delivered on sites. In relation to the groups that the policy is identified as having a positive impact on, this is because these protected characteristics contain sub-groups which are on the whole likely to have a higher representation in affordable housing needs than the general population due to their economic circumstances being poorer.

Alternative Policy: No policy

I/A Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	-	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	0	0	0	0

Not having a policy regarding affordable housing is likely to have a negative impact in terms of social indicators. The lack of provision of affordable housing would result in more expensive homes, overcrowding, poor quality accommodation and temporary accommodation. This will result in a reduced quality of life and life chances, which impact on issues such as health, accessibility of services, educational outcomes and improved employment opportunities.

Not having a policy regarding affordable housing is likely to have a neutral impact in terms of environmental indicators. There is unlikely to be any significant variation between the provision of market and affordable homes on outcomes in relation to these particular objectives.

Not having a policy regarding affordable housing is likely to have a mainly neutral but slightly negative impact in terms of the economy. There is unlikely to be any significant variation between the provision of market and affordable homes on outcomes in relation to these particular objectives, however, a mix of tenures within communities and in particular sufficient affordable homes to assist provide living accommodation for those on lower incomes who occupy jobs which are nevertheless necessary to support the functioning of society is likely to help promote sustainable, resilient and inclusive economic growth with tangibly benefits Brent residents and the environment.

Not having a policy is not considered to be appropriate, as it would not be regarded as being in general conformity with the London Plan.

Not having a policy regarding affordable housing is likely to have a negative impact on the protected characteristics of age, disability, race, pregnancy and maternity, sex, gender reassignment. This is because these sub-groups are on the whole likely to have a higher representation in affordable housing needs than the general population. **On the other protected characteristics (marriage and civil partnership, religion and belief and sexual orientation) this approach is likely to have a neutral impact.**

Alternative Policy: To provide more emphasis on providing intermediate products																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	-	-	-	-	-	0	0	0	0	0	0	0	0	0	0	0	0	-	-	0	0	0
This policy approach will have negative impacts on: social inclusion; health; housing; quality of surrounding; community safety; community identity; accessibility; regeneration; and employment. This policy has a potentially large negative socio-economic impact with primary concern residing over the policies misalignment with borough need of social housing and affordable rent. This policy may therefore serve to increase inequality by exiling the borough’s most economically disadvantaged, disproportionately occupied by those with certain protected characteristics, reducing their social integration, living conditions and prospects generally, and increasing levels of crime and resentment between demographics. Also, those most economically vulnerable often fill essential service roles within the economy which are often low paid. The emphasis on intermediate products and not social housing will mean there is a smaller amount of dwellings which can feasibly be occupied by these individuals. This will have a direct impact on the viability of local businesses which require local people to employ in these key service roles.																								
This policy will have neutral impacts on traffic, waste, resources, environmental health, biodiversity, landscape and townscape, heritage, climate change mitigation and adaption, land and soil, open spaces, flood risk, investment, education, and efficient infrastructure.																								
The impacts on age, disability, race, pregnancy and maternity, sex and gender reassignment are likely to be negative when compared against the preferred policy. In relation to marriage and civil partnership, religion and belief and sexual orientation the policy is likely to have a neutral impact on those with a protected characteristic. The policy seeks to maximise more intermediate affordable dwellings within the borough. This essentially moves away from priority housing needs for those less likely to be able to address their needs in the market. In relation to the groups that the policy is identified as having a negative impact on, this is because sub-groups of these protected characteristics are on the whole likely to have a higher representation in affordable housing needs than the general population due to their economic circumstances being poorer. Whilst an increase in intermediate tenures will be positive for some of the population, allowing them to potentially own their own home eventually, these people are generally are likely to be better off and able to afford solutions in the market, such as renting.																								
Alternative Policy: To seek a higher proportion of affordable housing than the London Plan fast track thresholds																								

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	-	-	-	-	-	0	0	0	0	0	0	0	0	0	0	0	0	-	-	0	0	0

There are no anticipated positive impacts of adopting this policy over the current proposed policy.

The predicted negative impacts of this policy are: social inclusion, health, housing, quality of surroundings, community safety, community identity, accessibility, regeneration, employment. These impacts are a result of the policy's potential due to viability to lead to a move away from the current preferred mix which is viable at the threshold levels identified. A higher target will reduce the provision of affordable housing types for which there is an identified need within the borough, including socially rented and London Affordable Rent options. This will negatively impact upon the living standards of those most economically disadvantaged by reducing their capacity to acquire appropriate housing, increasing their reliance upon privately rented accommodation, reducing their levels of disposable income which in turn reduces their real capacity to access local services. This will also serve to obstruct communication between different communities and cultures and those with protected characteristics, increasing feelings of social segregation, decreasing their sense of community and increasing crime rates within the area. Those most economically vulnerable often fill essential service roles within the economy which are often low paid. The reduced provision of affordable housing which meets an identified need within the borough will mean there is a smaller amount of dwellings which can feasibly be occupied by these individuals. This will have a direct impact on the viability of local businesses which require local people to employ in key service roles, reducing local employment overall.

This policy is predicated to have neutral impacts on traffic, waste, resources, environmental health, biodiversity, landscape and townscape, heritage, climate change mitigation and adaption, land and soil, open spaces, flood risk, investment, education, and efficient infrastructure.

The impacts on age, disability, race, pregnancy and maternity, gender, gender reassigned and race are likely to be negative when compared against the preferred policy. In relation to marriage and civil partnership, religion and belief and sexual orientation the policy is unlikely to have a difference on those with a protected characteristic. The policy would result in greater affordable homes delivered, but more intermediate affordable dwellings within the borough at the expense of rented. This essentially moves away from priority housing needs for those less likely to be able to address their needs in the market. In relation to the groups that the policy is identified as having a negative impact on, this is because these groups are on the whole likely to have a higher representation in affordable housing needs than the general population due to their economic circumstances being poorer. Whilst an increase in intermediate tenures will be positive for some of the population, allowing them to potentially own their own home eventually, these people are generally are likely to be better off and able to afford solutions in the market, such as renting.

Conclusion: The proposed policy is seen to have the greatest propensity for positive change within the borough. The borough has a specific need for both socially rented and London Affordable Rent dwellings for which this policy should help to increase by emphasising their provision. These types of housing require greater levels of developer subsidy, directly impacting site viability. Therefore, with the implementation of greater levels of affordable housing, comes a restriction upon the proportion of the units which can feasibly be under this tenure, resulting in lower levels of socially rented accommodation and greater levels of intermediate rental units.

Policy: BH6 HOUSING SIZE MIX

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	+	+	0	+	+	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	0	0

The policy will have positive impacts in relation to social inclusion, health, homes that meet needs, high quality environment, diversity, accessibility and employment opportunities. The policy will seek to increase the amount of larger family housing provided compared to market delivery rates that would otherwise prevail. This will potentially give greater opportunity for larger families to better meet their housing needs, rather than living in for example more cramped conditions, or for example multi-generational households being split. This will improve a number of associated objectives that relate to quality of life and life chances which impact on issues such as health, accessibility to services, educational outcomes and improved employment opportunities.

The policy will have neutral impacts on community safety, traffic, waste, water, air pollution, bio-diversity, townscape, historic environment, climate change, soil, greenhouse gas emissions, open space, flood risk, education and skills and infrastructure. There is unlikely to be any significant variation between the provision of smaller and larger homes on outcomes in relation to these particular objectives.

The impacts on race, disability, religion and belief, pregnancy and maternity are likely to be positive. In relation to marriage and civil partnership, age, sex, gender reassignment and sexual orientation the policy is likely to have a neutral impact on those with a protected characteristic. The policy seeks to provide a minimum number of larger family dwellings. This is somewhat off the need identified but is also influenced by impact on viability and ensuring mixed communities on new developments. In relation to the groups that the policy is identified as having a positive impact on, this is because these groups are more likely to require larger family dwellings, either to accommodate extended or more immediate family members, to accommodate potential live in professional carers or to accommodate division of space between males and females related to religion. To purely rely on the market is likely to result in nearly all dwellings being 1 or 2 bed, which will not meet Brent's priority needs which are for 3 bed or larger properties.

Alternative Policy: To provide an overview of accommodation needs, but no minimum target																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	-	0	-	-	-	-	0	0	0	0	0	0	0	0	0	0	0	-	0	0	0	0
This policy will negatively impact social inclusion, well-being, housing, crime, community identity, accessibility, and regeneration. This policy would lack guidance for developers, resulting in the likely decrease in provision of 3 bed family units, reducing their social inclusion and increasing their chances of having compromised living conditions, reducing their overall health and well-being. The reduced integration of families will lead to their diminished influence in a neighbourhood, resulting in the likely increase in levels of crime. New developments are focused around high PTAL areas in close proximity to town centres, reducing provision of family units will decrease their levels of access to essential infrastructure such as schools and healthcare. This will also lead to their increased dependence on personal vehicles for transporting children to and from school, increasing traffic and decreasing their activity levels and potential future participation in physical activity. This policy is predicated to have neutral impacts on quality of surroundings, waste, resources, environmental health, biodiversity, landscape and townscape, heritage, climate change mitigation and adaption, land and soil, open spaces, flood risk, employment, investment, education, and efficient infrastructure. The impacts on race, disability, pregnancy and maternity, religion and belief are likely to be negative. In relation to marriage and civil partnership, age, sex, gender reassignment and sexual orientation the policy is likely to have a neutral impact on those with a protected characteristic. The policy would unlikely lead to greater implementation of family housing than if the policy did not exist. As such those requiring larger family homes due to extended family or more immediate family requirements, to accommodate potential live in professional carers or to accommodate division of space between males and females related to religion are likely to not have their needs met.																								
Alternative Policy: No policy																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	-	0	-	-	-	-	0	0	0	0	0	0	0	0	0	0	0	-	0	0	0	0
Not having a policy would likely negatively impact social inclusion, well-being, housing, crime, community identity, accessibility, and regeneration. Not having a policy would lack guidance for developers, resulting in the likely decrease in provision of 3																								

bed family units, reducing their social inclusion and increasing their chances of having compromised living conditions, reducing their overall health and well-being. The reduced integration of families will lead to their diminished influence in a neighbourhood, resulting in the likely increase in levels of crime. New developments are focused around high PTAL areas in close proximity to town centres, reducing provision of family units will decrease their levels of access to essential infrastructure such as schools and healthcare. This will also lead to their increased dependence on personal vehicles for transporting children to and from school, increasing traffic and decreasing their activity levels and potential future participation in physical activity.

This approach is predicated to have neutral impacts on quality of surroundings, waste, resources, environmental health, biodiversity, landscape and townscape, heritage, climate change mitigation and adaption, land and soil, open spaces, flood risk, employment, investment, education, and efficient infrastructure.

Not having a policy is not considered to be appropriate, as it would likely result in significantly fewer new family sized homes being built, thus meaning greater overcrowding and also out migration of the existing population in order to meet their housing needs.

The impacts on race, disability, pregnancy and maternity, religion and belief are likely to be negative. In relation to marriage and civil partnership, age, sex, gender reassignment and sexual orientation the policy is likely to have a neutral impact those with a protected characteristic. Not having a policy would likely lead to less family housing being constructed than if such a policy did exist. As such those requiring larger family homes due to extended family or more immediate family requirements, to accommodate potential live in professional carers or to accommodate division of space between males and females related to religion are likely to not have their needs met.

Alternative Policy: To provide a higher target

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	-	0	0	0	-	0	0	0	0	0	0	0	0	0	0	0	0	0	-	0	0	0

This policy will negatively impact social inclusion, well-being, housing, accessibility, and employment. Although there is an identified need within the borough for family dwellings, its over provision will significantly impact on development viability and lead to the reduction in output of other units which have an identified need. This will impact negatively on social inclusion and access to housing

which is suited to the needs of smaller households, reducing their overall well-being and ability to participate effectively in society, reducing their long-term employment opportunities.

This policy is predicated to have neutral impacts on quality of surroundings, crime, community identity, traffic, waste, resources, environmental health, biodiversity, landscape and townscape, heritage, climate change mitigation and adaption, land and soil, open spaces, flood risk, regeneration, investment, education, and efficient infrastructure.

The impacts on race, disability, pregnancy and maternity are likely to be positive. In relation to marriage and civil partnership, age, religion and belief, sex, gender reassignment and sexual orientation the policy is like to have a neutral impact. The policy would provide a minimum number of larger family dwellings more aligned to needs. This policy allows those requiring larger family homes due to extended family or more immediate family requirements, to accommodate potential live in professional carers or to accommodate division of space between males and females related to religion to more likely have their needs met. However, additional provision will affect values which will impact on other outputs such as affordable housing and total dwelling numbers.

Conclusion: The proposed policy is seen to generate the greatest amount of positive impacts. This is achieved through a balanced approach whereby the policy provides sufficient guidance for developers on how to meet this borough need without compromising their ability to meet the needs of other specific housing requirements. This will lead to greater living conditions for larger families, achieving wider social benefits through the mixed type of accommodation provided on a specific site.

Policy: BH7 ACCOMMODATION WITH SHARED FACILITIES OR ADDITIONAL SUPPORT

I/A Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	++	++	+	+	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	0	0

The policy will have positive impacts in relation to social inclusion, health, homes that meet needs, high quality environment, community safety, diversity, accessibility, and employment opportunities. The policy will seek to support an increase in shared accommodation and accommodation with additional support and protect existing accommodation where it is required to meet needs. It seeks to ensure that such accommodation is located close to facilities and good public transport. It also seeks to maintain the quality of life of adjacent occupiers. The policy will allow a variety of sectors of the community to better meet their housing needs such as the aged and those with disabilities. This will improve a number of associated objectives that relate to quality of life and life chances which impact on issues such as health, accessibility to services, educational outcomes, and improved employment opportunities.

The policy will have neutral impacts on, traffic, waste, water, air pollution, bio-diversity, townscape, historic environment, climate change, soil, greenhouse gas emissions, open space, flood risk, education and skills and infrastructure. There is unlikely to be any significant variation between the provision of shared accommodation and standard homes on outcomes in relation to these particular objectives.

The impacts on age, disability, religion and belief, and sex are likely to be positive. In relation to race, marriage and civil partnership, pregnancy and maternity, gender reassignment and sexual orientation the policy is likely to have a neutral impact on those with a protected characteristic. The policy allows for the specific needs of some protected characteristics groups to be met through communal living. In relation to age this will be beneficial for the young (students, those who are on benefits with age restrictions on types of accommodation they can access, or those with supported housing needs), the old (nursing homes), disabled could benefit through supported schemes and women for example through shelters protecting them from domestic abuse, or accommodation providing relief from caring for a family member which they are more likely to do.

Alternative Policy: No policy

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	-	-	-	-	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Not having a policy is likely to have a negative impact in terms of social indicators. The lack of a policy to manage such accommodation may lead to an over-concentration of accommodation in one place, which may lead to the social exclusion of those who do not fit into that category, leaving them to feel ill at ease. This may also cause the surrounding infrastructure to change in accordance with the specific needs of the new majority, leading to a reduction in diversity of services and further excluding the minority social groups by reducing their accessibility to required goods and services. The group in question may be of a particularly transient nature, reducing the sense of place further, and also the likelihood of ownership which could act to increase crime rates within the area. These groups of people would be more homogenous in their origin and social status, leading to a reduction in the sharing of values and perceptions through proximity. Additionally, the lack of a policy could lead to an under-provision of certain types of accommodation which meet specific borough needs such as those which require assisted living. This will disproportionately lead to the detriment of certain social groups who require accommodation in central areas, close to facilities and public transport. By reducing this required provision, this policy will lead to the social isolation of certain groups of residents and the associated reduction in overall well-being which comes with this.

Not having a policy is likely to have a neutral impact in terms of economic and environmental indicators.

Not having a policy is not considered to be appropriate, as without it, accommodation may be placed in inappropriate locations and potentially have an adverse impact on neighbourhoods through over-concentration of shared accommodation.

The impacts on age, disability, religion and belief and sex are likely to be negative. In relation to race, marriage and civil partnership, pregnancy and maternity, gender reassignment, and sexual orientation the policy is likely to have a neutral impact. This approach would reduce the opportunity for the specific needs of some protected characteristics groups to be met through communal living that could otherwise be met through the preferred policy. In relation to age, this will be detrimental for the young (students, those who are on benefits with age restrictions on types of accommodation they can access, or those with supported housing needs), the old (nursing homes), disabled could benefit through supported schemes and women for example through shelters protecting them from domestic abuse, or accommodation providing relief from caring for a family member which they are more likely to do.

Alternative Policy: To not include criteria that seek to stop an over-concentration of accommodation in a place

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	-	-	-	-	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

The policy will have negative impacts on social inclusion, health and well-being, housing, quality of surroundings, crime, community identity, and accessibility. These impacts are all social and are associated with the likely over representation of certain social groups which may occur with the implementation of this policy amendment. Without specifications of accommodation concentrations, over representation of certain groups may lead to the social exclusion of those whom do not fit into that category, leaving them to feel ill at ease. This may also cause the surrounding infrastructure to change in accordance with the specific needs of the new majority, leading to a reduction in diversity of services and further excluding the minority social groups by reducing their accessibility to required goods and services. The group in question may be of a particularly transient nature, reducing the sense of place further, and also the likelihood of ownership which could act to increase crime rates within the area. These groups of people would be more homogenous in their origin and social status, leading to a reduction in the sharing of values and perceptions through proximity.

This policy will have neutral impacts on traffic, waste, resources, environmental health, biodiversity, landscape and townscape, heritage, climate change mitigation and adaption, land and soil, open spaces, flood risk, regeneration, employment, investment, education, and efficient infrastructure.

The impacts on age, disability, religion and belief, and sex are likely to be more positive as there is potential for perhaps greater amounts of communal accommodation to be provided. In relation to race, marriage and civil partnership, pregnancy and

maternity, gender reassignment and sexual orientation the policy is likely to have a neutral impact on those with a protected characteristic. The policy allows for more of the specific needs of some protected characteristics groups to be met through communal living. In relation to age this will be beneficial for the young (students, those who are on benefits with age restrictions on types of accommodation they can access, or those with supported housing needs), the old (nursing homes), disabled could benefit through supported schemes and women for example through shelters protecting them from domestic abuse, or accommodation providing relief from caring for a family member which they are more likely to do.

Alternative Policy: To not require consideration of other potential non-self-contained accommodation for which there is a need when an existing use is no longer required on site.

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	-	-	0	0	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

The policy will have negative impacts on social inclusion, well-being, housing, quality of surroundings, and accessibility. The negative impacts outlined here are primarily associated with the reduction of accommodation types which meet specific borough needs such as those which require assisted living. This will disproportionately lead to the detriment of certain social groups whom require accommodation in central areas, close to facilities and public transport. By reducing this required provision, this policy will lead to the social isolation of certain groups of residents and the associated reduction in overall well-being which comes with this.

This policy will have neutral impacts on crime, community identity, traffic, waste, resources, environmental health, biodiversity, landscape and townscape, heritage, climate change mitigation and adaption, land and soil, open spaces, flood risk, regeneration, employment, investment, education, and efficient infrastructure.

The impacts on age, disability, religion and belief and sex are likely to be negative. In relation to race, marriage and civil partnership, pregnancy and maternity, gender reassignment, and sexual orientation the policy is likely to have a neutral impact on those with a protected characteristic. The policy would reduce the opportunity for the specific needs of some protected characteristics groups to be met through communal living that could otherwise be met through the preferred policy. In relation to age this will be detrimental for the young (students, those who are on benefits with age restrictions on types of accommodation they can access, or those with supported housing needs), the old (nursing homes), disabled could benefit through supported schemes and women for example through shelters protecting them from domestic abuse, or accommodation providing relief from caring for a family member which they are more likely to do.

Conclusion: The proposed policy is seen to be most beneficial to Brent, providing significant positive impacts. This is due to the policies broad considerations of the needs of those who require shared facilities/assisted living and the impacts that their presence may have on the local community. The policy identifies the potential problems which may be caused by the over representation of any social groups in an area, and the acknowledgement that borough needs are dynamic and that developments may be utilised for a variety of purposes. The Public Sector Equality Duty also requires the fostering of good relations between groups with a protected characteristic, and those without. As such the policy, by way of identifying potential problems associated with over-representation of any social groups, supports the fostering of good relations amongst all social groups.

Policy: BH8 SPECIALIST OLDER PERSONS HOUSING

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	++	+	++	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

The policy will have positive impacts in relation to social inclusion, health, homes that meet needs, high quality environment, community safety, diversity and accessibility. The policy will seek to support an increase in the provision of specialist homes for older people to better meet needs. Whilst the market might seek to respond to needs, evidence to date indicates that the response has been limited. A proactive approach by the Council to encourage provision on sites is likely to better meet needs than would otherwise be the case. This will improve a number of associated objectives that relate to quality of life for older people which impact on issues such as social exclusion, health and accessibility to services.

The policy will have neutral impacts on, traffic, waste, water, air pollution, bio-diversity, townscape, historic environment, climate change, soil, greenhouse gas emissions, open space, flood risk, education, employment opportunities and skills and infrastructure. There is unlikely to be any significant variation between the provision of older person's housing and standard homes on outcomes in relation to these particular objectives.

The impacts on age and disability are likely to be more positive as there is potential for perhaps greater amounts of communal accommodation to be provided. In relation to race, sex, marriage and civil partnership, pregnancy and maternity, gender reassignment, religion and belief and sexual orientation the policy is like to have a neutral impact on those with a protected characteristic. The policy allows for more of the specific needs of some protected characteristics (notably age) groups to be met through communal living. In relation to age this will be beneficial for older people and disabled (wardens/ extra care/ nursing homes).

Alternative Policy: No policy																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	-	-	-	-	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Impacts are likely to be negative in terms of social indicators. Not having a policy would likely lead to a reduced number of sites coming forward for older people’s housing development due to the increased demands reducing development profitability and viability to purchase sites. It will also reduce the opportunities for older people to move out of accommodation they are under-occupying, which is likely to be larger homes that could be occupied by families for which there is a need within the borough. Impacts are likely to be neutral in terms of economic and environmental indicators. This approach is not considered to be appropriate, as it provides no certainty that at least some of the specialist older people’s target will be achieved. The impacts on age and disability are likely to be negative, as there is a risk of an insufficient amount of communal accommodation being provided in the plan period. In relation to race, sex, marriage and civil partnership, pregnancy and maternity, gender reassignment, religion and belief and sexual orientation the policy is like to have a neutral impact on those with a protected characteristic.																								
Alternative Policy: To require higher or lower provision from sites in Growth Areas																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	-	-	-	-	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
There are no anticipated Positive impacts of adopting this policy over the current proposed policy. The negative impacts associated with this policy are in relation to social inclusion, health, homes that meet needs, high quality environment, community safety, diversity, and accessibility. The current provision represents 10% of the growth area development capacity to 2041 and is seen as an appropriate target. Amendments to this target would likely result in the over development of specialist sites and the under development of dwellings which meet other needs within the borough, or vice versa. Focusing too heavily on one need will therefore be to the detriment of other needs, reducing equality overall.																								

This policy will have neutral impacts on traffic, waste, resources, environmental health, biodiversity, landscape and townscape, heritage, climate change mitigation and adaption, land and soil, open spaces, flood risk, regeneration, employment, investment, education, and efficient infrastructure.

The impacts on age and disability are likely to vary. Providing less specialist older people's housing will result in negative impacts on the population as a whole as needs are less likely to be met, whilst providing more than the preferred policy is likely to result in more positive impacts in relation to age and disability. In relation to race, sex, marriage and civil partnership, pregnancy and maternity, gender reassignment, religion and belief and sexual orientation the policy is likely to have a neutral impact on those with a protected characteristic. The policy allows for either more or less of the specific needs of some protected characteristics groups to be met through communal living. In relation to age this will be beneficial for older people and disabled (wardens/ extra care/ nursing homes) where more is provided, but less beneficial where less accommodation is provided. Providing more is likely to impact on the provision of other affordable needs as it will be argued that such provision impacts on development viability, this could have consequential adverse impacts on some groups with protected characteristics that are more likely to be reliant on mainstream affordable housing than the general population.

Alternative Policy: To identify a smaller threshold than 500 dwellings or set a target for these sites

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	-	-	-	-	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

The negative impacts associated with this policy are in relation to social inclusion, health, homes that meet needs, high quality environment, community safety, diversity, and accessibility. This policy amendment would likely lead to a reduction in sites coming forward for development due to increased demands reducing development profitability and viability. This would lead to a potential reduction of housing provision and also provision of sites for specialist housing needs, such as those for older people, resulting in the inverse intention of the proposed policy. The growth areas have been chosen due to their high levels of service accessibility and are therefore appropriate for the development of older persons housing, however, developments outside of these areas are likely to have lower levels of accessibility to facilities and lower PTALs which would not suit housing requirements for this demographic. Therefore, it is seen as appropriate that 500 units would be sufficient to help uplift an area outside of a growth area, providing potential for additional infrastructure should needs not be met already within an area.

This policy will have neutral impacts on traffic, waste, resources, environmental health, biodiversity, landscape and townscape, heritage, climate change mitigation and adaption, land and soil, open spaces, flood risk, regeneration, employment, investment, education, and efficient infrastructure.

The impacts on age and disability are likely to vary. To identify a smaller site threshold and setting a target could result in providing more specialist older people's housing, which could in turn result in more positive impacts in relation to age and disability. In relation to race, sex, marriage and civil partnership, pregnancy and maternity, gender reassignment, religion and belief and sexual orientation the policy is likely to have a neutral impact those with a protected characteristic. The policy allows for either more or less of the specific needs of some protected characteristics groups to be met through communal living. In relation to age this will be beneficial for older people and disabled (wardens/ extra care/ nursing homes) where more is provided. However, providing more specialist older persons housing is likely to impact on the provision of other affordable needs, and on smaller sites could also affect delivery timing of market dwellings as it could be argued that such provision impacts on development viability. This could have consequential adverse impacts on some groups with protected characteristics that are more likely to be reliant on mainstream affordable housing than the general population.

Conclusion: The proposed policy has the greatest potential to enable positive change within the borough. The proposed policy provides a realistic expectation on delivery of specialist homes whilst not undermining the requirements of other social groups and policies. This figure, combined with other requirements, still allows developers sufficient flexibility in order to remain viable, encouraging them to continue to deliver housing within the borough.

Policy: BH9: GYPSY AND TRAVELLER ACCOMMODATION

I/A Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	++	+	++	+	+	0	0	0	0	0	0	0	0	0	0	+	0	0	0	0	+	0

The policy will have positive impacts in relation to social inclusion, health, homes that meet needs, high quality environment, community safety, diversity, accessibility, open spaces and education. The policy will seek to support an increase in the provision of specialist sites for gypsies and travellers to better meet the need to address overcrowding on the existing Lynton Close site and the need to move into bricks and mortar accommodation. A proactive approach by the Council to encourage provision of sites is likely to better meet needs than would otherwise be the case. This will improve a number of associated objectives that relate to quality of life related to the lack of specific sites with facilities to meet needs which impact on issues such as social exclusion, health, accessibility to services and educational attainment, whilst potentially addressing issues such as sporadic use of open space as temporary stopping places. These

impacts are disproportionately higher in gypsy and traveller communities particularly where a lack of sites requires a consistent short stay itinerant existence to be perpetuated.

The policy will have neutral impacts on, traffic, waste, water, air pollution, bio-diversity, townscape, historic environment, climate change, soil, greenhouse gas emissions, flood risk, employment opportunities and skills and infrastructure. There is unlikely to be any significant variation between the provision of gypsy and travellers' sites compared to residential accommodation on outcomes in relation to these particular objectives.

In relation to race the policy is likely to have a positive impact on those with a race protected characteristic. On age, disability, sex, marriage and civil partnership, pregnancy and maternity, gender reassignment, religion and belief and sexual orientation the policy will have uncertain impacts on those with a protected characteristic. The policy should increase the opportunity to meet any identified need for pitches. This will be of benefit to the gypsy and traveller community, therefore leading to a positive impact on those with this race protected characteristic. Providing more sites could however impact on the provision of other affordable needs as it will be argued that such provision impacts on development viability, or takes up considerably more space than an equivalent number of mainstream affordable homes to meet needs. As there is limited land and funding for affordable dwellings, this could have consequential adverse impacts on some groups with protected characteristics that are more likely to be reliant on mainstream affordable housing than the general population which provision of traveller sites could reduce.

Alternative Policy: No policy

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	0	-	-	0	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Not having a policy regarding Gypsy and Traveller Accommodation is likely to have a negative impact in terms of social indicators. Not having such a policy would mean that no sites would be designated, reducing the likelihood of provision and meeting local need. This would reduce these minority groups' sense of inclusion and their stake in society.

Not having a policy regarding Gypsy and Traveller Accommodation is likely to have a neutral impact in terms of environmental and economic indicators.

This approach is not considered to be appropriate, as it would not be regarded as being in general conformity with the London Plan and national Planning Policy for Gypsy and Traveller Sites.

In relation to race, this approach is likely to have a negative impact on those with a race protected characteristic. On age, disability, sex, marriage and civil partnership, pregnancy and maternity, gender reassignment, religion and belief, and sexual orientation the policy will have neutral impacts on those with a protected characteristic. Not seeking to accommodate the identified needs for any additional pitches, or seeking to retain the existing Lynton Close traveller's site, may lead to an under-provision of pitches, which could lead to a negative impact on this protected group.

Alternative Policy: To identify a target but not prioritise any particular site through use of a criteria based policy only.

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	0	-	-	0	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

The policy will have negative impacts with regards to social inclusion, housing, quality of surroundings and community identity. The primary issues related to this policy revolve around social inclusion. Although this policy would seek to identify a target for site provision, it would not actually designate any potential sites, reducing the likelihood of provision and meeting the proposed target. This would serve to reduce the provision of pitches for these minority groups which will not help meet their specific cultural needs, reducing their sense of inclusion and their stake in society in the process.

This policy will have neutral impacts on well-being, crime, accessibility, traffic, waste, resources, environmental health, biodiversity, landscape and townscape, heritage, climate change mitigation and adaption, land and soil, open spaces, flood risk, regeneration, employment, investment, education, and efficient infrastructure.

In relation to race the policy is likely to have a positive impact on those with a race protected characteristic. On age, disability, sex, marriage and civil partnership, pregnancy and maternity, gender reassignment, religion and belief, and sexual orientation the policy will have uncertain impacts on those with a protected characteristic. The policy should increase the opportunity to meet any identified need for pitches. This will be of benefit to the gypsy and traveller community. The potential benefits however are unlikely to be as great as the preferred option as securing sites for delivery would be much less likely. Providing more sites could however impact on the provision of other affordable needs as it will be argued that such provision impacts on development viability, or takes up considerably more space than an equivalent number of mainstream affordable homes to meet needs. As there is limited land and funding for affordable dwellings, this could have consequential adverse impacts on some groups with protected characteristics that are more likely to be reliant on mainstream affordable housing than the general population which provision of traveller sites could reduce.

Conclusion: The proposed policy performs much better than the alternative, having positive impacts against a wide range of criteria. The policy enforces the consideration of specialist sites for Gypsy and Traveller needs and identifies a site which should be retained for such a use. The alternative does not do this, providing no guidance on how development proposals should incorporate the provision of sites for this particular need, simply providing a target which will not be met without the necessary emphasis on process.

Policy: BH10 RESISTING HOUSING LOSS																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	+	+	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
The policy will have positive impacts in relation to social inclusion, health, homes that meet needs and diversity. The policy will seek to maintain homes where possible but to allow for the limited loss of dwellings to provide for family homes, bring homes up to space standards or provide necessary infrastructure. Whilst it might result in some loss of housing, affecting overall home numbers this would provide for better quality homes that better meet priority needs in the borough and also necessary infrastructure facilities that will generally support an improvement in the quality of life. This will improve a number of associated objectives that relate to quality of life which impact on issues such as social exclusion, health, homes that meet needs and potentially diversity related to ethnic background such as larger family sizes and need for places of workshop/ community facilities for groups. The policy will have neutral impacts on high quality environment, community safety, accessibility, open spaces and education traffic, waste, water, air pollution, bio-diversity, townscape, historic environment, climate change, soil, greenhouse gas emissions, flood risk, employment opportunities and skills and infrastructure. Given the likely take up of policy and the fact is would mostly relate to a change in configuration/use of an existing building, impacts are likely to be small against these matters and have neutral impact. In relation to race, disability and pregnancy and maternity the policy is likely to have a positive impact on those with a protected characteristic. On age, sex, marriage and civil partnership, gender reassignment, religion and belief and sexual orientation the policy will have a neutral impact on those with a protected characteristic. The policy seeks to protect homes from loss, thus ensuring overall that housing targets are more likely to be achieved. The criteria for loss will allow for better family homes and better quality homes to be delivered, replacing in some cases poor stock. This is more likely to be of benefit to race (extended families accommodated in larger homes) maternity and pregnancy (larger homes to accommodate families) and disability (replacement of																								

substandard stock – usually with insufficient mobility standards/ size). The loss of dwellings allowed through this policy however is likely to be very small, so there will be no wider impacts in terms of other protected characteristics.

Alternative Policy: No policy

I/A Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	-	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Not having a policy is likely to have a mixed impact in terms of social indicators, but mainly negative. While not having a policy may mean that fewer homes are de-converted to family sized dwellings (therefore resulting in reduced net housing loss), the benefits of this would be outweighed by the retention of sub-standard accommodation, which can have a negative impact on health and wellbeing.

Not having a policy is likely to have neutral impacts in terms of environmental and social indicators, as impacts are likely to be the same as they are currently.

Not having a policy is not considered to be appropriate, as it would not be regarded as being in general conformity with the London Plan.

Not having a policy is likely to have a negative impact in relation to race, disability, pregnancy and maternity. Not having a policy is considered to have a neutral impact in relation to age, sex, marriage and civil partnership, gender reassignment, religion and belief and sexual orientation. Not having a policy to manage the loss of residential dwellings would mean that there would not be any criteria to allow for better family homes and better quality homes to be delivered, in some cases replacing poor stock. This is more likely to negatively impact the following groups: race (extended families accommodated in larger homes) maternity and pregnancy (larger homes to accommodate families) and disability (replacement of substandard stock – usually with insufficient mobility standards/ size).

Alternative Policy: Developments resulting in a net loss of dwellings will only be considered whereby they are replacing units which are not in-keeping with local character AND replace units which do not meet an identified need within the borough with units that do.

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	+	+	+	+	0	+	-	0	?	0	+	+	?	+	0	0	+	+	+	0	0	0

This policy approach has the potential to positively impact social inclusion, health and well-being, housing, quality of surrounds, community safety, community identity, traffic, flood risks, regeneration, and employment. Socially the policy may serve to increase the provision of certain housing needs within the borough, such as affordable housing and 3 bed family units which will help to increase social inclusion. This policy would disproportionately benefit those with specialist housing requirements, such as the elderly or physically disabled, helping to improve their life chances, increasing equality for those with protected characteristics within the borough. The benefits of redevelopment will also act to improve the character of an area, improving the public domain through the receipt of additional CIL, increasing resident's sense of place and potentially reducing crime in the process. Environmentally speaking the new developments may be able to reduce parking provision, decreasing levels of traffic and associated pollution, improving local character conformity, and increasing mitigation against flooding and storm events through the provision of sustainable measures such as SUDS. Economically the policy has potential to increase the provision of affordable housing and other housing needs, helping residents with their resilience to economic change and, as such, local businesses too due to access to a more stable workforce.

This policy may negatively impact waste management. As this policy will lead to an increase in developments there will be an associated increase in the accumulation of waste.

It is uncertain as to how the policy will impact environmental health, and climate change mitigation. This is due to a lack of insight into the potential cost benefit analysis of conflicting impacts. For instance, although the development has the potential to reduce pollution from traffic due to the decreased provision of parking spaces, the construction process itself will be heavily polluting in all respects. The same is true for the mitigation of climate change, for although the building may be built with more sustainable features, it is uncertain as to whether or not these outweigh the potential increase in CO2 caused by redevelopment.

This policy will have neutral impacts on accessibility, resources, biodiversity, land and soil, open spaces, investment, education, and efficient infrastructure.

In relation to race, disability and pregnancy and maternity the policy is likely to have a positive impact on those with a protected characteristic. On age, sex, marriage and civil partnership, gender reassignment, religion and belief and sexual orientation the policy will have a neutral impact on those with a protected characteristic. The policy seeks to protect homes from loss, thus ensuring overall that housing targets are more likely to be achieved. The criteria for loss will allow for better family homes and better

quality homes to be delivered, replacing in some cases poor stock. This is more likely to be of benefit to race (extended families accommodated in larger homes) maternity and pregnancy (larger homes to accommodate families) and disability (replacement of substandard stock – usually with insufficient mobility standards/ size). The loss of dwellings allowed through this policy however is likely to be very small, so there will be no wider impacts in terms of other protected characteristics.

Conclusion: The proposed policy is seen to be the most appropriate for Brent, providing the potential to positively impact a number of key criteria. The proposed policy considers a wide range of factors, including the conversion to 3-bedroom dwelling houses which is an identified borough need and the increased conformity with local character. Housing is also allowed to be lost where it is replaced with required local infrastructure, such as that of a needed community centre which will positively impact the local community.

Policy: BH11 CONVERSION OF FAMILY SIZED DWELLINGS

I/A Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	+	+	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0

The policy will have positive impacts in relation to social inclusion, health, homes that meet needs, diversity and education. The policy will seek to maintain family homes where possible but to allow for the provision of new homes where the size of the building allows it. The addition of new homes and maintenance of family dwellings will meet priority needs in the borough. This will maintain or improve a number of associated objectives that relate to quality of life which impact on issues such as social exclusion, health, homes that meet needs, education due to a less cramped home environment and potentially diversity related to ethnic background such as larger family sizes.

The policy will have neutral impacts on high quality environment, community safety, accessibility, open spaces and education traffic, waste, water, air pollution, bio-diversity, townscape, historic environment, climate change, soil, greenhouse gas emissions, flood risk, employment opportunities and skills and infrastructure. Given the likely take up of policy and the fact is would mostly relate to a change in configuration/ use of an existing building, impacts are likely to be small against these matters and have neutral impact

In relation to race, pregnancy and maternity and age, the policy is likely to have a positive impact on those with a protected characteristic. On disability, sex, marriage and civil partnership, gender reassign and belief and sexual orientation the policy will have a neutral impact on those with a protected characteristic. The policy seeks to protect family homes from loss and their re-

provision in any development through good access to amenity space, thus ensuring overall that housing targets are more likely to be achieved. The criteria for loss will allow for family homes to be retained. This is more likely to be of benefit to race (extended families accommodated in larger homes) and maternity and pregnancy (larger homes to accommodate families). The policy also supports parents being able to divide their home to provide for their children to have their own home and keep support close for both younger and older family members. In relation to other protected characteristics, no negative impacts have been identified. Minimum design standards would still apply, in accordance with other policies.

Alternative Policy: No policy

I/A Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	-	-	0	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	0

In relation to social indicators, not having a policy regarding the conversion of family-sized dwellings is likely to have an overall negative impact. Not having a policy may result in the loss of family homes or lack of provision of new homes where the size of the building allows for it. This could have a negative impact in relation to quality of life, impacting on issues such as social exclusion, health, homes that meet needs, education due to a less cramped home environment and potentially diversity related to ethnic background such as larger family sizes.

Not having a policy is likely to have mainly neutral impacts in terms of environmental and economic indicators as impacts are likely to be the same as they are currently. However, as noted above, there may be a negative impact in terms of education due to families being potentially being required to live in cramped home environments.

Not having a policy is not considered to be appropriate, as this would not be regarded as being in general conformity with the London Plan.

In relation to race and pregnancy and maternity and age, not having a policy is likely to have a negative impact. On disability, sex, marriage and civil partnership, gender reassignment, religion and belief and sexual orientation, not having a policy is likely to have a neutral impact. Not having a policy means that family-sized homes will have less protection from development which may negatively impact the protected characteristics of race (extended families accommodated in larger homes) and maternity and pregnancy (larger homes to accommodate families). It may also reduce the opportunities for families to subdivide homes to allow for their children to have their own home, reducing the opportunity for younger people to get on the property ladder.

Alternative Policy: Conversion of family sized dwellings will only be considered in areas with a PTAL rating of 4 or greater.

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	0	+	-	0	-	-	+	+	0	-	+	+	0	0	+	+	+	0	0	+	0	+	0	+

The policy may serve to positively impact health and well-being, accessibility, traffic, environmental health, biodiversity, climate change mitigation and adaption, soil, growth, investment, and infrastructure. These impacts are associated with increased development densities within high PTAL areas, which may serve to decrease traffic and pollution, increase accessibility to local goods and services, increasing town centre viability and promoting investment within the borough improving local job prospects. It also

corresponds to the reduced demand on land elsewhere within the borough, allowing for the retention of greenspace and a reduction in the potential increase of impermeable land.

The policy may negatively impact housing, crime, community identity, and water resources. The primary concern with the implementation of this policy would be the reduction in larger housing units which can facilitate family occupation which is an identified need within the borough. A reduction in families occupying an area may inadvertently lead to an increase in crime. The increase in housing densities will also lead to an increased demand on the water supply and sewer capacity.

This policy will have neutral impacts on social inclusion, quality of surroundings, waste, landscape and townscape, heritage, open spaces, flood risk, employment, and education.

In relation to race, disability and pregnancy and maternity the policy is likely to have a positive impact on those with a protected characteristic. On age, sex, marriage and civil partnership, gender reassignment, religion and belief and sexual orientation the policy will a neutral impact on those with a protected characteristic. The policy seeks to protect family homes from loss and their re-provision in any development through good access to public transport, amenity space, thus ensuring overall that housing targets are more likely to be achieved. The criteria for loss will allow for family homes to be retained. This is more likely to be of benefit to race (extended families accommodated in larger homes) and maternity and pregnancy (larger homes to accommodate families). In relation to these protected characteristics and the disabled, good access to public transport will be beneficial as these groups are more likely to be reliant on public transport, walking and cycling to access services/ facilities. For those with other protected characteristics, no negative impacts have been identified.

Alternative Policy: Conversion of smaller properties than 130 sq.m. allowed.

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	-	-	0	-	0	-	0	-	-	+	-	0	+	+	+	0	0	0	0	0	0	-

This policy approach will have a positive impact with regards to biodiversity, townscape, heritage, climate change mitigation and adaption, and soil. These impacts are all environmental and are associated with a reduced need to develop greenfield land through the intensification of already developed sites, and improving heating efficiency by reducing dwelling size and increasing occupation.

This policy approach will have a negative impact with regards to inequalities, well-being, housing, quality of surroundings, community identity, traffic, water resources, environmental health, and infrastructure. These impacts arise from the reduced standards in living conditions which may impact health and life satisfaction, disproportionately impacting those from certain societal sub-groups, reducing peoples pride for an area and resulting in its neglect by residents. The policy also serves to increase potential family units for conversion which will reduce family dwellings overall, leading to the reduction of a borough need. The policy does not specify which areas this policy should apply to and therefore captures sites outside of higher PTAL levels, resulting in the increased dependence upon personal vehicles, increasing traffic and pollution.

This policy is predicated to have neutral impacts on crime, accessibility waste, heritage, open space, flood risk, regeneration, employment, investment, and education.

In relation to age, race, disability and pregnancy and maternity, sex, marriage and civil partnership, gender reassigned and belief and sexual orientation the policy will have a neutral impact on those with a protected characteristic. The policy seeks to protect family homes from loss and their re-provision in any development. The policy could however result in substandard sized dwellings, as it could result in the promotion of dwellings that are too small to meet the London Plan standards.

Conclusion: The proposed policy is seen as most appropriate for Brent and has a number of positive impacts. The proposed policy will not lead to a reduction in family dwelling units which is an identified need within the borough, whereas the alternative policies would both lead to a reduction in its provision. The proposed policy also allows for exceptions to be made (where amenity space is so deficient that family occupation is unlikely and could not be reasonably changed to overcome such deficiencies) rather than applying a blanket rule, allowing for potential outliers requiring conversion despite not explicitly meeting the required criteria.

Preferred Policy: POLICY BH12 RESIDENTIAL OUTBUILDINGS

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	+	+	+	0	0	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0

The policy will have positive impacts in relation to social inclusion, health, homes that meet needs, high quality environment, community safety and diversity. The policy will seek to ensure that residential outbuildings are not used as living accommodation, or

encourage greater occupation of homes than they were designed for. This will ensure that vulnerable people, which experience shows are often recent immigrants with limited options are not taken advantage of and exploited by poor quality landlords making them over-occupy properties, often with dangerous implications for safety and adverse impacts on neighbours' amenity related to issues such as waste management/ environmental quality. This will maintain or improve a number of associated objectives that relate to quality of life which impact on issues such as social exclusion, health, homes that meet needs and diversity.

The policy will have neutral impacts on accessibility, open spaces, traffic, waste, water, air pollution, bio-diversity, townscape, historic environment, climate change, soil, greenhouse gas emissions, flood risk, employment opportunities, education and skills and infrastructure. As the policy relates to existing residential properties, its impacts on these matters is likely to be very limited.

In relation to race, age, and disability, the policy is likely to have a positive impact. On pregnancy and maternity, sex, marriage and civil partnership, gender reassignment, religion and belief and sexual orientation the policy will have a neutral impact. The policy seeks to reduce the potential for poor quality residential accommodation to be provided in outbuildings, or for a home to be over-occupied by transferring elements normally included in a home (toilets, washing facilities, etc.) to outbuildings to allow other rooms to be let as bedrooms. The policy is likely to be beneficial in terms of race, as it is often minority groups (usually recent immigrants) that are more likely to be taken advantage of by unscrupulous landlords and put in over-crowded/ poor quality accommodation. There may also be positive impacts for modern slavery victims, victims of trafficking and asylum seekers, and on the protected characteristic of age as young people may be more affected by higher housing costs and therefore renting inappropriate outbuildings for residential purposes. For other protected characteristics there may be slight benefits, particularly for the disabled or others who may have lower incomes as the use of outbuildings as residential accommodation can result in sub-standard residential accommodation but the numbers are likely to be small.

Alternative Policy: No policy

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	-	-	-	0	0	0	0	0	0	0	-	0	0	0	0	0	0	0	0	0	0	0

Impacts are likely to be negative in terms of social indicators. Not having a policy would reduce the council's ability to ensure that residential outbuildings are not used as living accommodation. This may have a detrimental impact on vulnerable people, which experience shows are often recent immigrants with limited options, as not having a policy reduces the chance to ensure that vulnerable people are not taken advantage of and exploited by poor quality landlords, often with dangerous implications for safety and adverse impacts on neighbours' amenity. This would impact a number of objectives relating to quality of life, in turn impacting on issues such as social exclusion, health, homes that meet needs and diversity.

Impacts are likely to be mainly neutral in terms of environmental and economic impacts. Not having a policy relates to existing residential properties, therefore impacts are likely to be limited. However, there is potential for a slight negative environmental impact in terms of creating, enhancing and maintaining attractive and clean environments.

Not having a policy is not considered to be appropriate, as it may encourage many problems associated with the misuse of residential outbuildings.

Not having a policy is likely to have a negative impact in relation to race and disability. Not having a policy is likely to have a neutral impact in relation to age, pregnancy and maternity, sex, marriage and civil partnership, gender reassignment, religion and belief and sexual orientation. Not having a policy is likely to reduce the potential to prevent poor quality residential accommodation being provided in outbuildings, or for a home to be over-occupied by transferring elements normally included in a home (toilets, washing facilities, etc.) to outbuildings to allow other rooms to be let as bedrooms. Not having a policy may potentially therefore have a detrimental impact in terms of race, as it is often minority groups (usually recent immigrants) that are more likely to be taken advantage of by unscrupulous landlords and put in over-crowded/ poor quality accommodation. For other protected characteristics there may also be slight negative impacts, particularly for the disabled or others who may have lower incomes.

Alternative Policy: To allow conversion of outbuildings in situations which enhance the accessibility of care provision for dependant family members. Conversion must include the development of facilities which help the disabled in their day to day lives and do not lead to compromises in living conditions.

I/A Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	+	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

The policy has the potential to positively impact inequalities, health and well-being, housing, and traffic. This policy may allow those whom already care for dependant family members to do so in their own homes, whilst also providing the dependant individual with their own space. This will serve to improve both accessibility to care, and housing conditions for those whom provide the care. Providing dependants with outsourced care isn't always an economically viable option for families and this policy may provide a more appealing alternative for both parties. It will also serve as a potential halfway point for those which are semi-dependant and still have, and wish to maintain, their independence to some degree. This may also serve to reduce journeys made by personal vehicles by reducing the need of carers to travel off site to attend to their relative's needs. This policy will be of primary benefit to the elderly and those with disabilities, helping to improve their life chances and satisfaction.

This policy will have neutral impacts on quality of surroundings, crime, community identity, accessibility, waste, resources, environmental health, biodiversity, landscape and townscape, heritage, climate change mitigation and adaption, land and soil, open spaces, flood risk, regeneration, employment, investment, education, and efficient infrastructure.

In relation to disability and race the policy will have a positive impact. In relation to age, sex, pregnancy and maternity, marriage and civil partnership, gender reassignment, religion and belief and sexual orientation the policy will have a neutral impact on those with a protected characteristic. The policy would allow for the needs for disabled people to be better met, which would be positive for them and also their carers who are more likely to be women. The policy would still restrict the ability of ethnic minorities who are more likely to be exploited by unscrupulous landlords from occurring.

Conclusion: The proposed policy is seen to be most appropriate for Brent, having numerous positive impacts. Whilst an alternative of allowing exceptions for disabled households might appear to offer potential benefits to that group, it would also allow for the potential abuse by those seeking to game the system. In cases where there is a disabled occupier an extension is likely to be the best solution in any case to allow for closer proximity of carers. The proposed policy will hopefully lead to a reduction in use of inappropriate outbuildings for residential purposes which has led to overcrowding and poor general well-being of affected residents.

Preferred Policy: POLICY BH13 RESIDENTIAL AMENITY SPACE

I/A Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5

	+	+	+	+	0	0	0	0	0	0	0	+	+	0	0	+	0	0	0	0	0	0	0	0
The policy will have positive impacts in relation to social inclusion, health, homes that meet needs, high quality environment, community safety, bio-diversity, townscape and climate change. The policy will seek to ensure that residential dwellings are provided with a larger amount of amenity space than London Plan minimum requirements. This will have positive outcomes in making homes allow for better opportunities to occupiers to use outside space to socialise as a family and with neighbours, for recreational activities, etc., and as such the home is likely to better meet their needs. In addition, much of this amenity space will benefit from soft landscaping which will have environmental benefits in terms of adding to place, townscape, biodiversity and climate change. It will also ensure that people with more limited means are able to access good quality amenity space with their homes, rather than this only being available to those who are more likely to be able to afford it. This will maintain or improve a number of associated objectives that relate to quality of life which impact on issues such as social exclusion, health, homes that meet needs and diversity. The policy will have neutral impacts on accessibility, open spaces, traffic, waste, water, air pollution, historic environment, soil, greenhouse gas emissions, flood risk, employment opportunities, education, diversity and skills and infrastructure. As the policy relates to existing residential properties, its impacts on these matters is likely to be very limited. In relation to disability, age, pregnancy and maternity and race the policy will have a positive impact. On sex, marriage and civil partnership, gender reassignment, religion and belief and sexual orientation the seeks to ensure adequate provision of amenity space and for it to be accessible, and larger for family sized dwellings. This will be better for younger and older people who are more likely to take advantage of amenity space, for race as black and minority ethnic groups are likely to have larger families/ more children, pregnancy and maternity as it will benefit those with babies and small children, and also for the disabled as it allows space to be accessible close to home. Whilst the availability and access to amenity space will be beneficial to the population as a whole, for the other protected characteristics it is unlikely to have additional benefits. Viability and other assessment indicates that the policy does not undermine provision of homes as the amenity space helps to also address other policy requirements such as greening/ bio-diversity and surface water attenuation.																								
Alternative Policy: No policy																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	+	-	0	0	0	0	0	0	-	-	-	0	0	-	0	0	0	0	0	0	0	0

Not having a policy is likely to have a mainly negative impact on social indicators. Not having a policy regarding residential amenity space could result in increased dwelling numbers with associated improvements for viability potentially allowing for some more affordable housing to be provided, thereby having a positive impact on housing delivery. However, there would be other negative social impacts, by creating larger inequalities in access to general amenity provision between the most and least well off residents, with more affordable dwellings meeting standards and more expensive dwellings exceeding them. Reduced amenity space is likely to negatively impact residents' health due to the lower potential for physical activity that they facilitate, leading to a decrease in resident satisfaction.

Not having a policy will have some negative impacts on environmental indicators, and some neutral. Not having a policy would impact the provision of the associated soft landscaping, potentially reducing biodiversity and the environmental benefits related to this and the general appearance of the townscape.

Impacts are likely to be neutral in relation to economic indicators.

Not having a policy is not considered to be appropriate, as it will likely result in minimum standards which are consistent with inner London characteristics being delivered in most cases.

Not having a policy is likely to have a negative impact in relation to disability, age and race. Not having a policy is likely to have a neutral impact in terms of pregnancy and maternity, sex, marriage and civil partnership, gender reassignment, religion and belief and sexual orientation. Not having a policy regarding residential amenity space will likely result in minimum standards, which may result in lack of adequate provision of accessible amenity space, or amenity space suitable for larger family sized dwellings. This would negatively impact younger and older people who are more likely to take advantage of amenity space, for race as black and minority ethnic groups are likely to have larger families/ more children and also for the disabled as it allows space to be accessible close to home. Whilst the availability and access to amenity space will be beneficial to the population as a whole, for the other protected characteristics it is unlikely to have additional benefits.

Alternative Policy: Require mid-point between proposed policy and London Plan minimums.

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	+	-	-	-	0	0	0	0	0	-	-	0	0	0	0	0	0	0	0	0	0	0

The policy has the potential to positively impact housing. By decreasing the required provision of amenity space this policy may increase the viability of greater levels of affordable housing.

This policy is likely to negatively affect inequalities, health and well-being, quality of surroundings, crime, community identity, biodiversity, and townscape. The negative impact of this policy will primarily be social, creating larger inequalities in access to general amenity provision between the most and least well off residents, with more affordable dwellings meeting standards and more expensive dwellings exceeding them. Reduced amenity space is likely to negatively impact resident's health due to the lower potential for physical activity that they facilitate, leading to a decrease in resident satisfaction. The policy will also impact the provision of the associated soft landscaping, potentially reducing biodiversity and the environmental benefits related to this and the general appearance of the townscape.

This policy will have neutral impacts on accessibility, waste, resources, environmental health, heritage, climate change mitigation and adaption, land and soil, open spaces, flood risk, regeneration, employment, investment, education, and efficient infrastructure.

In relation to disability, age, and race the policy will have a positive impact. On pregnancy and maternity, sex, marriage and civil partnership, gender reassignment, religion and belief and sexual orientation the policy will not have a neutral impact. The policy seeks to ensure better provision of amenity space than the minimum required in the London Plan and for it to be accessible, and larger for family sized dwellings. This will be better for younger and older people who are more likely to take advantage of amenity space, for race as black and minority ethnic groups are likely to have larger families/ more children and also for the disabled as it allows space to be accessible close to home. Whilst the availability and access to amenity space will be beneficial to the population as a whole, for the other protected characteristics it is unlikely to have additional benefits. The benefits are less than the preferred policy.

Alternative Policy: Require greater than policy requirements.

I/A Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	+	-	+	0	+	-	-	0	0	0	+	+	0	0	+	+	+	+	-	-	-	0	-

This policy may serve to positively affect health and well-being, quality of surroundings, community identity, biodiversity, townscape, climate change adaptation, soil, open space and flood risk. Socially, this policy will improve access to sufficient amenity space for all, not just the privileged, increasing satisfaction and reducing inequalities within the borough. The increased provision of soft landscaping will positively affect biodiversity levels, townscapes, and resilience to storm events through increased permeability and associated decreased flooding potential.

Negative impacts will be with regards to inequalities, housing, accessibility, traffic, regeneration, employment, investment, and efficient infrastructure. Increased space standards are likely to raise the costs of living to residents as the costs of development are passed onto the customers. This will reduce viability of housing projects, decreasing both housing provision and provision of affordable housing as a whole and as a percentage, increasing inequalities overall. The increased space required for development will likely push developments away from town centres where land is scarce, and into lower PTAL areas. This will directly affect the accessibility to essential services, increasing reliance on traffic and decreasing town centre viability through a reduction in density and associated footfall.

This policy will have neutral impacts on crime, waste, resources, environmental health, heritage, climate change mitigation, and education.

In relation to disability, age, and race the policy will have a positive impact. On pregnancy and maternity, sex, marriage and civil partnership, gender reassignment, religion and belief and sexual orientation the policy will have a neutral impact. The policy seeks to ensure significant provision of amenity space and for it to be accessible, and larger for family sized dwellings. This will be better for younger and older people who are more likely to take advantage of amenity space, for race as black and minority ethnic groups are likely to have larger families/ more children and also for the disabled as it allows space to be accessible close to home. Whilst the availability and access to amenity space will be beneficial to the population as a whole, for the other protected characteristics it is unlikely to have additional benefits. The need to provide significantly greater amenity space than the preferred policy is likely to impact on site capacity and viability of developments, thus reducing overall housing numbers/affordable housing. This potentially could impact on all those with protected characteristics who are more likely to be dependent on affordable housing in particular, however the impacts cannot be quantified at this time.

Conclusion: The proposed policy is seen to be the most appropriate for Brent, having a wide range of potential positive impacts. The proposed policy seeks to provide sufficient levels of amenity space for all residents which will incur benefits, the reduction of this provision will likely lead to social inequalities. The provision of greater levels of amenity space than the preferred policy is not seen as desirable within Brent and would serve to increase development costs, reducing viability and the provision of affordable housing which would outweigh the gains seen from increased amenity space.

Social Infrastructure and Community Facilities

Policy: BSI1 SOCIAL INFRASTRUCTURE & COMMUNITY FACILITIES																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	++	++	0	+	+	++	+	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	n/a
Impacts are positive in relation to promoting social inclusion and narrowing inequalities, improving the health of the population, providing a safe, high quality and healthy environment, crime reduction and prevention, engagement in high quality community services and facilities, the vitality and viability of Brent’s town centres and traffic reduction. By protecting and retaining existing community facilities unless it can be demonstrated that there is no longer a community need, the policy will ensure an adequate provision of community facilities to meet the needs of Brent’s existing and future population. This policy places requirements on new social infrastructure and community facilities to be easily accessible, located in flexible and adaptable buildings and to maximise the benefit of facilities to the wider community. To promote community cohesion and the best use of land this policy will seek the multiple use of new premises.																								
Impacts are neutral in relation to providing everybody with the opportunity to live in a home which is suitable to their identified needs. Although the policy does promote the conversion of community facilities to alternative uses including specialist housing before other uses are considered, this is unlikely to provide significant numbers of new specialist housing.																								
This policy is not applicable to objectives relating to waste production, water quality, air, noise and light pollution, conserving and enhancing the borough’s natural habitats, protecting and enhancing the borough’s landscape and townscape, the historic environment and cultural assets, climate change and reduction of greenhouse gases, soil quality, protecting open space, flood risk reduction, promoting sustainable economic growth, maximising the potential for everybody to contribute economically, indigenous and inward investment within the borough and encouraging efficient infrastructure to support economic growth.																								
This policy will have a neutral impact on people who have the following protected characteristics: disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation, age. Social infrastructure plays a vital part in access to services for the old, young, and disabled as well as providing religious facilities for worshippers and those wishing to marry or enter into a civil partnership. Other protected groups such as sexual orientation and gender reassignment often access services provided in these facilities and so will also be positively affected by their provision.																								

Alternative Policy: No policy to manage social infrastructure and community facilities, relying on London Plan policy																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	++	++	0	+	+	++	+	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	n/a
Impacts are positive in relation to promoting social inclusion and narrowing inequalities, improving the health of the population, providing a safe, high quality and healthy environment, crime reduction and prevention, engagement in high quality community services and facilities, the vitality and viability of Brent’s town centres and traffic reduction. By protecting and retaining existing community facilities unless it can be demonstrated that there is no longer a community need, the policy will ensure an adequate provision of community facilities to meet the needs of Brent’s existing and future population. This policy places requirements on new social infrastructure and community facilities to be easily accessible, located in flexible and adaptable buildings and to maximise the benefit of facilities to the wider community. To promote community cohesion and the best use of land this policy will seek the multiple use of new premises.																								
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Conclusion: The provision and retention of social infrastructure will be essential over the Local Plan period to support the high levels of population growth predicted in Brent and the wider region. The Assessment indicates that the policy has a number of positive impacts and that the impacts of the preferred policy are generally equal to the reasonable alternative, as the London Plan contains detailed policies across a range of social infrastructure categories. However, the proposed policy is seen as the most appropriate for Brent as it adds some detail on which forms of social infrastructure are most needed in the borough, which may differ from the wider London area.

Economy and Town Centres

Policy BE1: Economic Growth and Employment Opportunities for All

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	++	+	+	?	+	+	?	+	-	?	?	0	0	0	-	-	0	0	0	++	++	+	+	+

Impacts in relation to social objectives are overall positive. The overarching purpose of the policy is to create employment and training opportunities for Brent residents and secure workspace to support business and enterprise. Increasing access to employment increases income and in turn reduces poverty and social exclusion. Increased income has health and well-being benefits as it can help alleviate fuel poverty, increase access to good quality housing, and reduce social isolation by increasing opportunities to participate in sport and leisure. This can also help to alleviate mental health pressures associated with low income. Levels of unemployment are higher amongst women in the borough. This policy may therefore have scope to be of greater benefit to this group, however, this will be dependent on targeted employment, apprenticeships and training. The policy seeks affordable B use class workspace in the growth areas of Alperton, Burnt Oak Colindale, Church End, Neasden, Staples Corner and Wembley, and additional workspace opportunities in South Kilburn Growth area to be sought. The majority of these growth areas are located in areas in the top 20% most deprived in the country. Therefore, this policy has potential to benefit those facing higher levels of deprivation.

Workspace and cultural and creative industries can help contribute to an areas sense of place, with potential positive impacts. However, workspace can also generate noise. Impacts on quality of surroundings are therefore uncertain and dependant on detailed design. Increasing employment can help to reduce poverty which can be a contributing factor to some crimes. The inclusion of workspace in development can also create 'eyes on the street' during the day which can help to improve feelings of safety. Positive impacts are therefore predicted against objectives S5 and S6.

Integration of workspace in town centres could help promote their vitality and viability by creating a wider customer base. In addition, enhancing educational quarters in Wembley, Willesden and Northwick Park will help to extent the customer base of nearby town centres. However, this is dependent on a centres ability to attract these customers therefore impacts are uncertain.

Impacts will be uncertain in relation to the environment. Including workspace in mixed-use development can reduce the need to travel to work and reduce pressure on the transport network. Although travel into the borough for employment may also increase, workspace is to be directed to growth areas and town centres which have good public transport accessibility levels. Therefore, overall impacts are anticipated to be positive. Increasing employment and business in the borough has the potential to generate noise, waste and impact on water and air quality. Although sectors such as creative industries can be less intensive and polluting than traditional industries, there is still potential for pollution which will need to be mitigated.

Economic impacts are anticipated to be positive. This is to be expected given the purpose of the policy is to promote employment and economic growth. The policy will secure new affordable workspace, which will help SME businesses develop in the borough. In particular, the policy will help to promote creative industries which is a future growth sector. Targeted employment, apprenticeships and training will help reduce unemployment, provide job opportunities and improve qualifications and skills of the population. Locating workspace in the areas of most significant housing growth has the potential to reduce commuting and journey time. This is dependent on the people living within the development and surrounding area being able to access those jobs, but as the borough's growth areas benefit from good public transport accessibility this policy is anticipated to have positive impacts overall.

It is considered that this policy will have a neutral impact on people who have the following protected characteristics: gender reassignment, marriage and civil partnership, religion and belief, sexual orientation, age, pregnancy and maternity and disability. Training opportunities will be of benefit to all groups. The policy is likely to have a positive impact on the protected characteristic race and sex - noted above, levels of employment are lower amongst women in the borough. Employment rates also differ by ethnicity with black people having the lowest employment rate. Women and BAME groups could therefore benefit from this policy, particularly through targeted employment, apprenticeship and training.

Alternative Policy: To not secure affordable workspace in Growth Areas

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5

	+	?	?	0	0	0	?	-	+	+	?	0	0	0	-	-	0	0	0	0	+	0	+	0
Impacts are uncertain in relation to social objectives. There will still be positive impacts from securing employment and training opportunities during construction. If affordable workspace is not secured there will not be employment and training opportunities in the end use. There will also be less scope to support SMEs if workspace is not secured on site. Therefore, although the policy will still have positive impacts it will be less likely to reduce poverty and social exclusion in the longer term. Meaning associated health and well-being benefits may not be fully realised. If the policy does not secure workspace it will not deliver the same benefits in terms of contributing to an areas sense of place and providing ‘eyes on the street’ during the day which can help to improve feelings of safety. Impacts will be uncertain in relation to the environment. If employment floorspace is not delivered in growth areas all occupants will need to travel to work, which could place pressure on the road network. This in turn will have negative impacts on air quality. However, there will also be less scope for noise and waste generation which can be associated with the operation of businesses. Economic impacts will be largely neutral with fewer benefits achieved. The policy will not facilitate new businesses start-ups or help future growth sectors. There will still be positive benefits associated with securing employment and training during construction, but these will be in the short to medium term. The benefits associated with mixed-use development will not be achieved including reduced commuting and inward investment from business. It is considered that this policy will have a neutral impact on people who have the following protected characteristics: gender reassignment, marriage and civil partnership, race, religion and belief, sex, sexual orientation, age, pregnancy and maternity and disability. There would be no benefits in terms of employment generation. Alternative Policy: To not promote areas of the borough as creative hubs																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	?	+	0	0	0	?	+	?	?	?	0	0	0	-	-	0	0	0	-	-	-	0	0
Impacts are uncertain in relation to social objectives. There will be a positive impact in that failure to protect creative industries could result in additional homes being delivered. However, the policy will have a negative impact in that there will be no benefits in terms of employment generation or movement towards a higher wage economy, and therefore the policy is less likely to reduce poverty and social exclusion in the long term.																								

Impacts will be uncertain in relation to the environment. If parts of the borough are not promoted as creative hubs, residents will need to travel to work, which could place pressure on the transport network. This in turn will have a negative impact on air quality. However, there will also be less scope for noise and waste generation which can be associated with the operation of businesses.

Economic impacts will be largely negative in that this policy will not generate employment or investment in the borough, and will not help move towards a higher wage economy.

It is considered that this policy will have a neutral impact on people who have the following protected characteristics: gender reassignment, marriage and civil partnership, race, religion and belief, sex, sexual orientation, age, pregnancy and maternity and disability. Although failure to protect the creative industries could result in additional homes being delivered, this does not outweigh the negative impacts on the local economy as there would be no benefits in terms of employment generation.

Policy BE2: Strategic Industrial Location (SIL) and Locally Significant Industrial Sites (LSIS)

I/A Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	?	?	+	?	+	0	0	+	0	?	-	?	+	0	?	0	+	0	0	+	?	+	0	+

Impacts are predicted to be positive or uncertain in relation to social objectives. The policy has the potential to secure new employment floorspace which could in turn increase employment and prosperity, with associated benefits to health and well-being. In the short to medium term businesses may be displaced resulting in a loss of employment, making potential impacts uncertain. In terms of housing delivery this option will have significant positive impacts as it will result in additional housing. At the moment the majority of SIL and LSIS in the borough are in a poor environmental quality. Redevelopment will improve the quality of the environment but the benefits may be negated by the potential for noise concerns from co-locating residential and employment uses. Introducing residential into employment areas will increase footfall and overlooking on an evening which can increase feelings of safety and reduce crime.

Mixed environmental impacts are predicted. Co-location can reduce the need to travel to work which can have positive impacts. Each SIL and LSIS has been scored against I/A criteria to assess its sustainability for housing. Sites identified as suitable for co-location have good public transport accessibility levels, or will benefit from future planned investment in transport infrastructure. Development in these locations will be less reliant on private vehicles and place less pressure on the transport network.

By protecting some areas of SIL and LSIS for employment uses, this allows the potential for energy from waste and the circular economy. Increasing housing and employment will generate additional waste, making overall predicted impacts neutral.

Some of Brent's SIL and LSIS sites are adjacent the Grand Union Canal. Through redevelopment there is potential to enhance the waterfront and improve water quality and biodiversity through planting and green sustainable urban drainage systems. Therefore, potential positive impacts are uncertain in relation to criteria EN3.

Employment uses can generate noise and air pollution. Locating housing next to employment uses could have negative impacts on amenity and there will be a need for this to be carefully managed. Protecting some areas of SIL and LSIS for purely industrial uses allows uses which could have the most detrimental impacts to locate elsewhere.

Redevelopment could result in enhancements to landscape setting through the creation of a higher quality environment. There are a limited number of heritage assets within Brent's industrial areas. Other policies will protect these assets commensurate with their significance therefore impacts should be neutral.

Increased development will increase energy consumption. Intensification of uses does create the scope for district heating networks and modern development is required to meet higher sustainability standards, so there may be positive impacts associated with the redevelopment of older less efficient buildings.

This has potential to introduce sensitive residential development into areas of flood risk. However, a sites suitability for co-location has been informed by an assessment of potential flood risk, making overall impacts neutral. Modern development incorporating Sustainable Urban Drained Systems could help increase permeability and reduce flood risk.

This policy promotes the efficient use of brown field land, which could have positive impacts in reducing the need to develop on green field and open space. Redevelopment would also be subject to remediation of any contamination.

Economic impacts are anticipated to be predominantly positive. Housing has higher values and therefore can help subsidise the creation of new employment floorspace. This in turn can generate job opportunities. This policy balances facilitating investment in SIL and LSIS, whilst protecting some employment sites for businesses which are not suitable for co-location. During construction there is potential that some businesses will be displaced which could have negative impacts on employment in the short to medium term, but the

policy seeks to mitigate this by ensuring there are employment sites within the borough displaced businesses could relocate to. Co-location of employment and housing will have positive benefits in reducing commuting and improving access to employment.

It is considered that this policy will have a neutral impact on people who have the following protected characteristics: gender reassignment, marriage and civil partnership, age, religion and belief, race, sex and sexual orientation. The purpose of the policy is to ensure land is fully utilised both for employment and housing. This should benefit all groups. Creating mixed neighbourhoods can create sustainable places and reduce travelling times. However, the policy could have a positive impact on the protected characteristics of sex, pregnancy and maternity and disability as it may have particular benefits to those with caring responsibilities or those with limited mobility.

Alternative Policy : To allow co-location on all SIL and LSIS sites

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	?	?	++	?	+	0	0	-	-	?	-	?	+	0	?	-	+	0	0	-	-	-	0	+

Impacts are predicted to be positive or uncertain in relation to social objectives. The policy has the potential to secure new employment floorspace which could in turn increase employment, and have benefits for prosperity and health and well-being. Although in the short to medium term businesses may be displaced resulting in a loss of employment. In terms of housing delivery this option will have significant positive impacts as it will result in additional housing, including affordable housing. Redevelopment will improve the quality of the environment. The positive impacts may be negated by the potential for noise concerns by co-locating residential and employment uses. Particularly as this policy approach would not protect any employment sites solely for 'bad neighbour' employment uses. Introducing residential into employment areas will increase footfall and overlooking on an evening which can increase feelings of safety and reduce crime.

There are predicted significant negative environmental impacts. Co-location can reduce the need to travel to work which can have positive impacts. However, some areas of SIL and LSIS do not benefit from good public transport accessibility levels. Introducing housing into these locations will place further pressure on the transport network and increase congestion. For co-location to be acceptable on all SIL and LSIS waste management uses would need to relocate outside of the borough. This would mean Brent could not meet its waste apportionment and the potential for future growth sectors such as the circular economy and energy from waste will be reduced. Some of Brent's SIL and LSIS sites are adjacent the Grand Union Canal. Brent's industrial sites are heavily urbanised and generally dominated

by impermeable surfaces. Through redevelopment there is potential to enhance the waterfront and improve water quality and biodiversity through planting and green sustainable urban drainage systems.

Employment uses can generate noise and air pollution. Locating housing next to employment uses could have negative impacts on amenity and there will be a need for this to be carefully managed. If all areas of SIL and LSIS are developed for co-location it will be necessary for the more polluting uses to be located adjacent residential, with associated amenity impacts. Redevelopment could result in enhancements to landscape setting through the creation of a higher quality environment. Other policies will protect these assets commensurate with their significance therefore impacts should be neutral. Increased development will increase energy consumption. Although intensification of uses does create the scope for district heating networks. In addition, modern development is required to meet higher sustainability standards, so there may be benefits in encouraging the redevelopment of older less efficient buildings. Some SIL and LSIS sites are susceptible to flood risk and this option would introduce sensitive residential development into these locations. This has potential positive impacts as it minimises development on greenfield sites and will result in a more efficient use of brown field land. Redevelopment would also be subject to remediation of contamination.

Economic impacts are predicted to be predominantly negative. This policy can help facilitate investment in SIL and LSIS. Housing has higher values and therefore can help subsidise the creation of new employment floorspace. This in turn can generate job opportunities. Co-location of employment and housing can have positive impacts in reducing commuting and improving accessibility to employment. Some businesses are not suitable for co-location, due to the noise and odour they generate. If all SIL and LSIS was to be developed for mixed-uses some business would need to relocate outside of the borough, with associated job losses. This would also mean the borough could not meet its identified employment needs, particularly for general industrial uses and waste management.

It is considered that this policy will have neutral impacts on people who have the following protected characteristics: gender reassignment, marriage and civil partnership, pregnancy and maternity, age, race, religion and belief, sex and sexual orientation and disability.

Alternative Policy: To protect all SIL and LSIS for employment use only

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	0	0	0	0	0	0	0	0	0	0	0	0	0	0	?	0	0	0	0	0	0	0	?	0

As this option is unlikely to change the current situation **social impacts are predicted to be neutral**. This option will not result in any additional housing. Although there may be piecemeal development, there is unlikely to be a comprehensive development for employment uses. Therefore, potential to improve environmental quality and feelings of safety under this option is considered to be neutral.

Predicted environmental impacts are largely neutral as this approach reflects the current situation. Continuing to separate housing from employment uses in SIL and LSIS will not reduce the need to travel to work. However, there will also not be an increase in private vehicle use associated with residential development. Overall impacts are therefore likely to be neutral. Protecting the sites as SIL and LSIS is unlikely to encourage environmental enhancements including planting which would benefit biodiversity and water quality. Employment uses can generate noise and air pollution. Locating housing next to employment uses could have negative impacts on amenity and there will be a need for this to be carefully managed.

Whilst this policy is unlikely to result in a significant increase in development which would generate greenhouse gas emissions, it also won't result in modern and more efficient buildings. Impacts are therefore uncertain.

Economic impacts will be neutral. This approach is unlikely to attract significant investment in SIL and LSIS, unless the supply of employment floorspace is constrained to the extent investment in intensification of employment uses becomes viable. Although this approach will protect existing businesses it is unlikely to promote intensification and the creation of new employment floorspace and associated job opportunities. This approach is the status quo, which to date has not resulted in the regeneration of SIL and LSIS through employment uses alone.

It is considered that this policy will have a neutral impact on people who have the following protected characteristics: gender reassignment, marriage and civil partnership, age, religion and belief, pregnancy and maternity, race, sex and sexual orientation, disability. There would not be the benefit to all groups from increasing housing delivery and creating mixed communities.

Conclusion: The IIA indicates co-location on SIL and LSIS whilst retaining others for employment use will result in the most positive impacts. This option strikes the balance between the need to protect some SIL and LSIS for heavier industrial uses which are not suitable for co-location, whilst enabling co-location on others. A potential negative impact is the potential for the co-location of housing and employment uses to generate noise pollution. This will need to be mitigated through the detailed design of development. The policy wording highlights the need for it to be demonstrated suitable amenity will be provided for occupiers.

Policy BE3: Local Employment Sites and Work-Live																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	++	+	+	+	+	+	-	+	0	?	+	0	0	0	+	+	0	+	+	+	0	+
Impacts are predicted to be positive in relation to social objectives. Protecting employment sites across the borough will ensure local employment opportunities. This can help reduce inequalities, and in turn help improve health and well-being. This policy option will result in increased housing, including affordable housing. Encouraging investment through new development can help improve the quality of an area. Mixed-use development creates footfall and overlooking in areas throughout the day and evening. This can help improve feelings of safety and reduce crime. SMEs are an important part of an areas character. Protecting and retaining these businesses can help foster a sense of place and pride. Where local employment sites are located in town centres intensification of use will help to increase the population of the centre and help to support its vitality and viability. Impacts against environmental impacts are mixed but overall predicted to be positive. Protecting local employment sites ensures local employment opportunities are available, and can reduce the need to travel. Although increased intensification of use will increase the production of waste. Therefore, impacts are likely to be negative in relation to criteria E2. There is a risk in locating sensitive uses such as residential next to employment of impacts on amenity, particularly from noise. Given that space will be designed to modern sound insulation standards and be air quality neutral impacts on environmental health can be mitigated. Impacts overall are therefore likely to be neutral. Modern development will enhance the quality of the public realm, townscape and will integrate sustainable urban drainage systems which can help to improve water quality. Through redevelopment a net increase in biodiversity and green infrastructure is sought, but whether this constitutes a benefit will be dependent on the existing site and the level of planting and biodiversity already present. Impacts on biodiversity are therefore dependant on the nature of the site. Where a local employment site contains a heritage asset this will be protected as appropriate by policies elsewhere in the plan, so the impacts are likely to be neutral. Whilst increased intensity of use can increase energy consumption, modern buildings are designed to higher sustainability standards. Meaning overall impacts are likely to be neutral.																								

Allowing more efficient use of land can help protect open space and greenfield sites from development pressure.

Impacts against economic impacts are predicted to be predominantly positive. In the short to medium term businesses may be displaced during development. Longer term this policy will have positive impacts by securing an increase in the amount of affordable workspace in the B use class (with makerspace prioritised to meet demand) as part of mixed-use developments which will help support business start-ups and create job opportunities. Work-Live development can also promote flexible working, which could be of particular benefit to those with caring responsibilities or disabled people with less mobility. This policy approach will help to attract investment to local employment sites. Mixed-use development and Work-Live development has the potential to reduce the need to travel, but only if those in the local community can benefit from employment opportunities.

It is considered that this policy will have a neutral impact on people who have the following protected characteristics: gender reassignment, marriage and civil partnership, age, religion and belief, pregnancy and maternity, sexual orientation. The policy could have particular positive impacts on the protected characteristics of sex, race and disability, as women and BAME groups have higher levels of unemployment and the policy will result in the creation and retention of local employment opportunities. Additionally, the policy could benefit disabled people with less mobility and those with caring responsibilities.

Alternative Policy: To allow Local Employment Sites to be lost

I/A Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	++	+	-	-	0	-	0	+	+	?	+	0	0	0	+	+	0	-	-	-	0	-

Social impacts are predicted to be mixed, but predominantly negative. Loss of local employment sites will reduce employment opportunities in the borough. Lack of secure employment can impact negatively on health and well-being. This will result in increased housing, including affordable housing. Encouraging investment through new development can help improve the quality of an area.

A loss of employment uses will result in less activity in an area during the day, which can reduce feelings of safety, resulting in negative impacts.

Loss of local businesses can be detrimental to character and sense of place. Where local employment sites are located in town centres intensification of use will help to increase the population of the centre and help to support its vitality and viability. However, this

will be countered by a loss of employment uses which can draw people to town centres during the day and contribute to a centres offer.

Environmental impacts are predicted to be overall positive. Loss of local employment opportunities could increase the need to travel. Increased production of waste from residential development, may be cancelled out by loss of employment space. Overall impacts are therefore likely to be neutral

The development will replace existing employment space with space designed to meet modern standards, including being air quality neutral. The loss of employment uses can have positive impacts in terms of reducing noise and other forms of pollution. Modern development will enhance the quality of the public realm, townscape and will integrate sustainable urban drainage systems which can help to improve water quality. Through redevelopment a net increase in biodiversity and green infrastructure is sought, but whether this constitutes a benefit will be dependent on the existing site and the level of planting and biodiversity already present. Impacts on biodiversity are therefore dependant on the nature of the site. By allowing housing development on brownfield employment sites can help protect open space and greenfield land from development pressure.

Economic impacts are predicted to be negative. This policy approach would result in the loss of employment space which will be detrimental to the local economy and result in a loss in employment. This will result in a loss of locally accessible employment opportunities, which will increase the need to travel.

It is considered that this policy will have a neutral impact on people who have the following protected characteristics: gender reassignment, marriage and civil partnership, age, religion and belief, disability, pregnancy and maternity, and sexual orientation. This policy could have a detrimental impact on groups with lower employment levels, including women and BAME groups by further reducing employment opportunities in the borough.

Alternative Policy: To protect all viable Local Employment Sites for employment use only

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	-	0	0	+	0	+	0	0	0	0	0	0	0	0	0	0	0	+	+	+	0	+

Social impacts are predicted to be mixed. Protecting employment sites across the borough will ensure local employment opportunities. This can help reduce inequalities, and in turn help improve health and well-being. Under this alternative policy there would be no increase in housing delivery. SMEs can be an important part of an areas character. Protecting and retaining these

businesses can help foster a sense of place and pride. Protecting local employment sites ensures local employment opportunities are available, and can reduce the need to travel.

Environmental impacts are predicted to be neutral. This alternative policy is unlikely to result in development and therefore improvements in townscape, water quality and green infrastructure will not be secured.

Economic impacts are predicted to be overall positive. This will have positive impacts as employment sites will be protected, there will be no displacement of businesses or short term loss in employment during construction. However, in mixed-use development higher value uses such as housing can help subsidise investment in employment space. Therefore, in the longer term it may result in lack of investment and ultimately employment sites becoming unviable. This will have positive impacts by protecting locally accessible employment opportunities, which could reduce the need to travel.

It is considered that this policy will have a neutral impact on people who have the following protected characteristics: gender reassignment, marriage and civil partnership, age, religion and belief, pregnancy and maternity, race, sex and sexual orientation, disability.

Alternative Policy: To secure affordable workspace on site in all circumstances

I/A Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	+	+	+	+	+	+	-	+	0	?	+	0	0	0	+	+	0	?	?	+	0	+

Social impacts are predicted to be positive. Protecting employment sites across the borough will ensure local employment opportunities are protected. This can help reduce inequalities, and in turn help improve health and well-being. This will result in increased housing, including affordable housing. Encouraging investment through new development can help improve the quality of an area. Mixed-use development creates footfall and overlooking in areas throughout the day and evening. This can help improve feelings of safety and reduce crime. SMEs can be an important part of an areas character. Protecting and retaining these businesses can help foster a sense of place and pride. Where local employment sites are located in town centres intensification of use will help to increase the population of the centre and help to support its vitality and viability. Protecting local employment sites ensures local employment opportunities are available, and can reduce the need to travel. On the other hand, requiring affordable workspace in mixed use developments may result in lower levels of affordable housing being achieved as from a viability perspective reducing rents on workspace will result in income being available overall from the employment element of the scheme, which might need to be cross-subsidised through income generated from residential elements. It may also reduce the viability of replacing existing employment

space with higher specification space, as margins on development will be reduced. Increased intensification of use will increase the production of waste.

Environmental impacts are predicted to be mixed. The development will replace existing employment space with space designed to meet modern standards, including being air quality neutral. There is a risk in locating sensitive uses such as residential next to employment of impacts on amenity, particularly from noise. Given that space will be designed to modern sound insulation standards this can be mitigated. Impacts overall are therefore likely to be neutral. The loss of employment uses can have positive impacts in terms of reducing noise and other forms of pollution. Modern development will enhance the quality of the public realm, townscape and will integrate sustainable urban drainage systems which can help to improve water quality. Through redevelopment a net increase in biodiversity and green infrastructure is sought, but whether this constitutes a benefit will be dependent on the existing site and the level of planting and biodiversity already present. Impacts on biodiversity are therefore dependant on the nature of the site. Allowing more efficient use of land can help protect open space and greenfield sites from development pressure.

Economic impacts are uncertain. Workspace will be distributed across the borough, resulting in local employment opportunities. A risk is that creating affordable workspace in unviable locations results in vacant space which is ultimately converted to other uses. This will have positive impacts by protecting locally accessible employment opportunities, which could reduce the need to travel. Alternatively, the additional cost of providing affordable workspace may discourage investment in updated existing poor quality stock as margins will be reduced which might make this a less attractive prospect for a developer.

It is considered that this policy will have a neutral impact on people who have the following protected characteristics: gender reassignment, marriage and civil partnership, age, religion and belief, pregnancy and maternity, race, sex and sexual orientation, disability.

Conclusion

The IIA indicates the preferred policy option will result in the most positive social, economic and environmental impacts. A negative potential impact could be noise pollution due to the co-location of uses, and this will need to be managed through detailed design. The alternative option to secure affordable workspace on-site in all circumstances also score positively, but impacts are more uncertain as the policy may result in workspace in locations where there is no demand, or undermining investment in renewal of older industrial stock with better quality premises that meet modern-day requirements due to reductions in viability. If this space remains vacant positive impacts will not be realised.

Policy: BE4 SUPPORTING STRONG CENTRES																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	0	+	+	0/+	0	++	?/+	0	n/a	0	n/a	0	0	n/a	n/a	n/a	n/a	n/a	+	0	?	?	0
Impacts are positive in relation to social inclusion, housing, providing a high quality environment, maintaining and enhancing the borough's town centres and promoting sustainable economic growth. By clearly setting out which parts of town centres will be acceptable for residential development, the policy will provide an opportunity to increase housing supply in the borough. Limiting non A1 or A2 uses and the promotion of meanwhile uses in vacant space will improve residents' amenity and sense of place as well as making neighbourhoods better places to live. Access to sufficient and appropriate shops is a key aspect of social exclusion. The key effect of this policy will be its impact on the vitality and viability of town centres. By allowing for diversification of the high street, this policy will improve accessibility to key local services which can be located in town centres, and will also make access easier for those without access to a car due to the relatively high levels of public transport accessibility found in town centres. Supporting residential conversion in town centres will allow the development of high quality, well-connected housing to encourage sustainable travel by walking, cycling and public transport. The policy will promote regeneration and business development by encouraging meanwhile uses, which can enhance the impact of an area as a business location by diversifying the types of businesses on the high street. Impacts are neutral in relation to health inequalities, crime reduction, a sense of community, reducing waste, minimising air, noise and light pollution, enhancing the borough's landscape and townscape, protecting historic and cultural assets, reducing unemployment and encouraging efficient infrastructure to support economic growth. Although the policy has potential to reduce crime and anti-social behaviour by diversifying the uses in centres and preventing an overconcentration of uses associated with anti-social behaviour, this is a long-term possibility and dependent on other factors. Similarly, the policy may foster a sense of pride in an area by improving its vitality although this is not a significant impact. The policy will have uncertain impacts in relation to traffic reduction, facilitating indigenous and inward investment and maximising the potential for everybody to contribute economically through increasing and improving the provision of and access to childcare, education and training facilities, volunteering opportunities and informal employment. Where journeys to																								

other centres are offset by availability of non-retail uses locally, positive effects are likely. However, an increase in activity within these areas may generate a net increase in traffic overall. There are possible employment opportunities in new town centre uses, and inward investment may be encouraged by policy seeking to manage and facilitate new uses.

This policy is not applicable to objectives relating to water quality, natural habitats, climate change and greenhouse gases, soil quality, protecting open space and flood risk reduction.

It is considered that this policy will have neutral impacts on people who have the following protected characteristics: gender reassignment, marriage and civil partnership, age, religion and belief, race, sex and sexual orientation, disability, pregnancy and maternity.

Alternative Policy: No policy to support the role of town centres

I/A Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	+	-	-	+	+	0	0	n/a	0	n/a	0	0	n/a	n/a	n/a	n/a	n/a	-	0	-	?	0

Impacts are slightly positive in relation to providing everybody with the opportunity to live in a home which is suitable to their identified needs. By not protecting town centres for main town centre uses, it is likely that the policy would increase housing supply in the borough as premises were converted to residential use or demolished for new residential schemes to come forward.

Impacts are neutral in relation to traffic reduction, reducing waste, minimising air, noise and light pollution, protecting and enhancing the borough's landscape and townscape, protecting and enhancing the historic environment and cultural assets, reducing unemployment and encouraging efficient infrastructure to support economic growth.

Impacts are negative in relation to social inclusion, reducing health inequalities, providing a high quality environment, crime reduction, and facilitating indigenous and inward investment within the borough. Impacts are very negative in relation to encouraging a shared sense of community and cultural identity, maintaining and enhancing the role and vitality and viability of Brent's town centres and promoting sustainable economic growth. Access to sufficient and appropriate shops is a key aspect of social inclusion, particularly among Brent's older population. With no protection for retail uses in town centres social inclusion would be negatively impacted. Without a policy to set out what is appropriate town centre development it is likely that there would be a proliferation of employment types such as takeaways and betting shops which would negatively affect the vitality and viability of

Brent's town centres as well as limiting resident's access to sufficient and appropriate shops. Retail uses would diminish and negatively impact the sense of place in the borough's town centres.

Impacts are uncertain in relation to maximising the potential for everybody to contribute economically. While some employment opportunities may be lost through the conversion of business premises to residential, without a policy to restrict certain use classes it is possible that new businesses would open and provide employment opportunities.

This policy is not applicable to objectives relating to water quality, natural habitats, climate change and greenhouse gases, soil quality, protecting open space and flood risk reduction.

It is considered that this policy will have neutral impacts on people who have the following protected characteristics: gender reassignment, marriage and civil partnership, religion and belief, race, sex and sexual orientation, disability, pregnancy and maternity. This policy could have a negative impact on the protected characteristic of age, as it could be particularly detrimental to older populations, who are dependent on sufficient access to appropriate shops.

Alternative Policy: To permit all new non-A1 or A2 uses within town centres, with no restriction on A4 and A5 uses within Primary Shopping Frontages and no requirement for a Retail Impact Assessment

I/A Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	+	-	-	!	!	0	0	n/a	0	n/a	0	0	n/a	n/a	n/a	n/a	n/a	-	0	-	?	0

Impacts are slightly positive in relation to providing everybody with the opportunity to live in a home which is suitable to their identified needs. By not protecting town centres for main town centre uses, it is likely that the policy would increase housing supply in the borough as premises were converted to residential use or demolished for new residential schemes to come forward.

Impacts are neutral in relation to traffic reduction, reducing waste, minimising air, noise and light pollution, protecting and enhancing the borough's landscape and townscape, protecting and enhancing the historic environment and cultural assets, reducing unemployment and encouraging efficient infrastructure to support economic growth.

Impacts are negative in relation to social inclusion, reducing health inequalities, providing a high quality environment, crime reduction, and facilitating indigenous and inward investment within the borough. Impacts are very negative in relation to

encouraging a shared sense of community and cultural identity, maintaining and enhancing the role and vitality and viability of Brent's town centres and promoting sustainable economic growth. Access to sufficient and appropriate shops is a key aspect of social inclusion, particularly among Brent's older population. With no protection for retail uses in town centres social inclusion would be negatively impacted. Without a policy to set out what is appropriate town centre development it is likely that there would be a proliferation of employment types such as takeaways and betting shops which would negatively affect the vitality and viability of Brent's town centres as well as limiting resident's access to sufficient and appropriate shops. Retail uses would diminish and negatively impact the sense of place in the borough's town centres.

Impacts are uncertain in relation to maximising the potential for everybody to contribute economically. While some employment opportunities may be lost through the conversion of business premises to residential, without a policy to restrict certain use classes it is possible that new businesses would open and provide employment opportunities.

This policy is not applicable to objectives relating to water quality, natural habitats, climate change and greenhouse gases, soil quality, protecting open space and flood risk reduction.

It is considered that this policy will have a neutral impact on people who have the following protected characteristics: gender reassignment, marriage and civil partnership, religion and belief, race, sex and sexual orientation, disability, pregnancy and maternity. This policy could be particularly negative to older populations, who are dependent on sufficient access to appropriate shops.

Alternative Policy: To refuse all applications for non-A1 or A2 uses within town centres

I/A Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	!	-	-	!	!	0	0	n/a	0	n/a	0	0	n/a	n/a	n/a	n/a	n/a	!	0	-	?	0

Impacts are neutral in relation to traffic reduction, reducing waste, minimising air, noise and light pollution, protecting and enhancing the borough's landscape and townscape, protecting and enhancing the historic environment and cultural assets, reducing unemployment and encouraging efficient infrastructure to support economic growth.

Impacts are negative in relation to social inclusion, reducing health inequalities, providing a high quality environment, crime reduction, and facilitating indigenous and inward investment within the borough. Impacts are very negative in relation to providing everybody with the opportunity to live in a home which is suitable to their identified needs, encouraging a shared

sense of community and cultural identity, maintaining and enhancing the role and vitality and viability of Brent's town centres and promoting sustainable economic growth. Refusing all non-A1 and A2 uses would negatively impact housing supply in Brent as town centres are proposed to be key locations for future housing growth due to their relatively high levels of public transport accessibility and access to shops and services. Not allowing other commercial uses within centres may mean that the vitality and viability of the centre is undermined to its long term detriment. It is clear that retail patterns are changing and as such other uses will be appropriate in town centre frontages to support to the centre, subject to this not unacceptably displacing viable retailers.

Impacts are uncertain in relation to maximising the potential for everybody to contribute economically. While the retail role of the town centre would be protected, refusing all applications for residential use would limit the number of people passing through Brent's centres and therefore negatively impact economic growth, reducing the number of jobs available. It could also result in vacant premises where retailers are not available, thus meaning opportunities for alternative occupation by successful businesses is denied.

This policy is not applicable to objectives relating to water quality, natural habitats, climate change and greenhouse gases, soil quality, protecting open space and flood risk reduction.

It is considered that this policy will have neutral impacts on people who have the following protected characteristics: gender reassignment, marriage and civil partnership, religion and belief, race, sex and sexual orientation, disability, pregnancy and maternity. Depending on the strength of a centre it might result in empty premises that could otherwise be used for commercial occupiers, thus providing jobs, or in very poorly performing centres, the loss of additional residential accommodation.

Conclusion: The restriction of A4 and A5 uses within Primary Shopping Frontages in Brent's town centres is necessary to protect the retail core of the high street and maintain access to appropriate and sufficient shops and services. The assessment indicates the preferred policy option has a number of positive impacts which the reasonable alternatives do not. While national and regional policy may offer some guidance in this area, the preferred policy option adds Brent-specific detail to this issue, allowing the council to guide development in the way which best suits Brent's needs.

Policy: BE5 PROTECTING RETAIL IN TOWN CENTRES

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	n/a	+	0/+	+	++	+/-	0	n/a	0	n/a	0/+	n/a	n/a	n/a	n/a	n/a	n/a	+	?	+	0	0

Impacts are positive in relation to social inclusion, health inequalities, providing a high quality environment, a sense of community, maintaining and enhancing the borough's town centres, promoting sustainable economic growth and facilitating indigenous and inward investment. Access to sufficient and appropriate shops is a key aspect of social exclusion, while preventing an overconcentration of takeaways and shisha cafes in proximity to schools will encourage healthy lifestyle choices and support initiatives to address health inequalities. By managing and encouraging appropriate non-retail uses the vitality and maintenance of centres can be improved. Diversifying centres is likely to boost local economic activity and make the borough a more attractive place to live and work. While this policy may restrict the development new takeaways, betting shops and pawnbrokers which generate employment, preventing an overconcentration of these uses will also support more viable centres. By diversifying the uses in centres and preventing an overconcentration of uses associated with anti-social behaviour it is possible that positive effects on crime and anti-social behaviour will be seen in the long term where the amount of pedestrian traffic and variety of people using these spaces increases. The limitation of takeaways near schools will have some benefits in reducing the potential for some younger people to be overweight.

Impacts are neutral in relation to reducing waste, minimising air, noise and light pollution, maximising the potential for everybody to contribute economically through increasing and improving the provision of access to childcare, education and training facilities, volunteering opportunities and informal employment.

The policy will have an uncertain effect in terms of reducing the effect of traffic on the environment. Where journeys to other centres are offset or negated by availability of retail uses locally, positive effects are likely. However, an increase in activity within these areas may generate a net increase in traffic overall.

This policy is not applicable to objectives relating to housing, water quality, natural habitats, protecting historic and cultural assets, climate change and greenhouse gases, soil quality, protecting open space and flood risk reduction.

It is considered that this policy will have neutral impacts on people who have the following protected characteristics: gender reassignment, marriage and civil partnership, religion and belief, race, sex and sexual orientation. This policy will have a particularly positive impact on the protected characteristic of age, disability and pregnancy and maternity, as older residents or those with limited mobility often rely on the shops in town centres and may have difficulty travelling to out of centre locations. In addition, younger people are less likely to eat fast food when the offer of takeaways in close proximity to schools is either greatly reduced, or non-existent.

Alternative Policy: No policy to restrict non-retail uses

I/A Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	+	!	-	-	!	0	0	n/a	0	n/a	0	n/a	n/a	n/a	n/a	n/a	n/a	-	?	?	0	0

Impacts are slightly positive in relation to providing everybody with the opportunity to live in a home which is suitable to their identified needs. By not protecting town centres for main town centre uses, it is likely that the policy would increase housing supply in the borough as premises were converted to residential use or demolished for new residential schemes to come forward.

Impacts are neutral in relation to traffic reduction, waste reduction, minimising air, noise and light pollution, creating, enhancing and maintaining the borough's landscape and townscape, maximising the potential for everybody to contribute economically and encouraging efficient infrastructure to support growth.

Impacts are negative in relation to social inclusion, reducing health inequalities, providing a healthy, safe, high quality environment, enhancing community safety by reducing crime, encouraging a shared sense of community, maintaining and enhancing the role and vitality and viability of Brent's town centres and promoting sustainable economic growth. Access to sufficient and appropriate shops is a key aspect of social inclusion, particularly among Brent's older population. With no protection for retail uses in town centres social inclusion would be negatively impacted. Without a policy to set out what is appropriate town centre development it is likely that there would be a proliferation of employment types such as takeaways and betting shops which would negatively affect the vitality and viability of Brent's town centres as well as limiting resident's access to sufficient and appropriate shops. Retail uses would diminish and negatively impact the sense of place in the borough's town centres.

Impacts are uncertain in relation to offering everybody the opportunity for rewarding and satisfying employment and facilitating indigenous and inward investment.

This policy is not applicable to objectives relating to water quality, natural habitats, protecting and enhancing the historic environment and cultural assets, climate change and greenhouse gases, soil quality, protecting open space and flood risk reduction.

It is considered that this policy will have neutral impacts on people who have the following protected characteristics: gender reassignment, marriage and civil partnership, religion and belief, race, sex and sexual orientation. This policy will have negative impacts on the protected characteristics of age, disability and pregnancy and maternity, as older residents or those with limited mobility often rely on the shops in town centres and may have difficulty travelling to out of centre locations. In

addition, younger people will have greater opportunity to eat fast food as the offer of takeaways overall and in close proximity to schools is greatly increased.

Conclusion: It is important to ensure there is not an over-concentration of particular uses within any single length of frontage, an approach supported by national and regional policy as well as a growing evidence base. The preferred policy option would have several positive effects not seen in the reasonable alternative. In order to maintain a diverse and viable high street offer it is considered that the preferred policy option is the most suitable for Brent.

Policy: BE6 NEIGHBOURHOOD PARADES AND ISOLATED SHOP UNITS

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	0	n/a	+	?	+	++	?	n/a	n/a	0	n/a	0	n/a	n/a	n/a	n/a	n/a	n/a	+	0	0	0	n/a

Impacts are positive in relation to social inclusion, providing a high quality environment, a sense of community, maintaining and enhancing the borough's town centres and improving accessibility to a range of services and facilities and promoting sustainable economic growth and regeneration. Access to sufficient and appropriate shops is a key aspect of social exclusion. Local shopping parades and markets can act as an important social resource and provide opportunities for social interaction for people who may have limited contacts with others in their day-to-day lives. Local and neighbourhood shopping parades and centres can be an important focus of the local economy, and maintain local economic multiplier effects bringing significant local benefit.

Impacts are neutral in relation to health inequalities minimising air, noise and light pollution, enhancing the borough's landscape and townscape, reducing unemployment, facilitating indigenous and inward investment within the borough and maximising the potential for everybody to contribute economically.

Impacts are uncertain in relation to enhancing community safety and reducing the effect of traffic on the environment through reducing the need to travel. Active and maintained local shopping parades can act as a community focus, though also a gathering point for youths and the possibility of anti-social behaviour. This possibility is likely to be minimised where parades are busy and well maintained. Where this is the case, a busy parade which provides for a good range of needs can reduce the need to travel further afield.

The policy is not applicable to objectives relating to housing, reducing waste, water quality, natural habitats, protecting historic and cultural assets, climate change and greenhouse gases, soil quality, protecting open space, flood risk reduction and encouraging efficient infrastructure to support economic growth.

It is considered that this policy will have neutral impacts on people who have the following protected characteristics: gender reassignment, marriage and civil partnership, religion and belief, race, sex and sexual orientation. The policy will have positive effects on the protected characteristic of age, disability, and pregnancy and maternity, as older residents and those with limited mobility often rely on local shops in neighbourhood parades.

Alternative Policy: No policy regarding neighbourhood parades and isolated shop units

I/A Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	0	n/a	-	?	-	-	-	n/a	n/a	0	n/a	-	n/a	n/a	n/a	n/a	n/a	n/a	-	0	0	0	n/a

Not having a policy is considered to be predominantly negative in terms of social impacts. Not having a policy around Brent's neighbourhood parades and isolated shop units could result in the loss of individual shop units, which could also result in harmful gaps in neighbourhood parades. The loss of these resources could have negative impacts in terms of social exclusion, as these parades can act as an important social resource and provide opportunities for social interaction for people who may have limited contact with others in their day-to-day lives. Active and maintained local shopping parades can act as a community focus, though also a gathering point for youths and the possibility of anti-social behaviour. This possibility is likely to be minimised where parades are busy and well maintained. Where this is the case, a busy parade which provides for a good range of needs can reduce the need to travel further afield.

Not having a policy is considered to be slightly negative in terms of economic impacts. Local and neighbourhood shopping parades and centres can be an important focus of the local economy, and maintain local economic multiplier effects bringing significant local benefit. As not having a policy could result in the loss of these resources, this could have negative economic impacts.

Not having a policy is considered to be predominantly negative in terms of environmental impacts. Not having a policy could result in the loss of these important resources. This could result in increased car usage, as residents travel further to the resources

they need. There could also be a negative impact in terms of townscape, as the loss of units in parades can create gaps, and well-maintained and busy parades are less likely to be a gathering point for youths and the possibility of anti-social behaviour.

It is considered that not having a policy regarding neighbourhood parades and isolated shop units would have a neutral impact on the following protected characteristics: gender reassignment, marriage and civil partnership, religion and belief, race, sex and sexual orientation. However, the policy could have a negative impact on the protected characteristics of age, disability and pregnancy and maternity. This is because these groups often rely on local shops in neighbourhood parades, and not having a policy may result in the loss of such parades and shop units.

Conclusion: This policy proposes to largely take forward the existing policy in the Brent Local Plan that relates to Neighbourhood Parades and Isolated Shop Units DMP4. It is important to ensure that neighbourhood parades and isolated shop units are managed such that their loss is prevented (unless exceptions are met), thus contributing towards sustainable communities and ensure that convenient access to goods is available to those who need them. Not having a policy could result in the loss of important resources within communities. As such, no changes to the existing policy are proposed.

Policy: BE7 SHOPFRONT DESIGN AND FORECOURT TRADING

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	n/a	n/a	n/a	+	n/a	+	0	n/a	n/a	n/a	n/a	n/a	+/-	++	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a

Impacts are positive in relation to providing a high quality environment for borough residents to live, work and enjoy, encouraging a shared sense of community and protecting and enhancing historic and cultural assets. The retention of Brent's heritage assets will help to provide a high quality streetscape and sense of place. This can provide Brent's various communities with a shared sense of community and cultural identity.

Impacts are mixed in relation to creating and maintaining an attractive and clean environment, including protecting and enhancing the borough's townscape. Although the retention of Brent's historic shopfronts would contribute to an attractive townscape, there is a possibility that permitting forecourt trading could decrease the quality of the environment by allowing shops to spill out into public space with no controls on visual amenity.

This policy is not applicable to objectives relating to social inclusion, health inequalities, housing, reducing crime, reducing traffic, reducing waste production, water quality, minimising air, noise and light pollution, natural habitats, climate change and greenhouse gas emissions, soil quality, open spaces, flood risk reduction, economic growth and regeneration, employment, facilitating indigenous and inward investment, maximising the potential for everybody to contribute economically and encouraging efficient infrastructure to support economic growth.

It is considered that this policy will have neutral impacts on people who have the following protected characteristics: gender reassignment, marriage and civil partnership, religion and belief, race, sex and sexual orientation. The policy will have positive impacts on the protected characteristics of age, disability, pregnancy and maternity as by ensuring forecourts don't create street clutter will help ensure easily navigable routes for those in wheelchairs and with pushchairs. The associated shopfront design guide also contains information on seeking door widths that can accommodate these protected groups, plus advice on colour contrasts to help those with a visual impairment.

Alternative policy: No policy regarding shopfront design and forecourt trading

I/A Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	n/a	n/a	n/a	-	n/a	-	-	n/a	n/a	n/a	n/a	n/a	-	-	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a

In relation to social criteria, impacts of not having a policy are considered to be mainly negative. Not having a policy to manage shopfront design and forecourt trading could result in a lower quality streetscape and sense of place. This could detrimentally impact various communities' shared sense of community.

In relation to environmental criteria, impacts of not having a policy are considered to be mainly negative. Although there is a risk that permitting forecourt trading could decrease the quality of the environment by allowing shops to spill out into public space, the lack of a policy to support the retention of Brent's historic shopfronts would have negative impact on the appearance of Brent's townscapes.

The following are not considered to be applicable to this policy: economic growth and regeneration, employment, facilitating indigenous and inward investment, maximising the potential for everybody to contribute economically and encouraging efficient infrastructure to support economic growth.

It is considered that not having a policy will have neutral impacts on people who have the following protected characteristics: gender reassignment, marriage and civil partnership, religion and belief, race, sex and sexual orientation. Not having a policy is likely to have a negative impact on the following protected characteristics: age, disability, pregnancy and maternity, as the lack of a policy could result in increased street clutter and non-easily navigable routes for those in wheelchairs and with pushchairs.

Conclusion: This policy proposes to take forward the existing policy in the Brent Local Plan that relates to Shopfront Design and Forecourt Trading DMP4A. Shopfronts play a key role in establishing the character of Brent's town centres and neighbourhood parades. The existing policy ensures shop fronts and forecourts contribute to an attractive environment. Not having a policy could result in poor environments and detrimental impacts to the character and viability of Brent's town centres. As such, no changes to the existing policy are proposed.

Policy: BE8 MARKETS AND CAR BOOT SALES

I/A Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	n/a	n/a	+	?	++	++	0	+	n/a	n/a	n/a	0	0	n/a	n/a	n/a	n/a	n/a	+	+	+	n/a	n/a

Impacts are positive in relation to social inclusion, providing a safe, high quality and healthy environment, encouraging a shared sense of community, maintaining and enhancing the role and vitality and viability of Brent's town centres, waste reduction, sustainable economic growth, reducing unemployment and facilitating indigenous and inward investment. Local markets can act as an important social resource and provide opportunities for social interaction for people who may have limited contact with others in their day-to-day lives. Local markets can also reduce the need to travel further afield for fresh produce, positively impacting on traffic levels in the borough. Local markets and car boot sales can also help sustain the local economy, bringing shoppers into town centres and maintaining local multiplier effects, bringing significant local benefit.

Impacts are neutral in relation to traffic reduction, protecting the borough's landscape and townscape and protecting and enhancing the historic environment and cultural assets.

Impacts are uncertain in relation to crime reduction. Although the vast majority of traders are likely to be selling genuine second-hand goods, it is possible that car boot sales could provide an accessible local market for stolen goods such as consumer electrics/mobile phones.

The policy is not applicable to objectives relating to health inequalities, providing everybody with the opportunity to live in a home which is suitable to their identified needs, water quality, minimising air, noise and light pollution, natural habitats, mitigating against the impacts of climate change, soil quality, open space, flood risk reduction, maximising the potential for everybody to contribute economically and encouraging efficient infrastructure to support economic growth.

It is considered that this policy will have neutral impacts on people who have the following protected characteristics: gender reassignment, marriage and civil partnership, age, religion and belief, race, sex and sexual orientation, disability, pregnancy and maternity.

Alternative Policy: no policy to manage markets

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	n/a	n/a	-	?	-	-	-	0	n/a	n/a	n/a	0	0	n/a	n/a	n/a	n/a	n/a	-	-	-	n/a	n/a

Social Impacts are mainly considered to be negative. Local markets can act as important social resources, providing opportunities for social interaction for people who have limited contact with others in their day-to-day lives. Local markets can also reduce the need to travel further afield for fresh produce, and can bring shoppers into town centres, maintaining local multiplier effects and bringing significant local benefit. Not having a policy to manage markets may result in the loss of existing retail markets or result in the lack of improvement in existing markets, resulting in the loss of these important social resources, reducing opportunities for social interaction.

Environmental impacts are mixed. It is considered that the loss of local markets may have a negative impact on traffic generation, as the loss of local resources may result in an increased need to travel.

Economic impacts are considered to be negative. Not having a policy to manage the provision of markets may result in the loss of existing retail markets or result in new markets being created in unsuitable locations. This in turn may result in the loss of these important economic resources which can provide employment opportunities for local people and business start-ups.

It is considered that this policy will have neutral impacts on people who have the following protected characteristics: gender reassignment, marriage and civil partnership, age, religion and belief, race, sex and sexual orientation, disability, pregnancy and maternity.

Conclusion: Not having a policy would not be appropriate, as it would not be regarded as being in general conformity with the London Plan or the NPPF. The preferred policy proposes to take forward the existing policy in the Brent Local Plan that relates to Markets and Car Boot Sales DMP5. No changes to the policy are proposed. It is included for completeness.

Policy: BE9 VISITOR ACCOMMODATION AND ATTRACTIONS

I/A Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	0	n/a	+	0	n/a	n/a	++	+	n/a	n/a	n/a	n/a	0	n/a	n/a	n/a	n/a	n/a	n/a	+	+	+	n/a	n/a

Impacts are positive in relation to housing, maintaining and enhancing the role and vitality and viability of Brent's town centres, traffic reduction, promoting sustainable economic growth, reducing unemployment and facilitating indigenous and inward investment within the borough. Ensuring visitor accommodation is managed as short-term accommodation and not permanently occupied prevents the development of inappropriate residential development which does not provide suitable amenity standards, as well as protecting sites which are needed to meet housing need from being developed for visitor accommodation. Visitor accommodation and attractions make an important contribution to Brent's economy, generating local employment and attracting visitors to the area which benefits existing businesses. By guiding visitor accommodation and hotel development to Wembley and Kilburn where public transport accessibility levels are high, there should be lower levels of vehicular trips generated than if there was no restriction on where facilities could be located.

Impacts are neutral in relation to social inclusion, providing a safe, high-quality and healthy environment, and protecting the borough's landscape and townscape.

This policy is not applicable to objectives relating to health inequalities, crime reduction, encouraging a shared sense of community, waste reduction, water quality, minimising air, noise and light pollution, natural habitats, protecting the historic environment, mitigating the impacts of climate change, soil quality, open space, flood risk reduction, maximising the potential for everybody to contribute economically and encouraging efficient infrastructure to support economic growth.

It is considered that this policy will have neutral impacts on people who have the following protected characteristics: gender reassignment, marriage and civil partnership, age, religion and belief, race, sex and sexual orientation, pregnancy and maternity. It will have positive impacts on the protected characteristic disability as it will ensure visitor accommodation meets accessibility standards.

Alternative policy: No policy to manage hotels and other visitor accommodation																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	0	n/a	-	0	n/a	n/a	+	-	n/a	n/a	n/a	n/a	0	n/a	n/a	n/a	n/a	n/a	n/a	+	+	+	n/a	n/a
Impacts are positive in relation to maintaining and enhancing the role and vitality and viability of Brent’s town centres, promoting sustainable economic growth, reducing unemployment and facilitating indigenous and inward investment within the borough. Visitor accommodation and attractions make an important contribution to Brent’s economy, generating local employment and attracting visitors to the area which benefits existing businesses.																								
Impacts are neutral in relation to social inclusion, providing a safe, high-quality and healthy environment, and protecting the borough’s landscape and townscape.																								
Impacts are negative in relation to ensuring everyone has the opportunity to live in a home which is suitable to their needs and traffic reduction. Without adequate conditions attached to hotel development there is a risk that they could become permanently occupied which would not provide suitable amenity standards for residents. Without a policy to guide hotels and visitor accommodation to areas of the borough with high public transport accessibility levels there will be an increase in vehicular trips.																								
This policy is not applicable to objectives relating to health inequalities, crime reduction, encouraging a shared sense of community, waste reduction, water quality, minimising air, noise and light pollution, natural habitats, protecting the historic environment, mitigating the impacts of climate change, soil quality, open space, flood risk reduction, maximising the potential for everybody to contribute economically and encouraging efficient infrastructure to support economic growth.																								
It is considered that this policy will have neutral impacts people who have the following protected characteristics: gender reassignment, marriage and civil partnership, race, religion and belief, race, sex and sexual orientation, disability, pregnancy and maternity.																								
Conclusion: The GLA has forecast significant future demand for service accommodation over the Local Plan period and it is important to have a policy in place to ensure this development is located in the most appropriate parts of the borough. The preferred policy option also places conditions on hotels to prevent them from becoming permanent accommodation for residents, which would not																								

provide sufficient amenity space. It is considered that the preferred policy option offers benefits to the borough which the reasonable alternative does not, and so is the most suitable policy option for Brent.

Heritage and Culture

Policy: BHC1 BRENT'S HERITAGE ASSETS

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	0	0	0	+	0	+	0	0	+	0	0	0	0	++	+	0	0	0	0	0	0	0	0	0

The policy will have significant positive impacts in relation to historic environment and positive impacts in relation to quality of surroundings, diversity, waste and townscape. The policy will seek to ensure that Brent's heritage assets are identified, understood, protected and enhanced and where demolition is unavoidable that an understanding of the quality of the replacement is clear. This will have significant benefits in protecting the historic environment. The policy will ensure that a high quality environment in Brent is maintained or enhanced. Heritage assets are usually valued buildings, often of civic importance that can be closely aligned to different groups, such as places of worship or ethnic groups. As such their retention or enhancement is part of the evidence of a diverse society which can effectively meet the needs of all residents. The reuse of buildings is more likely to reduce waste through demolition. The increased protection of the historic environment is likely to have associated positive impacts on townscape.

The policy will have neutral impacts on social inclusion, health, homes that meet needs, accessibility, community safety, biodiversity, and open spaces, traffic, water, air pollution, soil, greenhouse gas emissions, climate change, flood risk, employment opportunities, education, diversity and skills and infrastructure. Although it may impact on some of these elements, where there are impacts these will either be negligible positives or negatives.

In relation to disability, pregnancy and maternity and age, there might be slight negative impact. With regards to race, sex, marriage and civil partnership, gender reassignment, religion and belief and sexual orientation the policy will have a neutral impact on these groups. The policy seeks to ensure protection and enhancement of heritage assets. Very infrequently this may result in buildings/ places not being able to be adapted to meet the needs of those with limited mobility due to the potential harm it would cause to the heritage asset. These circumstances are reducing as more innovative ways of dealing with matters are delivered.

Alternative policy: No policy, rely on the London Plan policy

I/A Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	0	0	0	?	0	?	0	0	?	0	0	0	0	?	?	0	0	0	0	0	0	0	0	0

Not having a policy regarding Brent's heritage assets would have uncertain social, economic and environmental impacts, as insufficient clarity would be given on how development impacting heritage assets will be assessed by the council. Additionally, not having a policy (or relying on the London Plan policy) would not be consistent with the statutory requirement to preserve or enhance nationally recognised heritage assets.

It is uncertain how the lack of a policy regarding heritage assets would impact on the following protected groups: disability, pregnancy and maternity, age, race, sex, marriage and civil partnership, gender reassignment, religion and belief and sexual orientation. Not having a policy means that insufficient clarity would be given on how development impacting heritage assets would be assessed by the council.

Policy: BHC2 NATIONAL STADIUM WEMBLEY

I/A Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	0	0	0	+	+	++	0	+	0	0	+	0	0	++	0	0	0	0	0	0	0	0	0	0

The policy will have significant positive impacts in relation to population diversity/ culture and to quality of surroundings and townscape. It will have minor positive effects on community safety, traffic and noise. The policy will seek to ensure that the architectural integrity of the stadium is maintained/ enhanced and that the views of the national stadium from key locations are protected. This will maintain the design by Sir Richard Rogers and allow for its potential as a listed building to be considered in the future. Maintaining views will continue the associated prominence as a local landmark. It will enhance the sense of place within Brent and orientation, whilst protecting and enhancing the setting of the stadium within the Borough. The protection of the stadium for football purposes will ensure that the country's national game will have a symbolic home of football and allow continued large attendance by many different types of fans to a variety of national and leading club games. The control on the number of capacity events allows for proper consideration of issues such as policing/ community safety and traffic management to be addressed to the benefit of attendees and the local community.

The policy will have neutral impacts on social inclusion, health, homes that meet needs, accessibility, bio-diversity and open spaces, water, soil, greenhouse gas emissions, climate change, flood risk, employment opportunities, education and skills and infrastructure. Although it may impact on some of these elements, where there are impacts these will either be negligible positives or negatives.

With regards to race, disability, age, pregnancy and maternity, sex, marriage and civil partnership, gender reassignment, religion and belief and sexual orientation the policy will have a neutral impact on these groups. The stadium's use can be representative of the whole population, or for specific groups can meet particular needs at particular times. The policy is to ensure that the stadium remains competitive as a venue, retains importance as a national cultural icon and landmark.

Alternative Policy: No policy.

I/A Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	0	0	0	-	-	-	0	0	0	0	0	0	-	-	0	0	0	0	0	0	0	0	0	0

The policy is not seen to have any positive impacts.

The policy will have negative impacts associated with quality of surroundings, crime, community identity, townscape, and heritage. By having no policy, the protected view of the stadium will be compromised, incurring inappropriate development which will obscure the stadium, reducing the resident's sense of place and pride for an area.

This policy is anticipated to have neutral impacts on social inclusion, well-being, housing, accessibility, traffic, waste, resources, environmental health, biodiversity, climate change mitigation and adaption, land and soil, open spaces, flood risk, regeneration, employment, investment, education, and efficient infrastructure.

On race, disability, age, pregnancy and maternity, sex, marriage and civil partnership, gender reassignment, religion and belief and sexual orientation a lack of policy will have a neutral impact on those with a protected characteristic.

Alternative Policy: Reduction or increase in number of identified views

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	0	0	-	-	-	-	0	0	0	0	0	0	-	-	0	0	0	0	0	-	0	-	0	0
This policy is expected to negatively impact quality of surroundings, crime, community identity, townscape, heritage, regeneration, and investment. The current views have been identified to provide views from all appropriate vantage points, often from transport networks in which people visiting the stadium will be arriving by. These views have been well preserved and have presented themselves as sufficient to uphold the stadium's symbolic status as the national football stadium. Identifying other views will be unlikely to present any new, overlooked opportunities due to recent development. If identified the new views would prevent potential development from occurring, reducing housing provision in these corridors. If the scope was decreased, some neighbourhoods would lose valuable views, reducing their sense of place, quality of surroundings, community identity and townscape. The resulting reduction in significance of the stadium will serve to decrease local investment within the area, impacting upon potential regeneration. This policy will have negative impacts on social inclusion, well-being, accessibility, traffic, waste, resources, environmental health, biodiversity, climate change mitigation and adaption, land and soil, open spaces, flood risk, employment, education, and efficient infrastructure. With regards to disability, age, pregnancy and maternity, sex, marriage and civil partnership, gender reassignment, religion and belief and sexual orientation, not having a policy will have a neutral impact on these groups.																								
Alternative Policy: Greater restriction, or less control on activities or development of the stadium																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	0	0	0	-	-	-	0	0	0	0	0	0	-	-	0	0	0	0	0	0	0	0	0	0
The policy will have negative impacts associated with quality of surroundings, crime, community identity, townscape, and heritage. A change in the restrictions held upon the stadium will likely result in changes in the amount of people visiting the stadium which could rise with less control and reduce with increased control. This will impact upon the viability of the stadium, impacting upon its performance as a national venue, reducing the quality of the surroundings, which combined with an increase in people visiting, may increase crime rates. The change in control of development around the stadium may alter its perception in the public eye, reducing its prominence if over developed or increasing if enhanced as a heritage asset.																								

This policy will have negative impacts on social inclusion, well-being, accessibility, traffic, waste, resources, environmental health, biodiversity, climate change mitigation and adaption, land and soil, open spaces, flood risk, regeneration, employment, investment, education, and efficient infrastructure.

With regards to disability, age, race, pregnancy and maternity, sex, marriage and civil partnership, gender reassignment, religion and belief and sexual orientation the policy will have a neutral impact on these groups.

Conclusion: The proposed policy is seen to be most appropriate for Brent, bringing with it a number of potentially positive benefits. The proposed policy seeks to protect and enhance the stadium as a national and local asset without impacting too heavily upon local development. The stadium provides surrounding communities with a sense of identity and pride at a local and national level which is important in increasing social cohesion.

Preferred Policy: BHC3: SUPPORTING BRENT'S CULTURE AND CREATIVE INDUSTRIES

IIA Objective Scoring	EC5	0
	EC4	0
	EC3	+
	EC2	+
	EC1	0
	EN12	0
	EN11	0
	EN10	0
	EN9	0
	EN8	0
	EN7	+
	EN6	+
	EN5	0
EN4	0	
EN3	0	
EN2	0	
EN1	0	
S7	+	
S6	+	
S5	0	
S4	+	
S3	0	
S2	0	
S1	+	

The policy will have minor positive impacts in relation to social inclusion, quality of surroundings, population diversity/ culture, town centres and to quality of surroundings and townscape, cultural assets, growth and regeneration and investment. This policy is designed to enhance local culture and encourage the creation of a creative industries hub at Willesden Green and any potential future zones. As the London borough of culture 2020 it will be of particular importance for the council to embrace this policy, encouraging the expression of, and involvement in, cultural and creative activities wherever possible. Involvement in these practices will help the council meet a range of borough objectives, including to increase social inclusion/cohesion, reduce crime rates, and increase accessibility to a range of services, including the creative. Through initiatives it will also be possible to improve the general environment and quality of surroundings in the borough through the introduction of art which itself will help create a sense of place and pride for an area. Embracing culture, whilst achieving all of these things, should act to increase vitality within the borough which will increase the prospect of investment and associated regeneration. This policy will be of particular benefit to minority groups, providing an outlet for them to express themselves, strengthening their identity and position within the local community.

The policy will have neutral impacts on traffic, health, homes that meet needs, community safety, accessibility, traffic, waste, bio-diversity and open spaces, water, soil, greenhouse gas emissions, climate change, flood risk, education and skills and

infrastructure. Although it may impact on some of these elements, where there are impacts these will either be negligible positives or negatives.

The policy supports creative industry, and this is likely to have a beneficial impact on the following groups: race (as a specific cultural identity will be able to be expressed), religion and belief (as a cultural identify, more often than not tied into race, will be able to be expressed) and sexual orientation (as the arts have historically and still provide in the majority of situations an environment for freedom of expression and greater acceptance of minorities). For the other protected characteristics, there might be small benefits but these are not considered to be any greater than for the population as a whole. **With regards to disability, age, pregnancy and maternity, sex, marriage and civil partnership, gender reassignment the policy will have a neutral impact on these groups.**

Alternative Policy: No policy

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	0	0	-	0	-	-	0	0	0	0	0	-	-	0	0	0	0	0	0	-	-	0	0

The policy will have negative impacts in relation to social inclusion, quality of surroundings, community identity, townscapes, cultural assets, regeneration, and investment. In order for the creative enterprise zone to flourish it needs council backing and encouragement. Without a specific policy this area would not see the required development to see this happen, impacting negatively upon social cohesion, reducing the sharing of values between residents, disproportionately impacting those from minority ethnic groups by impeding their ability to express themselves creatively and partake in local activities directly, in a visible way. This policy would not help enhance the quality of the surroundings and cultural assets through regeneration and investment, leading to a poor townscape and sense of place.

This policy will have neutral impacts on well-being, housing, crime, traffic, waste, resources, environmental health, biodiversity, climate change mitigation and adaption, land and soil, open spaces, flood risk, regeneration, education, and efficient infrastructure.

Not having a policy may negatively impact the following groups: race (as a specific cultural identity will be able to be expressed), religion and belief (as a cultural identify, more often than not tied into race, will be able to be expressed) and sexual orientation (as the arts have historically and still provide in the majority of situations an environment for freedom of expression and greater acceptance of minorities). For the other elements of protected characteristics, there will be no difference compared to the preferred policy, and therefore the policy would have a neutral impact.

Alternative Policy: To provide a more detailed policy that sets out specific criteria against which applications will be assessed																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	0	0	-	0	-	-	0	0	0	0	0	-	-	0	0	0	0	0	0	-	-	0	0
This will only incur negative impacts in the form of social inclusion, quality of surroundings, community identity, townscapes, cultural assets, regeneration, and investment. It would not be possible to effectively standardise the planning process for cultural assets as they represent a very dynamic asset which covers a wide range of areas. In doing so this policy may reduce the creative potential which may reveal itself, reducing social cohesion, quality of surroundings, community identity, towns capes, regeneration and associated investment. This policy will have neutral impacts on well-being, housing, crime, traffic, waste, resources, environmental health, biodiversity, climate change mitigation and adaption, land and soil, open spaces, flood risk, regeneration, education, and efficient infrastructure. The policy is considered to have a beneficial impact on the following groups: race (as a specific cultural identity will be able to be expressed), religion and belief (as a cultural identify, more often than not tied into race, will be able to be expressed) and sexual orientation (as the arts have historically and still provide in the majority of situations an environment for freedom of expression and greater acceptance of minorities). For the other of protected characteristics, there might be small benefits but these are not considered to be any greater than for the population as a whole. With regards to disability, age, pregnancy and maternity, sex, marriage and civil partnership, gender reassignment the policy will have a neutral impact on these groups. Overall, it is considered that there would be little difference between the preferred policy and this policy in terms of impact.																								
Conclusion: The proposed policy is seen to have the greatest potential for positive impacts. It is important for there to be a policy specific to the implementation of the creative hub at Willesden in order to prove the seriousness of the council’s intent and to provide guidance and coordination for developers to collaborate on this endeavour. In this case it would not be appropriate for there to be no policy. If the policy were to become more detailed it would reduce the flexibility of the project, as being of a creative nature, the policy needs to be dynamic in order to react to the creative flow.																								

Policy: BHC4 BRENT'S NIGHT TIME ECONOMY																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	0	0	+	0	+	+	0	0	0	0	0	0	+	0	0	0	0	0	0	+	+	0	0
The policy will have minor positive impacts in relation to social inclusion, quality of surroundings, population diversity/ culture, town centres and to quality of surroundings, cultural assets, growth and regeneration and investment and employment. The policy seeks to encourage the maintenance and enhancement of the borough's recognised night-time economy venues. As the economy is often associated with creative/ cultural outputs it will increase opportunities for social inclusion by highlighting and making different cultural events available and accessible to more, bettering communications between those from different social groups. The initiative will create a sense of place by differentiating these areas from other parts of the borough/ London, some of which will support or create new cultural assets. The night time economy is an important contributor to the overall economy providing a variety of employment opportunities for artists who may not be accommodated in mainstream employment and others associated with hospitality/ venues. The night time economy is an important part of facilitating inward investment in the borough.																								
The policy will have neutral impacts on traffic, health, homes that meet needs, community safety, accessibility, traffic, waste, bio-diversity and open spaces, water, soil, townscape, greenhouse gas emissions, climate change, flood risk, education and skills and infrastructure. The night time economy does have some mixed outcomes around some elements such as crime, waste, noise and community cohesion. Although historically the implications of some of these elements may have been negative, usually related to the consumption of alcohol, it is considered that with appropriate design/ conditions on developments, plus inter-agency working that the negative elements can be mitigated to such an extent that they are considered neutral in their impacts.																								
On age, race and sexual orientation the policy is considered to have positive impacts. On disability, pregnancy and maternity, sex, marriage and civil partnership, gender reassignment and religion and belief the policy will have a neutral impact on those with a protected characteristic. The policy supports the night time economy. This is of greater importance for some groups, i.e. the young, ethnic groups and sexual orientation in environments that provide a safe place to meet with similar people/ ability for cultural expression. For some faith and ethnic groups, the night time economy, particularly if predicated on alcohol consumption can be intimidating/ threatening in the physical sense or beliefs. However, this policy does not support one particular type of night time economy activity over another and therefore the impact on these groups is neutral.																								

Alternative Policy: No policy																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	0	0	-	-	-	-	0	0	0	0	0	0	-	0	0	0	0	0	0	-	-	0	0
The policy will have negative impacts in relation to social inclusion, quality of surroundings, crime, population diversity/ culture, town centres and to quality of surroundings, cultural assets, growth and regeneration, investment, and employment. It is important for the council to encourage the enhancement of the night time economy as it is often something which is overlooked by developers, with many night time venues such as pubs and clubs closing down or being converted into other uses such as residential. The night time economy is a large source of employment within the borough, delivering a specific need often to those whom cannot work during the day or cannot work full time hours, helping to improve equality for those with specific protected characteristics. The night time economy is often associated with cultural activities and therefore helps with social inclusion and creating a sense of place within the borough. Although often associated with crime, the night time economy helps get people out on the streets later at night, helping create a source of passive surveillance which would otherwise be absent. It is also important in creating a sense of place and vibrancy, helping to improve town centre viability and associated investment and regeneration.																								
This policy will have neutral impacts on well-being, housing, traffic, waste, resources, environmental health, biodiversity, landscape and townscape, climate change mitigation and adaption, land and soil, open spaces, flood risk, regeneration, education, and efficient infrastructure.																								
On age, race and sexual orientation, a lack of is considered to have negative impacts. On disability, pregnancy and maternity, sex, marriage and civil partnership, gender reassignment and religion and belief a lack of policy will have a neutral impact. Not having a policy could undermine some elements of the night time economy. This might be to the detriment of some groups, i.e. the young, ethnic groups and sexual orientation and possibly gender reassignment meeting in environments that provide a safe place to meet with similar people/ ability for cultural expression. For some faith and ethnic groups, the night time economy, particularly if predicated on alcohol consumption can be intimidating/ threatening in the physical sense or beliefs. The loss of premises may be neutral in this respect.																								

Alternative Policy: To identify a wider range of centres to prioritise for the night time economy																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	-	-	-	-	-	-	0	0	-	0	-	0	0	0	0	0	0	-	-	-	0	-
The anticipated negative impacts are associated with social inclusion, health and well-being, housing, quality of surroundings, crime, accessibility, community identity, traffic, environmental health, townscape, regeneration, employment, investment, and efficient infrastructure. The negative impacts listed here are primarily a result of the increased fragmentation of previously concerted efforts, undermining the critical mass of infrastructure which has been sort from the areas addressed by the London plan. This will act to separate neighbourhoods, reducing their likely integration, reducing individual centres capacity to meet the diverse needs or its residents, increasing dependency on personal vehicles and decreasing physical activity and increasing air pollution. The policy may lead to a reduction in overall investment, impinging upon regeneration, affecting the aesthetics of the townscape, its sense of place and ability to attract local businesses, reducing town centre viability and employment opportunities. The scattered infrastructure will also serve to reduce the efficiency of freight distribution. A dispersed nature may also undermine effective policing/ enforcement of law and order where police resources are more limited, increasing the propensity for disorder or harm from physical assault. This policy will have neutral impacts on waste, resources, biodiversity, heritage, climate change mitigation and adaption, land and soil, open spaces, flood risk, and education. On age, race and sexual orientation the policy is considered to have positive impacts. On disability, pregnancy and maternity, sex, marriage and civil partnership, gender reassignment and religion and belief the policy will have a neutral impact on those with a protected characteristic. The policy supports the night time economy in a wider range of locations. This is of greater importance for some groups, i.e. the young, ethnic groups and sexual orientation in environments that provide a safe place to meet with similar people/ ability for cultural expression. For some faith and ethnic groups, the night time economy, particularly if predicated on alcohol consumption can be intimidating/ threatening in the physical sense or beliefs. Criminal incidents related to property damage, anti-social behaviour and physical violence are more likely to occur in town centres where alcohol is prevalent. A significant element of protecting safety is having sufficient police/ security presence to oversee the night time economy. Significant increases in premises, particularly over a wider range of areas unless matched by significant additional police/ security resource could lead to a reduction in safety of those groups with protected characteristics which have been identified as having both positive and negative impacts.																								

Conclusion: The proposed policy is seen as the most appropriate for Brent, potentially having numerous positive impacts. It is important for the council to support the development of the night time economy and in doing so will help Brent achieve a number of key objectives. Therefore, it would not be seen as appropriate to have no policy. In order for Brent to maximise the associated benefits of the night time economy it is important to concentrate efforts into designated night time economy centres in order to increase long term viability, therefore it would not be appropriate to identify additional areas for this purpose.

Policy: BHC5 PUBLIC HOUSES

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	0	0	+	0	+	+	0	0	0	0	0	0	+	0	0	0	0	0	0	+	0	0	0

The policy will have minor positive impacts in relation to social inclusion, quality of surroundings, population diversity/ culture, town centres and to quality of surroundings, cultural assets, growth and regeneration and investment and employment. The policy seeks to encourage the maintenance and enhancement of the borough's public houses recognising the cultural benefits that they have as places that historically have been at the heart of communities and allow for dialogue/ interaction and also cultural events. Pubs create a sense of place by differentiating these areas from other parts of the borough/ London. The night time economy is an important contributor to the overall economy providing a variety of employment opportunities for artists who may not be accommodated in mainstream employment and others associated with hospitality/ venues.

The policy will have neutral impacts on traffic, health, homes that meet needs, community safety, accessibility, traffic, waste, bio-diversity and open spaces, water, soil, townscape, greenhouse gas emissions, climate change, flood risk, education and skills and infrastructure. Public houses do have some mixed outcomes around some elements such as crime, waste, noise and community cohesion. Although historically the implications of some of these elements may have been negative, usually related to the consumption of alcohol, it is considered that with appropriate design/ conditions on developments, plus inter-agency working that the negative elements can be mitigated to such an extent that they are considered neutral in their impacts.

On age, race and sexual orientation the policy is considered to have positive impacts. On disability, pregnancy and maternity, sex, marriage and civil partnership, gender reassignment and religion and belief the policy will have a neutral impact on those with a protected characteristic. The policy supports the retention of public houses. This is of greater importance for some groups, i.e. the young or old, ethnic groups (but predominantly white British) and sexual orientation in environments that provide a safe place to meet with similar people/ ability for cultural expression. For some faith and ethnic groups, public houses are not

part of their lifestyle and can be regarded as intimidating/ threatening in the physical sense or to their beliefs. However, the policy will not result in the creation of any new public houses, and the policy is therefore considered to have a neutral impact on these groups.																								
Alternative Policy: No policy																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	0	-	-	-	-	-	0	0	0	0	-	-	0	0	0	0	0	-	-	-	0	-
This policy will negatively impact social cohesion, well-being, and quality of surroundings, crime, community identity, accessibility, traffic, townscape, heritage, regeneration, employment, investment, and efficient infrastructure. This policy is likely to lead to the reduction in pubs, and their replacement with alternative investments, which the council has not advised is appropriate. This removal of social infrastructure will negatively affect social cohesion and resident satisfaction due to a reduced sense of place and community identity along with a decrease in accessibility to key services. Pubs represent valued cultural and historic assets and their removal will decrease the attractiveness of an area, the policy will lead to a reduction on local investment, reducing long term employment opportunities and increasing the need to commute.																								
This policy will have neutral impacts on housing, waste, resources, environmental health, biodiversity, climate change mitigation and adaption, land and soil, open spaces, flood risk, and education.																								
On age, race and sexual orientation, not having a policy is considered to have negative impacts. On disability, pregnancy and maternity, sex, marriage and civil partnership, gender reassignment and religion and belief the policy will have a neutral impact on those with a protected characteristic. A lack of policy is likely to exacerbate the trend in loss of public houses. This would more adversely impact on some groups, i.e. the young or old, ethnic groups (but predominantly white British) and sexual orientation in environments that provide a safe place to meet with similar people/ ability for cultural expression. For some faith and ethnic groups, public houses are not part of their lifestyle and can be regarded as intimidating/ threatening in the physical sense or to their beliefs, so the loss of public houses is likely not to be as negative.																								
Alternative Policy: To provide more criteria for assessment																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	0	-	-	-	-	0	0	0	0	0	-	-	0	0	0	0	0	-	-	-	0	-

This policy will negatively impact social cohesion, well-being, quality of surroundings, crime, community identity, accessibility, traffic, townscape, heritage, regeneration, employment, investment, and efficient infrastructure. Public houses are important and valued community assets. It is therefore important that they remain viable investments for those interested, and continue to entice investment in the years to come. The current set of assessment criteria outlined in this policy have been in place for two years and have proved successful in maintaining the industries viability. If the criteria were too strict it would provide additional risk to investors who may fear they cannot back out once they're invested. It is therefore important to maintain a level of flexibility within the system to enable this, having them converted into alternate uses provide they sufficiently meet assessment requirements. Therefore, the addition of extra criteria may reduce public house viability leading to its reduced presence in town centres, negating the intention of the policy and serving to decrease a number of council objectives such as social inclusion, well-being, community safety and identity. The policy will also serve to reduce employment opportunities within the area.

This policy will have neutral impacts upon housing, Traffic, waste, resources, environmental health, biodiversity, climate change mitigation and adaption, land and soil, open spaces, flood risk, and education.

This is not considered to have fundamentally different impacts to the preferred policy, as it is unlikely to significantly change the potential for pubs to be retained. On age, race and sexual orientation the policy is considered to have positive impacts. On disability, pregnancy and maternity, sex, marriage and civil partnership, gender reassignment, and religion and belief the policy will have a neutral impact on those with a protected characteristic. The policy supports the retention of public houses. This is of greater importance for some groups, i.e. the young or old, ethnic groups (but predominantly white British) and sexual orientation in environments that provide a safe place to meet with similar people/ ability for cultural expression. For some faith and ethnic groups, public houses are not part of their lifestyle and can be regarded as intimidating/ threatening in the physical sense or to their beliefs. However, the policy will not result in the creation of any new public houses will therefore have a neutral impact on these groups.

Conclusion: The proposed policy is seen as the most appropriate for Brent, bringing with it numerous positive impacts. The proposed policy has been demonstrated to be successful at both mitigating against loss of public houses, but also the continued investment in them, retaining them as a viable investment both socially and economically.

Green Infrastructure

Preferred Policy: BGI1 GREEN AND BLUE INFRASTRUCTURE IN BRENT																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	+/-	+	?	+	?	+	?	++	+	++	+	+	+	+	+	++	+	+	?	?	n/a	+/-
The policy will have positive impacts in relation to: promoting social inclusion; health and well-being; providing a high quality and healthy environment; encouraging a shared sense of community and cultural identity; promoting sustainable modes of travel; minimising air, noise and light pollution; conserve and enhance the borough’s natural habitats and biodiversity; protecting and enhancing the borough’s historic and cultural assets; climate change; land and soil; green and open space; flood risk; and economic growth. The creation of additional green and blue infrastructure within Brent will have a number of positive impacts on the borough’s residents and environments. These benefits include: improving mental and physical well-being, such as reducing stress and depression, for all residents; reducing health inequalities within the borough; providing spaces for exercise and active recreation; provide places for all communities to congregate and socialise; improve living conditions within the borough; enhancing the accessibility to the borough’s green infrastructure; providing residents and visitors the opportunity to interact with nature; filtering noise and improving air quality; and, reducing flood risk within the borough through absorbing water and capturing run-off. The protection and enhancement of the borough’s existing green infrastructure will also be beneficial for the biodiversity and land and soil through the safeguarding of established habitats and areas of geological significance from development pressures. The creation of green spaces can be used as a tool to help the borough’s urban landscape and population adapt and mitigate against the impacts of climate change. For example, additional green space can to tackle the impacts of urban heat island effect through lowering temperatures by utilising the cooling benefits that green spaces can bring. Furthermore, green spaces can assist in capturing CO₂ and other pollutants. Green infrastructure can help to promote economic growth through creating a healthy environment for workers, creating jobs and support attracting investment. It is considered that this policy will have a positive impact on the following protected characteristic: ‘age’. This policy will have a positive impact on the elderly population of the borough through reducing their vulnerability on the impacts of urban heat island and air pollution, and assisting in reducing social isolation through providing areas where social interaction can take place. Furthermore, providing areas for children to play can support a child’s social, emotional, intellectual and physical development. Evidence is also emerging which highlights the impacts that exposure to air pollution can have on pregnant women and their unborn child. Improving air quality within the borough can reduce such risks.																								
Impacts will be unknown in relation to re-use and recycling, improving community safety and preventing crime, accessibility, employment, facilitating indigenous and inward investment, education and skills and efficient infrastructure. The impact the																								

borough's green infrastructure has on waste and recycling rates is dependent on the management plan and infrastructure/facilities that are in place, for example whether opportunities for composting is provided or a rain garden included. Improving connectivity to the boroughs green infrastructure, through implementing a green grid network, may indirectly result in improvements in connectivity to the borough's employment areas. Incorporating green infrastructure within town centres can support its vitality and viability through creating a pleasant shopping environment, and encouraging an increase in 'dwell time'. It is possible that green infrastructure within town centres can support its vitality and viability through the creation of an aesthetically pleasing environment, and providing space for visitors/residents. However, this policy does not specifically address the greening of town centres, instead focusing on improving green infrastructure at a borough-wide scale. It is possible that greening the town centres could occur through development coming forward within the town centre boundary. Green Infrastructure can support the provision of jobs, however the amount of jobs provided is dependent on the amount and type of green infrastructure that is in place within the borough.

The policy will have mixed benefits in relation to housing and creating efficient infrastructure. The continued protection, and the requirement for on-site open space provision will reduce the area of land available for development, or have an impact on the density that can be achieved on a site. However, the provision of on-site open space and improved access to open space will contribute to creating a higher quality living environment, which has improved liveability. The protection of the borough's green infrastructure, in particular that of Brent's waterways, will provide the opportunity to use these assets to distribute freight. However, increased usage of the borough's waterways for freight movement can result in an increase in water pollution, if appropriate mitigation measures are not put in place.

The policy will have no effect on improving educations and skills.

It is considered that this policy will have a neutral impact on people who have the following protected characteristics: disability, gender reassignment, marriage and civil partnership, race, religion and belief, sex and sexual orientation. The policy will have positive impact on the protected characteristics of age and pregnancy and maternity as poor air quality can be particularly detrimental to the health of these groups.

The policy seeks protect and enhance the borough's natural environment, and where appropriate, seek improvements to its accessibility, which will benefit all residents within the borough.

ALTERNATIVE POLICY: Rely on London Plan policy

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	?	+/-	n/a	+	?	+	n/a	+	+	+	+/-	+	+	+	+	+	+	+	n/a	n/a	n/a	+/-

This policy will have positive impacts on prosperity, inequalities and social inclusion; health and well-being; community identity; traffic; water quality and resources; environmental health; historic environments and cultural assets; biodiversity; landscape and townscape; climate change mitigation; climate change adaption; land and soil; open space; flood risk; and growth and regeneration. London Plan policy will have a number of positive impacts on the borough's residents, visitors and environments. These include health and well-being benefits, such as reduced stress and improved physical activity levels; providing areas for communities to congregate and socialise; encourage active travel through providing pleasant and safe walking environments; protecting spaces within the borough which offer a social and cultural function; improving water quality in line with the Thames River Basin Management Plan and Catchment Plans; contribute to improving air quality and reducing the impacts of noise and light pollution; providing habitats for the borough's biodiversity.

This policy will have mixed effects on housing; quality of surroundings; townscape and landscape; and efficient infrastructure. London Plan policy requires development plans to protect open space, and where possible, create new publicly accessible open space provision on development sites. This approach will reduce the area of developable land available within the borough, and can also have an impact on the density that can be achieved on development sites. However, the continued protection of open space and on-site provision can contribute to creating a higher quality living environment and improves the liveability of an area. As mentioned previously, the London Plan seeks to protect open spaces. The retention of open spaces within the borough will have an impact on the quality of surroundings, however it is the quality of the open spaces which will determine whether it is has a positive or negative impact. Enhancements and quality of open spaces is not specifically addressed within London Policy, with the exception of Metropolitan Open Land, Metropolitan Parks and Regional Parks. As the current quality of open spaces within the borough vary, therefore only protecting open spaces, as per London Policy, will have a mixed effect on quality of surroundings. A similar case can also be applied to townscape and landscape.

The policy will have no effect on crime prevention and community safety; waste and recycling; historic environments and cultural assets; employment; education and skills.

This policy will have a neutral impact on people with the following protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation.

London Plan policy seeks to protect designated green spaces from inappropriate development, and seeks improvement to accessing nature. These policies will benefit all residents within the borough.																								
ALTERNATIVE POLICY: Developing on poorer quality spaces to fund improvements to other green spaces																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+/-	+/-	+	+/-	n/a	+/-	?	+/-	n/a	?	+/-	+/-	++	+/-	+/-	+/-	+/-	+/-	+/-	+	+	+	n/a	n/a
This policy will have positive impact on housing; landscape and townscape; growth and regeneration; and investment. The development of poorer quality open spaces to fund improvements to the borough’s other green spaces will have limited positive impacts. This policy approach will enable development on poor quality open spaces, which could include housing, to fund improvements to other open spaces within the borough. The loss of poorer quality landscape, and enhancements to other green spaces will contribute to creating an attractive environment, which in turn can lead to promote/trigger the regeneration of an area and attract investment within the borough. The development on poorer quality open spaces will create construction jobs on a short-term basis within the borough; however, it should be noted that the amount of construction jobs created is dependent on Employment, Apprenticeship and Training Plans being secured.																								
This policy will have mixed benefits on prosperity, inequalities and social inclusion; health and wellbeing; quality of surroundings; environmental health; historic environments and cultural assets; biodiversity; climate change mitigation; climate change adaptation; land and soil; open space; flood risk. Improvements to the quality of open space within the borough will bring a number of social benefits, such as providing a good quality environment for residents to congregate and socialise, health and well-being benefits, and areas for physical activity and recreation. However, these benefits will not be felt for residents who are located close to open spaces which will be developed on to support enhancements elsewhere. While enhancements to green spaces can contribute to the uptake of active travel within the borough, the loss of open space can have an impact on accessibility. The enhancement of open and green space can improve a spaces ability to contribute to negating the impacts air quality, noise and light pollution; however, the loss of open space within an area could lead to the impacts of air quality, noise and light pollution worsening. Enhancements to green space within the borough will be beneficial for wildlife, in particular if actions from the wildlife sites review is incorporated; however, the loss of open space will also mean the loss of a habitat. Open spaces help the borough to mitigate and adapt to the impacts of climate change, for example reducing flood risk within the urban areas and contributing to lowering the temperate; however, it is possible areas in which open space will see an increase in vulnerability to the impacts of climate change. In regards to open space, while the enhancement of open space will have a number of positive impacts, some of which have been previously																								

discussed, this will be mixed with the negative impacts associated with the loss of open space. Open spaces can be seen as cultural assets due to their ability to fulfil a range of social and cultural needs.

The policy will have unknown effects on accessibility and employment. As mentioned previously, green infrastructure within, or in close proximity, to a town centre can help to maintain and improve its vitality and viability through creating a pleasant shopping environment and encouraging 'dwell time'. However, the impact that this policy will have is dependent on the decision made (improvement or loss) for green and open spaces within or close to town centre boundaries.

The policy will have no effect on crime prevention and community safety; employment; education and skills; and efficient infrastructure.

This policy will have a neutral impact on people with the following protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation. London Plan policy seeks to protect designated green spaces from inappropriate development, and seeks improvement to accessing nature. These policies will benefit all residents within the borough.

ALTERNATIVE POLICY: Providing no additional open space within the Council's Growth Areas and on major development sites

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	?	?	+	-	n/a	0	n/a	-	n/a	?	0	-	?	0	-	-	n/a	-	-	?	n/a	+/-	n/a	n/a

This policy will have positive impacts on housing. Through not requiring additional open space within the borough's Growth Areas more space will be available to accommodate additional housing and/or employment space.

This policy will have minor negative impacts on quality of surroundings; biodiversity; climate change adaption; climate change mitigation; open space; flood risk. Significant growth is anticipated to take place within the borough's Growth Areas. There are also a number of major developments that are anticipated to come forward outside of the boundaries of the borough's Growth Areas. It is likely that this growth will place additional pressure on the borough's resources, including existing green infrastructure. Not providing additional green and open space can result in a number of negative impacts for the borough's residents and environments, such as: restricting access to the health and well-being benefits of open space; limiting opportunities to create healthy environments for the borough's residents to live in, work in and enjoy; preventing improvements to accessibility to the borough's open space, particularly within the

densely developed south which has existing areas of open space deficiency ; not promoting the uptake of active modes of travel by minimising opportunities to create attractive walking and cycling environments; and providing no additional habitats within the borough, which not only limits accessibility to nature for residents, but can impact on the movement of wildlife from other areas of the borough. Increased pressure on existing open spaces as a result of the growth in population could lead to a decrease in quality. Not providing green spaces within the borough's Growth Areas and on major developments could increase their vulnerability to the impacts of climate change, in particular flooding and the urban heat island effect. Green and open spaces can act as sustainable drainage systems through capturing run-off. The capturing of surface water run-off, which can contain contaminants such as oil and organic matter, can help towards improving water quality within the borough. This benefit will not be realised within Growth Areas and major developments, some of which adjoin the borough's blue ribbon network. It is considered that this policy may have negative impacts on the following the following protected characteristics: 'age' and 'pregnancy or maternity'. It should be noted that such impacts are likely to be limited to the population within the identified Growth Areas. Through not providing additional green space within the identified Growth Area, the vulnerability of the elderly and young population to the impacts of climate change and poor air quality could be slightly increased.

This policy will have no effect on community identity; environmental health; historic environment and cultural assets and growth and regeneration. It is widely known that green and open space can contribute to improving air quality and filtering noise within an area. However, the London Plan policy requires all major developments to be designed to minimise the impact of noise and be at least air quality neutral; therefore, it is possible that through the implementation of London Plan policies environmental health benefits will still be realised within Growth Areas and on major developments.

This policy will have uncertain effects health and well-being; landscape and townscape; water quality and resources; and growth and regeneration. Green and open space can help to create an attractive townscape and landscape; however it is the design of the building, and its interaction with the existing environment, which will be the predominant factor in determining whether the development will have a positive or negative impact on the landscape/townscape

This policy will have positive and negative impacts on investment. The borough's Growth Areas have a number of characteristics, such as good links to the strategic road network and high PTAL levels, that make them a suitable to accommodate significant growth. Such characteristics can also contribute towards them being attractive to investment; therefore, not requiring additional open space to be provided within the Growth Areas can enable more high quality employment space, or housing to accommodate employees, to be provided. Both of these can contribute towards attracting investment to the borough. However, creating high quality open spaces within these areas can help to attract and retain industries through creating an environment where people want to live and work.

This policy is not applicable to crime prevention and community safety; accessibility; waste management; land and soil; employment; education and skills; and efficient infrastructure.

It is considered that this policy will have a neutral impact on people with the following protected characteristics: disability, gender reassignment, marriage and civil partnership, race, religion and belief, sex and sexual orientation. All residents within the Growth Area will not be able to take advantage of the benefits that green and open spaces can bring. However, the policy could have particularly negative impacts on the protected characteristics of age and pregnancy or maternity, as through not providing additional green space within the identified Growth Area, the vulnerability of the elderly, young and pregnant population to the impacts of climate change and poor air quality could be slightly increased. In addition, these groups may find it more difficult to visit existing open spaces due to their more limited mobility.

Conclusion: The preferred policy approach, which seeks to establish a Green Infrastructure Network within the borough, will result in a higher level of positive social, environmental and economic impacts. The IIA indicates that this approach will result in mixed benefits for two indicators.

Developing on poorer quality open spaces to fund improvements to other green spaces is not considered to be appropriate as it will result in loss of some of the borough's green space, which will be needed to support the growing population. Furthermore, the Council can explore opportunities for improving these open spaces, ensuring the social, environmental and economic benefits are maximised. Not requiring the Growth Areas and major development sites to provide additional publically accessible open space will place further pressure on the borough's existing green infrastructure, and will result in a number of negative impacts on environmental matters, such as biodiversity, climate change adaptation and environmental health.

Preferred Policy: BGI2 TREES AND WOODLANDS

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
		+	+/-	+	n/a	?	n/a	?	n/a	+	+	+	+	n/a	+	+	+	+	+	?	n/a	n/a	n/a	n/a

The policy will have a positive impact on prosperity, inequalities and social inclusion; health and well-being; quality of surroundings; environmental health; biodiversity; landscape and townscape; climate change mitigation and adaption; land and soil; open space and flood risk. The protection and retention of trees and woodlands, as well as increasing the tree coverage will have

a number of positive impacts on the borough's residents and environment, which include: providing areas for communities to meet; supporting the development of groups with a conservation interest; contribute to improving the quality of the local environment, which in turn could lead to some improvement within an areas level of deprivation; contribute to improved health and well-being of residents through, but not limited to reducing stress, encouraging physical activity and improving air quality; contribute to creating a healthy environment within the borough; helping to improve environmental quality within the borough through providing mitigation against noise and light pollution and helping to improve local air quality; supporting biodiversity through the provision of habitats; enhancing the quality of the public realm and townscape; supporting climate change mitigation and adaption through reducing flood risk; contributing to the character of the borough; green and open spaces. As mentioned previously, it is widely document that the young and elderly have increased vulnerability to the impacts of climate change and poor air quality. Evidence is also emerging which highlights the impacts that exposure to air pollution can have on pregnant women and their unborn child. Improving air quality within the borough can reduce such risks. Therefore, the mitigation and/or protection that trees can offer against climate change and air quality can lead to a reduction in vulnerability for residents with these protected characteristics.

The policy will have an uncertain impact on community identity; traffic and growth and regeneration. Trees and woodlands can encourage community development and the creation of a community identity. However, trees in which help shape a community is dependent on a number of factors, which includes quality, sentimental value and amenity value. In regards to traffic, tree planting can contribute to creating an attractive walking and cycling environment which could facilitate an increase in the uptake of active travel. However, as it is not possible to confirm that improvements to the walking environment through the planting of trees will increase the uptake of active ravel, the effects of this policy on this objective is uncertain. In regards to growth and regeneration, the inclusion of green infrastructure within town centres and employment areas can have a number of benefits, which include contribute to improving employee's productivity, and attracting businesses and visitors. However, the impact that the planting of trees will have is dependent on the scheme that comes forward, and whether trees are included within the scheme.

The policy will have mixed impacts on housing. The protection of woodland and trees within the borough could have a negative impact on housing development within the borough, in particular the development capacity of the site. However, protecting, and where possible increasing tree cover could help a new development to be viewed as attractive.

The policy will have no effect on crime prevention and community safety; accessibility; traffic; waste management; water quality and resources; employment; investment; education and skills; efficient infrastructure.

It is expected that maintaining and enhancing the borough's tree stock will have a neutral impact on the following protected characteristics: disability, gender reassignment, marriage and civil partnership, race, religion and belief, sex and sexual

orientation. However, the policy will have positive impact on the protected characteristic of age and pregnancy and maternity
The benefits associated with trees and hedgerows will be available for all residents, therefore will not have any adverse impact on people with protected characteristics.

ALTERNATIVE POLICY APPROACH – No protection for the borough's trees and woodlands

I/A Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	+	-	n/a	-	n/a	-	n/a	?	-	-	-	0	-	-	0	0	-	n/a	n/a	n/a	n/a	n/a

This policy approach will have a positive impact on housing. Not protecting the borough's woodlands and trees will mean that they can be removed to maximise the density at a development site.

This policy approach will have a negative impact on prosperity, inequalities and social inclusion; health and well-being; quality of surroundings; environmental health; biodiversity; landscape and townscape; climate change mitigation; climate change adaption; and flood risk. Without protecting the borough's trees, particularly those on development sites, there is a higher probability that they will be removed and not replaced. Trees and woodlands can encourage community cohesion, for example through the creation of groups who have an environmental or biodiversity interest. Therefore, not protecting trees, which could lead to their removal as part of a development scheme, may reduce the opportunities for these groups to form. Trees and woodlands provide a number of health and well-being benefits, such as improving air quality and mental well-being, which can be lost if removed to accommodate development. Trees provide a number of environmental benefits, such as acting as a sound barrier, improving air quality and reducing temperatures, all of which will be reduced/disappear if trees are removed. Trees provide a visual break within the built environment, provide residential amenity and help to establish a sense of place, all of which will be lost if the borough's trees are removed, due to them not being protected. Furthermore, trees can play an important role in assisting the borough in adapting and mitigating the impacts of climate change, for example, reducing flood risk through water retention and mitigating the impacts of urban heat island effect through reducing temperatures. If trees from a development site are removed, and not replaced, the sites resilience to the impacts of climate change could be affected.

This policy approach will have an unknown impact on water quality and resources. Trees can help to reduce flood risk within an area. The removal of trees, due to not being protected, could increase a vulnerability to flood risk and sewer overflow events. However,

the impact that flooding will have on an area is a combination of a number of factors, for example the capacity of the sewer infrastructure and presence of SuDS.

This policy approach cannot be applied to crime prevention and community safety; accessibility; waste management; growth and regeneration; employment; investment; education and skills; efficient infrastructure.

It is considered that this policy will have a neutral impact on people with the following protected characteristics: disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation, age. All residents within areas developed will not be able to take advantage of the benefits that retention of trees and woodland can bring.

Conclusion: The preferred policy approach results in a higher level of positive social, environmental and economic impacts. Protecting the borough's trees and woodlands will contribute to reducing poor air quality, help the borough to mitigate and adapt to the impacts of climate change and contribute towards maintaining and enhancing the borough's biodiversity. The IIA indicates that this approach results in a higher amount of positive impacts in comparison to not protecting the borough's trees and woodlands.

Sustainable Infrastructure

Preferred Policy: BSUI1 Creating a Resilient and Efficient Brent																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	n/a	+	n/a	n/a	?	n/a	n/a	+	+	n/a	n/a	n/a	++	++	n/a	n/a	+	+	n/a	n/a	n/a	+
This policy will have positive impacts on prosperity, inequalities and social inclusion; health and wellbeing; quality of surroundings; water quality and resources; environmental health; climate change mitigation; climate change adaption; and growth and regeneration, efficient infrastructure. The policy, which seeks to reduce carbon emissions and help to improve Brent's resilience against the impacts of a changing climate, can have a number of positive impacts on the borough's environment, which include: increasing the energy efficiency of buildings which would help to reduce fuel cost and the risk of fuel poverty, reduced greenhouse gas emissions through the usage of more efficient systems, and ensuring that buildings are able to mitigate and adapt to climate change over their intended lifetime, reducing long term costs. Improving the efficiency of the commercial buildings can also encourage growth and regeneration.																								
This policy will have uncertain effects on accessibility and the historic environment and cultural assets. This policy is not applicable to housing; crime prevention and community safety; community identity; historic environments and cultural assets; traffic; waste management; biodiversity; landscape and townscape; land and soil; open space; employment; investment; and, education and skills.																								
It is considered that this policy will have a neutral impact on people with the following protected characteristics: disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation. All residents in new developments within the specified areas will benefit from the provision of combined heat and power systems. Additionally, all residents within new developments will benefit from improved sustainable design. However, it is not clear that this will disproportionately impact any one protected characteristic over another. The policy could have a particularly positive impact on the protected characteristic of age, as the very old and very young can be more vulnerable to hotter temperatures. As such, ensuring that buildings are resilient to the impacts of climate change may particularly benefit these sub-groups.																								
ALTERNATIVE POLICY: Rely on draft London Plan policies (SI2, SI3, SI4)																								

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	n/a	+	n/a	n/a	?	n/a	n/a	+	+	+	n/a	?	++	++	n/a	+	+	+	n/a	n/a	n/a	+
This policy will have positive impacts on prosperity, inequalities and social inclusion; health and wellbeing; quality of surroundings; water quality and resources; environmental health; climate change mitigation; climate change adaption; open space; flood risk. The London Plan policies, which seeks to minimise greenhouse gas emissions, manage heat risk, improve energy and water efficiency, and encourage the use of sustainable energy infrastructure, will have a number of benefits on the borough's residents and environments, which include: reducing the cost of fuel and the risk of fuel poverty; improved health and wellbeing for residents linked to the presence of green infrastructure and improved air quality; improving the liveability of an area; creating an attractive townscape and landscape through incorporating green infrastructure into development schemes; providing habitats and green spaces; and improving local air quality. The requirement for developments to minimise greenhouse gas emissions and manage heat risk will help the borough's urban environment to mitigate and adapt to the changing climate. Improving the energy efficiency of commercial buildings within the borough can encourage growth and regeneration. This policy will have uncertain impacts on the historic environment and cultural assets and open space. Retrofitting the borough's older buildings, some of which have been afforded protection due to their special character, to ensure efficiency standards set out in the London Plan could have an impact on the historical value of these buildings. However, this is dependent on the scheme that comes forward, as it is possible to incorporate measures which will achieve the required measures sensitively. This policy is not applicable to housing; crime prevention and community safety; community identity; accessibility; traffic; waste management; land and soil; employment; investment; education and skills. It is considered that this policy will have a neutral impact on people with the following protected characteristics: disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation. The policy could have a particularly positive impact on the protected characteristic of age, as the very old and very young can be more vulnerable to hotter temperatures. As such, ensuring that buildings are resilient to the impacts of climate change may particularly benefit these sub-groups. Conclusion: The preferred policy option adopts a more local approach to tackling sustainability issues with Brent. The standards set in the policy build upon those set out within the draft London Plan.																								

Preferred Policy BSUI2 – Improving Air Quality																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	n/a	+	n/a	n/a	?	+	n/a	+	+	+	+	n/a	+	+	n/a	?	?	+	n/a	n/a	n/a	n/a
This policy will have positive impacts on prosperity, inequalities and social inclusion; health and wellbeing; quality of surroundings; water quality and resources; environmental health; biodiversity; landscape and townscape; climate change adaption; climate change mitigation. Improving local air quality will have a number of positive impacts on the borough’s residents and environment, which include: improved liveability in the borough’s urban environments; improvements to the health of the borough’s population, in particular the young, elderly and those with respiratory, which can result in less pressure on the borough’s health services; reducing health inequalities within the borough; support the creation of a healthy living environment for the borough’s residents and workers; reduce the impacts that poor air quality has on the borough’s ecosystem, such as the ability to grow and function; and, reduce the impacts that poor air quality has on the quality of the borough’s water resources. Improving local air quality will assist in alleviating the impact of climate change, such as the urban heat island. It is considered that this policy will have positive impacts on the following protected characteristics: ‘age’ and ‘pregnancy and maternity’. It is widely documented that the elderly and young have higher vulnerability to the impacts of poor air quality, due to adverse effects that it can have on their health. Therefore, improvements to the air quality within the borough is likely to see positive impacts on these age categories. Evidence is emerging which highlights the impacts that exposure to air pollution can have on pregnant women and their unborn child. Improving air quality within the borough can reduce such risks. Furthermore, poor air quality is not evenly distributed across the borough, with some areas more likely to be affected by poor air quality than others due to wider problems of poverty. Therefore, improvements to the air quality within the borough can result in improvements in the health and well-being, and living conditions of residents within these areas. This policy will have unknown effects on accessibility; open space and flood risk. Creating high quality public realm can assist in supporting the vitality of a town centre through creating a pleasant shopping environment. However, whether this approach has a positive impact on town centres is dependent on whether development comes forward within, or in close proximity to a town centre. There are a number of schemes which can come forward to tackle air quality. The Council’s Air Quality Strategy encourages the use of green infrastructure in addressing air quality issues, which in turn will see positive benefits against open space provision and flood risk mitigation. However, whether these benefits materialise will be dependent on the scheme that comes forwards, and the way they seek to achieve air quality positive/neutral status.																								

This policy is not applicable to housing; crime prevention and community safety; community identity; waste management; land and soil; employment; investment; education and skills; and, efficient infrastructure.

This policy will have a neutral impact on the following ‘protected characteristics’: disability, gender reassignment, marriage and civil partnership, race, religion and belief, sex and sexual orientation. However, this policy could have positive impacts on the groups ‘age’ and ‘pregnancy and maternity’, as the elderly and young have higher vulnerability to the impacts of poor air quality, and there is emerging evidence that suggests the impacts that exposure to air pollution can have on pregnant women and their unborn child.

Alternative Policy – Rely on London Plan Policy (S1)

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	n/a	+	n/a	n/a	n/a	?	n/a	+	+	+	+	n/a	+	+	n/a	+	+	+	n/a	n/a	n/a	n/a

This policy will have positive impacts on prosperity, addressing inequalities and social inclusion; health and well-being; quality of surroundings; water quality and resources; environmental health; biodiversity; climate change adaption; and climate change mitigation. London Plan policy supports improvements which will improve London’s air quality and reduce exposure to poor air, requires all developments to make provision for improved air quality and major developments to be at least air quality neutral. This policy will have a number of positive impacts on the borough’s residents and environment. These benefits include: improving the health of the borough’s population, particularly those who are considered to be vulnerable; improving liveability; reducing health inequalities; support the creation of a healthy environment for the borough’s residents; reducing the impact that poor air quality has on the borough’s environment, such as limiting their ability to grow and function; and, reducing the impact that poor air quality has on the borough’s waterbodies. Although it is not stipulated within this policy, there is a requirement for major developments to include an element of urban greening. Urban greening will not only contribute to improving local air quality, but could lead to an increase in green space within the borough and help to support and protect the borough’s biodiversity, improve flood resilience and contribute to creating an attractive landscape and townscape. It is considered that this policy will have positive impacts on the following protected characteristic: ‘age’. It is widely documented that the elderly and young have higher vulnerability to the impacts of poor air quality, due to adverse effects that it can have on their health. Therefore, improvements to the air quality within the borough is likely to see positive impacts on these age categories. Evidence is emerging which highlights the impacts that exposure to air pollution can have on pregnant women and their unborn child. Improving air quality within the borough can reduce such risks.

Furthermore, poor air quality is not evenly distributed across the borough, or within London, with some areas more likely to be affected by poor air quality than others due to wider problems of poverty. Therefore, improvements to the air quality within the borough, as a

result of implementing the above policy, could lead to improvements in the health and well-being, and living conditions of residents within impoverished areas.

This policy will have uncertain impacts on traffic. A number of measures can be implemented on site which could contribute to a development achieving air quality neutral or air quality positive status. In regards to traffic, measures which can be implemented to improve air quality include the promotion of active travel and improvements to public transport. Whether these measures are implemented is dependent on whether they could forward within a scheme, as they are not required as part of Policy S1.

This policy is not applicable to housing; crime prevention and community safety; community identity; waste management; historic environments and cultural assets; land and soils; employment; investment; education and skills; and, efficient infrastructure.

This policy will have a neutral impact on the following ‘protected characteristics’: disability, gender reassignment, marriage and civil partnership, race, religion and belief, sex and sexual orientation. However, this policy could have positive impacts on the groups ‘age’ and ‘pregnancy and maternity’, as the elderly and young have higher vulnerability to the impacts of poor air quality, and there is emerging evidence that suggests the impacts that exposure to air pollution can have on pregnant women and their unborn child.

Preferred Approach: BSUI3 Managing Flood Risk

I/A Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	0	0	?	n/a	n/a	n/a	n/a	?	n/a	+	0	0	0	n/a	+	+	n/a	0	++	+	n/a	n/a	n/a	n/a

This policy will have positive impacts on improving water quality; climate change mitigation; climate change adaption; flood risk; and growth and regeneration. Reducing flood risk within the borough will have a number of positive impacts for the borough’s residents and environments, which include: ensuring the borough’s residents are safe against the impacts of flooding; promoting water efficiency; and contribute to the borough’s mitigation and adaption against the impacts of climate change. Furthermore, the impacts of flooding can cause huge economic costs. Therefore, creating an environment with reduced flood risk is likely in the long-term to encourage people to want to remain in Brent, and provide and attractive and safe environment for people to live, work and establish businesses.

This policy will have mixed benefits on housing. This policy will ensure that buildings and homes are adaptable to flood risk in the long term. However, due to incorporating flood mitigation and adaption measures into a development scheme, it is possible that the density of the site will not be maximised, which in turn can impact on the deliverability of housing.

The policy will not have any significant effects on prosperity, addressing inequalities and social inclusion; health and wellbeing; accessibility; reducing the effects of traffic; environmental health; biodiversity; landscape and townscape; open space

This policy is not applicable to housing; crime prevention and community safety; community identity; waste management; historic environments and cultural assets; land and soils; employment; investment; education and skills; and, efficient infrastructure.

This policy will have a neutral impact on the following ‘protected characteristics’: disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation, age. The policy seeks to ensure that the risk of flooding to people and properties is minimised by applying the sequential approach.

Alternative Approach – Rely on London Plan Policy

I/A Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	0	+	?	+	n/a	n/a	n/a	n/a	n/a	+	+	+	+	n/a	+	+	n/a	+	+	+	n/a	n/a	n/a	n/a

Relying on London Plan Policy SI12 will have positive impacts on health and well-being; quality of surroundings; water quality and resources; environmental health; biodiversity; climate change mitigation; climate change adaption; open space; flood risk; and growth and regeneration. London Plan policy seeks to address current and expected flood risk for all development within London in a sustainable and cost effective way. Positive impacts associated within this policy approach include: protecting residents and their homes from the impacts of flooding; offer some protection to the borough’s water quality; the requirement for natural flood management method in development proposals can lead to additional green space within the borough, which in turn can assist in improving local air quality, improve the attractiveness of the borough’s landscape, enable residents to access the number of health benefits associated with open space and protect and enhance the borough’s biodiversity. Furthermore, this policy and its requirement for natural flood management methods, will, contribute to the borough’s mitigation and adaption to the impacts of climate change through minimising the impact of flooding, increasing flood storage and combating the impacts of the urban heat island effect. Protecting

the borough from flood risk can contribute to the borough's growth and regeneration through minimising the potential for flood damage, and their associated interruption to economic activity.

This policy will have unknown effects on housing. This policy will ensure that buildings and homes are safe from the impacts of flooding. However, for some sites the incorporation of on-site water attenuation schemes could impact on the density achieved. However, it is possible that through the layout and design of scheme this impact can be mitigated.

It is predicted that this policy will have no significant effect on prosperity, addressing inequalities and social inclusion.

This policy is not applicable to crime prevention and community safety; community identity; accessibility; traffic; waste management; historic environment and cultural assets; land and soil; employment; investment; education and skills; and efficient infrastructure.

This policy will have neutral impacts on the following 'protected characteristics': disability, gender reassignment, marriage and civil partnership, race, religion and belief, sex and sexual orientation, age and pregnancy and maternity.

Conclusion: The preferred policy approach adopts a more local approach to tackling flood risk within the borough, and has been informed by the findings of the Joint West London SFRA (2018). The draft London Plan adopts a strategic approach to addressing flood risk within London.

Preferred Approach: BSUI4 On site water management and surface water attenuation																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	0	?	?	?	n/a	n/a	n/a	n/a	n/a	+	?	?	0	n/a	+	+	?	?	++	+	n/a	n/a	n/a	n/a
This policy will have positive impacts on improving water quality and resources; climate change mitigation; climate change adaption; flood risk; growth and regeneration. Requiring developments to incorporation on site water management and surface water attenuation measures will have a number of positive impacts for the borough’s residents and environments, which include: ensuring the borough’s residents are safe against the impacts of flooding; promoting water efficiency; and contributing to the borough’s mitigation and adaption against the impact of climate change. Furthermore, this policy will offer some protection to the water quality of the borough’s water bodies through reducing the amount of pollutants that are washed into them as a result of surface-water runoff; reduce surface water run-off rates which in turn can reduced combined sewer overflow events; and, reduce the risk of flooding for the																								

borough's residents. Flooding can result in high economic costs; therefore, protecting the borough from its impacts will have a positive impact on the borough's economy.

This policy will have unknown effects on health and well-being; housing; quality of surroundings; biodiversity; environmental health; and open space. The impact that this policy will have on health and well-being, biodiversity, open space and environmental health is dependent on the SuDS scheme that comes forward – a natural SuDS scheme which incorporates green space, will enable residents to access the health benefits, associated with open space, contribute to improving air quality, provide additional habitats and open space, and act as a filter to noise. Such benefits will not materialise from mechanical SuDS schemes. **It should be noted that within the supporting text for this policy the Council has stated that it has a preference for more natural SuDS.** This policy will ensure that buildings and homes are safe from the impacts of flooding. However, for some sites the incorporation of on-site water attenuation schemes could impact on the density achieved. However, it is possible that through the layout and design of scheme this impact can be mitigated.

It is predicted that this policy will have no significant effects on prosperity, addressing inequalities and social inclusion; landscape and town scape

This policy is not applicable to crime prevention and community safety; traffic; community identity; accessibility; waste management; historic environment and cultural assets; employment; education and skills; and efficient infrastructure.

This policy will have neutral impacts on the following 'protected characteristics': disability, gender reassignment, marriage and civil partnership, race, religion and belief, sex and sexual orientation, age, pregnancy or maternity.

Alternative Policy Approach : Rely on London Plan Policy

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	0	+	?	+	n/a	n/a	n/a	n/a	n/a	+	+	+	0	n/a	+	+	+	+	++	+	n/a	n/a	n/a	n/a

The London Plan Policy seeks to ensure that developments adhere to the drainage strategy detailed in the Plan, achieve green-field run-off rates and ensure that water run-off is appropriately managed. **This policy approach will have positive impacts on: health and wellbeing; quality of surroundings; water quality and resources; biodiversity; climate change mitigation and climate change adaption; land and soil; open space; flood risk and growth and regeneration.** This policy approach will have a number of positive impacts for the borough's residents and environments which include: ensuring the borough's residents are safe against the

impacts of flooding; promoting water efficiency; and contributing to the borough's mitigation and adaption against the impact of climate change. Furthermore, this policy will offer some protection to the water quality of the borough's water bodies through reducing the amount of pollutants that are washed into them as a result of surface-water runoff; reduce surface water run-off rates which in turn can reduced combined sewer overflow events; and, reduce the risk of flooding for the borough's residents. Flooding can result in high economic costs; therefore, protecting the borough from its impacts will have a positive impact on the borough's economy. As identified in Policy SI13, there is a preference for green SuDS over grey SuDS. This preference could lead to an increase in green space provision within the borough, which in turn can lead to a number of health and well-being benefits (i.e. reduced stress, active lifestyles), benefits to the environmental health of the borough (i.e. helping to improve air quality, and reducing the impact of noise pollution) and supporting the borough's biodiversity.

It is predicted that this policy will have unknown effects on housing. This policy will ensure that buildings and homes are safe from the impacts of flooding. However, for some sites the incorporation of on-site water attenuation schemes could impact on the density achieved. However, it is possible that through the layout and design of scheme this impact can be mitigated.

It is predicted that this policy will neutral impacts on social inclusion and reducing inequalities and landscape and townscape.

This policy approach is not applicable to crime prevention and community safety; community identity; accessibility; traffic; historic environment and cultural assets; employment; investment; education and skills; and efficient infrastructure.

This policy will have neutral impacts on the following 'protected characteristics': disability, gender reassignment, marriage and civil partnership, race, religion and belief, sex and sexual orientation, age, pregnancy or maternity.

Conclusion: The preferred policy approach, in comparison to relying on London Plan policy, enables a more local approach to on-site water management to be adopted. Furthermore, it takes into considerations the findings of the West London SFRA, which was completed in 2018. Although a preference for natural SuDS is included within the supporting text for the preferred policy, it may be beneficial to include a steer within the policy itself.

Transport

Policy BT1 : Sustainable Travel Choice

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	++	+	+	+	+	0	?	++	0	+	?	+	+	0	+	+	0	0	+	+	+	+	0	++

Social impacts are predominantly positive. Streets designed to healthy streets standards promote social interaction, which can benefit community cohesion. Designing to meet these principles and providing access to all will also benefit those with limited mobility. They also incorporate resting places, which can be of particular benefit to people with reduced mobility including pregnant women, disability groups and the elderly. Ensuring streets are designed to the Mayor's Public London Charter will ensure certain groups don't feel excluded from spaces. This has been highlighted as an issue for young people in the borough. The West London Orbital will increase public transport access levels in parts of the borough which experience high levels of deprivation, including Neasden, Harlesden and Church End. As public transport is more affordable than private vehicle ownership, this will improve access to services and employment for these communities and could help reduce social exclusion.

Promoting the use of active travel such as walking and cycling over private vehicle has recognised health benefits. Children aged five–18 are recommended to do at least 60 minutes of moderate intensity activity (brisk walking or cycling) each day, while adults are recommended to do 150 minutes each week in periods of ten minutes or more. Active travel will help ensure everyone is achieving the level of exercise needed to stay physically healthy, which in turn has mental health benefits. Reducing harmful air pollution from private vehicles will also have positive health impacts. Air pollution caused by carcinogenic diesel emissions, high levels of nitrogen dioxide (NO2) and particulate matter (PM) exacerbate health conditions and shorten the lives of Londoners. The communities suffering the most from poor air quality are often the most vulnerable in society.

The West London Orbital will increase public transport accessibility levels, which will improve the deliverability of sites for housing. This will enable higher density housing to be delivered, increasing the level of housing and affordable housing delivered.

The creation of high quality walking and cycling routes, meeting standards such as healthy streets, will enhance the public realm. This can encourage increased use of public spaces, which will reduce crime and increase feelings of safety.

The West London Orbital will improve access to services for those living in the surrounding area. It will improve connections to Harlesden, Church End and Cricklewood Town Centre. It will also improve connectivity to Old Oak and Brent Cross where new and

extended town centres are planned. This could encourage people to shop outside of the borough and negatively impact on Brent's town centres. The impacts are uncertain and will be dependent on how town centres adapt their offer to take advantage of increased connectivity. Designing to healthy streets standards and enhancing the A5 corridor and North Circular could assist with this by improving the quality of environment in town centres, particularly Neasden, Kilburn and Cricklewood. A higher quality environment will help increase footfall and support the vitality of these centres. Improved Wi-Fi coverage will also benefit town centre viability, enabling businesses to better promote themselves online and enticing visits to town centres from people looking to work remotely.

Environmental impacts are overall positive. The policy will reduce traffic volumes by promoting sustainable travel modes over vehicle use. The creation of attractive routes will promote walking and cycling. Increasing Wi-Fi coverage will also reduce the need to travel by car. This will reduce congestion, with associated benefits for air quality and carbon emissions.

The West London Orbital will increase the usage of the Dudding Hill Freight Line, which will increase noise pollution. However, reducing vehicles on the road network can also reduce noise pollution. Impacts are uncertain. As the West London Orbital utilises an existing freight line other visual and environmental impacts are likely to be neutral.

Healthy streets are designed to incorporate sustainable urban drainage systems and green infrastructure, which will help to reduce surface water flooding, promote biodiversity which could help improve water quality. Tree planting will also increase shade which can help mitigate the impacts of climate change. This will be of particular benefit to groups susceptible to rising temperatures, such as the elderly, by creating shaded spaces where it is comfortable to walk. The creation of high quality walking and cycling routes, can contribute to creating an attractive public realm. As will reducing car dominance along the A5.

Economic impacts are overall positive. Reducing road congestion will create a more efficient transport network, which will benefit business by improving reliability. Wi-Fi is increasingly important to businesses. Employees are increasingly required to adopt flexible working practices. Increased Wi-Fi coverage will enable home working and remote working from locations such as cafes. This may be of particular benefit to groups with reduced mobility levels by ensuring they can access training and employment opportunities from home. The West London Orbital will improve connections from the borough to Central London, Old Oak and Brent Cross. This will help open up access to job opportunities and reduce commuting times.

It is considered that this policy will have neutral impacts on people who have the following protected characteristics: gender reassignment, marriage and civil partnership, race, religion and belief, sex and sexual orientation. Designing to healthy streets standards could have particularly positive impacts for the protected characteristics of age, disability and pregnancy and maternity, as it creates a pedestrian environment which is easier to navigate with resting places. This could

be particularly beneficial for the visually impaired and those using wheelchairs or pushchairs. The West London Orbital could provide positive impacts for disability groups, pregnant women and people on maternity that may have reduced mobility, if stations provide step free access.

Alternative Policy: To prioritise travel by car

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	0	-	-	0	0	0	0	-	0	0	-	0	0	0	-	0	0	-	-	-	0	-	0	-

Social impacts are likely to be neutral or negative. Prioritising travel by car by public transport will result in increased levels of congestion, resulting in a road network which is unreliable. Travel by private vehicle does not create the same opportunities for interaction as active travel and public transport, so is unlikely to promote social integration or improve feelings of safety.

Prioritising travel by car will result in higher levels of road congestion and be detrimental to air quality. This will create an environment which is less appealing to walk and cycle in, which will lead to more sedentary lifestyle. Overall this will result in negative impacts for physical and mental health.

Under national and London Plan policy higher density development are to be promoted in areas with higher public transport accessibility levels. Prioritising travel by car will not increase public transport accessibility levels and therefore not enable housing delivery.

Prioritising travel by car may improve access to town centres for some, but a car dominated environment will not create centres which are attractive to spend time and linger. This could result in reduced footfall and spend. Impacts are likely to be neutral.

With the level of population growth, the borough will experience prioritising travel by car will increase road congestion, resulting in reduced air quality and carbon emissions.

Environmental impacts are likely to be negative. The creation of new roads will require additional land take. As Brent is a heavily urbanised borough the creation of new roads would require reconfiguration of existing uses, which could require compulsory purchase, or development on open space. This option could place pressure on existing open space.

Private vehicle use is a major contributing factor to carbon emissions and climate change.

Car travel is reliant on impermeable surfaces including the road network and parking spaces, which increase the flow of surface water run-off which is a contributing factor to flooding. There is scope to include planting as part of highway works, but this is more limited than on pedestrian and cycle routes due to the need for greater land take and operational requirements.

Economic impacts are likely to be negative. Increased reliance on the road network will result in higher levels of congestion and longer commuting times. An unreliable transport network will impact on the efficiency of business, particularly freight distribution.

It is considered that this policy will a neutral impact people who have the following protected characteristics: disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation, age. All groups will be impacted by congestion and associated environmental impacts.

Alternative Policy: To not enable the delivery of the West London Orbital

I/A Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	0	0	-	0	0	0	0	-	0	0	?	0	0	0	-	0	0	0	0	0	0	0	0	0

Social impacts are likely to be neutral or negative. Neasden, Church End and Harlesden will not benefit from improved access to public transport, therefore benefits in terms of reducing social exclusion will not be felt. An increase in public transport accessibility levels will not be achieved and housing delivery will not be enabled. Access to Church End, Harlesden and Neasden Town Centres will not be improved. Equally, access to competing centres will also not be improved so impacts are likely to be neutral.

Environmental impacts are likely to be neutral or negative. If the West London Orbital route is not delivered there will not be associated benefits in removing pressure from the road network. This includes reduced carbon emissions and air quality improvements. Whilst not delivering the West London Orbital will mean noise pollution does not increase along the line at set times, traffic volumes will increase which also generate noise pollution.

Economic impacts are likely to be neutral. The economic growth associated with better connections to Central London and Old Oak and Brent Cross opportunity areas will not be realised.

It is considered that this policy will have neutral impacts on people who have the following protected characteristics: disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation, age. This policy option would not result in a change to the existing situation.

Conclusion

Prioritising active and sustainable travel over private vehicle use results in a higher level of positive social, environmental and economic impacts. Reducing pressure on the road network will reduce air pollution, carbon dioxide emissions and improve efficiency for business. The IIA indicates this approach results in more positive impacts than promoting private vehicle use.

The West London Orbital has positive impacts associated with increasing housing delivery, reducing road congestion and increasing access to employment and services. One potential negative impacts are noise pollution due to increased services running along the line. The detailed design of the West London Orbital will need to consider how noise impacts can be mitigated.

Policy BT2: Parking and car free development

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	0	+	0	+	0	0	0	+	0	+	+	+	+	0	+	0	0	0	+	0	0	0	0	0

Social impacts are positive or neutral. Some groups are less mobile such as older people and disability groups, meaning reduced access to a vehicle could impact on their ability to access services and cause social isolation. However, the policy allows for car parking for blue badge holders, which are those identified to need car parking due to mobility issues. Car free is only sought in areas with good access to public transport, so people will still have good access to services, and some of those with a disability (e.g. those who are blind or partially sighted) may be more reliant on public transport. Reducing space in developments allocated to private vehicles will create a public realm which is more pedestrian friendly with greater opportunities for social interaction. Additionally, the London Plan sets minimum disabled parking standards, which would continue to apply. On balance impacts on social inclusion are anticipated to be neutral.

Promoting the use of active travel such as walking and cycling over private vehicle has recognised health benefits. Children aged five–18 are recommended to do at least 60 minutes of moderate intensity activity (brisk walking or cycling) each day, while adults are recommended to do 150 minutes each week in periods of ten minutes or more. Active travel will help ensure everyone is achieving

the level of exercise needed to stay physically healthy, which in turn has mental health benefits. Reducing harmful air pollution from private vehicles will also have positive health impacts. Air pollution caused by carcinogenic diesel emissions, high levels of nitrogen dioxide (NO₂) and particulate matter (PM) exacerbate health conditions and shorten the lives of Londoners. The communities suffering the most from poor air quality are often the most vulnerable in society.

The policy includes criteria to ensure off-street parking does not impact on the setting and character of the surrounding area. For example, by removing features such as trees or gardens. Cumulatively the loss of these features can detrimentally impact on the character of an area.

The policy allows for higher levels of car parking in areas with lower levels of access to public transport. This should ensure it does not impede access to essential services. The policy also protects against the loss of needed car parking in town centres.

Environmental impacts are predominantly positive. The policy will reduce traffic volumes by promoting use of public transport in areas with good access. There are environmental benefits associated with reducing traffic on the roads including improved air quality and reduced release of carbon dioxide.

Ensuring off-street car parking incorporates soft landscaping, permeable surfaces and preserves trees will cumulatively have benefits for biodiversity. It will also slow the flow of water to drains and water bodies, which will reduce the risk of surface water flooding and help to improve water quality.

Economic impacts are neutral. Some of the borough's employment areas are in areas with lower public transport access, meaning businesses can be more reliant on private vehicles. Restricting car parking could have detrimental impacts on these businesses. However, in setting car parking standards account has been taken of public transport accessibility levels have been considered and a level has been set which takes into account operational requirements. If parking is not controlled at all this will result in congestion on the road network which will reduce its reliability and be detrimental to the economy. Taking this into account impacts are likely to be neutral.

It is considered that this policy will have neutral impacts on people who have the following protected characteristics: disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation, age. London Plan policy sets minimum disabled parking standards which would continue to apply, therefore disabled groups would not be negatively impacted by this policy.

Alternative Policy : No policy																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	0	-	0	-	0	0	0	-	0	-	-	-	-	0	-	0	0	0	-	-	0	0	0	0
Social impacts are neutral or negative. Should policy set no controls on levels of car parking, this could result in car dominant developments. The result would be high levels of congestion on the road network, poor air quality. This would deter walking and cycling resulting in negative impacts to health and well-being. Environmental impacts are predominantly negative. Without a policy traffic volumes are likely to increase, resulting in poorer air quality and increased carbon emissions. This is likely to deter people from choosing active travel such as walking and cycling. Allowing off-street parking without any controls could result in the loss of trees and gardens, which will cumulatively impact on the character of an area. The cumulative loss of gardens and trees through the unmanaged creation of off-street parking in cumulating will impact on biodiversity. It will also increase surface water flooding due to an increase in impermeable surfaces. This could have negative impacts on water quality as green infrastructure can slow the flow of water and help to remove pollutants before it reaches a water body. No restrictions on parking could be beneficial for the operation of some businesses. However, this would increase congestion on the road network and reliability, which would ultimately negative impact on economic growth. It is considered that this policy will have no different effects on people who have the following protected characteristics: disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation.																								
Conclusion Not having a policy will result in negative social and economic impacts due to increased congestion impacting on air quality, increased carbon emissions and reducing active travel. Although there are potential negative impacts on groups with lower mobility, this is mitigated as the policy allows for blue badge parking and only requires car free development where there are good public																								

transport accessibility levels. In addition, allowing in unmanaged conversion of front gardens to car parking will cumulatively impact negatively on biodiversity, flood risk and water quality. The IIA indicates a policy is needed to manage car parking.

Policy BT3: Freight and servicing																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	0	+	0	0	0	0	+	+	0	0	+	0	0	0	+	0	0	0	0	+	0	0	+	0
Social impacts are generally neutral. Ensuring adequate servicing is important to the function of town centres therefore there may be some positive impacts on their vitality and viability. Promoting sustainable modes of travel over vehicles will help to improve air quality. Poor air quality is associated with respiratory disease, cardiovascular disease and asthma. This will have positive health impacts.																								
Environmental impacts are predominantly positive. Promoting the use of the Grand Union Canal and railway lines for freight takes pressure off the transport network and reduces congestion. This will reduce air pollution and carbon dioxide emissions.																								
Economic impacts are predominantly positive. The efficient movement of freight is important to economic growth, particularly given logistics is a future growth sector. It is also important for the function of our town centres. The use of the canal and rail can facilitate efficiency in freight distribution which will in turn attract inward investment.																								
There will be positive impacts on people who have the following protected characteristics: disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation, age. It is considered that all groups will benefit from efficient freight deliveries.																								
Alternative Policy: No policy																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	0	0	0	0	0	0	-	-	0	0	-	0	0	0	-	0	0	0	0	-	0	0	-	0

Social impacts are generally neutral. There will be potential negative impacts for the vitality and viability of town centres as servicing is essential to their functioning.

Environmental impacts are predominantly negative. Freight is a source of congestion on the borough's road network. If freight is not directed to more sustainable modes including canal and rail, it will continue to contribute to congestion, which will have negative impacts on air quality and carbon emissions.

Economic impacts are predominantly negative. Road congestion will impact on the reliability of freight movement which will have negative economic impacts and deter future investment in the borough's economy.

It is considered that this policy will have neutral impacts on people who have the following protected characteristics: disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation, age.

Conclusion

The preferred option will reduce road congestion resulting in positive environmental and economic impacts. In addition, ensuring sufficient servicing will have benefits for the function and on-going viability of town centres. The IIA indicates a policy is needed to promote freight by sustainable modes and ensure adequate servicing of development.

Policy BT4: Forming an Access onto a Road

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	0	+	0	+	0	0	0	+	0	0	+	+	+	0	+	0	0	0	+	+	0	+	0	+

Social impacts are generally neutral or positive. As the focus of the policy is access on to the highway network impacts on the majority of social objectives are anticipated to be neutral. Ensuring road access is located at a safe point and requiring a safety audit for major developments abutting the North Circular Road will reduce road accidents, creating a safer environment to walk and cycle. This will have a positive impact on health and well-being. The creation of off street parking can impact on the quality of surroundings by resulting in the removal of trees and planting. This policy makes visual impact a consideration when assessing the suitability of off-street parking. This will have a positive impact on quality of surroundings.

Environmental impacts are predominantly positive. By creating a safer road environment this policy will help to encourage walking and cycling. It will also reduce road congestion by managing traffic flow on to the Transport for London Route Network and London Distributor Roads. In turn this can have positive impacts on air quality and reduce carbon emissions. This policy can have positive impacts on townscape by ensuring the creation of off-street parking doesn't negatively impact on public realm through the loss of trees. The protection of trees can have positive impacts as they support biodiversity and can help reduce flood risk.

Economic impacts are predominantly positive an efficient road network is important to economic growth, improved accessibility and efficient freight distribution.

This policy will have a positive impact on road safety which will benefit all groups. This policy will therefore have a positive impact on groups with the following protected characteristics: disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation, age.

Alternative Policy : No policy

I/A Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	0	-	0	-	0	0	0	-	0	0	-	-	-	0	-	0	0	0	-	-	0	-	0	-

Impacts in relation to social objectives are generally neutral, with negative impacts anticipated on health and well-being. Allowing access point to be created onto a road without consideration for road safety could increase road accidents and negatively impact on health and well-being. Without a policy off-street parking could be created without any consideration to visual impact including loss of trees. This would be detrimental to quality of surroundings.

Environmental impacts are predominantly negative. Allowing the creation of additional access points on to the highway network in an unmanaged way will increase road congestions which will have negative impacts on air quality and increase carbon emissions. The unmanaged creation of off-street parking will result in the loss of trees and other landscaping, which cumulatively will have negative impacts on biodiversity, flood risk and townscape.

Economic impacts are predominantly negative. Failure to manage the road network and the creation of congestion can have negative impacts on economic growth. It will slow down the movement of freight and people to work, which will impact on business.

It is considered that this policy will have a negative impact on people who have the following protected characteristics: disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation, age. All groups will be affected by a failure to manage access onto the road network.

Conclusion

Failure to manage access onto the road network will create road congestion and could impact on the safety of road users. This will result in negative social, economic and environmental impacts. In addition, allowing the creation of off-street parking without consideration of visual impacts could have negative environmental impacts through the loss of trees. The IIA indicates a policy is needed to control access on to the highway network to mitigate potential detrimental impacts from development.

Policy BCGA1: Wembley Growth Area

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	+	+	0	+	+	+	-	+	+/-	+	+	+	+/-	+	+	+	?	+	+	+	+	+

Social impacts are considered to be positive. The policy will promote social inclusion and narrow inequalities, improve the health of the population by way of driving the economic regeneration of Brent, creating a sustainable city quarter with a variety of new jobs in different sectors. The policy will increase accessibility to health facilities through the creation of new public open spaces and new health facilities and will increase housing delivery in an area with anticipated employment growth and good transport links. Development will be focused around areas with high transport accessibility, and the council regularly liaises with TfL regarding bus routes. The Local Plan is aligned with the Transport Local Implementation Plan which sets out how improvements will be secured. This will help to ensure that residents – for example, those with a disability – are not isolated within areas where transport accessibility has failed to improve.

Environmental impacts are considered to be positive, due the policy supporting improvements to ensure that physical pedestrian and cycle route linkages from Wembley Triangle to Forty Lane / Bridge Road will be provided, in addition to proposed naturalisation of Wealdstone Brook and supporting to energy efficient design and renewable energy. The policy also encourages the provision of new public open space including a 7-acre park.

Economic impacts are considered to be positive due to increased employment and investment opportunities.

Due to the policy being of benefit to all residents, it is considered that there will be a positive impact on the following groups: age, sex, sexual orientation, gender reassignment, disability, religion and belief, ethnicity, marriage and civil partnership, pregnancy and maternity.

In conclusion, the policy will result in positive economic, social and environmental impacts that will ensure that good growth takes place in the Wembley Growth Area.

Policy BNGA1: Burnt Oak / Colindale Growth Area

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	+	+	0	0	+	+	-	0	+/-	+	+	+	0	0	+	+	?	+	+	+	0	+

Social impacts are considered to be positive. The delivery of over 2000 new homes will contribute towards the overall housing numbers required to provide everybody with an opportunity to live in a home which is suitable to their identified needs. Provision of new play areas and open space will contribute towards health and wellbeing.

Environmental impacts are considered to be positive. Seeking to reduce traffic dominance of Edgware Road through public realm improvements, including urban greening, will contribute towards environmental health and supporting an attractive and clean environment, enhancing the borough's landscape and townscape. Reduced car dependency will also contribute towards improved environmental health and mitigate against climate change. Creating a sense of place through quality design that compliments the existing heritage of the area will also enhance the borough's landscape and townscape.

Economic impacts are considered to be positive. Proposed new ground floor commercial and employment uses will contribute towards employment opportunities and help to promote sustainable, resilient and inclusive economic growth. The existing LSIS sites will be subject to master planning with a view to being regenerated, to provide updated employment space that meets existing and future needs, through co-location with other uses. This will help to facilitate both indigenous and inward investment in the borough.

Due to the policy being of benefit to all residents, it is considered that there will be a positive impact on the following groups: age, sex, sexual orientation, gender reassignment, disability, religion and belief, ethnicity, marriage and civil partnership, pregnancy and maternity.

In conclusion, the policy will result in positive economic, social and environmental impacts that will ensure that good growth takes place in the North area of Brent.

Policy BSGA1 – Church End Growth Area

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	+	+	+	+	+	+	-	0	+/-	+	+	+	0	+	+	+	?	+	+	+	+	+

Social impacts are considered to be predominantly positive. The policy proposes the delivery of 1040 new homes, supported by social and physical infrastructure, including a new space to serve as an employment, community and health hub. This will help reduce social exclusion, increase health and wellbeing and contribute towards providing everybody the opportunity to live in a home which is suitable to their identified needs. Mixed used regeneration and revitalisation of the local centre will use the highest standards of urban design, which will change the perception to a busy, thriving, safe and secure neighbourhood, which will enhance community safety.

Environmental impacts are considered to be predominantly positive. The policy proposes enhancements to Church End Open Space and Willesden Jewish Cemetery, and increased greening through tree planting and creation of new open space in site allocations.

Economic impacts are considered to be predominantly positive. A new 6th form entry secondary school and college will support maximisation of education and skills, while redevelopment of industrial sites for co-location to secure investment in new employment floor space will encourage both indigenous and inward investment within the borough.

Due to the policy being of benefit to all residents, it is considered that there will be a positive impact on the following groups: age, sex, sexual orientation, gender reassignment, disability, religion and belief, ethnicity, marriage and civil partnership, pregnancy and maternity.

In conclusion, the policy will result in positive economic, social and environmental impacts that will ensure that good growth takes place in the Church End Growth Area of Brent.

Policy BSEGA1 – South Kilburn Growth Area																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	+	+	+	+	+	+	-	0	+/-	+	+	+	0	+	+	+	?	+	+	+	+	+
Social impacts are predominantly positive. The policy promotes the re-provision of social rented housing for existing tenants of South Kilburn, and elsewhere a mix of tenures to meet the needs of the wider population, linking into ensuring that everybody is able to live in a home that meets their needs. The provision of a new South Kilburn Health Centre within the Peel Site will support health and wellbeing, while theretention of the enterprise hub and community space will support community identify and community cohesion. Environmental impacts are predominantly positive. The policy promotes the enhancement of public realm and increased tree planting, and the extension of South Kilburn Park and additional public open space. Economic impacts are predominantly positive. The expansion of the South Kilburn Park Junior School and Carlton Vale Infant School will help to maximise the potential for everybody to contribute economically through increasing and improving the provision of education facilities, while the enhancement of retail provision in the neighbourhood parade on Malvern Road will help to support the viability and vitality of the local economy. Due to the policy being of benefit to all residents, it is considered that there will be a positive impact on the following groups: age, sex, sexual orientation, gender reassignment, disability, religion and belief, ethnicity, marriage and civil partnership, pregnancy and maternity. In conclusion, the policy will result in positive economic, social and environmental impacts that will ensure that good growth takes place in the South East area of Brent.																								

Policy BSWGA1 – Alperton Growth Area																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	+	+	0	+	+	+	-	0	+/-	+	+	+	+	+	+	+	?	+	+	+	0	+
Social Impacts are considered to be predominantly positive. The policy supports an increase in housing delivery by way of provision of over 6000 additional homes, increasing the opportunities for everybody to live in a home which is suitable to their identified needs. The policy also supports the provision of a new nursery and health facilities, and multi-use community centres, which will support improved health and wellbeing and community cohesion, reducing social exclusion. Environmental Impacts are considered to be predominantly positive. Investment in the canal and its setting will enhance its role as an important environmental, recreational and movement corridor. Energy efficient design and renewable energy are encouraged, to help to mitigate against climate change. The policy also proposes improvements to existing public open space, the creation of a new 1-hectare public open space, and new tree planting. Economic impacts are considered to be predominantly positive. The policy proposes that Alperton will be encouraged to become an enterprise hub, principally through new business and employment floorspace within residential developments. This will increase employment opportunities and will encourage investment. Due to the policy being of benefit to all residents, it is considered that there will be a positive impact on the following groups: age, sex, sexual orientation, gender reassignment, disability, religion and belief, ethnicity, marriage and civil partnership, pregnancy and maternity. In conclusion, the policy will result in positive economic, social and environmental impacts that will ensure that good growth takes place in the Alperton Growth Area.																								

7. Publication Stage Site Allocations Appraisal

7.1 Due to changes in the methodology of appraising site allocations following the Publication Stage of consultation, all site allocations have been re-assessed. The previous Publication Stage Site Allocations Appraisals can be found in the [Publication Stage Integrated Impact Assessment](#).

7.2 Submission Stage Site Allocation Assessments can be found in Chapter 9.

8. Submission Stage Local Plan Policies

- 4.1. This chapter details the final chosen policies for the Submission Stage of the Local Plan, as assessed against the IIA framework.
- 4.2. A number of major and minor modifications have been made to the Local Plan following comments received at Publication Stage. However, not all of these have resulted in changes to the appraisals of the associated policies. Additionally, some of these may have resulted in changes to the appraisals of the policies but not resulted in any changes to the scores of the policies against the identified objectives. The following policies have not experienced any major or minor modifications that have resulted in any changes to appraisals or scores when measured against IIA objectives: DMP1, BD1, BD2, BD3, BH2, BH5, BH6, BH7, BH8, BH9, BH10, BH11, BH12, BH13, BSI1, BE1, BE4, BE5, BE6, BE7, BE8, BE9, BHC1, BHC2, BHC3, BHC4, BHC5, BGI1, BGI2, BSUI1, BSUI2, BSUI3, BSUI4, BT1, BT2, BT3, BT4, BP1, BP7.
- 4.3. Scoring and appraisal changes are outlined below. Assessments of the policies discussed in the table below can be found later in this chapter.

IIA scoring and appraisal changes as a result of Major Modifications

Policy Ref	Proposed Changes to Policy Appraisal in IIA	Proposed IIA Scoring Changes
BP2	Change from intensification of “employment” to “particular business and industrial” to reflect the proposed change to policy	No change. The IIA Objectives do not refer to particular job types / business types
BP2	Addition of reference to provision of new education, health and cultural facilities	Change EC4 from “minor positive” to “significant positive” due to provision of new educational facilities in a large area

		• Change S1 from “minor positive” to “major positive” due to provision of new community facilities in a large area • Change S2 from “minor positive” to “major positive” due to provision of new health facilities in a large area • Change S7 from “minor positive” to “major positive” due to provision of a range of new facilities in a large area
BP3	Addition of reference to provision of new education, health and cultural facilities	• Change EC4 from “minor positive” to “significant positive” due to provision of new educational facilities in a large area • Change S1 from “minor positive” to “major positive” due to provision of new community facilities in a large area • Change S2 from “minor positive” to “major positive” due to provision of new health facilities in a large area • Change S7 from “minor positive” to “major positive” due to provision of a range of new facilities in a large area
BP4	Addition of reference to provision of new education, health and cultural facilities	• Change EC4 from “neutral” to “significant positive” due to provision of new educational facilities in a large area • Change S1 from “minor positive” to “major positive” due to provision of new community facilities in a large area • Change S2 from “minor positive” to “major positive” due to provision of new health facilities in a large area • Change S7 from “minor positive” to “major positive” due to provision of a range of new facilities in a large area
BP5	Addition of reference to provision of new education, health and cultural facilities	• Change EC4 from “neutral” to “significant positive” due to provision of new educational facilities in a large area • Change S1 from “minor positive” to “major positive” due to provision of new community facilities in a large area • Change S2 from “minor positive” to “major positive” due to provision of new health facilities in a large area • Change S7 from “minor positive” to “major positive” due to provision of a range of new facilities in a large area

BP6	Addition of reference to provision of new education, health and cultural facilities	• Change EC4 from “minor positive” to “significant positive” due to provision of new educational facilities in a large area • Change S1 from “minor positive” to “major positive” due to provision of new community facilities in a large area • Change S2 from “minor positive” to “major positive” due to provision of new health facilities in a large area • Change S7 from “minor positive” to “major positive” due to provision of a range of new facilities in a large area
BH1	Minimum housing numbers have reduced from 27,482 to 23,250.	No change to scorings. The reduction in numbers mainly relates to small sites, and as such there are not considered to be any changes.
BH3	Addition of reference to “build to rent”.	No change to scorings. It is not considered that this would result in any changes to social objectives as generally the affordability of build to rent products will be the same as those of private rented products.
BH4	The policy has been amended to provide more detail and justification given the removal of H2A from the Intend to Publish version of the London Plan. While the policy still emphasises that the development of small sites within priority locations of PTAL 3-6 will be supported, the amended policy notes the support of such developments within intensification corridors and town centre boundaries. The amended policy also gives more detail as to the requirements for proposed developments outside of these priority locations, including weight being given to the existing area’s character, access to public transport and social infrastructure, prejudicing more comprehensive development and being required to deliver an Urban Greening Factor of 0.4.	• Change EN12 from “neutral” to “minor positive” due to the added emphasis on the Urban Greening Factor having potential to reduce flood risk on sites • Change EN9 from “neutral” to “minor positive” due to the added emphasis on the Urban Greening Factor having potential to reduce overheating / the urban heat island effect • Change EN5 from “neutral” to “minor positive” due to the added emphasis on the Urban Greening Factor having potential to provide increased opportunities for green infrastructure / biodiversity Even though the new policy may result in more homes being built (due to increased flexibility), it is not considered that this would result in S3 changing from “minor positive”.

BE2	Change from securing new “employment” floorspace to “industrial” to reflect the policy	No change. The IIA Objectives do not refer to particular job types / business types
BE3	Clarify that protection of employment sites refers to sites in industrial use, to reflect change to policy.	No change. The IIA Objectives do not refer to particular job types / business types

Updated Policy Assessments

Policy BP2: East																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	++	++	+	+	0	++	++	++	-	+	+/-	+	+	+	0	0	+	+	+	++	+	++	++	+
Social impacts are considered to be positive. Social inclusion will be increased and opportunities will be provided for everybody to live in a home which his suitable to their identified need through the potential residential development for Staples Corner Growth Area and Neasden Station's Growth Area, taking into account potential specific requirements around different housing types, such as specialist (older people / supported / student) housing and build to rent. Community identity will be supported through securing the retention of the area's religious buildings. Positive social impacts are also anticipated through the provision of new education, health and cultural facilities.																								
Environmental impacts are considered to be positive. Attractive and clean environments will be enhanced through conserving and enhancing heritage assets such as Church Lane and Neasden Conservation Areas and improvements to public realm and connectivity in the town centres. The environment and open spaces will be enhanced through supporting the contribution of high quality open spaces and wildlife corridors, including maintaining and enhancing existing parks and groups and tree planting and associated landscaping around the North Circular Road / A5, and others.																								
Economic impacts are considered to be positive due to encouraging efficient infrastructure to support economic growth by safeguarding land for the West London Orbital (WLO) Route and associated infrastructure and reducing traffic dominance on the A5 corridor and North Circular Road. Creation of high quality pedestrian connections from Brent Cross West Thameslink station to Staples Corner will reduce traffic dominance. Any new stations delivered as part of the WLO would have lift access, which would have positive impacts on protected groups																								

with limited mobility, such as disability, age, and pregnancy and maternity. The policy also increases employment opportunities through supporting the provision of new educational facilities, and any additional small scale retail / other uses floorspace and retaining and encouraging intensification of particular business and industrial uses at Kingsbury LSIS. In combination with other policies (e.g. BE1 – Economic Growth and Employment Opportunities for All – which seeks to secure Employment, Apprenticeship and Training Plans as part of developments of 3,000sqm or more), this could be particularly beneficial to particular under-represented protected groups (e.g. women, disabled people, BAME groups).

Due to the policy being of benefit to all residents, it is considered that there will be a positive impact on the following groups: age, sex, sexual orientation, gender reassignment, disability, religion and belief, ethnicity, marriage and civil partnership, pregnancy and maternity. In particular, in relation to disability, directing development towards public transport corridors and safeguarding land for the WLO route is likely to have positive impacts in terms of accessibility.

Conclusion: The proposed policy will result in positive economic, social and environmental impacts that will ensure that good growth takes place in the East place of Brent.

Policy BP3: North

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	++	++	+	+	0	+	++	+	-	0	+/-	+	+	+	0	0	+	+	?	++	+	++	++	+

Social impacts are considered to be positive. The policy supports the continued residential development in the Burnt Oak and Colindale Growth Areas, which will encourage prosperity. Additionally, the policy will secure sufficient physical and social infrastructure to support the increase in population which will promote social inclusion and help to narrow inequalities within the borough. The policy will also improve health and wellbeing through identifying opportunities for a new leisure facility incorporating swimming pool provision and improve the quality of strategic sports hall sites. Positive social impacts are also anticipated through the provision of new education, health and cultural facilities.

Environmental impacts are considered to be positive. The policy will help to enhance and maintain attractive and clean environments and to protect and enhance the historic environment by way of conserving and enhancing designated heritage assets in the area, and ensuring that development respects the predominantly suburban low rise character of the area. The policy also supports improvements to public realm, building upgrades and shop façade improvements in Colindale / The Hyde and Burnt Oak. The policy supports enhancements to open

spaces and creation of new public spaces, and aims to reduce traffic dominance and enhance A5 corridor, which will improve environmental health. Although the policy seeks to reduce traffic dominance, this will not have a negative impact on those who are reliant on cars (e.g. those with a disability) as higher car parking standards will still apply in areas with low PTAL ratings. Additionally, the policy aims to reduce traffic dominance partly through the creation of new cycling links between key destinations – by offering a greater variety of choice in how residents travel between key destinations, traffic dominance may be reduced, therefore leading to a positive impact on those who are still required to drive due to limited mobility.

Economic impacts are considered to be positive. The co-location of Capitol Valley and Honeypot Lane LSIS will help to facilitate both indigenous and inward investment in the borough. Residential development within various locations at Kingsbury town centre will help to support its vitality and viability, and an increased net provision of comparison and convenience goods floorspace, directed towards the town centres will contribute towards the employment offer in the borough.

Due to the policy being of benefit to all residents, it is considered that there will be a positive impact on the following groups: age, sex, sexual orientation, gender reassignment, disability, religion and belief, ethnicity, marriage and civil partnership, pregnancy and maternity.

Conclusion: The preferred policy will result in positive economic, social and environmental impacts that will ensure that good growth takes place in the North place of Brent.

Policy BP4 – North West

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	++	++	+	+	0	0	++	+	-	0	+/-	+	+	+	0	0	+	++	?	+	+	+	++	+

Social impacts are considered to be positive. Housing delivery (being able to provide everybody with the opportunity to live in a home which is suitable to their identified needs) will be increased through the provision of approximately 2600 new homes including specialist accommodation to meet identified demand, and delivery of mixed-use development on the Sainsbury's Kenton Road site. Health and wellbeing will be enhanced through the protecting and enhancing playing pitch provision and encouraging community use of Byron Court Primary School's sports facility and improvements to the university hospital. Positive social impacts are also anticipated through the provision of new education, health and cultural facilities.

Environmental impacts are considered to be predominantly positive. The policy will result in an improved setting of and better integration of open space within the site to Northwick Park, and will result in enhanced landscape and townscape through continuing to conserve and enhance designated heritage assets and protecting where possible the established metro-land characteristics of the place. Biodiversity will be conserved and enhanced through protecting and enhancing wildlife corridors and pursuing opportunities to create a local nature reserve at Ducker Pool. Improvements to Northwick park station and implementation of cycle ways will reduce traffic.

Economic impacts are considered to be positive. The policy supports provision of enhanced or redeveloped university facilities, the creation of new convenience floorspace, and the retention and intensification of SIL Land at East Lane Business Park.

Due to the policy being of benefit to all residents, it is considered that there will be a positive impact on the following groups: age, sex, sexual orientation, gender reassignment, disability, religion and belief, ethnicity, marriage and civil partnership, pregnancy and maternity.

Conclusion: The preferred policy will result in positive economic, social and environmental impacts that will ensure that good growth takes place in the North West place of Brent.

Policy BP5 – South

I/A Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	++	++	+	+	0	+	++	+	-	0	+/-	+	+	+	0	+	+	+	+	+	+	+	++	+

Social impacts are predominantly positive. The policy proposes the extension of Church End Growth Area to include adjoining industrial sites to provide a mixed use neighbourhood, which will encourage prosperity and increase housing delivery. Church End town centre is also to provide a market for local communities, which will support social inclusion and community identity, and a new space within Church End Growth Area will serve as an employment, community and health hub, supporting health and wellbeing. Positive social impacts are also anticipated through the provision of new education, health and cultural facilities.

Environmental impacts are predominantly positive. The policy proposes the conserving and enhancing of heritage and cultural assets and their setting, in particular that of Neasden Temple and Harlesden Conservation Area. This will help to maintain an attractive and clean environment and protect and enhance historic environments and cultural assets. Environmental enhancements will reduce flood risk, and

enhancements to open space and prioritising tree planting in areas of poor air quality, particularly along the North Circular Road, will promote climate change adaption.

Economic impacts are predominantly positive. The policy supports the engaging with the community of St Raphael's Estate to develop a strategy as a potential area of change, to deliver more homes, thereby supporting resilient and inclusive economic growth. The policy also aims to protect and enhance Harlesden town centre's retail and evening economy, including new convenience and comparison retail floorspace, supporting the local economy. Co-location of employment and residential uses at Church End LSIS, and encouragement of intensification of employment uses at Brentfield LSIS will facilitate both indigenous and inward investment within the borough. As will supporting the establishment of new Creative Quarters at Harlesden. A new 6th form entry secondary school and college will help to maximise education and skills.

Due to the policy being of benefit to all residents, it is considered that there will be a positive impact on the following groups: age, sex, sexual orientation, gender reassignment, disability, religion and belief, ethnicity, marriage and civil partnership, pregnancy and maternity.

Conclusion: The preferred policy will result in positive economic, social and environmental impacts that will ensure that good growth takes place in the South place of Brent.

Policy BP6 – South East

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	++	++	+	+	0	+	++	+	-	0	+/-	+	+	+	0	+	+	+	?	+	+	+	++	+

Social impacts are considered to be predominantly positive. The policy promotes the delivery of 3400 high quality new homes in South Kilburn Growth Area, with a target of 50% affordable housing including social rented for existing secure tenants of South Kilburn. This will help to ensure that everybody is provided with an opportunity to live in a home which is suitable to their identified needs. The policy also promotes the securing of infrastructure in South Kilburn, including a new community space and enhancement and protection of leisure provision and playing pitches. This will increase community cohesion and health and wellbeing. Positive social impacts are also anticipated through the provision of new education, health and cultural facilities.

Environmental impacts are considered to be predominantly positive. Safeguarding land for the West London Orbital Route will help to ensure that traffic can be reduced in the future. The enhancement of cycle links and to open space will also create beneficial environmental impacts.

Economic impacts are considered to be predominantly positive. The policy proposes to protect and enhance the Queen's Park Creative Quarter and South Kilburn Enterprise Hub, and to enhance and protect Kilburn Town Centre's evening economy, which together will promote and protect employment opportunities.

Due to the policy being of benefit to all residents, it is considered that there will be a positive impact on the following groups: age, sex, sexual orientation, gender reassignment, disability, religion and belief, ethnicity, marriage and civil partnership, pregnancy and maternity.

Conclusion: The preferred policy will result in positive economic, social and environmental impacts that will ensure that good growth takes place in the South East place of Brent.

Policy: BH1 INCREASING HOUSING SUPPLY IN BRENT																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	+	?	?	?	?	-	-	?	-	?	?	?	-	-	?	+	+	+	?	+	+	?
Although not exclusively for Brent residents provision of significantly more homes in the borough will have positive impacts in relation to social inclusion, health and well-being, living in a home which needs, open space, flooding, economic growth, indigenous and inward investment, maximise population’s economic potential. For example, it will address issues of people being placed in temporary accommodation, overcrowding and accommodation which is too expensive and in some cases eliminates potential available disposable income, with the associated adverse impacts on life chances. This will serve to increase opportunities for those most vulnerable within the borough, acting to reduce any differential between those who share a protected characteristic and those who do not. More homes at more affordable prices will assist the economy by limiting wage inflation, allowing more employees to live nearer to work, support existing and new firms’ investment in the area and provide training opportunities/ apprenticeships in the building trade for local people. Wholesale changes to areas through master-planning or appropriate planning permissions should provide more opportunities for provision of more formal open space on current brownfield land covered by buildings. It should allow investment in existing open spaces through developer contributions, which in some cases are under-used and reduce surface water run-off which previously hasn’t been controlled to greenfield run-off rates.																								

Impacts will be uncertain in relation to the environment, community safety, recognising Brent's diversity, the vitality and viability of town centres, bio-diversity, townscape, historic and cultural assets, water quality and resources, flora and fauna, landscape and townscape, historic environment and cultural assets, soil quality, local employment, infrastructure to support growth. The limited availability of land in Brent will however potentially impact in both positive and negative ways, with overall uncertain outcomes in relation to a number of aspects. Whilst the need to build homes will mean investment in the existing built environment, which will be positive in dealing with run-down or derelict sites including those of an historic nature, intensification of land use will result in higher plot ratios. This will increase either buildings' site coverage and/ or heights, reducing space for green infrastructure and potentially increasing perceptions of development not of a human scale and of an increased feeling of enclosure. Whilst interventions such as including on site green infrastructure might overcome some impacts, it is difficult to know whether these will be able to fully compensate for undeveloped space lost. Pressure to use land to a greater extent and the economic value of homes could displace more economically marginal uses, such as cultural assets, or business premises, etc., which might not be overcome by policies which seek to seek re-provision, or new facilities.

It is likely to have adverse impacts on reducing the effect of traffic on the environment, reducing the production of waste, air quality, reducing greenhouse gas emissions and mitigating climate change. Again whilst other policies will help to reduce the potential for adverse impacts, additional housing against a backdrop of overall population growth will probably result in these adverse impacts. Increased traffic is likely as not all development will be in areas with high public transport accessibility, construction is a significant contributor of waste even when reusing properties, homes will require energy to function, even if it is less than traditionally consumed and increased buildings will increase temperatures due to their increased thermal mass.

It is considered that this policy will have a neutral impact on people who have the following protected characteristics compared to the wider population: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation. At a general level the provision of additional homes is more likely to allow those with protected characteristics to better meet their needs, as it will provide more choice and possibly result in reductions in costs of property. This could benefit those with protected characteristics who often do not have the purchasing power of others, but will more likely rely on other policies in the plan to ensure that targeted needs, such as affordable housing, mobility housing, specialist housing and family housing are provided. For those with the protected characteristics of age, pregnancy and maternity and disability, impacts on accessibility and car parking would be considered under other policies (design policies, parking policies, and London Plan policies).

Policy: BH3 BUILD TO RENT																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	+	0	0
The policy will have minor positive impacts in relation to social inclusion, homes to meet needs, business and inward investment. The incorporation of private rented and Built to Rent will assist to some extent in addressing social inclusion by potentially providing a better market rented product compared to that offered by some small scale landlords, and in terms of meeting needs might better address those who are unable to buy properties but able to rent. This may also serve to increase the availability of specialty housing such as those designed for disabled residents, raising them up from potentially compromised living conditions and providing them with greater power of choice. Provision of additional rented properties will allow for a more flexible workforce able to move to work opportunities quicker/ easier and thus potentially increase inward investment by businesses. The policy will have neutral impacts compared to the provision to housing for sale on health, high quality environment, community safety, diversity, accessibility, traffic, waste, water, environmental health, townscape, historic environment, climate change, soil, open space, flood risk, employment opportunities, education and skills and infrastructure. There is unlikely to be a significant differentiation between build to rent and owner-occupation led housing on these matters. The policy is likely to have a mix of positive, neutral and negative impacts on age, disability, pregnancy and maternity, gender reassignment, marriage and civil partnership, race, religion and belief, sex and sexual orientation. The policy could have a positive impact on disabled groups by way of potentially raising them up from compromised living conditions by providing greater power of choice. The provision of rental properties is part of a wider attempt to increase the overall volume of dwellings built. As such it might have a positive impact on some of those with protected characteristics who are currently unable to meet their housing needs in the open market, but who have the purchasing power to attain solutions if capacity was available. For those who are unable to afford market dwellings, some affordable housing will be provided with these dwellings, but the amount of affordable dwellings and discount on rents is in many cases likely to be lower than that delivered in association with conventional housing, meaning that benefits to those who might have less ability to have choices due to limited incomes (more likely to be the young/old, disabled, pregnant/ maternity, females, gender reassigned and race) is uncertain. Overall, it is likely to increase the amount of affordable homes delivered, however the rents on these properties are in the majority of cases likely to be higher than the affordable housing provided in conventional housing schemes.																								

Policy: BH4 SMALL SITES AND SMALL HOUSING DEVELOPMENTS IN BRENT																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	0	+	0	0	0	+	+	0	0	+	+	0	0	+	+	0	0	+	0	0	0	0	0
The policy will have minor positive impacts in relation to social inclusion, homes that meet needs, accessibility, traffic, air pollution, greenhouse gas emissions. The emphasis on ensuring that the dwellings have good access to public transport will provide homes that better meet the needs of those with no private transport, those who may be unable to drive due to a disability, or who require access to facilities, such as those who are physically disabled, increasing their opportunities. This will produce benefits in terms of reducing reliance on the private car and therefore associated traffic generation, air pollution and greenhouse gases, although it may result in fewer homes being provided than if there was no such emphasis on good access to public transport being a requirement. The policy, however, does still allow for some flexibility outside of the identified priority locations.																								
The policy will have neutral impacts on health, high quality environment, community safety, diversity, waste, water, townscape, historic environment, soil, open space, employment opportunities, education and skills and infrastructure. Positive impacts are expected in relation to climate change adaption, flood risk, and biodiversity.Whilst areas that benefit from higher levels of public transport accessibility are more likely to have been developed more densely than lower suburban areas, they also are usually more historic in their character as they have been along main travel corridors. Increased development in these areas could potentially impact on character whilst giving greater likelihood of the character of lower PTAL areas remaining unchanged. In relation to impacts on other objectives there is unlikely to be significant differentiation between homes in PTAL 3-6 and PTAL 0-2 on these matters. However, some positive impacts are anticipated due to possible environmental impacts from the Urban Greening Factor.																								
There will be a positive impact on the following groups: age, disability, pregnancy and maternity, sex, gender reassignment and race, as the young / old, disabled, pregnant and on maternity leave, female, gender reassigned and black and minority ethnic groups are more likely to be economically disadvantaged and therefore more reliant on having facilities close by, or having access to alternatives such as good public transport that provides the opportunity to greater access to facilities. Many of Brent’s larger, lower density homes are occupied by extended families principally formed from BME groups who need larger homes to meet their needs. The policy does not negatively impact any particular groups by focusing small sites development in areas which will already tend to be well-connected and it still allows for some flexibility outside of the identified priority locations.																								

There will be a mixed / unclear impact on all other protected groups (religion and belief, sexual orientation and marriage and civil partnership). This is because the policy could reduce the potential delivery of homes on small sites due to small sites being focused in locations with genuine reasonable public transport alternatives. This could be to the detriment of those in housing need.

Policy BE2: Strategic Industrial Location (SIL) and Locally Significant Industrial Sites (LSIS)

I/A Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	?	?	+	?	+	0	0	+	0	?	-	?	+	0	?	0	+	0	0	+	?	+	0	+

Impacts are predicted to be positive or uncertain in relation to social objectives. The policy has the potential to secure new industrial floorspace which could in turn increase employment and prosperity, with associated benefits to health and well-being. In the short to medium term businesses may be displaced resulting in a loss of employment, making potential impacts uncertain. In terms of housing delivery this option will have significant positive impacts as it will result in additional housing. At the moment the majority of SIL and LSIS in the borough are in a poor environmental quality. Redevelopment will improve the quality of the environment but the benefits may be negated by the potential for noise concerns from co-locating residential and industrial uses. Introducing residential into industrial areas will increase footfall and overlooking on an evening which can increase feelings of safety and reduce crime.

Mixed environmental impacts are predicted. Co-location can reduce the need to travel to work which can have positive impacts. Each SIL and LSIS has been scored against I/A criteria to assess its sustainability for housing. Sites identified as suitable for co-location have good public transport accessibility levels, or will benefit from future planned investment in transport infrastructure. Development in these locations will be less reliant on private vehicles and place less pressure on the transport network.

By protecting some areas of SIL and LSIS for industrial uses, this allows the potential for energy from waste and the circular economy. Increasing housing and employment will generate additional waste, making overall predicted impacts neutral.

Some of Brent's SIL and LSIS sites are adjacent the Grand Union Canal. Through redevelopment there is potential to enhance the waterfront and improve water quality and biodiversity through planting and green sustainable urban drainage systems. Therefore, potential positive impacts are uncertain in relation to criteria EN3.

Industrial uses can generate noise and air pollution. Locating housing next to industrial uses could have negative impacts on amenity and there will be a need for this to be carefully managed. Protecting some areas of SIL and LSIS for purely industrial uses allows uses which could have the most detrimental impacts to locate elsewhere.

Redevelopment could result in enhancements to landscape setting through the creation of a higher quality environment. There are a limited number of heritage assets within Brent's industrial areas. Other policies will protect these assets commensurate with their significance therefore impacts should be neutral.

Increased development will increase energy consumption. Intensification of uses does create the scope for district heating networks and modern development is required to meet higher sustainability standards, so there may be positive impacts associated with the redevelopment of older less efficient buildings.

This has potential to introduce sensitive residential development into areas of flood risk. However, a sites suitability for co-location has been informed by an assessment of potential flood risk, making overall impacts neutral. Modern development incorporating Sustainable Urban Drained Systems could help increase permeability and reduce flood risk.

This policy promotes the efficient use of brown field land, which could have positive impacts in reducing the need to develop on green field and open space. Redevelopment would also be subject to remediation of any contamination.

Economic impacts are anticipated to be predominantly positive. Housing has higher values and therefore can help subsidise the creation of new employment floorspace. This in turn can generate job opportunities. This policy balances facilitating investment in SIL and LSIS, whilst protecting some employment sites for businesses which are not suitable for co-location. During construction there is potential that some businesses will be displaced which could have negative impacts on employment in the short to medium term, but the policy seeks to mitigate this by ensuring there are employment sites within the borough displaced businesses could relocate to. Co-location of employment and housing will have positive benefits in reducing commuting and improving access to employment.

It is considered that this policy will have a neutral impact on people who have the following protected characteristics: gender reassignment, marriage and civil partnership, age, religion and belief, race, sex and sexual orientation. The purpose of the policy is to ensure land is fully utilised both for employment and housing. This should benefit all groups. Creating mixed neighbourhoods can create sustainable places and reduce travelling times. However, the policy could have a positive impact on the protected characteristics of sex, pregnancy and maternity and disability as it may have particular benefits to those with caring responsibilities or those with limited mobility.

Policy BE3: Local Employment Sites and Work-Live																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	++	+	+	+	+	+	-	+	0	?	+	0	0	0	+	+	0	+	+	+	0	+
Impacts are predicted to be positive in relation to social objectives. Protecting employment sites in industrial use across the borough will ensure local employment opportunities. This can help reduce inequalities, and in turn help improve health and well-being. This policy option will result in increased housing, including affordable housing. Encouraging investment through new development can help improve the quality of an area. Mixed-use development creates footfall and overlooking in areas throughout the day and evening. This can help improve feelings of safety and reduce crime. SMEs are an important part of an areas character. Protecting and retaining these businesses can help foster a sense of place and pride. Where local employment sites are located in town centres intensification of use will help to increase the population of the centre and help to support its vitality and viability. Impacts against environmental impacts are mixed but overall predicted to be positive. Protecting local employment sites in industrial use ensures local employment opportunities are available, and can reduce the need to travel. Although increased intensification of use will increase the production of waste. Therefore, impacts are likely to be negative in relation to criteria E2. There is a risk in locating sensitive uses such as residential next to industrial employment of impacts on amenity, particularly from noise. Given that space will be designed to modern sound insulation standards and be air quality neutral impacts on environmental health can be mitigated. Impacts overall are therefore likely to be neutral. Modern development will enhance the quality of the public realm, townscape and will integrate sustainable urban drainage systems which can help to improve water quality. Through redevelopment a net increase in biodiversity and green infrastructure is sought, but whether this constitutes a benefit will be dependent on the existing site and the level of planting and biodiversity already present. Impacts on biodiversity are therefore dependant on the nature of the site. Where a local employment site contains a heritage asset this will be protected as appropriate by policies elsewhere in the plan, so the impacts are likely to be neutral. Whilst increased intensity of use can increase energy consumption, modern buildings are designed to higher sustainability standards. Meaning overall impacts are likely to be neutral.																								

Allowing more efficient use of land can help protect open space and greenfield sites from development pressure.

Impacts against economic impacts are predicted to be predominantly positive. In the short to medium term businesses may be displaced during development. Longer term this policy will have positive impacts by securing an increase in the amount of affordable workspace in the B use class (with makerspace prioritised to meet demand) as part of mixed-use developments which will help support business start-ups and create job opportunities. Work-Live development can also promote flexible working, which could be of particular benefit to those with caring responsibilities or disabled people with less mobility. This policy approach will help to attract investment to local employment sites. Mixed-use development and Work-Live development has the potential to reduce the need to travel, but only if those in the local community can benefit from employment opportunities.

It is considered that this policy will have a neutral impact on people who have the following protected characteristics: gender reassignment, marriage and civil partnership, age, religion and belief, pregnancy and maternity, sexual orientation. The policy could have particular positive impacts on the protected characteristics of sex, race and disability, as women and BAME groups have higher levels of unemployment and the policy will result in the creation and retention of local employment opportunities. Additionally, the policy could benefit disabled people with less mobility and those with caring responsibilities.

9. Submission Stage Site Allocation Assessments

9.1. A number of changes have been made to the proposed site allocations since the Publication Stage of consultation. An outline of these changes is below.

Potential Changes to Site Allocation Assessments due to Main Modifications

9.2 A number of main and minor modifications are proposed to the Local Plan following the publication stage of consultation. Noted below are where these proposed modifications have resulted in a change to the wording of the assessment of the site and / or its associated IIA. The respective updated site assessments can be found later in this chapter.

Site Name	Notes	Indicative Housing Capacity (Publication Stage)	Indicative Housing Capacity (Submission Stage)	Potential Impacts
BCSA4	Change in housing capacity	Up to 700	Up to 500	Site sill provides for 100+ homes, therefore there is still a significant positive impact (S3A)
BCSA6	Change in housing capacity	1000	830	Site sill provides for 100+ homes, therefore there is still a significant positive impact (S3A)
BCSA7	Change in housing capacity	400	475	Site sill provides for 100+ homes, therefore there is still a significant positive impact (S3A)
BCSA7	Clarification that development must re-provide Tfl ancilliary accommodation	No change	No change	No overall change in gain or loss of employment space so no change to ratings
BCSA9	Change in housing capacity	1200	1262	Site sill provides for 100+ homes, therefore there is still a significant positive impact (S3A)
BCSA9	Change in terminolofy from 'business' to 'industrial'	No change	No change	No overall change in gain or loss of employment space so no change to ratings
BCSA17	Change in housing capacity	60	0	Neutral impact now predicted due to no housing being proposed on the site (S3A)

BEGA1	Clarification that site comprises LSIS rather than SIL and LSIS	No change	No change	No overall change in gain or loss of employment space so no change to ratings
BEGA1	Change in terminology from 'employment' to 'industrial'	No change	No change	No overall change in gain or loss of employment space so no change to ratings
BEGA2	Change in terminology from 'employment' to 'industrial'	No change	No change	No overall change in gain or loss of employment space so no change to ratings
BESA2	Clarification regarding re-provision of floorspace	No change	No change	No overall change in gain or loss of employment space so no change to ratings
BNSA2	Clarification regarding the PTAL rating of the site	No change	No change	No change; still a neutral rating
BNSA2	Change in terminology from 'employment' to 'industrial'	No change	No change	No overall change in gain or loss of employment space so no change to ratings (S3A)
BSESA5	Change in housing capacity	120 (gross)	121 (gross) (loss of 171)	Minor negative due to loss of 171 homes (net loss of 50) (S3A)
BSESA8	Change in housing capacity	202 (gross)	250 (gross) (loss of 154)	Minor positive due to net gain of fewer than 100 homes (net gain of 96) (S3A)
BSESA11	Change in housing capacity	10	20	Still provides for between 10 – 99 homes, therefore there is still a minor positive impact (S3A)
BSESA12	Change in housing capacity	Unknown	-40	Minor negative due to loss of 40 dwellings (S3A)
BSESA22	Change in housing capacity	20	42	Still provides for between 10 – 99 homes, therefore there is still a minor positive impact (S3A)
BSESA25	Change in housing capacity	50	70	Still provides for between 10 – 99 homes, therefore there is still a minor positive impact (S3A)
BSESA34	Change in housing capacity	Unknown	20	Site still provides fewer than 100 homes so there is still a minor positive impact (S3A)
BSSA1	Change in housing capacity	380	414	Site still provides for 100+ homes, therefore there is still a significant positive impact (S3A)
BSSA4	Change in housing capacity	200	300	Site still provides for 100+ homes, therefore there is still a significant positive impact (S3A)
BSSA6	Change in housing capacity	540	569	Site still provides for 100+ homes, therefore there is still a significant positive impact (S3A)
BSSA6	Change from "modern replacement employment	No change	No change	No overall change in gain or loss of employment space so no change to ratings

	floorspace” to “affordable workspace will be sought”			
BSSA13	Change in housing capacity	15	26	Still provides for between 10 – 99 homes, therefore there is still a minor positive impact (S3A)
BSWSA1	Clarification regarding re-provision of floorspace	No change	No change	No overall change in gain or loss of employment space so no change to ratings
BSWSA5	Change in housing capacity	590	490	Site sill provides for 100+ homes, therefore there is still a significant positive impact (S3A)
BSWSA6	Change in housing capacity	135	147	Site sill provides for 100+ homes, therefore there is still a significant positive impact (S3A)
BSWSA6	Clarification that re-provision of industrial floorspace will be sought rather than flexible / affordable workspace	No change	No change	No overall change in gain or loss of employment space so no change to ratings
BSWSA7	Change in housing capacity	2900	2303	Site sill provides for 100+ homes, therefore there is still a significant positive impact (S3A)
BSWSA12	Change in housing capacity	24	22	Still provides for between 10 – 99 homes, therefore there is still a minor positive impact (S3A)
BSWSA15	Change in housing capacity	28	36	Still provides for between 10 – 99 homes, therefore there is still a minor positive impact (S3A)
BSWSA16	Change in housing capacity	80	120	Change from minor positive to significant positive, as now has an indicative capacity of over 100 homes (S3A)
BSWSA17	Change in housing capacity	150	170	Site sill provides for 100+ homes, therefore there is still a significant positive impact (S3A)

Proposed Change to Methodology for Assessing Flood Risk

9.3 As a statutory consultee, the Environment Agency was consulted at Submission and Publication stage. Comments were received back from the Environment Agency in relation to the methodology of assessing the flood risk. In line with national policy and the sequential test, a site wholly in Flood Zone 1 is to be prioritised for allocation over a site partially in Flood Zone 2. For this reason at submission stage it is proposed to amend the methodology for EN12a and EN12b in line with the EA's comments, and for consistency, for EN12c (surface water) to be amended to allow for sites at no risk of surface water flooding to be considered "minor negative" rather than "neutral". The updated methodology is below.

	Objective Outputs Assessment	Significant Positive ++	Minor Positive +	Neutral or Mixed +/- 0	Unknown Effects	Minor Negative -	Significant Negative --
Publication Stage methodology	EN12a: Flood Risk From Rivers.	NA	NA	All other sites	NA	Majority (>50%) within Flood Zone 2 or Smaller proportion (1-50%) within Flood Zone 3	Majority (>50%) within Flood Zone 3
Submission Stage methodology	EN12a: Flood Risk From Rivers.	NA	All of site within Flood Zone 1	Smaller proportion (1-50%) within Flood Zone 2	NA	Majority (>50%) within Flood Zone 2 or Smaller proportion (1-50%) within Flood Zone 3	Majority (>50%) within Flood Zone 3
Publication Stage methodology	EN12b: Flood Risk from Ground Water.	NA	NA	All other sites	NA	Majority (>50%) within 'moderate' groundwater flood risk area <u>or</u> smaller proportion (1-50%) within 'high' or 'very	Majority (>50%) within 'high' or 'very high' groundwater flood risk area

						high' groundwater flood risk area	
Submission Stage methodology	EN12b: Flood Risk from Ground Water.	NA	All of site is within a 'low' or no groundwater flood risk area	Smaller proportion (1-50%) within a 'moderate' groundwater flood risk area	NA	Majority (>50%) within 'moderate' groundwater flood risk area <u>or</u> smaller proportion (1-50%) within 'high' or 'very high' groundwater flood risk area	Majority (>50%) within 'high' or 'very high' groundwater flood risk area
Publication Stage methodology	EN12c: Flood Risk from Surface Water.	NA	NA	All other sites	NA	Smaller proportion (1-50%) within 1 in 100 year surface water flood risk area	Majority (>50%) within 1 in 100 year surface water flood risk area
Publication Stage methodology	EN12c: Flood Risk from Surface Water.	NA	None of the site is located within a 1 in 100 year surface water flood risk area (all other sites)	NA	NA	Smaller proportion (1-50%) within 1 in 100 year surface water flood risk area	Majority (>50%) within 1 in 100 year surface water flood risk area

9.4 Due to the change in methodology above it was necessary to re-assess the site allocations. A schedule of proposed changes is below. However, some of the ratings may also have changed due to clarification of site boundaries resulting in part of the site either no longer being in an area of flood risk or now being in an area of flood risk.

Proposed Changes to Flood Risk Ratings of Site Allocations

Site Allocation Reference	Publication Stage EN12a rating (river)	Submission Stage EN12a rating (river)	Publication Stage EN12b rating (groundwater)	Submission Stage EN12b rating (groundwater)	Publication Stage EN12c rating (surface water)	Submission Stage EN12c rating (surface water)
BCSA1	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BCSA2	Neutral	Neutral	Neutral	Minor Positive	Major Negative	Minor Negative
BCSA3	Major Negative	Major Negative	Neutral	Minor Positive	Major Negative	Major Negative
BCSA4	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Negative
BCSA5	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BCSA6	Major Negative	Minor Negative	Neutral	Minor Positive	Major Negative	Minor Negative
BCSA7	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BCSA8	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BCSA9	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BCSA10	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Positive
BCSA11	Minor Negative	Minor Negative	Neutral	Minor Positive	Major Negative	Major Negative
BCSA12	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BCSA13	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BCSA14	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BCSA15	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BCSA16	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BCSA17	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BCSA18	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Negative
BCSA19	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Positive
BEGA1	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BEGA2	Neutral	Neutral	Neutral	Neutral	Minor Negative	Minor Negative
BESA1	Minor Negative	Minor Negative	Neutral	Minor Negative	Neutral	Minor Positive
BESA2	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BESA3	Neutral	Minor Positive	Neutral	Minor Negative	Neutral	Minor Positive
BNSA1	Neutral	Minor Positive	Minor Negative	Minor Positive	Minor Negative	Minor Positive
BNSA2	Neutral	Minor Positive	Major Negative	Minor Positive	Minor Negative	Minor Positive

BNSA3	Neutral	Neutral	Minor Negative	Minor Positive	Minor Negative	Minor Negative
BNSA4	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BNSA5	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BNSA6	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BNSA7	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BNSA8	Neutral	Minor Positive	Neutral	Minor Positive	Major Negative	Major Negative
BNWSA1	Neutral	Minor Positive	Minor Negative	Minor Positive	Neutral	Minor Negative
BNWGA1	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BSSA1	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BSSA2	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BSSA3	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BSSA4	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BSSA5	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Positive
BSSA6	Major Negative	Major Negative	Neutral	Minor Negative	Major Negative	Minor Negative
BSSA7	Major Negative	Major Negative	Neutral	Minor Negative	Minor Negative	Minor Negative
BSSA8	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BSSA9	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BSSA10	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Negative
BSSA11	Neutral	Minor Positive	Neutral	Minor Negative	Minor Negative	Minor Negative
BSSA12	Neutral	Minor Positive	Neutral	Minor Negative	Neutral	Minor Positive
BSSA13	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BSSA14	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BSSA15	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BSSA16	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BSSA17	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BSSA18	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BSSA19	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BSESA1	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BSESA2	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BSESA3	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BSESA4	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BSESA5	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BSESA6	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BSESA7	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative

[illegible]

BSWSA7	Minor Negative	Minor Negative	Minor Negative	Minor Negative	Minor Negative	Minor Negative
BSWSA8	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BSWSA9	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BSWSA10	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BSWSA11	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BSWSA12	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Negative
BSWSA13	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BSWSA14	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BSWSA15	Neutral	Minor Positive	Neutral	Minor Negative	Neutral	Minor Negative
BSWSA16	Neutral	Minor Positive	Neutral	Minor Negative	Neutral	Minor Negative
BSWSA17	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive

Updated Site Allocation Assessments (Publication Stage)

Central

Site	Socio-economic								Environmental											
	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	EN11a	EN12a	EN12b	EN12c
ASDA Wembley (BCSA1)	++	+	++	++	++	++	++	0	++	0	0	-	0	?	0	0	+	+	+	-
Comments	The site is within a London Strategic Area for Regeneration and should contribute a significant uplift in residential units of approximately 940. The site is also within an area associated with high levels of crime and should therefore benefit from redevelopment. The site is well provisioned with infrastructure, including healthcare, schools, and parks and sporting facilities.								With a high PTAL the site benefits from the good public transport links afforded due to proximity to Wembley Park station. This should facilitate the delivery of a car free development, reducing associated traffic and air pollution in the area. The site is currently not in-keeping with local character and has large parking facilities, creating a poor environment. The site would therefore benefit from redevelopment in order to bring the design more in line with local character and reduce parking provision in order to decrease car dependency.											

Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with a good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Stadium Retail Park and Fountain Studios (BCSA2)	-	+	++	++	++	++	++	0	+	0	0	--	0	?	0	0	+	0	+	-
Comments	The site is not within a London Strategic Are for Regeneration. The site is within an area associated with high levels of crime and therefore will benefit from redevelopment. The site is well located and has good access to a range of essential infrastructure such as healthcare, schools, and sporting facilities.								With a high PTAL of 5-6a, the site benefits from its close proximity to Wembley Park station and should therefore aim to be car free, reducing associated traffic and pollution. The site has fairly significant surface water flooding concerns which should be addressed in any proposals and should be mitigated effectively with the incorporation of SUDS and green infrastructure.											
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with a good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			

Brook Avenue (BCSA3)	++	+	++	++	++	++	++	0	+	0	+	--	0	?	0	0	0	-	0	--
Comments	The site is within a London Strategic Area for Regeneration and should constitute a significant uplift in residential units with a potential site capacity of 350. The area also suffers high crime rates and will therefore benefit from redevelopment. The site is close to Wembley town centre and is therefore well catered for in regards to essential infrastructure, including healthcare, schooling and sporting facilities.								The site has a high PTAL rating being in close proximity to Wembley Park Station suggesting developments should aim to be car free. This should serve to reduce traffic and associated air pollution through reducing car dependency. The site backs onto the Wealdstone Brook and presents an opportunity to enhance the watercourse through redevelopment, ensuring proposals are compliant with the waterside development policy. The site has considerable flooding concerns, both fluvial and surface water, and will benefit from the incorporation of SUDS and soft landscaping to increase permeability and increase biodiversity.											
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with a good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. Development should enhance the setting of the adjacent watercourse by contributing to naturalisation, and mitigate the current concern over fluvial flooding. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Fifth Way/Euro Car Parts (BCSA4)	-	+	++	++	0	++	++	0	+	0	+	--	0	?	0	0	+	+	+	-
Comments	The site is not within a London Strategic Area for Regeneration nor within an area which experiences particularly high rates of crime. Being within close proximity to Wembley town centre the site has good access to a range of								The site has a good PTAL of 3 and 4 and should seek to minimise parking facilities in order to reduce driving tendencies, decreasing traffic and associated air pollution. The Wealdstone Brook runs along the northern edge of the site and is designated as a Grade II Site of Importance for Nature Conservation (SINC). Therefore, a reasonable buffer should be provided in order to reduce any											

	facilities, including healthcare, schooling, and sporting facilities.								potential negative impacts of flora and fauna. This also represents an opportunity to enhance the watercourse and where possible increase green infrastructure and its accessibility to the public.											
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with a good PTAL and good accessibility to a range of essential infrastructure. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. This development can contribute to enhancing the watercourse through naturalisation. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Olympic Office Centre (Network Homes) (BCSA5)	-	+	++	++	++	++	-	0	+	0	0	--	0	?	0	0	+	+	+	-
Comments	The site is not within a London Strategic Area for Regeneration and should provide the area with a potential housing uplift of 253 units. The area also experiences high levels of crime and will therefore benefit significantly from redevelopment. The site is within Wembley town centre and therefore has good access to facilities, including schooling which only scored negatively because the nearest primary school was slightly further than 500m away.								The site has a good PTAL level of 5, forecast to rise to 6a by 2031 which should allow for car free development, reducing associated traffic and air pollution. The site has very minor surface water flooding concerns which should be mitigated against preventing further problems.											
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with a good PTAL and good accessibility to a range of essential infrastructure. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. This will also serve to reduce concern over flooding by increasing permeability and incorporating other																			

	necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Watkin Road (BCSA6)	-	+	++	++	0	++	++	0	+	0	+	--	0	?	0	0	+	-	+	--
Comments	The site is not within a London Strategic Area for Regeneration, however, it is within an area associated with high crime rates and should benefit from redevelopment in this respect. The site is within close proximity to Wembley town centre which reflects the sites good access to a wide range of facilities, including healthcare, schools, and sports facilities.								The site has a PTAL of 4 which should facilitate car free development which will reduce any associated traffic and air pollution. The site backs onto the Wealdstone Brook which itself is a Grade II Site of Importance for Nature Conservation. This designation should not be undermined by redevelopment, with any proposals ensuring a sufficient buffer in accordance with the waterside development policy. Proposals should also seek to enhance the watercourse and its accessibility by the public. The site currently suffers significant flooding, with both fluvial and surface water which should be considered in any proposals, using the incorporation of SUDS and soft landscaping for mitigation purposes.											
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with a good PTAL and good accessibility to a range of essential infrastructure. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. This sustainable development can be centred around enhancement to the adjacent watercourse through naturalisation, in the process mitigating the current concern over fluvial flooding. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Wembley Park Station (BCSA7)	0	+	++	++	++	++	++	0	+	0	0	--	0	?	0	0	+	+	+	-

Comments	The site is within 100 meters of a London Strategic Area for Regeneration and should provide the area with an uplift in housing of approximately 300 dwellings. The site is also within an area associated with high levels of crime and redevelopment could therefore help improve feelings of safety. The site is adjacent to Wembley town centre and therefore has access to a wide range of essential facilities including healthcare, schools, and sporting facilities.								The site has a good PTAL of 4 and 5 which is set to increase to 5 and 6a come 2031 which should justify and promote a car free development, reducing associated traffic and air pollution. There are minor surface water flooding concerns on site which will be easily remedied through mitigation techniques such as the incorporation of SUDS and soft landscaping. The site currently consists of large parking facilities which create a poor environment and would benefit from redevelopment.											
	Development will include the re-provision of TFL ancillary accommodation.																			
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with a good PTAL and good accessibility to a range of essential infrastructure, helping direct investment near a London Strategic Regeneration Area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Wembley Park Drive (BCSA8)	0	+	++	++	++	++	++	0	+	0	0	--	0	?	0	0	+	+	+	-

Comments	The site is not within a London Strategic Area for Regeneration, however, it is within an area which is subject to high crime rates and will therefore benefit from redevelopment. The site forms part of Wembley town centre which reflects its high levels of access to essential infrastructure, including healthcare, schools, and sporting facilities. The site has potential for significant residential uplift in the region of 126 units.								The site benefits from immediate proximity to Wembley Park Station and therefore has a high PTAL of 6a. This should facilitate high density, car free development, reducing car dependence and its associated traffic and air pollution. The site is adjacent to the Wealdstone Brook and therefore represents an opportunity to enhance the watercourse by increasing its natural amenity to biodiversity and its accessibility for public enjoyment.											
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with a good PTAL and good accessibility to a range of essential infrastructure, helping direct investment near a London Strategic Regeneration Area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. This sustainable development can be centred around enhancements to the adjacent watercourse through naturalisation. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
First Way (BCSA9)	-	-	++	++	0	+	++	+	-	0	0	--	--	?	0	0	+	+	+	-
	The site is not within a London Strategic Area for Regeneration and is within an area subject to average levels of crime. The site is within 800m of Wembley Town Centre and within the Wembley Growth Area, meaning good levels of access to essential infrastructure including schools and sporting facilities. However, the site has poor access to healthcare facilities, being more than 800m from the nearest healthcare facility. The site has potential for significant residential development of 1200 dwellings.								The site has a low PTAL rating though stands to benefit from better connections to the high levels of surrounding development, and is within close walking distance to two railway stations. The site is within an Air Quality Management Area and should aim to be air quality positive due to being in the Wembley Growth Area. The site is not within a Conservation Area or Archaeological Priority Area and contains no heritage assets. The site was formerly Strategic Industrial Land and maximum re-provision of industrial uses at ground level should be undertaken as part of development.											

	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of a significant amount of housing within close proximity to a town centre, with good access to essential infrastructure facilities. Mixed effects are predicted against environmental criteria. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. The impermeable nature of the site currently does not provide good east-west links to the stadium, however, there is an opportunity to strengthen these links by creating new streets and pedestrian paths. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
York House (BCSA10)	-	+	++	n/a	++	++	++	+	++	0	0	--	0	+	0	0	+	+	+	+
The site is not within a London Strategic Area for Regeneration but is within an area subject to high of crime. The site is within Wembley Town Centre, reflecting its high levels of access to essential infrastructure including healthcare, schools and sporting facilities. The site is allocated for use as a primary school and office space.					The site benefits from a high PTAL rating of 5-6a, which should facilitate car free development, reducing car dependence and its associated traffic and air pollution. A small proportion of the site (1-50%) is within a 1 in 100-year surface water flood risk area which will need to be mitigated accordingly.															
Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of extra primary school facilities, which are required due to the expected population growth in the borough. The site contains a large carpark which is surplus to requirements. Mixed effects are predicted against environmental criteria. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. A small proportion of the site is within a 1 in 100-year surface water flood risk area therefore this will need to be investigated and addressed accordingly. In summary, the site is well suited to being allocated for this use, and negative impacts can be mitigated and wider sustainability benefits achieved.																				

College of North West London, Wembley (BCSA11)	-	+	++	++	++	++	++	0	++	0	+	--	0	+	-	0	+	-	+	--
	The site is not within a London Strategic Area for Regeneration but is within an area subject to high of crime. The site is within Wembley Park Town Centre, reflecting its high levels of access to essential infrastructure including healthcare, schools and sporting facilities. The site has potential for mixed-use residential-led development in the region of 155 dwellings.								The site benefits from immediate proximity to Wembley Park Station and has a high future PTAL rating of 6a. This should facilitate high density, car free development, reducing car dependence and its associated traffic and air pollution. The site is adjacent to the Wealdstone Brook and features a number of mature trees, and therefore represents an opportunity to enhance the watercourse by increasing its natural amenity to biodiversity and its accessibility for public enjoyment. The site falls almost entirely within Flood Zones 2 and 3 and a Flood Risk Assessment will be required as part of any development coming forward.											
	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with a good PTAL and good accessibility to a range of essential infrastructure, helping direct investment near a London Strategic Regeneration Area associated with high levels of crime. Mixed effects are predicted against environmental criteria. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. This sustainable development can be centred around enhancements to the adjacent watercourse through naturalisation, although flood risks will need to be investigated and mitigated accordingly. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Land to South of South Way (BCSA12)	-	-	++	++	0	+	++	0	-	0	0	--	--	?	0	0	+	+	+	-
	The site is not within a London Strategic Area for Regeneration and is within an area of average crime levels. The site is within 800m of Wembley Town Centre and is within the Wembley Growth Area, meaning good levels of access to essential infrastructure including								The site has a low PTAL rating though stands to benefit from better connections to the high levels of surrounding development, and is within close walking distance to two railway stations. The site is within an Air Quality Management Area and should aim to be air quality positive due to being in the Wembley Growth Area. The site is not within a Conservation Area or Archaeological Priority Area and											

	schools and sporting facilities. However, the site has poor access to healthcare facilities, being more than 800m from the nearest healthcare facility. The site has potential for residential-led mixed-use development encompassing 500 dwellings and business premises.							contains no heritage assets, however, it is adjacent to the SINC Grade I Chiltern Line and a wildlife corridor. The site was formerly Strategic Industrial Land and maximum re-provision of business uses at ground level should be undertaken as part of development. A small proportion of the site (1-50%) is within a 1 in 100-year surface water flood risk area which will need to be mitigated accordingly.												
	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of a significant amount of housing within close proximity to a town centre, with good access to essential infrastructure facilities. Mixed effects are predicted against environmental criteria. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. The location of the site next to a the SINC Grade I Chiltern Line and wildlife corridor means that development must take into consideration a positive contribution to biodiversity, improve access to nature and its recreational function, which are important contributing factors to health and wellbeing. Flood risks will need to be investigated and mitigated accordingly. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Former Malcolm House Site (BCSA13)	-	+	++	++	++	++	-	0	+	0	0	--	0	?	0	0	+	+	+	+
Comments	The site is not within a London Strategic Area for Regeneration but it is associated with high levels of crime. The site should provide a significant uplift in housing as well as additional floorspace for other purposes. The site is well located so as to be served by Wembley Park Town Centre and local employment sites, with healthcare within walking distance. The site is not within close proximity to a secondary school and therefore scored negatively against schooling.								The site has a strong PTAL of 5 being within close proximity to Wembley Park Station which should facilitate the implementation of a car free development, reducing associated traffic and air pollution, improving air quality for which the site scored negatively.											

Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of new housing in an area with good accessibility to a range of essential infrastructure, with the exception of schools, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. The site's good PTAL score means car dependency should not be increased by occupants. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. In summary, development will increase intensity of use and potential negative impacts can be mitigated and wider sustainability benefits achieved.																				
St Joseph's Social Club, Empire Way (BCSA14)	-	+	++	+	++	++	++	0	+	0	0	--	0	+	0	0	+	+	+	+	
Comments	The site is not within a London Strategic Area for Regeneration but it is associated with high levels of crime. The site should provide a significant uplift in housing. The site is well located so as to be served by Wembley Town Centres and local employment sites, with healthcare and schooling within walking distance. Redevelopment of this site will incur the loss of a community centre. It is therefore important to retain any D1 floorspace, with redevelopment ensuring there is no net loss,								The site has a strong PTAL of 5 being within close proximity to Wembley Park Station which should facilitate the implementation of a car free development, reducing associated traffic and air pollution, improving air quality for which the site scored negatively.												
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of new housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. The site's good PTAL score means car dependency should not be increased by occupants. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. In summary, development will increase intensity of use and potential negative impacts can be mitigated and wider sustainability benefits achieved.																				

Site W10 Wembley Masterplan (BCSA15)	-	+	++	N/A	++	++	++	+	0	0	0	--	-	+	0	0	+	+	+	+
	The site is not within a London Strategic Area for Regeneration but it is associated with high levels of crime. The site is well located so as to be served by Wembley Town Centres and local employment sites, with healthcare and schooling within walking distance. Redevelopment of this site should consist of retail at ground floor and B1 office or D2 entertainment at upper floors.								The site has a low PTAL rating though stands to benefit from better connections to the high levels of surrounding development, and is within close walking distance to two railway stations. The site is within an Air Quality Management Area and should aim to be air quality positive due to being in the Wembley Growth Area. The site is not within a Conservation Area or Archaeological Priority Area and contains no heritage assets.											
	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of employment space, with Brent being a “provide capacity” borough, and the positive social impacts which are associated with this. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. In summary, the site is well suited to being allocated for this use, and negative impacts can be mitigated and wider sustainability benefits achieved.																			
Site NW04 Wembley Masterplan (BCSA16)	-	+	++	N/A	++	++	-	+	+	0	0	--	0	+	0	0	0	+	+	-
	The site is not within a London Strategic Area for Regeneration but is within an area of high crime levels. The site is within Wembley Town Centre and has good levels of access to essential infrastructure, including healthcare								The site benefits from a high PTAL rating of 5, which should facilitate car free development, reducing car dependence and its associated traffic and air pollution. The site is within an Air Quality Management Area and should aim to be air quality positive due to being in the											

	facilities and sporting facilities. The site has poor access to schools, however, the site is allocated for employment use of the consisting of A1-A5, D1, B1/C1/D2 use classes.								Wembley Growth Area. The site is not within a Conservation Area or Archaeological Priority Area and contains no heritage assets.											
	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of employment space, with Brent being a “provide capacity” borough, and the positive social impacts which are associated with this. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. In summary, the site is well suited to being allocated for this use, and negative impacts can be mitigated and wider sustainability benefits achieved.																			
Southway Motors/Fourway Supplies/Midnight Motors, South Way, HA9 0HB (BCSA17)	-	-	++	0	0	++	++	0	--	0	0	--	--	?	0	0	+	+	+	+
Comments	This site is not within a London Strategic Area for Regeneration, neither is it in an area which experiences high levels of crime. The site is well provisioned by key services being within close proximity to Wembley Park Town Centre, including schooling, however, the site has scored negatively against healthcare with the nearest facility being over 800 meters away. The site is within an Industrial Business Park, therefore any lost employment floorspace will need to be replaced through redevelopment.								The site has a low PTAL of 1b and will therefore require the provision of parking facilities which will increase vehicle dependence and associated traffic and air pollution, reducing air quality for which the site already scores negatively, and should aim to be air quality neutral.											
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of new housing in an area with good accessibility to a range of essential infrastructure, with the exception of healthcare. Mixed																			

	effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). This problem is exacerbated by the sites relatively low PTAL which is anticipated to increase vehicle dependence and associated traffic and pollution as it will likely require parking facilities. The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. In summary, development will increase intensity of use and potential negative impacts can be mitigated and wider sustainability benefits achieved.																			
Site W12 Wembley Park Boulevard, Wembley (BCSA18)	-	+	++	N/A	++	++	++	0	0	0	0	--	-	+	0	0	0	+	+	-
Comments	This site is not within a London Strategic Area for Regeneration, but is within an area which experiences high levels of crime. The site is within Wembley Town Centre, and benefits from close proximity to key services including schooling, healthcare and sporting facilities. The site, however, is allocated for employment uses consisting of A1-A4/B1/D1 and D2 uses.										The site has a medium PTAL rating. The site is within an Air Quality Management Area and should aim to be air quality positive. The site is not within a Conservation Area or Archaeological Priority Area and contains no heritage assets.									
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of employment space, with Brent being a “provide capacity” borough, and the positive social impacts which are associated with this. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an AQMA. The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. In summary, the site is well suited to being allocated for this use, and negative impacts can be mitigated and wider sustainability benefits achieved.																			
Wembley Park Station, Police Station and	+	+	++	+	++	++	++	?	++	0	0	--	0	+	0	0	0	+	+	+

Adjacent Land Bridge Road (BCSA19)		
Comments	The site is within a London Strategic Area for Regeneration, and is within an area which experiences high levels of crime. The site is adjacent to Wembley Park Town Centre, and benefits from close proximity to schooling, open space, and healthcare facilities. The site is allocated for residential development of approximately 60 dwellings, plus re-provision of the police station.	The site has a very high PTAL rating, which should facilitate car free residential development, reducing car dependence and its associated traffic and air pollution. The site is within an AQMA and should aim to be air quality positive due to being in the Wembley Growth Area. The site is not within a Conservation Area or Archaeological Priority Area and contains no heritage assets.
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of approximately 60 new dwellings, plus re-provision of the police station, within a town centre and with good access to essential infrastructure facilities. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an AQMA. The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. In summary, the site is well suited to being allocated for this use, and negative impacts can be mitigated and wider sustainability benefits achieved.	

East

	Socio-economic								Environmental											
Site	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	EN11a	EN12a	EN12b	EN12c
Neasden Station Growth Area (BEGA1)	++	+	++	++	++	++	+	0	+	0	0	-	0	?	0	0	+	+	+	-
Comments	The site is within a London Strategic Area for Regeneration. A significant part of the site comprises Locally Significant Industrial Sites. This being said, due to the size of the site and its potential for mixed development, it is possible it can accommodate a significant amount of residential development. The site is well located and has good access to key facilities including healthcare, schooling, and sporting facilities. Improvements to cycling and pedestrian links across the A5 and North Circular Road could particularly positively impact disabled people and those pregnant or on maternity. Regeneration will include the re-provision of industrial opportunities with plans to make the site more relevant to current workspace needs.								The site is well located, with PTALs ranging from 3-6a being within close proximity to Neasden Station with possibilities to benefit from the introduction of an additional station on the West London Orbital line. This will allow for the majority of developments within the site to be car free, reducing associated traffic and air pollution. This will be of particular importance on this site due to the potential for a significant uplift in dwellings. Being of mixed use, this site is set to include employment opportunities, helping further reduce the requirement of residents to commute long distances, relieving public transport and road networks. The site has some surface water flooding concerns which should be mitigated against using a sequential approach to development, ensuring flooding potential does not increase unacceptably.											
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration which is associated with high crime rates. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an																			

	AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Staples Corner SIL (BEGA2)	0	+	++	+	++	-	++	0	-	0	+	--	--	?	0	0	+	0	0	-
Comments	The site is within 100 metres of a London Strategic Area for Regeneration. The site is also within an area associated with high crime rates and would therefore benefit from redevelopment. The site is not close to a Brent town centre, however, the site is on the edge of the borough and next to Brent Cross shopping centre and should therefore be serviced by this. The same can be said of schools as it is likely that residents in this area will make use of schools in the neighbouring borough of Barnet. Regeneration would be required to provide industrial floorspace at a higher density. Residential development could help subsidise the creation of new industrial floorspace adapted for future needs.								The site has a low PTAL of 2 and 3 which is not set to change to 2031, however, this has not taken into consideration the potential for a West London Orbital link in the area. The low PTAL will likely serve to increase car dependence, increasing associated traffic and air pollution. As the site is transformational and of significant size, in addition to the neighbouring Brent Cross Opportunity Area of Barnet, it may be possible to improve transport infrastructure with additional buses etc. This is particularly important due to the size of the site, the sites designation as a Strategic Industrial Location, the traffic which already exists on the associated road networks and the location of the site within an Air Quality Management Area. The site also provides the opportunity to better enhance the Brent reservoir and increase its integration within the wider public consciousness.											
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward an area which is associated with high levels of crime. The site is not within close proximity to a Town Centre area, however, it is located near the borough boundary and will be served by Brent Cross shopping centre in Barnet. Given the scale of the site there is an opportunity for new services and social infrastructure to be provided as part of any development. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. This problem is exacerbated by the sites relatively low PTAL which is anticipated to increase vehicle dependence and associated traffic and pollution as it will likely require parking facilities.																			

	New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. This sustainable development can be centred around integration with the reservoir with redevelopment looking to enhance this asset. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Coombe Road (BESA1)	++	+	++	++	++	++	+	0	0	0	+	--	-	?	0	0	+	-	-	+
Comments	The site is within a London Strategic Area for Regeneration with a capacity of 194 dwellings. The site is also associated with high levels of crime and will therefore benefit from redevelopment. The site has good access to a range of essential infrastructure, including healthcare, schooling and, sports facilities.								This site currently has a PTAL of 3 which is expected to increase to a minimum of 4 with the introduction of the West London Orbital. This site is therefore appropriate for car free development. This site is also adjacent to the River Brent and the Brent Canal Feeder and therefore poses the opportunity to enhance the watercourses amenity for both residents and biodiversity. Due to this close proximity to watercourses, the site has some fluvial flooding concerns which proposals should take into consideration.											
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. This problem is exacerbated by the sites relatively low PTAL which is anticipated to increase vehicle dependence and associated traffic and pollution as it will likely require parking facilities. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. This should mitigate current concern over fluvial flooding and contribute to naturalisation of the adjoining watercourses. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			

Edgware Road Bus Depot (BESA2)	0	+	++	++	0	++	+	0	0	0	0	--	-	?	0	0	+	+	+	-
Comments	The site is close to a London Strategic Area for Regeneration. The site is well provided for in terms of infrastructure, including healthcare, schools, sporting facilities and open space. The site is a Locally Significant Industrial Site and will therefore require an operational bus garage of equivalent capacity to be retained / re-provided, unless TFL confirms that the garage is no longer operationall required or a suitable replacement can be found elsewherePolicy BT4 would ensure consideration around pedestrian and cycle safety if the bus depot is re-provided.								The site has a PTAL primarily of 3 and will therefore likely require parking infrastructure, encouraging car dependence and increasing associated traffic and pollution. The redevelopment of this site will also include the loss of a bus depot which may harm public transport services and should therefore be replaced on site if viable. The site has mild flooding concerns which should easily be mitigated with sufficient soft landscaping.											
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good accessibility to a range of essential infrastructure. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. This problem is exacerbated by the sites relatively low PTAL which is anticipated to increase vehicle dependence and associated traffic and pollution as it will likely require parking facilities. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Gower House 5 Blackbird Hill (BESA3)	+	+	+	+	++	0	+	+	0	0	0	--	-	+	0	0	++	+	-	+

Comments	The site is within a London Strategic Area for Regeneration with a capacity of 30 dwellings. The site has good access to a range of essential infrastructure, including healthcare, schooling, local shops/services, open space and sports facilities. Redevelopment of the site will need to provide for D1 community uses which will be lost by the demolition of the private school/ nursery which occurred on the site.	This site currently has a PTAL of 3 but sits on a public transport corridor with the potential for improvement as it sits between two growth areas. It is in an AQMA and due to PTAL level will result in some traffic generation. Its redevelopment will bring into use a vacant site that has recently had a building demolished on it. The hilltop position means flooding potential is limited from all sources.
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of new housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. This problem is exacerbated by the sites relatively low PTAL which is anticipated to increase vehicle dependence and associated traffic and pollution as it will likely require parking facilities. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. In summary, development will bring a vacant/ derelict site into use and potential negative impacts can be mitigated and wider sustainability benefits achieved.	

North

Site	Socio-economic								Environmental											
	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	EN11a	EN12a	EN12b	EN12c
Capitol Way Valley (BNSA1)	-	+	++	++	0	++	++	0	-	0	0	-	-	?	0	0	+	+	+	+
Comments	The site is not within a London Strategic Area for Regeneration; however, it is proposed to be an extension to an existing Growth Area which has been previously identified as being a sustainable location to accommodate significant growth. The								The site has a low PTAL and is likely to require parking facilities for residents, increasing associated traffic and pollution. Redevelopment should significantly enhance the site, bringing it forward for mixed use development, enhancing the public domain and increasing the value and connectedness of existing non-											

	site is located within an area which is not subject to particularly high crime rates. The area is well catered for in terms of essential infrastructure including healthcare, schooling, and sports/open space. A large portion of the site is designated as Locally Significant Industrial Land and although will be developed as mixed use, including residential, the site should maintain and enhance existing floorspace. The frontage facing Edgware road will also require activating commercially, acting to join up the town existing town centres.							designated green space and Grove Park. Increased green infrastructure will be essential in mitigating potential surface water flooding, as will the incorporation of SUDS. The groundwater flooding will need to be investigated and mitigated accordingly.												
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with good accessibility to a range of essential infrastructure. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). This problem is exacerbated by the sites relatively low PTAL which is anticipated to increase vehicle dependence and associated traffic and pollution as it will likely require parking facilities. The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In addition to this the site also suffers from groundwater flooding which will need to be investigated and addressed accordingly. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Colindale Retail Park, Multi-Storey Car Park and Southon House (BNSA2)	-	+	++	++	0	++	-	0	0	0	0	--	-	?	0	0	+	+	+	+

Comments	The site is not within a London Strategic Area for Regeneration, however it is located within the boundaries of the Burnt Oak and Colindale Growth Area which was previously identified by the Council as being a sustainable location to accommodate significant growth. The site is within an area which is not subject to particularly high levels of crime. The area is well accounted for in terms of essential infrastructure with the exception of schools. The site is close to the borough boundary and may be served by facilities which are in the neighbouring borough of Barnet. The site currently consists of a mix of uses which redevelopment is set to mimic, enhancing commercial and industrial floorspace. The frontage facing Edgware road will require activating, acting to join up the existing town centres.	The PTAL rating of the site varies from 2-4 and is likely to require parking facilities for residents, increasing associated traffic and pollution. Redevelopment should significantly enhance the site, bringing it forward for mixed use development, enhancing the public domain and increasing its permeability for pedestrian access. Increased green infrastructure will be essential in mitigating potential surface water flooding, as will the incorporation of SUDS. The groundwater/sewage flooding will need to be investigated and mitigated accordingly.
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with good accessibility to a range of essential infrastructure. The site is not within close proximity to schools, however, due to its proximity to the borough boundary it may be served by facilities in the neighbouring borough. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). This problem is exacerbated by the site's relatively low PTAL which is anticipated to increase vehicle dependence and associated traffic and pollution as it will likely require parking facilities. The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In addition to this the site also suffers from groundwater flooding which will need to be investigated and addressed accordingly. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.	

Queensbury LSIS and Morrisons (BNSA3)	-	+	++	++	++	++	++	0	0	0	0	--	-	?	0	0	+	0	+	-
Comments	This site is not within a London Strategic Area for Regeneration, however, it is within an area associated with high levels of crime. The significant redevelopment which could come forward with this site allocation will help improve the public domain and reduce crime rates. The site is well served by local goods and services being within walking distance to Kingsbury Town Centre and essential infrastructure including healthcare and schools. The site currently contains a large supermarket which should be retained under redevelopment helping cater for the wider area. The site contains two Locally Significant Industrial Sites which will look to be intensified during redevelopment, ensuring there is no overall net loss in LSIS floorspace.								The site has a relatively low PTAL and therefore may require the provision of parking facilities, potentially increasing vehicle dependence and associated traffic and pollution, reducing air quality for which the site scored negatively. The site is bound to the east by a wildlife corridor. Development should not reduce the ecological value of this site but enhance it through the provision of additional green infrastructure, improving its integration with surrounding greenspace. The site has concerns over both groundwater and surface water flooding which will need to be addressed prior to development, implementing any necessary mitigation techniques.											
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good accessibility to a range of essential infrastructure in which is associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). This problem is exacerbated by the sites relatively low PTAL which is anticipated to increase vehicle dependence and associated traffic and pollution as it will likely require parking facilities. The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary measures of mitigation such as SUDS. In addition to this the																			

	site also suffers from groundwater flooding which will need to be investigated and addressed accordingly. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Former Mecca Bingo Site (BNSA4)	-	-	++	+	++	++	-	0	+	0	0	--	0	+	0	?	++	+	+	+
Comments	This site is not within a London Strategic Area for Regeneration, however, it is within an area associated with high levels of crime. The site has good access to a range of goods and services by virtue of its proximity of its position within Burnt Oak Town Centre. The site has scored negatively against proximity to both schools and healthcare, however, the site is located on the borough boundary and may be served by facilities in the neighbouring boroughs.								The site has a good PTAL which should help facilitate the implementation of a car free development, helping to encourage more sustainable modes of transport, reducing associated traffic and air pollution, improving air quality for which the site has scored negatively. The site is currently unused and will benefit greatly from redevelopment. This is particularly important as the building is Grade II listed and is a 'Building at Risk' contained on Historic England's Heritage at Risk Register. Redevelopment should therefore seek to enhance this asset, being sure as not to impact upon its character.											
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with good accessibility to a range of essential infrastructure. The site is not within close proximity to either schools or healthcare facilities, however, due to its proximity to the borough boundary it may be served by facilities in the neighbouring borough. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. The listed building on site will benefit greatly from redevelopment as it is currently out of action, helping rejuvenate this heritage asset and incorporating its character back into the local image. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Former Kingsbury Library and Community Centre (BNSA5)	-	+	++	+	++	++	++	0	-	0	0	0	--	+	0	0	+	+	+	+

Comments	The site is not within a London Strategic Area for Regeneration, however, the area does experience high levels of crime. The site is well served by local facilities, being positioned within equidistance of three town centres with nearby strategic employment areas. Healthcare and schooling are within close proximity to the site, with Roe Green Park adjacent to the rear for open space.								The site has a low PTAL of 2 and may therefore require the provision of parking facilities which will increase vehicle dependence and associated traffic and pollution. The site is not within an air quality management area, however, development should still seek to be air quality neutral, maintaining one of the few areas with good air quality within the borough.											
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of new housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. Development should seek to at least be air quality neutral, minimising the impacts associated with the predicted increase in vehicular usage. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. In summary, development will increase intensity of use and potential negative impacts can be mitigated and wider sustainability benefits achieved.																			
Ex-Volkswagen Garage (BNSA6)	-	+	+	+	++	++	-	0	-	0	0	--	--	?	0	0	+	+	+	+
Comments	The site is within a London Strategic Area for Regeneration which experiences high crime rates. Well provided for by essential goods and services being within close proximity to Colindale Town Centre. The site has scored negatively against schooling, being more than 500 metres from a primary school, however, the site is on the								The site has a low PTAL of 2 and will therefore require the provision of parking facilities which will increase vehicle dependence and associated traffic and air pollution, reducing air quality for which the site already scores negatively, and should aim to be air quality neutral.											

	borough boundary and may be served by facilities in the neighbouring borough.																			
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of new housing in an area with good accessibility to a range of essential infrastructure, with the exception of schooling, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). This problem is exacerbated by the sites relatively low PTAL which is anticipated to increase vehicle dependence and associated traffic and pollution as it will likely require parking facilities. The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. In summary, development will increase intensity of use and potential negative impacts can be mitigated and wider sustainability benefits achieved.																			
Kingsbury Trade Centre (BNSA7)	-	+	++	0	++	++	+	0	-	0	0	--	--	?	0	?	+	+	+	+
Comments	The site is not within a London Strategic Area for Regeneration, however, it is subject to high crime rates. The site is well served with goods and services being within walking distance to Kingsbury Town Centre and within close proximity to healthcare and schooling. Redevelopment of the site must include the reprovision of existing commercial floorspace, ensuring no net loss.								The site has a low PTAL of 2 and will therefore require the provision of parking facilities which will increase vehicle dependence and associated traffic and air pollution, reducing air quality for which the site already scores negatively, and should aim to be air quality neutral. The site is within a Site of Archaeological Importance. Redevelopment should therefore be sympathetic to this asset, undertaking any necessary preparatory works prior to construction or demolition.											

Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of new housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). This problem is exacerbated by the sites relatively low PTAL which is anticipated to increase vehicle dependence and associated traffic and pollution as it will likely require parking facilities. The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. The site is within a Site of Archaeological Importance. Development should therefore take this into consideration, taking the necessary precautions prior to development in order to protect the value of this asset. In summary, development will increase intensity of use and potential negative impacts can be mitigated and wider sustainability benefits achieved.																				
Queensbury Underground Station Carpark (BNSA8)	-	-	+	+	++	+	-	0	0	0	0	-	0	+	0	0	+	+	+	--	
Comments	The site is not within a London Strategic Area for Regeneration, however, it is in an area associated with high levels of crime. The site has good access to open space, but has scored poorly in relation to schooling and healthcare. However, the site is located on the borough boundary, and may be served by facilities in the neighbouring boroughs. The site is allocated for residential development of approximately 36 dwellings and re-provision of the car park.								The site has an average / medium PTAL rating, however, the site is adjacent to Queensbury tube station which should help facilitate the implementation of a car free development, helping to encourage more sustainable modes of transport, reducing associated traffic and air pollution, improving air quality. The majority of the site (more than 50%) is within a 1 in 100-year surface water flood risk area, which means that mitigations will need to be put in place in relation to this.												
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with good accessibility to a range of essential infrastructure. The site is not within close proximity to either schools or healthcare facilities, however, due to its proximity to the borough boundary it may be served by facilities in the neighbouring borough. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site is not within an AQMA, but is within 50m of a railway line. However, the majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to																				

	modern sustainability standards which reduces energy usage and emissions. More than 50% of the site is within a 1 in 100-year surface water flood area, therefore, mitigations will need to be put in place regarding this. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.

North West

	Socio-economic								Environmental											
Site	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	EN11a	EN12a	EN12b	EN12c
Kenton Road Sainsbury's (BNWSA1)	-	+	++	++	0	++	-	0	+	0	0	-	0	?	0	0	+	+	+	-
Comments	The site is not within a London Strategic Area for Regeneration and neither is it susceptible to high levels of crime. Redevelopment will therefore not go toward benefitting the most deprived within the borough. The site is within Kenton town centre and therefore has access to a wide range of facilities including healthcare and sports/open space. Although the site is close to a secondary school, the nearest primary school is over 1000m away, however, the site is on the edge of the borough and may be served by facilities in the neighbouring borough of Harrow.								The site has a high PTAL of both 4 and 5 and should therefore aim for the residential element to be a car free development, reducing any associated traffic and pollution. The site is adjacent to railway tracks which are a designated wildlife corridor and therefore represents an opportunity to enhance the green infrastructure on site, with attempts to integrate into this existing nature reserve. The site is only partially in an Air Quality Management Area and in close proximity to the A4006. The site is also susceptible to sewer and groundwater flooding which should be addressed early on in the planning stage.											

	The site is currently occupied by a Sainsbury's and represents Kenton Town Centre Primary Shopping Frontage. Redevelopment should therefore retain the commercial/employment floorspace, enhancing it if possible.																			
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with a good PTAL and good accessibility to a range of essential infrastructure. The site is not within close proximity to schools, however, due to its proximity to the borough boundary it may be served by facilities in the neighbouring borough. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. The site has groundwater flooding concerns which should be investigated and mitigated accordingly. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Northwick Park Hospital (BNWGA1)	-	+	++	++	0	++	++	0	+	0	0	-	0	?	-	0	+	+	+	-
Comments	The site is not within a London Strategic Area for Regeneration and neither is it susceptible to high levels of crime. Redevelopment will therefore not go towards benefitting the most deprived within the borough. The site is well provisioned in terms of essential infrastructure, with an on-site hospital and neighbouring Northwick park for open space and sports. There is a primary								As a site of over 30 hectares in size, the site experiences a wide range of PTALs with the majority of land designated 3, 4 and 5. This will hopefully facilitate the development of very low levels of parking. This will be particularly important as the local road network already experiences congestion and will require extensive alterations should this site bring forward a significant uplift in dwellings. Access to Northwick Park Tube Station will require improvements to facilitate more inclusive access as well as increased capacity. These measures											

	school within close proximity south of the site. The site will be of mixed use development and should help provide a significant residential uplift, but also provide some employment floorspace, with the potential for specialised fields of work to be included.	should aggregate to help reduce car dependence on site, reducing any associated traffic and pollution. The development includes plans to relocate the sports pavilion on Metropolitan Open Land (MOL). The impact of this decision will need to be considered thoroughly, ensuring re-provision greenspace so that there is no net loss of MOL.
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with a good PTAL and good accessibility to a range of essential infrastructure. The site is not within close proximity to schools, however, due to its proximity to the borough boundary it may be served by facilities in the neighbouring borough. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. Part of the site represents protected open space which if redeveloped, will require re-provision ensuring no net loss and general enhancement. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.	

South

	Socio-economic								Environmental											
Site	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	EN11a	EN12a	EN12b	EN12c
Asiatic Carpets (BSSA1)	++	+	++	++	++	++	+	0	0	0	0	-	-	?	0	0	+	+	+	-
Comments	The site is situated in a London Strategic Area for Regeneration and will achieve an uplift of approximately 220 dwellings to the local area. This provides an opportunity to introduce affordable housing and investment within a more deprived area. The site has a relatively high PTAL of both 3 and 4, and is well serviced by local goods and services as well as key infrastructure such as healthcare and schools. The west section of this site is a Locally Significant Industrial Site which redevelopment will look to enhance and increase the overall employment floorspace.								The site has a PTAL of both 3/ 4 making it appropriate for car free development. It is expected to have a neutral impact on air quality. As with most of Brent the site is within an Air Quality Management Area. The site has some flooding concerns which should be addressed at the planning stage. Development will be required to reduce flood risk.											
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. This problem is exacerbated by the sites relatively low PTAL which is anticipated to increase vehicle dependence and associated traffic and pollution as it will likely require parking facilities. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. This will also serve to reduce concern over flooding by increasing permeability and																			

	incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
B&M & Cobbold Industrial Estate (BSSA2)	++	+	++	++	++	++	++	0	-	0	0	--	--	?	0	0	+	+	+	-
Comments	The site is a London Strategic Area for Regeneration and will achieve an uplift of approximately 160 dwellings to the local area. The area is also associated with high crime rates and will benefit greatly from investment and the addition of affordable housing. The site is well serviced by local goods and services, including key infrastructure such as healthcare and schools. The site is a Locally Significant Industrial Site which redevelopment will enhance and increase net employment floorspace.								The site has a low PTAL, primarily of 2, which will mean the likely requirement of parking provision. Redevelopment should still aim to be air quality neutral as the site is within an Air Quality Management Area (AQMA). The site has some flooding concerns which should be addressed at the planning stage. Development will be required to reduce flood risk.											
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an AQMA. The majority of the borough is within an AQMA. This problem is exacerbated by the sites relatively low PTAL which is anticipated to increase vehicle dependence and associated traffic and pollution as it will likely require parking facilities. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. Contributions to improvements to the bus network may be required to increase PTAL. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			

Church End Local Centre (BSSA3)	+	+	++	++	++	++	+	0	0	0	0	--	-	+	0	?	+	+	+	-
	The site is within a London Strategic Area for Regeneration and experiences high levels of crime and will therefore benefit greatly from redevelopment. The site is also well provisioned in terms of goods and services, including essential infrastructure such as healthcare and schooling. The site is allocated for commercial use, a new market, and housing (indicative capacity 195 dwellings)								The site has a PTAL rating of 2/3. However, this could increase on implementation of the West London Orbital. Redevelopment should still aim to be air quality positive as the site is within an Air Quality Management Area (AQMA). Church Road and Eric Road are within Flood Zone 3a due to surface water flooding. Development will be required to reduce flood risk. The site also includes a Grade II listed building and locally listed buildings, and is within an Archaeological Priority Area and partly within a Site of Archaeological Importance.											
	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an AQMA. The majority of the borough is within an AQMA. This problem is exacerbated by the site's relatively low PTAL, however, this should improve upon implementation of the West London Orbital. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. Development will be required to take into account flood risk issues and mitigation put in place with regards to this. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Chapman's & Sapcote Trading Estate (BSSA4)	0	+	++	++	++	++	+	0	+	0	0	--	0	?	0	0	+	+	+	-
Comments	The site is within close proximity to a London Strategic Area for Regeneration and will achieve an uplift of approximately 300 dwellings to the local area. The area is associated with high crime rates and will								With a high PTAL of 4 and 5, redevelopment of this site should aim to be car free, having a neutral impact on air quality as the site is within an Air Quality Management Area (AQMA). The site has some flooding concerns which should be addressed at the											

	benefit greatly from investment and the addition of affordable housing. The site has a strong PTAL of both 4 and 5, and is well serviced by local goods and services, including key infrastructure such as healthcare and schools. The site is a Locally Significant Industrial Site which redevelopment will enhance and increase net employment floorspace.	planning stage. Development will be required to reduce flood risk.
Willesden Bus Depot (BSSA5)	- + + ++ ++ ++ + 0	+ 0 0 -- 0 ? 0 0 + + + +
Comments	Not within or sufficiently close to help benefit London Strategic Areas for Regeneration. The site is well provisioned in terms of facilities, reflecting its position between Church End town centre and Willesden Green town centre. The site is fairly large and well situated with a high PTAL, providing an opportunity to develop approximately 150 dwellings depending on the density of the development.	The site has a high PTAL meaning development would be car free. The associated reduction in car usage will reduce traffic and have air quality benefits in this Air Quality Management Area (AQMA). The site has some flooding concerns which should be addressed at the planning stage. Development will be required to reduce flood risk.
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an AQMA. The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.	

Argenta House and Wembley Point (BSSA6)	0	+	++	+	+	-	-	0	+	0	+	--	0	+	0	0	+	--	-	-
Comments	The site is within 100 metres of a London Strategic Area for Regeneration and is in close proximity to essential services such as healthcare, open space and sports facilities. The site is not within close proximity to a town centre or secondary schools. This site will constitute a temporary loss of employment floorspace during construction. However, affordable workspace will be sought on site associated with a new mixed use community.								The site has a high PTAL of 4 meaning development should aim to be car free. Wembley Brook passes through a culvert on the site and development represents an opportunity to enhance this watercourse through naturalisation. The site is within an Air Quality Management Area with the primary sources of pollution coming from the North Circular road and Harrow Road. The site currently has significant flood risk potential, both fluvial and surface water, being in close proximity to Wembley Brook and the River Brent.											
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good PTAL and close proximity to healthcare, open space and sports facilities, helping direct investment toward aa area associated with high crime rates. The site has scored negatively with regards to its proximity to a local town centre and schooling facilities. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. Concerns over fluvial flooding may be mitigated through the better management of the watercourse which passes through the site. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Bridge Park & Unisys Building (BSSA7)	++	+	++	++	++	-	+	0	0	0	0	--	-	?	0	0	+	--	-	-

Comments	The site is situated within a London Strategic Area for Regeneration. It should be possible for the site to bring forward approximately 500 residential units due to the sites location and general character of the area. The site is more than 800 metres from a town centre, however, there are facilities within close proximity along Harrow road. The area will benefit greatly from investment which could help reduce crime and relative poverty within the area. The site currently includes a leisure centre which will need be replaced with a more modern facility improving access to community facilities within the site and surrounding area.								Although the site is in close proximity to Stonebridge Park Station it is obstructed by the north circular road which means the site has a relatively low PTAL and may require parking facilities. The site is within an Air Quality Management Area (AQMA) with sources of immediate pollution arising from the North Circular road and Harrow road. The site currently has significant flooding concerns, both fluvial and tidal, and surface water. This is due to the sites proximity to the River Brent and its tributary Wembley Brook with exacerbation from the areas general low permeability. It is imperative that redevelopment of the site introducing sufficient mitigation measures to reduce the risk of flooding.											
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good PTAL and close proximity to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration associated with high crime rates. Although the site is well catered for in terms of infrastructure, it is not within close proximity to a town centre and scores negatively because of this. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an AQMA. The majority of the borough is within an AQMA. This problem is exacerbated by the sites relatively low PTAL which is anticipated to increase vehicle dependence and associated traffic and pollution as it will likely require parking facilities. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. Concerns over fluvial flooding may be mitigated through the better management of the watercourse which passes through the site. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
McGovern's Yard (BSSA8)	-	+	+	+	++	++	+	0	+	0	0	--	0	?	0	0	+	+	+	+

	Not within or sufficiently close to help benefit London Strategic Areas for Regeneration. The site is well provisioned in terms of facilities, reflecting its position between Church End town centre and Willesden Green town centre.	The site has a high PTAL meaning development would be car free. The associated reduction in car usage will reduce traffic and have air quality benefits in this Air Quality Management Area (AQMA). The current industrial usage of this site is inappropriate, being within a housing estate and would benefit from redevelopment, becoming more in-keeping with the character and function of the immediate area.
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an AQMA. The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.	
Barry's Garage (BSSA9)	- + ++ + ++ ++ + 0 + 0 0 -- 0 ? 0 0 + + + -	
Comments	Not within or sufficiently close to help benefit London Strategic Areas for Regeneration. The site is well provisioned in terms of facilities, reflecting its position between Church End town centre and Willesden Green town centre.	The site has a high PTAL meaning development would be car free. The associated reduction in car usage will reduce traffic and have air quality benefits in this Air Quality Management Area (AQMA). The site has some flooding concerns which should be addressed at the planning stage of development. Development will be required to reduce flood risk.
Conclusions	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an AQMA. The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.	

Dudden Hill Community Centre (BSSA10)	-	+	+	n/a	++	++	+	0	+	0	0	--	0	+	0	0	+	+	+	-
Comments	Not within or sufficiently close to help benefit London Strategic Areas for Regeneration. The site is well provisioned in terms of facilities, reflecting its position between Church End town centre and Willesden Green town centre. The redevelopment will include a new community centre to replace the existing facility.								The site has a high PTAL of 5 meaning development would be car free. The associated reduction in car usage will reduce traffic and have air quality benefits in this Air Quality Management Area (AQMA). The existing site includes a games court and a playground which have fallen into disrepair creating a poor environment. The development will result in environmental enhancements.											
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an AQMA. The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Euro Car Rental (BSSA11)	+	+	++	+	++	++	+	0	-	0	+	--	--	?	0	0	+	+	-	-
Comments	This site scores highly for socio-economic factors due to its prime location in relation to essential services and infrastructure such as town centres, employment opportunities, sports and open space, and schools. The site is also within a London Strategic Area for Regeneration and has high crime, therefore								With a low PTAL of 1b/2, this site is likely to increase traffic within the area, including the associated air and sound pollution. The site is adjacent to the Canal Feeder which is a wildlife corridor and an opportunity for redevelopment to better enhance a watercourse which in turn should improve the general environment and reduce the sites negative visual impact upon the adjacent temple. The enhancement of the watercourse and											

	represents an opportunity for enhancement through redevelopment. This site will constitute a small loss of employment floorspace which will require replacement upon redevelopment.								the increased green infrastructure should also serve to reduce the concerns of flooding on the site.												
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. This problem is exacerbated by the sites relatively low PTAL which is anticipated to increase vehicle dependence and associated traffic and pollution as it will likely require parking facilities. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																				
296 – 300 High Road (BSSA12)	-	+	+	0	++	++	+	0	+	0	0	--	0	+	0	0	+	+	-	+	
Comments	Not within or sufficiently close to help benefit London Strategic Areas for Regeneration. The site is well provisioned in terms of facilities, reflecting its position between Church End town centre and Willesden Green town centre.								The site has a high PTAL of 5 meaning development would be car free. The associated reduction in car usage will reduce traffic and have air quality benefits in this Air Quality Management Area (AQMA). The site is previously developed.												

Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an AQMA. The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Learie Constantine Centre (BSSA13)	-	+	+	+	++	++	+	0	+	0	0	--	0	+	0	0	+	+	+	+
Comments	Not within or sufficiently close to help benefit London Strategic Areas for Regeneration. The site is well provisioned in terms of facilities, reflecting its position between Church End town centre and Willesden Green town centre. The redevelopment will include a new community centre to replace the existing facility.								The site has a high PTAL meaning development would be car free. The associated reduction in car usage will reduce traffic and have air quality benefits in this Air Quality Management Area (AQMA). The existing building on this site is only single storey and is therefore not in general conformity with local character and will therefore benefit from redevelopment.											
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration associated with high levels of crime. Although the site has access to a wide range of facilities, it is not within close proximity to a local town centre and therefore scores negatively against this. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an AQMA. The majority of the borough is within an AQMA. This problem is exacerbated by the sites relatively low PTAL which is anticipated to increase vehicle dependence and associated traffic and pollution as it will likely require parking facilities. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. Concerns over fluvial flooding																			

	may be mitigated through the better management of the watercourse which passes through the site. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Morland Gardens (BSSA14)	+	+	++	+	++	++	++	0	+	0	0	--	0	+	0	?	0	+	+	+
Comments	The site is within a London Strategic Area for Regeneration and experiences high levels of crime and will therefore benefit greatly from significant levels of redevelopment. The site is also well provisioned in terms of goods and services, including essential infrastructure such as healthcare and schooling.								The site has a good PTAL of 4 which will allow for a car free development, reducing local traffic and associated pollution, improving air quality for which the site scores negatively. 1 Morland Gardens is a Local Heritage Asset and should be retained and enhanced as part of the overall design if possible.											
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with a good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. The site contains a Local Heritage Asset which should be retained and enhanced if possible, with the remainder of the development being in conformity with the design and character of this asset. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Harlesden Station Junction (BSSA15)	+	+	++	0	++	++	++	0	+	0	0	--	0	?	-	0	+	+	+	-
Comments	The site is within a London Strategic Area for Regeneration and is associated with high								The site has a strong PTAL of 6 and will therefore support car free development, reducing local traffic and associated pollution,											

	levels of crime. The development should also incur a significant uplift in residential dwellings. The site is also well provisioned in terms of goods and services, including essential infrastructure such as healthcare and schooling. The site represents secondary shopping frontage and will therefore require reprovision, incurring no net loss of commercial floorspace.								improving air quality. The site is within an Archaeological Priority Area and will therefore need to take the necessary precautions in order to prevent damage to this asset. There are also some minor surface water flooding concerns on site which can be addressed with the implementation of SUDS.											
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good a good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. The site is within an Archaeological Priority Area and will need to take necessary precautions in order to preserve this asset. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Mordaunt Road (BSSA16)	+	+	++	0	++	++	++	0	+	0	0	--	0	+	0	0	+	+	+	+
Comments	The site is within a London Strategic Area for Regeneration and experiences high levels of crime and will therefore benefit greatly from redevelopment. The site is also well provisioned in terms of goods and services, including essential infrastructure such as healthcare and schooling.								The site has a high PTAL of 5 which will allow for a car free development, reducing local traffic and associated pollution, improving air quality for which the site scores negatively.											

Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with a good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																				
Harlesden Railway Generation Station (BSSA17)	+	+	++	0	++	++	++	0	+	0	0	--	0	+	0	0	+	+	+	-	
Comments	The site is within a London Strategic Area for Regeneration associated with high levels of crime. The site is also well provisioned with essential facilities being within close proximity to Harlesden town centre and within walking distance to healthcare and schooling as well as employment opportunities.								The site has a good PTAL of 4 which should facilitate the uptake of a car free development, reducing associated traffic and pollution, increasing air quality for which the site scored negatively. The site is adjacent to the train tracks which are a designated Wildlife Corridor. Development should be sensitive so as not to reduce the ecological value of this site, enhancing it where possible with the inclusion of green infrastructure which will also serve to address the minor surface water flooding concerns on site.												
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of new housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. The site's good PTAL score means car dependency should not be increased by occupants. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards																				

	which reduces energy usage and emissions. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, development will increase intensity of use and potential negative impacts can be mitigated and wider sustainability benefits achieved.																			
Harlesden Telephone Exchange (BSSA18)	+	+	++	+	++	++	++	0	++	0	0	--	0	?	0	?	+	+	+	-
Comments	The site is within a London Strategic Area for Regeneration and is associated with high levels of crime. The development should also incur a significant uplift in residential dwellings. The site is also well provisioned in terms of goods and services, including essential infrastructure such as healthcare and schooling. The site represents secondary shopping frontage and will therefore require re-provision, incurring no net loss of commercial floorspace								The site has a strong PTAL of 6 and will therefore support car free development, reducing local traffic and associated pollution, improving air quality. The site is within an Archaeological Priority Area and will therefore need to take the necessary precautions in order to prevent damage to this asset. There are also some minor surface water flooding concerns on site which can be addressed with the implementation of SUDS.											
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good a good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. This will also serve to reduce concern over flooding by																			

	increasing permeability and incorporating other necessary mitigation measures such as SUDS. The site is within an Archaeological Priority Area and will need to take necessary precautions in order to preserve this asset. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																				
Chancel House (BSSA19)	+	+	++	0	++	++	+	0	0	0	0	0	--	-	-	0	0	+	+	+	-
Comments	This site is within a London Strategic Area for Regeneration which is associated with high crime rates. The site is well provisioned with essential infrastructure being within close proximity to Church End Town Centre, however, is greater than 1km from a secondary school. This will therefore make it an excellent location for redevelopment into a school.								The site has a relatively low PTAL, however, this will serve the local community for secondary schooling, taking pressure off of other local facilities for which local pupils may have needed to be driven, reducing associated traffic and pollution, improving air quality for which the site scored negatively. The site has some surface water flooding concerns which should be easily addressed using appropriate design techniques, incorporating green infrastructure and SUDS where necessary.												
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of new housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). This problem is exacerbated by the sites relatively low PTAL which is anticipated to increase vehicle dependence and associated traffic and pollution as it will likely require parking facilities. The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, development will increase intensity of use and potential negative impacts can be mitigated and wider sustainability benefits achieved.																				
Harlesden Neighbourhood Plan site allocations	The following sites are allocated in the Harlesden Neighbourhood Plan: • Harley Road • Carsales at junction of High Street and Furness Road • Former Willesden Ambulance Station																				

	• Land at Challenge Close • Salvation Army & Manor Park Works • Harlesden Plaza These sites have not been assessed through the IIA as they form part of the made Harlesden Neighbourhood Plan, which has been subject to a Strategic Environmental Assessment. The Harlesden Neighbourhood Plan can be viewed here: https://www.brent.gov.uk/media/16412964/np-final-may-2019.pdf

South East

	Socio-economic								Environmental											
Site	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	EN11a	EN12a	EN12b	EN12c
Austen (BSESA1)	+	+	++	+	++	+	+	0	+	0	0	-	0	+	0	0	+	+	+	-
Comments	This site is within a London Strategic Area for Regeneration and should provide approximately 100 residential units. The area currently has high crime levels which may be exacerbated by the buildings poor design, with inactive ground floor frontages. Redevelopment will help to reduce crime within the immediate area through increased passive surveillance. The site has high levels of accessibility to essential infrastructure such as healthcare, schooling, and sporting facilities. The site currently contains some community/cultural uses which will require retention upon redevelopment.								The site has a high PTAL making it suitable for car free development, reducing associated traffic and air pollution. The existing building on site provides a poor environment and will therefore not be beneficial to retain. Its replacement with a more appropriate building incorporating sound modern design principals will help improve the feel of the area and create a sense of place. The sites current has low permeability and areas at risk of surface water flooding. Mitigation will be required to ensure development reduces flood risk.											

Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																				
Blake (BSEA2)	++	+	++	++	++	+	+	0	+	0	0	--	0	+	0	0	+	+	+	-	
Comments	This site is within a London Strategic Area for Regeneration and should provide approximately 120 residential units. The area currently has high crime levels which may be exacerbated by the buildings poor design, with inactive ground floor frontages. Redevelopment will help to reduce crime within the immediate area through increased passive surveillance. The site has high levels of accessibility to essential infrastructure such as healthcare, schooling, and sporting facilities.								The site has a high PTAL making it suitable for car free, reducing associated traffic and air pollution. The existing building on site provides a poor environment and will therefore not be beneficial to retain. Its replacement with a more appropriate building incorporating sound modern design principals will help improve the feel of the area and create a sense of place. The site currently has low permeability and areas at risk of surface water flooding. Mitigation will be required to ensure development reduces flood risk.												
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. This will also serve to reduce concern over flooding by																				

	increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Carlton House (BSESA3)	+	+	++	++	0	+	+	0	+	0	0	--	0	+	0	0	+	+	+	+
Comments	This site is within a London Strategic Area for Regeneration and should provide approximately 60 residential units. The site has high levels of accessibility to essential infrastructure such as healthcare, schooling, and sporting facilities.								The site has a good PTAL rating of 5 and is therefore suitable for car free development, reducing associated traffic and air pollution. The site will benefit from a change in layout, restructuring the site in accordance with surrounding allocations in order to provide clarity as to which areas of open space are private and which are public. This will serve to increase the usage of the open space by both residents and the general public.											
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an AQMA. The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Carlton Infant School (BSESA4)	+	+	++	+	0	+	+	0	-	0	0	--	--	?	0	0	+	+	+	-
Comments	The existing school on this site will be reprovided on the Wordsworth and Masefield site allocation and will therefore not represent a loss of school floorspace. This site is within a London Strategic Area for Regeneration and should provide approximately 62 residential units. The site has high levels of accessibility to essential infrastructure such								The site has a poor PTAL rating of 2, however, the neighbouring site of Kilburn Park Junior School has a PTAL rating of 5. Therefore, it should be possible for this site to have limited parking facilities provided in order to reduce potential traffic and carbon emissions. The site has some surface water flooding concerns which can be mitigated via the incorporation of SUDS.											

	as healthcare, schooling, and sporting facilities.																			
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. This problem is exacerbated by the sites relatively low PTAL which is anticipated to increase vehicle dependence and associated traffic and pollution as it will likely require parking facilities. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Craik (BSESA5)	++	+	++	-	0	+	+	0	+	0	0	--	0	?	0	0	+	+	+	+
Comments	This site is within a London Strategic Area for Regeneration and should provide approximately 120 residential units, although there will be net loss of units overall. The site has high levels of accessibility to essential infrastructure such as healthcare, schooling, and sporting facilities.								The site has a good PTAL rating of both 4 and 5 and is therefore suitable for car free development, reducing associated traffic and pollution. The site will benefit from a change in layout, restructuring the site in accordance with surrounding allocations in order to provide clarity as to which areas of open space are private and which are public. This will serve to increase the usage of the open space by both residents and the general public.											
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			

Crone & Zangwill (BSESA6)	+	+	++	+	0	+	+	0	+	0	0	--	0	?	0	0	+	+	+	-
Comments	This site is within a London Strategic Area for Regeneration and should provide approximately 145 residential units. The site has high levels of accessibility to essential infrastructure such as healthcare, schooling, and sporting facilities.								The site has a good PTAL rating of both 4 and 5 and therefore suitable for car free, reducing associated traffic and air pollution. The site will benefit from a change in layout, restructuring the site in accordance with surrounding allocations in order to provide clarity as to which areas of open space are private and which are public. This will serve to increase the usage of the open space by both residents and the general public. Flooding concerns will be mitigated through the incorporation of SUDS and soft landscaping.											
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Dickens (BSESA7)	+	+	++	+	++	+	+	0	0	0	0	--	-	+	0	0	+	+	+	-
Comments	This site is within a London Strategic Area for Regeneration and should provide approximately 60 residential units. The area currently has high crime levels which may be exacerbated by the buildings poor design, with inactive ground floor frontages. Redevelopment will help to reduce crime within the immediate area through increased								The site has a PTAL rating of 3, however, it is still within close proximity to Queen’s Park Station and should therefore still aim to be car free or light. This will help to reduce traffic and associated air pollution within the borough. The site has some minor surface water flooding concerns which can be mitigated through SUDS and soft landscaping.											

	passive surveillance. The site has high levels of accessibility to essential infrastructure such as healthcare, schooling, and sporting facilities.																			
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. This problem is exacerbated by the sites relatively low PTAL which is anticipated to increase vehicle dependence and associated traffic and pollution as it will likely require parking facilities. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Hereford House & Exeter Court (BSESA8)	++	+	++	+	0	+	+	0	++	0	0	--	0	?	0	0	+	+	+	-
Comments	This site is within a London Strategic Area for Regeneration and should provide approximately 200 residential units, although there will be a net gain of fewer than 100. The site has high levels of accessibility to essential infrastructure such as healthcare, schooling, and sporting facilities.									The site has a high PTAL and is therefore suitable for car free development, reducing associated traffic and air pollution. The existing building on site provides a poor environment and will therefore not be beneficial to retain. Its replacement with a more appropriate building incorporating sound modern design principals will help improve the feel of the area and create a sense of place. The site is earmarked to offset the loss of Granville Open Space with the provision of a replacement open space. This will improve the site aesthetically and will also serve to mitigate the significant surface water flooding concerns by increasing land permeability with soft landscaping.										

Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Kilburn Park Junior School (BSESA9)	+	+	++	0	0	+	+	0	+	0	0	--	0	?	0	0	+	+	+	+
Comments	The existing school on this site will be reprovided on the Wordsworth and Masefield site allocation and will therefore not represent a loss of school floorspace. The open space lost as a result of the school relocation will be reprovided here to create a more regular shaped park. There will be no net loss of open space. The site is within a London Strategic Area for Regeneration. The site has high levels of accessibility to essential infrastructure such as healthcare, schooling, and sporting facilities.								The site has a good PTAL rating of both 4 and 5 which will help provide residents with efficient access to the park and its facilities. The open space will be situated in a prominent area on this site being between both Queen's Park and Kilburn Lane helping improve the area aesthetically and forming a sense of place.											
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. This problem is exacerbated by the sites relatively low PTAL which is anticipated to increase vehicle dependence and associated traffic and pollution																			

	as it will likely require parking facilities. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Neville & Winterleys (BSESA10)	+	+	++	+	0	+	+	0	+	0	0	--	0	+	0	0	+	+	+	+
Comments	This site is within a London Strategic Area for Regeneration and should provide approximately 140 residential units. The site has high levels of accessibility to essential infrastructure such as healthcare, schooling, and sporting facilities.								The site has a good PTAL rating of 5 and is therefore suitable for car free development, reducing associated traffic and air pollution. The site will benefit from a change in layout, restructuring the site in accordance with surrounding allocations in order to provide clarity as to which areas of open space are private and which are public. This will serve to increase the usage of the open space by both residents and the general public.											
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			

Old Granville Open Space (BSESA11)	+	+	++	+	++	+	+	0	+	0	0	--	0	?	0	0	--	+	+	-
Comments	Site is within a London Strategic Area for Regeneration and should provide approximately 10 units. The site currently suffers from high levels of crime due to inactive frontage and poor site layout which redevelopment will address. The site is well provisioned with good access to essential infrastructure.								The site is currently a small open space, serving as a connector between the two parts of Granville road. This is set to be replaced and incorporated within the Hereford & Exeter site so there will not be an overall reduction in open space serving this community. The site has a high PTAL and should be car free, reducing negative impacts from traffic and air pollution.											
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with a good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against the loss of designated open space which will require re-provision to ensure no overall net loss. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Wordsworth & Masefield (BSESA12)	+	+	++	-	++	+	+	0	+	0	0	--	0	+	0	0	+	+	+	+
Comments	This site is within a London Strategic Area for Regeneration. Redevelopment will help to reduce crime within the immediate area through increased passive surveillance. The site has high levels of accessibility to essential infrastructure such as healthcare, schooling, and sporting facilities.								The site has a relatively high PTAL which will facilitate the development of a school whereby pupils generally use public transport or walk/cycle for travel. Therefore, the development should minimise parking provision in order to encourage active travel and use of public transport, reducing associated traffic and air pollution.											

Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																				
John Ratcliffe House (BSESA13)	+	+	++	+	0	+	+	0	+	0	0	--	0	+	0	0	+	+	+	+	
Comments	This site is within a London Strategic Area for Regeneration and should provide approximately 35 residential units. The site has high levels of accessibility to essential infrastructure such as healthcare, schooling, and sporting facilities.								The site has a high PTAL and therefore suitable for car free development, reducing associated traffic and air pollution. The existing building on site provides a poor environment and will therefore not be beneficial to retain. Its replacement with a more appropriate building incorporating sound modern design principals will help improve the feel of the area and create a sense of place.												
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																				
William Dunbar (BSESA14)	++	+	++	++	0	+	+	0	+	0	0	--	0	?	0	0	+	+	+	+	

Comments	The site is within a London Strategic Area for Regeneration with redevelopment providing a significant uplift of approximately 200 dwellings providing the area with more affordable housing. With a strong PTAL of 5, the site has good access to a range of goods and services, including healthcare and schooling. The site is not within close proximity to a secondary school, however, as it is close to the borough boundary it may be serviced by the neighbouring boroughs.								The site has a high PTAL and therefore suitable for car free development, reducing associated traffic and air pollution. Redevelopment should provide a strong active ground floor commercial frontages which will help strengthen connections between Queen's Park Station and the Peel development. Redevelopment will also increase the permeability of the area for pedestrians by opening up Denmark Road.											
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
UK Albanian Muslim Community and Cultural Centre (BSESA15)	+	+	++		0	+	+	0	+	0	0	--	0	?	0	0	+	+	+	+
Comments	The site is within a London Strategic Area for Regeneration. With a good PTAL of 4, the site has good access to goods and services, including healthcare and schooling. The site is not within close proximity to a secondary school, however, as it is close to the borough								The site has a high PTAL and therefore suitable for car free development, reducing associated traffic and air pollution. Given the high PTAL it will be acceptable to build at higher densities than exists, this will also provide the opportunity to enhance the streetscape, including active frontages upon redevelopment.											

	boundary it may be serviced by the neighbouring boroughs.																			
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
OK Club (BSESA16)	+	+	++		0	+	+	0	+	0	0	--	0	+	0	0	+	+	+	+
Comments	The site is within a London Strategic Area for Regeneration. With a good PTAL of 4, the site has good access to goods and services, including healthcare and schooling. The site is not within close proximity to a secondary school, however, as it is close to the borough boundary it may be serviced by the neighbouring boroughs.								The site has a high PTAL and is therefore suitable for car free development, reducing associated traffic and air pollution. The sites current use as a community centre should be retained and enhanced. It may be possible to replace this facility off site providing this is not to the detriment of the local community.											
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Cricklewood Broadway	-	+	++	+	0	++	+	0	0	0	0	--	-	?	0	0	+	+	+	-

Retail Park (BSESA17)																				
Comments	The site is not within or sufficiently close to help benefit London Strategic Areas for Regeneration. Neither is the site within an area with high levels of crime. The site has significant capacity and should provide an uplift of approximately 300 residential dwellings. The site has good access to facilities including sports, health and schooling and is in close proximity to Cricklewood town centre.								The site has a PTAL rating of both 3 and 4, and therefore could support car free or light development in order to reduce traffic and associated pollution. The site currently includes two big box stores with large amounts of parking and limited green infrastructure. This creates a poor environment and would benefit from redevelopment, bringing the site into greater conformity with local character. The sites current has low permeability and areas at risk of surface water flooding. Mitigation will be required to ensure development reduces flood risk.											
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good accessibility to a range of essential infrastructure. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. This problem is exacerbated by the sites relatively low PTAL which is anticipated to increase vehicle dependence and associated traffic and pollution as it will likely require parking facilities. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
243-289 Cricklewood Broadway (BSESA18)	0	+	++	+	++	++	+	0	+	0	0	--	0	?	0	0	+	+	+	+
Comments	Site is within close proximity to a London Strategic Area for Regeneration and will hopefully provide a significant uplift in housing to the area of approximately 60 units. The site is within Cricklewood town centre and therefore has good access to a								The site has a good PTAL rating which will facilitate car free development reducing associated traffic and air pollution. The site currently creates a poor environment and is inconsistent with local character. Therefore, redevelopment would help bring the sites character back into local conformity, improving the environment generally.											

	range of essential facilities including sports, healthcare and schooling. The site is designated as primary shopping frontage therefore requiring any redevelopment to replace/enhance any lost commercial/employment floorspace.																			
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Gaumont State Cinema (BSESA19)	+	+	++	0	++	+	+	0	+	0	0	--	0	+	0	?	0	+	+	+
Comments	The site is within a London Strategic Area for Regeneration which has significant crime problems. The protection and increased use of this community/cultural facility will therefore have a high impact in this respect. The retention of this site for community/cultural purposes will help retain valuable employment opportunities for local residents.								The site has a high PTAL rating and in a town centre location. Meaning users can access via public transport and should not place further significant pressure on the road network. Continued use will protect this listed building for future generations.											
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of a community/cultural facility in a high PTAL location which resides within an area with high levels of access to essential infrastructure. This also helps direct investment toward a London Strategic Area for Regeneration, which																			

	also has high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Kilburn Market Square (BSESA20)	++	+	++	++	++	+	+	0	++	0	0	--	0	+	0	?	+	+	+	+
Comments	The site is within a London Strategic Area for Regeneration which has significant crime problems. The site is large and should provide approximately 100 residential units, with a mixed development approach. The redevelopment of this site will enforce a sense of place and pride within the area, helping to reduce crime levels. The mixed use development will enable the creation of a new market and employment space.								The site has a PTAL of 6 which will facilitate car free, reducing associated traffic and air pollution. The sites current has low permeability and areas at risk of surface water flooding. Mitigation will be required to ensure development reduces flood risk. The creation of a new public square and soft landscaping as part of the development will improve the townscape.											
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			

Sainsbury's and Garages (BSESA21)	-	+	+	+	++	++	++	0	+	0	0	--	0	?	0	0	+	+	+	-
Comments	Not within or sufficiently close to help benefit London Strategic Areas for Regeneration. Being within Willesden Green the site has great access to essential goods and services, such as healthcare and schooling. The site is fairly large and should help uplift the area with 50 residential units, increasing town centre viability. The current use of the site as a supermarket helps meet the boroughs need for convenience retail floorspace. Therefore, any proposed development should include the retention of a supermarket.								The site has a good PTAL rating of 4 and is therefore suitable for car free development, helping reduce the dependency on personal vehicles, reducing associated traffic and emissions. The site currently has surface water flooding concerns as a result of its low permeability. Mitigation will be required to ensure development reduces flood risk.											
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with a good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on private vehicles. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Queens Parade (BSESA22)	-	+	+	+	++	++	++	0	+	0	0	--	0	?	0	0	+	+	+	+

Comments	Not within or sufficiently close to help benefit London Strategic Areas for Regeneration. The site is located within Willesden Green town centre and therefore has good access to a range of essential infrastructure, such as healthcare and schooling. The site is designated as primary shopping frontage and therefore any redevelopment will need to replace any lost commercial floorspace, retaining sufficient employment opportunities.								With a PTAL of 4, increasing to 5 come 2031 with the introduction of new public transport infrastructure, this site will support car free development. This will help improve the areas air quality and will facilitate more walking, improving the vitality of the town centre.											
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with a good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on private vehicles. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved																			
Willesden Green Police Station (BSESA23)	-	+	++	+	++	++	++	0	+	0	0	--	0	+	0	0	0	+	+	+
Comments	The site is not within or sufficiently close to help benefit London Strategic Areas for Regeneration. Being within Willesden Green town centre the site has good access to facilities including sports, health and schooling.								The site has a good PTAL rating which will facilitate car free development reducing associated pollution and traffic.											
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good accessibility to a range of essential infrastructure, helping direct																			

	investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Kilburn Station Arches, Exeter Road, NW2 3UH (BSESA24)	-	-	++	0	++	+	+	0	+	0	0	--	0	+	0	0	0	+	+	+
Comments	The site is not within a London Strategic Area for Regeneration, however, it is subject to high crime rates. The site is within Kilburn Town Centre and is designated as Secondary Shopping Frontage and therefore has good access to a range of goods and services. The site is not within close proximity to healthcare or secondary schooling, however, it is positioned on the borough boundary and may therefore be serviced by facilities in the neighbouring borough. As the site represents Secondary Shopping Frontage it is important that the commercial floorspace is not lost and is reprovisioned upon redevelopment.									The site has a strong PTAL of 5 which supports implementation of a car free development, reducing associated traffic and pollution, improving air quality for which the site scores negatively.										

Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of new housing in an area with good accessibility to a range of essential infrastructure, with the exception of healthcare, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. The site's good PTAL score means car dependency should not be increased by occupants. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. In summary, development will increase intensity of use and potential negative impacts can be mitigated and wider sustainability benefits achieved.																				
Park Avenue Garage (BSESA25)	-	+	+	+	++	++	+	0	0	0	0	--	-	?	0	0	+	+	+	-	
Comments	Not within or sufficiently close to help benefit London Strategic Areas for Regeneration. The site is well provisioned for with essential infrastructure and access to local employment opportunities, being within walking distance of Willesden Green town centre.								With a PTAL of 3 the site will likely require parking facilities, potentially increasing traffic within the borough and associated carbon emissions, reducing air quality within the area. Part of the site is a risk of surface water flooding. This will require mitigation to ensure development reduces flood risk.												
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. This problem is exacerbated by the sites relatively low PTAL which is anticipated to increase vehicle dependence and associated traffic and pollution as it will likely require parking facilities. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																				

Park Avenue North Substation (BSESA26)	-	+	+	0	++	++	+	0	0	0	0	--	-	?	0	0	+	+	+	-
	Not within or sufficiently close to help benefit London Strategic Areas for Regeneration. The site is well provisioned for with essential infrastructure and access to local employment opportunities, being within walking distance of Willesden Green town centre.								With a PTAL of 2 the site will likely require parking facilities, potentially increasing traffic within the borough and associated carbon emissions, reducing air quality within the area. Park Avenue North is at risk of surface water flooding with some sections encroaching onto the site. This will require mitigation to ensure development reduces flood risk. The adjacent railway tracks are a Wildlife Corridor which should not be disturbed by development.											
	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. This problem is exacerbated by the sites relatively low PTAL which is anticipated to increase vehicle dependence and associated traffic and pollution as it will likely require parking facilities. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Strode Road Car Wash (BSESA27)	-	+	++	0	++	++	+	0	+	0	0	--	0	?	0	0	+	+	+	+
Comments	Not within or sufficiently close to help benefit London Strategic Areas for Regeneration. The site is well provisioned for, just being off of the main High Road and in close proximity to Willesden Green town centre and local employment opportunities.								The site has a good PTAL rating of 5 which should facilitate car free development. This will help mitigate air quality problems within the borough. The site is currently used as a car wash, consisting of a walled off car park with some small outbuildings which provides a sense of neglect. Redevelopment will help positively improve the area aesthetically.											

Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with a good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on private vehicles. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																				
Strode Road (BSESA28)	-	+	++	+	++	++	+	0	+	0	0	--	0	?	0	0	+	+	+	+	
Comments	Not within or sufficiently close to help benefit London Strategic Areas for Regeneration. The site is well provisioned for, being just off the main High Road and in close proximity to Willesden Green town centre and local employment opportunities.								The site has a good PTAL rating of 5 which should facilitate car free development. This will help mitigate air quality problems within the borough. The area currently lacks green infrastructure, therefore redevelopment provides an opportunity to improve this situation.												
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with a good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on private vehicles. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved																				

Willesden Telephone Exchange (BSESA29)	-	+	++	+	++	++	+	0	0	0	0	--	-	0	0	0	0	0	+	+	-
Comments	The site is not within or sufficiently close to help benefit London Strategic Areas for Regeneration. The site has good access to facilities including sports, health and schooling and is in close proximity to Willesden Green town centre.								The site has a relatively low PTAL of 3 and therefore may require parking facilities, increasing car usage within the borough and its associated traffic and pollution.												
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. This problem is exacerbated by the sites relatively low PTAL which is anticipated to increase vehicle dependence, associated traffic and pollution as it will likely require parking facilities. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																				
61 Shoot Up Hill (BSESA30)	-	+	++	+	++	++	-	0	+	0	0	--	0	?	0	?	0	+	+	+	
Comments	The site is not within or sufficiently close to help benefit London Strategic Areas for Regeneration. The site is well provided for in terms of most facilities with the acceptance of schools for which the site scored negatively. However, the site is on the borough boundary and may be served by schools and other facilities within the neighbouring borough.								The site has a good PTAL rating which will facilitate car free development reducing traffic and associated air pollution. The site currently includes two locally listed buildings which should be retained if possible. 65 Shoot Up Hill is a single storey garage and is not in-keeping with local character, creating a poor environment. Redevelopment will improve this site aesthetically and also help better utilise it, increasing its residential density.												

	There is a doctor's surgery on site which may need to be re-provided.																			
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good accessibility to a range of essential infrastructure, with the exception of schools, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Turpins Yard (BSESA31)	+	+	++	+	++	++	+	0	+	0	0	--	0	?	0	0	+	+	+	-
Comments	The site is within a London Strategic Area for Redevelopment. The site is well provisioned in terms of infrastructure, including healthcare, schooling, and sporting facilities. This is a local employment site, with a number of prior approvals for conversion to housing. A mixed-use scheme will ensure employment space is provided and protected. This site currently represents valuable employment floorspace which is under threat of conversion to residential under permitted development rights. Redevelopment should retain/enhance this floorspace via a mixed development approach.								This site has a PTAL rating of 4 and should therefore be car free, reducing associated traffic and air pollution within the area. The sites current has low permeability and areas at risk of surface water flooding. Mitigation will be required to ensure development reduces flood risk.											
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration associated with high																			

	levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
45-55 Cricklewood Broadway (BSESA32)	0	+	++	+	++	++	-	0	+	0	0	--	0	?	0	0	+	+	+	+
Comments	Site is within close proximity to a London Strategic Area for Regeneration. The site is well provided for in terms of most facilities with the acceptance of schools for which the site scored negatively. However, the site is on the borough boundary and may be served by schools and other facilities within the neighbouring borough. The site is designated as secondary shopping frontage and therefore any existing commercial/employment floorspace will look to be retained/enhanced.								The site has a good PTAL rating which will facilitate car free development reducing traffic and associated air pollution. The site currently creates a poor environment and is inconsistent with local character. Therefore, redevelopment would help bring the sites character back into local conformity, improving the environment generally.											
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good accessibility to a range of essential infrastructure, with the exception of schools, helping direct investment toward a London Strategic Area for Regeneration associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located																			

	so as to reduce the reliance on personal vehicles. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
123-129 Cricklewood Broadway (BSESA33)	+	+	+	+	++	++	+	0	+	0	0	--	0	?	0	?	+	+	+	+
Comments	The site is within a London Strategic Area for Regeneration and experiences high levels of crime making it ideal for redevelopment. It is also well serviced by facilities being within Cricklewood Town Centre and within close proximity to schooling and healthcare. The site constitutes part of Cricklewood Town Centres Primary Shopping Frontage meaning redevelopment should incur no net loss of commercial floorspace.								The site has a good PTAL rating which will facilitate car free development reducing traffic and associated air pollution. The site is within a Site of Archaeological Importance and any redevelopment should therefore take measures to ensure the protection of this asset. The site will benefit from redevelopment, bringing it into greater conformity with the general character of Cricklewood Town Centre.											
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration which is associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. The site is within a Site of Archaeological Importance and should therefore take the necessary precautions prior to development in order to ensure the protection of this asset. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			

Kilburn Park Underground Station (BSESA34)	+	+	++	?	++	+	+	0	++	0	0	--	0	0	0	?	0	+	+	-	
	The site is within a London Strategic Area for Regeneration and experiences high levels of crime marking it ideal for redevelopment. The site is well served by facilities such as open space, but not as well served for healthcare and schooling. However, the site is located on the borough boundary and therefore may be served by facilities in a neighbouring borough. The site is allocated for use as a station on the ground floor and for commercial / residential on the upper floors. The amount of proposed residential use is unknown.								The site has a high PTAL which should facilitate car free development, helping to encourage more sustainable modes of transport, reducing associated traffic and air pollution, improving air quality for which the site has scored negatively. The site contains a listed building and redevelopment should therefore seek to enhance this asset, being sure as not to impact upon its character. Developers should provide a detailed analysis and justification of the potential impact of the development on the heritage asset.												
	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with good accessibility to a range of essential infrastructure. The site is not within close proximity to either schools or healthcare facilities, however, due to its proximity to the borough boundary it may be served by facilities in the neighbouring borough. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an AQMA. The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																				
303-309 Cricklewood Broadway (BSESA35)	-	+	++	+	++	++	+	0	+	0	0	--	0	?	0	0	+	+	+	+	

Comments	The site is not within or sufficiently close to help benefit London Strategic Areas for Regeneration. The site has significant capacity and should provide an uplift of approximately 50 residential dwellings. The site has good access to facilities including sports, health and schooling and is in close proximity to Cricklewood town centre.	The site has a good PTAL rating which will facilitate car free development reducing associated traffic and air pollution. The site will benefit from redevelopment to a form which is more sympathetic to uniform character and scale of Cricklewood High Road.
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.	

South West

	Socio-economic								Environmental											
Site	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	EN11a	EN12a	EN12b	EN12c
Alperton Industrial Sites (BSWSA1)	-	+	++	++	++	++	-	0	+	0	+	-	0	?	0	0	+	+	0	-
Comments	The site is not within a London Strategic Area for Regeneration, however, it is within an area which is subject to high crime rates and therefore should benefit greatly from redevelopment. The site is within close proximity to Ealing Road town centre and therefore has access to a wide range of essential facilities with the exception of schools. The site is close to the borough boundary and may make use of the facilities of the neighbouring borough of Ealing. The site is designated as a Locally Significant Industrial Site and an operational bus garage of equivalent capacity needs to be retained / re-provided on the site unless TfL confirms that it is no longer operationally required, or suitable replacement can be found elsewhere.								The site benefits from immediate proximity to Alperton Tube Station and therefore has a relatively high PTAL of 4. This should facilitate car free developments throughout the majority of the sites which will help reduce local traffic and pollution. The sites southern boundary is adjacent to the Grand Union canal and therefore represents an opportunity to enhance a watercourse, improving its integration with nature and the wider public realm. The promotion of a mixed residential/industrial development will make for a better public realm with higher quality design than currently exists, helping improve the sense of place. The railway tracks which border the site to the east are a wildlife corridor. Efforts should be made to integrate this into development proposals, increasing green infrastructure along this edge in particular. Helping reduce potential for flooding in the process.											
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with a good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward an area associated with high levels of crime. The site is not within close proximity to schools, however, due to its proximity to the borough boundary it may be served by facilities in the neighbouring borough. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores																			

	negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. This development can enhance the on-site watercourse by contributing to naturalisation. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Sainsbury's Alperton (BSWSA2)	-	+	++	++	++	++	-	0	0	0	+	--	-	+	0	?	0	+	0	-
	The site is not within a London Strategic Area for regeneration, however, it is located within an area of high crime. The site is well served by facilities such as open space, distance to healthcare and services and facilities, however the site schools poorly in terms of walking distance to schooling provision. The site is allocated for residential development of approximately 200 dwellings, plus retention or replacement of the existing store.								The site has a fairly high PTAL of 4 but is located within the Alperton Growth Area, with a reasonable level of public transport accessibility. Development should aim to be air quality positive. The site is of archaeological importance, so proposals should demonstrate consideration of BHC1 towards the significance of the heritage asset and its wider context. The north of the site is adjacent to the Grand Union Canal, forming part of a green chain. A small proportion of the site is within an area with a risk of 1 in 100-year surface water flood risk.											
	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with good accessibility to a range of essential infrastructure. Mixed effects are predicted against environmental criteria with most impacts being neutral. Development should provide a detailed analysis and justification of the potential impact of the development on the heritage asset. As the site is adjacent to the Grand Union Canal (part of a green chain), enhancement of green / blue infrastructure is encouraged. Developers will be encouraged to explore the use of canal water as a low carbon energy source. Developers will be required to carry out a flood risk assessment and mitigations put in place if necessary. The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			

Atlip Road (BSWSA3)	-	+	++	++	++	++	-	0	+	0	0	--	0	?	0	0	+	+	-	-
Comments	The site is not within a London Strategic Area for Regeneration, however, it is within an area which is subject to high crime rates and therefore should benefit greatly from redevelopment. The site is within close proximity to Alperton town centre and therefore has access to a wide range of essential facilities with the exception of schools. Redevelopment should ensure the re-provision of the commercial units along Ealing road, maintaining an active retail frontage at ground floor level.								The site benefits from immediate proximity to Alperton Tube Station and therefore has a relatively high PTAL of 4. This should facilitate car free development which will help reduce local traffic and pollution. The site borders railway tracks to the west which are a designated Wildlife Corridor. Efforts should be made to integrate this into development proposals, increasing green infrastructure along this edge in particular. Helping reduce potential for flooding in the process.											
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with a good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward an area associated with high levels of crime. The site is not within close proximity to schools, however, due to its proximity to the borough boundary it may be served by facilities in the neighbouring borough. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			

Sunleigh Road (BSWSA4)	-	+	++	++	++	++	-	0	-	0	+	--	--	?	0	0	+	+	-	+
Comments	The site is not within a London Strategic Area for Regeneration, however, it is within an area which is subject to high crime rates and therefore should benefit greatly from redevelopment. The site is well provisioned in terms of facilities, being within relatively close proximity to Alperton town centre. The site is over 500m from the nearest primary school, however, the site is near the borough boundary and may be served in this respect by the neighbouring borough of Ealing. Redevelopment of the site will incur a loss of mixed use employment floorspace. Re-provision of this flexible/affordable floorspace should be sort upon redevelopment.								The site has a low PTAL rating, unlikely to rise sufficiently to facilitate car free development. This will increase the likely car dependence of residents on site, increasing associated traffic and pollution. The site backs onto the Grand Union canal and therefore represents an opportunity to enhance a watercourse. Development should focus on its integration with the canal, increasing levels of green infrastructure and accessibility from the public. The site also includes a Site of Archaeological Importance. Therefore, developers should provide a detailed analysis and justification of the potential impact of the development on the heritage asset.											
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward an area associated with high levels of crime. The site is not within close proximity to schools, however, due to its proximity to the borough boundary it may be served by facilities in the neighbouring borough. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). This problem is exacerbated by the sites relatively low PTAL which is anticipated to increase vehicle dependence and associated traffic and pollution as it will likely require parking facilities. The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage																			

	and emissions. This development can enhance the adjacent watercourse by contributing to planting. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Abbey Manufacturing Estate (BSWSA5)	-	+	++	++	++	++	++	0	-	0	+	--	--	?	0	0	+	+	-	-
Comments	The site is not within a London Strategic Area for Regeneration, however, it is within an area which is subject to high crime rates and therefore should benefit greatly from redevelopment. The site is within close proximity to Alperton town centre and therefore has access to a wide range of essential facilities including healthcare, schooling, and sports/open spaces. The site is currently used for light industrial purposes which redevelopment should look to retain on ground floor units, minimising loss of industrial/employment floorspace, enhancing where possible.								Although the site is within reasonable proximity to Alperton tube station, it still only has a PTAL of 2, however, given the level of development within the Alperton Growth Area, it should hopefully increase along with local investments. With a low PTAL the site is likely to require parking facilities and will therefore increase car dependence on site, adding to the associated traffic and pollution in the area. The sites southern boundary is adjacent to the Grand Union canal and therefore represents an opportunity to enhance a watercourse, improving its integration with nature and the wider public realm. There are minor surface water flooding concerns near the southern boundary which should be easily mitigated by increasing permeability with higher levels of green infrastructure associated with the natural enhancement of the watercourse.											
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). This problem is exacerbated by the sites relatively low PTAL which is anticipated to increase vehicle dependence and associated traffic and pollution as it will likely require parking facilities. The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. This development can be centred																			

	around enhancing the on-site watercourse w by contributing to naturalisation. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Beresford Avenue (BSWSA6)	-	+	++	++	++	++	++	0	-	0	+	--	--	?	0	0	+	+	-	-
Comments	The site is not within a London Strategic Area for Regeneration, however, it is within an area which is subject to high crime rates and therefore should benefit greatly from redevelopment. Redevelopment will reactivate frontages onto Beresford Avenue, increasing passive surveillance and reducing crime. The site is well provisioned with regards to essential facilities, having good accessibility to healthcare, schooling, and sports/open space. Given that the site is existing industrial land, no let loss and re-provision of industrial floorspace will be sought.								The site has a low PTAL rating, unlikely to rise sufficiently given surrounding intensification to facilitate car free development. This will increase the likely car dependence of residents on site, increasing associated traffic and pollution. The site backs onto the Grand Union canal and therefore represents an opportunity to enhance a watercourse. Development should focus on its integration with the canal, increasing levels of green infrastructure and accessibility from the public.											
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). This problem is exacerbated by the sites relatively low PTAL which is anticipated to increase vehicle dependence and associated traffic and pollution as it will likely require parking facilities. The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. This development can enhance integration with the adjacent watercourse by contributing to naturalisation. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			

Northfields (BSWSA7)	0	-	++	++	++	+	++	++	0	--	+	--	--	?	-	0	++	-	-	-
	The site is not within a London Strategic Area for regeneration, however, it is located within an area of high crime. The site is well served by facilities such as open space, distance to services and facilities and schooling but performs poorly in terms of access to healthcare. The site is allocated for mixed-use residential-led development (approximately 2900 dwellings).								The site has a low PTAL rating of between 0-3 (2031 estimate), however, this may be revised in light of new development. Development should aim to be air quality positive as the site is located within an Air Quality Management Area (AQMA) and within a Growth Area. The Grand Union Canal and River Brent run adjacent to parts of the site, and the site is also adjacent to a green chain and a wildlife corridor (Grade II SIN). The south of the site is categorised as Flood Zone 3a and 3b and susceptible to surface water, fluvial and tidal flooding and groundwater flooding.											
	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with good accessibility to a range of essential infrastructure. Mixed effects are predicted against environmental criteria, with some negative impacts. As the site is adjacent to the Grand Union Canal and River Brent, enhancement of green / blue infrastructure is encouraged. Developers will be required to carry out a flood risk assessment and mitigations put in place if necessary. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Wembley High Road (BSWSA8)	-	+	++	++	++	++	++	0	+	0	0	--	0	?	-	?	+	+	+	+
Comments	The site is not within a London Strategic Area for Regeneration, however, it is within an area which is subject to high crime rates and								The site has a high PTAL which should facilitate car free development, reducing associated traffic and carbon emissions. The site is bound in the north by railway tracks which are											

	therefore should benefit greatly from redevelopment. The site is within Wembley town centre and therefore has access to a wide range of facilities including healthcare, schooling, and sports/open space. The site currently contains units which represent some of Wembley town centres primary frontage. Redevelopment should therefore not result in a net reduction of commercial floorspace.	designated a Wildlife Corridor and a Grade I Site of Importance for Nature Conservation. Developments should look to enhance this asset, integrating additional green infrastructure into this section of the site, seeking not to compromise the habitats function as a wildlife corridor. The site also includes a Site of Archaeological Importance. Therefore developers should provide a detailed analysis and justification of the potential impact of the development on the heritage asset.																		
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with a good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. Part of the site is within a designated nature reserve which should be enhanced for wildlife upon redevelopment. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Former Copland School (BSWSA9)	-	+	++	++	0	++	++	0	++	0	0	--	0	?	0	?	0	+	+	-
Comments	The site is not within a London Strategic Area for Regeneration, neither is it within an area which experiences high crime rates. Well served by essential facilities, the site has good access to healthcare, schooling, and sports/open space. The site has potential to help link up the public domain of the newly redeveloped Wembley								The site has an exceptional PTAL rating of 6a, being within close proximity to numerous train stations and bus stops. This will go a long way toward facilitating a car free development which will not contribute negatively toward local traffic and air quality. The site has minor surface water flooding concerns which should be easily mitigated through the incorporation of SUDS.											

	Park area with the retail units along Wembley High Road through an improved commercial frontage and public realm.																			
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with a good PTAL and good accessibility to a range of essential infrastructure. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Elm Road (BSWSA10)	-	+	++	++	++	++	++	+	+	0	0	--	0	+	-	0	0	+	+	-
Comments	The site is not within a London Strategic Area for regeneration, however, it is located within an area of high crime. The site is well served by facilities such as open space, distance to services and facilities, distance to schooling and healthcare. The site is allocated for mixed-use residential-led development (approximately 400 dwellings), including hotel and community facilities.								The site has a high PTAL rating, which should facilitate car free residential development, reducing car dependence and its associated traffic and air pollution. The site is within an AQMA and should aim to be air quality positive due to being in the Wembley Growth Area. The site is bordered in the west and north by the Grade I Chiltern Railway line SINC linking a number of wildlife sites. Part of the site is susceptible to surface water flooding.											
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with good accessibility to a range of essential infrastructure. Mixed effects are predicted against environmental criteria, but mostly neutral. The site scores negatively against air quality as it is within an AQMA. The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. Development should adhere to London Plan and BGI1 requirements for the protection and enhancement of wildlife corridors. Developers will																			

	also be required to carry out a flood risk assessment and mitigations put in place if necessary. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Wembley Cutting North, Mostyn Road (BSWSA11)	-	+	++	+	++	++	++	0	+	0	0	--	0	?	-	0	-	+	+	+
Comments	The site is not within a London Strategic Area for Regeneration, however, it is subject to high crime rates. The site has good access to a wide range of goods and services being within immediate proximity to Wembley Central Town Centre, including key infrastructure such as healthcare and schooling.								The site has a good PTAL of 4 which should facilitate the implementation of a car free development, reducing associated traffic and pollution, improving air quality for which the site scored negatively. The site forms part of the railway trackside and is designated both as a Wildlife Corridor and a Grade I SINC. Development should be sympathetic to the ecological value of the site and adjacent greenspace which is also designated. The incorporation of green infrastructure within the design of the development will be essential in order to integrate the surrounding natural utility.											
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of new housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. The site's good PTAL score means car dependency should not be increased by occupants. Negative impacts are associated with the development of greenfield land which is designated as a Wildlife Corridor. Developments should ensure ecological utility of the site and the railway track wildlife corridor is not reduced, enhancing value where possible. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. In summary, development will increase intensity of use and potential negative impacts can be mitigated and wider sustainability benefits achieved.																			

Keelers Service Centre, Harrow Road, Wembley, HA0 2LL (BSWSA12)	-	+	++	+	++	++	-	0	+	0	0	--	0	?	0	0	+	+	+	-
Comments	The site is not within a London Strategic Area for Regeneration, however, it is subject to high crime rates. The site has good access to a range of amenities being within Sudbury Town Centre, with healthcare and sporting facilities within walking distance. The site is not within close proximity to a primary school with the nearest school being further than 500 meter away, therefore scoring negatively.								The site has a good PTAL of 4 being within close proximity to Sudbury and Harrow Road Station which should facilitate the implementation of a car free development, reducing associated traffic and pollution, improving air quality for which the site scored negatively. The site forms part of the Sudbury Neighbourhood Plan area. Development will therefore need to be in conformity with this, with any redevelopment proposals considering this forum.											
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of new housing in an area with good accessibility to a range of essential infrastructure, with the exception of schooling, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. The site's good PTAL score means car dependency should not be increased by occupants. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. In summary, development will increase intensity of use and potential negative impacts can be mitigated and wider sustainability benefits achieved.																			
Wembley Police & Fire Stations Harrow Road and Wembley Community Hospital/Chaplin Road Health	-	+	++	+	++	++	++	0	+	0	0	--	0	?	0	?	+	+	+	-

Centre (BSWSA13)																				
Comments	The site is not within a London Strategic Area for Regeneration, however, it is subject to high crime rates. Being within equidistance to both Sudbury and Wembley Central Town Centres, the site is well serviced with a range of goods and services, including key infrastructure such as the on-site health centre and a local primary and secondary school. Current uses to be retained and improved with a focus on reconfiguring the site to access more of its utility.								The site has a mixed PTAL with the majority of the site be designated as 6, with some sections designated 5, 4 and 2. Residential elements of the site should therefore aim to be car free, reducing associated traffic and pollution, improving air quality for which the site has scored negatively. The Police Station is a local heritage asset which should be retained if possible, with works being undertaken to enhance the utility of this asset. The site has some minor surface water flood concerns around the existing hospital building which may be easily overcome using appropriate design techniques.											
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of new housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. The site's good PTAL score means car dependency should not be increased by occupants. The on-site Grade II* listed heritage asset should be retained if possible, reducing any associated negative impact to local character, with the integration of new development to be sympathetic toward its design. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, development will increase intensity of use and potential negative impacts can be mitigated and wider sustainability benefits achieved.																			
Sudbury Town Station Car Park (BSWSA14)	-	+	++	+	++	++	-	0	+	0	0	--	0	?	-	0	-	+	+	+
Comments	The site is not within a London Strategic Area for Regeneration, however, it is subject to								Being within immediate proximity to Sudbury Town Station, the site has a good PTAL which should facilitate the implementation of a											

	high crime rates. The site is well served by a range of goods and services by virtue of its proximity to Sudbury Town Centre, this also includes the provision of healthcare. The site has scored negatively against proximity to schools, however, the site is located on the borough boundary and may therefore be served by facilities within the neighbouring borough.								car free development, reducing associated traffic and pollution, improving air quality for which the site has scored negatively. The site is adjacent to the railway tracks and constitutes part of a wildlife corridor. Any development on site should be sensitive to this fact, being sure not to reduce the ecological value of the corridor, integrating this natural utility into the sites redevelopment. The Station building itself is a Grade II* designated heritage asset. Development should take this into consideration, using the character of this building to help guide any new builds.													
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of new housing in an area with good accessibility to a range of essential infrastructure, with the exception of schooling, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. The site's good PTAL score means car dependency should not be increased by occupants. Negative impacts are associated with the development of greenfield land which is designated as a Wildlife Corridor. Developments should ensure ecological utility of the site and the area of the railway track wildlife corridor are not reduced, enhancing value where possible. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. In summary, development will increase intensity of use and potential negative impacts can be mitigated and wider sustainability benefits achieved.																					
Employment Land On Heather Park Drive (BSWSA15)	-	+	++	+	++	-	++	0	-	0	0	--	--	?	0	0	+	+	-	-		

Comments	The site is not within a London Strategic Area for Regeneration, however, it is subject to high crime rates. The site is not within close proximity to a town centre but is within immediate proximity to other strategic employment sites. There are healthcare and schooling facilities within walking distance of the site.								The site has a relatively poor PTAL rating of 2 and 3 which suggests redevelopment may require the provision of parking facilities which will increase car dependence, and associated traffic and pollution, reducing air quality for which the site has scored negatively. The site may benefit from the development of the Northfields site to the south which is set to improve links to Stonebridge Station, potentially increasing the PTAL for this site.											
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of new housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). This problem is exacerbated by the sites relatively low PTAL which is anticipated to increase vehicle dependence and associated traffic and pollution as it will likely require parking facilities. The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. In summary, development will increase intensity of use and potential negative impacts can be mitigated and wider sustainability benefits achieved.																			
Carphone Warehouse 416 Ealing Road (BSWSA16)	-	-	++	++	++	-	-	0	+	--	0	--	0	?	0	0	+	+	-	-
Comments	The site is not within a London Strategic Area for Regeneration, however, it is subject to high crime rates. The site should provide a significant uplift in residential units. The site is not within close proximity to a town centre, healthcare and schooling facilities. However, the site is within close proximity to the								The site has a good PTAL rating of 5 which should facilitate the implementation of a car free development, reducing associated traffic and pollution, improving air quality for which the site has scored negatively. The site is within 300 metres of the Veolia Transfer Station on Marsh Road. Development should therefore take this into consideration, using appropriate design techniques to mitigate any negative impacts associated with this proximity.											

	borough boundary and may be served by facilities in the neighbouring borough. The retail floorspace which is currently on site does not require to be retained entirely, with the primary aim of the site to be residential.																			
Conclusion	There are mixed impacts associated with social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area helping associated with high levels of crime, with access to open space and sporting facilities. Negative impacts are associated with low levels of access to key infrastructure such as town centres, healthcare and schooling. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. The site is within close proximity to a waste transfer station; negative impacts associated with this will need to be mitigated through appropriate design techniques. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. In summary, development will increase intensity of use and potential negative impacts can be mitigated and wider sustainability benefits achieved.																			
Former Wembley Youth Centre/Dennis Jackson Centre London Road HA9 7EU (BSESA17)	-	+	++	++	++	++	++	0	--	0	0	--	--	+	0	0	+	+	+	+

Comments	The site is not within a London Strategic Area for Regeneration, however, it is subject to high crime rates. The site should help bring forward approximately 150 residential units. The site is within close proximity to Wembley Central Town Centre and has good access to a range of goods and services, including healthcare and schooling. Redevelopment should ensure the reprovision of the community floorspace.	The site has a mixed PTAL of 1b, 3 and 4 and may therefore require the provision of parking facilities, increasing car dependence, and associated traffic and pollution, decreasing air quality for which the site has scored negatively. The surrounding land primarily consists of open space and should not be overshadowed under redevelopment.
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of new housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). This problem is exacerbated by the sites relatively low PTAL which is anticipated to increase vehicle dependence and associated traffic and pollution as it will likely require parking facilities. The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. In summary, development will increase intensity of use and potential negative impacts can be mitigated and wider sustainability benefits achieved.	

Appendix 1 - Baseline Information

1. Population and Equality

Evidence:

- 2001 and 2011 Census
- GLA Population Projections (Short-term), GLA, 2016
- GLA Population by Country of Birth, GLA, 2018
- GLA Housing lead ethnic group projections, GLA, 2016
- The Brent Joint Strategic Needs Assessment (JSNA), 2015
- London Borough of Brent Strategic Housing Market Assessment (October 2018)
- Equality Profile of Brent, Brent Open Data, 2019
- Population Change in Brent, Brent Open Data, 2019

Evidence Gaps

- None identified

- 1.1. The 2011 Census recorded Brent's population as 311,215, a 19.1% increase from the previous Census in 2001. Since the 2011 Census, the borough's population has continued to grow, with it estimated to be 335,300 as at 2019¹, which equates to a 7.2% increase since 2011. The current population density of the borough is 7652 people per square km. The population is expected to continue to increase to 2050, with it estimated that that by 2050 the population will be approximately 407,800², an increase of 20.25% from 2019.
- 1.2. The 2011, and estimated 2019, 2041 and 2050 ward populations are detailed in Table 7. In 2019, the most populated wards within the borough are Stonebridge, Queensbury, Tokyngton and Kilburn. The least populated wards within the borough in 2019 are Brondesbury Park, Northwick Park, and Kenton. In 2050, it is predicted that the most populated wards within the borough will be Alperton and Tokyngton, and the least populated wards will be Brondesbury Park, Welsh Harp and Kenton.²

¹Population Change in Brent, Brent Open Data, 2019

Ward	2011	2019	2041	2050
Alperton	14094	17200	29230	30688
Barnhill	15916	16650	19420	20263
Brondesbury Park	13097	13750	12847	13593
Dollis Hill	13504	14800	14154	14639
Dudden Hill	13504	16000	20241	21146
Fryent	13527	14650	15459	16087
Harlesden	17724	16950	16378	16979
Kensal Green	15013	15450	16297	17112
Kenton	12199	12400	14186	14767
Kilburn	17096	18550	18064	19151
Mapesbury	15621	16500	16295	17264
Northwick Park	12873	12800	15994	16895
Preston	15566	16300	17620	18385
Queens Park	15385	16300	14620	15520
Queensbury	15238	19600	22580	23541
Stonebridge	17007	19400	23039	23836
Sudbury	15044	16450	16529	17630
Tokyington	15188	18500	46057	47863
Welsh Harp	13840	14350	13708	14292
Wembley	14816	17300	21163	22087
Willesden	15686	16850	16185	17127

Table 6: Ward Populations

Gender

1.3. In 2019, 51% of Brent's population was male and 49% was female. As shown in Figure 4, it is predicted that there will no significant change in the borough's gender balance up until 2051.²

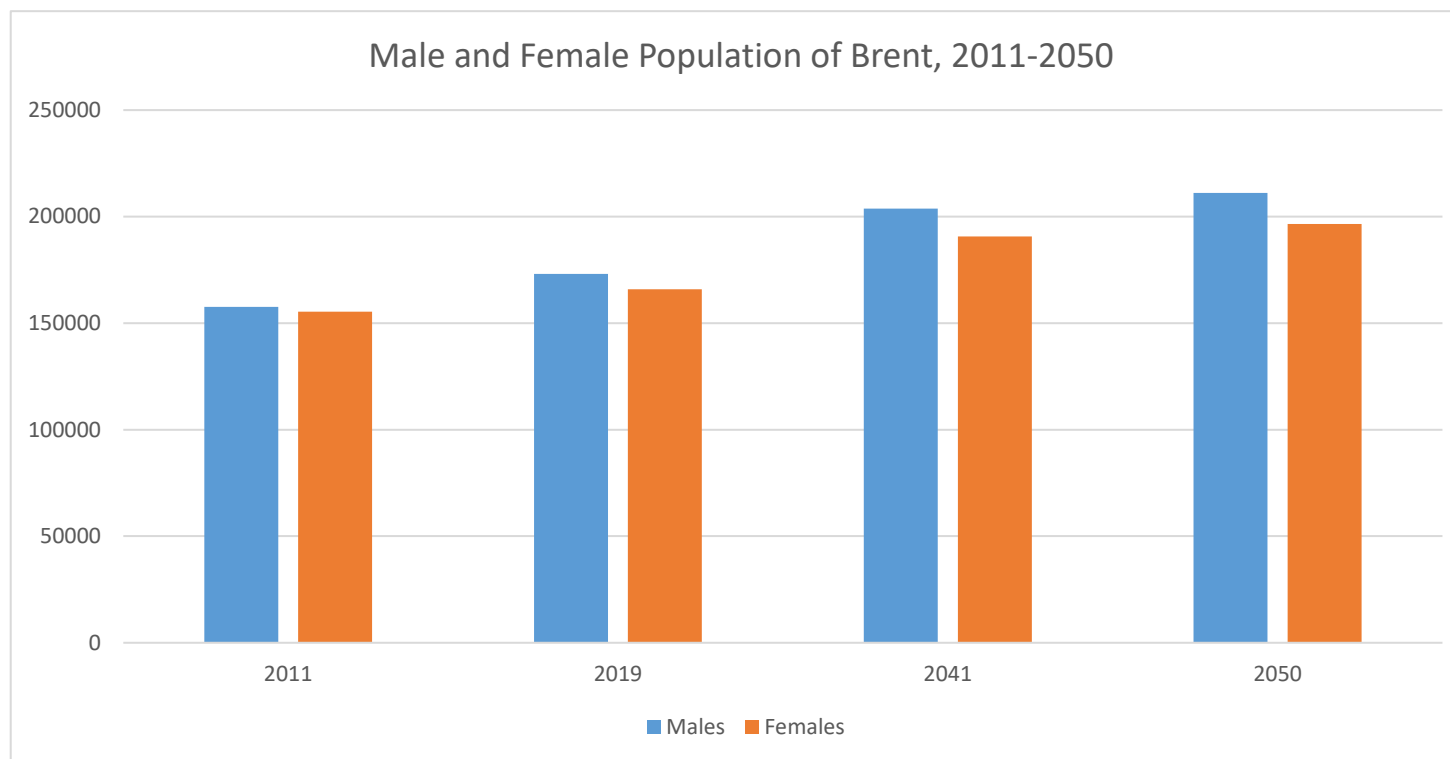


Figure 4: Male and Female Population within Brent

² GLA short term population projections, 2016

Age

- 1.4. Brent has a young population, with 32.4% aged between 20 and 39. This corresponds with London as a whole, which has a much higher proportion of its population within the age range of 25-34 than the rest of England. The working age (16-64 years) population of makes up 66.6% of the borough's population.³

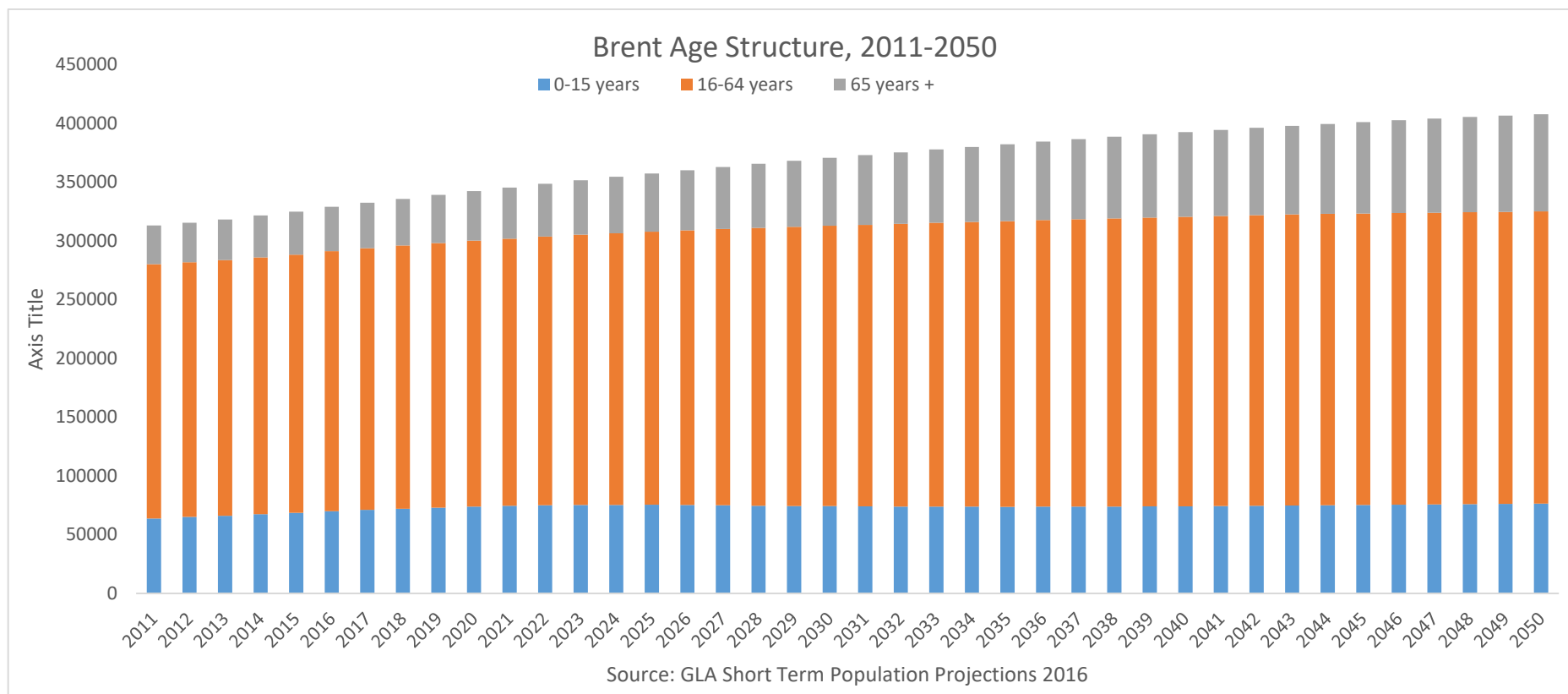


Figure 5: Brent's Age Structure, 2011-2050

³ GLA short term population projections, 2016

- 1.5. As at 2019, the 65 and over population (approximated to be 40,900 in total) makes up approximately 12.06% of Brent's population⁴. The 2018 SHMA stated that "whilst the increase in people aged 65+ represented is almost half of the overall population growth (46%), the increase in people aged 65+ represents over half (57%) of the household growth: 22,600 households out of the 39,500 total". This point is supported by the projected age structure of Brent in 2050.

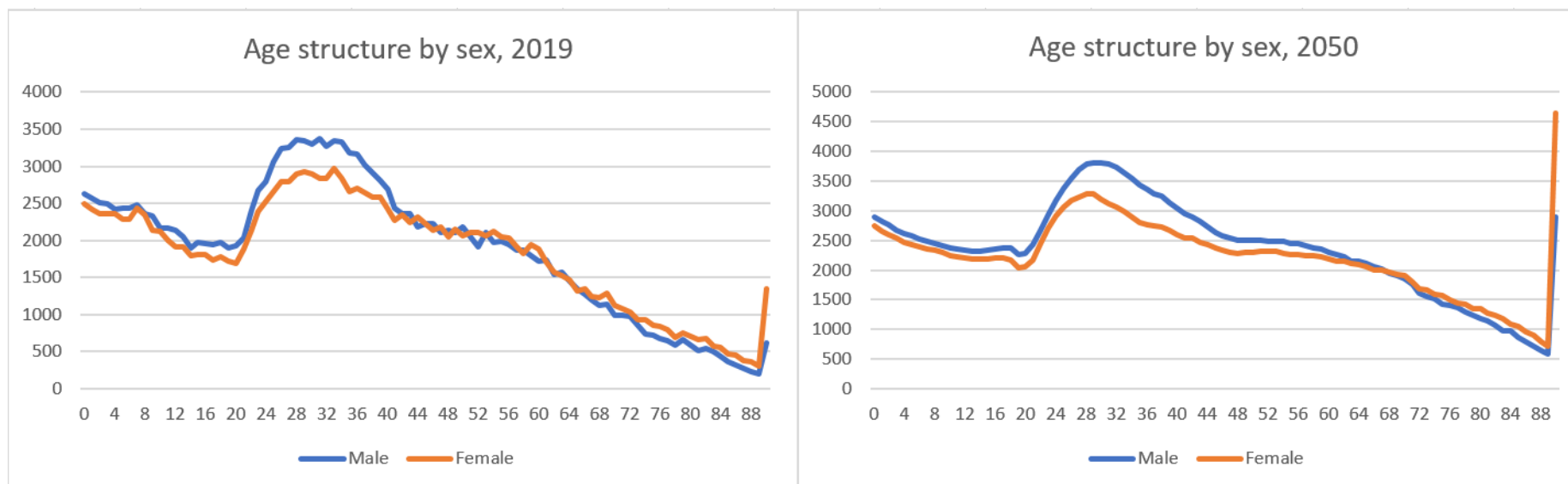


Figure 6: Brent's age structure, 2019-2050

Sexual Orientation

- 1.6. There is currently no single, widely accepted measure of the size of the Lesbian, Gay or Bisexual population in Britain and estimates vary considerably. According to the 2017 GP Patient Survey, 4.6% of Brent adults surveyed identified as Lesbian, Gay, Bisexual or Other. This percentage is below the London average (5.4%) but above the England average (3.3%). A recent study by Public Health England modelled estimates of the size of the LGB population based on data from 15 studies,

⁴ GLA short term population projections, 2016

and concluded that the percentage of LGB adults was at least 4.3% in London, with this figure to be considered a minimum.⁵

Gender Reassignment and Gender Identity

- 1.7. Statistics around transition and gender identify are limited. Estimates from the Gender Identify Research Education Society are that around 0.02% of adults may have undergone transition, or are receiving treatment (0.03%), and that 0.2% may seek treatment in the future. According to the Government Equalities Office, there are approximately 200,000 to 500,000 transgender people in the UK. This would equate to between 0.3-0.8% of the population in 2018. In Brent, this would equate to between 1000 to 2700 people.⁶

Pregnancy and Maternity

- 1.8. Brent has relatively high birth and fertility rates. In 2017, there was a birth rate of 15.8 births per 1000 population compared to 14.3 across London and 11.6 across England and Wales. This equates to the 4th highest birth rate in London and 6th highest in England and Wales. Additionally, Brent has a high total fertility rate (the number of children likely to be born to a woman in her lifetime if she were subject to the prevailing rate of fertility in the population). Brent has a Total Fertility Rate of 2.08 children, compared to 1.70 in London and 1.76 across England. This places Brent the third highest in London and 17th highest nationally.⁶

Marriage and Civil Partnership

- 1.9. According to the 2011 Census, as at 2011, 43% of Brent residents were married and 0.3% were in a civil partnership. Remaining residents were single (42%) or separated, divorced or widowed (14%). The proportion of residents in a civil partnership was lower than the London average of 0.4% and higher than the England average of 0.2%. There has been a decline in the number of people of the opposite sex getting married between 2012 and 2015, down from a high of 1681 to 931. This is in line with national trends. Of the 960 partnerships formed in 2015 in Brent, 3% were same sex marriages or civil partnerships, equating to 29. This 29 consisted of 23 same sex marriages and 6 civil partnerships. This is the same as the national percentage (3%), but lower than the London percentage (5%).⁶

⁵ Equality profile of Brent, Brent Open Data, 2019

⁶ Equality profile of Brent, Brent Open Data, 2019

Ethnicity

1.10. Brent is one of the most diverse local authority areas in the UK. In 2019, approximately 64.5% of Brent's population is Black, Asian or other minority ethnicity (BAME). This has increased since 2011, when BAME groups made up 63.7% of the population. The largest ethnic group within the borough is Indian, which consists of 17.4% of the population, followed by Other White (16%) and White British (15.9%) of the population.⁷

1.11. In 2018, it was estimated that 52% of the borough's population was born abroad. 15.2% were born in countries within the European Union, 20.67% for Asia and 15.2% from the rest of the world. Since 2007, there has been a slight decline in the proportion of the borough's population who were born outside of European Counties; in 2007 40% of the population born outside of the UK were born in non-European counties, compared to 36.78% in 2018. There has been an increase in the proportion

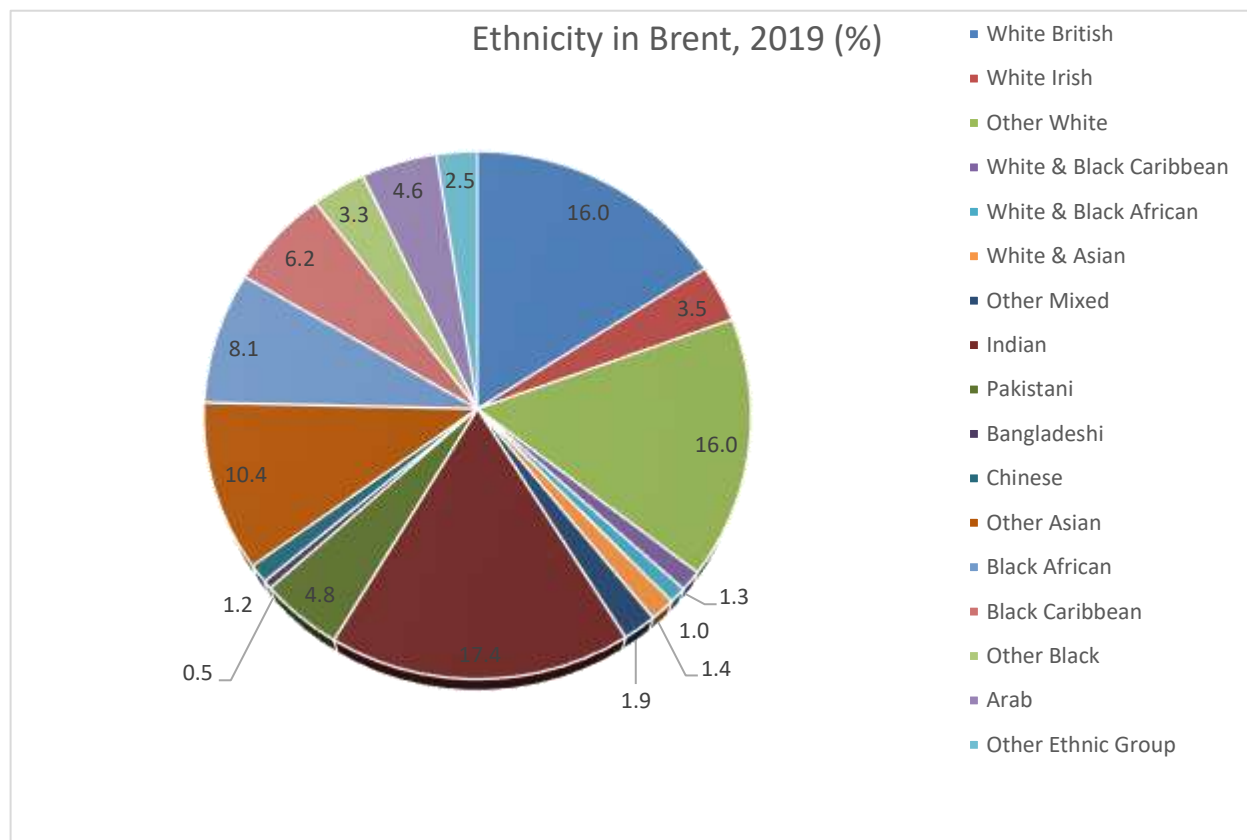


Figure 7: Ethnicity in Brent, 2019

⁷ GLA housing-led ethnic group projections, 2016

of the borough's population born within European countries; in 2007 10.99% of the population born outside of the UK were born in countries within the European, compared to 15.21% in 2018.⁸

1.12. The increasing population is likely to create changes in the ethnic make-up of the borough. As shown in Figure 8, it is predicted that large population increases within the borough will be within the 'Other White' and 'Other Asian' ethnic groups. It is also forecasts that there will be a slight decline in the borough's Black Caribbean and White Irish population.⁹

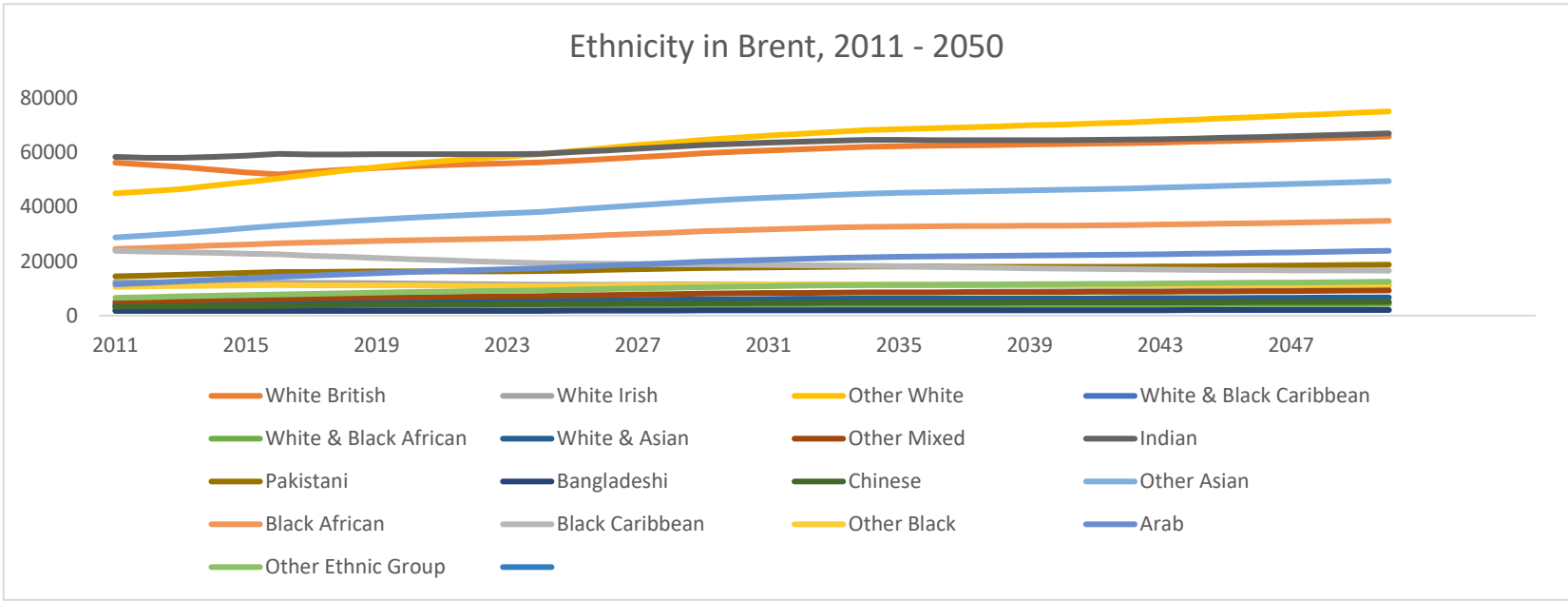


Figure 8: Ethnicity in Brent, 2011-2050

⁸ GLA population by country of birth, 2018

⁹ GLA housing-led ethnic group projections, 2016

- 1.13. There are 149 languages spoken in Brent. English is the main language for 62.8% of the population. Gujarati is the main language for 7.9% of the population and Polish is the main language for 3.4% of the population. Nearly 11% of adults speak English as their first language at home¹⁰.
- 1.14. According to the 2011 Census 14% of Brent residents had a long-term health problem or disability that limited their day-to-day activities in some way. More than half of all residents aged over 65 had a long term limiting health problem compared to 3% of children.
- 1.15. More recent survey data suggests that 16% of Brent residents between the ages of 16-64 are disabled according to the Equality Act 2010 and / or work-limiting definition. The prevalence of disability in Brent is similar to the London average (16% but lower than the national average (20%). This may be reflective of the fact that Brent and London populations have a younger age profile compared with Great Britain.¹¹

Religion or Belief

- 1.16. At the time of the 2001 Census, 48% of Brent's population stated that their religion or belief was Christianity. Although Christianity remained the most popular religion/belief in the borough in 2011, the percentage of the population that stated it was their religion had decreased by 7% to 41%.
- 1.17. Between 2001 and 2011, there was an increase in the amount of residents who stated that their religion or belief was Islam. As a result of this 7% increase from 12% to 19%, it replaces Hinduism as the second most popular religion/belief in the borough. During the same time period, there was a 2% decrease to 1% in the amount of residents who stated that their religion/belief was Judaism.
- 1.18. Compared with other areas, residents of Brent are more likely to have a religion. In Brent, 82% had a religion, compared to 71% across London and 68% nationally. This is the 4th highest rate in England and Wales. Just 11% had no religion.¹²

¹⁰ 2011 Census, ONS

¹¹ Equality profile of Brent, Brent Open Data, 2019

¹² Equality Profile of Brent, Brent Open Data, 2019

2. Education

Evidence Base

- Joint Strategic Needs Assessment, 2015
- Annual School Standards and Achievement Report 2017-2018
- Brent School Place Planning Strategy 2019-2023
- Statistics at Department for Education – Statistic: special education needs (SEN)
- Gov.uk data – All Schools and Colleges in Brent (2017-2018)
- Schools, Pupils and their Characteristics, Department for Education, January 2019

Infrastructure

2.1. As of March 2018, Brent's schools are organised as follows:

Type of School	Nursery	Primary	Secondary	All-through	Special	Pupil Referral Unity	Total
Maintained Community	4	31	0	0	2	2	39
Maintained Voluntary-aided	0	18	2	0	0	0	20
Maintained Foundation	0	2	0	0	0	0	2
Sponsored Academy	0	4	3	1	0	0	8
Converter Academy	0	4	7		2	0	14
Free School	0	1	1	0	0	0	2
Total	4	60	13	2	4	2	85

Table 7: Summary of Brent's Education Provision

2.2. The Brent School Place Planning Strategy states that Year 7 forecasts against current capacity identifies that an additional 13 forms of entry are needed to meet demand, with a need for additional capacity from 2019/20. The 'North Brent' Free School, planned to open in 2020, will help to meet demand until 2022/23, when a further 4 forms of entry will be required. The strategy suggests that this pattern suggests that expanding provision in existing secondary schools is the best option to meet additional capacity required beyond the 'North Brent' Free School.

School Population

2.3. Brent's school population has increased from 44,117 in 2011 to 51,524 in the year 2017-2018¹³. This represents an increase of 16.8%. In previous years, Brent has seen an unprecedented increase in the demand for primary school places, but as highlighted within the Brent School Place Planning Strategy, the trend changed in 2017 when the number of children admitted to Reception decreased for the first time in 11 years. Reception intakes are due to decrease further until 2021/22, when they will start increasing again.¹³ The demand for primary school places to 2023/2024 is detailed in Figure 9.

¹³ Gov.uk – Data on all schools and colleges in Brent, 2017-2018

		Rec	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6
2018/2019	Capacity	4,247	4,132	4,187	4,214	4,062	3,887	3,977
	Projections	3,706	3,671	3,802	3,882	3,789	3,673	3,694
	surplus/deficit	541	461	385	332	273	214	283
2019/2020	Capacity	4,277	4,247	4,132	4,217	4,214	4,062	3,887
	Projections	3,719	3,674	3,642	3,830	3,852	3,759	3,633
	surplus/deficit	558	573	490	387	362	303	254
2020/2021	Capacity	4,277	4,277	4,247	4,132	4,217	4,214	4,062
	Projections	3,707	3,676	3,634	3,638	3,792	3,813	3,710
	surplus/deficit	570	601	613	494	425	401	352
2021/2022	Capacity	4,277	4,277	4,277	4,247	4,132	4,217	4,214
	Projections	3,666	3,675	3,643	3,640	3,614	3,755	3,766
	surplus/deficit	611	602	634	607	518	462	448
2022/2023	Capacity	4,277	4,277	4,277	4,277	4,247	4,132	4,217
	Projections	3,727	3,675	3,673	3,679	3,643	3,609	3,735
	surplus/deficit	550	602	604	598	604	523	482
2023/2024	Capacity	4,277	4,277	4,277	4,277	4,277	4,247	4,132
	Projections	3,798	3,738	3,678	3,712	3,683	3,642	3,593
	surplus/deficit	479	539	599	565	594	605	539

Figure 9: Demand for Primary School Places 2018-2024 (Brent School Place Planning Strategy, 2019-2024)

2.4. Furthermore, the Strategy identified there has been a significant increase in demand for secondary school places since 2016, with the increased demand at primary stage now starting to move through to the secondary phase. Year 7 intakes are forecast to increase up until 2023/2024. Intakes are then set to reduce, although intakes will still remain higher than 2018/2019. As shown in Figure 10, by 2023/2024 an additional 13 secondary forms of entry will be required to meet

demand. The 'North Brent' Free School, due to open in 2020, will help to meet increased demand, and the pattern of demand suggests that expanding provision in existing schools is the best option to meet demand beyond the 'North Brent' Free School.

Year	Year 7 projected intake	Year 7 places available	Surplus/ Deficit of places	Surplus/ deficit %	Additional Forms of Entry (FE) required to ensure 5% spare places	Additional FE required with North Brent Free School providing 6FE from 2020	Cumulative FE required assuming places are provided as needed to meet demand
2018/19	3310	3478	168	5%	0	0	0
2019/20	3386	3508	122	3%	2	2	2
2020/21	3450	3508	58	2%	4	0	0
2021/22	3564	3508	-56	-2%	8	2	0
2022/23	3684	3508	-176	-5%	12	6	4
2023/24	3703	3508	-195	-6%	13	7	1
2024/25	3591	3508	-83	-2%	9	3	0
2025/26	3592	3508	-84	-2%	9	3	0
2026/27	3624	3508	-116	-3%	10	4	0

Figure 10: Demand for Secondary School Places

Educational Attainment

2.5. As identified within the Annual School Standards and Achievement 2017-2018, 96% of Brent Schools were judged good or outstanding, the same as in 2016-2017. This means that Brent is ten percentage points about the national average of 86%, and four percentage points above the London average of 92%. All nurse, special schools and pupil referral units were judged as being at least good.

Primary

2.6. In 2018:

- The proportion of pupils attaining the expected standard in reading, writing and mathematics at the end of Key Stage 2 was 63%, slightly below the London and national average;
- Similar to the last two years, Key Stage 2 average progress within the borough is above the national averages for reading, writing and mathematics, and above the London average for mathematics;
- A key issue continues to be the wide variation in the attainment of pupils at different primary schools, with the difference between the school with the highest proportion of pupils attaining the headline measure and the lowest being 74 percentage points.
- The Brent average for the proportion of girls attaining the expected standard in reading, writing and mathematics at Key Stage 2 was eleven percentage points above boys' attainment. Additionally, boys' attainment was three percentage points below the average for all boys nationally, and girls' attainment was one percentage point above the national average for all girls. ¹⁴

Secondary

2.7. The new headline measures for secondary schools are the Attainment 8 score and the Progress 8 score. Attainment 8 measures the performance of students across eight qualifications, which includes mathematics (double weighted) and English (English Baccalaureate).

- 2017/18 was the second year that revised GCSEs had been taken in English and Maths, and the first year for a further 20 subjects.

¹⁴ Annual School Standards and Achievement 2017-2018

- In 2017/18, Brent's Progress 8 score was 0.54 – this means that on average, Brent students made over half a grade more in progress in each of their eight subjects than students nationally (-0.02). This is also above the average progress made by students in London (0.17).
- Brent's Attainment 8 score was 49.8 in 2018, above the London average of 46.4. The overall attainment in 2017/18 is lower than in 2016 due to the introduction of the revised GCSE.
- In 2017/18, the Brent average Attainment 8 score for girls was 4.5 points above boys'. Boys' attainment was four points above the average for all boys nationally and continued to be above the national average for all students¹⁵

Post-16 Key Stage 5

2.8. The statistics for Key Stage 5 cover all state-funded mainstream schools, Academies, free schools, maintained special schools and further education colleges. Students are able to study a variety of different qualifications at Key Stage 5, which includes: A Levels, Applied General and Tech Level.

2.9. In 2018, the average A Level average point score per qualification was 33, slightly lower than 2017. This is higher than the London average (32) and in line with the national average (33). Therefore, on average, Brent students attained a grade C in each of their three A Level subjects.

2.10. Brent students attained an average grade of C (30 points) in Applied General qualifications, which is above both national and London averages (28 and 29 respectively). Applied General qualifications have been revised and their assessment made more challenging, which makes it difficult to compare the 2018 results with previous years.

2.11. For Tech Level courses, Brent's average point score was 36, which is well above the national and London averages (28 and 29 respectively).

¹⁵ Annual School Standards and Achievement 2017-2018

Ethnic Groups

2.12. The largest ethnic groups of statutory school age are: Asian Indian (17%), Black Somali (9%), White Eastern European (9%), Black Caribbean (7%), White British (6%), Asian Pakistani (6%), and Asian Sri-Lankan (3%). Brent schools experience high levels of mobility and in-migration with a large proportion of under 6s born outside of the UK (19%).¹⁶

Special Educational Needs (SEN)

2.13. As of 2018, there were three specialist nurseries, four Special Schools and a number of Additionally Resourced Provisions and SEN Units in both primary and secondary mainstream schools.¹⁶ As identified in the School Place Planning Strategy, the demand for specialist SEN places is increasing in part in proportion to the overall rise in pupil numbers, but also due to increased diagnosis.

2.14. As of January 2018, there were 2076 (SEN2 Return) Brent resident children and young people with an EHCP (Education Health and Care Plans), of whom 1900 were attending a school and 176 were attending a further education provision. 4% of children and young people resident in Brent have an EHCP, compared to 2.9% of the national school-age population.⁴ The most common type of EHCP need within current school age children is Autistic Spectrum Disorder, followed by Moderate Learning Difficulties, and then Speech, Language and Communication Needs.¹⁶

¹⁶ Brent School Place Planning Strategy, 2019-2024

3. Health and Well-Being

Evidence

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

Evidence Gaps:

- None identified

- 3.1. In Brent, life expectancy for female between 2016 and 2018 is 85.1 years. This was higher than male life expectancy which is 80.8 years. However, life expectancy across the borough varies for males and females – life expectancy is 6.9 years lower for men and 6.4 years lower for women in the most deprived areas of Brent than in the least deprived areas.¹⁷
- 3.2. At the time of the 2011 Census, the vast majority of people in Brent (83%) described their health as “very good” or “good”, a similar picture to England and Wales as a whole (81%). 5% described their health as “very bad” or “bad”, with the remaining 12% saying that their health is “fair”. At ward level, Kilburn had the highest number of residents who assessed their health as “very good” (8,448 residents) while Kenton had the lowest number of residents (5,502 residents) that assessed their health as “very good”. Harlesden had the highest number of residents with both “good” health (5,815 residents) and those reporting “very bad” health (313 residents)
- 3.3. The Joint Strategic Needs Assessment, which was jointly commissioned by Brent Council and NHS Brent, identified a number of health and wellbeing challenges in the borough, which are:

¹⁷ Local Authority Health Profile – Brent, 2019

- **Low rates of readiness for school amongst under-fives** – In Brent, only 57% of 5-year olds reach a good level of development at age 5, compared to 59% across London.
- **Poor oral health amongst children** – 46% of five year olds had one or more decayed, missing or filled teeth. This is worse than the England average of 28%.
- **Rising levels of obesity** – The proportion of obese reception children within Brent in 2017 is higher than the London and England average. The proportion of children who are obese in year 6 in Brent has been increasing since 2013, and remains higher than the London and England average. Figures from the Health and Social Care Information Centre show that in 2017 there were 36 hospital admissions per 100,000 for episodes with a primary diagnosis of obesity, which is significantly higher than the England average of 19. Furthermore, the projected levels of obesity is projected to increase by 50% – between 2014 and 2030 the number of people in Brent aged 65 and over and who are obese is predicted to rise from 9,194 to 13,692.
- **Low levels of participation in physical exercise** – Brent is a borough of low activity and high inactivity. 3 in 10 Brent adults are classified as inactive in the latest release of the Active Lives Survey by Sport England. This is considerably higher than the national average of 25.7%. Out of 326 local authorities that are measured in England, Brent ranked 269th for the proportion of Active People and 283rd for the proportion of inactive people. The Sport England Active Places Small Area Estimates for 2017 show that there are areas of high inactivity in and around the Stonebridge, Alperton, Welsh Harp, Barnhill and Wembley Central wards, with more active areas clustered around the south east of the borough in Queens Park, Brondesbury Park, Kensal Green and Mapesbury. As identified in the Physical Activity Strategy for Brent, there has been some increase in women taking part in sport and exercise between October 2005 and April 2014, however there is still a gap between men's and women's participation in sports.
- **Increasing rates of alcohol-related hospital admissions** – The rate of alcohol-related harm hospital stays is 561 per 100,000 population, which is better than the average for England. This is equivalent to 1,554 stays per year. In 2017, the NHS recorded that 109 per 100,000 population had prescription items for the treatment of alcohol dependence, which is lower than the England average of 335 per 100,000.

- ***Mental health remains the single largest cause of morbidity within Brent affecting one quarter of all adults at some time in their lives*** – In Brent, 33,959 people aged 18-64 were estimated to have a common mental health disorder (CMD) in 2014As shown in Figure 11, by 2030 it is predicted that the number of people with a common mental disorder will increase by 7% to 36,625 people. The Figure shows that there is also greater prevalence of CMD within the female population of the borough compare to the male; in 2014 it was estimated that 20,409 female residents of the borough had a CMD compared to 13,550 male residents.

The prevalence of severe and enduring mental health (such as schizophrenia, personality disorders and bi-polar) in Brent affects 1.1% of the population, which is above both the London (1%) and England (0.8%) average.

- **Cardiovascular disease, chronic respiratory disease and cancers are the biggest killers in Brent and account for much of the inequalities in life expectancy within the borough**
- **The borough has high levels of long-term chronic conditions, many of which are often related to poor lifestyles, relative deprivation and in some cases ethnic make-up. Diabetes is a good example of such a conditions and the borough** – 10.5% of residents are living with diabetes and are at risk of a range of complications, such as kidney disease, heart disease and loss of sight. The prevalence of diabetes is projected to rise in Brent with it estimated in 2030 that 14% of people aged 16 and over will have diabetes. This is fuelled by the ageing population, increasing numbers of people who are overweight or obese and the high proportion of black and south Asian ethnic groups in the borough who are more at risk of diabetes.
- **The need to increase access to, and to expand, key prevention and screening programmes**

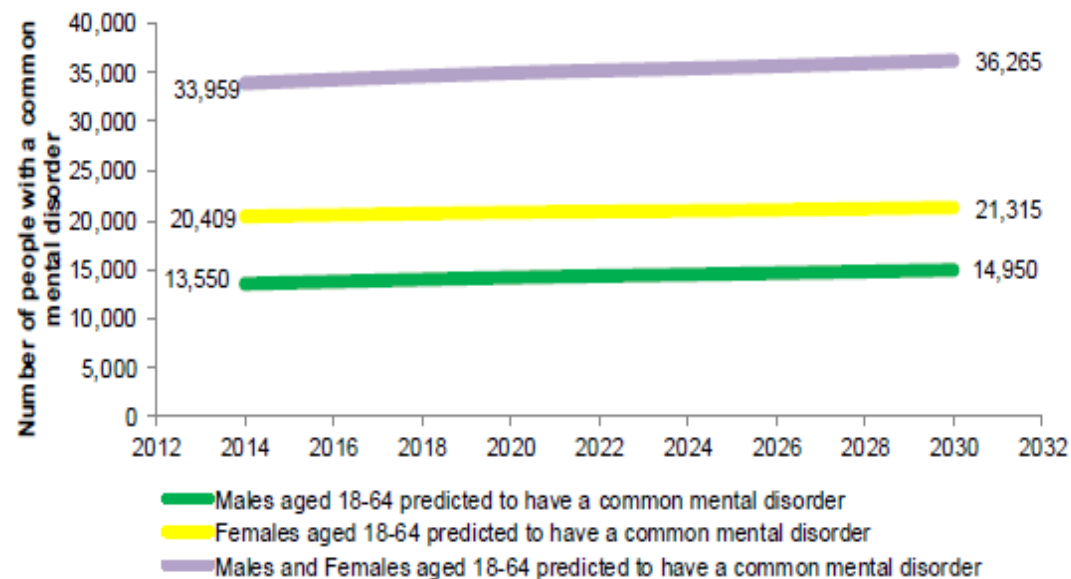


Figure 11: Number of people with a common mental disorder

- **Rising levels of dementia amongst older adults** – In March 2015, 1,381 patients (55.1%) in NHS Brent CCG had mild dementia, 818 patients (32.7%) had dementia of a moderate severity, 306 patients (12.2%) had severe dementia and 730 people remained undiagnosed. The prevalence of dementia varied at GP practice levels, ranging from 1.12% to 0.03%. Between 2014 and 2030, the total population age 65 and over in Brent estimated to have dementia is projected to rise from 2,369 to 3,857. This equates to an increase of 63%.

3.4. The JNSA also identified the following facts about the health and wellbeing of Brent's residents:

- 47.1% of the population in Brent were meeting the recommended 5-a-day fruit and vegetable intake in 2014. This was below the London (50.3%) and England (53.5%) average.
- 31.4% of Brent's population who are aged 16 and over abstain from alcohol use, almost twice the national average of 16.5%.
- In 2012-14, the TB incidence rate in Brent was 82.9 per 100,000 of the population. This was significantly above the England average rate (13.5 per 100,000) and London average (35.4 per 100,000).
- Brent has 30,616 households with people living on their own (according to 2011 Census). Of these, 29% (8,808) are age 65 and over. Social isolation, loneliness and higher levels of deprivation are all linked with pensioners who live alone. As identified in the JNSA, the number of older people in Brent aged 65 and above is anticipated to increase to 52,900 in 2030, which is equivalent to an increase of 47%. Given this projected rise, the number of people in Brent aged 65 and over who are likely to be affected by social isolation and loneliness is forecast to increase significantly
- The General Fertility Rate (GFR) is the number of live births per 1,000 population for women aged between 15 to 44. The GFR in Brent in 2017 was 74.5, higher than the Outer London (69.8) and national (61.0) average. This reduced to 68.1 in 2018, compared to London (60.0) and England (59.2). This means that the GFR has declined in recent years, both in Brent and nationally.¹⁸

3.5. In November 2017, the number of FTE GPs working within Brent (excluding locums) was 160.42.

¹⁸ Brent Open Data – Population Change in Brent (2019)

- 3.6. The current care provision within Brent is 67 GP practices, 66 dental practices, 75 pharmacies and 16 nursing homes. London North West Healthcare and NHS Trust and Imperial College Healthcare NHS Trust are the main providers of acute and specialist care. London North West Healthcare NHS Trust also provides community nursing and therapies. Central North West London (CNWL) Foundation Trust is the main provider of mental health services. 4 networks have been set up (which comprises of Brent GP's) to deliver extended primary care and Out of Hospital Services for the Brent population.

4. Crime

Evidence Base

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

Evidence Gaps:

- None identified

4.1. The Community Safety Strategy outlines how the Council will seek to mitigate crime, abuse and disorder that occurs within Brent. It identifies the following strategic intentions:

- Reducing Domestic and Sexual Abuse
- Reducing the impact of gangs and/or knives in our community
- Reducing vulnerability and increasing safeguarding
- Reducing offenders and perpetrators from reoffending
- Reducing anti-social behaviour (ASB)

4.2. In 2018/19 the number of crimes within Brent increased by 3.1% over the past 12 months. However, despite this increase Brent's crime rate per 1,000 of the population is below the London average.

4.3. There has been a rise in some Anti-Social Behaviour (ASB) and gang-related offences. Gang and knife crime remains a key obstacle for the borough, and is a key focus of the 2018-2021 Strategy.

Reducing Domestic and Sexual Abuse

4.4. Brent had the 5th highest number of reported domestic abuse (DA) crimes in comparison to the most similar London Boroughs in the year 16-17. In the year up to September 2017 there were over 144,000 incidents, of which 76,000 were notifiable offenses (33% of all notifiable offenses). Of these offenses, 76% related to the victimisation of women and 24% to the

victimisation of men. Brent had the third highest number of violent domestic abuse crimes, which had increased by 7.5% within a twelve-month period.

4.5. There has also been an increase of 1,600 in recorded Sexual Offenses in the 12-month period up to September 2017. Rape offenses have also increased by 19% over the same time period. During the same time period, 86% of sexual violence victims are women, and 14% are men.

4.6. Domestic Abuse hotspot areas within Brent (2017-2018) are shown in Figure 12. The hotspots identified included Harlesden Town centre, Wembley Central, Church End Estate and Stonebridge Estate. These locations have also been identified for ASB and Gang Activity.

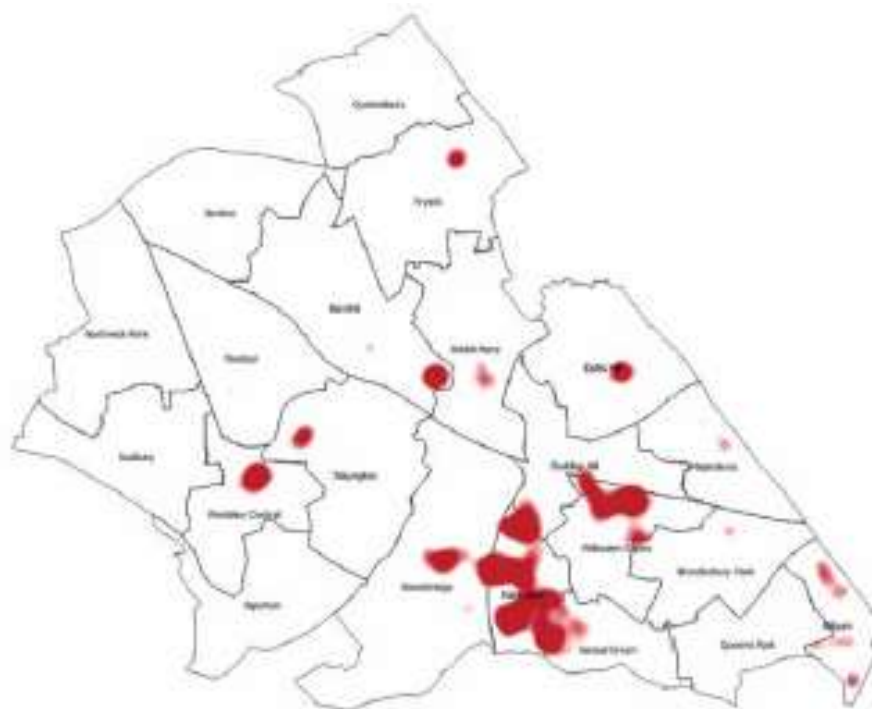


Figure 12: Domestic Abuse hotspots

Reducing the impact of gangs and/or knives in our community

- 4.7. Brent has recorded an increase in the gang relating offending, including: firearm discharges; stabbings; and young people being exploited by gang nominals and organised crime groups. Based on local knowledge and the Metropolitan Police gang matrix, there are currently 22 gangs within the borough. There are estimated to be over 1,000 known individuals involved with gang criminality within Brent, of which 288 have been identified by the current Metropolitan Police Gangs Matrix. The strategy states that Brent gang's cohort is over 90% male, 80% black and has an average age of 24 years old. The highest gang risk areas within the borough is Church Road/Church End Estate, Stonebridge Estate and South Kilburn Estate
- 4.8. As at 18/19, emerging gangs in Kingsbury, Wembley, Neasden and Willesden are now the main problem profile in Brent. These cohorts are often not on the gangs matrix with evidence to show that more established gangs on the matrix are across county lines.¹⁹
- 4.9. The year ending 16/17 saw a rise in knife injury within Brent, with 87 victims, an increase of 3 compared to the previous 12 months (15/16), as shown in Figure 13 below. However, according to the Safer Brent Partnership Annual Report 2018/19, the 18/19 year has seen a reduction of 13% in knife crime offences, and there was only one knife related murder which was not gang-related.

¹⁹ Safer Brent Partnership Annual Report 2018-2019

4.10.

4.11. Stabbings incidents have occurred across the borough, however there are four main hotspots: Harlesden Town

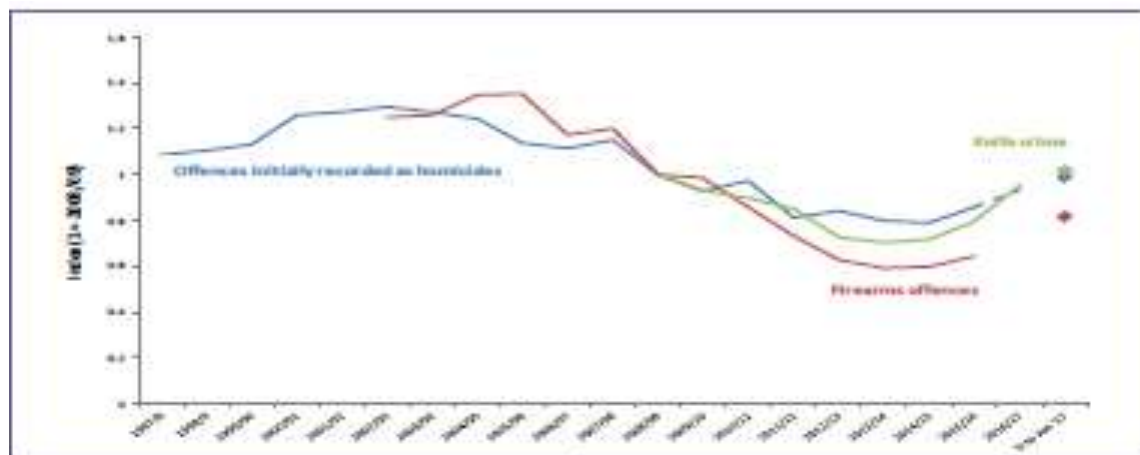


Figure 13: Knife and Gun crime within the borough (to Jun 17)

ermore, in 2018/19 Brent has the third highest number of semi-automatic gun discharge incidents (51) when compared to the most similar boroughs. This is an increase of 12.5% from the previous year.²⁰

Reducing Vulnerability and Increasing Safeguarding

4.12. In Brent Council has developed the Brent Community MARAC (MARAC), which is a multi-agency panel meeting which shares information on high-risk cases to vulnerable individuals and put in place a risk management plan to address the safety and protection of those victims.

²⁰ Safer Brent Partnership Annual Report 2018-2019

- 4.13. There has been a 52.58% reduction in risk in the Community MARAC cases in the 18/19 year. There was a range of vulnerabilities identified within the cohort, which included mental health, substance misuse, repeat victim/perpetrator, physical disability, forensic history, vulnerable minority e.g. religious, political, cultural, learning disability and homelessness.
- 4.14. Nearly 80% of all hate crimes within the borough are based on race, religion/faitth or ethnicity. In Brent, over a 12-month period (up to August 2017) there was a total of 779 hate incidents recorded, which involved 816 victims. Brent has the second highest number of reported Islamophobic incidents in comparison to similar London Boroughs over a 12-month period, which is an increase of 18.8% from the previous 12 months.
- 4.15. Analysis has also highlighted that Child Sexual Exploitation (CSE) as a high-risk, high harm issue. As identified in the community safety strategy, in the year to 2017 there were 25 non-crime CSE reports and 24 crime reports which have a CSE flag. The peak age of CSE victims in Brent is 15 years old.

Reducing Anti-Social Behaviour (ASB)

- 4.16. In the year ending 18/19 Brent had received the third highest number of ASB calls in comparison to most similar London boroughs, an increase of 0.1% from the previous 12 months. Brent was one of the only two boroughs that saw an increase in ASB calls out of the most similar group. Brent's ASB recorded data for December 2016 to December 2017 has shown the top three repeated categories to be open rug markets, rough sleeping and street drinking. ASB hotspots within the borough have been identified in Figure 14.

4.17. The Resident's Attitude Survey, carried out by Brent Council in 2018, found that 47% of the surveyed population felt fairly safe walking outside in their area alone after dark, with 15% feeling a bit unsafe and 10% feeling very unsafe. Since 2002, there has been a significant reduction in percentage of people who feel very unsafe walking outside alone after dark, decreasing from 24% in 2002 to 9% in 2014 and back up slightly to 10% in 2018.

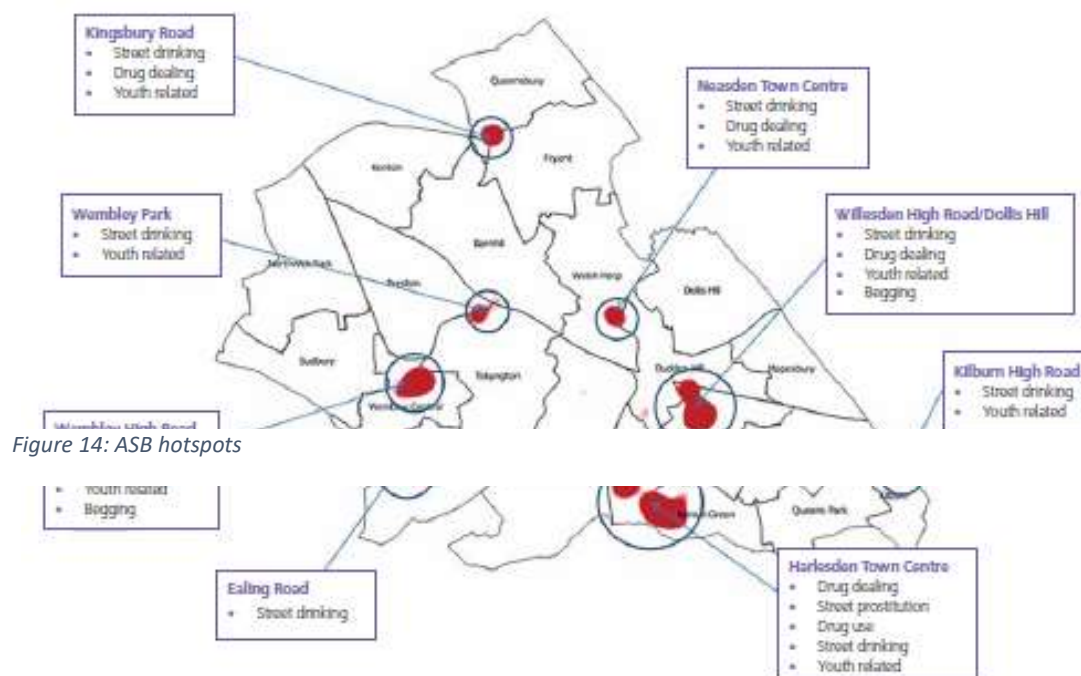


Figure 14: ASB hotspots

5. Water

Evidence

- West London Strategic Flood Risk Assessment – Level 1
- Strategic Flood Risk Assessment - Level 2
- Surface Water Management Plan, 2011
- Brent Flood Risk Management Strategy
- Brent River Corridor Improvement Plan, Brent Catchment Partnership, 2014
- Thames River Basin Management Plan, Environment Agency

Evidence Gaps

- Water consumption per household

5.1. Brent's Blue Ribbon Network (Figure 15) includes the following water bodies:

- The River Brent - one of the main rivers that flows through the borough.
- Grand Union Canal - runs along the south-western boundary of the borough with a connecting feeder channel running from the Welsh Harp reservoir to the north east of the borough
- Welsh Harp Reservoir - also referred to as the Brent Reservoir, this water body forms part of an SSSI and supports a large selection of wetlands birds and plants.

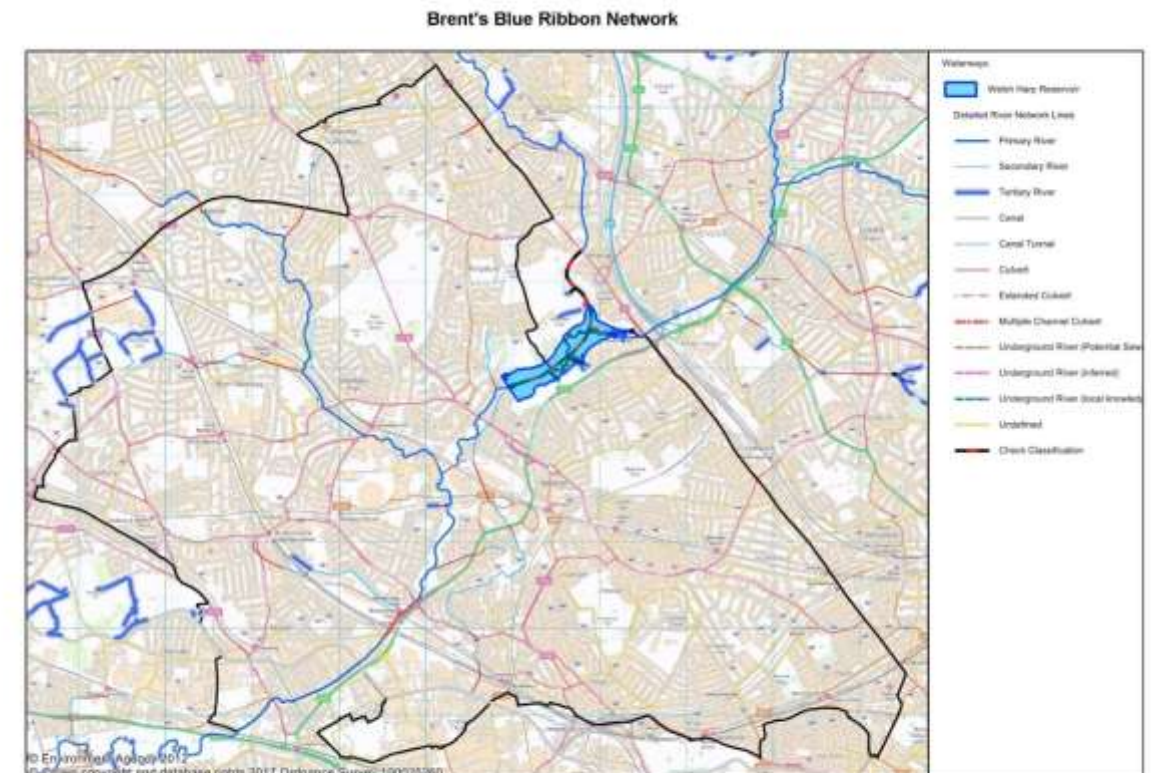


Figure 15: Brent's Blue Ribbon Network

5.2. Other tributaries which play an important role in Brent's network of waterways includes:

- Wealdstone Brook - runs through the London Borough of Harrow to the north of Brent on to its confluence with the River Brent near the centre of the Borough. The Wealdstone Brook responds very quickly to rainfall and has had several flooding incidents over the last 30 years, particularly due to the foul sewerage system backing up as a consequence of being overloaded with surface water.
- Brent Feeder Canal – an artificial watercourse
- Dollis Brook - the starting point, and a tributary, of the River Brent.

5.3. The Water Framework Directive is a European Union Directive which commits all member states to achieving a 'good status' for all water bodies. As identified in Table 9, the rivers, lakes and canals within the Brent catchment are achieving a 'moderate' status. This status is primarily due to pollution and physical modification from urban development, transport and the water industry.

Water Body	Length	Type of Water Body	Overall Water Body Classification (2016 Cycle 2)
Welsh Harp	n/a (catchment area is 38.5ha)	Reservoir	Moderate
Wealdstone Brook	7.907km	River	Moderate
Silk Stream and Edgware Brook	16.258km	River	Moderate
Lower Brent	20.475km	River	Moderate
Dollis Brook and Upper Brent	16.986km	River	Moderate
Bentley Priory	n/a (catchment area is 63.75ha)	Lake	Moderate
Brent Feeder Canal	4.857km	Artificial Canal	Moderate
Grand Union Canal	45.496km	Artificial Canal	Moderate

Table 8: Status of Brent's waterbodies

5.4. The Brent Catchment Partnership, an informal group of organisations who are committed to improving the rivers in the Brent catchment, have prepared the 'Brent Catchment River Improvement Plan' which seeks to *"improve and enhance the rivers within the Brent Catchment, making them cleaner, more accessible and more attractive, to benefit local communities and wildlife"*. To achieve this, the document identified a number of objectives, which included:

- By 2021, water quality in the Brent catchment has improved and has a 'moderate' ability to support wildlife
- To transform up to 10 kilometres of heavily modified river to a more natural condition by 2021

5.5. The West London Boroughs of Brent, Barnet, Ealing, Harrow, Hillingdon and Hounslow jointly commissioned a Level 1 Strategic Flood Risk Assessment, which was completed in 2018. The SFRA identified areas within all boroughs that were at risk from all sources of flooding and provided recommendations which would reduce the risk of flooding to residents and buildings.

5.6. The SFRA identified that the following areas within Brent are at risk of fluvial flooding (Figure 16). The areas at risk are predominantly within proximity to the borough's watercourses, in particular the River Brent, Welsh Harp and Wealdstone Brook. There are also areas within the Stonebridge Ward which are at risk of fluvial flooding.

5.7. Furthermore, the SFRA identified areas within the borough which are in the functional floodplain. Flood Zone 3b is defined as 'land within EA modelled fluvial and tidal flood risk extents predicted for up to and including 1 in 20 year return period events allowing for the

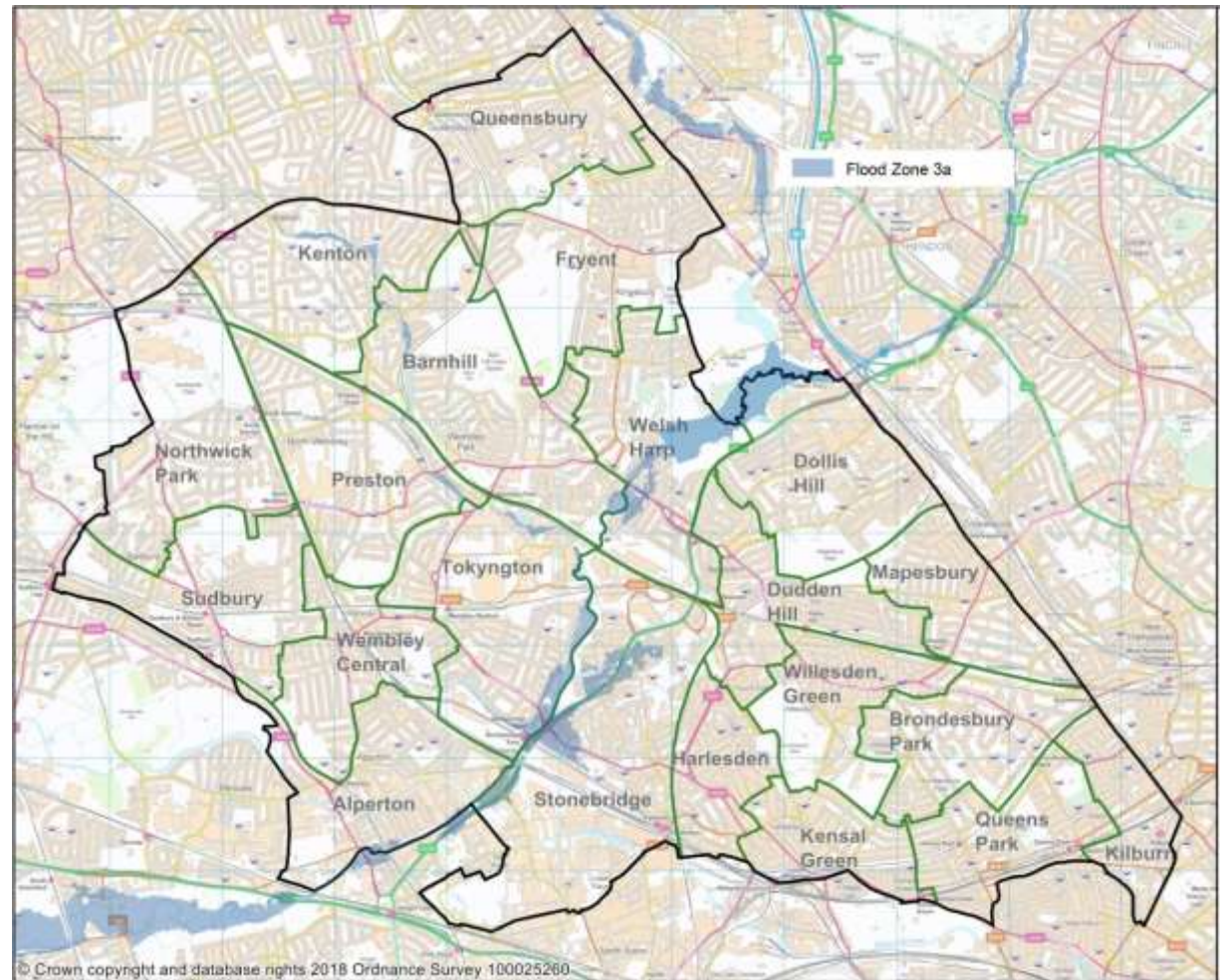


Figure 16: Areas at risk of fluvial flooding

impact of flood defences' and 'land which is included within the EA's storage areas dataset'. Areas of functional floodplain within Brent are concentrated around the River Brent.



Figure 17: Areas of Brent within functional floodplain (Flood Zone 3b)

5.8. The Joint West London SFRA defined Flood Zone 3a – Surface Water as 'Land within EA modelled surface water flood risk extents predicted for up to an including 1 in 100 year return period events'. As shown in Figure 18, there are a number of areas across the borough which are at risk to surface water flooding. Areas which appear to be particularly susceptible to surface

water flooding is the borough's road network. According to the Environment Agency's property count for their national Flood Map for Surface Water (FMfSW) dataset, approximately 35,500 residential properties and 4,400 non-residential properties in Brent could be at risk of surface water flooding of greater than 0.1m (10cm) depth during a rainfall event within a 1 in 200 probability of occurrence in any given year.

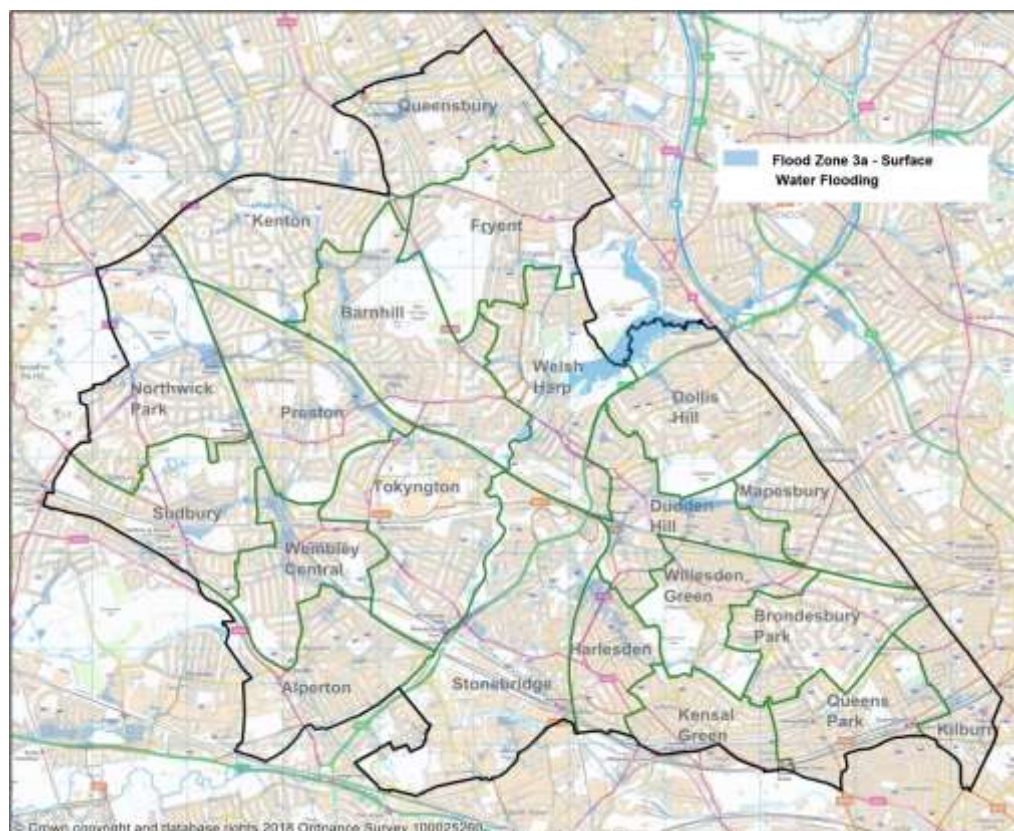


Figure 18: Areas of risk of surface water flooding

5.9. Furthermore, as identified in the Government's preliminary flood risk assessment for Brent (reviewed in 2017), there has been few flooding incidents within the borough. Most of the flooding within the borough is due to inadequate capacity in the Brent North Catchment and a drainage study is in progress to identify the problems and locations.

5.10. There are no groundwater Source Protection Zones within Brent.

5.11. The borough's Surface Water Management Plan (SWMP) identified 27 Critical Drainage Areas (CDAs) (Figure 19), a number of which are cross-boundary. A CDA is "a discrete geographic area (usually a hydrological catchment) where multiple and interlinked sources of flood risk (surface water, groundwater, sewer, main river and/or tidal) cause flooding in one or more Local Flood Risk Zones during severe weather thereby affecting people, property or local infrastructure".

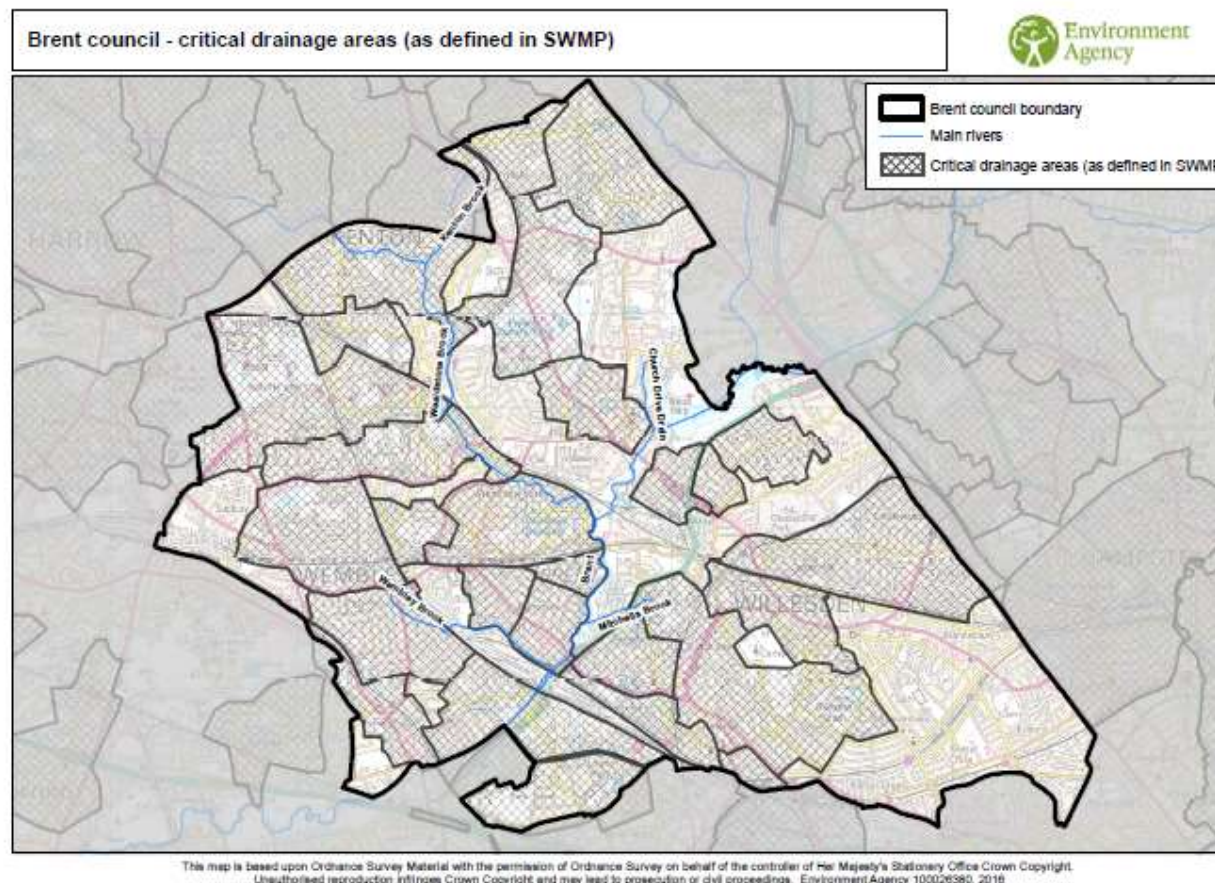


Figure 19: Critical Drainage Areas (CDAs) within Brent

- 5.12. The Council's SWMP also identified that within Kenton, Northwick Park and Preston Road surface water flooding is likely to be caused by pluvial, sewer and groundwater flooding
- 5.13. The Thames Water Storage Utilisation model has mapped sewerage capacity across London. As shown in Figure 20, within Brent there are areas of limited capacity, particularly within the northern and western region. It is predicted that sewerage capacity within the western region of the borough will be at capacity by 2050.

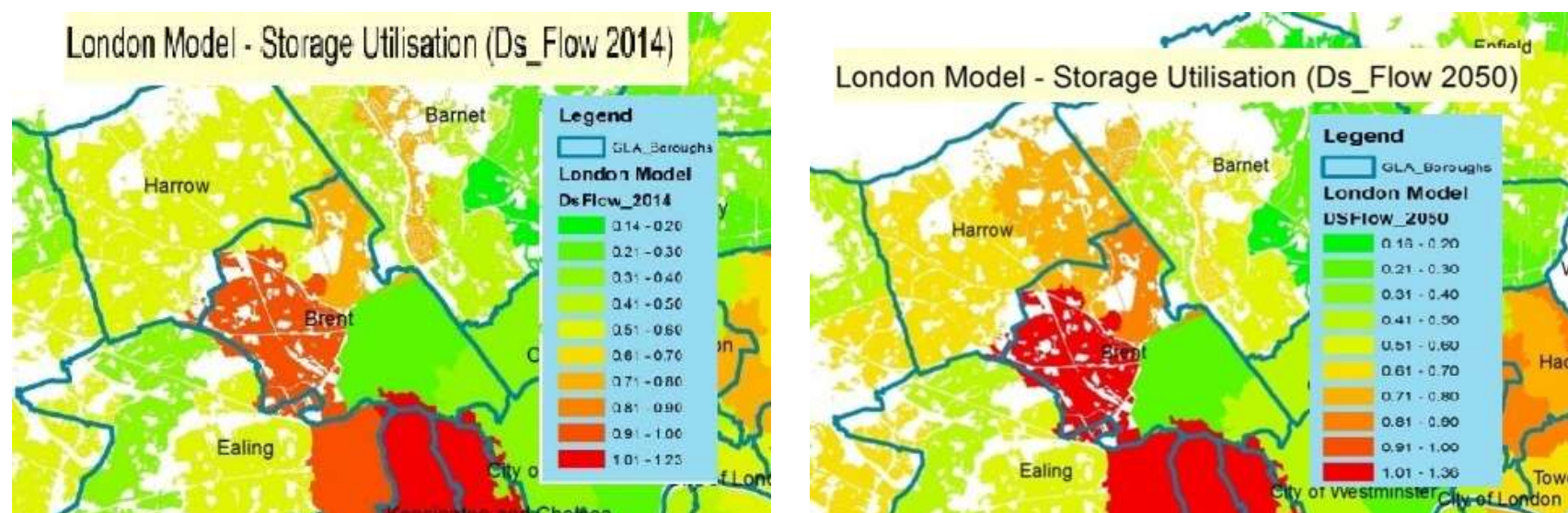


Figure 20: Storage capacity within Brent, 2014 and 2050

6. Air Quality

Evidence

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

Evidence Gaps

- None identified

6.1. Brent meets all the national air quality targets except for two pollutants – Nitrogen Dioxide (NO₂) and Particulate Matter (PM₁₀). In the areas where these targets have not been achieved, the Council has declared an Air Quality Management Area (AQMA). The borough's AQMA is depicted in Figure 22. Air quality outside of the AQMA has not worsened since 2006.

- 6.2. The largest contributors to poor air quality in Brent are local energy generation, construction and road transport. Traffic and transport is the largest contributor to air pollution in Brent, accounting for at least 52% of emissions in the borough. Emissions from local energy generation account for 15% of the NO_x emissions across London. In addition, it is likely the building works will continue to be a key source of pollution in the short, long and medium term as the Council plans to build a significant amount of homes to achieve the London Plan target, unless it is properly controlled.
- 6.3. In the Air Quality Action Plan 2017-2022, the Council created four Air Quality Action Areas (AQAA) at Neasden Town Centre, Church End, the Kilburn Regeneration Area and Wembley and Tokyngton. A specific action plan will be created for each area which includes actions on how to address the main sources of pollution. In addition, for these areas the Council will develop strategic policies and localised focussed air quality measures.



Figure 21: Air Quality Management Area (AQMA) within Brent

7. Soils and Geology

Evidence:

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

Evidence Gaps:

- None identified

7.1. The geology of Brent consists predominantly of London Clay of the Barnet Plateau underlain by a chalk aquifer. The London Clay acts as a protective barrier both to infiltration as well as rising groundwater from within the chalk aquifer. The River Brent corridor runs on a bed of low level gravel.

7.2. Barn Hill Open Space has been put forward for designation as a locally important geological site within the emerging London Plan due to the presence of Dollis Hill Gravel.

7.3. As of November 2014, 1778 sites were identified as having potentially contaminative historic uses. These sites (Historical Industrial Sites within Brent) are identified in Figure 23. However, as of 2018, sufficient information had been identified for 360 sites as to whether they were 'contaminated' as per the statutory definition. The majority

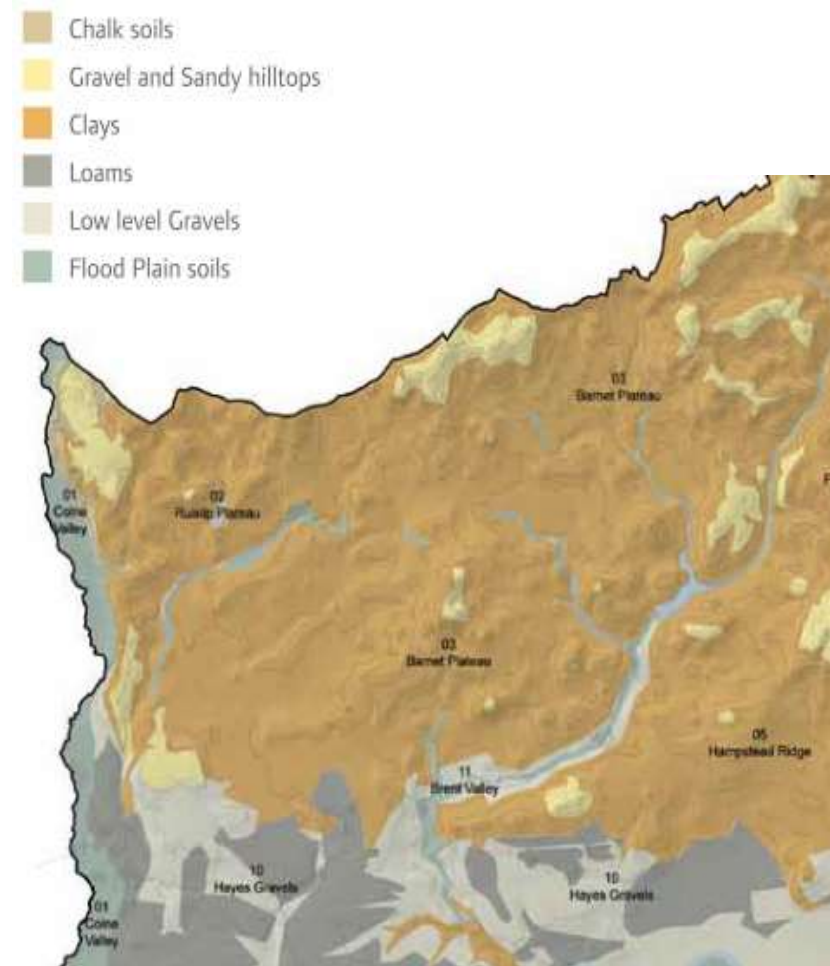


Figure 22: Geology of Brent

of these have been redeveloped via the planning regime, where the investigation and remediation of soil was secured through planning conditions.²¹

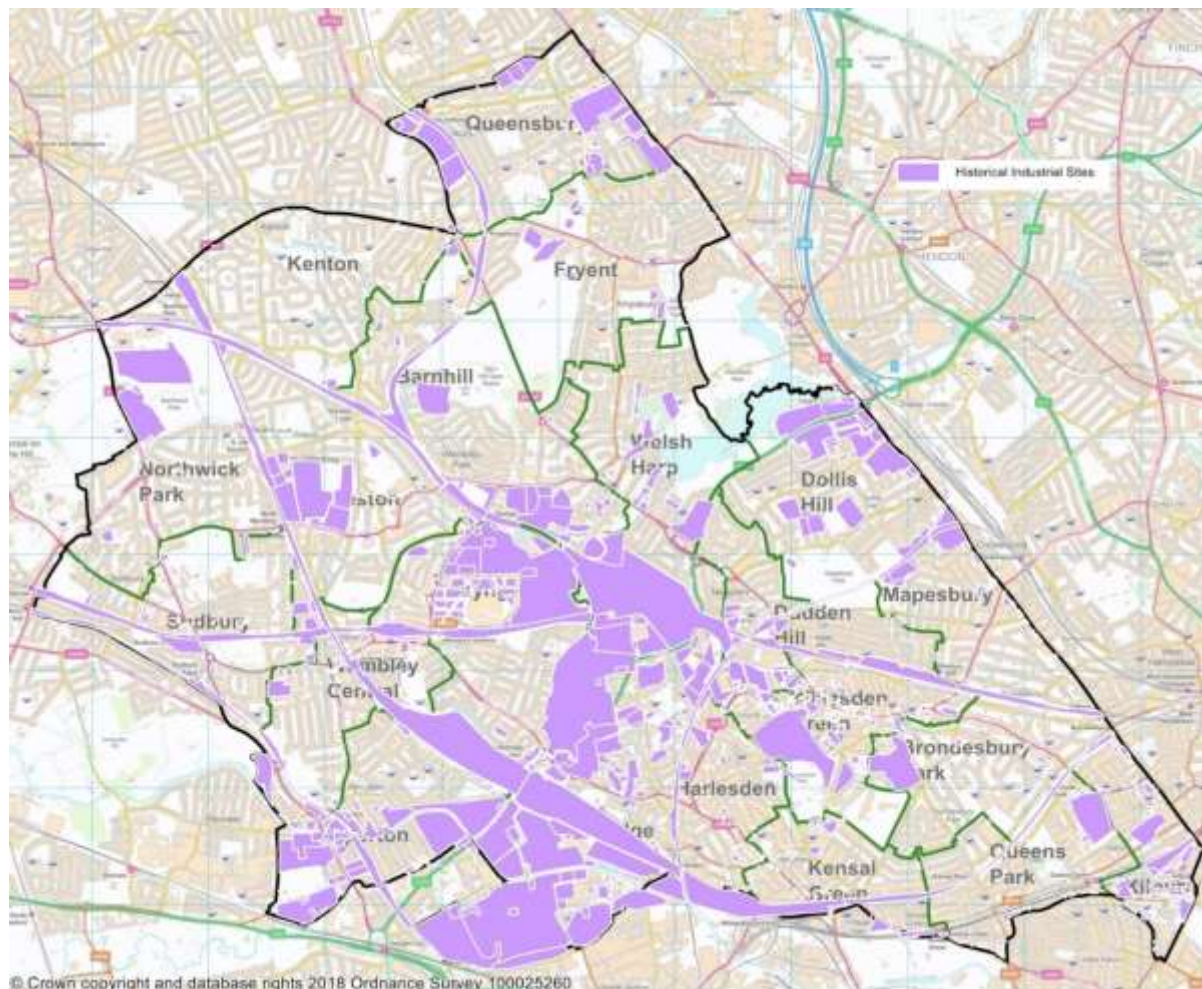


Figure 23: Historical Landfill Sites within Brent

²¹ Contaminated Land Inspection Strategy, Brent Council

8. Climate Change

Evidence:

- Brent Climate Change Strategy and supporting evidence document
- Joint West London Strategic Flood Risk Assessment
- Climate Just (www.climatejust.org.uk)

Evidence Gaps:

- None Identified

8.1. Climate Change is a process by which our 'usual' weather patterns begin to change at an annual rate because of a gradual warming of the Earth's surface. As well as gradual changes, it is predicted to increase the number of extreme weather events, such as flooding, heat waves, droughts and storms.

Heat

8.2. It is anticipated that as a result of climate change, temperatures will be higher all-year round, by an average of +3.6° in the summer and +2° in the winter by 2050.

8.3. London is affected by overheating, which is further exacerbated by the Urban Heat Island (UHI) effect. UHI is caused by the reduction in green space through urbanization, generation of heat in an area and the large amount of urban hard surfaces which prevent cooling. Within London, the UHI can add up to a further 5°- 6° on a summer night which can result in London areas being up to 10°C hotter than rural areas. It is also expected that the summer heat wave of 2003, which caused 600 deaths in London, will be the average by the 2040s.

8.4. Due to Brent being a largely urban area with comparatively little parkland, higher temperatures will have a bigger impact due to the amount of concrete buildings. A hotter Brent will create a number of social impacts, such as more people suffering from illness. However, as shown in Figure 24, residents that live within a particular area of the borough are more vulnerable to the impacts of increased heat than others.

8.5. Figure 24 shows areas of social heat vulnerability within the borough. Social heat vulnerability is mapped through showing how persona, social and environmental factors can create uneven impacts on people and communities in respect to a heat-related hazard. The following five dimensions are used to assessed social vulnerability:

- Sensitivity – biophysical characteristics which affect the likelihood that a heat wave or flood event will have a negative health and welfare impact. Characteristics assessed for this dimension include age and health.
- Enhanced exposure – aspects of the physical environmental that could accentuate or offset the severity of heat wave and flood events. Characteristics assessed for this dimension include the availability of green space, topography, availability of blue space and housing characteristics
- Ability to prepare – this is governed by social factors. Characteristics assessed for this dimension include income, tenure, and information use
- Ability to respond – this is governed by social factors. Characteristics assessed for this dimension include income, information use, social networks, mobility, crime, general infrastructure and general accessibility
- Ability to recover – this is governed by social factors. Characteristics assessed for this dimension include social networks, mobility and availability of services.

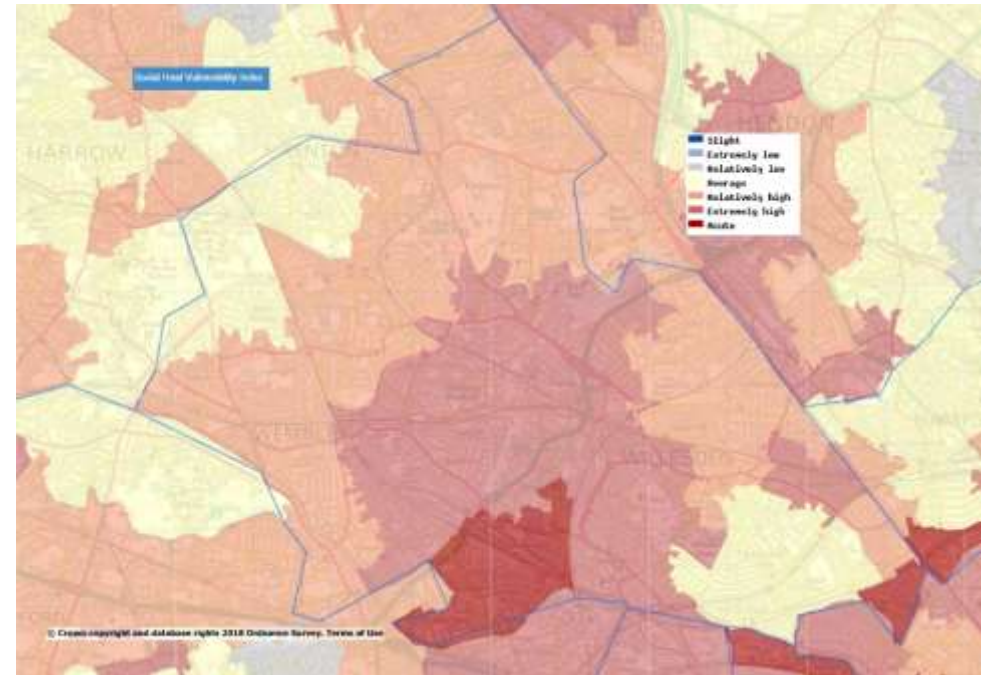
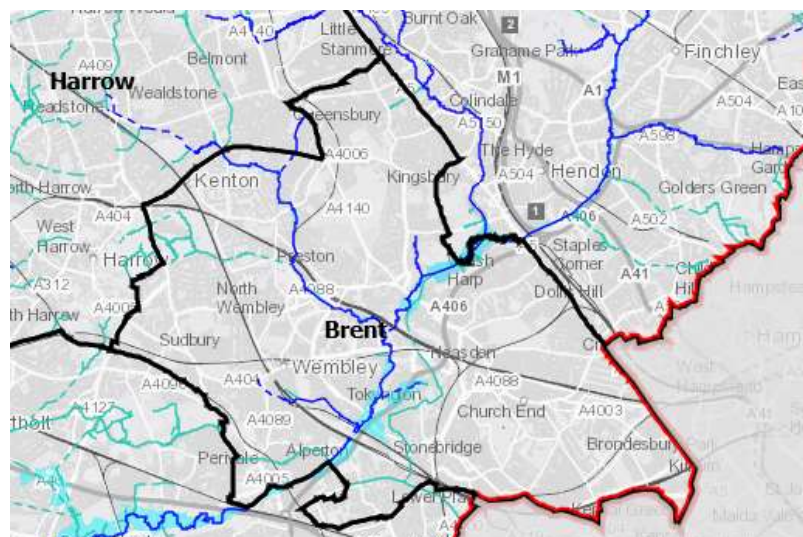


Figure 24: Social Heat Vulnerability

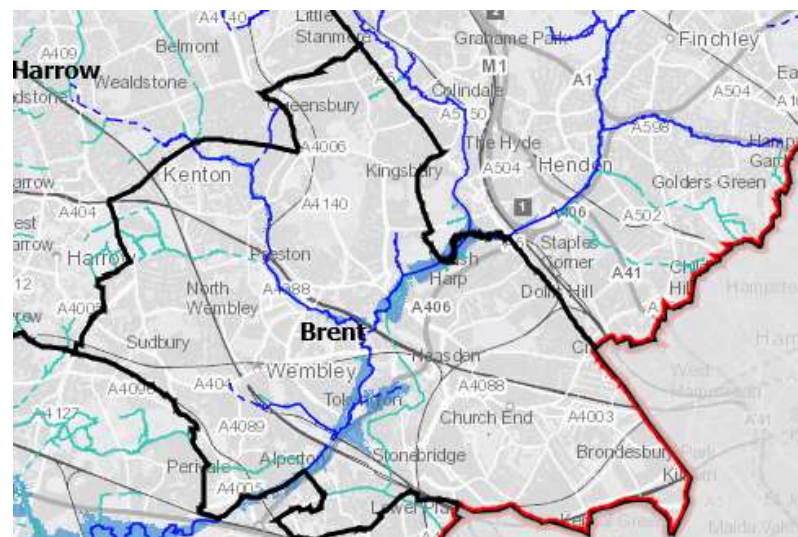
8.6. As shown above, there are areas within the Stonebridge Ward and Kilburn Ward, which have acute social heat vulnerability, and the central region where there is extremely high social heat vulnerability. The area within Stonebridge which has acute social heat vulnerability largely falls within the administrative area of OPDC.

Rainfall and Flooding

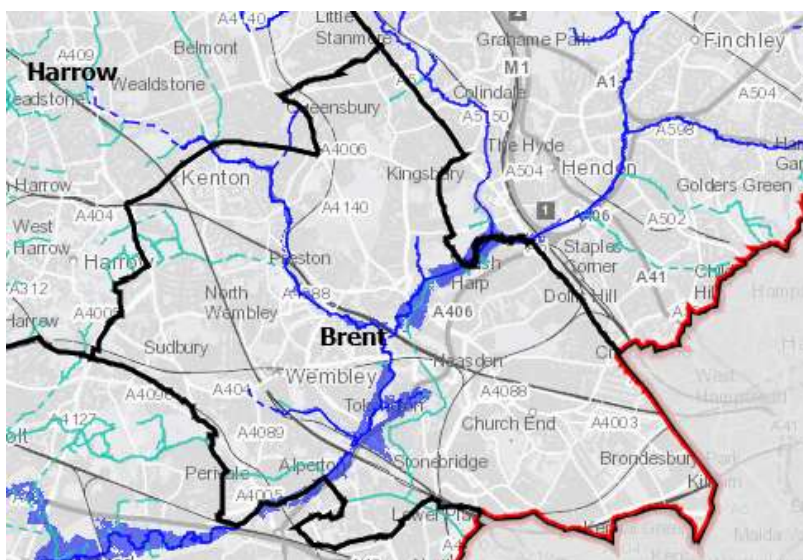
- 8.7. Heavy thunderstorms and intense winter downpours will become more common as a result of climate change. Due to Brent's urban, built-up nature, almost all rainfall ends up in drains which have not been designed to cope with sudden, very heavy rainfall. This will result in flash flooding, which could block roads, cause damage and lead to prolonged disruption to the local economy.
- 8.8. The Joint West London SFRA assessed the impact that climate change would have on flood risk within the west London boroughs. The impact that climate change can have on fluvial flood risk within the borough is shown in Figure 25. The below maps indicates that increases within the peak river flow, the greater the area impacted by fluvial flooding within the borough.
- 8.9. Climate change can also increase the risk of surface water flooding within the borough. The SFRA identifies that the 3.3% annual probability extent is considered to represent the current likely risk and the 1% annual probability extent represents the potential climate change adjusted impact of current risk. In general, the greater the probability, the greater the area impacted by surface water flooding. Furthermore, the impacts of areas already affected by climate change could become more severe as a result of the increase in water depth. This is demonstrated in Figure 26, which focuses upon the area around Wembley Stadium.



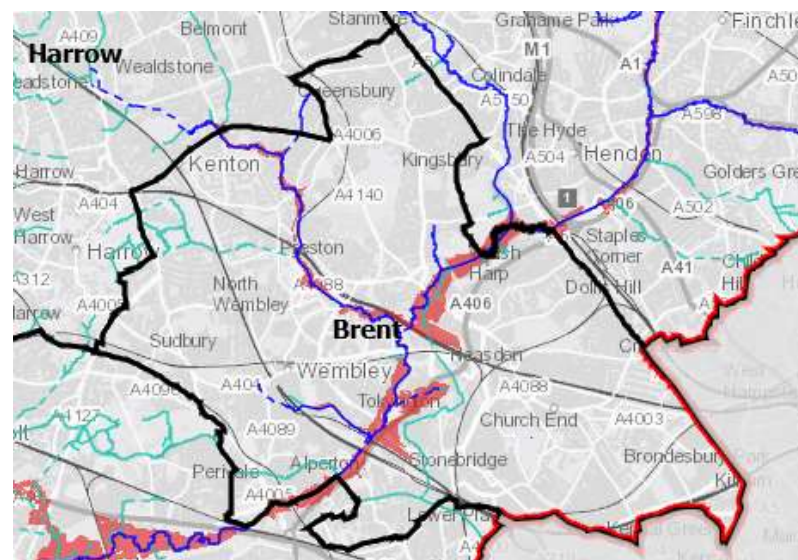
1 in 100 year probability event



1 in 100 + 25% increase in peak river flow due to climate change



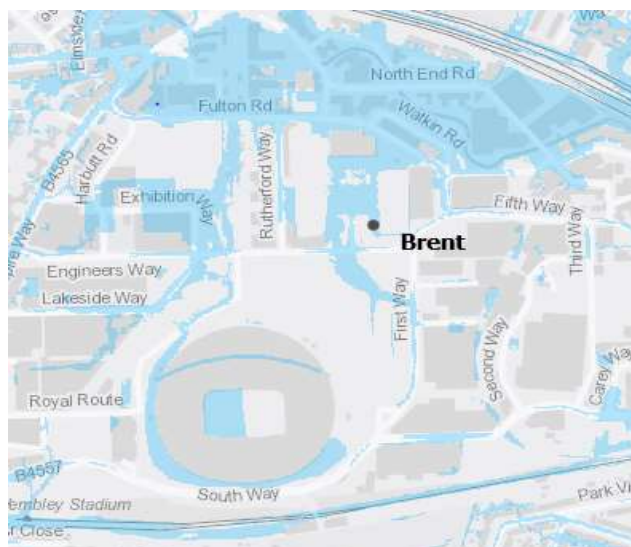
1 in 100 + 35% increase in peak river flow due to climate change



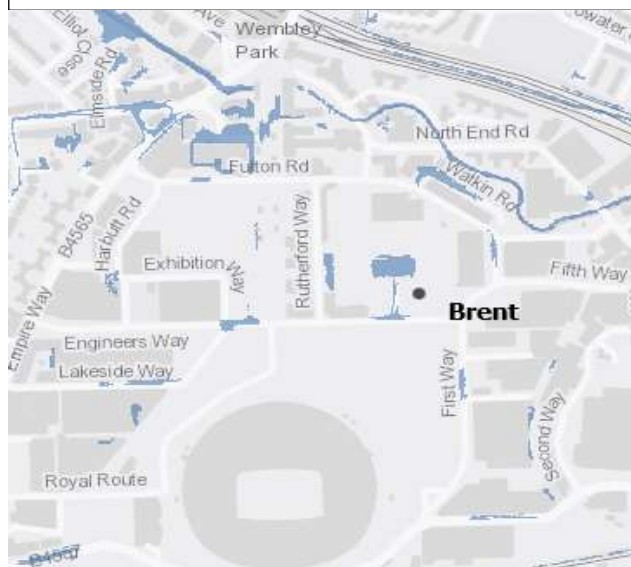
378

1 in 100 + 70% increase in peak river flow due to climate change

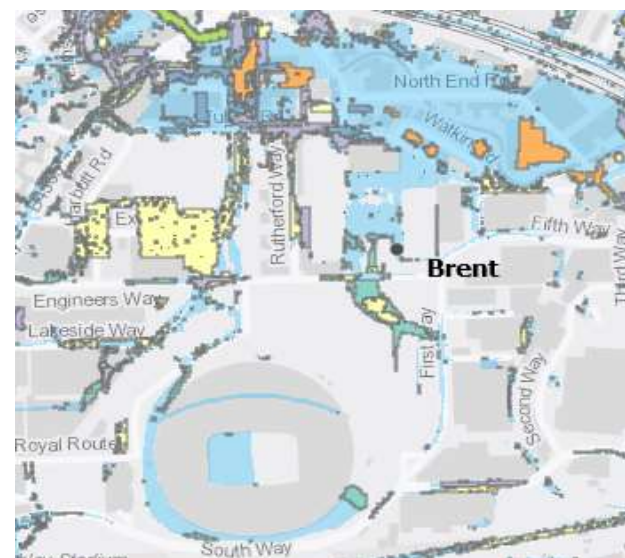
Figure 25: Impacts of climate change of fluvial flood risk within Brent



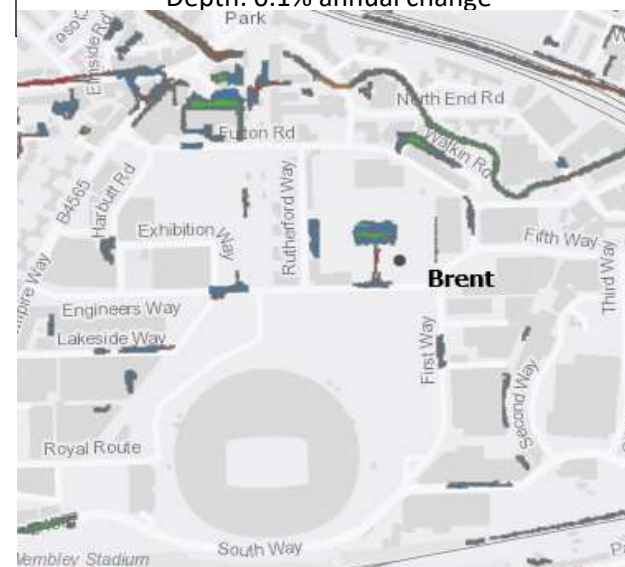
EA 2017 – Risk of Flooding from Surface Water.
Extent: 0.1% annual change



EA 2017 – Risk of Flooding from Surface Water.
Extent: 3.3% annual change



EA 2017 – Risk of Flooding from Surface Water.
Depth: 0.1% annual change



EA 2017 – Risk of Flooding from Surface Water.
Depth: 3.3% annual change

379

Figure 26: Impact of climate change on surface water flooding - area around Wembley Stadium

- 8.10. Figure 27 maps the flood vulnerability index for the borough. Flood socio-spatial vulnerability refers to mapped social vulnerability with respect to flooding. Personal, social and environmental factors are all taken into consideration and are used to help to explain the uneven impacts on people and communities in particular neighborhoods/areas. Like social heat vulnerability, the flood vulnerability index uses the same five dimensions to assess social vulnerability to flooding events. Areas where people are particularly vulnerable to flood risk are Stonebridge, large areas of Tokyngton, Gladstone and parts of Dudden Hill and Welsh Harp.

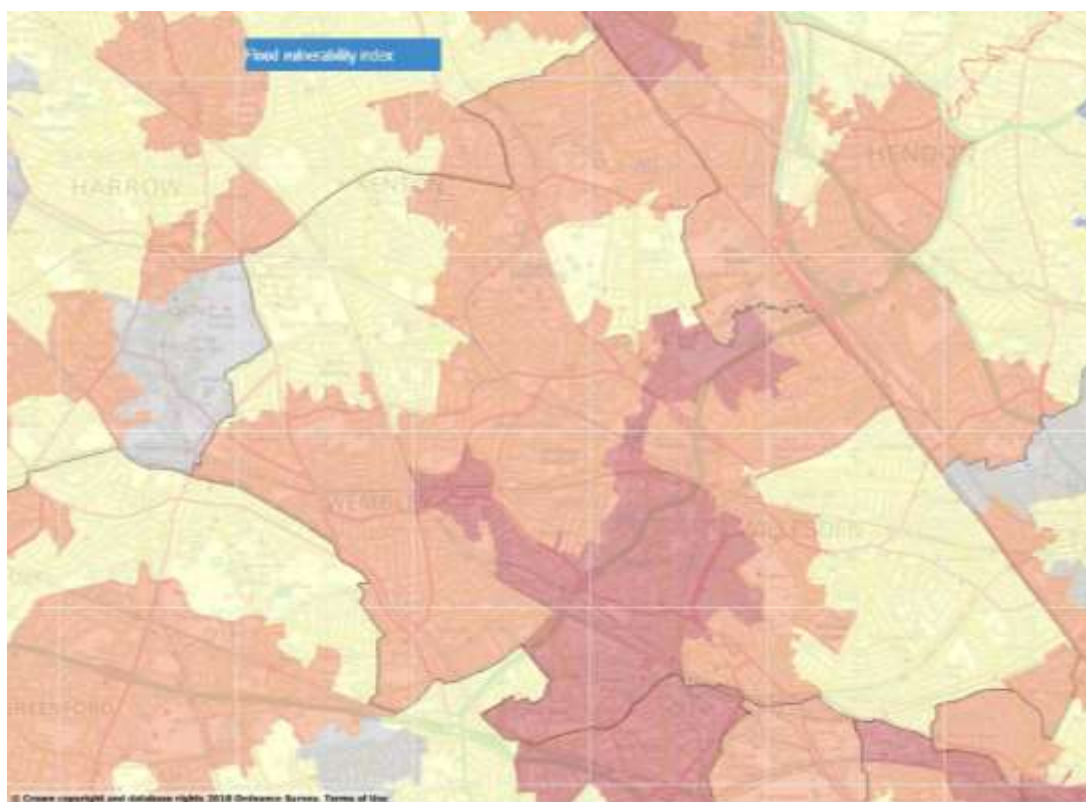


Figure 27: Flood vulnerability index

Storms

- 8.11. In the winter of 2006, Brent suffered from a tornado which damaged over 100 houses. Increased storminess as a result of climate change would increase the chances of a similar event happening again in Brent.

Risks of Climate Change to Brent

- 8.12. Brent Council's Climate Strategy identified the following 'possible' future risks for Brent as a result of climate change:
- The London to Birmingham train line runs through Brent and might be damaged by heat stress, causing major delays and possibly the need for major reconstruction
 - Densely populated areas, such as South Kilburn, will heat up very quickly, causing discomfort and possible severe heat and premature death to residents. People with existing illnesses, mental health problems and the elderly are especially vulnerable to heat stress.
 - The areas close to the North Circular Road (A406), where air quality is currently the worst in the borough, will suffer during hot weather because air quality deteriorates rapidly as temperatures rise. This may cause medical difficulties and affect people's quality of life.
 - Food processing is one of the key sectors in Brent's economy. Food safety is one of the top concerns for health managers during a heat wave. Without changes to training and facilities, the sector could be badly affected by the challenges of maintaining high standards of food hygiene during heat waves in the future.
 - Small sections of the North Circular may be flooded, causing traffic chaos in the borough
 - Brent's retail industry will suffer if climate change disrupts travel into, within and out of the borough.
 - 8% of Brent's area is covered by green spaces. Not only will these spaces become more difficult to manage as drought becomes more frequent, but the borough will require more green spaces in order to cope with a warmer climate in the future.
 - Brent's emergency services and hospitals will have to cope with more demand if surrounding boroughs are hit by flooding or heat waves
 - Global events are likely to cause increased migration flows into London and the south-east, which will add to Brent's population and put a strain on existing services and facilities (i.e. hospitals, schools, housing and transport networks)

9. **Biodiversity, Flora and Fauna**

Evidence

- Brent Review of Sites of Importance for Nature Conservation

Evidence Gaps

None identified

9.2. The borough has 62 Sites of Importance for Nature Conservation. The location of these sites are identified in Figure 28.

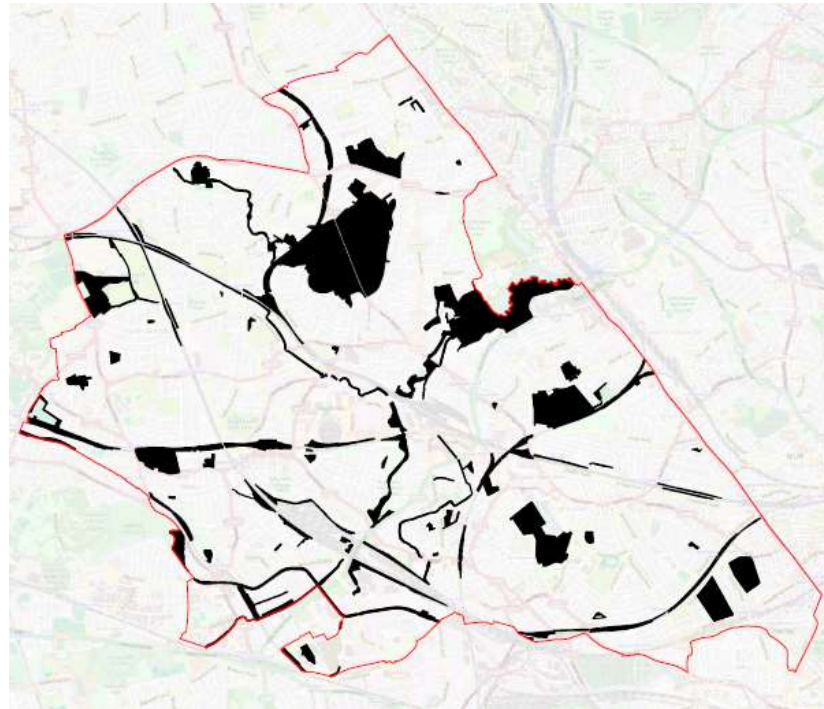


Figure 28: Location of SINC sites within the borough

9.3. The 2014 Review of Sites of Importance for Nature Conservation in Brent found that the quality of habitats in the borough varied from poor structure and species diversity to species-rich and structurally diverse. It found that some areas of woodland, such as those found at Coronation Gardens, although planted, had become naturalised through cessation of management and offer a good, diverse habitat. Other areas of woodland, appeared to have declined since the last survey are now structurally and species poor, for example, The Old Orchard is now a stand of mature trees over amenity grassland.

9.4. The Review stated that there were a number of invasive species recorded on various sites. Three of the commoner invasive species were recorded in the Brent River Park, and large stands of Japanese Knotweed were recorded on several, put in particular on the railway tracksides. Parakeets were found in a number of parks within the borough.

9.5. The borough has a wide range of habitats where biodiversity can be found. This includes:

- **Trees, Woodlands and Hedgerows:** A wide range of habitats is associated with trees in Brent. These include broadleaved woodland, lowland mixed deciduous woodland, wet woodland, street trees, veteran trees, orchards, hedges and hedgerows, and scrub.
- **Grasslands:** A large proportion of the borough has grassland cover which provides benefits for recreation, urban flood reduction and soil conservation, only a proportion of this is actively managed for wildlife. Of the wildlife grasslands in the borough, the hay meadows at Fryent Country Park are amongst the best in London. In other areas of the borough, for examples around the Brent Reservoir, on Barn Hill and at Gladstone Park, there are remnants of more acid grasslands. Elsewhere there are rough grasslands and wildflower meadows in a few gardens.
- **Private Gardens and Allotments:** The 2007 Biodiversity Action Plan states that private gardens occupy a fifth of the borough by land area and had 1,108 allotment plots (this has since increased to 1138 plots and 103 shed plots as identified in the Food Growing and Allotment Strategy). Approximately 20% of biodiversity by land area in Brent is represented via its gardens and allotments.
- **Wetland Habitats:** Wetland habitats include habitats that provide for freshwater wildlife: rivers and streams, ditches, the Brent Reservoir, Canal Feeder, Grand Union Canal, freshwater marsh and reed-be habitats; and ponds. Each of these could be considered individually and as contributing to a richer wildlife in Brent. Most habitats could also be considered in terms of length or area, water quality, wildlife, access and specific projects.

- **Railside Habitats:** These areas are generally inaccessible to people, however they can provide areas of scrub, rough grassland and other habitats
- **Schools grounds:** A small proportion of school grounds include SINC. The Welsh Harp Environmental Education Centre (which was previously managed by the borough until 2016) is a dedicated facility for environmental education, but is also a base for waterway improvement projects taking place across north-west London.
- **Parks and Green Spaces:** Parks and green spaces provide much of the area of publicly accessible land in the borough and encompass much of the semi-natural habitats including grasslands, trees, woodland, hedgerows and ponds.
- **Churchyards and Cemeteries:** As well as provide areas of contemplation and waling, churchyards and cemeteries provide a range of intricate habitats, often with various grasslands and open woodland habitats. All three cemeteries within the borough boundary and both burial grounds are recognised by the GLA as Sites of Importance for Nature Conservation (SINCs).

9.6. There are no European or other internationally designated sites within the borough. The closest internationally designated site to the borough is Richmond Park, which is a Special Area of Conservation, located 8km to the south of the borough.

9.7. Located within the Brent and Barnet is Brent Reservoir SSSI. The SSSI is 69.37 hectares. 100% of the site is in a favourable condition. The reservoir was formed in 1835 by damming the valley of the River Brent below the confluence of its two constituent tributaries. The Brent Reservoir is of interest primarily for breeding wetland birds and in particular for significant numbers of nesting great crested grebe. The diversity of wintering waterfowl and the variety of plant species growing along the water margin are also of special note for Greater London.

9.8. As of January 2020, there were 265 tree preservation orders within the borough. Some of the orders protect a single tree whereas others protected multiple trees. In a couple of instances, the orders protect small woodlands.

10. Heritage Assets (Architectural and Archaeological)

Evidence

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

Evidence Gaps:

- Brent has not had a comprehensive review of its statutory listed buildings since 1978
- The Local List of Buildings of Architectural or Historic Importance was established in 1975 with the last adopted version recorded in 2004. A public consultation exercise was undertaken in 2015, identifying over 100 potential properties, however, the final list was never adopted.
- The Archaeological Priority Areas for Brent are due for review in 2020. Further information is available at <https://historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/greater-london-archaeological-priority-areas/>
- In 2006 character appraisals for all 22 conservation areas were published. These are not fully comprehensive and are out of date. An audit of existing conservation areas took place in 2019 with a number of recommendations, such as alterations of existing Design Guides, boundary reviews, and introduction of Article 4 Directions.

- 10.1. Heritage assets make a substantial contribution to Brent's local character and distinctiveness. They are a unique and irreplaceable resource which justifies protection, conservation and enhancement. The borough has historic formal public parks, garden and cemeteries as well as planned 'garden village' estates but its archaeological discoveries from early prehistory are scarce.

- 10.2. Brent's heritage assets include a wide range of architectural styles from Victorian Italianate, Gothic Revival, suburban 'Arts and Crafts', 'Tudorbethan', 'Old World', Modern and Brutalist. Furthermore, the British Rail lines and the Metropolitan Railway enabled suburban 'Metroland' development. This was boosted by the British Empire Exhibition in Wembley Park in 1924/25. Many historic buildings within Brent reflect the styles of these times, but it also has examples of mandir architecture as well as 'moorish' and 'Indo-Islamic'.

Statutory Listed Buildings

- 10.3. A statutory listed building is a building or structure that has been placed on the National Heritage List of buildings of special architectural or historical interest by the Secretary of State for Culture, Media and Sports (DCMS). Historic England manages and maintains the National Heritage List of all national designated heritage assets including Brent's listed buildings and registered parks and gardens

- 10.4. There are around 250 statutory listed buildings in Brent. These buildings are listed under the following categories:

- Grade I buildings – these are buildings that are of exceptional interest. There is one Grade I listed building within Brent
- Grade II* buildings - these buildings are particularly important buildings of more than special interest. Brent has 9 Grade II* buildings
- Graded II buildings – buildings that are of special interest. Brent has around 240 Grade II buildings within the borough.

- 10.5. Most listed buildings within Brent are residential properties that are in private ownership.

Heritage at Risk

- 10.6. The Heritage at Risk Programme (HAR) helps Historic England understand the overall state of England's historic sites. Launched in 2008, the programme identifies those sites that are most at risk of being lost as a result of neglect, decay or inappropriate development. Every year, Historic England updates the Heritage at Risk Register. As of January 2020, Brent Council has 9 buildings on the register. The details of these have been extracted from the HAR register and summarised in the below table.

Name	Description	Heritage Category	Condition	Additional Information
Former Savoy Cinema, Burnt Oak Broadway, Edgware	The Savoy Cinema was built for the independent circuit Goide & Glassman and was designed by cinema architect George Coles. It opened on 29th June 1936 with Bobby Breen in "Rainbow on the River". It is an impressive cinema with all of its internal Moderne fittings intact. It operated as a bingo hall from the 1960s but closed in 2014.	II	Poor	Despite several attempts to sell, occupy and find a new use for the building it remains empty and in a declining state with crumbling plasterwork.
Summerhouse, Kingsbury Manor, 288, Kingsbury Road	Summerhouse, circa 1899, by William West Neve, who designed the adjoining Kingsbury Manor for Mary Blair, Duchess of Sutherland. Built in the Arts and Crafts style, timber-framed with patterned brick nogging on a brick plinth edged with stone, and a hipped thatched roof.	II	Poor	The Local Authority and the owner have begun discussions to develop a strategy for the summerhouse's repair and re-use.
Church of St Andrew, High Road, Willesden Green	Designed by James Brooks and built in 1885 in red brick with stone dressings and steeply pitched slated roofs. There is a small bell turret with a slate clad fleche over the crossing. Brooks also designed the adjacent grade II vicarage.	II*	Poor	The church suffers from cracking, some severe, mainly at the eastern end. Potentially loose stones internally have been pinned to secure them and the church is undergoing monitoring and various investigations in order to ascertain the cause of movement which is resulting in the cracking.

Name	Description	Heritage Category	Condition	Additional Information
Old Oxgate Farm, Coles Green	C16 and C17, timber-framed and plastered with a little brick rebuilding. Two parallel ranges, that to north probably C16, that to south C17, ending in a double gable end on road. Three storeys with one window (modern casement with lead light) per floor under gable. Left hand of around floor rebuilt in brick. Central door with wooden porch. Main front facing south on garden at right angles to road. Two storeys. 2 windows and door. Tile roof. Windows 3-light slashes with trellis porch. Interior – ground floor room with moulded and chamfered beams and floor of large flagstones.	Grade II*	Poor	C16 and C17 timber-framed building suffering from subsidence to the brick plinth and structural failure of beam ends to the ground floor due to damp penetration. The owner carried out urgent works in 2013 and is exploring possible long term solutions. A condition assessment was produced in 2016, funded by Historic England, and priority works identified in that survey to safeguard the building were completed in 2017. Funding for repair to the front façade is due to be secured through a Section 106 agreement but this has not yet been implemented.
Cambridge Hall, Cambridge Avenue	Former church, now hall. 1863. Prefabricated structure built of corrugated iron with boarded wooden roof covered in corrugated asbestos. Fairly elaborate example with 4 bay nave, aisles and tower, which originally had a chamfered spire which has been broken off near the base. Central tower of two stages has pointed arched window with two lancets, quatrefoil above and louvres. Large arched doorcase with steeply pitched gable above. Lancet on either side of tower and large arched window to aisles. Square windows to sides of aisles. Interior has unusual arcading with cast iron columns with	II	Poor	Since 1930 it has been the homes of the Willesden and St Marylebone Cadet Corps which converted the interior to resemble a boat, in itself of historic interest. It is putting together a business plan to acquire funds to run the building as a community venue. Planning Permission and Listed Building Consent were granted in 2016 for an adjacent residential building, as well as some repair works to Cambridge Hall.

Name	Description	Heritage Category	Condition	Additional Information
	moulded capitals and tall slender wooden arches. One aisle has been partitioned off. Unusual roof has 6 tiers of purlins and the principal rafters have giant wooden arches with pierced quatrefoils, daggers and mouchettes.			Discussions are underway about restoration and funding sources.
The Chapels at Paddington Cemetery, Willesden Lane	1855, by Thomas Little as part of a new cemetery. Typical group of Anglican and nonconformist chapels connected by a pair of carriage-porches and a central bellcote behind which is a lodge. C13 style, the Anglican chapel having richer, more developed windows. Squared rag-stone with ashlar dressings slated roofs. Iron finials.	II	Poor	The vacant buildings are isolated within the cemetery and too danger to use. Funding for repairs and a long term solution is being sought.
Wembley Hill Lodge, Wembley Hill Road	Early 19th century cottage orné style. One storey and attic colour washed brick with gable to front. One 2 light leaded casement in gable; one 3 light leaded casement oriel window on ground floor with thatched roof. Part set back to right of one storey with continuous lean to roof in front, serving as a canopy to porch. Thatched roof. Left hand part has colour washed brick lower part; 20th century tile hanging to upper floor and tile roof. Formerly a lodge to Wembley Park.	II	Very Bad	The detached property was severely damaged by a fire in 2013 and the owner is intending to sell the building.
St Michael's Church, St Michael's Road, Wembley	Designed by John Samuel Alder and built in 1910 in stone with pitched roofs, covered in tiles, and flat roofs to the aisles which are felted. In the north west corner is the base of a tower which was never built. The church generally is in poor condition with movement resulting in	II	Very Bad	Immediate risk of further rapid deterioration or loss of fabric; no solution agreed

Name	Description	Heritage Category	Condition	Additional Information
	cracking, and faulty rainwater goods allowing water ingress with much staining internally. The west end window is supported by a framework of scaffolding poles.			
842 Harrow Road, Queens Park	Early C19 detached villa with later alterations and extensions. The building has been unoccupied for a number of years and is in very poor condition, with some unauthorised and harmful works having been carried out by the previous owner. Urgent and temporary propping works have been implemented and applications for Planning Permission and Listed Building Consent are being considered by the Local Authority (May 2019).	II	Very Bad	Immediate risk of further rapid deterioration or loss of fabric; no solution agreed

Table 9: Listed Buildings/ Structures within Brent on the Heritage At Risk Register

Local List

- 10.7. The Local List of Buildings or Architectural or Historic Importance is an essential tool in the protection and enhancement of local heritage (non-designated heritage assets). Whilst not Statutory Listed, these buildings and structures are of good quality design or area historically significant. There are important local landmark features in their own right and make a significant contribution to the character and appearance of their locality. These assets are known as 'locally listed' and includes monuments, sites, places, areas of landscapes identified as having a degree of significant meriting consideration in planning decisions
- 10.8. There are over 200 non-designated heritage assets on the Council's Local List on Brent's Local List. The Local List of Buildings of Architectural or Historic Importance was established in 1975 with the last adopted version recorded in 2004. There are currently no Article 4 Directions placed on any buildings within the list (outside of conservation areas) and these remain unprotected from demolition and damaging alterations.

Conservation Areas

10.9. Conservation areas are designated to safeguard areas of special architectural and historic interest, the character and appearance of which is desirable to preserve or enhance. There are currently 22 conservation areas in Brent within which there are special planning controls which needed to be considered when undertaking development. The 22 conservation areas within the borough cover approximately 323 hectares, which equates to 7.47% of the borough's area.

10.10. The 22 conservation areas within the borough are identified in Figure 29, with their location being depicted in Figure 30.

Barn Hill	Brondesbury	Kensal Green
Harlesden	Homestead Park	Mapesbury
Kilburn	Lawns Court	North Kilburn
Mount Stewart	Neasden Village	Queens Park
Northwick Circle	Paddington Cemetery	St Andrews
Roe Green Village	South Kilburn	Wembley High Street
Sudbury Cottages	Sudbury Court	
Willesden Green	Buck Lane	

Figure 29: Conservation Areas within Brent

Conservation Character Appraisals

10.11. Section 71 of the Planning (Listed Buildings and Conservation Areas) Act 1990 places on local planning authorities the duty to draw up and publish proposals for the preservation and enhancement of conservation areas in their districts. Regularly reviewed character appraisals identifying threats and opportunities can be developed into a management plan, which can in turn channel development pressure to conserve the special quality of the conservation area. Both areas in relative economic decline and those under pressure for development can benefit from management opportunities that promote beneficial change

- 10.12. In 2006 the Planning Service produced Character Appraisals for the Borough's 22 conservation areas in response to the Council's Comprehensive Performance Assessment. Although these were based on guidance from Historic England, the appraisals were generic, describing history but do not properly describe the significance of the area nor outline proposals for management. There is new guidance (2016) from Historic England on which provides advice on the appraisal of conservation areas, assistance in demonstrating special interest and articulating character, guiding investment, and in developing a management plan.
- 10.13. An audit of existing conservation areas took place in 2019. A number of recommendations have been made following this audit, including reconsidering Article 4 Directions, updating Area Design Guides, and redefining conservation area boundaries.

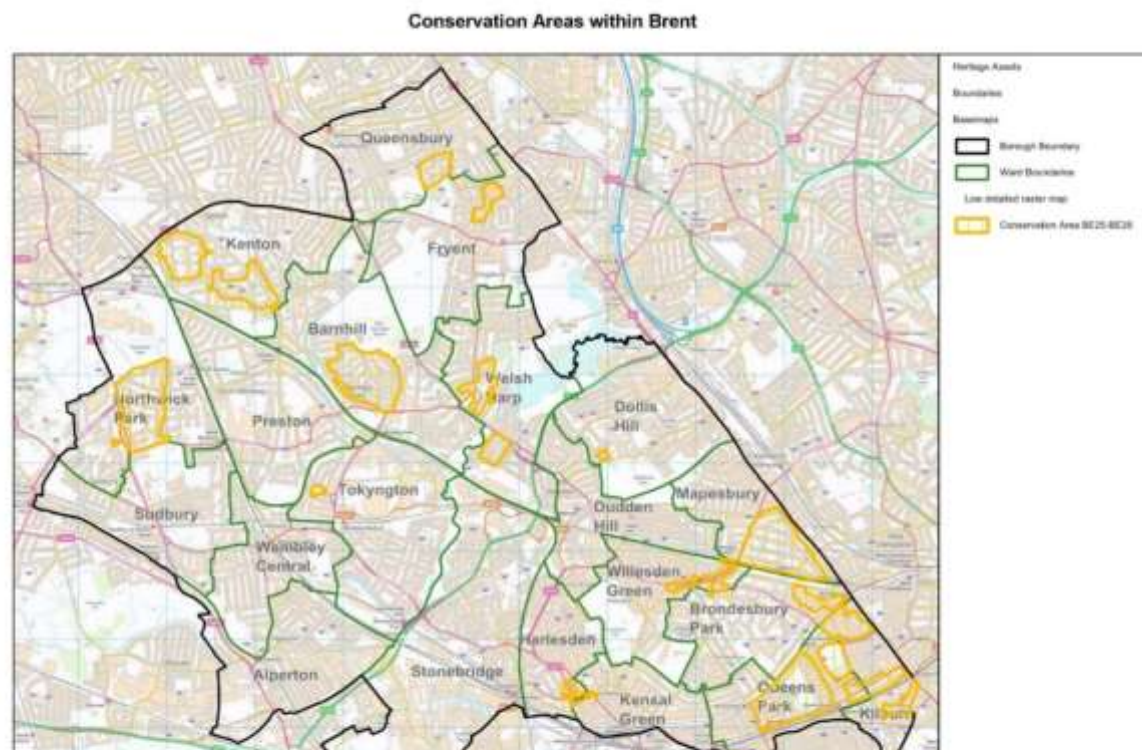


Figure 30: Location of Brent's Conservation Areas

Article 4 Directions

10.14. Article 4 Directions are in place for Brent's residential conservation areas. Article 4 directions restrict the scope of permitted development rights either in relation to a particular area or site, or of a particular type of development anywhere in the authority's area. The last formal consultation on Article 4s was undertaken in 2005 with Directions being made for the following Conservation Areas: Northwick Circle, Buck Lane, Kensal Green, Kilburn, Homestead Park, Sudbury Cottages, Wembley High Street, Brondesbury and St Andrews. There are residential properties within the commercial based conservation areas that do not have an Article 4 Direction and there are locally listed buildings outside of conservation areas which do not have Article 4 Directions. None accord with the General Permitted Development Order 2015.

10.15. Brent's 2019 Historic Environment Place-Making Strategy recommends the undertaking of a full review of Brent's conservation areas to ensure they have special architectural and historical interest, including updating Article 4 Directions as necessary.

The Archaeological Priority Areas (APAs) and sites of Local Archaeological Importance (SAI)

10.16. Archaeological Priority Areas (APAs) are areas where there is significant known archaeological interest or potential for new discoveries. APAs are used to help highlight where development might affect heritage assets. There are four APAs within Brent, with their location depicted in Figure 31.

10.17. In addition to the 4 APAs, Brent has 4 sites of Local Archaeological Important (LAI).

10.18. The Greater London APAs were created in the 1970s and 1980s either by the boroughs or local museums. They are now being comprehensively reviewed and updated using up to date evidence and consistent standards to comply with National Planning Policy. The new system assigns all land to be one of four tiers denoting different levels of sensitivity to development indicated by an archaeological risk model.

10.19. Brent's Review is scheduled to be undertaken in 2049 and will include the 40 SAIs.

Figure 31: Location of Archaeological Priority Areas (APAs) within Brent

11. Landscape and Townscape

Evidence:

- Analysis of townscape analysis undertaken in 2007 for the Development Management Policies DPD Preferred Options
- All London Green Grid SPG, 2012, GLA
- All London Green Grid, DRAFT Brent Valley and Barnet Plateau Area Framework, GLA Design for London Borough of Brent
- Brent Historic Environment Place Making Strategy, 2019, Brent Council
- Tall Building Strategy, 2018, Brent Council
- Open Space Study, 2019, Brent Council

Evidence Gaps:

- None

11.1. The built environment is the setting for all the borough's activities in the urban area. The design and quality of Brent's built environment is not only about its appearance and attractiveness, but the overall 'form' of the development/environment and its use. The townscape quality varies across Brent. A townscape analysis undertaken in 2007 identified a number of areas within the borough that were judged to be of low townscape quality. These areas are highlighted in Figure 32.

11.2. Since this study was undertaken many areas, including South Kilburn, Stonebridge and Wembley Growth Area, have been subject to, or are in the process of significant development. This has resulted in improvements to the quality of the built environment and public realm. Alongside the Local Plan, the Council has produced a Tall Building Strategy to support the location of tall buildings in the most appropriate areas and clarify which areas are not, and a Historic Environment Place Making Strategy to set out how the historic environment can



Figure 32: Areas of low townscape quality within Brent

play an important role in delivering regeneration in the Borough, through supporting the objectives of the Local Plan as well as promoting quality place-making.

- 11.3. The All London Green Grid SPG identifies that the majority of Brent is within the 'Brent Valley and Barnet Plateau' landscape area. To supplement the All London Green Grid SPG, six area frameworks have been produced to expand on the implementation points and strategic opportunities identified in the SPG. One of the six area frameworks produced covers the 'Brent Valley and Barnet Plateau'.
- 11.4. The key landscape zones in Brent is the Brent River Valley which is described as having a natural signature of meandering, shallow river bordered by diverse floodplain meadows and winding strips of damp woodland. It is noted that there are significant green infrastructure assets in the Brent Valley and Barnet Plateau, but many are hidden and isolated within a largely car bound urban fabric. Way-marked long distance walks – the London Loop and Capital Ring, and local riverside routes – The Dollis Trail from Brent Cross to the greenbelt, or the Brent River Walk between the A40 and the Thames provide connections between large open spaces of real distinctiveness and biodiversity. The Brent Reservoir by the Junction of the North Circular, A5 and M1 is of particular note – it is an SSSI, has a naturalised shoreline, accessible paths and facilities for bird watching and sailing.
- 11.5. Open Spaces form a key part of the borough's landscape. There are 180 open spaces within the borough, which cover 638.421 hectares. The currently level of open space provision within the borough is 1.91ha per 1,000 population. A breakdown of open spaces within Brent is Table 11, with their location depicted in Figure 33.

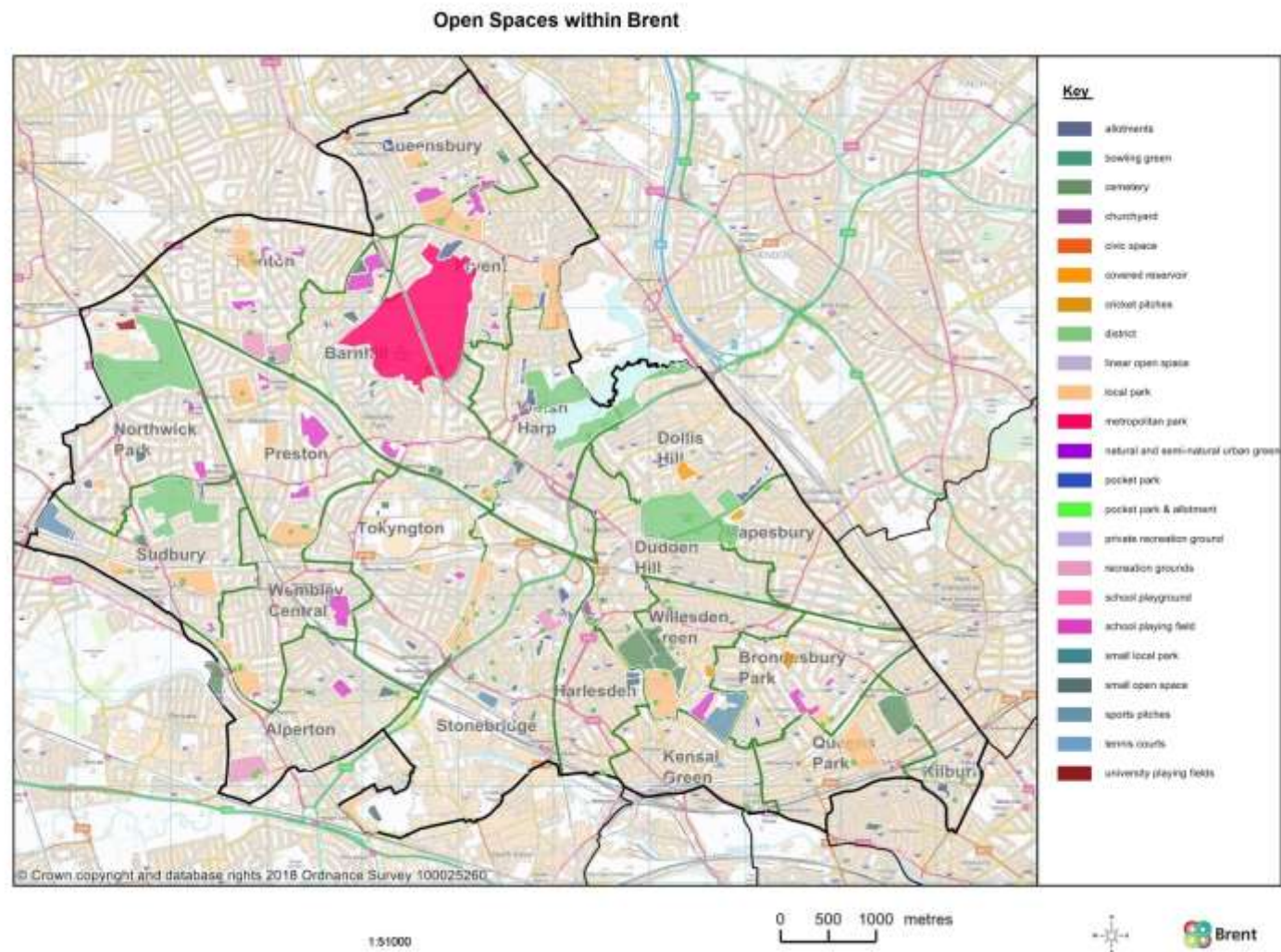


Figure 33: Open Spaces within Brent

Open Space Typology	No. of sites	Area(ha)	%of Open Space Area
Metropolitan Park	v	112.05	17.55
District Parks	5	161.47	25.29
Local Parks	21	154.52	24.20
Small Open Spaces	28	25.80	4.04
Pocket Parks	37	5.89	0.92
Linear Open Space	9	4.72	0.74
Public Parks Total	101	464.45	72.75
Allotments	22	18.45	2.89
Bowling Green	1	0.31	0.05
Cemetery	5	36.30	5.69
Churchyard	3	3.57	0.56
Civic Space	3	0.92	0.14
Covered Reservoir	3	5.63	0.88
Natural and Semi-Natural Urban Green Space (not including SINC sites)	3	0.80	0.13
Private Recreation Ground	1	1.33	0.21
Recreation Grounds	4	23.86	3.74
School Playground/School Playing Fields	26	56.59	8.86
Sport Pitches (not within public parks)	4	22.85	3.58
Tennis Courts	3	1.33	0.21
University Playing Fields	1	2.03	0.32
Total	180	638.42	100

Table 10: Provision of Open Space within Brent

12. Waste

Evidence

- Annual Monitoring Reports
- West London Waste Plan
- The London Plan (2016)
- The new draft London Plan (Intend to Publish) (2019)

Evidence Gaps

- None identified

- 12.1. The total amount of municipal waste collected in 2018/19 was 106,900 tonnes, a reduction of 0.7% from the previous year (107,683 tonnes in 2017/18). In 2018/19, 33% of the borough's waste was recycled and composted, which is below the London Plan target of 65% by 2030.
- 12.2. The new draft London Plan forecasts the amount of household, commercial and industrial waste by borough between 2021 and 2041. The plan requires waste planning authorities and industry to work in collaboration in order to conserve resources, reduce waste, increase material re-use and recycling and reduce waste going for disposal. The projections from the 2016 London Plan and the new draft London Plan are shown in table 12 below. Please note that all figures are in a 1000 tonnes.

13.

	2021 Household, Commercial and Industrial Waste	2041 Household, Commercial and Industrial Waste
Waste Arising Figures (projections) (2019 new draft London Plan)	259	274

Borough-level apportionments of household, commercial and industrial waste	412	437

Table 11: Waste targets for Brent

- 13.1. A Joint West London Waste London Plan, which was prepared by 6 West London Boroughs (Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond upon Thames) to provide a planning framework for the management of waste, identifies sites that are allocated for waste management development in the plan area. In Brent, there are 12 existing safeguarded sites (identified in Table 13). Of these identified site, the Veolia Transfer Station in Alperton and Twyford Transfer Station in Park Royal are identified for increased capacity.

Operator Name	Facility Name	Site Activity
Ace Waste Haulage Ltd	Neasden Goods Yard	CDE Waste Processing/ Transfer
G. Pouncefort	Steele Road, London	CDE Waste Processing/ Transfer
X – Bert Haulage Ltd	Neasden Goods Yard	CDE Waste Processing/ Transfer
X – Bert Haulage Ltd (Glynn Skips)	Fifth Way, Wembley	CDE Waste Processing/ Transfer
Biffa Waste Services Ltd	Wembley Transfer Station & Recycling Facilities	MSW&C&I Waste Processing/ Transfer
Seneca Environmental Solutions Ltd	Hannah Close, Neasden	MSW&C&I Waste Processing/ Transfer plus biomass CHP
Veolia	Veolia Transfer Station, Marsh Road	MSW&C&I Waste Processing/ Transfer
West London Waste Authority	Twyford Transfer Station	MSW&C&I Waste Processing/ Transfer
Metal & Waste Recycling Ltd	Mitre Works, Neasden Goods Yard	Metal Recycling & Vehicle Depollution
Brent Oil Contractors Ltd	Fourth Way Waste Transfer Facility	Oil Reclamation Facility
Wembley Car Breakers	Edwards Yard	Vehicle Depollution
Bridgemarts Ltd (Gowing & Pursey)	100 Twyford Abbey Road	CDE Waste Processing

Table 12: Safeguarded waste sites within Brent

13. Transportation

Evidence

- Brent Long Term Transport Strategy 2015-2035

- Brent Cycle Strategy 2016-2021
- Brent Walking Strategy 2017-2022
- WebCAT, Transport for London
- TFL Road Safety fact sheets, 2017
- TFL Route performance results for London Borough of Brent, June 2019
- Parking Strategy, 2015, Brent Council
- WestTrans Delivery and Servicing Plan Guidance
- Brent Council Annual Parking Reports
- Brent Local Implementation Plan 2019-2041

Evidence Gaps

- None

2. As shown in Figure 34, the most popular mode of transport for Brent residents is the car, accounting for 41% of trips originating in Brent per day. The least popular mode of transport for Brent residents was taxi. When the figures are combined, public transport (rail, underground/DLR and bus) account for a significant portion of trips made per day by Brent residents²².

²² Brent Local Implementation Plan 2019-2041

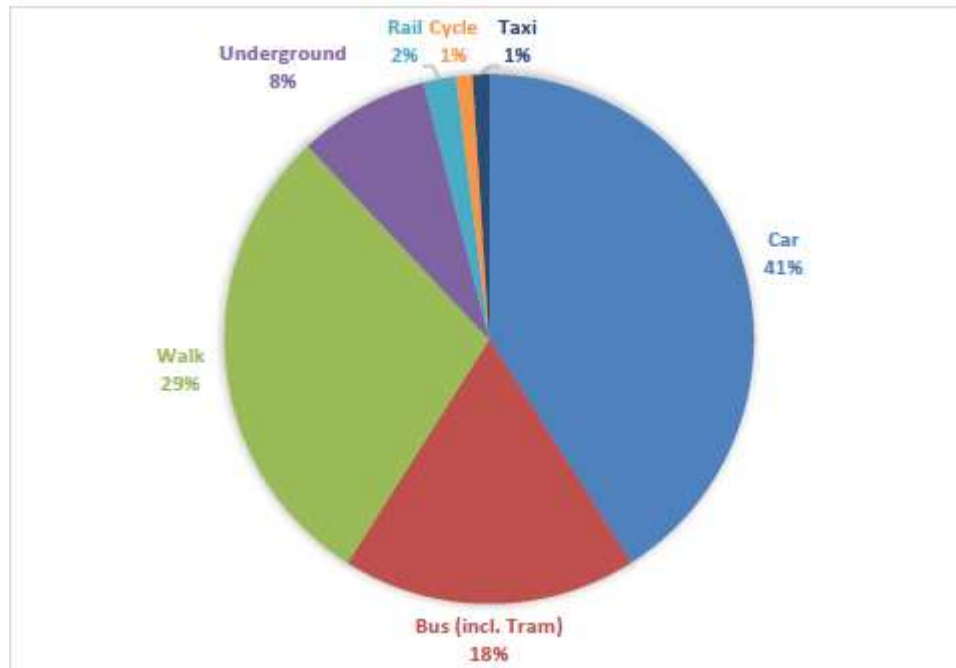


Figure 34: Mode share of Trips Originating in Brent (2017)

Road

- 13.3. Brent has a relatively limited high-order road network which plays an important role for freight and traffic. Its total road length is 15km TLRN, which consists of 53k of major roads and 434km of minor roads. This includes radial roads into Central London, such as the A5 (Edgware Road), A4088 (Dudding Hill Lane/Blackbird Hill) and A404 (Harrow Road), and Orbital Roads such as A406 (North Circular Road, Kingsbury Road) and A4127 (Sudbury Court Drive)

- 13.4. In 2013, 846 million vehicle kms were travelled in Brent, which equate to 2.9% of all London traffic. Half of all car journeys in Brent are less than five kilometres. ²³Brent is expecting high levels of growth over the next 20 years, which will put more pressure on the road network.
- 13.5. A key problem associated with car traffic within the borough is congestion. High levels of congestion reduce the quality of life of Brent residents and have a negative effect on economic growth. Congestion also suppresses the uptake of active travel modes by degrading the environment for cyclists and pedestrians. As shown in the following figures, there are a number of areas within Brent that have significant delays (during peak hours) as a result of congestion

Road Safety

- 13.6. As identified in the Council's Long Term Transport Strategy, there has been significant progress made in regards to road safety in Brent. Between 2004 and 2012, Brent saw 45% reduction in KSIs (killed or seriously injured) from road traffic collisions, which placed the borough 7th of the 33 London boroughs. During the same time period, London wide KSIs reduced by 28%. According to TFL Road Safety Fact Sheets, In Brent in 2017, 6 people were killed, 126 people were seriously injured, and 1026 were slightly injured. The total amount killed or seriously injured was the lowest since 2005.



Cycling

13.7. As shown in Figure 34, cycling only accounts for a small proportion of trips originating within Brent (1%). The Council seeks to increase this to 3% by 2020/21 and to 5% by 2025. The uptake of cycling varies within the borough; in the south of the borough cycling claimed 2-5% modal share journey, whereas in the north of the borough cycling only claimed 0-1% modal share journey. It is thought that around 32% of Brent households own at least one bicycle, according to the Brent Cycling Strategy. Brent has a large number of cycle parking spaces at stations, in high streets and other activity hubs. The Council aim to increase provision by 1000 spaces by 2021. The Brent Cycle Strategy found that concerns over road safety is the biggest issue which prevents people from cycling.

13.8. Existing and proposed cycle route in Brent are shown in Figure 36. Brent has two radial cycle routes and one orbital route forming part of the 900km London Cycle Network Plus (LCN+). Transport for London is also implementing a Quietway programme, which has connected Regent's Park and Gladstone Park, and will connect Kensal Town to Yiewsley (via Wembley).



Figure 36: Existing and proposed cycle routes within Brent

Walking

13.9. Figure 35: Congestion levels within Brent

through Brent. The Capital Ring, a 78 mile walking route which encircles London, connects South Kenton to Welsh Harp. As shown in Figure 34, pedestrian mode share accounted for 26.27% of all trips made by residents within the borough, and 26.78% of trips originating within the borough per day. Through the implementation of the walking strategy, the Council aims to increase this to 30% by 2021/22. The Brent Walking Strategy identified that poor quality or excessive street furniture such as advertising boards outside businesses, high vehicle speeds on local streets and insufficient lighting and footpaths through parks were identifies as specific barriers to walking.

Between 2005 and 2015 the number of pedestrian casualties in Brent has fluctuated. Although the number of pedestrians receiving fatal injuries in collisions with vehicles has decreased slightly, it still remains high. Brent aims to achieve zero pedestrian fatalities by 2021/22 and a reduction of 30% in the total number of casualties

Public Transport

13.10. 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 Railway services from High Wycombe to London Marylebone
- Southern Railway services from East Croydon to Milton Keynes Central
- London Bus Services throughout the borough

13.11. Public transport accounts for 33% of trips made by Brent residents each day, and 31% of trips originating within Brent each day. It is expected that the use of public transport will remain stable 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.

13.12. As shown in Figure 37, there are areas within Brent that have relatively high PTAL level i.e. Wembley and Kilburn. There are also areas which have poor access to public transport, and therefore low PTAL levels, such as Dollis Hill and Welsh Harp.

13.13. The mean excess waiting time for high-frequency bus routes has remained fairly consistent, remaining stable at 1 minute in 2010/11 and 1 minute between April and June 2019.²⁴

13.14. Major public improvement works have been undertaken. The most notable being the Wembley stadium and Wembley station. In addition, due to the increase in patronage on the London Overground, there has been considerable investment in new trains, platform extensions and station upgrades to meet demand. The implementation of the London Bus Priority Network (LBPN) has resulted in major benefits in Brent particularly on the Edgware Road and Harrow Road corridors. However, even with all these improvements, Figure 37 illustrates that there are still areas with poor public transport accessibility (those in dark blue), showing that significant areas remain deficient particularly to the north. It should be noted that the draft London Plan contains a

²⁴ TFL Route performance results for London Borough of Brent, June 2019

commitment to introducing passenger trains on the Dudden Hill Freight Line, which is being referred to as the West London Orbital. This should result in improvements to PTAL levels within the eastern region of the borough.

- 13.15. The Brent Long Term Transport Strategy identified the Metropolitan line as being a key strength of public transport within the borough; it provides a fast and efficient link into Central London and is currently under capacity. In addition, due to the growth in patronage on the London Overground, there has been considerable investment in new trains, platform extensions and station upgrades to meet demand. The Strategy also states that the greatest weakness of public transport in Brent is in bus services due to the following reason: *“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”*. However, through the Bus Accessibility Programme 94% of bus stops in Brent are now accessible for people with mobility impairments.

Freight

- 13.16. Brent has a number of industrial estates that both rely on and generate freight movement. 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. In addition, vehicles which deliver to private residences and construction traffic also contribute to the number of vehicles movements on the road network. As identified in the Long-term Transport Strategy, *“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.”*

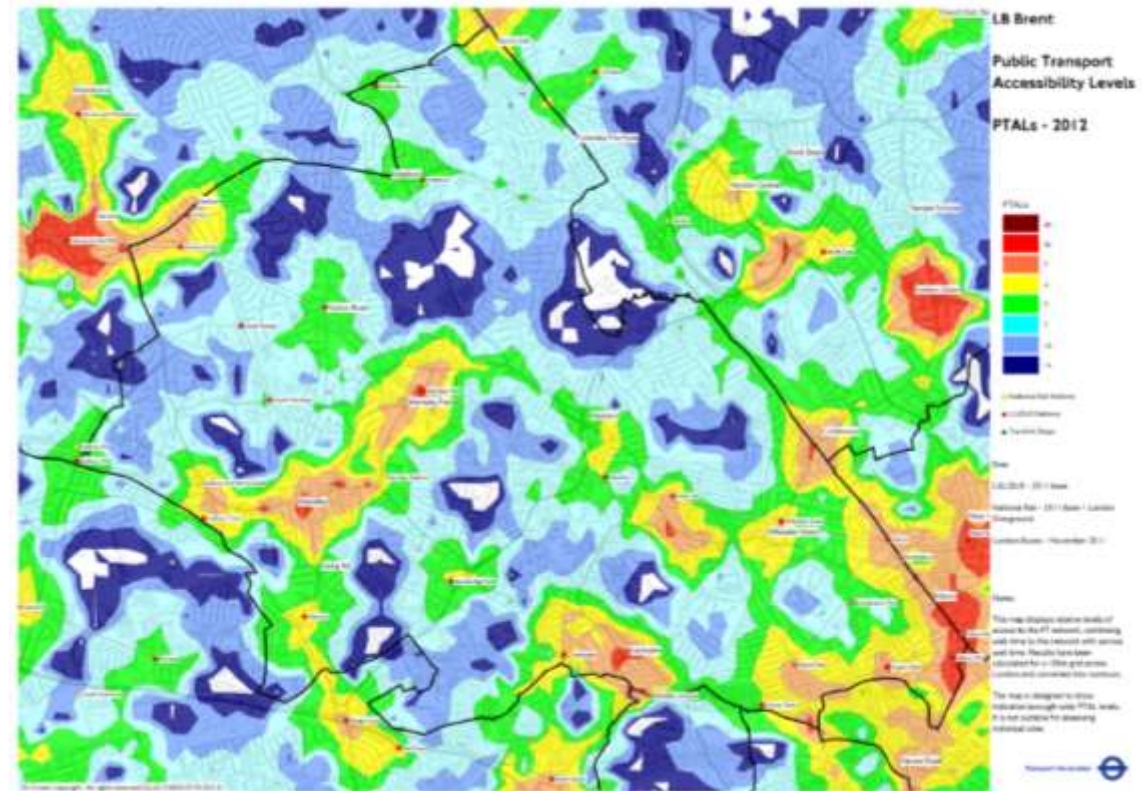


Figure 37: PTAL levels within Brent

Parking

- 13.17. Parking is an important part of the transport infrastructure for many Brent residents and can have a significant impact on quality of life. Demand for parking in Brent is high, as in other London Boroughs. The Council seeks to manage this demand through the use of parking controls and traffic regulations.
- 13.18. According to the Brent Parking Strategy (2015), a survey in 2014 indicated that there were approximately 88,000 on-street parking places, both controlled and uncontrolled, available across the whole of Brent. Over large areas of the borough, particularly in the north and west, on-street parking remains available to motorists free of charge or restriction. In these areas, there are only limited lengths of kerbside waiting and loading restrictions in place on-street including those necessary to ensure road safety. The main demand for both on-street and off street parking in the borough's town centres occurs from Monday to Saturday across the working day between 8am and 6:30pm, on Sundays during the retailing hours of 10am-5pm, and during special event.
- 13.19. The Council operates 11 public car parks across the borough which has a total of 714 spaces. There are also over 700 spaces in privately owned car parks.
- 13.20. The Council has introduced a number of measures to manage the high demand for kerb space. Parking in the south-eastern part of the borough, is managed through Controlled Parking Zones. Other parts of the borough also have residential controls; these typically cover areas near high street locations and/or tube and railway stations. The Council manages 40 Controlled parking Zones (CPZs) across the borough, serving 56,000 households with over 33,000 on-street parking spaces. Specific times of operation vary but the majority are in operation through the day, from Monday to either Friday or Saturday.

14. Noise

Evidence

- London Noise Mapping Service (www.londonnoisemap.com)

- 14.1. There are numerous sources of noise pollution in the borough. These sources include ambient noise, which is long-term 'background' noise, which can originate from transport and industry. These ambient noises can be supplemented by more periodic local (or neighbour) noise such as construction works, roadworks, late night venues, public events, street activities and ventilator/extractor units.
- 14.2. Areas adjacent to the North Circular Road in Brent have been identified as amongst the most affected by traffic noise in the UK. In addition, development around Wembley can be impacted by noise on event days at the National Stadium.
- 14.3. In light of the guidance contained in the Noise Action Plan: Agglomerations published by DEFRA in January 2015, the Council has identified quiet areas. These are areas of tranquillity, usually open spaces and green network areas, which have remained relatively undisturbed by noise and have recreational and amenity value for this reason. The boundaries of the borough's Quiet Areas are consistent with the open space designations for Fryent Country Park, the Welsh Harp, Roundwood Park/Willesden New Cemetery, Paddington Cemetery and Alperton Cemetery.

15. Local Economy

Evidence:

- Brent Employment Land Demand Study, URS, 2015
- ONS Annual Population Survey
- Retail and Leisure Needs Study, 2018, Urban Shape
- Brent Workspace Study, 2017, Regeneris
- GLA Brent London Borough Employment
- Brent Responsible Growth Strategy 2018-2038, RGS, May 2018
- Annual Monitoring Reports
- NOMIS Official Labour Market Statistics
- NOMIS Labour market profile (Brent)

Evidence Gaps:

- None identified

15.1. Table 14 compares the occupation structure of Brent's residents with the London averages from April 2018 – March 2019. Brent's total workforce is approximately 164,830. Standard occupational classification (SOC) 2010 major groups 1-3 forms the largest proportion of Brent's resident workforce, totalling 72,800 which is equivalent to 44.2%. However, the proportion of the resident workforce in SOC major groups 1-3 is significantly lower than the London average, which is 57.8% of all persons in employment. There are a number of SOC groups that are over-represented in Brent, in comparison to the London average. For example, the skilled trade occupations accounted for 9.9% of the borough's resident workforce, compared to 7% across London.²⁵

²⁵ NOMIS Official labour market statistics

SOC Major Group	Occupation	Brent (number)	Brent (%)	London (%)
1	Managers and senior officials	15,800	9.5	12.4
2	Professional occupations	33,330	20.2	26.5
3	Associate professional and technical	23,800	14.4	18.6
4	Administrative and secretarial	12,100	7.3	9.1
5	Skilled trades occupations	16,400	9.9	7
6	Caring, Leisure and Other Service Occupations	14,200	8.6	7.2
7	Sales and Customer Service	14,100	8.5	5.7
8	Process Plant and Machine Operatives	12,100	7.3	4.6
9	Elementary Occupations	23,000	14	8.4
	Total	164,830	100	100

Table 13: Occupation structure of Brent's residents

15.2. As identified in Figure 38, Brent's key employment sectors are 'Motor Trades' (16%), 'Retail' (10%) and 'Education' (9%) and 'Business Administration and Support Services' (9%).²⁶

²⁶ NOMIS official labour market statistics

Brent Employment Sectors (2017)

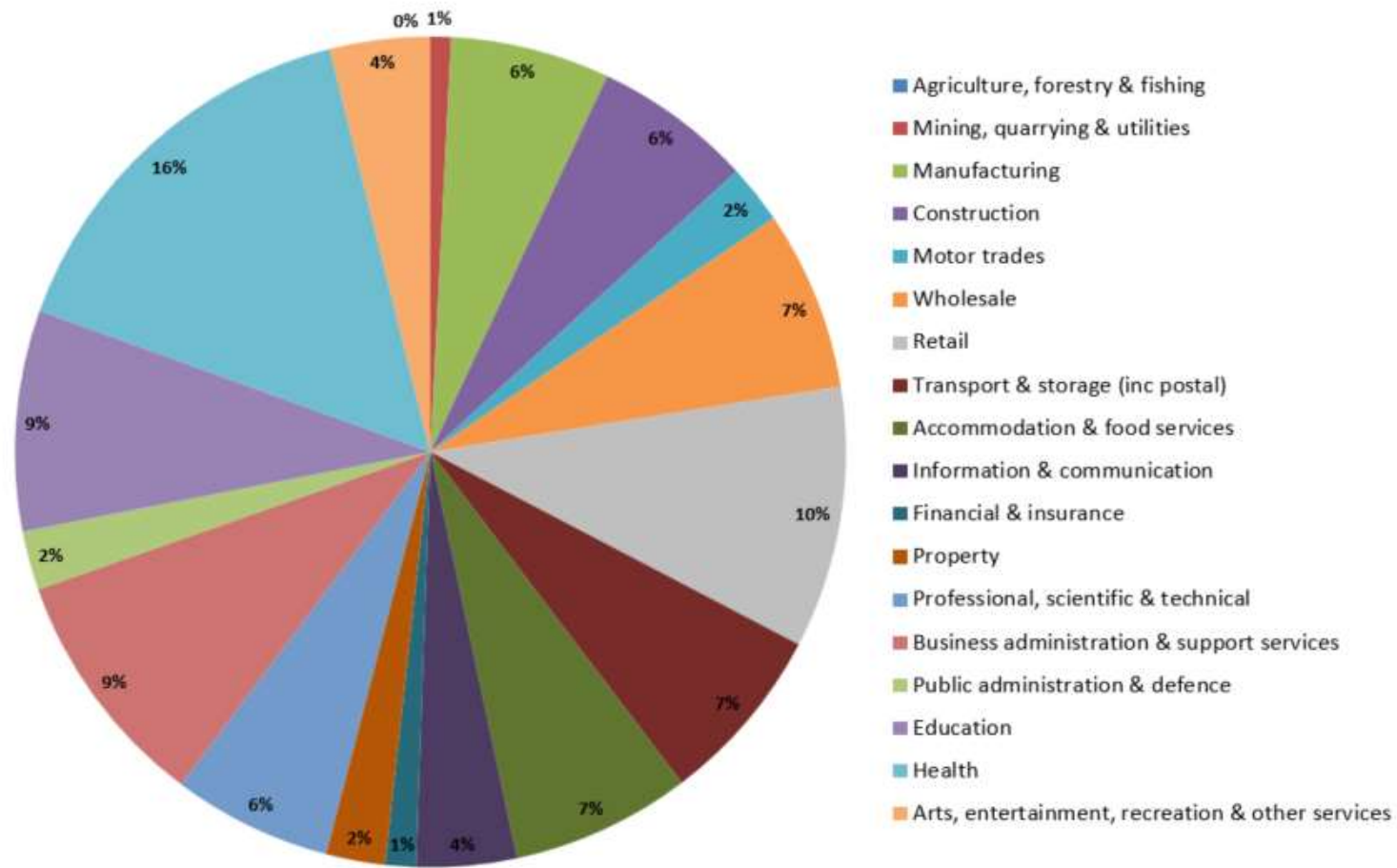


Figure 38: Brent's employment sectors

15.3. Brent's designated employment sites comprise Strategic Industrial Land (SIL), which are designated in the London Plan due to their importance to the London Economy, and Locally Significant Industrial Sites (LSIS), which are of strategic importance to employment in the borough. The location of the borough's strategic SIL and LSIS are depicted in Figure 39. In addition, there are smaller employment sites distributed throughout the borough, referred to as Local Employment Sites. There is currently a total of 395ha of land current in active industrial use in Brent. According to the Employment Land Demand Study (2015), SIL accounts for around 75% of the borough's total industrial land portfolio, LSIS around 14% and the remainder is contained within Local Employment Sites.

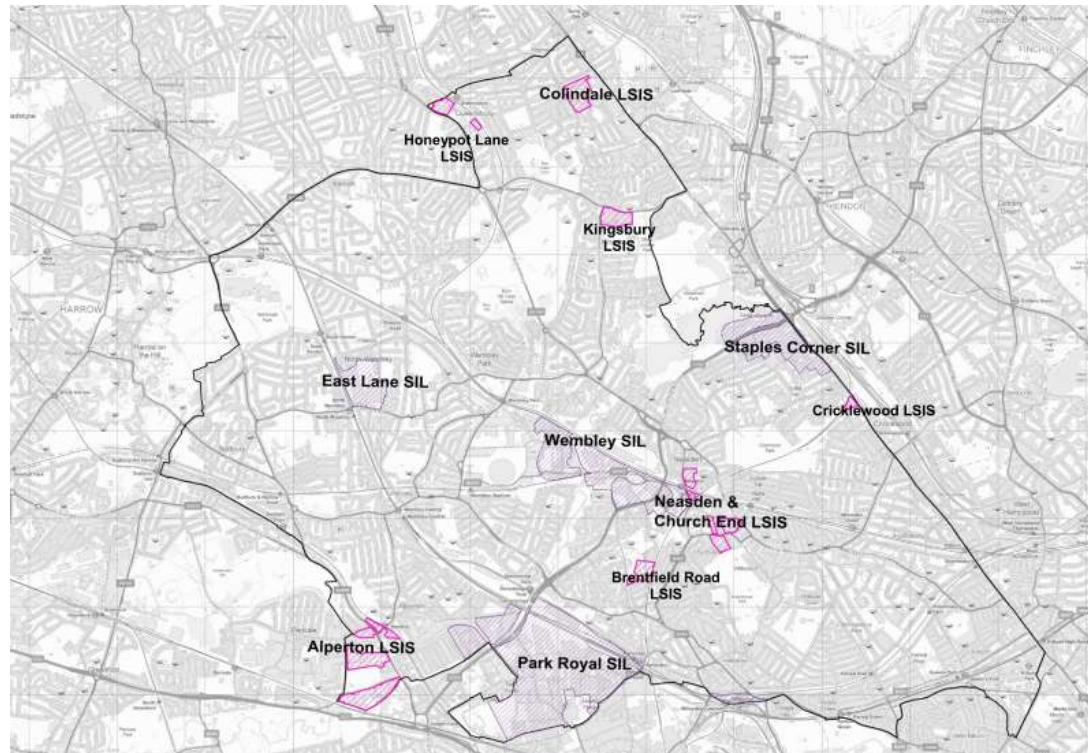


Figure 39: Location of SIL and LSIS in Brent

Figure 40: Brent's IMD, 2019Figure 41: Location of SIL and LSIS in Brent

Figure 42: Brent's IMD, 2019

Figure 43: Brent's IMD, 2019Figure 44: Location of SIL and LSIS in Brent

Figure 45: Brent's IMD, 2019Figure 46: Location of SIL and LSIS in Brent

Figure 47: Brent's IMD, 2019

Figure 48: Brent's IMD, 2019

Figure 49: Brent's IMD, 2019

Figure 50: Brent's IMD, 2019Figure 51: Location of SIL and LSIS in Brent

Figure 52: Brent's IMD, 2019Figure 53: Location of SIL and LSIS in Brent

Figure 54: Brent's IMD, 2019

Figure 55: Brent's IMD, 2019Figure 56: Location of SIL and LSIS in Brent

- 15.4. The Employment Land Demand Study identified that there is approximately 27,700 sqm of gross office B1a floorspace in Brent's town centres, and a further 74,000 sqm in predominantly in industrial clusters. It also identified additional demand for between 32,600 sqm and 52,350 sqm of office floorspace in the borough to 2029. However, prior approvals have resulted in a net loss of office floorspace. For example, during the 2017/18 monitoring period, there was a net loss of 6,018sqm of office floorspace, 52% of which was lost due to prior approvals²⁷ resulting in the conversion to residential, redevelopment to residential and to a lesser extent conversion to employment uses or mixed use development.
- 15.5. As identified in Brent Employment Land Demand Study (2015) VAT registration and de-registration rates for Brent provide an indication of the entrepreneurial characteristics of the borough. Published data indicates that, in 2013, there were 2,515 registrations and 1,150 de-registrations, resulting in a net gain of 954 businesses. This corresponds to 6.9% of the total stock (13,915 businesses), a rate of churn similar to levels across London (7.3%).
- 15.6. The size of firms operating within Brent are identified in Table 15. Micro businesses (those which employ up to 9 people) form a significant proportion of the borough's business stock – this type of business made up 89.5% of all businesses within the borough in 2018. There has been steady growth in the amount of micro businesses within the borough since 2015. Brent has a greater share of micro businesses in comparison to the London average. Small and medium sized businesses represent a small share of the total stock of businesses within Brent. Large businesses represent the smallest share of business stock within the borough, which is similar trend to that across London.

	Brent (Numbers)				Brent (%)				London (%)			
	2015	2016	2017	2018	2015	2016	2017	2018	2015	2016	2017	2018
Local Businesses												
Micro (0-9)	12835	13815	14620	14730	88.5	89.3	89.6	89.5	86.2	86.8	87.3	87.1
Small (10-49)	1310	1285	1320	1350	9	8.3	8.1	8.2	11	10.5	10.1	10.3
Medium (50-249)	305	315	310	325	2.1	2	1.9	2	2.4	2.3	2.2	2.2
Large (250+)	50	50	60	55	0.3	0.3	0.4	0.3	0.4	0.4	0.4	0.4

²⁷ Brent Annual Monitoring Report, 2017/18

Table 14: Size of firms within Brent

- 15.7. The percentage of economically active people within Brent between Oct 2018 and Sept 2019 was 77.1%. The economic activity rates between male and female varies significantly – the male activity rate was 84.6% compared to 68.9% for females. The male activity rate was slightly higher than the London average and the female activity rate lower than the London average. In the same year ending Sept 2019, the unemployment rate in Brent was 4%, which was lower than the London average (4.6%).²⁸ In December 2015, the youth unemployment claimant rate was 2.6, which is lower than the London average of 3.6.
- 15.8. In 2019, the average gross weekly pay in Brent was estimated to be £610.20 for full time workers. This compares to a weekly London average of £699.20.²⁹
- 15.9. According to the GLA London Borough Profiles, unlike employment rates, the difference between the gross annual pay for male and females is relatively small – the gross annual pay for males in 2016 was £30,129 and the gross annual pay for females was £29,600. However, the gross annual pay for males is significant lower than the London average of £36,697. There is not a significant difference between the gross annual pay for females in the borough and the London average for females (£30,979).

²⁸ NOMIS Labour market profile, Brent

²⁹ NOMIS Labour market profile, Brent

16. Deprivation

Evidence:

- Index of Multiple Deprivation, 2019
- Joint Strategic Needs Assessments, 2015
- Sub Regional Fuel Poverty Data (2017), Department for Business, Energy and Industrial Strategy 2019
- End Child Poverty (endchildpoverty.org.uk)
- Children in Poverty for Boroughs and Wards in London dataset 2006-2016, HMRC, updated 2019
- Brent Inclusive Growth Strategy Research Base, 2019

Evidence Gaps:

- None identified

16.1. The Indices of Multiple Deprivation (IMD) 2019 is a measure of relative deprivation of small areas (referred to as Lower Super Output Areas (LSOA)) within England. It combines information from 7 domains, each of which measure a different type or dimensions of deprivation, to provide an overall relative measure of deprivation.

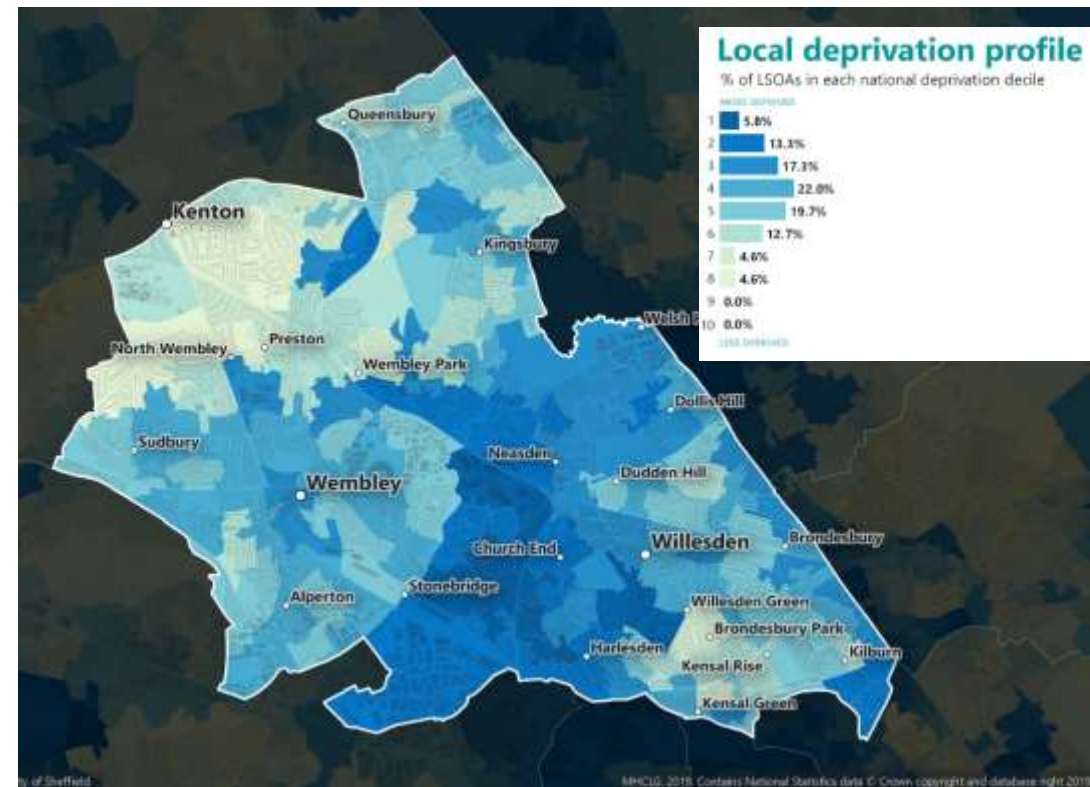


Figure 87: Brent's IMD, 2019

Figure 88: Brent's IMD, 2019

Figure 89: Brent's IMD, 2019

Figure 90: Brent's IMD, 2019

Figure 91: Brent's IMD, 2019

Figure 92: Brent's IMD, 2019

Figure 93: Brent's IMD, 2019

Figure 94: Brent's IMD, 2019

Figure 95: Brent's IMD, 2019

Figure 96: Brent's IMD, 2019

Figure 97: Brent's IMD, 2019

Figure 98: Brent's IMD, 2019

16.2. Brent's national rank was the 49th most deprived borough in the UK. Brent has 173 LSOAs, of which 10 are within the 10% most deprived LSOAs in the country. Brent does not have any LSOAs that are within the 10% least deprived LSOAs in the country. In the domain 'Barriers to housing and Services', Brent was ranked the 4th most deprived borough.

16.3. In 2015, the claimant rate for Housing Benefit was 30% in Stonebridge and Harlesden, 6% in Northwick Park and under 5% in Kenton. The rate for out of work benefits was nearly 29% in Harlesden and Stonebridge, under 9% in Northwick Park and under 8% in Kenton. As of March 2018, there were 34,488 housing benefit claimants in Brent.³⁰

16.4. Households are considered by the Government to be in fuel poverty if they would have to spend more than 10% of their household income on fuel to keep their home in a 'satisfactory' condition. In England, this is defined as 21°C in the living room and 18 C in other occupied rooms. According to the Department for Business, Energy and Industrial Strategy, in 2017, it was estimated that 16,929 households were in fuel poverty in Brent, which equates to 14.9% of all households. This is significantly higher than both the London average (11.8%) and England average (11.0%) in 2017 and represents an increase since 2015.

16.5. As indicated by Table 16, levels of child poverty in Brent 2011-2016 were higher than the London and England average. The 'Children in Low-Income Families', which is the Government's current preferred measure of child poverty, shows the proportion of children living in families in receipt of tax credits where their reported income is less than 60% of the UK median income. This measure provides a broad proxy for relative low income child poverty as set out in the Child Poverty Act 2010.

	Children in Child Benefit Families						% of children in low-income families					
	Brent		London		England		Brent		London		England	
	U16	All children	U16	All children	U16	All children	U16	All children	U16	All children	U16	All children
2011	63615	73405	1611800	1853670	9855830	11537505	28.1%	28.8%	26.5%	26.7%	20.6%	20.1%
2012	65345	75315	1636025	1880560	993640	11602370	24.8%	25.0%	23.7%	23.5%	19.2%	18.6%
2013	66265	76570	1641015	1892710	9957705	11649215	21.0%	21.3%	21.8%	21.8%	18.6%	18.0%

³⁰ Brent Inclusive Growth Strategy Research Base, 2019

2014	66455	76890	1635720	1888430	9956030	11638995	23.4%	24.3%	23.4%	23.9%	20.1%	19.9%
2015	66760	77200	1633390	1881900	9969960	11603520	17.6%	18.2%	18.8%	19.2%	16.8%	16.6%
2016	67330	77815	1638365	1884170	10017620	11609460	18.0%	18.9%	18.8%	19.3%	17.0%	17.0%

Table 15: Levels of child poverty within Brent

16.6. Table 17 shows levels of child poverty at a ward level, published by End Child Poverty (May 2019). As shown in the table, the highest rates of child poverty in the borough are in Dollis Hill, Alperton and Kilburn which after housing costs scored 51%, 50% and 49% respectively. The wards which have the lowest rates of Child Poverty are Northwick Park, Queens Park and Kenton, which after housing costs scored 32%, 32% and 33% respectively. Table 17 also highlights the impact that housing prices have on child poverty with rates increasing over 10% in all wards within the borough.

Local Authority and wards	Before Housing Costs	After Housing Costs
Brent	22.31%	43.19%
Alperton	23.3%	50%
Barnhill	23.1%	44%
Brondesbury Park	17.4%	34%
Dollis Hill	22.2%	51%
Dudden Hill	25.3%	46%
Fryent	21.8%	44%
Harlesden	26.0%	48%
Kensal Green	23.2%	39%
Kenton	18.5%	33%
Kilburn	23.2%	49%
Mapesbury	23.6%	42%
Northwick Park	20.1%	32%
Preston	24.8%	43%
Queens Park	17.5%	32%
Queensbury	22.6%	42%
Stonebridge	16.8%	48%

Local Authority and wards	Before Housing Costs	After Housing Costs
Sudbury	21.1%	42%
Tokington	23.5%	46%
Welsh Harp	23.5%	48%
Wembley Central	23.7%	47%
Willesden Green	27.4%	47%

Table 16: Levels of child poverty at ward-level

16.7. The Council has adopted a Child Poverty Strategy (2011-2021) which seeks to achieve the following vision:

“For no children or young people to be disadvantaged by poverty in 20-21 by breaking the cycle of deprivation and mitigating poor children becoming poor adults. Over the next decade [the Council] will ensure that each child has the best possible start in life and not be disadvantaged by family circumstance or background”.

16.8. To achieve the above vision, the strategy identified the following six priorities: 1) Reduce poverty levels of children living in low income households, 2) Supporting troubled families, 3) Reduction in the NEET group, 4) Improve financial capacity of parents, 5) Support looked after children and children at the edge of care, and 6) Improve the health and wellbeing of children with a focus on reducing obesity, tooth decay and poor mental health.

17. Housing

Evidence Base:

- 2001 and 2011 Census
- Housing Benefit caseload statistics, Department for Work and Pensions, updated August 2018
- London Borough of Brent Strategic Housing Market Assessment, SHMA, 2018
- GLA Brent Borough Profile, 2017
- Average yearly and weekly gross earnings, ONS, 2019
- GLA short term population and household projections, 2016
- House Price Index, House Price Statistics, HM Land Registry 2019
- West London Gypsy and Traveller Accommodation Assessment, 2018, ORS
- Registered Provider and Local Authority average rents, MHCLG, 2018
- Brent Inclusive Growth Strategy Research Base, 2019

Evidence Gaps:

- None identified

17.2. The 2011 Census counted 110,286 households in Brent, an increase of 10.3% from the previous census. The 2017 GLA short-term trends estimate that in 2019, there will be 125,929 households in the borough. The GLA estimate that the number of households in Brent is expected to increase to 168,376 by 2050.

17.3. Between 2001 and 2011, there was a significant increase (35%) in the amount of flats, maisonette or apartments (purpose-built block of flats or tenement) in the borough, which resulted in this accommodation type making up a third of the borough's total housing stock. There was also a growth in the amount of detached housing in the borough, which increased from 3317 in 2001 to 7402 in 2011. This represents an increase by 11.86%. During the same time, there was 53.6% reduction in the amount of caravan or other mobile or temporary structure household spaces. There was also a reduction in the amount of semi-detached properties within the borough; in 2001 there was 28,303 semi-detached dwellings, which had decreased to 27,064 by 2011.

17.4. As shown in Table 18, there is variation in the housing stock across the borough. Within the more urban areas of the borough, which are typically within the southern and central wards (i.e. Wembley Central, Tokyngton, Kilburn and Willesden Green), flats form the highest proportion of the wards housing stock. As you move northwards through the borough, the more suburban wards (i.e. Northwick Park, Fryent and Kenton) have a significant proportion of their housing stock formed of houses.

Wards	Flat	House	Maisonette	Other
Alperton	54.9%	44.0%	0.9%	0.3%
Barnhill	45.3%	49.4%	3.2%	2.2%
Brondesbury Park	67.9%	27.4%	3.9%	0.8%
Dollis Hill	44.4%	52.7%	2.7%	0.2%
Dudden Hill	48.7%	47.1%	3.8%	0.4%
Fryent	41.0%	55.3%	2.3%	1.3%
Harlesden	73.2%	19.5%	6.0%	1.3%
Kensal Green	66.4%	28.9%	3.6%	1.0%
Kenton	20.9%	75.2%	0.5%	3.4%
Kilburn	76.9%	8.9%	13.4%	0.7%
Mapesbury	75.7%	18.9%	4.4%	1.0%
Northwick Park	23.9%	67.9%	1.5%	6.8%
Preston	40.6%	55.7%	2.1%	1.7%
Queens Park	60.2%	32.3%	5.6%	1.9%
Queensbury	38.6%	55.4%	5.6%	0.4%
Stonebridge	62.6%	30.8%	6.0%	0.5%
Sudbury	48.6%	43.6%	2.2%	5.6%
Tokyngton	80.2%	19.3%	0.2%	0.3%
Welsh Harp	44.5%	47.8%	1.5%	6.3%
Wembley Central	64.5%	33.0%	2.1%	0.3%
Willesden Green	75.5%	19.2%	4.5%	0.7%
Grand Total	58.9%	35.8%	3.8%	1.5%

Table 17: Housing stock within Brent

- 17.5. The 2018 SHMA also identified the tenure mix and size for market and affordable housing need in Brent between 2016-41 (Table 19). It stated that there is “a significant need for family sized housing to be provided as part of any housing mix. The high need for larger affordable housing units is driven by a need to address overcrowding for those in need of affordable housing. “The SHMA also indicated that there is likely to be a “continued (and possibly growing) role for HMOs”.

	Brent Total	Percentage of OAN (%)
Market Housing		
1 bedroom	3700	7.7
2 bedrooms	5300	11.0
3 bedrooms	13500	28.1
4 bedrooms	3300	6.9
5 bedrooms	100	0.2
Total Market Housing	25,900	54
Affordable Housing		
1 bedroom	4200	8.8
2 bedroom	9000	18.8
3 bedroom	5800	12.1
4 bedroom	2500	5.2
5 bedroom	600	1.3
Total Affordable Housing	22,100	46
TOTAL	48,000	100

Table 18: Tenure mix and size for market and affordable housing need in Brent, 2016-2041

Housing Delivery

- 17.6. The 2018 SHMA identifies that the “Full Objective Assessed Need for Housing in Brent to be to a rounded figure of 48,000 dwellings over the 25-year Plan period (2016-2041), which is equivalent to an average of 1920 dwellings per year. This includes the Objectively Assessed Need for Affordable Housing of 22,100 dwellings over the same period, equivalent to an average of 884 dwellings per year, representing 46% of the OAN for Brent”. It should be noted that the total figure is lower than the current draft London Plan housing target for Brent (2,915 dwellings per annum). However, the 2018 SHMA notes that this figure is “a supply driven capacity one which would see some of the wider needs of West London met in Brent”.

17.7. As shown in the Figure 41, there has only just been a positive performance against the borough's housing targets. Such a significant increase in completions in the 16/17 year is due to a large amount of student housing being completed within the Wembley area.³¹

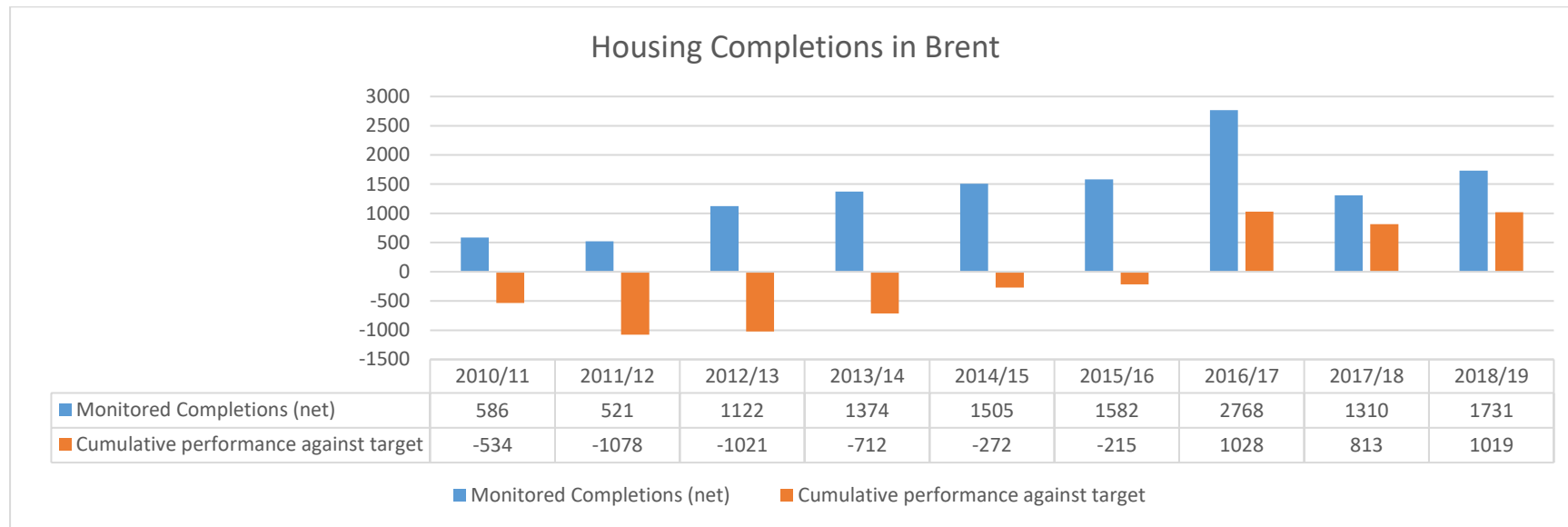


Figure 103: Housing completions in Brent

Figure 104: Average household size, 2011-2050Figure 105: Housing completions in Brent

Figure 106: Average household size, 2011-2050

Figure 107: Housing benefit claimants by tenure, May 2018Figure 108: Average household size, 2011-2050Figure 109: Housing completions in Brent

Figure 110: Average household size, 2011-2050Figure 111: Housing completions in Brent

Figure 112: Average household size, 2011-2050

Household Size

- 17.8. Between 2001 and 2011 the mean household size in Brent went from 2.6 to 2.8³². During this period all wards, other than Brondesbury Park, Northwick Park and Queens Park, had a positive change in household size. Alperton and Sudbury saw the greatest increases to 3.4 and 3.1 persons respectively, which equated to an increase of half a person per household.
- 17.9. As shown in Figure 42, it is predicted that by 2050 the average household size will fall to 2.3. The average household size in Brent is, and will continue to remain higher than the London average household size.³³

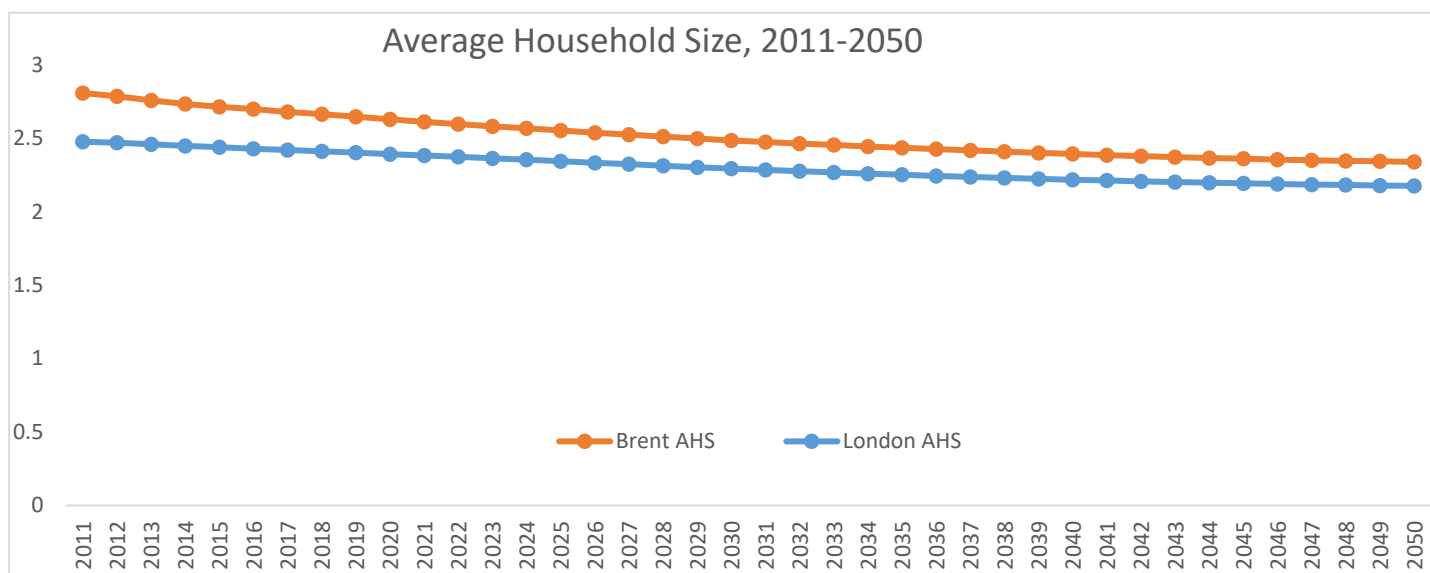


Figure 183: Average household size, 2011-2050

Figure 184: Housing benefit claimants by tenure, May 2018Figure 185: Average household size, 2011-2050

³² Population Figure 186: Housing benefit claimants by tenure, May 2018

³³ GLA short

Figure 187: Housing benefit claimants, November 2008 - May 2018Figure 188: Housing benefit claimants by tenure, May 2018Figure 189: Average household size, 2011-2050

Household Tenure

17.10. At the time of the 2011 Census, 42.9% of Brent's population owned their house. This is a decrease of 11.6% from the 2001 Census, where 57.7% of Brent's households were considered to be part of the owner occupied dwellings category. Furthermore, the fall in owner occupation rates have been above the national average – 63.3% of England's population owned their house in 2011, compared to approximately 68% in 2001. Since the 2001 Census, there has been a significant tenure shift, with the private rented sector seeing a 10.6% increase to 30.1% (33,181 dwellings). While this is significantly higher than the England average, it is in line with the London average.

17.11. However, there are significant differences in the tenure pattern across the borough. Highest levels of owner occupation are seen in Kenton (73%) and Northwick Park (62%), with much lower levels in Harlesden (22%) and Stonebridge (18%). Similar contrasts exist for social and private renting. Stonebridge has the highest proportion of social renting (62%), followed by Kilburn (45%), while Tokyngton (12%) and Kenton (5%) have the lowest levels. Private renting is highest in Mapesbury (45%) and Willesden Green (43%) and lowest in Northwick Park (19%) and Stonebridge (15%).

Affordability

17.12. The predicted increases in London and Brent's population is likely to have implication on the affordability of housing. For the majority of the period between January 2013 and December 2019, median house prices in Brent have been above the London average and significantly above the England average house price. In the year ending December 2019 the median house price in Brent was £488,680, compared to a London median value of £475,458 and an England median value of £251,222.³⁴

17.13. As shown in Figure 44, the amount of people claiming housing benefit has steadily increased since 2008, but appears to have plateaued since 2015. Figure 43 shows that in May 2018 there was 34,581 housing benefit claimants, of which 52% were within the social rented sector and 48% were within the private rented sector.³⁵

³⁴ House Price Index, House Price Statistics, HM Land Registry

³⁵ Housing Benefit caseload statistics, DWP

Figure 255: Housing benefit claimants by tenure, May 2018

Figure 256: Housing benefit claimants, November 2008 - May 2018
Figure 257: Housing benefit claimants by tenure, May 2018

Figure 258: Housing benefit claimants, November 2008 - May 2018

Figure 259: Housing benefit claimants, November 2008 - May 2018
Figure 260: Housing benefit claimants by tenure, May 2018

Figure 261: Housing benefit claimants, November 2008 - May 2018
Figure 262: Housing benefit claimants by tenure, May 2018

Figure 263: Housing benefit claimants, November 2008 - May 2018

Figure 264: Housing benefit claimants, November 2008 - May 2018

Figure 265: Housing benefit claimants, November 2008 - May 2018

Figure 266: Housing benefit claimants, November 2008 - May 2018
Figure 267: Housing benefit claimants by tenure, May 2018

Figure 268: Housing benefit claimants, November 2008 - May 2018
Figure 269: Housing benefit claimants by tenure, May 2018

Figure 270: Housing benefit claimants, November 2008 - May 2018

Housing Benefit Claimants. November 2008 - May

Figure 303: Housing benefit claimants, November 2008 - May 2018

Figure 304: Housing benefit claimants, November 2008 - May 2018

Figure 305: Housing benefit claimants, November 2008 - May 2018

Figure 306: Housing benefit claimants, November 2008 - May 2018

Figure 307: Housing benefit claimants, November 2008 - May 2018

Figure 308: Housing benefit claimants, November 2008 - May 2018

Figure 309: Housing benefit claimants, November 2008 - May 2018

Figure 310: Housing benefit claimants, November 2008 - May 2018

Figure 311: Housing benefit claimants, November 2008 - May 2018

Figure 312: Housing benefit claimants, November 2008 - May 2018

Figure 313: Housing benefit claimants, November 2008 - May 2018

Figure 314: Housing benefit claimants, November 2008 - May 2018

17.14. The median monthly private rent in the 12 months to Quarter 1 of 2019 was £1,500³⁶, while the median average annual pay for a Brent resident, as at 2018, was estimated to be £23,423. Meanwhile, the median weekly gross pay is £480.00 (or £1951.92 per month).³⁷ An average monthly private rent of £1500 equates to 76.8% of the median gross salary. Most assessments of affordability suggest that rents at 35-40% salary are reasonable.

17.15. Even in the affordable housing sector, affordability is strained. The average weekly Registered Provider (RP) rent in 2018 was £125.60 while the average local authority rent was £113.66.³⁸ In 2015, the gross weekly salary for a household in the lowest 10% of earners – a category into which many social housing tenants fall – was £141.40, representing 87.1% of earnings at that time, and representing 85.8% of earnings in 2011. Although the change is not as marked as in other sectors, there is still upward pressure on rents increasing reliance on housing benefit.

17.16. As of April 2019, there were 3161 households in bands A-C on Brent's housing register (those considered to be in housing need).³⁹

17.17. There is one gypsy and traveller site in the borough at Lynton Close. According to the West London Gypsy and Traveller Needs Assessment (2018), there were no households interviewed in Brent that met the PPTS planning definition and as such there is no current or future need for additional pitched in the London Plan period to 2041. However, it was not possible to determine the PPTS planning status of 11 households at Lynton Close (unknown Gypsies and Travellers), and the needs of these households still need to be recognised by the GTAA as they are believed to be Gypsies and Travellers and may meet the PPTS definition. Should further information be made available to the Council that would allow for the PPTS definition to be applied to these unknown households, the overall level of need could rise up to 4 pitches from new household formation. There were no Travelling Show-people identified in Brent.

³⁶ Valuation Office Agency, Q1 2019

³⁷ Average yearly and weekly gross earnings, ONS

³⁸ Local Authority and Registered Provider average rents, MHCLG, 2018

³⁹ Brent Inclusive Growth Strategy Research Base, 2019

Appendix 2 – Relevant Plans, Programmes and Policies

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
International/European		
<i>SEA Directive 2001</i> European Directive 2001/42/EC	For public plans and programmes requires an environmental report to be prepared in which the likely significant effects on the environment and the reasonable alternatives of the proposed plan or programmes are identified.	The IIA will accord with the requirements of the Directive to assess significant effects of Plan and reasonable alternatives.
<i>The Habitats Directive</i> European Directive 92/43/EEC and amended by 97/62/EC on the conservation of natural habitats	The aim of the Habitats Directive is to ensure the conservation of a wide range of rare, threatened or endemic animal and plant species across Europe. As part of this directive, a network of sites known as Natura 2000 sites or European sites (Special Areas of Conservation (SACS), Special Protection Areas (SPAs) and Ramsar Sites) was established.	IIA to incorporate HRA assessing impact of proposed development/policies on National and European Sites protected under the Directive. The IIA to incorporate an objective on protecting and maintaining the natural environment and important landscape features The development proposals contained within the Local Plan should not have any adverse impact on Natura 2000 sites or European Sites.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
European Directive: Environmental Noise Directive 2002/49/EC	The aim of the Environmental Noise Directive (END) is to “<i>define a common approach intended to avoid, prevent or reduce on a prioritised basis the harmful effects, including annoyance, due to exposure to environmental noise</i>”. The directive also aims to provide a basis for developing community measures to reduce noise emitted by the major sources, in particular road and rail vehicles and infrastructure, aircraft, outdoor and industrial equipment and mobile machinery. The Environmental Noise Directive focuses on three action areas: • the determination of exposure to environmental noise • ensuring that information on environmental noise and its effects is made available to the public • preventing and reducing environmental noise where necessary and preserving environmental noise quality where it is good The Directive requires Member States to prepare and publish, every 5 years, noise maps and noise management action plans for: • agglomerations with more than 100,000 inhabitants • major roads (more than 3 million vehicles a year) • major railways (more than 30,000 trains a year) • major airports (more than 50,000 movements a year, including small aircrafts and helicopters)	The IIA to incorporate an objective which considers the potential effects of the Local Plan in terms of environmental noise. The Local Plan should seek to minimise the adverse impacts of environmental noise for people living and working in, and visiting the area. The Local Plan should seek to prevent and reduce environmental noise and preserve quiet areas.
EU Directive on Ambient Air Quality and Management 96/62/EC	Merges four directives into a single directive on air quality. It sets standards and target dates for reducing concentrations of fine particles, which together with coarser particles known as PM₁₀ already subject to legislation, are among the most dangerous pollutants for human health. Under the directive Member States are	IIA objectives should consider the potential effects that the Local Plan will have in terms of air quality.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	required to reduce exposure to PM _{2.5} in urban areas by an average of 20% by 2020 based on 2010 levels.	
Water Framework Directive 2000/60/EC	The Water Framework Directive is primarily concerned with the quality of waters, and commits all member states to achieving 'good status' for all water bodies by defining and implementing the necessary measures within integrated programmes of measures, taking into account existing Community requirements. The Directive promotes the development and application of sustainable urban drainage systems (SuDS) policy.	IIA objectives to reflect the need to improve water quality. The Local Plan should consider issues around the protection of water quality and SuDS.
Waste Framework Directive 2008/98/EC	The Waste Framework Directive provides the legislative framework for the collection, transport, recovery and disposal of waste. It requires all member states to ensure waste is recovered or disposed of without endangering human health or causing harm to the environment. The directive also requires member states to take appropriate measures to encourage firstly, the prevention or reduction of waste and its harmfulness and secondly, the recovery of value from waste by means of recycling, re-use or reclamation or any other process with a view to extracting secondary raw materials	The IIA should consider the issues around waste and recycling and the possibility of utilising waste as a means of power generation. The Local Plan should consider issues around waste and the possibility of utilising waste as a means of power generation. The Local Plan should contain policies that contribute to achieving the waste targets set out in the London Plan.
Urban Waste Water Treatment Directive 91/271/EEC	The objective of the Urban Waste Water Treatment directive is to protect the environment from the adverse effects of urban waste water discharges and discharges from certain industrial sectors (see Annex III of the Directive) and concerns the collection, treatment and discharge of:	The Local Plan and IIA Objectives should take into account the issues around the management of urban waste water.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	• Domestic waste water • Mixture of waste water • Waste water from certain industrial sectors The Directive requires the following actions to be undertaken from all Member states: • The Collection and treatment of waste water in all agglomerations of >2000 population equivalents • Secondary treatment of all discharges from agglomerations of >2000 p.e., and more advanced treatment for agglomerations >10,000 population equivalents in designated sensitive areas and their catchments • A requirement for pre-authorisation of all discharges of urban wastewater, or discharges from the food-processing industry and of industrial discharges into urban wastewater collection systems; • Monitoring the performance of treatment plants and receiving waters; and • Controls of sewage sludge disposal and re-use, and treated waste water re-use whenever it is appropriate.	
Directive on the Promotion of the Use of Energy from Renewable Sources 2009/28/EC	The Promotion of the Use of Energy from Renewable Sources directive establishes an overall policy for the production and promotion of energy from renewable sources in the EU. It requires the EU to fulfil at least 20% of its total energy needs with renewables by 2020. All EU countries must also ensure that there is at least 10% of their transport fuels come from renewable sources by 2020. The Directive specifies national renewable energy targets for each country, taking into consideration the country's starting point and	IIA objectives to reflect the need to promote renewables. The Local Plan will need to consider a policy response to aid in the promotion of renewable energy that will ensure national and international obligations specified within this directive are met.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	overall potential for renewables. The United Kingdom has a target of at least 15% share of energy from renewable sources.	
Health for Growth 2014-2020, European Commission, 2011	Health for Growth is the third EU health programme. It seeks to enable health to better contribute to economic growth and achieving the objectives of Europe 2020. The programme has the following 4 overarching objectives: 1. Promote health, prevent diseases and foster supportive environments for healthy lifestyles taking into account the 'health in all policies' principle 2. Protect Union citizens from serious cross-border health threats 3. Contribute to innovative, efficient and sustainable health systems 4. Facilitate access to better and safer healthcare for Union citizens	IIA to assess the health impacts that the policies and proposals contained within the emerging Local Plan will have on the current and future population of the borough. The Local Plan to consider how its policies and proposals can support innovative solutions to improve healthcare provision. The Local Plan should consider public health.
European Convention on the Protection of the Archaeological Heritage (revised), 1992	The aim of this Convention (also referred to as the Valletta treaty) is to protect the archaeological heritage as a source of the European collective memory and as an instrument for historical and scientific study. The need to protect the archaeological heritage should be reflected in town and country planning and cultural development policies.	IIA objectives to reflect the requirement to protect archaeological heritage. The Local Plan should continue to contribute to the protection of the borough's archaeological heritage.
European Landscape Convention 2000	The European Landscape Convention (also known as the Florence Convention) promotes the protection, management and planning of European landscapes and organises European co-operation on landscape issues.	IIA objectives to reflect the need to promote landscape protection. The Local Plan should consider a policy response to protecting European Landscapes.
National		
Equality Act 2010	Under regulation 149 of the Equality Act 2010, a public authority and those who exercise public functions, in the exercise of its function, to have due regard to the need to • Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this act	The IIA will fulfil the requirements of the Equality Act through the carrying out of an Equality Impact Assessment (EqIA).

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	• Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; • Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.	The Local Plan will play an important role in advancing equality of opportunity and fostering good relations.
Wildlife and Countryside Act 1981	The Wildlife and Countryside Act 1981 consolidates and amends existing national legislation to implement the Convention on the Conservation of European Wildlife and Natural Habitats and Council Directive 79/049/EEC on the conservation of wild birds in Great Britain. The Act makes it an offence to kill, injure or otherwise harm any wild bird, specified animals (listed in Schedule 5) and wild plants. The Act contains measures for preventing the establishment of non-native species which may be detrimental to native wildlife, prohibiting the release of animals and planting of plants listed in Schedule 9 in England and Wales.	The IIA should consider the potential effects the emerging Local Plan will have on the borough's wildlife. The IIA objectives to reflect the need to protect native wildlife. The Local Plan to consider how it can promote naturalisation. The Local Plan to consider the issues around the protection of wildlife.
Flood and Water Management Act 2010	The Flood and Water Management Act provides for better, more comprehensive management of flood risk for people, homes and businesses, helps safeguard community groups from unaffordable rises in surface water drainage charges, and protects water supplies to the consumer. The Act contains the following key actions: • Requirement for the Environment Agency to develop, maintain, apply and monitor a strategy for flood and coastal erosion risk management in England which a number of organisations will have to follow • Requirement for lead local flood authority for an area in England to develop, maintain, apply and monitor a strategy for local flood risk management in its area	IIA objectives to reflect the need to address flooding and water management. The Local Plan should consider the issues around water management within Brent and promote the use of Sustainable Urban Drainage Systems (SuDS) The Local Plan to be informed by a Strategic Flood Risk Assessment, and support the implementation of the flood risk management strategy.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	• Enables the Environment Agency and local authorities to exercise their flood or coastal erosion risk management functions with greater ease than previously • Requirement for a lead local flood authority to ○ establish and maintain a register of structures or features which, in the opinion of the authority, are likely to have a significant effect on a flood risk in its area; and, ○ a record of information about each of those structures or features, including information about ownership and state of repair • Introduces a more risk-based approach to reservoir management • Requirement for a sustainable drainage system (to be approved prior to construction) at certain type of development sites • Introduces a mandatory building standard for sewers	

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
The Children Act 2004	The Children Act places a statutory duty on local authorities to act as the champion for all children and young people in the borough. Each local authority in England must make arrangements to co-operate with relevant partners, with the view to improving the well-being of children in the authority's area so far as relating to: 1. Physical and mental health and emotional well-being 2. Protection for harm and neglect 3. Education, training and recreation 4. The contribution made by them to society 5. Social and economic well-being The Act also places a requirement on a local authority to establish a Children's Trust Board and a Local Safeguarding Children Board for their area. Regulation 17 of the Act states that "<i>The Secretary of State may be regulations require a Children's Trust Board From time to time to prepare and publish a children and young people's plan</i>", which sets out the strategy of the persons or bodies represented on the Board for co-operating with each other with a view of improving the well-being of children and relevant young persons in the area.	IIA objectives to reflect the need to ensure that there is sufficient social infrastructure i.e. schools, social care and community halls, to support the growing population. The Local Plan to ensure that is sufficient social infrastructure to support the proposed developments and the current and future population of the borough. The Local Plan should seek opportunities to improve the environment in which children and young people live, learn, work and play
Education Act 2011	The Education Act places a statutory duty on local authorities to "<i>promote high standards and fulfilment of potential in school so that all children and young people benefits from at least a good education</i>".	IIA objectives to reflect the need to ensure that there is sufficient social infrastructure i.e. schools, social care and community halls, to support the growing population. The Local Plan to ensure that there is sufficient social infrastructure i.e. schools, social care and community

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
		halls, to support the growing population.
Energy Act 2013	The Energy Act establishes a legislative framework for delivering secure, affordable and low carbon energy. The Act includes provisions on decarbonisation, nuclear regulation, government pipeline and storage system, electricity market reform and consumer protection.	The Local Plan and the IIA will take account of the Energy Act where it is relevant IIA objectives to reflect the need to promote low carbon energy.
Climate Change Act 2008	The Climate Change Act sets legally binding targets to ensure that the net UK carbon account for 2050 is at least 80% lower than the 1990 baseline The Act also places a duty on the Secretary of State to - Set for each succeeding period of five years beginning with the period 2008-2012 an amount for the net UK carbon account, and - To ensure that the net UK carbon account for a budgetary period does not exceed the carbon budget	IIA objectives to reflect the need to reduce carbon dioxide emissions. The IIA should consider the potential impacts of the emerging Local Plan in terms of issues around climate change. The Local Plan should consider issues around climate change.
Planning (Listed Building and Conservation Areas) Act 1990	The Planning (Listed Building and Conservation Areas) Act consolidate certain enactments relating to special controls in respect of buildings and areas of special architectural or historic interest. Regulation 66 states that <i>"In considering whether to grant planning for permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses"</i> .	IIA objectives to reflect the desirability of preserving heritage. The IIA should consider the impacts proposed development/policies would have on the borough's heritage assets. The Local Plan should consider issues around the management of the borough's heritage assets.
Ancient Monuments and Archaeological Areas Act 1979	The Ancient Monument and Archaeological Area Act consolidates and amends the law relating to ancient monuments. It makes provision for the investigation, preservation and recording of	The IIA and Local Plan Review will take into account and accord within the provisions set out in the Ancient

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	matters of archaeological or historical interest and for the regulation of operations of activities affecting such matters. Section 61(12) defines sites that warrant protection due to their being of national importance as 'ancient monuments'. The Act also introduced the concept of Areas of Archaeological Importance and city centres of historic significance which receive limited further protection by forcing developers to permit archaeological access prior to building work starting.	Monuments and Archaeological Areas Act.
UK Climate Change Programme 2006	The UK Climate Change Programme sets out the Government's commitments both at international and domestic levels to meet the challenge of climate change. On a domestic level the strategy stated that the following actions would be carried out: • Report annually to Parliament on emissions, future plans and progress on domestic climate change • Set out an adaptation plan for the UK which has been informed by additional research on the impacts of climate change. The strategy identified a number of primary elements which involved working with a number of sectors (energy, business, public sector and local government, transport, agriculture) to improve fuel and energy efficiency.	IIA objectives to reflect the need to meet the challenge of climate change and promote energy efficiency. The Local Plan should consider issues around climate change. The Local Plan should explore measures/methods on how the borough will adapt to the impacts of climate change.
National Planning Policy Framework, Department for Communities and Local Government, February 2019	The National Planning Policy Framework (NPPF) sets out the Government's requirement for the planning policies for England and how these are expected to be applied. As stated in Paragraph 10, "<i>At the heart of the Framework is a presumption in favour of sustainable development. "The Government believes that the planning system has three overarching objectives in order to achieve sustainable development:</i> • An economic objective – to help build a strong, responsive and competitive economy	The IIA objectives to encompass economic, social and environmental sustainability principles outlined in the NPPF The Local Plan must be in conformity with the NPPF and promote sustainable development.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	• A social objective – supporting strong, vibrant and healthy communities; and • An environmental objective – contributing to protecting and enhancing our natural, built and historic environment, including making effective use of land Following on from discussing plan-making and decision-making, the NPPF set out the policies for planning in England, which are broken down into the following 17 sections. 1. Delivering a sufficient supply of homes 2. Building a strong, competitive economy 3. Ensuring the vitality of town centres 4. Promoting healthy and safe communities 5. Promoting sustainable transport 6. Supporting high quality communications 7. Making effective use of the land 8. Achieving well-designed places 9. Protecting green belt land 10. Meeting the challenge of climate change, flooding and coastal change 11. Conserving and enhancing the natural environment 12. Conserving and enhancing the historic environment 13. Facilitating the sustainable use of minerals 14.	
National Planning Policy for Waste, October 2014	The National Planning Policy for Waste sets out detailed waste planning policies. The document provides guidance on how local planning authorities should identify the need for waste management facilities, identify suitable sites and determine waste planning applications	IIA objectives and the Local Plan should seek to promote a sustainable and efficient approach to resource use and management. The Local Plan should consider issues around waste management. Waste management should be considered alongside other spatial concerns.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
Planning Policy for Traveller Sites, Department for Communities and Local Government, August 2015	Planning Policy for Traveller Sites sets out the Government's planning policy for traveller sites. It states that "<i>The Government's overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community</i>". To help achieve the above overarching aim, the Government's aims in respect of traveller sites are: A. That local planning authorities should make their own assessment of need for the purposes of planning B. To ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites C. To encourage local planning authorities to plan for sites over a reasonable timescale D. That plan-making and decision-taking should protect Green Belt from inappropriate development E. To promote more private traveller site provision while recognising that there will always be those travellers who cannot provide their own sites F. That plan-making and decision-taking should aim to reduce the number of unauthorised developments and encampments and make enforcement more effective. G. For local planning authorities to ensure that their Local Plan includes fair, realistic and inclusive policies H. To increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply I. To reduce tensions between settled and traveller communities in plan-making and planning decisions J. To enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure	IIA objectives should seek to ensure fair and equal treatment of travellers, ensuring their needs are addressed. The Local Plan should identify need and seek to address under provision for the travellers' community.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	K. For local planning authorities to have due regard to the protection of local amenity and local environment	
DfE strategy 2015 to 2020: world-class education and care, Department for Education, March 2016	Identifies the Government's vision, system goals, delivery priorities and principles for the UK's education system. The vision is as follows: <i>"Provide world-class education and care that allows every child and young person to reach his or her potential, regardless of background".</i> To achieve the above vision, the strategy sets out the following twelve strategic priorities: 1. Recruit, develop, support and retain teachers 2. Strengthen school and system leadership 3. Drive sustainable school improvement 4. Embed clear and intelligent accountability 5. Embed rigorous standards, curriculum and assessment 6. Ensure access to quality places where they are needed 7. Deliver fair and sustainable funding 8. Reform 16-19 skills 9. Develop early years' strategy 10. Strengthen children's social care 11. Support and protect vulnerable children 12. Build character and resilience	IIA objectives to reflect the need to ensure that there is sufficient social infrastructure i.e. schools, social care and community halls, to support the growing population. The Local Plan should ensure that there is sufficient education provision to support the existing and future population of the borough.
Conservation Principles Policies and Guidance for the Sustainable Management of the Historic Environment, English Heritage (now known as Historic England), April 2008	Sets out the logical approach to making decision and offering guidance about all aspects of England's historic environment. The document sets out the following six conservation principles which are to provide a comprehensive framework for sustainable management of the historic environment: 1. The historic environment is a shared resource 2. Everyone should be able to participate in sustaining the historic environment 3. Understanding the significance of place is vital	IIA objectives to reflect the desirability of preserving heritage. The IIA should consider the impacts proposed development/policies would have on the borough's heritage assets.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	4. Significant [places should be managed to sustain their values 5. Decisions about charges must be reasonable, transparent and consistent 6. Documenting and learning from decisions is essential	The Local Plan should seek to protect and enhance the borough's heritage assets The Local Plan should consider issues around the management of the borough's heritage assets.
International Education Strategy: global potential, global growth, Department for Education, Department for International Trade, March 2019	The strategy sets out the government's objective to drive ambition across the UK education sector, and an ambition to increase education exports to £35 billion by 2030. To achieve this ambition, the strategy states a need to build our global market share in international students across all education sectors. To support the implementation of the strategy, 5 cross cutting actions are proposed that will support the whole education sector. These are: • Appoint an International Education Champion • Ensure Education is GREAT promotes the breadth and diversity of the UK education offer • Continue to provide a welcoming environment for international students and develop an increasingly competitive offer • Establish a whole-of-government approach • Provide a clearer picture of exports activity	IIA objectives to reflect the need to ensure that there is sufficient social infrastructure i.e. schools, social care and community halls, to support the growing population. The Local Plan should ensure that there is sufficient education provision to support the existing and future population of the borough The Local Plan should seek to establish a strong commitment to high quality education which will generate economic, personal and cultural growth.
Clean Air Strategy 2019, Department for Environment, Food and Rural Affairs, 2019 (supersedes the 2011 Air Quality Strategy)	The updated Strategy sets out actions that will be required from across all parts of government and society that will help tackle all sources of air pollution. It provides a long-term vision for improving air quality in the UK and outlines actions to protect the nation's health and protect the environment through the following:	IIA should promote improving air quality within the borough, particularly within AQMA and Air Quality Focus areas

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	• Securing clean growth and driving innovation • Action to reduce emissions from transport • Action to reduce emissions at home • Action to reduce emissions from farming • Action to reduce emissions from industry • Leadership at all levels. The aim of the updated Strategy is: <i>“This Clean Air Strategy shows how we will tackle all sources of air pollution, making our air healthier to breathe, protecting nature and boosting the economy”.</i> The strategy states that a new, ambitious, long-term target to reduce people’s exposure to particulate matter pollution to PM_{2.5}.	The IIA will consider the possible impact the emerging Local Plan will have on air quality within the borough. The emerging Local Plan and IIA will take account of the UK Air Quality Strategy. The emerging Local Plan will seek to ensure there is improvement in the air quality within the borough
The UK Government Sustainable Development Strategy, HM Government, 2005	The strategy set out the following guiding principles which will be used to achieve the sustainable development purpose and will form the basis for policy in the UK: • Living within environmental limits • Ensuring a strong, healthy and just society • Achieving a sustainable economy • Promoting good governance • Using sound science responsibly The shared priority areas for immediate action identified within the strategy are: • Sustainable consumption and production • Climate change and energy • Natural resource protection and environmental enhancement • Sustainable communities	The Local Plan and the IIA objectives should reflect the vision and objectives of the strategy and promote sustainable development.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
The UK Low Carbon Transition Plan, HM Government, July 2009	Sets out the Government's plan to deliver emission cuts of 18% on 2008 levels by 2020. Key steps include: • getting 40% of electricity from low carbon sources by 2020 • making homes greener • helping the most vulnerable, through a community based approach to delivering green homes • promoting green industry; • tackling emissions from farming; and • cutting carbon dioxide emissions from transport	IIA objectives to reflect the need to reduce carbon dioxide emissions. IIA objectives to reflect the need to promote low carbon energy. The Local Plan should seek to reduce carbon emissions, promote the greening of houses and the use of renewable energy.
The Carbon Plan, HM Government, December 2011	The Plan sets out how the UK will make the transition to a low carbon economy to help cut emissions by 80% by 2050, while maintaining energy security. The Plan focuses around the topics of: • Low Carbon Buildings – by 2050, all buildings will need to have an emissions footprint close to zero. Buildings will need to become better insulation, use more energy-efficient products and obtain their heating from low carbon sources. • Low Carbon Transport – by 2050, domestic transport will need to be substantially reduce its emissions • Low Carbon Industry - By 2050, the Government expects industry to have delivered its fair share of emissions cuts, achieving reductions of up to 70% from 2009 levels. • Low Carbon Electricity – by 2050, emissions from the power sector need to be close to zero • Agriculture, land use, forestry and waste - Government is encouraging practical actions which lead to efficiencies such as improved crop nutrient management and better breeding and feeding practices, which save both money and emissions.	IIA objectives should be reflective of the move to the low carbon future. The Local Plan take account of and be in line with The Carbon Plan.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
UK Renewable Energy Strategy, HM Government, 2009	The strategy sets out the path for the UK to meet legally-binding target to ensure 15% of our energy comes from renewable sources by 2020. The Strategy also states that it will help to “<i>tackle climate change, reducing UK’s emissions of carbon dioxide by over 750 million tonnes between now and 2030. It will also promote the security of our energy supply, reducing our overall fossil fuel demand by around 10% and gas imports by 20-30% against what they would have been in 2020</i>”.	Issues around renewable energy will be considered in the IIA. The Local Plan and the IIA will take account of, and be in line with the UK Renewable Energy Strategy. The Local Plan to promote the use of renewable energy to help contribute to meeting legally-binding targets.
Future Water: The Government’s Water Strategy for England, Department for Environment, Food and Rural Affairs, June 2011	Future Water sets out how the government wants the water sector to look by 2030, and identified some of the steps that need to be undertaken to get there The Government’s vision for water policy and management is one where, by 2030 at the latest, we have: • Improved the quality of our water environment and the ecology which it supports, and continued to provide high levels of drinking water from our taps; • Sustainably managed risks from flooding and coastal erosion, with greater understanding and more effective management of surface water; • Ensured a sustainable use of water resources, and implement fair, affordable and cost-reflective water charges; • Embedded continuous adaptation to climate change and other pressures across the water industry and water users. As part of the above vision, the Government would like to achieve the following objectives: • Reduced per capita consumption of water through cost effective measures, to an average of 130 litres per person per day by 2030, or possibly even 120 litres per person per day • Amending the Building Regulations to include a requirement for a minimum standard of water efficiency in new homes	The IIA should consider the potential effects of the emerging Local Plan around water management. The IIA objectives should reflect the need for sustainable water use and the need to manage flood risk. The Local Plan should consider the issues around water management and flood risk within Brent and promote the use of Sustainable Urban Drainage Systems (SuDS) The Local Plan should seek to improve the chemical and ecological status of water bodies within Brent.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	• Development of a National Policy Statement for water supply and wastewater treatment infrastructure • Large majority of water bodies in England having good ecological and chemical status	
UK Post-2010 Biodiversity Framework, Joint Nature Conservation Committee and Department for Environment, Food and Rural Affairs, 2012	The purpose of the UK Biodiversity Framework is to set a broad enabling structure for action across the UK between 2011 and 2020. The Framework sets out the following vision: <i>“By 2050, biodiversity is valued, conserved, restored and wisely used, maintain ecosystem services, sustaining a healthy planet and delivering benefits essential for all people”.</i> The Framework is based on the following five strategic goals: • Address the underlying causes of biodiversity loss by mainstreaming biodiversity across government and society • Reduce the direct pressures on biodiversity and promote sustainable use • To improve the status of biodiversity by safeguarding ecosystems, species and genetic diversity • Enhance the benefits to all from biodiversity and ecosystems • Enhance implementation through participatory planning, knowledge management and capacity building. The document identifies 23 areas of work which will contribute to the four UK countries achieving the ‘Aichi Biodiversity Targets’ and the aims of the EU biodiversity strategy.	IIA objective to reflect the need to value, conserve and restore ecosystem services within the borough. The IIA should assess the potential impacts policies and proposals contained within the emerging Plan could have on the borough’s biodiversity. The Local Plan should promote biological diversity and seek to avoid any detrimental impact on species and habitats.
Safeguarding our soils: A Strategy for England, Department for Environment Food and Rural Affairs, 2009	The Strategy sets out the following vision: <i>By 2030, all England’s soils will be managed sustainably and degradation threats tackled successfully. This will improve the quality of England’s soils and safeguard their ability to provide essential services for future generations.</i>	IIA objectives to reflect the need to protect the quality of soils and safeguard their ability to provide essential services for future generations.

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	The Strategy introduced a number of key new actions, which includes: • A commitment to developing a new framework for action for peat protection, including on horticultural peat use post 2010 • Reviewing thresholds for pollutants entering soil through recycling materials to land • Publishing a new code for practice for soil use on construction sites and a new toolkit for planners in 2010 on how to take account of soil functions through the planning system	The Local Plan to reflect the objectives of this strategy.
White Paper: Healthy Lives, Healthy People: our strategy for Public Health in England, Department for Health, June 2011	This White Paper outlines the Government's commitment to protecting the population from serious health threats; helping people live longer healthier and more fulfilling lives; and improving the health of the poorest, fastest. The Paper responds to Professor Sir Michael Marmot's <i>Fair Society, Healthy Lives</i> report and adopts its life course framework for tackling the wider social determinants of health. The approach will aim to build people's self-esteem, confidence and resilience right from infancy – with stronger support for early years. The Paper identifies that the current approach is not up to the task of seizing the number of opportunities identified and sets out a new approach that will reach across and reach out – addressing the root causes of poor health and wellbeing, reaching out to the individuals and families who need the most support. The new approach will be: • Responsive – owned by communities and shaped by their needs • Resourced - with ring-fenced funding and incentives to improve • Rigorous – professionally-led, focused on evidence, efficient and effective; and	IIA objective to reflect the need to address the cause of poor health and wellbeing. The IIA will assess the health impacts that the policies and proposals contained within the emerging Local Plan will have on the current and future population of the borough. The Local Plan to consider how its policies and proposals can support innovative solutions to improve healthcare provision. The Local Plan should consider public health.

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	• Resilient – strengthening protection against current and future threats to health The White Paper highlights local innovation and outlines the cross-government framework that will enable local communities to reduce inequalities and improve health at key stages in people's lives. This includes: • The requirement for upper-tier councils and unitary authorities to lead local hire Directors of Public Health to lead local public health efforts; • Clarifying the role of local authorities and the Director of Public Health in health improvement, health protection and population healthcare; • Identifying the mandatory services that local authorities are required to provide; and • Establishing Public Health England as an Executive Agency to provide greater operational independence within a structure that is accountable to the Secretary of State for Health.	
UK plan for tackling roadside nitrogen dioxide concentrations – an overview, Department for Environment Food and Rural Affairs, Department for Transport, July 2017	Recognises the leadership role that the Government has to take to help Local Authorities tackle the causes of air pollution, particularly nitrogen dioxide. The document sets out the following actions that the Government will take: • Setting up a £255m Implementation Fund • Establishing a Clean Air Fund • £100 million for retrofitting and new low emission buses Sets out the requirement for relevant local authorities to produce initial plans by the end of March 2018, to be followed by final plans by the end of December 2018.	IIA objective to reflect the need to improve air quality The IIA will consider the possible impact the emerging Local Plan will have on air quality within the borough. The Local Plan will seek to ensure there is improvement in the air quality within the borough The Local Plan and IIA will take into account the Government's ambition to

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	The document also stated that the <i>“Government will assess local plans to ensure they are effective, fair, good value, and deliver the necessary air quality compliance”</i>.	reduce nitrogen dioxide concentrations.
Noise Policy Statement for England, Department for Environment, Food and Rural Affairs, March 2010	The aim of the Policy Statement is to provide clarity regarding current policies and practices to enable noise management decisions to be made within the wider context, at the most appropriate level, in a cost-effective manner and in a timely fashion. The Policy Statement sets out the following long-term vision of Government noise policy: <i>“Promote good health and a good quality of life through the effective management of noise within the context of Government policy on sustainable development”</i>. This long-term vision is supported by the following aims: <i>“Through the effective management and control of environmental, neighbour and neighbourhood noise within the context of Government policy on sustainable development:</i> • <i>Avoid significant adverse impacts on health and quality of life;</i> • <i>Mitigate and minimise adverse impacts on health and quality of life; and</i> • <i>Where possible, contribute to the improvement of health and quality of life.</i>	IIA objectives to reflect the need to mitigate and minimise adverse impacts on health from noise. The Local Plan to contribute to the aims of the policy statement, by taking forward relevant priorities identified in the borough Noise Action Plan.
Secured by Design 2019 (supersedes Secured by Design 2016)	Secure by Design is a police initiative to guide and encourage those engaged within the specification, design and build of new homes, and those undertaking major and minor property refurbishment, to adopt crime prevention measures. The 2019 edition incorporates the latest security standards, developed to address emerging criminal methods of attack, and includes references to the Building Regulations and other statutory requirements across the UK. It has been designed to cater for the	IIA and the Local Plan to reflect the need to reduce and/or prevent crime. The Local Plan should promote the Secure by Design principles

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	security of all new and refurbished homes, including those for older and disabled people. The document provides guidance on proven crime reduction methodologies for the external environment, with the requirements and recommendations within the guide being based upon sound research findings that have been proven to deliver crime reduction and cost efficiency savings..	
Environmental Protection Act 1990	This Act makes provision for the improved control of pollution arising from certain industrial and other processes. It brings in a system of integrated pollution control for the disposal of waste to land, water and air. The Act gives Local Authorities new powers to control air pollution from a range of prescribed processes.	IIA and the Local Plan to be in accordance with the Environmental Protection Act
Policy statement: Planning for schools development, Department for Communities and Local Government, August 2011 (supersedes the Statement of 26 th July 2010)	The Policy Statements sets out the Government's commitment to support the development of state-funded schools and their delivery through the planning system. The Statement sets out the there is a presumption in favor of the development of state-funded schools, as expressed in the National Planning Policy Framework, and therefore the planning system should operate in a positive manner when dealing with proposals for the creation, expansion and alteration of these schools.	IIA objectives to reflect the need to ensure that there is sufficient social infrastructure i.e. schools, social care and community halls, to support the growing population. The Local Plan should ensure that there is sufficient education provision to support the existing and future population of the borough.
Written Ministerial Statement: Sustainable Drainage Systems, December 2014	The Statement makes clear the Government's expectations that sustainable drainage systems are to be provided within new developments wherever it is appropriate. The Statement introduced a requirement from the 6th April 2015 for local planning policies and decision on planning applications relating to major development to ensure that sustainable drainage systems for the management of run-off are put in place, unless demonstrated to be inappropriate.	IIA objective to reflect the need for sustainable drainage. The Local Plan to promote the use of SuDS on development sites (where appropriate) Local Plan policy to be reflective of the requirement introduced through the ministerial statement.

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Housing White Paper; fixing our Broken Housing Market, Department for Communities and Local Government, February 2017	The housing white paper sets out the Government's strategy to build the homes the country needs. It identifies the support the Government will provide to enhance the capacity of local authorities and industry to build new homes, and the role that professions and institutions should play to make the identified proposals a reality. The proposals and actions identified within this White paper focus on the following areas: • Planning for the right homes in the right places • Building homes faster • Diversifying the market • Helping people now	IIA objective to reflect the need to secure housing to meet identified need, particularly affordable housing. The Local Plan will directly contribute to the aspirations of the White Paper, by setting out an up to date plan which seeks to boost housing supply. Through site allocations, the emerging Local Plan will seek to ensure that there is an adequate supply of affordable housing being provided within the borough.
Regional		
The draft new London Plan, GLA, 2017 (2018 – Minor Amendments) (2019 - Intend to Publish)	The draft London Plan provides the framework to address key planning issues facing London. The Plan covers the following policy areas / chapters: 1. Planning London's Future – Good Growth 2. Spatial Development Patterns 3. Design 4. Housing 5. Social Infrastructure 6. Economy 7. Heritage and Culture 8. Green Infrastructure and Natural Environment 9. Sustainable Infrastructure 10. Transport Chapter 11 focuses on delivery of the plan and planning obligations, and chapter 12 focuses on monitoring of the plan.	IIA objectives to reflect and building upon the key policy areas identified within the new London Plan. The Local Plan must be in conformity with the London Plan.

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	Each of the above policy areas in the Plan is informed by the following six Good Growth policies: • Policy GG1: Building strong and inclusive communities • Policy GG2: Making the best use of land • Policy GG3: Creating a healthy city • Policy GG4: Delivering the homes Londoners needs • Policy GG5: Growing a good economy • Policy GG6: Increasing efficiency and resilience Chapter two sets out the overall spatial development pattern for London, and focuses on the growth strategies for specific places in London and how they connect to the wider South East. There are a number of Key Performance Indicators identified within the draft new Plan, which include: • Increasing mode share for walking, cycling and public transport (excluding taxis) towards the target of 80% by 2041; • A positive trend in percentage of planning approvals for housing that are affordable housing (based on a rolling average) • Average on site carbon emission reductions of at least 35% compared to Building Regulations 2013 for approved and referable development applications; and • Increase in the supply of new homes towards meeting the 66,000 net additional homes needed per year up to March 2029	
The London Plan, GLA, 2016	The London Plan sets out an integrated social, economic and environmental framework for the future development of London and deals with planning issues of strategic importance. The London Plan sets out the following vision	IIA objectives should reflect and build upon the London Plan's strategic themes and objectives. The Local Plan must be in conformity with the London Plan.

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	<i>“Over the years to 2036 – and beyond, London should: Excel among global cities – expanding opportunities for all its people and enterprises, achieving the highest environmental standards and quality of life and leading the world in its approach to tackling the urban challenges of the 21st century, particularly that of climate change.”</i> To achieve the over-arching vision for London, the Plan is supported by the following six objectives: 1. A city that meets the challenges of economic and population in ways that ensure a sustainable, good and improving quality of life and sufficient high quality homes and neighbourhoods for all Londoners, and help tackle the huge issue of deprivation and inequality among Londoners, including inequality in health outcomes; and 2. An internationally competitive and successful city with a strong and diverse with a strong and diverse economy and an entrepreneurial spirit that benefit all Londoners and all parts of London; a city that is at the leading edge of innovation and research, and which is comfortable with – and makes the most of – its rich heritage and cultural resources. 3. A city of diverse, strong, secure and accessible neighbourhoods to which Londoners feel attached, which provide all of its residents, workers, visitors and students – whatever their origin, background, age or status – with opportunities to realise and express their potential and a high quality environment for individuals to enjoy, live together and thrive. 4. A city that delights the senses and takes care over its buildings and streets, having the best of modern architecture while also making the most of London’s built heritage, and which makes the most of and extends its wealth of open and green spaces, natural environments and waterways,	

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	realising their potential for improving Londoners' health, welfare and development. 5. A city that becomes a world leader in improving the environment locally and globally, taking the lead in tackling climate change, reducing pollution, developing a low carbon economy, consuming fewer resources and using them more effectively. 6. A city where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities with an efficient and effective transport system which actively encourages more walking and cycling, makes better use of the Thames and supports delivery of all the objectives of this Plan The Policies of the London Plan are split into the following chapters: • Context and Strategy • London's Places • London's People • London's Economy • London's Response to Climate Change • London's Transport • London's Living Spaces and Places • Implementation, Monitoring and Review	
A City for All Londoners, GLA, October 2016	The document sets the tone for the strategies and the direction of travel for the current Mayor's Mayoralty. The Mayor's key policy areas are as follows: 1. Accommodating growth – intensify housing development whilst protecting employment land, intensifying development around town centres. 2. Housing – promote delivery on public sector land, and secure a variety of affordable housing types.	The IIA and Local Plan should take account of this proposed direction of travel and build on these strategic priorities.

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	3. Economy – continue to promote London as the top business city. 4. Environment, transport and public spaces – improve air quality and for London to be zero carbon by 2050. 5. A city for all Londoners – addressing inequalities, tackling disadvantage and discrimination.	
Mayor's Transport Strategy, GLA, 2018	The Mayor's Transport Strategy, which was adopted in 2018, supports the healthy streets approach which seeks to create streets and street networks that encourage walking, cycling and public transport use. It also seeks to reduce the number of vehicles on London's street through creating a good public transport experience and plans for growth, both housing and economic, around the transport network.	IIA objectives should reflect the priorities of the Transport Strategy and translate them, as appropriate to local level.
Culture and the night-time economy SPG, GLA, November 2017	The SPG provides guidance on how to promote the evening and cultural economy through: • Protecting public houses • Sustaining existing venues and providing new facilities • Promoting a wider range of evening and night time activities • Transport • Safety and Security • Environmental Services • Designing developments that provide access to all • Agents of change i.e. development should not unduly add to the cost and burdens of existing businesses# • Central Activities Zones • Promote strategic cultural areas and cultural quarters	IIA objectives should seek to protect and promote the borough's cultural offer and evening economy. The Local Plan should consider if new cultural quarters could be identified. The emerging Local Plan should seek to protect and enhance the borough's evening and cultural economy.
Homes for Londoners – Affordable Housing and Viability SPG, GLA, August 2017	The SPG's main aim is to increase the number of affordable homes delivered through the planning system and will provide a consistent approach across London. The SPG sets out the Mayor's preferred approach to implement London Plan Policies 3.11, 3.12 and 3.13.	IIA objectives should seek to increase affordability output. The Local Plan should use this SPG as a key reference in defining Local

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	The SPG also sets out the ‘threshold approach’ to viability, which is where the approach to viability information differs depending on the level of affordable housing being provided. The threshold hold approach consists of the following: • Fast Track Route - applications that meet or exceed 35% affordable housing provision without public subsidy and meet other planning requirements and obligations to the satisfaction of the LPA and the Mayor where relevant, are not required to submit viability information. • Viability Tested Route – schemes which do not meet the 35% affordable housing threshold, or require public subsidy to do so will be required to submit detailed viability information which will be scrutinised by the Local Planning Authority, and where relevant the Mayor, and treated transparently. The SPG also provides specific guidance on Build to Rent developments.	Plan affordable housing policy/principles and mix. Through site allocations, the Local Plan will seek to ensure that is an adequate supply of affordable housing being provided within the borough.
London 2036: An Agenda for Jobs and Growth, LEP & London First, 2015	The report aims to identify the agenda on which London’s stakeholders should focus in order to maximise job creation and economic growth to 2036. The report states that the agenda is designed to deliver a London economy with: • Job growth that translates into opportunity • Diversity and resilience • Documents identifies priorities for actions. It lists a number of priority actions which would help to achieve the agenda identified above. These actions identified within the document fall under the following themes: • Cementing existing leadership: The Global Hub • Fuelling more diverse growth: The Creative Engine • Addressing weaknesses: The City that Works	The IIA should assess the impact that the policies/proposals within the Local Plan will have on Brent’s economy The Local Plan should seek to maximise job creation and economic growth

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The Mayor's draft Economic Development Strategy for London, GLA, December 2017	The strategy sets out the Mayor's vision to create a fairer, more inclusive economy, that works for all Londoners. It also sets out the following ambitions for London's economy in 2041: 1. Londoners are living healthier and happier lives 2. Living standards are improving with real incomes growing year-on-year 3. London has a fairer and more inclusive economy 4. London is a more affordable city to live and work 5. Londoners who want to work and are able to, have access to quality employment and training opportunities 6. London has the most skilled and talented workforce in the world 7. London is a global leader in innovation and creativity 8. London remains the world capital for business, trade and investment 9. London is the best city in which to start and grow a business 10. More people are walking, cycling and using public transport to travel, helping London to grow sustainably 11. London is cleaner, greener, and ready for the future 12. London plays a leading role in the global transition to a low carbon circular economy 13. London has higher productivity relative to other global cities 14. London continues to contribute to the UK economy so that London and the UK grow together. The Strategy outlines a number of actions which the mayor will undertake to achieve his vision.	The IIA should assess the impact that the policies/proposals within the Local Plan will have on Brent's economy The IIA objectives should reflect the objectives of the Mayor's draft Economic Strategy. The emerging Local Plan should ensure that the economic growth is catered for in Brent.
Assessing Future Potential Demand for Older Persons Housing, Care Homes and Dementia Housing in London, Three Dragons (on	This document provides an overview of the current housing situation for older person housing, care homes and dementia housing. It also identified the potential demand for this type of housing in the within the city.	IIA objectives to reflect the need to provide sufficient housing which meets the identified need of the population.

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behalf of GLA), November 2017	Figure 3.3 of the report identified an annual benchmark for Brent for specialist order persons housing between 2017 to 2029 is 230 dwellings per annum.	The Local Plan to ensure that sufficient housing is supplied to meet the identified needs.
The 2017 London Strategic Housing Market Assessment (Part of the London Plan Evidence Base), GLA, November 2017	This document sets out estimates of London's current and future housing requirements. This information will inform the development of the Mayor's London Plan and London Housing Strategy. The document estimates the need for homes within London by tenure and type, as well as analysing the housing requirements of important sub-groups of the population.	IIA objectives to reflect the need to provide sufficient housing which meets the identified need of the population. The Local Plan to ensure that sufficient housing is supplied to meet the identified needs
The 2017 London Strategic Housing Land Availability Assessment (SHLAA) (Part of the London Plan Evidence Base), GLA, November 2017	The document shows that London has a capacity for 649,350 homes during the ten-year period covered by the London Plan housing targets (from 201/20-2028/29). This equates to an average annualised capacity of 64,935 homes a year. Table 1.1 of the SHLAA sets out the total 10-year capacity for each London borough. In regards to Brent, the SHLAA states that the Brent ha a total capacity of 29,150, which equates to an annual target of 2,915. Table 1.2 of the SHLAA sets out the housing capacity on small sites during the ten-year period 2019/20-2028-29. In regards to Brent, the 10 year small sites target is 10,230, which equates to an annual small sites capacity of 1023.	IIA objectives to reflect the need to provide sufficient housing which meets the identified need of the population. The Local Plan to ensure that sufficient housing is supplied to meet the identified needs. The Local Plan to take into consideration the housing targets set out in the SHLAA.
Student Population Projections and Accommodation Need for new London Plan 2017, GLA	This paper presents the projections and estimations for the amount for the student population within London. It explains the rational for estimating how many of these students need to be accommodated in purpose-built student accommodation. The paper found that the is a net need for approximately 88,500 additional purpose-build student accommodation bed spaces between 2016 and 2041, or 3,500 when annualised over a 25-year period.	IIA objectives to reflect the need to provide sufficient housing which meets the identified need of the population The emerging Local Plan to take into consideration the findings of this paper.

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Housing SPG, GLA, updated August 2017	The SPG provides guidance on the implementation of housing policies in the 2015 London Plan and the 2016 Minor Alterations to the Plan MALP). The SPG is divided into 7 parts, which cover the following subjects: • Part 1 – Housing Supply – provides guidance on achieving and exceeding minimum housing targets and advises on potential sources of additional housing capacity • Part 2 – Housing Quality – updates the London housing standards to reflect the implementation of the Government's new national technical standards • Part 3 – Housing Choice – provides guidance on undertaking sub-regional and local housing need assessments. The information on Build to Rent developments within this part has been superseded by the 2017 Affordable Housing SPG • Part 4 – Viability Appraisals - the information within this part has been superseded by the 2017 Affordable Housing SPG • Part 5 – Investment and existing Housing Stock – provides advice on bringing empty homes back into use and the net loss of housing through redevelopment. • Part 6 – Social Infrastructure – focuses on the enabling role of housing in facilitating new infrastructure provision through mixed use development. • Part 7 – Mixed Use and Large Developments - provides guidance on residential and mixed use development in town centres, opportunity areas, large sites and housing zones.	IIA objectives should seek to increase affordability and family housing output, and reflect emphasis on quality of design and housing mix. The Local Plan should use this SPG as a key reference in creating policy for housing i.e. housing quality, housing conversions, housing stock The Local Plan should seek to provide enough dwellings to meet the borough's objectively assessed need. The Local Plan should seek to ensure that there is sufficient social infrastructure to support the increase in the number of dwellings.
Social Infrastructure SPG, GLA, May 2015	The SPG contains guidance on the implementation of London Plan Policies 3.16, 3.17, 3.18 and 3.19. The SPG has a particular focus on those elements of social infrastructure that face the biggest strategic challenges – specifically health, education, sport faith and burials.	IIA objectives should seek to ensure the Local Plan meets the need for social infrastructure. The Local Plan should set out how the social infrastructure needs of the

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	The SPG also includes a methodology to identify future needs and requirements and delivery mechanism.	current and future population of the borough will be met.
London Infrastructure Plan 2050 update, March 2015	The London Infrastructure Plan 2050 provides an overview of London's infrastructure requirements and sets out a programme of infrastructure delivery that is believed to be necessary for London's future. The Plan identifies the city's infrastructure need around the following themes: transport, green infrastructure, digital connectivity, energy, a circular economy, and water, housing and social infrastructure.	IIA objectives should reflect the need to secure infrastructure to support growth. This will be integral to many objectives contained within the IIA. The Local Plan to take into account the London Infrastructure Plan 2050 when identifying the borough's infrastructure needs for the next 20 years.
Accessible London; Achieving an Inclusive Environment, GLA, October 2014	The SPG provides guidance on implementing inclusive design principles effectively and on creating an accessible environment in London, with particular emphasis on the access requirements of disabled and older people. Provides detailed guidance on implementing inclusive design principles and creating an accessible environment.	IIA objectives should reflect the need to promote inclusivity and access for all. The Local Plan should contain policies which encourages inclusive design.
Town Centres SPG, GLA, July 2014	The SPG contains guidance on the Implementation of London Plan Policy 2.15 and Policy 2.16. The SPG acknowledges that town centres will face many challenges, but states that "<i>Planning has a key role to play in promoting vibrant and viable centres and helping them to be flexible, resilient and adaptable to change.</i>" To assist in promoting successful and vibrant town centres, the SPG advances the following principles: • Supporting the evolution and diversification of town centres • Delivering mixed use housing intensification • Quality matters • Promoting accessibility and connectivity • Town centre and regeneration initiatives • Proactive town centre strategies	IIA objectives should reflect the Mayors guidance on Town centres. The Local Plan should consider guidance on Town centres in connection with London Plan policy 2.15. The Local Plan should seek to protect and enhance the viability of the borough's town centres.

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Sustainable Design & Construction SPG, GLA, April 2014	The SPG is intended to: • Provide detail on how to implement the sustainable design and construction and wider environmental sustainability policies in the London Plan • Provide guidance on how to develop more detailed local policies on sustainable design and construction • Provide best practice guidance on how to meet sustainability targets set out in the London Plan; and • Provide examples of how to implement sustainability measures within developments The SPG includes guidance on the following subjects: energy efficient design; meeting the carbon dioxide reduction targets; decentralised energy; how to off-set carbon dioxide where the targets set out in the London Plan are not met; retro-fitting measures; support for monitoring energy use during occupation; an introduction to resilience and demand side response; air quality neutral; resilience to flooding; urban greening; pollution control; basement developments and local food growing.	IIA objectives should seek to promote sustainable design and construction. The Local Plan should incorporate the principles set out the Sustainable Design and Construction SPG.
Healthy Streets for London – Prioritising walking, cycling and public transport to create a healthy city, GLA, February 2017	The Healthy Streets Approach is a system of policies and strategies to help Londoners use cars less and walk, cycle and use public transport more. The aim of the Healthy Streets Approach is to help create a vibrant, successful city where people can live active, healthy lives. The deliver the Healthy Streets Approach changes are required at the following levels of policy making and delivery: 1. Street Level 2. Network level: planning and managing London's transport networks 3. Strategic level: policy and planning The Healthy Streets Approach uses 10 evidence-based indicators, which when achieved will help to create a healthier city in which all people are included and can live well, and where inequalities are reduced.	The IIA will consider the impact that policies/proposals will have with regard to sustainable transport IIA objectives to reflect the need to promote sustainable modes of transport. The Local Plan will include policies which promote sustainable modes of transport.

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Culture for all Londoners – the Mayor of London’s Culture Strategy, GLA, December 2018	Culture for all Londoners: The Mayor of London’s Culture Strategy outlines an ambitious programme to sustain a city that works hard, and plays hard, for everyone – a city that is built on the principle of culture for all Londoners. The strategy outlines four priorities: • Love London – more people experiencing and creating culture on their doorstep • Culture and Good Growth – supporting, saving and sustaining cultural places and spaces • Creative Londoners – investing in a diverse creative workforce for the future • World City – a global creative powerhouse today and in the future The strategy outlines how the Mayor’s vision will be achieved through a number of policies and actions.	IIA objectives to reflect the need to promote access to culture, and protect cultural facilities. The Local Plan should contain policies which promotes the arts, culture and creative industries. The Local Plan should seek to protect and enhance the borough’s cultural facilities.
The Control of Dust and Emissions during Construction and Demolition SPG, GLA, July 2014	This SPG: • Provides more detailed guidance on the implementation of all relevant policies in the London Plan and the Mayor’s Air Quality Strategy to neighborhoods, boroughs, developers, architects, consultants and any other parties involved in any aspect of the demolition and construction process; • Sets out the methodology for assessing the air quality impacts of construction and demolition in London; and • Identifies good practice for mitigating and managing air quality impacts that is relevant and achievable, with the overarching aim of protecting public health and the environment. The SPG contains guidance on the following areas:	IIA objectives to reflect the need to improve air quality, with a focus on what is emitted during the construction phase of a development. The Local Plan should include policies which promote sustainable construction methods, which limit dust and emissions.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	• Preparation of an Air Quality Statement for construction and demolition activities, including air quality (dust) risk assessments • The stages of development the Air Quality Statement is to cover: demolition, earthwork, construction and 'trackout' (vehicles leaving the site) • Identifying the potential scale (large, medium, small) of dust emissions for each stage of work • Identifying the level of risk due to the scale of dust emissions on health, 'soiling' (dirt) and the natural environment • Best practice methods for controlling dust on-site and to prevent 'trackout' • Recommendations for monitoring • Early notification of new 2015 and 2020 standards for non-road mobile machinery	
Land for Industry and Transport SPG, GLA, September 2012	This SPG provides guidance on the implementation of London Plan (2011) Policies 2.1, 4.4 and 6.2. The guidance provided within this SPG is to: • Ensure an adequate stock of industrial capacity to meet the future needs and functional requirements of different types of industrial and related uses in different parts of London, including that for good quality and affordable space; • Plan, monitor and manage the release of surplus industrial land so that it can better contribute to strategic and local planning objectives, especially those to provide more housing and, in appropriate locations, to provide social infrastructure and to contribute to town centre renewal; • Ensure the provision of sufficient land, suitably located, for the development of an expanded transport system to serve London's need.	IIA objectives should consider the need for employment and industrial uses in Brent. The Local Plan should use this SPG as a key referencing point when addressing issues around industrial capacity. The Local Plan should seek to protect and enhance employment and industrial land within the borough to ensure employment needs are met. The Local Plan will need to address issues (i.e. contamination) raised

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		around bringing industrial land into use for other purposes.
London Office Policy Review, GLA, 2017	This review builds on the evidence base of the London Office Policy Review 2012. It states that the London office market has changed significantly since the previous 2012 review, and considers a range of new factors, ranging from Brexit to new forms of occupation. Key points of note from this review include: • Since the referendum, there has been a great deal of uncertainty over the nature of the UK's withdrawal from the EU, with the long-term outlook for London's office market resting largely on the terms under which the UK leave the EU • The role of the office is evolving into one for enabling workers to interact and collaborate – as such, London must continue to plan new capacity but the London Plan will need flexibility to respond to the shifting profile of demand (e.g. agile working) • Smaller occupiers are a critical component of demand for office space, and their numbers suggest that they will have growing impact on the medium to long term profile of demand for office space • Office to residential conversions: the impact of this has not been uniform. While it may have helped clear poor quality office stock, once employment land is lost, it virtually never returns to its employment use – it is, to all practical purposes, a permanent loss of capacity. •	IIA objectives should consider these findings of the London Office Policy Review. The Local Plan should consider these findings and the implications it may have in identifying priority uses for sites within the borough. .
Play and Informal Recreation SPG, GLA, September 2012	This SPG provides guidance on the implementation of London Plan policy 3.6 but also a range of policies on shaping neighbourhoods. The guidance is directed at local authority planners, developers, community groups and a range of consultation who all have roles in ensuring the implementation of the objectives set out in the Guidance.	IIA objectives should seek to protect and increase play and informal recreation opportunities within the borough.

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	The SPG provides benchmark standards that are flexible enough to meet the varying needs of children and young people across London and should be used as a reference to guide boroughs in the development of their own local standards. The guidance sets out the responsibility for local authorities which is: • To ensure robust play strategies and establishing the overall context for implementation of the Supplementary Planning Guidance; and • Having a detailed role in determining requirements for specific sites. The SPG also provides guidance for neighbourhood forums and local communities in shaping their neighbourhood plans.	The Local Plan should seek to ensure there is sufficient supply of play and informal recreation spaces to support the current, and future, population of the borough. The Local Plan should seek to create a framework in which robust play strategies can be established.
All London Green Grid, GLA, March 2012 All London Green Grid SPG, March 2012 ALGG Area Frameworks	The All London Green Grid (ALGG) is a policy framework to promote the design and delivery of 'green infrastructure' across London. The policy framework comprises London Plan policies on green infrastructure and urban greening – and those relating to open spaces, biodiversity, trees and woodland, and river corridors, plus the All London Green Grid Supplementary Planning Guidance and 11 ALGG Area Frameworks The vision for the ALGG is: <i>To create a well-designed green infrastructure network of interlinked, multi-purpose open and green spaces with good connections to the places where people live and work, public transport, the Green Belt and the Blue Ribbon Network, especially the Thames. This will provide a richly varied landscape that will benefit both people and wildlife providing diverse uses to appeal to, and be accessible by, all.</i>	IIA objectives should reflect the need to promote green infrastructure within the borough. The Local Plan should contain policies which seeks to improve and enhance the borough's green infrastructure. The Local Plan should contain policies encouraging urban greening. The Local Plan policies should seek to protect the established strategically important view corridors. Where appropriate, the Local Plan should include references to the objectives and/or schemes identified

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	The aims of the ALGG are as follows: • To protect and enhance London's strategic network of green and open natural and cultural spaces, to connect the everyday life of the city to a range of experiences and landscapes, town centres, public transport nodes, the countryside in the urban fringe, the Thames and major employment and residential areas • To encourage greater use of, and engagement with, London's green infrastructure; popularising key destinations within the network and fostering a greater appreciation of London's natural and cultural landscapes; enhancing visitor facilities and extending and upgrading the walking and cycling networks in between to promote a sense of place and ownership for all who work in, visit and live in London • To secure a network of high quality, well designed and multi-functional green open spaces to establish a crucial component of urban infrastructure able to address the environmental challenges of the 21st century – most notably climate change The ALGG SPG is a key document for delivering improvements to the green infrastructure network and to facilitate the identification and delivery of programmes and projects promoted by the borough and their partners. The SPG : • Provides guidance on the implementation of all relevant policies in the London Plan to local neighbourhoods, boroughs, developers and other delivery partners; • Sets out a vision and spatial framework for London-wide green infrastructure; • Promotes partnership working across the 11 Green Grid Areas within London and beyond via Green Arc Partnerships • Identifies strategic green infrastructure opportunities	within the Brent Valley and Barnet Plateau draft SPG.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	The 11 Area Framework documents expand on the strategic opportunities set out in the ALGG Supplementary Planning Guidance. The Area Frameworks identify projects that would deliver London's network of green infrastructure by: • Establishing a comprehensive baseline understanding of each area • Defining a vision, area objectives and strategic opportunities for each area • Identifying the specific projects that can improve and enhance green infrastructure in the area • Encouraging partnership working and a more joined up approach to allocating resources	
London View Management Framework, GLA, March 2012	Policies 7.11 and 7.12 of the London Plan establish the London View Management Framework, which seeks to designate, protect and manage 27 views of London and some of its major landmarks. The London View Management Framework SPG provides guidance on the policies in the London Plan for the protection of strategically important views in London. The SPG also contains management plans for each of the 27 views designation in the London Plan. The Management Plans contain Visual Management Guidance to draw attention to the general principles for management development in the foreground, middle ground and background of the view and for managing the view location.	IIA objectives should reflect the importance of protecting the setting of important buildings. The Local Plan policies should seek to protect the established strategically important view corridors.
Green Infrastructure and Open Environments: Preparing Borough Tree and Woodland Strategies, GLA, February 2013	This SPG was prepared jointly with the Forestry Commission, and provides guidance on the implementation of the London plan Policy 7.21 to protect, maintain and enhance trees and woodland in London. The SPG has been produced to provide to assist local authorities in the task of producing their own comprehensive tree and woodland strategy, so that any strategy maximises the benefits trees and	IIA objectives should reflect the need to promote green infrastructure within the borough. The Local Plan should contain policies which seeks to improve and enhance the borough's green infrastructure.

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	woodlands can bring to the residents and businesses of an area. A consistent approach to producing strategies will also enable the co-ordination of work managing the resource cross borough boundaries to bring cumulative benefits such as tackling climate change impacts.	The Local Plan should contain policies that seek to protect trees, groups of trees or woodlands within the borough that provide amenity.
Managing Risks and Increasing Resilience: The Mayor's Climate Change Adaption Strategy, GLA, October 2011	The Mayor's climate change adaptation strategy is one of eight environmental strategies setting out the action the Mayor is taking, and encouraging others to take, to green London, retrofit London, and provide cleaner air for London. This strategy focused on how London will adapt to the climate change and its association issues. The aim of the London Climate Change Adaptation Strategy is to assess the consequences of climate change on London and to prepare for the impacts of climate change and extreme weather to protect and enhance the quality of life of Londoners. The aim will be met through achieving the following objectives: 1. Identifying and prioritise the climate risks and opportunities facing London and understand how these will change through the century 2. Identify and prioritise the key actions required to prepare London, and to define where responsibility for delivering and facilitating these actions lies 3. Promote and facilitate new development and infrastructure that is located, designed and constructed for the climate it will experience over its design life 4. Improve the resilience of London's existing development and infrastructure to the impacts of climate change 5. Ensure that tried and tested emergency management plans exist for the key risks and that they are regularly reviewed and tested 6. Encourage and help business, public sector organisations and other institutions prepare for the challenges and opportunities presented by climate change	IIA objectives to reflect the need to meet the challenge of climate change and promote energy efficiency. The Local Plan should take into account the Mayor's Climate Change Adaption Strategy. The Local Plan should consider issues around climate change. The Local Plan should explore measures/methods on how the borough will adapt to the impacts of climate change.

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	7. Promote and facilitate the adaptation of the natural environment 8. Raise general awareness and understanding of climate change with Londoners and improve their capacity to respond to changing climate risks 9. Position London as an international leader in tackling climate change The strategy is the first step in determining the 'adaptation gap' for each climate impact in London and exploring the adaptation options to close the gap. The Mayor will work with partners to identify the risk management options, assess the 'true' value of these options and then develop flexible adaptations pathways for each climate risk.	
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London Environment Strategy, GLA, May 2018	The London Environment Strategy sets out the Mayor's aspiration to help turn London into a zero carbon city by 2050, and is an integrated environment strategy for London that combines policy and action. The strategy sets out the following environmental challenges: Air quality, green space, biodiversity, greenhouse gas emissions, energy use, waste, flood risk, heat risk, water scarcity, river water quality and ambient noise. The Mayor outlines four strategic approaches to master the most of environmental opportunities now and in the future. These are: • Low carbon circular economy • Smart digital city • Green infrastructure and natural capital accounting • The Healthy Streets Approach The strategy sets out the following aims: • London will have the best air quality of any major world city by 2050, going beyond the legal requirements to protect human health and minimise inequalities	IIA objectives to reflect the need to meet the challenge of climate change and promote energy efficiency, with the aim of reaching zero carbon by 2050 The IIA objectives should reflect the objectives of the Mayor's Environment Strategy IIA objectives to reflect the need to reduce carbon emissions and waste The Local Plan should consider issues around climate change The Local Plan should explore measures/methods on how the borough will mitigate against the

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	• London will be the world's first National Park City where more than half of its area is green; where natural environment is protected and the network of green infrastructure is managed to benefit Londoners • London will be zero carbon city by 2050, with energy efficient buildings, clean transport and clean energy • London will be a zero waste city. By 2026, no biodegradable or recyclable waste will be sent to landfill, and by 2030 65% of London's municipal waste will be recycled • London and Londoners will be resilient to severe weather and longer-term climate change impacts. This will include flooding, heat risk and drought • Londoners' quality of life will be improved by reducing the number of people adversely affected by noise and promoting more quiet and tranquil spaces • A number of objectives, policies and proposals in relation to enabling the transition to a low carbon circular economy	impacts of climate change and encourage a low carbon circular economy, a smart digital city, green infrastructure and the healthy streets approach
London's Waste Resource: The Mayor's Municipal Waste Management Strategy, GLA, November 2011	The strategy sets out what action London's households and businesses can take to reduce waste and also calls on the government and industry to play a role. The strategy identifies the following objectives: 1. Provide Londoners with the knowledge, infrastructure and incentives to change the way they manage municipal waste: to reduce the amount of waste generated, encourage the reuse of items that are currently thrown away, and to recycle or compost as much material as possible 2. Minimise the impact of municipal waste management on our environment and reduce the carbon footprint of London's municipal waste 3. Unlock the massive economic value of London's municipal waste within London's boundary, through investment in new waste infrastructure	The IIA should consider the issues around waste and recycling and the possibility of utilising waste as a means of power generation. The IIA objectives should reflect the objective contained within the Mayor's Waste Strategy The Local Plan should consider issues around waste management. Waste management should be considered alongside other spatial concerns. The Local Plan should consider issues around waste and the possibility of

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	4. Manage the bulk of London's municipal waste within London's boundary, through investment in new waste infrastructure The Mayor's key targets for the management of London's municipal waste are as follows: 1. To achieve zero municipal waste direct to landfill by 2025 2. To reduce the amount of household waste produced from 970kg per household in 2009/10 to 790kg per household by 2031. This is equivalent to a 20% reduction per household 3. To increase London's capacity to reuse or repair municipal waste from approximately 6,000 tonnes a year in 2008 to 20,000 tonnes a year in 2015 and 30,000 tonnes a year in 2031. 4. To recycle or compost at least 45% of municipal waste by 2015, 50% by 2020 and 60% per 2031 5. To cut Londoner's greenhouse gas emissions through the management of London's municipal waste, achieving annual greenhouse gas emissions savings of approximately: ○ 545,000 tonnes of CO₂ eq in 2015 ○ 770,000 tonnes of CO₂ eq in 2020 ○ One million tonnes of CO₂eq in 2031 6. To generate as much energy as practicable from London's organic and non-recycled waste in a way that is no more polluting in carbon terms than the energy source it is replacing. This is estimated to be possible for about 40% of London's municipal waste after recycling or composting targets are achieved by 2031. To achieve the above objectives and targets, the strategy focuses on six policy areas, each of which contains a number of proposals. The 6 policy areas are: 1. Informing producers and consumers of the value of reducing, reusing and recycling municipal waste	utilising waste as a means of power generation. The Local Plan should contain policies that contribute to achieving the waste targets set out in the London Plan.

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	2. Reducing climate change impact of London's municipal waste management 3. Capturing the economic benefits of municipal waste management 4. Achieving high recycling and composting rates resulting in the greatest environmental and financial benefits 5. Stimulating the development of new municipal waste management infrastructure, particularly low carbon technologies 6. Achieving a high level of street cleanliness	
Securing London's Water Future, GLA, October 2011	The Mayor's Water Strategy is the first water strategy for London and provides a complete picture of London's water needs. The strategy calls for organisations involved in the city's water management to: • Invest in a water management and sewerage infrastructure system that's fit for a world class city and will create jobs • Support and encourage Londoners to take practical actions to save water, save energy and save money off their utility bills • Realise the potential of London's sewerage as an energy resource to help reduce greenhouse gas emissions • Work in partnership with the Mayor, boroughs and communities to seek and develop opportunities to manage flood risk through enhancing London's green spaces The Mayor's water strategy sets out the following objectives: 1. To use the water London already has more efficiently and effectively 2. To minimise the release of untreated wastewater and diffuse pollution into the water environment 3. To manage, and where possible reduce, the threat of flooding to people and their property 4. To reduce the greenhouse gas emissions produced from supplying water and treating wastewater.	IIA objectives to reflect the need to improve water quality. The IIA objectives should reflect the objectives identified within the Mayor's Water Strategy. IIA objectives to reflect the need to address flooding and water management. The Local Plan should consider issues around the protection of water quality and SuDS. The Local Plan should consider the issues around water management within Brent and promote the use of Sustainable Urban Drainage Systems (SuDS)

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Clearing the air: The Mayor's Air Quality Strategy, GLA, December 2010	The Air Quality Strategy sets out how the Mayor will achieve his vision for air quality in London. It details the actions that the Mayor will take to reduce air pollution in the capital using the powers available to him and sets a framework for boroughs to take action. The overarching aim of the Strategy is to reduce air pollution in London so that the health of London is improved. The Mayor's vision for air quality is as follows: <i>To protect the health of Londoners and enhance their quality of life by significantly improving the quality of the air we breathe in London. This will:</i> • <i>Make London a more pleasant place to live and work in</i> • <i>Reduce the burden on health services in the capital</i> • <i>Enhance London's reputation as a green city – making it more attractive to tourists and businesses</i> • <i>Make Londoner cleaner whilst safeguarding its biodiversity</i> The first priority of the strategy is to achieve Greater London EU limit values for local air pollutants, PM₁₀ and NO₂. This will be achieved through undertaking the following measures: • Reducing emissions from transport by ○ Encouraging smarter choices and sustainable travel behaviour ○ Promoting technological change and cleaner vehicles ○ Reducing emissions from the public transport and public transport fleets ○ Using emissions control schemes to reduce emissions from private vehicles • Targeting air quality priority locations by: ○ Adopting local measures, including trialling new processes (such as the use of dust suppressants)	The IIA will consider the impact that the proposed policy/developments within the emerging Local Plan will have on air quality in the borough. IIA objectives to reflect the need to improve air quality. The IIA objectives should reflect the objectives identified the Mayor's Air Quality Strategy. The Local Plan and IIA will take account of the Mayor's Air Strategy. Where appropriate, the Local Plan should include policies which promote measures that improve air quality.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	○ Using action days to encourage behaviour change and reduce pollution in priority areas • Reducing emissions from homes, business and industry by: ○ Promoting and delivering energy efficiency schemes ○ Using the planning system to reduce emissions from new developments ○ Updating and implementing best practice on construction and demolition • Increasing awareness of air quality issues by: ○ Improving access to information about the health impacts of poor air quality ○ Directing information about poor air quality to those most at risk	
The London Health Inequalities Strategy, GLA, September 2018	The London Health Inequalities Strategy sets out a vision to tackle inequalities. It recognises that reducing persistent and widening health inequalities requires commitment and action from a range of organisations, and focuses on areas where the Mayor can make the most difference, through to 2028. Five key aims are: • Healthy Children: Every London child has a healthy start in life • Healthy Minds: All Londoners share a city with the best mental health in the world • Healthy Places: All Londoners benefit from an environment and economy that promotes good mental and physical health • Healthy Communities: London's diverse communities are healthy and thriving • Healthy Living: The healthy choice is the easy choice for all Londoners The Mayor's key ambitions are:	IIA objectives to reflect the need to improve health for all residents of the borough. The IIA objectives should reflect the objectives of the Mayor's Health Inequalities Strategy The Local Plan to ensure that is sufficient social infrastructure to support the proposed developments and the current and future population of the borough. The Local Plan should contain policies which ensure health provision is available for all residents of the borough.

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	• To ensure the widespread adoption of the Healthy Early Years Programme London, particularly in the most deprived communities • For more Londoners to be trained in mental health first aid informed approaches, starting with young Londoners • For London to have the best air quality of any major global city, with the quickest progress to be made in the most polluted places • To support more Londoners in vulnerable or deprived communities to benefit from social prescribing • All Londoners are doing the physical activity they need on a daily basis to stay healthy, with efforts focused on supporting the most inactive An implementation plan has been developed by the Mayor and key partners that sets out initial actions to deliver these objectives. Full implementation can only be achieved through a combination of the Mayor's actions and actions of partners, including local and national government.	
The Mayor's Economic Development Strategy for London, GLA, December 2018	The strategy provides a long-term vision for London's economy, setting out plans to create a fairer, more inclusive city with an economy that works for all Londoners. It outlines 14 ambitions for London's economy in 2041: • Londoners are living healthier and happier lives • Living standards are improving with real incomes growing year-on-year • London has a fairer and more inclusive economy • London is a more affordable city to live and work • Londoners who want to work, and are able to, have access to quality employment and training opportunities	The IIA should assess the impact that the policies/proposals within the Local Plan will have on Brent's economy The IIA objectives should reflect the objectives of the Mayor's Economic Strategy. The Local Plan should ensure that the economic growth is catered for in Brent.

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	• London has the most skilled and talented workforce in the world • London is a global leader in innovation and creativity • London remains the world capital for business, trade and investment • London is the best city in which to start and grow a business • More people are walking, cycling and using public transport to travel, helping London to grow sustainably • London is cleaner, greener and ready for the future • London plays a leading role in the global transition to a low carbon circular economy • London has higher productivity relative to other global cities • London continues to contribute to the UK economy so that London and the UK grow together The strategy includes a number of actions which detail what the Mayor will do to achieve the above vision. Such actions include: • Working with London schools, colleges, providers, businesses, universities and London Boroughs to develop a coherent and accessible all-age careers information, advice and guidance offer • Work with trade unions, employers across key sectors and partners across the voluntary, community and social enterprise sector to increase employment rates for groups who are currently underrepresented in London's workforce • Help to increase the supply of housing including affordable homes and help make private renting more affordable • Promote fair pay and good employment practices through the Good Work Standard and help establish London as a Living Wage City •	
Green infrastructure and Open Environments:	This SPG provides guidance on London Plan (2011) policy 7.20, which seeks to protect and promote geodiversity in London.	IIA objective to reflect the need to protect and promote geodiversity

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Protecting the Geodiversity of the Capital SPG, GLA and London Geodiversity Partnership, March 2012	The SPG: • Reviews existing guidance and criteria for geodiversity assessment • Undertake a geodiversity audit of London, including: a regional geodiversity overview; a description of methods and criteria use for the audit; a map and description of each recommended RIGS; good practice guidance on geoconservation for the London Boroughs • Outlines further actions needed to facilitate the implementation and future development of the Geodiversity Action Plan(GAP) for London	The IIA and Local Plan to take into account this SPG.
Improving Londoners' Access to Nature: London Plan Implementation Report, GLA, February 2008	Improving Londoners Access to Nature is an implementation report which provides non-statutory advice that demonstrates how the aim of improving access to nature can be achieved by identifying opportunities. The report provides details the Mayor's Role, priority sites for alleviating deficiency, priority borough wildlife sites for enhancing access to nature, priority sites for reducing areas of deficiency, the opportunities within the planning and development process, working in partnership and the cost of enhancements.	IIA Objectives should reflect the importance of improving access to green and natural spaces The Local Plan should identify opportunities to improve access to the borough's wildlife sites and open spaces.
London Environment Strategy, GLA, May 2018	The Mayor's Environment Strategy sets out a vision for London's environment, and the Mayor's ambition for London to be the world's greenest global city. The strategy brings together a number of approaches which seek to address a number of areas which impact London's environment, which include: air quality, green infrastructure, climate change mitigation and energy, waste, adapting to climate change, ambient noise and low carbon circular economy.	IIA objectives should reflect the priorities of the Environment Strategy and translate them, as appropriate, to local level.

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Planning for Equality & Diversity in London, GLA, October 2007	The SPG provides guidance on how to implement key London Plan policies which relate to addressing the needs of London's different communities, to ensure that the implementation of the London Plan achieves the Mayor's vision. The document is formed of four different parts, which are as follows: • Part 1 – a brief introduction to the SPG and its purpose • Part 2 – Promoting equality and diversity in planning processes – deals with the legislative context to planning for equality, explores equality implications in the new planning system and explains some of the tools that are already available to address equality issues in planning – such as Equality Impact Assessments and Sustainability Appraisals – and set out processes to ensure effective consultation and engagement with equality groups • Part 3 – The key spatial and social issues for London – introduces the complex relationship between spatial planning and wider social issues in the London context of diversity and multiculturalism, it explores how spatial planning can be used to help address inequality and disadvantage and promote community cohesion and identifies key spatial issues for achieving this. • Part 4 – Addressing the spatial needs of target equality groups – considers the key spatial issues faced by each of the equality groups as a result of wider social issues. This parts set out where planning can make a positive impact, with implementation points where appropriate and signposts to further information.	IIA objectives should reflect the equality and diversity issues contained within the SPG. The Local Plan should include policies which relate to equality and diversity.
Inclusive London: The Mayor's Equality, Diversity and Inclusion Strategy, GLA, May 2018	The Strategy sets out how, in all his policies and programmes, the Mayor will work to address various problems (child poverty, disparities in educational attainment, inaccessible transport, employment and pay gaps, knife crime), helping to create a fairer and more inclusive city. 39 objectives are set, which fall under the following chapters:	IIA Objectives should reflect the equality and diversity issues contained within the strategy. The Local Plan should include policies which relate to equality and diversity.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	• A great place to live • A great place to grow up • A great place to work and do business • Getting around • A safe, healthy, green and enjoyable city The strategy also outlines how the Mayor will lead by example in relation to equality and diversity.	
The Mayor's Food Strategy: Healthy and Sustainable Food for London, GLA, December 2018	The Mayor's Food Strategy for London provides a framework to help all Londoners, London Boroughs and partners adapt the city's food system to meet the challenges that lie ahead. The strategy sets out a definition of 'good food', then outlines six key settings. Actions are then derived from each of these key settings. These actions are divided into what the Mayor will do to deliver change, what the Mayor will do to support change, and priorities to be led by external partners. Key settings and aims are: • Good food at home, and reducing food insecurity Aim: Help to ensure all Londoners can eat well at home and tackle rising levels of household food insecurity • Good food economy, shopping and eating out Aim: support good food businesses to improve London's food environment and make healthy, affordable options more widely available to Londoners • Good food in community settings and public institutions Aim: work with public sector partners to improve their food procurement for the communities they serve • Good food for pregnancy and childhood Aim: use good food to help give Londoners the best possible start to life	The IIA objectives should reflect the objectives of the Mayor's food strategy. The Local Plan should include policies which encourage a vibrant food economy and strengthen the borough's food security.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	• Good food growing, community gardens and urban farming Aim: Promote the multiple benefits of food growing for individuals and communities • Good food for the environment • Aim: reduce the environmental impact of our food system by making it more efficient, more sustainable and less wasteful	
Souder City: The Mayor's Ambient Noise Strategy, GLA, March 2004	The Strategy focuses on reducing noise through better management of transport systems, better town planning and better design of buildings. It identifies practical actions and way forward, especially in transport and through the planning system. The overall vision for the Mayor's Ambient Noise Strategy is to minimise the adverse impacts of noise on people living and working in, and visiting London using the best available practices and technology within a sustainable development framework. To achieve this vision, the Strategy sets the following objectives: • to minimise the adverse impacts of road traffic noise; • to encourage preferential use of vehicles which are quieter in their operating conditions; • to minimise the adverse impacts of noise from freight and servicing • to promote effective noise management on rail networks in London • to minimise the adverse impacts of aircraft noise in London, especially at night • to minimise the adverse impacts of noise on or around London's rivers and canals, while retaining working wharves and boatyards, and enhancing water space tranquillity and soundscape quality;	IIA objectives to consider the impact that the policies/proposals contained within the Local Plan will have on the ambient noise levels of the borough. The IIA objectives should reflect the objectives of the Mayor's Ambient Noise Strategy.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	• to minimise the adverse impacts of industrial noise, recognising the use of best practicable means/best available techniques, and the need to retain a diverse and sustainable economy; • to improve the noise environments in • London's neighbourhoods especially for housing, schools, hospitals and other noise-sensitive uses; • to protect and enhance the tranquillity and soundscape quality of London's open spaces, green networks and public realm	
Mayor's Biodiversity Strategy: Connecting with London's Nature, GLA, July 2002	The Mayor's Biodiversity Strategy aims to protect and enhance the natural habitats of London together with their variety of species. It contains proposals, commitments and targets for the promotion by the Mayor of biodiversity in London. The strategy provides the strategic framework within which the actions plan (identified within London's Biodiversity Action Plans and the Strategy itself) sit. The Strategy sets out the following objectives: • Biodiversity for people: to ensure all Londoners have ready access to wildlife and natural green spaces. Access to nature provides psychological, educational and health benefits – an antidote to the stresses of urban life – and the Strategy aims to maintain and increase access to natural green space. • Nature for its own sake: to conserve London's plants and animals and their habitats. • Economic benefits: to ensure the economic benefits of natural greenspace and greening are fully realised. • Functional benefits: to ensure London enjoys functional benefits that biodiversity can bring. • Sustainable development: to recognise biodiversity conservation as an essential element of sustainable development.	IIA objectives to reflect the need to protect and promote biodiversity. The IIA should assess the impact that the policies/proposals contained within the Local Plan will have on the borough's biodiversity. The Local Plan should include policies which seek to protect and enhance the borough's biodiversity. The Local Plan should include policies which promote the incorporation of biodiversity in new developments.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	Proposals contained within strategy include: • The Mayor will work with London borough councils, schools and other groups, to enable and encourage children to take an active interest in the biodiversity of their local green space • The Mayor will facilitate best practice for developing safe, convenient and enjoyable access to nature, and addressing issues of safety, anti-social behaviour and fear or crime in green spaces. • The Mayor will encourage and support all London borough councils in the establishment of local biodiversity partnerships and the production, implementation and monitoring of borough Biodiversity Action Plans as an integrated element of the delivery and implementation of Community Strategies • The Mayor will measure the success of this Strategy primarily against two targets, to ensure: ○ That there is not net loss of Sites of Importance of Nature Conservation, and ○ That the areas of deficiency in accessible wildlife sites are reduced	
London Biodiversity Action Plan, London Biodiversity Partnership, 2001	The London Biodiversity Action Plan (BAP) identifies priority habitats that are of particular importance for biodiversity in London. Many of these habitats are covered by Habitat Action Plans (HAPs). The London BAP has 11 HAPs – 9 of these are for named habitat types, while the other two are for land uses. 214 priority species were under particular threat in London.	IIA objectives to reflect the need to protect and promote biodiversity. The IIA will assess the impact that the policies/proposals contained within the emerging Local Plan will have on the borough's biodiversity. The Local Plan should include policies which seek to protect and enhance the borough's biodiversity.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
		The Local Plan should include policies which promotes biodiversity as part of new developments. Where appropriate, the emerging Local Plan should take into account the actions contained within the London BAP.
Thames Basin District River Basin Management Plan, DEFRA, 2015	The Plan provides a framework for protecting and enhancing the benefits provided by the water environment within the Thames river basin district. It also identifies significant water management issues and provides a progress update on the 2009 plan. The Plan contains 4 sets of information, which are: • Baseline classification of water bodies –establishes the current status for all the quality elements in each water body. • Statutory objectives for protected areas - highlights the areas of land and bodies of waters that have specific uses that need special protection. The plan ensures that these areas have the legally binding objectives in place that protect water uses (i.e. drinking water, bathing, commercial shellfish harvesting) from potentially harmful activities and new developments • Statutory objectives for water bodies – sets out legally binding objectives for each quality element in every water body, including an objective for the water body as a whole. The default objective is good status. • Summary programme of measures to achieve statutory objectives – provides a framework for action and future regulation. This section summarises the existing mechanisms, both statutory and voluntary, that are used to manage the quality of the water environment. It also	The IIA objectives should reflect the environmental objectives of the management plan to protect and improve water quality. The Local Plan should take into account the local measures in the management plan in terms of improving water quality.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	summarises the types of actions and who needs to do this, to achieve the statutory objectives.	
Part 2: River basin management planning overview and additional information, DEFRA, 2016	Part 2 of the Thames Basin Direct River Basin Management Plan contains a summary of technical, economy and engagement processes used to develop the Plan. This document contains information that the WFD requires to be part of each plan and provides more detail about the process the Environment Agency and others have followed in reviewing and updating the plans. It also puts river basin management planning and the plans into the wider context of managing the water environment in England.	As above.
The London Rivers Action Plan and UK Projects Map, The River Restoration Centre, January 2009	The Action Plan has been developed to provide a delivery mechanism to take forward London's river restoration strategies. The Plan will build upon the river restoration strategies success and look for river restoration opportunities. The Plan: • Supports the delivery of the Thames River Basin Management Plan under the Water Framework Directive • Contributes to sustainable regeneration through the implementation of the Blue Ribbon policies • Contributes to the implementation of the Mayor's access to nature aspirations • Supports one of the London Plan's biodiversity targets to restore 15km of river by 2015 • Supports the delivery of the Environment Agency's Thames Catchment Flood Management Plan. The five key aspirations identified within the Plan are: 1. Improve flood management using more natural processes; 2. Reduce the likely negative impacts of climate change;	The IIA objectives should reflect the environmental objectives of the plan to protect and improve water quality. The Local Plan should take into account the aspirations of the action plan and projects in the River Brent Catchment.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	3. Reconnect people to the natural environment through urban regeneration; 4. Gain better access for recreation and improved well-being; 5. Enhance habitats for wildlife.	
Brent River Corridor Improvement Plan, Brent River Catchment Partnership, 2014	The Brent River Corridor Improvement Plan identifies a number of actions that can be undertaken to improve the water quality of this catchment and achieve the outcomes listed below. The Improvement Plan contains the following vision: <i>To improve and enhance the rivers within the Brent Catchment, making them cleaner, more accessible and more attractive, to benefit local communities and wildlife.</i> The following outcomes were identified within the Plan: • By 2021, water quality in the Brent catchment has improved and has a 'moderate' ability to support wildlife; and by 2027 it will have a 'good' ability to support wildlife • Transforming up to 10km of heavily modified river to a more natural condition by 2021 • Decreasing density and distribution of invasive non-native species in chosen locations by at least 20% by 2021. • Having Giant Hogweed under a management programme in all parks, reserves and pathways by 2015 • Completing a 24-mile riverside trail from Barnet to Brentford on the Thames. • Creating or improving 12 miles of riverside access for walking, cycling and the disabled through the catchment • Creating at least to new green spaces along waterways in the Brent catchment by 2021.	The IIA objectives should reflect the environmental objectives of the plan to protect and improve water quality. The Local Plan should take into account the local measures in the improvement plan in terms of improving water quality.
Joint West London Waste Plan, 2015	Six west London Boroughs (Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond upon Thames) and the Old Oak Common and Park Royal Development Corporation (OPDC) have joined	The IIA should consider the issues around waste and recycling and the

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	together to plan for the future management of waste produced in their areas. The West London Waste Plan: • Details the estimated amounts for the different types of waste that will be produced in West London up to 2031 • Identifies and protects the current sites to help deal with that waste; • Identifies the shortfall of capacity needed over the life of the Plan (to 2031); and • Allocates a set of sites to meet the shortfall which are preferred for waste related development. In addition to the above, the Waste Plan provides policies with which planning applications for waste developments most conform.	possibility of utilising waste as a means of power generation. The Local Plan should consider issues around waste management and the possibility of utilising waste as a means of power generation. The Local Plan should contain policies which contribute to achieving the waster targets set out in the London Plan (which have been incorporated into the Joint West London Waste Plan)
West London Sub Regional Transport Plan, Transport for London, 2016 update	The update provides a comprehensive analysis of recent population and employment growth, changes in travel behaviour and areas where the transport network will have to change to cope with the challenge of future growth. The Plan aims to help boroughs with the development of Local Implementation Plan (LIP) and TfL in developing the priorities for business planning in order to address the medium to longer-term challenges for London and the sub-regions. The document identifies the following challenges to be relevant to every sub-region • Improve air quality to meet and exceed legal requirements and ensure health benefits for Londoners • Transport the role of cycling and walking the sub-region	The IIA will consider the impact that policies/proposals will have with regard to sustainable transport IIA objectives to reflect the need to promote sustainable modes of transport. The Local Plan will include policies which promote sustainable modes of transport. Where appropriate, the emerging Local Plan will help to identify and promote solutions to the west London specific challenges identified within this document.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	• Meet CO₂ targets The document identified the following challenges as being west London specific: • Enhance east-west capacity and manage congestion • Improve access to, from and within key locations • Enhance the efficiency of freight movement • Improve north-south public transport connectivity • Improve land-based air quality	
NW London Sustainability and Transformation Plan – Our plan for North West Londoners to be well and live well, NW London STP System, October 2016	The STP describes the shared ambition across health and local government to create an integrated health and care ambition across health and local government to create an integrated health and care system that enables people to live well and be well. The STP sets out how the NHS will meet the needs of the population more effectively. TP states that <i>“The focus of the STP for the first two years is to develop the new proactive model of care across NW London and to address the immediate demand and financial challenges”</i>.	The IIA and Local Plan objectives to support the NW London Sustainability and Transformation Plan.
Local		
Brent Borough Plan 2019 - 2023	The Brent Borough Plan sets out how the Council, working with partners, will build a better Brent. The Borough Plan sets out the following vision for Brent: <i>“Our vision for 2023 is to make Brent a borough of culture, empathy, and shared prosperity. A borough where people from different backgrounds feel at ease with one another, share in cultural opportunities and activities, and value the principles of fairness, equality, good citizenship and respect for people and</i>	IIA objectives should reflect and build upon the Borough Plan's vision and priorities. The Local Plan must be in conformity with the Brent Borough Plan.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	<i>place. People will feel that they and their children are safe, cared for and can achieve and that they receive excellent services when they need them. Brent will be a great place to live and work, where business and enterprise prosper and local people have opportunities to change their lives for the better."</i> The plan states that while the vision remains similar to that set out in the previous Borough Plan, the context within which we are operating continues to change. The Borough Plan is centred around five priorities: • A borough where we can all feel safe, secure, happy and healthy ○ Reduction in anti-social behaviour, risk of harm and re-offending ○ Reduction in violent crime, including gang and knife crime ○ Support our most vulnerable adults, enabling them to choose and control services they receive, remaining independent and leading active lives ○ Improve health of Brent residents ○ Make Brent a place where culture is celebrated and vibrant • A cleaner, more considerate Brent ○ Improvement in air quality ○ Reduction in illegally-dumped rubbish • A future built for everyone, an economy fit for all ○ Increase in inward investment achieved via the council ○ Produce our new Local Plan, setting out our vision, priorities and areas for future development in the borough ○ Increase in housing supply	

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	○ Reduction in number of households in temporary accommodation ○ Keep traffic moving and our roads and pavements in good repair • Every opportunity to succeed ○ Improvement in Key Stage results for Black Caribbean Boys ○ Improvement in Key Stage results for looked-after children and care leavers ○ High-level skills achievement ○ Increase in average wage • Strong Foundations ○ Enable more residents to get online ○ Making every pound count ○ Building services around residents and their needs ○ Increase in resident satisfaction ○ Increase in resident involvement	
Brent Inclusive Growth Strategy, 2019-2040, Brent Council	Brent's Inclusive Growth Strategy looks at ways to realise future opportunities in a way which will increase the borough's economic resilience and enhance its offer to residents, businesses and visitors over the next 20 years and beyond. Of equal importance will be ensuring that everyone, no matter their background, has the choice to participate and benefit from growth in the borough. To set the scene, the strategy looks at five elements: People, Place, Prosperity, Lifestyles and Globalisation. Each section looks at the key facts, trends and analysis related to the main factors viewed as likely to have an impact on the borough going forward. The strategy then looks at the top trends and council responses in relation to the following: Economy, Housing, Infrastructure, Environment, Health and Culture.	IIA objectives should reflect and build upon the trends identified and responses suggested in the strategy.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
Brent's Air Quality Action Plan 2017-2022, Brent Council	Brent's air quality action plan demonstrates how the Council will tackle air pollution at the source or reduce exposure where this is not possible. The Air Quality Action Plan identifies that Nitrogen Dioxide (NO₂) and Particulate Matter (PM₁₀) are the pollutants of most concern in the borough. The majority of Brent is within an Air Quality Management Area (AQMA). The air quality outside of the air quality management area has not worsened since 2006 and so new management areas for air quality action are proposed. The Air Quality Matrix outlines the 24 actions Brent will implement to deliver air quality improvement. These actions are split into six themes which focus on measures to reduce pollutant emissions from key sources.	The IIA of the Local Plan will consider the impact that the proposed policies/developments within the emerging Local Plan will have on the air quality in the borough. IIA objectives to reflect the need to improve air quality. The Local Plan and IIA will take account of Brent's Air Quality Action Plan, and where appropriate, contribute to its delivery.
Brent Biodiversity Action Plan, 2007, Brent Council	The Brent BAP Plan sets out actions to improve the natural environment in Brent to achieve the targets of the Local Biodiversity Action Plan. The Brent BAP includes Habitat Action Plans for the following: • Garden and Allotments • Street scene • Trees, Woodland and Hedgerows • Grasslands • Wetland Habitats • Rail-side Habitats • Churchyards and Cemeteries • Parks and Green Spaces • School Grounds • Buildings and the built environment In regards to Species Action Plan, the Brent BAP proposes to:	IIA objectives to reflect the need to protect and promote biodiversity. The IIA will consider the impacts that policies/proposals contained within the emerging Local Plan will have on the boroughs biodiversity. The Local Plan should include policies which promote the incorporation of biodiversity in new developments Where appropriate, the emerging Local Plan should take into account the actions contained within the Brent BAP.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	• Adopt and implement all the London-wide and UK Species Action Plans that are applicable, or potentially applicable, to the Brent area. • Seek 'champions' for the above and other Species Action Plans to encourage the conservation of selected individual species	
Brent's Long Term Transport Strategy, 2015-2035, Brent Council	The Long Term Transport Strategy outlines the Council's commitment to improving transport options for every member of the community and to reducing the negative impacts of transport on the borough. The Strategy provides a strategic direction for investment in transport through the borough of the period 2015-2035. Five priority areas are identified which will be focussed on during the period of the strategy. These areas are: • Road safety • Air Quality • Health • Congestion • Growth and Regeneration The Strategy also contains five objectives which have been formulated to reflect the priorities in a measurable context. These objectives are as follows: • Increase the uptake of sustainable modes, in particular active modes of travel • Reduce conventional vehicular trips on the network, particularly at peak time • Support growth areas and town centres to enable acceptable development • Reduced Killed and Seriously Injured (KSI) incidents and slight accidents on Brent's roads	IIA objectives to reflect the need to promote the use of sustainable transport. The IIA will consider the impact that the policies and proposals contained within the emerging Local Plan will have on sustainable transport modes. The Local Plan will contain policies with promote sustainable transport. The Local Plan will support the aims and objectives contained within the Long Term Transport Strategy.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	Reduce the exposure of Brent residents to Particulate Matter (PM) and Nitrogen Dioxide (NO₂) generated by the transport network These objectives have informed the targets that are set out within the document.	
Brent's Cycling Strategy, 2016-2021, Brent Council	The Cycling Strategy is a daughter document to the Long Term Transport Strategy (LTTs) and will help to implement the objectives it contains. The cycle strategy provides a framework that will enable the Council to implement works in a transparent way and prioritise funds to increase cycling through the borough. The Council's vision for cycling in Brent is: - To make Brent a borough where everyone can cycle safely, in comfort and with confidence - To enable people of all ages and abilities from every section of Brent's diverse society to see cycling as a good option for everyday travel To achieve the above vision the Strategy sets the following objectives: - Develop a coherent network of direct, comfortable and attractive cycle routes - Promote cycling as a convenient, safe, health, enjoyable and inclusive activity - Reduce the number of accidents on Brent's roads involving cyclists - Improve access to cycling for all Brent residents and businesses - Address the specific concerns that may reduce the ability of some groups to take up cycling	IIA objectives to reflect the need to promote the use of sustainable transport. The IIA will consider the impact that the policies and proposals contained within the emerging Local Plan will have on sustainable transport modes, The Local Plan will contain policies which promote sustainable transport. The Local Plan will support the aims and objectives contained within the cycling strategy.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
Brent's Walking Strategy, 2017-2022, Brent Council	The Strategy contains an Action Plan which is designed to help achieve the targets contained within the Brent Cycle Strategy and the LTTS. The Walking Strategy is a daughter document to the Long Term Transport Strategy (LTTS) and will help to implement the objectives it contains. The Council's vision for walking is: <i>"Make Brent a healthy, active and safe borough where walking is a practical and pleasant option for all"</i>. To achieve the above vision the Strategy sets the following objectives: • Provide a better environment and improve the experience of walking within the borough, ensuring it is accessible and inclusive for all • Promote walking as a healthy and sustainable way to travel as well as to increase personal activity • Improve the perceived and actual safety and security of pedestrians The Strategy contains an Action Plan which is designed to help achieve the targets contained within the Brent Walking Strategy and the LTTS.	IIA objectives to reflect the need to promote the use of sustainable transport. The IIA will consider the impact that the policies and proposals contained within the emerging Local Plan will have on sustainable transport modes. The Local Plan will contain policies which promote sustainable transport. The Local Plan will support the aims and objectives contained within the walking strategy.
Planning for Sports and Active Recreation Facilities Strategy 2008-2021, Brent Council and Sport England, 2007	The Strategy sets out a plan for the development of sport facilities in the borough between 2008-2021 and proposes local planning standards. The overall vision for the strategy is: <i>To ensure the co-ordinated, strategic development of formal and informal facilities for sport and active recreation within Brent that meets the needs of a changing multi-cultural population and provides attractive, sustainable, accessible, quality facilities that enhance the Boroughs natural and built environment. Such</i>	IIA objectives to reflect the need to ensure that there is sufficient social infrastructure to support the growing population. The Local Plan will take into account this strategy, and where appropriate assist in the delivery of sports facilities.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	<i>provision will increase opportunities for participation in sport and active recreation by all sections of the community resulting in improved health, well-being and enhanced quality of life of Brent's resident.</i> In order to achieve the above vision, a number of key objectives have been identified • Strategic Provision – to ensure there is a planned approach to the provision of a local and strategic mix of facilities • Meets need of future populations – to provide an innovative approach to the provision of facilities that can meet the future needs of a growing population • Delivers on sustainability principles – to ensure that sustainability is at the forefront of all sport and recreation provision particularly in relation to design, construction, use of natural resources and sustainable transport to assure respect for the environment. • Provides access for all – to ensure that sport and recreation facility providers commit to extensive, well managed, affordable community access for all • Maximises a facility's lifespan – to ensure that mechanisms and funding are in place to secure regularly facility maintenance to enhance the lifespan of the facility and maintain quality standards of provision • Create a safe and secure environment – to embrace a design-led approach to new sports facilities that helps to reduce crime and the fear of crime • Seeks contributions for sports provision from developers - to secure appropriate funding for sports provision from new residential development in the borough to help meet the sporting needs of a growing population	
Food Growing and Allotments strategy and	The Strategy unites allotment and food growing provision in Brent under a single vision and set of objectives and action plan.	The IIA objectives should reflect the objectives of the strategy.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
associated Action Plans, Brent Council	It highlights what is currently done well, what needs to be reviewed, objectives and opportunities for future development and how performance will be measured. The vision of the Food Growing and Allotment Strategy is to provide a range of food growing opportunities accessible to all parts of the community and to promote the benefits of a healthy lifestyle within a green borough. This vision will be achieved through the delivery of the following objectives. 1. To provide efficiently managed allotment sites that offer good value for money and are accessible to all 2. To develop and broaden the range of food growing opportunities available through increased partnership working 3. To promote the benefits of food growing as part of a healthy lifestyle within a greener borough. For each objective, the Action Plan identifies a number of actions which can assist in them being met. The Action Plan contained within the strategy has been reviewed twice; once for 2012/14 and the other for 2014/16. In the latest review contained 15 actions – 7 under objective, 4 under objective 2 and 4 under objective 3. Actions included: • 1.1 – Using the site audit list of recommended actions for allotment sites, implement prioritised improvements works and repairs as and when funding is available. • 1.5 – Review cycle stand provision • 2.4 – Investigate options for integrating food growing space provision into planning guidance on a permanent basis and explore future food growing opportunities in regeneration	The Local Plan should take into account the Council's Food Growing and Allotments Strategy

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	areas and existing housing with a view of creating new food growing spaces: ○ Inclusion in the Wembley Area Action Plan (WAAP) ○ Inclusion in the Local Development Framework ○ Timetable for designation of allotment sites as SINC ○ Complete projects at St Raphael's and Bramshill ● 3.3 – Produce a conservation plan for features of wildlife importance and protected species	
Brent School Place Planning Strategy 2019 - 2023, November 2018, Brent Council	The Brent School Place Planning Strategy identifies the Council's commitment to promoting the wellbeing, safety and achievement of Brent children and to promote high standards that help all children to fulfil their potential. The Council has a statutory duty to ensure that there are sufficient school places available for all Brent children and young people who need one. The Strategy articulated the following aspirations for Brent schools: ● All Brent schools should be good or outstanding, with an increased proportion of schools outstanding, over the duration of the strategy ● All Brent schools thrive in effective partnerships with other schools, promoting resilience and mutual support ● The Council and schools should work together to meet the challenge of providing sufficient school places ● Schools should operate in good quality, safe premises ● Children should be educated close to home ● Schools should work with their local communities they serve ● The Council and schools work in partnership to effectively meet the needs of children with Special Educational Needs and Disabilities ● The Council and schools make efficient use of resources.	IIA objectives should reflect the need to ensure that there are sufficient school places across the borough The Local Plan should take into consideration the demand for school place provision in the borough

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	The strategy outlines a set of sixteen operating principles that underpin the above aspirations. The projections used to inform the strategy indicate the following: • Much of the focus on demand for mainstream provision is on places in Reception for infant and primary schools and Year 7 for secondary schools • Where there are a number of new housing developments, growth in demand is anticipated that could change school place demand patterns. • Demand for Reception will continue to reduce before recovering to the current level in 2022. • A need for an additional 13 forms of entry by 2023/2024. • Demand for places that meet the needs of children and young people with SEND is increasing – Brent is planning to commission additional secondary special places to cater for pupils with ASD / MLD / SLD.	
Brent Equality Strategy 2019-2023, Brent Council, 2019	Sets out how effective diversity and equality practice will be fully integrated into everything that the Council does. The strategy seeks to ensure that the Council fulfils the duties placed on them by the Equality Act 2010. The develop the council's equality objectives, the council consulted with the community and its partners. The strategy sets out the following objectives: 1. Understand the barriers to equality experienced in Brent and act to remove them 2. Provide accessible information and services that are tailor to peoples' needs 3. Tackle hate, harassment and victimisation 4. Lead the way in encouraging diversity to flourish in Brent	IIA objectives should reflect the equality objectives outlined in the strategy. The Local Plan should include policies which relate to equality and diversity.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	The Equality Strategy states that an action plan will be created setting out how the council will measure progress against these objectives. This will be reviewed regularly.	
Financial Inclusion Strategy, September 2015, Brent Council	The Council's Financial Inclusion Strategy focuses on how the Council will create an inclusive environment where individuals are confident and capable of making the right decisions for themselves and their families. The strategy has four strategic objectives, which are: • Help residents to move from unemployment or low skill/pay employment to sustainable and fulfilling employment; • Helping residents overcome high levels of debt and promote responsible borrowing • Improve access to mainstream financial products and services whilst encouraging residents to build their awareness of financial services and make appropriate choices with their finances; and • Maximising opportunities for delivering financial inclusion through working in partnership The strategy details the Council's 'what works' approach to particular challenges of financial exclusion. It also proposes to create a high level Financial Inclusion Partnership that and that the council facilitates working groups as far as reasonably practical.	IIA objectives to reflect the need to ensure high quality employment opportunities and encourage enterprise and innovations The IIA will include consideration of the potential effects of the emerging Local Plan on the economy and employment. The IIA and Local Plan will take into consideration the Financial Inclusion strategy
Brent Health & Wellbeing strategy, 2014-2017, Brent Council and NHS Brent	The Health and Wellbeing Strategy seeks create an environment in Brent that enables individuals and families to lead healthy lives, and where health and wellbeing is at the heart of service delivery. The aim of the Health and Wellbeing Strategy is to • Improve health and wellbeing • Reduce health inequalities The strategy identifies a number of priority areas, which includes: • Giving every child the best start in life • Helping vulnerable families	IIA objectives to reflect the need to address the cause of poor health and wellbeing. IIA to assess the health impacts that the policies and proposals contained within the emerging Local Plan will have on the current and future population of the borough.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	• Empowering communities to take better care of themselves • Improving mental wellbeing • Working together to support the most vulnerable adults in the community For each priority area, the key issues have been highlighted and a number of objectives identified.	The Local Plan should consider public health. The Local Plan should contain policies which ensure health provision is available for all residents of the borough.
Safer Brent Partnership Community Safety 2018-2021 strategy, Brent Council	The Safer Brent Partnership Community Safety Strategy sets out how crime and anti-social behaviour will be tackled, and outlines the main priorities for the Community Protection team. The strategy is intended to complement and join up with the Stronger Communities Strategy, with this strategy focusing on mitigating crime, abuse and disorder as it occurs. The updated priorities for the 2018-2021 strategy are: • Reducing Domestic and Sexual Abuse • Reducing the impact of Gangs and / or Knives in our community • Reducing Vulnerability and increasing Safeguarding • Reducing Offenders and Perpetrators from Reoffending • Reducing Anti-Social Behaviour	IIA objectives to reflect the need to improve community safety and reduce crime. The Local Plan to take into account the Council's Safer Brent Partnership Community Strategy.
Stronger Communities Strategy 2019-2023, Brent Council	The Stronger Communities Strategy sets out the Council's four-year strategic approach to sustaining and building stronger communities. The strategy is central to the council's overall vision set out in the Borough Plan (2019-2023), which is to make Brent a borough of culture, empathy and shared prosperity. The over-arching aim of Brent: Stronger Together is to work with partners, communities and residents to make Brent stronger, more active and cohesive. The following elements are integral to the priorities of this strategy:	IIA objectives to reflect the need to improve quality. IIA objectives to reflect the need to improve community safety and reduce crime. The Local Plan to take into account the Council's Stronger Communities Strategy.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	• Tackling poverty • Tackling extremism • Engaging new and emerging communities • Tackling underachievement • Promoting gender equality A number of commitments are made in relation to each of the priorities above.	
Employment, skills and enterprise strategy 2015-20, Brent Council	The Employment, Skills and Enterprise Strategy sets out how Brent aims to capitalise on the growth opportunities available in Brent (such as at Old Oak Common, Wembley and Alperton) by ensuring that the new investment brings new jobs as well as new homes and by making sure that the Borough's established businesses and residents are able to benefit first hand from the new opportunities created. The vision of the strategy is <i>"to reduce inequality and raise living standards in Brent through economic growth and employment"</i>, with a long-term ambition that in 20 years the levels of employment in Brent will be comfortably above the London average. The Strategy has the following strategic objectives: • To promote economic growth through regeneration, increasing the number of local jobs providing new opportunities for local businesses • To ensure that local education and skills provision is reflective of the demands of the labour market, providing a labour pool made up of well qualified and highly motivated individuals • To have a strong focus on addressing inequality by reducing economic and social polarisation within our most deprived neighbourhoods and amongst those residents who are furthest away from work.	The IIA will include consideration of the potential effects of the emerging Local Plan on the economy and employment IIA objectives to reflect the need to improve education and skills IIA objectives to reflect the need to encourage high quality employment opportunities and encourage enterprise and innovation. The Local Plan should seek to protect and enhance the borough's employment and industrial land to ensure employment needs are met.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	• To reduce poverty through employment and progression in work • To secure increased local influence over national and regional employment programmes so as to deliver better outcomes for Brent residents A number of outcomes is associated with each strategic objective which will help to deliver the vision of the strategy.	
A Regeneration Strategy for Brent 2010-2030, Brent Council	The Regeneration Strategy aims to proactively respond to the opportunities and challenges brought by the new political and economic environment. The Strategy includes the following strategic priorities: • To deliver transformation change across the borough, focusing primarily on the identified priority areas for investment. These areas are Alperton, Burnt Oak, Chalkhill, Church End, Harlesden, North Circular (Including Brentfield and St Raphael's), Stonebridge, South Kilburn and Wembley. • To increase employment and income levels of Brent resident's concentration on those most in need. • To maximise investment in Brent from the private, public and community sectors in line with our regeneration priorities and ambitions Associated with each strategic priority is a number of actions. The Strategy also identifies a number of performance indicators for each strategic priority to enable the success of this strategy to be measured.	The Local Plan and IIA will take into account the Regeneration Strategy.
Capital Investment Strategy, 2016-2020, Brent Council	The Capital Investment Strategy sets the framework through which the capital programme helps to deliver the Council's key priorities. The investment strategy shifts the focus of the Council's capital expenditure plans from on "fundamental" of "game-changing"	The Local Plan an IIA will take into account the Capital Investment Strategy

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	investment in infrastructure with the potential to transform the long term economic prosperity of the borough and its residents. The initial focus of the strategy is on meeting short-term housing need, through the temporary accommodation reform strategy. Over the medium to longer term the focus of the investment strategy will shift to ensure the opportunities in the borough can be seized. This will include: • Investment in major development sites – OPDC, Wembley & Alperton Housing Zones; Harlesden, Stonebridge and Willesden opportunity sites; regeneration in church end and bridge park • Revitalising high streets as major retail destinations • Examining the case for investment in heat networks and power generation • Considering how to attract more jobs, and more high quality jobs in the borough • Strategic property acquisitions to enable regeneration	
Flood Risk Management Strategy, Brent Council	The Flood Risk Management details the actions that the Council and other key stakeholders are taking to manage flood risk in Brent. It sets out the flood risk in Brent, by discussing the flood history, the geography of Brent, likely sources of flood and the overall risk of flooding for Brent. The strategy has the following five Objectives: • Improving the understanding of flooding risks in Brent. • Reducing the risk of flooding for people and businesses in Brent. • Providing clear information on the roles and responsibilities of everyone involved in flood risk management in Brent.	IIA objectives to reflect the need to address flooding The Local Plan will support the implementation of the flood risk management strategy.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	- Ensuring that emergency plans and responses to flood incidents in Brent are effective. - To take a sustainable and holistic approach to flood management, seeking to deliver wider environmental and social The Strategy includes a summary of actions, each of which is relevant to one of the above objective that Brent Council and other relevant stakeholders are undertaking to deliver the objectives of the Strategy.	
Climate Change Strategy, Brent Council	The Council's Climate Change Strategy identifies the possible impacts of climate change on the borough and identifies the opportunities and challenges the Council needs to take into account when planning to tackle climate change. The Strategy has the following three aims: - To cut emissions produced by the borough - To enable Brent to cope with extreme weather - To adapt to climate change To achieve the above aims, the strategy set out the following 5 objectives: - To secure commitment from all relevant partners to act - To achieve wide-ranging and inclusive solutions to the challenges of climate change - To provide user-friendly information to those who need it - To collect evidence and continually assess progress - To mainstream climate change into our everyday activities	The IIA should consider the potential impacts of the emerging Local Plan in terms of issues around climate change. The IIA objectives should be in line with the objectives identified within this strategy The Local Plan should consider issues around climate change. Where applicable, the emerging Local Plan should support the aims and objectives of the Council's Climate Change Strategy
Draft Housing Strategy, 2017 – 2022, Brent Council	The 2017-2022 draft Housing Strategy updated the 2014 housing strategy to take into account the political and economic changes. The draft housing strategy has the following ambition:	IIA objectives should reflect the need to secure housing and meet identified need, particularly affordable housing.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	<i>“A housing market that provides a range of housing options to meet the diverse needs and aspirations of Brent’s residents, enables social and economic mobility and supports access to decent, affordable accommodation for all”.</i> The Strategy also identifies a number of priorities and objectives, which are as follows: • Housing Supply. ○ Priority – to significantly increase the supply of affordable housing ○ Objective (Affordable Housing Supply) – to increase the capacity to meet housing needs and support social mobility through the provision of 5,000 Affordable Rent and Low-cost Home Ownership properties by 2019. ○ Objective (Larger house and reducing overcrowding) – to ensure that at least 35% of new general needs affordable rented housing is 3 bedroom or larger, to align with the demand profile. To halve severe overcrowding in the social housing sector by 2019. ○ Objective (Private renting and low cost home ownership) – the development of 1,000 build-to-rent homes by 2019, of which at least 30% are affordable to those on lower incomes ○ Objective (Supported housing supply) – to deliver a programme of extra-care and specialist supported housing units by 2019 to widen housing options and reduce reliance on residential care • Housing and wellbeing ○ Priority – to promote wellbeing and reduce economic and social exclusion through an integrated approach to housing and wider service provision	The Local Plan should seek to provide enough dwellings to meet the boroughs objectively assessed need. The Local Plan will take into account the draft Housing Strategy.

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	○ Objective (Integrated Housing and Employment Support) – to integrate housing advice and management services with employment guidance and support ○ Objective (economic and Social Deprivation) - to reduce economic and social polarisation by achieving significant convergence between priority neighbourhoods and the borough as a whole by 2019 ○ Objective (Energy Efficiency and Fuel Poverty) - to improve the energy efficiency of the housing stock through programmes of retrofit works ○ Objective (Tenancy Strategy and Allocations) – to foster support wellbeing through access to suitable and affordable housing ● Private renter sector improvement ○ Objective - To maximise the contribution of the private rented sector to meeting housing need and demand through the provision of decent and well-managed accommodation ○ Objective (Standards) - for all private rented properties in the borough to achieve minimum standards of management and condition by 2019 ○ Objective (Access) – to establish a lettings agency and other arrangement to increase access to meet housing need ● Homelessness and allocations ○ Objective - to significantly reduce levels of homelessness and the use of temporary accommodation ○ Objective (Prevention) – to reduce the number of homeless acceptance s to below the London average by 2019#	

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	○ Objective (Temporary Accommodation) – (a) to minimise the use of Bed and Breakfast Accommodation and eliminate the use of non-self-contained B&B for more than six weeks. (b) To reduce the number of households in temporary accommodation to the London average by 2019 ● Social Housing Improvement ○ Objective - to improve the quality of the existing social housing stock and ensure its efficient use ○ Objective (Council Housing Investment) – to maintain the decent homes standard and complete a programme of maintenance and improvement across the council's housing stock by 2021 ○ Objective (Maximising Use of Social Rented Homes) – to maximise the efficient use of the social housing, achieving top quartile performance	
Fit for Life, A Physical Activity Strategy for Brent, 2016-2021, Brent Council	This strategy follows on from the success of the 2010-2015 Health and Wellbeing Strategy and seeks that by “2021 more people in Brent will be more active and there will be improved health and wellbeing through the borough. This will be achieved by establishing physical activity as a fundamental and enjoyable part of people's lives The Strategy has the following Objectives, which will, be achieved through carrying out the actions identified within the Action Plan included with Chapter 9 of the strategy: 1. To increase participation in physical activity through the development of a core offer accessible to everyone 2. To develop sustainable and long term local community approaches to encouraging more people to adopt healthy lifestyles 3. To achieve permanent behaviour change by helping people to build physical activity into the fabric of their everyday lives	IIA objectives to promote health and wellbeing IIA objectives to reflect the need to address the cause of poor health and wellbeing. IIA to assess the health impacts that the policies and proposals contained within the emerging Local Plan will have on the current and future population of the borough. The Local Plan should promote health and well-being

Appendix 3 - Habitat Regulation Assessment

1. Introduction

- 1.1 This report provides information in support of the Habitats Regulations Assessment (HRA) of the Preferred Options Brent Local Plan. The objective of the HRA is to establish whether the policies and proposals –either alone or in combination with other plans and projects – will have a likely significant effect on any site designated under European Law for its nature conservation interest. If the HRA establishes that this is the case, then an Appropriate Assessment (AA) will be required to ascertain whether or not the plan or project will have adverse impact on the integrity of site(s).
- 1.2 The HRA and Integrated Impact Assessment (IIA) have been conducted separately due to the assessment processes having different aims, emphasis and level of detail.

2. Background Information

- 2.1 A Habitat Regulation Assessment (HRA) is a legal requirement and seeks to determine whether any plan or project will have a 'likely significant effect' (LSE) on any European sites as a result of the plan's or project's implementation. The requirement for a HRA is set out within the EC Habitats Directive 92/43/EC, which was transposed into British Law in the Conservation of Habitats and Species Regulations 2010 (as amended). Article 6(3) of the EU Habitats Directive states that:

 'Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public'
- 2.2 The Habitats Directive provides for the legal protection of habitats and species of European Importance. An ecological network of sites is identified by the Directive and is known as 'Natura 2000'. The Natura 2000 network comprises of the following sites:
 - Special Protection Area (SPA) – a European designation which protects

- Special Area of Conservation (SAC) – a European designation which protects habitats
- RAMSAR site – a European designation which protects wetlands

2.3 Collectively, these sites are referred to as ‘European Sites’, with this term being used for the remainder of the document.

2.4 The HRA is a multi-stage process. The different stages of the HRA, and progress made against these stages, are detailed in the below table.

Stage Name	Description of Stage	Progress Made
Stage 1 – Screening	The first stage established whether there is likely to be a significant effect, alone or in combination, as a result of the plan or project on one or more European sites. Where effects are unlikely, preparing a ‘finding of no significant effect’ report. If the screening determines that there is potential for likely significant effect then progress to Stage 2	Included within the Integrated Impact Assessment Scoping Report. Concluded that the Local Plan is not likely to have significant effects on the qualifying features and integrity of the identified European sites. However, recommended that the Council should carry out a further screening assessment following the completion of the Issues and Options stage to identify whether the preferred approach is likely to have a significant effect on the identified European Sites.
Stage 2 – Appropriate Assessment (AA)	The Appropriate Assessment (AA) is a more detailed assessment which has been designed to determine whether or not the plan, either alone or in combination with other plans will have an	-
Stage 3 – Assessment of Alternative Solutions	The third stage examines alternative ways of achieving the aims of the project or plan which avoids adverse impacts on the integrity of the European Sites	-
Stage 4 – Assessment of Imperative Reasons of Overriding Public Interest (IROPI) and compensatory measures	If adverse impacts remain then the plan may only proceed where ‘imperative reasons of overriding interest’ (IROPI) are established and compensatory measures are taken.	-

Table 19: HRA process

3 Methodology for the Screening Assessment

3.1 There is no statutory or formal guidance on how to undertake a HRA. It should be noted that the following documents provide some guidance on the HRA:

- Assessment of plans and projects significantly affecting Natura 2000 sites – Methodological Guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC, European Commission
- Planning for the Protection of European Sites: Appropriate Assessment, Guidance for Regional Spatial Strategies and Local Development Documents, Department for Communities and Local Government, 2006

3.2 In addition to the above, the methodology for this assessment has drawn upon that used for the Appropriate Assessment of the Brent's Core Strategy (2010) and Development Management Policies (2016).

3.3 The methodology used for this assessment is detailed in the below table.

Stage	Tasks
Stage 1 – Screening for possible adverse effects	• Identification of European sites which could be impacted by the implementation of the Local Plan and its policies
Stage 2 – Appropriate Assessment of Likely Adverse Effects	• Identification of qualifying features, key environmental conditions to support integrity, and weaknesses and threats for the identified European Sites • Identification of key elements of the Local Plan and adverse environmental impacts arising from its implementation • Identification of trends and future developments which could lead to an 'in-combination' adverse effect on the identified European Sites • Analysis on how the implementation of the Local Plan alone and 'in-combination' is likely to affect the identified European Sites including identification of cross-cutting adverse impacts • Analysis of cross-cutting impacts with an assessment of how significant the impact of development in Brent is likely to be. • Screening of individual Local Plan policies for effects/impacts on European Sites

Table 20: Methodology used for HRA assessment

4. Relevant European Sites (Screening)

- 4.1 No European Sites lie wholly or partially within Brent. However, there are several European sites within and around London, which are considered to be in close enough proximity to be potentially affect by development in the borough. This assessment has identified five European Sites as shown in the table below, which are within 15km of the borough's boundaries, which could be impacted by the implementation of the Brent Local Plan.

European Site	Conservation Status	Site Size (ha)	Distance from Brent
Richmond Park	Special Area of Conservation	846.43	8km
Wimbledon Common	Special Area of Conservation	351.3831	9km
Lee Valley	Special Protection Area	451.2962	11km
South West London Water Bodies	Special Protection Area	828.14	15km
Epping Forest	Special Area of Conservation	1,796.92	15km

Table 21: Screened European Sites

Site Descriptions

- 4.2 Information on the five European Sites, including their qualifying features, current condition and threats have been obtained from the following sources:
- Natural England Site Improvement Plans and Designated Sites View
 - Natura 200 – Standard Data Forms
 - Habitats Regulation Assessment Screening of the Core Strategy DPD (2011) and Development Management Policies DPD (2016)
 - Draft Habitat Regulation Assessment for the emerging London Plan, GLA, 2017

Richmond Park

- 4.3 Richmond Park SAC is a parkland site which covers approximately 847ha. It has been managed as a royal deer park since the 17th century and continues to be managed as one of London's Royal Parks. The site has been identified as being significant due to its dry acid grassland and neutral unimproved grassland mosaic, extensive wooded areas and population of veteran trees. These habitats support a number of invertebrates and regionally uncommon plants, which includes Upright Chickweed (*Moenchia erecta*), Blinks (*Montia Fontana*) and Subterranean Clover (*Trifolium subterraneum*). Richmond Park is also at the heart of the south London centre of distribution for stag beetle *Lucanus cervus*, which is the qualifying species for this site.
- 4.4 Richmond Park is also designated as a National Nature Reserve (NNR) and a Site of Special Scientific Interest (SSSI).

Wimbledon Common

- 4.5 Wimbledon Common has a large number of old trees and fallen decaying timber. This site has been recognised as being important for the distribution of stag beetles *Lucanus cervus*, and similar to Richmond Park is at the heart of the south London centre of distribution for this species. The Common also supports examples of Northern Atlantic wet heaths and European dry heaths and has one of the few sphagnum bogs in the London area. Periodic mowing maintains wet and dry acid grassland and there are a number of valuable pond habitats formed by old gravel pits. The Common provides habitat for a variety of plants and animals typical of heathland and wetland. Nationally rare plant species present include the Liverwort, Veilwort (*Pallavicina lyelli*). The dry grassland supports the nationally scarce Yellow Vetchling (*Lathyrus aphaca*) and Spring Vetch (*Vicia lathyroides*). The habitats at this site also support a number of birds including the Skylark and Bullfinch, and invertebrates including butterflies and dragonflies/damselflies.
- 4.6 Wimbledon Common is also designated as a Site of Special Scientific Interest (SSSI)

Lee Valley

- 4.7 The Lee Valley SPA contains a series of embanked water supply reservoirs, sewage treatment lagoons and former gravel pits that display a range of man-made and semi-natural wetland and valley bottom habitats. Wintering populations of Bittern (*Botaurus stellaris*), Shoveler (*Anas clypeata*) and Gadwall (*Anas strepera*) visit the area as well as breeding birds which include the Kingfisher (*Alcedo atthis*), Little Ringed Plover (*Charadrius dubius*), Skylark (*Alauda arvensis*) and Yellow Wagtails. The SPA also supports nationally and regionally important numbers of Tufted Duck (*Aythya Fuligula*), Great Crested Grebe (*Podiceps cristatus*), Goosander (*Mergus merganser*) and Goldeneye (*Bucephala clangula*). There are a number of rare aquatic invertebrate present such a waterboatman, as well as many regional uncommon and rare wetland

plant species including River Water-drop-wort (*Oenanthe fluviatilis*), Tubular water-dropwort (*Oenanthe fistulosa*), Whorl-grass (*Catabrosa aquatic*), Arrowhead (*Sagittaria sagittifolia*), Flowering-rush (*Butomus umbellatus*) and Stream water-crowfoot (*Ranunculus penicillatus*). The Lee Valley supports a number of specially protected species including the Water Vole and Great Crested Newt. The area is also very popular for recreational activities and is designated a Regional Park. The Lee Valley Park Authority is responsible for managing the important balance between nature conservation and recreational activity on the site.

South West London Water Bodies (SWLWB)

4.8 South West London Water Bodies (SWLWB) comprises several gravel pits and reservoirs scattered around Staines in Greater London. The site is an important habitat for hundreds of migratory wintering Gadwall and Shoveler, which spend their winter on and around these bodies. The numbers at this site are significant on a European Level. The waterbodies are also of national important to a number of wintering wildfowl, namely Vormorant (*Phalacrocorax carbo*), Great Crested Grebe (*Podiceps cristatus*), Tufted Duck (*Aythya fuligula*), Pochard (*Aythya farina*), and Coot (*Fulica atra*).

4.9 Seven of the reservoirs on the site are designated as SSSIs.

Epping Forest

4.10 Epping Forest is an extensive ancient wood-pasture with habitats of high nature conservation value including ancient semi-natural woodland, old grassland plains, wet and dry heathlands and scattered wetland. The semi-natural woodland is particularly extensive but the forest plains are also a major feature and contain a variety of unimproved acid grasslands. Epping Forest represents Atlantic acidophilous beech forests in the north-eastern habitats of the UK's range. The site is also to important range of rare ephiphyttes, including the moss *Zygodon forsteri*. The woodland supports many bird species, including breeding Sparrow Hawk, Marsh Tit and Hawfinch. There have been widespread, and frequent records of stag beetle *Lucanus cervus* on this site.

4.11 The below table provides a summary of the qualifying features, conservation objectives, site sensitivities and threats of the identified European sites.

Site	Qualifying Features	Conservation Objectives	Current Condition	Site Sensitivities	Threats/Pressures
Richmond Park SAC	<i>Lucanus cervus</i> : Stag Beetle	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintain or restoring: • The extent and distribution of the habitats of qualifying species • The structure and function of the habitats of qualifying species • The supporting processes on which the habitats of qualifying species rely • The populations of qualifying species, and • The distribution of qualifying species within the site.	100% of this site is an 'Unfavourable – Recovering' equivalent to 846.63 hectares	• Scrub encroachment • Development pressure • Human Disturbance • Atmospheric Pollution	• No threats or pressures identified within the Natural England Site Improvement Plan. Increased recreational pressure and urbanisation
Wimbledon Common	Northern Atlantic wet heaths with <i>Erica tetralix</i>	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its	333.77ha of the site is 'Unfavourable – Recovering' condition. This is equivalent to 94.99% of the site.	• Heavy recreational pressure • Spread of non-native/invasive species	• Public Access/Disturbance • Habitat Fragmentation

Site	Qualifying Features	Conservation Objectives	Current Condition	Site Sensitivities	Threats/Pressures
Page 1375	European dry heaths <i>Lucanus cervus</i>: Stag beetles The site qualifies as an SAC for the following Annex II species: - Stag Beetles <i>Lucanus cervus</i>	Qualifying Features, by maintaining or restoring; • The extent and distribution of qualifying natural habitats of qualifying species • The structure and function (including typical species) of qualifying natural habitats • The structure and functions of habitats of qualifying species • The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely • The population of qualifying species, and, • The distribution of qualifying species within the site	17.62 ha of the site is in 'Unfavourable – No Change' condition. This is equivalent to 5.01% of the site.	• Scrub encroachment • Atmospheric pollution	• Invasive Species • Air Pollution: impact of atmospheric nitrogen deposition
	Lee Valley SPA <i>Botaurus stellaris</i>; Great Bittern	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild	<u>Amwell Quarry SSSI</u> • 100% of site (37.08ha) in favourable condition <u>Rye Meads SSSI</u>	• Water quality • Water levels • Disturbance to bird feeding and	• Water Pollution • Hydrological Changes

Site	Qualifying Features	Conservation Objectives	Current Condition	Site Sensitivities	Threats/Pressures
Page 1376	<i>Anas strepera</i> ; Gadwall	Birds Directive, by maintaining or restoring; - The extent and distribution of the habitats of the qualifying features - The structure and function of the habitats of the qualifying features - The supporting processes on which the habitats of the qualifying features rely - The population of each of the qualifying features, and, - The distribution of the qualifying features within the site.	39.95% of the site (24.08ha) is in 'favourable' condition, 60.05% (24.08ha) is in 'unfavourable – recovering' condition.	roosting habitats (noise/visual)	- Public Access/Disturbance - Inappropriate scrub control - Fisheries: Fish stocking - Invasive Species - Inappropriate cutting/mowing - Air Pollution: risk of atmospheric nitrogen deposition
	<i>Anas clypeata</i> ; Northern Shoveler		<u>Turnford and Cheshunt Pits SSSI</u> 100% (174.41 ha) of the site is in 'favourable' condition <u>Walthamstow Reservoirs SSSI</u> 100% (179.51ha) of the site is in 'Unfavourable – Recovering' condition.		
South West London Water Bodies	<i>Anas clypeata</i> : Northern Shoveler <i>Anas strepera</i> : Gadwall	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;	<u>Kempton Park Reservoirs SSSI</u> 100% (25.29%) of the site is within 'Unfavourable – Recovering' condition.	Water Quality – eutrophication is a threat, particularly from point source pollution but also from surface run-off or groundwater pollution and	- Public Access/Disturbance - Changes in species distributions - Invasive Species

Site	Qualifying Features	Conservation Objectives	Current Condition	Site Sensitivities	Threats/Pressures
Page 1377		- The extent and distribution of the habitats of the qualifying features - The structure and function of the habitats of the qualifying features - The supporting processes on which the habitats of the qualifying features rely - The population of each of the qualifying features, and - The distribution of the qualifying features within the site	<u>Knight and Bessborough Reservoirs SSSI</u> 100% (63.43ha) of the site is in 'Favourable' condition <u>Staines Moor SSSI</u> 96.16% (491.18ha) of the site is in 'Favourable' condition. 2.13% (10.90ha) of the site in 'Unfavourable – Recovering' condition. <u>Thorpe Park No. 1 Gravel Pit (SSS)</u> 100% (42.53ha) of the site in 'Favourable' condition <u>Wraysbury and Hythe End Gravel Pits SSSI</u> 100% (117.21ha) 'Favourable' condition <u>Wraysbury No. 1 Gravel Pit SSSI</u> 100% (57.96ha) in 'Favourable' condition	atmospheric deposition. - Water levels - Disturbance to bird feeding and roosting habitats (noise/visual) - Siltation - Scrub or tree encroachment - Spread of introduced non-native species - Recreational pressure/disturbance - Development pressure - Diffuse air pollution from traffic and agriculture	- Natural changes to the site conditions - Fisheries: Fish stocking - Inappropriate weed control - Invasive Species - Inappropriate cutting/mowing - Air pollution: risk of atmospheric nitrogen deposition.

Site	Qualifying Features	Conservation Objectives	Current Condition	Site Sensitivities	Threats/Pressures
			<u>Wraysbury Reservoir SSSI</u> 100% (205.56ha) in 'Favourable' condition.		
Epping Forest	Northern Atlantic wet heaths with <i>Erica tetralix</i> Atlantic acidophilous beech forests with Ilex and sometimes also <i>Taxus</i> in the shrub layer <i>Lucanus cervus</i>: Stag Beetle European dry heaths	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; - The extent and distribution of qualifying natural habitats and habitats of qualifying species - The structure and function (including typical species) of qualifying natural habitats - The structure and function of habitats of qualifying species - The supporting processes on which qualifying natural habitats and habitats of qualifying species rely - The populations of qualifying species, and,	35.48% (643.31ha) of the site is in 'Favourable' condition. 48.17% (861.19ha) of the site is in 'Unfavourable – Recovering' condition. 14.53% (259.76ha) of the site is in 'Unfavourable – no change' condition. 1.83% (32.66ha) of the site is in 'Unfavourable – Declining' condition.	- Heavy recreational pressure - Scrub encroachment - Atmospheric pollution (nutrient deposition and acidification) - Development pressure	- Air Pollution: impact of atmospheric nitrogen deposition - Under grazing - Public Access/Disturbance - Changes in species distributions - Inappropriate water levels - Water Pollution - Invasive Species to Wet Heathland with cross-leaved heath and Beech Forest on acid soils - Disease

Site	Qualifying Features	Conservation Objectives	Current Condition	Site Sensitivities	Threats/Pressures
		The distribution of qualifying species within the site.			

Table 22: Qualifying features, conservation objectives, site sensitivities and threats of identified European sites

5. The Brent Local Plan

5.1 The emerging Local Plan will contain a number of strategic and non-strategic policies that will form the development strategy of the borough to 2041. These policies will seek to address a number of issues, which include:

- Providing 2325 dwellings a year to 2029 to accord with Policy H1 of the new draft London Plan. Furthermore, the Brent Strategic Housing Market Assessment 2018 has identified a need for 42,000 homes between 2016-2041, which is equivalent to 1,680 dwellings;
- Supporting high population growth within the borough – it is predicted that the population of Brent will grow by 23.7% by 2050, from approximately 329,000 in 2016 to 407,000 in 2050;
- The emerging London Plan has identified Brent as a ‘provide capacity’ borough, which means that it needs to provide additional employment floorspace within the borough. There is also the desire for Brent to move to a higher wage economy to assist in tackling inequalities within the borough;
- Protecting and enhancing the borough’s open space, while seek to create new provision on major sites and within the identified growth areas;
- Addressing the impacts of climate change, such as the urban heat island effect and increased flood risk;
- Achieving the London Plan target of zero-carbon major development;
- Improving local air quality within the borough through ensuring all major development is air quality neutral, and where possible, air quality positive;
- Provision of adequate infrastructure to support both existing and new residents, businesses and visitors;
- Promoting sustainable and active travel within the borough to address the issue of road congestion; and
- Maintaining the vitality and viability of the borough’s town centres

5.2 In carrying out a HRA it is important to identify the various ways in which land use plans can have an impact on internationally designated sites. This is done through following the impact pathways which can connect development within internationally designated sites. The following possible impact pathways have been identified for the Brent Local Plan:

- *Urbanisation - Increased urbanisation could entail greater noise, light, and air pollution. This could have an impact on migrating birds. Greater urbanisation could also lead to degradation in water quality.*
- *Recreational Pressure – Population growth within the borough could lead to increased visit to European sites with associated disturbance to flora and fauna impacts on supporting habitats due to recreational activities.*
- *Water Quality – Increased water use, depending on the source of the water and where it deposited could affect water levels and quality within the European sites.*
- *Atmospheric Pollution – Increased traffic as a result of the commercial and housing development within the borough could lead to an increase in air pollution. Furthermore, the population increase could result in additional cars on the borough's road network, which could lead to further emissions. This increase in air pollution could affect sensitive species.*

6. HRA Screening of Policies within the preferred option of the Brent Local Plan

6.1 Table 25 presents the screening assessment from for the policies contained within the 'Brent Local Plan'.

Policy Number	HRA screening
BP1 – Central	This policy sets out the development strategy for central Brent. Key elements of this policy include: provide at least an additional 15,000 new dwellings within the central area, intensify employment uses and providing additional retail floorspace. It is possible that the increase in population as a result of residential development within this area could lead to an increase in recreational visits at the identified European Sites. However, it is considered that this policy will have a very limited impact on the identified European sites due to their distance from the borough and that Brent has a number of open spaces which can be visited.
BCGA1 – Wembley Growth Area Page 1381	This policy sets out the development strategy for the Wembley Growth Area. Key elements of this policy include: development of 15,000 new homes, ensuring physical pedestrian and cycle route linkages from Wembley Triangle to Forty Lane / Bridge Road, and creation of recreational space. It is possible that the increase in population as a result of residential development within this growth area could lead to an increase in recreational visits at the identified European Sites. However, it is considered that this policy will have a very limited impact on the identified European sites due to their distance from the borough and that Brent has a number of open spaces which can be visited.
BP2 – East	This policy sets out the development strategy for East Brent. Key elements of this policy include: providing additional housing within two new Growth Area – Neasden Station and Staples Corner; encouraging intensification on local significant industrial sites and Staples Corner. It is possible that the increase in population as a result of residential development within this area could lead to an increase in recreational visits at the identified European Sites. However, it is considered that this policy will have a very limited impact on the identified European sites due to their distance from the borough and that Brent has a number of open spaces which can be visited.
BP3 – North	This policy sets out the development strategy for North Brent. Key elements of this policy include: providing additional housing within the extended Burnt Oak and Colindale Growth Area; redevelopment of the Morrison's site to maximise efficiency; co-location at Honeypot LSIS; supporting transformational change at Colindale LSIS; and reducing traffic dominance along the

Policy Number	HRA screening
	A5 corridor. This policy seeks to provide additional housing within the extended Burnt Oak and Colindale Growth Area, co-location at Honeypot LSIS, supporting transformational change at
BNGA1 – Burnt Oak / Colindale Growth Area	This policy sets out the development strategy for the Burnt Oak / Colindale Growth Area. Key elements of the policy include: delivery of 2000 new homes, improvements to the quality and accessibility of existing local open spaces, play areas within new developments, and improved cycle infrastructure along the A5. It is possible that the increase in population as a result of residential development within this growth area could lead to an increase in recreational visits at the identified European Sites. However, it is considered that this policy will have a very limited impact on the identified European sites due to their distance from the borough and that Brent has a number of open spaces which can be visited.
BP4 – North West Page 1382	This policy sets out the development strategy for North West Brent. Key elements of this policy are: the provision of an additional 2,600 new homes at the newly established Northwick Park Growth Area; encouraging intensification at East Lane Businesses Park. It is possible that the increase in population as a result of residential development within this area could lead to an increase in recreational visits at the identified European Sites. However, it is considered that this policy will have a very limited impact on the identified European sites due to their distance from the borough and that Brent has a number of open spaces which can be visited.
BP5 – South	This policy sets out the development strategy for South Brent. Key elements of this policy are: delivering additional homes within the extended Church End Growth Area; co-locating employment and residential at Church End LSIS; encouraging intensification at Brentfield LSIS; reducing flood risk at Brent River Park; and creating strong walking and cycling links with the surrounding areas. It is possible that the increase in population as a result of residential development within this area could lead to an increase in recreational visits at the identified European Sites. However, it is considered that this policy will have a very limited impact on the identified European sites due to their distance from the borough and that Brent has a number of open spaces which can be visited.
BSGA1 – Church End Growth Area	This policy sets out the development strategy for the Church End Growth Area. Key elements of this policy include: delivery of 1040 homes, new space to serve as an employment, community and health hub, and a new 6 form of entry secondary school and college. It is possible that the increase in population as a result of residential development within this growth area could lead to an increase in recreational visits at the identified European Sites. However, it is considered that

Policy Number	HRA screening
	this policy will have a very limited impact on the identified European sites due to their distance from the borough and that Brent has a number of open spaces which can be visited.
BP6 South East	This policy sets out the development strategy for the South East Brent. Key elements of this policy include: delivering 2,800 new homes within the South Kilburn Growth Area; redevelopment of Kilburn Square; creating new open space within the South Kilburn Growth Area; and reducing traffic dominance along the A5 corridor. It is possible that the increase in population as a result of residential development within this area could lead to an increase in recreational visits at the identified European Sites. However, it is considered that this policy will have a very limited impact on the identified European sites due to their distance from the borough and that Brent has a number of open spaces which can be visited.
BSEGA1 – South Kilburn Growth Area	This policy sets out the development strategy for the South Kilburn Growth Area. Key elements of this policy include: delivery of approximately 3400 new homes, provision of a new health centre, and additional public open space. It is possible that the increase in population as a result of residential development within this growth area could lead to an increase in recreational visits at the identified European Sites. However, it is considered that this policy will have a very limited impact on the identified European sites due to their distance from the borough and that Brent has a number of open spaces which can be visited.
BP7 – South West	This policy sets out the development strategy for South West Brent. Key elements of this policy include: continuing residential-led mixed-use development within Wembley and Alperton Growth Areas; encouraging the intensification of existing SIL and LSIS around Alperton; enhancing and maintaining Barham Park; reducing car parking standards within the Alperton Housing Zone. It is possible that the increase in population as a result of residential development within this area could lead to an increase in recreational visits at the identified European Sites. However, it is considered that this policy will have a very limited impact on the identified European sites due to their distance from the borough and that Brent has a number of open spaces which can be visited.
BSWGA1 – Alperton Growth Area	This policy sets out the development strategy for the Alperton Growth Area. Key elements of this policy include: over 6000 additional homes and new business and employment floorspace, such including studios and managed workspaces for local businesses, creative industries, and artists to reinvigorate the local economy. It is possible that the increase in population as a result of

Policy Number	HRA screening
	residential development within this growth area could lead to an increase in recreational visits at the identified European Sites. However, it is considered that this policy will have a very limited impact on the identified European sites due to their distance from the borough and that Brent has a number of open spaces which can be visited.
BD1 – Leading the way in Good Urban Design	It is considered that this policy will have no HRA implications. This is a development management policy which sets out the standards that need to be achieved in relation to good urban design and architectural quality.
BD2 – Tall Buildings in Brent	It is considered that this policy will have no HRA implications. This is a development management policy that sets out the standards that need to be achieved in relation to tall buildings.
BD3 – Basement Development	It is considered that this policy will have no HRA implications. This is a development management policy which sets the standards for basement development within Brent.
BH1 – Increasing Housing Supply in Brent	This policy sets out how housing supply within Brent will be increased to provide additional homes to 2041. It is possible that the increase in population, which is supported by the increase in the borough's housing supply, could lead to an increase in recreational visits to the identified European sites. However, due to the borough's distance from the European Sites, it is considered that this policy will have a very limited impact.
BH2 – Priority Areas for Additional Housing Provision within Brent	It is considered that this policy will have no HRA implications. This policy identifies priority areas where the provision of additional homes will be supported.
BH3 – Build to Rent	It is considered that this policy will have no HRA implications. This is a development management policy that sets the requirement for Build to Rent properties to be provided on sites that provide 500 dwellings or more, unless certain criteria is met.
BH4 – Small Sites and Small Housing Developments in Brent	As identified within the emerging London Plan, small housing sites and small housing developments are to form a significant portion of the borough's housing supply. It is possible that the increase in population, which will be supported by achieving the small sites target, can lead to an increase in recreational visits to the identified European site. However, due to the borough's distance from the European Sites, it is considered that this policy will have a very limited impact.

Policy Number	HRA screening
BH5 – Affordable Housing	It is considered that this policy will have no HRA implications. This is a development management policy that sets out the affordable housing tenure split required to comply with the fast track approach for viability for residential developments of 10 or more dwellings.
BH6 – Housing Size Mix	It is considered that this policy will have no HRA implications. This is a development management policy that sets out the Council's preferred housing mix for residential developments within the borough.
BH7 – Accommodation with Shared Facilities for Additional Support	It is considered that this policy will have no HRA implications. This is a development management policy that sets out the criteria – both for their creation and for their loss – of accommodation with shared facilities or additional support.
BH8 – Specialist Older Persons Housing	It is considered that this policy will have no HRA implications. This is a development management policy that seeks to ensure sufficient provision of specialist older persons housing in the borough, which will support achieving the London Plan annual benchmark of 230 dwellings per annum.
BH9 – Gypsy and Traveller Accommodation	It is considered that this policy will have no HRA implications. This is a development management policy that seeks to ensure
BH10 – Resisting Housing Loss	It is considered that this policy will have no HRA implications. This is a development management policy that sets out the exceptional circumstances that must be met for the Council to support the loss
BH11 – Conversion of Family Sized Dwellings	It is considered that this policy will have no HRA implications. This is a development management policy that sets out to protect family size housing within the borough.
BH12 – Residential Outbuildings	It is considered that this policy will have no HRA implications. This is a development management policy that seeks to ensure that new out buildings do not provide residential accommodation, or do not support increased occupation of a dwelling.
BH13 – Residential Amenity Space	It is considered that this policy will have no HRA implications. This is a development management policy that sets out the residential amenity space standards that are to be met by developments within the borough.
BSI1 – Social Infrastructure and Community Facilities	It is considered that this policy will have no HRA implications. This policy seeks to protect existing social infrastructure within the borough, and sets out the requirements for new or enhanced social infrastructure facilities.

Policy Number	HRA screening
Policy BE1 – Economic Growth and Employment Opportunities for all	It is considered that this policy will have no HRA implications. This policy seeks the protection of educational quarters at Northwick Park and Wembley and a minimum of 10% of new employment space on major developments in Alpertown, Burnt Oak Colindale, Church End, Neasden, Staples Corner and Wembley Growth Areas exceeding 3,000 sqm to be affordable workspace in the B use class. The quantum of employment space delivered as a result of implementing this policy is not considered to have a detrimental impact on the identified European sites.
Policy BE2 – Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS)	It is considered that this policy will have no HRA implications. This policy seeks to intensify industrial uses within particular locations within the borough. No quantum of development has been identified within this policy. However, intensification of employment sites is likely to result in the creation of additional jobs within the borough. This could lead to additional recreational demand from workers. Due to the location of SIL and LSIS within the borough, it is considered that any impacts of the identified European sites will be very limited.
Policy BE3 – Local Employment Sites and Work-Live	It is considered that this policy will have no HRA implications. This is a development management policy that seeks to protect local employment sites from being inappropriately released for non-employment uses.
Policy BE4 – Supporting Strong Centres	It is considered that this policy will have no HRA implications. This policy seeks to ensure that the town centres within the borough are strengthened, and are not detrimentally impacted by retail development outside of town centre boundaries.
Policy BE5 – Protecting Retail in Town Centres, Betting Shops, Adult Gaming Centres and Pawnbrokers	It is considered that this policy will have no HRA implications. This is a development management policy that seeks to restrict the amount of betting shops, adult gaming centres and pawnbrokers within the borough's town centres. It also sets out the conditions for the introduction of new takeaways and shisha cafes within the borough.
Policy BE6 – Neighbourhood Parades and Isolated Shop Units	It is considered that this policy will have no HRA implications. This is a development management policy that seek to protect retail and services uses within Neighbourhood Parades.
Policy BE7 – Shop Front Design and Forecourt Trading	It is considered that this policy will have no HRA implications. This is a development management policy that requires shop front design and forecourt to be of high quality that complements the building and adjoining properties.

Policy Number	HRA screening
Policy BE8 – Markets and Car Boot Sales	It is considered that this policy will have no HRA implications. This is a development management policy that seeks to protect markets within the borough, and requires planning permission for new markets and car boot sales to be subject to an agreed Management Plan.
Policy BE9 – Visitor Accommodation and Attractions	It is considered that this policy will have no HRA implications. This is a development management policy that identifies the priority locations for hotel provision within the borough, and sets out the criteria that is to be met, in addition to the sequential test for hotels in town centres.
Policy BHC1 – Brent’s Heritage Assets	It is considered that this policy will have no HRA implications. This is a development management policy that seeks to protect the borough’s heritage assets, and details how the Council will assess the impact that development may on these assets.
Policy BHC2 – National Stadium Wembley	It is considered that this policy will have no HRA implications. This is a development management policy that seeks to protect the National Stadium Wembley, and its functions as a renowned location for sport and cultural events from inappropriate development.
Policy BHC3 – Supporting Brent’s Culture and Creative Industries	It is considered that this policy will have no HRA implications. This is a development management policy that seeks to ensure that creative industries are supported through the development of improved and additional creative workspaces, cultural facilities and other mutually complementary uses.
Policy BHC4 – Brent’s Night Time Economy	It is considered that this policy will have no HRA implications. This is a development management policy that seeks to ensure that Brent’s night time economy (in particular the centres of Kilburn High Road, Cricklewood, Wembley Park and Wembley) are the priority locations for such uses.
Policy BHC5 – Public Houses	It is considered that this policy will have no HRA implications. This is a development management policy that seeks to ensure that the loss of public houses will only be supported in certain circumstances.
Policy BG11 – Green and Blue Infrastructure in Brent	It is considered that this policy will have no HRA implications. This is a development management policy that seeks to protect and enhance the borough’s green and blue infrastructure, biodiversity and geo-diversity. Furthermore, it places a requirement on major developments to incorporate publically accessible open space. It is possible that through the enhancement of the borough’s open spaces, biodiversity and geo-diversity, and the provision of new spaces, residents may not feel the need to travel to the European sites.

Policy Number	HRA screening
Policy BGI2 - Trees and Woodlands	It is considered that this policy will have no HRA implications. This is a development management policy that seeks to protect the borough's existing tree stock.
Policy BSUI1 – Creating a Resilient and Efficient Brent	This policy seeks to: establish new district Combined Heat and Power networks at new Growth Areas within the borough; requires new development within specific growth areas to connect or contribute towards a decentralised energy system; requires all major development to submit a sustainability statement and all major non-residential development to achieve BREEAM standard of 'Excellent'. It is considered that this policy will have no HRA implications. This is a development management policy that seeks to improve the efficiency of Brent, and its resilience against the impacts of climate change
Policy BSUI2 - Air Quality	It is considered that this policy will have no HRA implications. This policy seeks to improve local air quality through requiring all major developments to achieve at least Air Quality Neutral with developments in Growth Areas and Air Quality Focus Areas to achieve Air Quality Positive. Improving air quality within Brent can lead to a reduction in emissions, such as carbon dioxide and nitrogen oxides, which in conjunction with the implementation of the policies and proposals contained within the Mayor's Environment Strategy and the draft London Plan, could have a positive impact on the atmospheric pollution levels at the identified European Sites.
Policy BSUI3 – Managing Flood Risk	It is considered that this policy will have no HRA implications. This is a development management policy that seeks to minimise flood risk within the borough.
BSUI4 – On Site Water Management and Surface Water Attenuation	It is considered that this policy will have no HRA implications. This is a development management policy that seeks to ensure development does not impact on the current drainage system, and that appropriate sustainable drainage measures are in place to control surface water-run off. As demonstrated in the IIA matrices for BSUI4, the implementation of this policy can protect the quality and/or enhance the quality of water within the borough.
BT1 – Sustainable Travel Choice	It is considered that this policy will have no HRA implications. This policy seeks to promote active travel and sustainable travel within the borough. The promotion of such methods could lead to a decrease in congestion, and the amount of emissions that transport emit into the atmosphere. In conjunction with the implementation of the Mayor's Environment Strategy and the draft London Plan, this could have a positive impact on the atmospheric pollution levels at the identified European Sites.

Policy Number	HRA screening
BT2 – Parking and Car Free Development	It is considered that this policy will have no HRA implications. This is a development management policy that sets out the car parking standards for development within the borough, and details how the impact of parking will be managed.
BT3 – Freight and Servicing	It is considered that this policy will have no HRA implications. This policy encourages freight delivery to adopt more sustainable modes of travel and sets the standards for the provision of serving facilities within all development. The promotion of such methods could lead to a decrease in congestion, and the amount of emissions that transport emit into the atmosphere. In conjunction with the implementation of the Mayor's Environment Strategy and the draft London Plan, this could have a positive impact on the atmospheric pollution levels at the identified European Sites.
BT4 – Forming an access on to a road	It is considered that this policy will have no HRA implications. This is a development management policy that sets out the conditions that are to be met for the creation of an access to a highway.

Table 23: Screening assessment for the policies contained within the Brent Local Plan

7. Pathways of Impact

7.1 It is considered that there are three ways in which the implementation of the Brent Local Plan can impact the European Sites. These impacts are discussed in more detail below.

Urbanisation and Recreational Pressure

7.2 The identified European sites have a range of habitats and have proven to be a popular recreational resource. As identified in Table 4, the conservation value of 4 out of the 5 sites are at risk from recreational pressure. The recreational use of a European site can have the potential to cause the following:

- Disturbance to sensitive species
- Cause damage through mechanical/abrasive damage and nutrient enrichment i.e. trampling, dog fouling, off-road vehicle use.
- Prohibit appropriate management or exacerbate existing management difficulties/issues

7.3 Different European Sites are subject to different recreational pressures. For example, as highlight in Natural England's Site Improvement Plan for Epping Forest, the site is subject to high recreational pressure, with it having a high level of footfall throughout the year, which results in a diverse range of impacts which include mountain biking and unmanaged fires. The JNCC has identified that recreational and urban distance at lowland heathland, such as that found at Wimbledon Common, can lead to excessive disturbance to wildlife, pollution through dog-fouling and littering, and damage through trampling and erosion.

7.4 In addition to the impacts identified above for recreational pressure, urbanisation can also have the following impacts on European sites:

- Fly tipping
- Increased predation due to domestic cats
- Light pollution and Noise Pollution
- Disturbance as a result of construction activities

Effects of the Brent Local Plan on the identified European Sites

7.5 The Brent Local Plan includes policies that seek to accommodate significant housing growth – which includes achieving the 2325 dwellings per annum to 2028/29 – and employment growth. Such significant growth could possibly lead to increased visits from Brent residents and workers to the identified European sites.

- 7.6 Although the European Sites identified above provide a number of recreational activities, it is considered unlikely that Brent residents and workers will visit the identified sites on a frequent basis due to the following reasons:
- None of the sites are adjacent to Brent or within north-west London, with all sites being over half an hour drive from the centre of the borough
 - There are a number of open spaces within the borough, such as Fryent County Park and Welsh Harp, which can be accessed easier for Brent residents and workers than the European Sites. In line with London Plan policy and emerging Brent Local Plan policy, these open spaces will continue to be protected, and where possible, enhanced. Furthermore, there are several major green spaces in neighbouring boroughs, such as Hyde Park, Regents Park, Horsenden Hill and Hampstead Heath, that Brent residents and workers can easily access.
 - Some of the recreational activities offered at the European sites can be accessed within the borough and/or neighbouring boroughs. For example, both Lee Valley Regional Park and SWWLWB are popular sites for angling and water sports. However, Welsh Harp offers water-based activities within North West London which are comparable to those at Lee Valley and SWLWB.
- 7.7 Furthermore, the threats of recreational pressure and urbanisation at the identified European Sites are addressed and mitigated through local management plans. For example, the Richmond Park Management Strategy seeks to ensure the intensity of any particular recreation activities does not conflict with the landscape or ecological qualities of the park and the Lee Valley Regional Park Authority prepared a 'Water Management Strategy' in the late 1990s which sets out an approach to how competing demands of recreation and biodiversity will be met, and has continued to influence policies and proposals that come forward within the Regional Park.

Water Quality and Water Levels

- 7.8 Lee Valley Spa and SWLWB are the only two European sites which have been identified as being sensitive to water quality and vulnerable to changes in water levels.
- 7.9 Poor water quality can have a number of impacts on the identified European sites, which includes:
- Eutrophication – the over enrichment of water nutrients. This can lead to hypoxia (oxygen depletion) and harmful algal blooms which can destroy the aquatic life of the affected area.⁴⁰
 - Detrimental impact on the landscape in regards to smell and aesthetics.

⁴⁰ World Resources Institute: <http://www.wri.org/our-work/project/eutrophication-and-hypoxia/about-eutrophication>

- Microbial pollutants (i.e. those from sewerage) could lead to infectious diseases which could ingest the aquatic life and terrestrial life through drinking water.
- Reduced amounts of sunlight penetrating the water as a result of suspended particles. This could disrupt the growth of photosynthetic plants and micro-organisms, which would impact on the aquatic community that they support.

7.10 Diffuse source pollution is primarily managed locally through waste water treatment. The Brent Local Plan draft policy BSUI4 seeks to ensure that developments have sufficient on-site water attenuation methods.

7.11 Water scarcity and water quality levels is a London-wide issue, with all water companies that serve London being located in areas that are classified as 'seriously water-stressed'. Housing growth and the increasing number of 1 person households have led to an increasing domestic demand for water. As identified in the draft London Plan, Londoners consumer on average 149 litres of water per day – which is 8 litres above the national average. With the predicted population growth, it is likely that the abstraction rate will increase to support the growing population, which will have a detrimental impact on water levels.

The Effects of the Brent Local Plan

Water Levels

7.12 Like a number of authorities within London, Brent draws it water from the wider Thames River Basin – an area encompassing the River Thames, its tributaries and groundwater supply. In regards to water scarcity, in line with Policy SI5 of the draft London Plan, all major development proposals within Brent are to achieve mains water consumptions of 105litres or less per head per day. The implementation of the London Plan policy within Brent, and across all London boroughs, should assist in addressing the issue of water scarcity and maintaining water levels.

7.13 Furthermore, it should be noted that the draft London Plan HRA found that due to significant investment that Thames Water has placed in its water supply infrastructure to make it as resilient as possible, and no intention to use the top level of any of the reservoirs in the South West London Water Bodies (as indicated in the draft Thames Water Resource Management Plan 201-2040), there is not likely to be a significant effect on the European sites through this impact pathway.

Water Quality

7.14 As identified above, poor water quality is likely to have a significant effect on the Lee Valley Spa and SWLWB. However, it is considered that the implementation of the plans and proposals within the Brent Local Plan will not have an impact on water quality within the two aforementioned sites for the following reasons:

- The Brent Local Plan (Policy BGI1) requires development in the vicinity of the borough's blue ribbon network enhance water quality and biodiversity in accordance with the objectives of the Water Framework Directive and Thames River Basin Water Management Plan
- The Brent Local Plan (BSUI4) requires all major development proposals, and where feasible, minor developments to incorporate sustainable drainage measures. The inclusion of such measures on scheme can help protect water quality within the borough through ensuring through reducing sediment and contaminants from runoff.

Air Quality

7.15 The three main pollutants of concern to the identified European Sites are:

- Sulphur Dioxide (SO₂) – the output of these emissions is from power stations and industrial processes that require the combustion of coal and oil
- Ammonia (NH₃) – the output of these emissions is dominated by agricultural processes, with some chemical processes.
- Oxides of Nitrogen -- the output of this pollutant is dominated by vehicle exhausts

7.16 Epping Forest is particularly vulnerable to air pollution, with the decline in epiphytes in the area largely attributed to air pollution. The major contributor of air pollution in this area is vehicle emissions.

7.17 Air quality is a London-wide problem, with a number of national targets for nitrogen dioxide, ozone and particulate matters levels being exceeded. A regional response to improving air quality has been created, and is incorporated within a number of documents, which includes the Mayor's Environment Strategy and the Mayor's Transport Strategy.

The effects of the Brent Local Plan

7.18 In order to address poor air quality within the borough, the Council has prepared an Air Quality Action Plan (2017-2022). This plan details that actions that the Council will undertake over the next five years and how the Council will act to reduce the pollution from transport, construction and local industry. The Brent Local Plan supports the aims of the Brent Air Quality Action Plan, and seeks to ensure that all major development is at least air quality neutral, with development in Growth Areas and Air Quality Focus areas being air quality positive.

7.19 The implementation of Brent's Air Quality Action Plan, in conjunction with the London-wide initiatives, may see improvements in air quality. Such improvements is likely to have positive impacts on the identified European Sites.

8. Possible in-combination effects

- 8.1 There is a requirement to consider the 'in-combinations' effects of the Brent Local Plan. To assist in establishing whether there is likely to be 'in-combination effects', this section of the HRA details existing and/or future regional trends and developments within neighbouring boroughs.
- 8.2 The emerging London Plan, the emerging Integrated Impact Assessment and Mayor's Strategies identified a number of issues within the London region which are likely to have detrimental environmental impacts if not addressed. In addition, trends relating to climate change are also likely to have significant impacts for biodiversity, which could affect the integrity of European sites. Relevant London trends include:
- London has seen significant population growth, with current population projections estimating that the population of the city will increase by 70,000 a year, reaching 10.8 million in 2041.
 - It is likely that the intensification of development within London to accommodate the growing population will lead to an increase in the urban heat island (UHI) effect and further increase the risk of overheating.
 - London's streets are some of the most congested in the world. Lifestyle changes, increased use of internet deliveries, Sunday shopping and the rapidly growing night-time economy has caused changes in travel and congestion patterns in recent years.
 - Employment is expected to increase on average by 49,000 jobs each year, reaching 6.9 million by 2041.
 - Approximately 800,000 people commute into London for work. This is anticipated to increase to 1 million by 2041.
 - It is anticipated that there will be a significant increase in the amount of trips made by Londoners; from 20 million to 25 million per day between 2011 and 2041.
 - London's air quality is poor. There are high levels of NO_x, PM₁₀, PM_{2.5} emissions from road transport, with it predicted that there will be little or no reduction in PM₁₀ and PM_{2.5} between 2013-2030 from this source. London is also not compliant with legal limit values for NO₂. Furthermore, CO₂ emissions from buildings continue to rise.
 - London will always have some degree of flood risk. However, with climate change the probability of flooding is increasing. Furthermore, London is also at particular risk from surface water flooding, which is mainly due to its large extent of impermeable surfaces.
 - In addition to increased risk of flooding, current and anticipated effects of climate change in London are: hotter summer, more intense rainfall, more frequent and intense heatwaves, changes in seasonality of rainfall, increased urban heat island effect and sea level rise.
 - The dry nature of the south east, coupled within high population densities within London, means that water resources are currently under significant pressure. The growth anticipated within London will further exacerbate this pressure. In addition, London has one of the highest rates of water use within the country and one of the highest rates of leakage

from the water supply distribution network. The London Plan IIA also identified that if there are two consecutive dry winters, London will be at risk of drought conditions and water supply restrictions.

- Domestic gardens comprise approximately 38,000 ha, or 24%, of the land area of London. It is estimated that approximately 60% of these gardens are actually green, as a number of now have extensive areas of car parking, decking or paving. It is possible that a further decline in the land area that is comprise of domestic could occur if a proactive approach to the intensification of suburbs to increase housing delivery is adopted.

- 8.3 The new draft London Plan (Intend to Publish version) contains a large housing target for a ten-year period (2019/2029). During this ten-year period, an additional 522,870 dwellings are to be provided, which is equivalent to 52,287 dwellings per annum. This is a reduction from the previous draft London Plan, which proposed a target of 64,935 dwellings per annum. The housing target for Brent, and its neighbouring boroughs, are detailed in Table 6.

Borough	Draft London Plan Target (Intend to Publish - 2019)	
	Total Ten Year Capacity	Annualised
Barnet	23,640	2,364
Brent	23,250	2,325
Camden	10,380	1,038
Harrow	8,020	802
Ealing	21,570	2,157
Hammersmith and Fulham	16,090	1,609
Kensington and Chelsea	4,480	448
City of Westminster	9,980	998
OPDC	13,670	1,367

- 8.4 It is considered that the greatest scope for in-combination effect on the identified European sites is through the delivery of additional housing and employment land.
- 8.5 As shown in the Table 7, the HRA's of Brent's neighbouring authorities concluded that no likely significant effect to the qualifying features of the European site will occur as a result of implementing their Plan

Local Planning Authority	Development Plan Document	Identified European Sites	Conclusion
Barnet	Core Strategy	Lee Valley, Epping Forest, Richmond Park, Wimbledon Common, Wormley-Hoddesdon Park Works (SAC)	Concluded that the implementation of the Core Strategy will have no likely significant effect on the integrity of the Natura 2000 sites.
	Draft Local Plan 2020	Lee Valley, Richmond Park, Epping Forest, Wimbledon Common	Concluded the draft Local Plan would not have any significant effects (alone or in combination) on any designated European Sites
Camden	Local Plan (2017)	Epping Forest, Lee Valley, Richmond Park, Wimbledon Common	Concluded that the Plan policies are unlikely to have significant effects on the sites of European Importance for habitats or species, or an adverse impact on the integrity of these sites.
Harrow	Core Strategy (2012)	Richmond Park, Wimbledon Common, Lee Valley, South West London Waterbodies'	Concluded that the implementation of the Core Strategy would not have an adverse impact on the integrity of any European Site.
	Area Action Plan, Site Allocations and Development Management Policies (2012)		Concluded that the three documents would not have an adverse impact on the integrity of any European site.
Ealing	Core Strategy (2012) HRA also used for Management, Sites and Policy Map	South West London Waterbodies, Richmond Park, Wimbledon Common	Concluded that the DPD documents would not result in impacts on the identified European Sites, and were not likely to have an adverse effect on their conservation objectives/integrity.

Local Planning Authority	Development Plan Document	Identified European Sites	Conclusion
	Development Plan Documents		
Hammersmith and Fulham	Local Plan (2018)	Richmond Park	Concluded that Richmond Park would not be significant adversely impacted upon by any of the policies in the Local Plan.
Kensington and Chelsea	Local Plan (2019)	Richmond Park, Wimbledon Common,	Concluded that the draft Local Plan will not have a significant/any effect on the relevant Natura 2000 sites.
City of Westminster	Local Plan (2016)	Wimbledon Common, Richmond Park, Epping Forest, Essex Estuaries, Thames Estuary and Marshes, Lee Valley	Concluded that the changes would not change the conclusions set out in the Appropriate Assessment for the Core Strategy, which was: <i>“It is not considered that Westminster is situated close enough to any of the designated European sites for there to arise direct and obvious detrimental effects on them as a result of the policies and proposals put forward for implementation in the Core Strategy”.</i>
	Draft City Plan (2019)	Wimbledon Common, Richmond Park, Lee Valley, Epping Forest, Thames Estuary and Marshes	No significant impacts on any European
OPDC	Draft Local Plan	Richmond Park, Wimbledon Common, Lee Valley, South	Concluded that the OPDC Local Plan is unlikely to have any significant effects on the identified

Local Planning Authority	Development Plan Document	Identified European Sites	Conclusion
		West London Water Bodies, Epping Forest	European Sites, either alone or in combination with other plans or projects.

- 8.6 Furthermore, the draft HRA for the new London Plan concluded that “*there are sufficient protective mechanisms in place to ensure that the growth objectives of the London Plan can be delivered without a likely significant effect on European sites, either alone or in combination with other plans and projects*’. The HRA recommended amendments to policies, or matters of directions to boroughs – none of which impacted upon Brent.

9. Assessment Outcome

- 9.1 This HRA screening report identified five European Sites that are within 15km of Brent. None of the screen European Sites are within, or adjacent to the borough. The policies and site allocations contained within draft Brent Local Plan were screened. As shown in Table 5, it was found that no policies would have HRA implications.
- 9.2 The report identified that there were five potential impact pathways in which development in Brent could impact on the identified European sites. These pathways are: urbanisation, recreational pressure, water levels, water quality and air quality. It is considered that the distance between Brent and the identified European Sites means that none of the aforementioned pathways would have a direct significant effect on the sites.
- 9.3 The policies and proposals within the Brent Local Plan have also been assessed in-combination with trends and development within London to identify whether any adverse impacts on the European sites would arise.
- 9.4 The conclusion of this assessment is that the policies and proposals contained within the emerging Brent Local Plan **is not likely to have significant effects on the qualifying features and integrity of the identified European sites**. The emerging Local Plan includes policies that seek the enhancement of the borough's open spaces, biodiversity and water quality, improvements to air quality and promotes water efficiency. Therefore, a comprehensive Appropriate Assessment is not considered to be necessary.

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 Brent	Full Council 19 February 2020
	Report from the Assistant Chief Executive
Members' Allowance Scheme – Annual Review	

Wards Affected:	All
Key or Non-Key Decision:	N/A
Open or Part/Fully Exempt: (If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)	Open
No. of Appendices:	None
Background Papers:	None
Contact Officer(s): (Name, Title, Contact Details)	James Kinsella, Governance Manager James.Kinsella@brent.gov.uk Tel. 0208 937 2063

1. Summary

- 1.1 A Members' Allowance Scheme - which sets out the allowances Members are entitled to receive for carrying out their responsibilities – has to be made for the financial year 2020/21.

2. Recommendations

That Full Council:

- 2.1 Makes a Members' Allowance Scheme in the proposed terms set out in this report for the financial year 2020/21, including the change in level of SRA payable to the Chair of the Audit & Standards Committee and Leader of the Opposition (payable with immediate effect) detailed within section 3.7 of the report.
- 2.2 That Full Council authorises the Director of Legal, HR Audit & Investigations to comply with the statutory requirements to publicise the Council's Members' Allowance Scheme.

3. Detail

Background

- 3.1 Brent Council's Members' Allowance Scheme (which is included in the Council's Constitution at Part 6 and is published on the Council's website) was subject to full formal review at the Annual Council Meeting in 2018 and annual review in February 2019. This followed publication of the latest report by the Independent Remuneration Panel (IRP) for London Councils in January 2018 entitled "The Remuneration of Councillors in London 2018 – Report of the Independent Panel".
- 3.2 It is for Full Council to make a scheme for the payment of allowances to its Members specifying the amount of entitlement by way of basic allowance (which is mandatory) and other allowances such as special responsibility and dependants' carers' allowances (which are discretionary). Such a scheme has to be in accordance with the Local Authorities (Members' Allowances) (England) Regulations 2003 and the Council is required to have regard to the recommendations made by the independent remuneration panel. The full review undertaken in May 2018 led to a number of changes to the Scheme including the level of basic and special responsibility allowances (SRA), with subsequent changes agreed in relation to the payment of travel and subsistence for members with disabilities and dependants' carers' allowances.
- 3.3 The most recent independent review can continue to inform the Council's decision-making in respect of its scheme for a maximum period of four years. Therefore, the recommendations in the 2018 IRP report still remain valid.
- 3.4 Members are reminded that the 2018 Report advocates the setting of allowances at a level that enables people to undertake the role of councillor while not acting as an incentive to do so. It is equally important, as acknowledged, that there should not be a financial disincentive.

Annual Uplift

- 3.5 The scheme states that Basic, Special and Civic allowances "shall be increased with effect from each April, by a percentage equal to the inflation pay award agreed as part of the Local Government Pay Settlement in the previous financial year, unless otherwise determined by the Council".
- 3.6 The uplift for 2019/20 was applied, following the last annual review in February 2019. The Local Government Pay Inflation Settlement to be considered as the basis for this review totals 2%. Council is therefore asked to agree the 2% uplift being applied in relation to the Members Allowance Scheme for the 2020/2021 financial year, which would become effective from the 1 April 2020.

Special Responsibility Allowances

- 3.7 The annual review has also included consideration of Special Responsibility Allowance (SRA) payments, which had also resulted in the following proposed changes.
- 3.7.1 In order to reflect the enhanced remit in relation to the Audit & Standards function, it is recommended that the allowance for the Chair of the Audit & Standards Committee (who also serves as Vice-Chair on the Audit & Standards Advisory Committee) should be increased to match that provided for similar roles across other boroughs within London. This would involve an increase in the level of SRA from £1,500 to £5,000.
- 3.7.2 Following consideration at the Constitution Working Group (CWG), a review has been also been undertaken of the level of allowance payable to the Leader of the Principal Opposition Group on the Council. As a result, it is recommended that this SRA be subject to a small increase in order to match the average provided for the same role across other comparable boroughs (in terms of their political balance) within London. This would involve an increase in the level of SRA from £6,000 to £8,000. In support of this recommendation, a full review of the SRA payable in relation to the role of Opposition Group Leader(s) related to the size of their Group(s) will also be undertaken prior to the next local election in May 2020.

Publicity

- 3.8 As soon as reasonably practicable after the making or amendment of a Scheme, copies of the Scheme have to be made available for inspection at the Civic Centre and a notice has to be published in a local newspaper. It is recommended that the Director of Legal, HR, Audit & Investigations be authorised to comply with these requirements.

4. Financial Implications

- 4.1 The actual overall cost of the payment of allowances depends on which Members are appointed to the roles where an SRA is received, as only one such allowance is payable irrespective of the number of roles held. At the end of each financial year, the payments made to each Member are published in accordance with statutory rules.
- 4.2 The cost of applying the inflationary uplift is contained within the council's overall budgetary estimates for the financial impact of inflation with the change in SRA payments to be met from within existing resources.

5. Legal Implications

- 5.1 The proposed Members' Allowance Scheme complies with the relevant provisions of the Local Authorities (Members' Allowances) (England) Regulations 2003; the Local Government and Housing Act 1989 and the Local Government Act 2000.

6. Consultation with Ward Members and Stakeholders

- 6.1 The changes being recommended in this report were subject to consultation with the Constitution Working Group in February 2020.

7. Equality Implications

- 7.1 Under section 149 of the Equality Act 2010, the council has a duty when exercising its functions to have “due regard” to the need to eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act and advance equality of opportunity and foster good relations between persons who share a protected characteristic and persons who do not. This is the public sector equality duty. The protected characteristics are age, disability, gender reassignment, marriage and civic partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

- 7.2 “Due regard” is the regard that is appropriate in all the circumstances. The weight to be attached to the effect is a matter for the council. As long as the council is properly aware of the effects and has taken them into account, the duty is discharged. Depending on the circumstances, regard should be had to the following:

- the need to enquire into whether and how a proposed decision disproportionately affects people with a protected characteristic. In other words, the indirect discriminatory effects of a proposed decision;
- the need to remove or minimise disadvantages suffered by persons who share a protected characteristic that are connected to that characteristic;
- the need to take steps to meet the needs of persons who share a protected characteristic that are different from the needs of persons who do not share it. This includes taking account of disabled persons’ disabilities. There can be a positive duty to take action to help a disabled person. What matters is how they are affected, whatever proportion of the relevant group of people they might be;
- the need to encourage persons who share a protected characteristic to participate in public life (or in any other activity in which participation by such persons is disproportionately low); and
- the need to tackle prejudice and promote understanding.

- 7.3 In terms of the outcome of the 2018 Independent Review, the Panel have continued to advocate the setting of allowances at a level that enables people to undertake the role of councillor, whilst not acting as an incentive to do so. The changes made in relation to members with disabilities and dependents’ carers are a further example of how the scheme can be used to remove barriers for those wishing to stand and to ensure any disadvantages are removed or minimised.

8. Human Resources/Property Implications (if appropriate)

None.

Report sign off:

SHAZIA HUSSAIN

Assistant Chief Executive

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	Full Council 19th February 2020
	Report from the Director of Legal HR, Audit & Investigations
Changes to the Constitution	

Wards Affected:	N/A
Key or Non-Key Decision:	N/A
Open or Part/Fully Exempt: (If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)	Open
No. of Appendices:	None
Background Papers:	None
Contact Officer(s): (Name, Title, Contact Details)	Debra Norman, Director of Legal, HR, Audit & Investigations. Tel: 020 8937 1578 Email: debra.norman@brent.gov.uk

1.0 Purpose of the Report

- 1.1 This report is provided in accordance with Standing Order 5(a) to inform Council of a number of small changes to the Council's Constitution. These are to reflect an increase in EU procurement thresholds and to remove some identified inconsistencies.

2.0 Recommendations

- 2.1 To approve the changes to the Constitution in this report.
- 2.2 To authorise the Director of Legal and HR Services to amend the Constitution accordingly, including making any necessary incidental or consequential changes.
- 2.3 To note that, to the extent that the changes relate to executive functions of the Council, they have been approved by the Leader.

3.0 Detail

- 3.1 A general review of the Constitution is undertaken annually to check whether there are any minor, general updating, clarification or consistency changes that need to be made to the Constitution in addition to more substantive changes taken to Council for approval as they arise. This report updates Council on changes following this review made by the Director of Legal, HR, Audit & Investigations using her delegated powers and seeks Council approval of them.

Consistency Changes

- 3.2 An inconsistency has been noted in the Constution in respect of the terms “Department” and “Service Area”. This creates uncertainty as to which officers are able to exercise particular powers. Changes are therefore required to define these terms and to make amendments throughout the body of the Constitution where needed to reflect these definitions and ensure consistency. The definitions are as follows:
- The Council has a number of **Departments**. These are Chief Executive’s, Customer and Digital Services, Children and Young People, Community Wellbeing, and Regeneration and Environment.
 - The Council has a number of **Service Areas** within each of its Departments, which are headed up by Operational Directors.
- 3.3 A change is proposed in Part 4 to clarify that references to the responsibilities of Cabinet includes responsibilities that are allocated to individual members.

Changes to reflect legislation

- 3.4 The European Commission has published revised sterling equivalent EU Thresholds that will apply from 1 January 2020 to procurements under the Public Contracts Regulations 2015 and the Concession Contracts Regulations 2016. Brent Standing Orders specify the EU Thresholds and therefore, required updating in line with the revised sterling equivalent EU Thresholds.
- 3.5 This updating was undertaken using delegated powers before the new thresholds came into effect in Janaury 2020 to ensure that Standing Orders reflect the legislative position.

General

- 3.6 The Constitution currently requires variations to the Constitution under delegated powers, which are to be made to remove inconsistency or ambiguity or to comply with any statutory provision, to be reported to Council. Council is invited to consider the amendment to this provision set out below so small variations to the Constitution, such as those contained in this report, no longer need to be reported to Council for approval.

“The Constitution may be varied by the Director of Legal, HR, Audit & Investigations if in his or her reasonable opinion a variation is a minor variation (which includes legal, factual, administrative and other technical changes) or is required to be made to remove any other inconsistency or ambiguity or is required to be made so as to comply with any statutory provision. Any such variation made by the Director of Legal, HR, Audit & Investigations Services shall come into effect on the date specified by him or her.”

4.0 Financial Implications

4.1 None.

5.0 Legal Implications

5.1 These are contained in the body of the report.

6.0 Equality Implications

6.1 Under section 149 of the Equality Act 2010, the council has a duty when exercising its functions to have “due regard” to the need to eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act and advance equality of opportunity and foster good relations between persons who share a protected characteristic and persons who do not. This is the public sector equality duty. The protected characteristics are age, disability, gender reassignment, marriage or civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

6.2 No equalities implications arise directly from this report.

7.0 Consultation with Ward Members and Stakeholders

7.1 The proposals in this report have been considered by the Council’s Constitutional Working Group.

8.0 Human Resources/Property Implications (if appropriate)

8.1 None.

Background Papers

None

Report sign off:

DEBRA NORMAN

Director of Legal, HR, Audit & Investigations

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