



Cabinet

Monday 13 October 2014 at 7.00 pm

Boardroom - Brent Civic Centre, Engineers Way,
Wembley, HA9 0FJ

Membership:

Lead Member Councillors:

Portfolio

Butt (Chair)
Pavey (Vice-Chair)
Denselow
Hirani
Mashari
McLennan
Moher
Vacancy

Leader of the Council
Deputy Leader of the Council
Lead Member for Stronger Communities
Lead Member for Adults, Health and Well-being
Lead Member for Employment and Skills
Lead Member for Regeneration and Housing
Lead Member for Children and Young People

For further information contact: Anne Reid, Principal Democratic Services Officer
020 8937 1359, anne.reid@brent.gov.uk

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democracy.brent.gov.uk

The press and public are welcome to attend this meeting

Agenda

Introductions, if appropriate.

Apologies for absence.

Item	Page
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1	Declarations of personal and prejudicial interests	
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Members are invited to declare at this stage of the meeting, any relevant financial or other interest in the items on this agenda.

2	Minutes of the previous meeting	1 - 12
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3	Matters arising	
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Children and Young People reports

4	School Place Planning Strategy 2014-18	13 - 66
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This report seeks approval of the final version of the School Place Planning Strategy 2014-18 following consultation. The draft version was approved by the Council's Executive in March 2014 as a basis for consultation. This covering report also draws out a number of key issues for decision by the Cabinet which relate to specific schools and sites.

Ward Affected:
All Wards

Lead Member: Councillor Moher
Contact Officer: Sara Williams, Operational
Director, Early Help and Education
Tel: 020 8937 3510 sara.williams@brent.gov.uk

Environment and Neighbourhoods reports

5	Event Day Parking and Vehicle removals (pilot)	67 - 76
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In April 2014 the Council's Executive (Cabinet) decided to make some alterations to the Council's methods for removing illegally parked vehicles, and also relax Civil Enforcement Officer deployment on Wembley Stadium Event Days. This report summarises the impact of the trial on the Council's Vehicle Removal operations, and consequently makes recommendations for future vehicle removal activity. This report also provides an update on the validity of Visitor Parking Scratch Cards, which were scheduled to be removed from circulation on 31 August 2014.

Ward Affected:
All Wards

Lead Member: Councillor Butt
Contact Officer: Michael Read, Operational
Director (Environment and Protection)

Regeneration and Growth reports

6 Wembley Area Action Plan 77 - 86

This report explains that the Council has received an Inspector's report into the Examination of the Wembley Area Action Plan Development Plan Document and that the Inspector finds the document sound subject to recommended changes being made. It asks Cabinet to recommend to Full Council that the Area Action Plan be adopted with the changes incorporated.

Ward Affected:

Tokington;
Wembley
Central

Lead Member: Councillor McLennan

Contact Officer: Claire Jones, Principal Planner
in Policy and Projects
Tel: 020 8937 5301 claire.jones@brent.gov.uk

7 Sudbury Neighbourhood Plan 87 - 152

This report provides an overview of the process which Sudbury Town Residents Association has followed to date in producing the draft Sudbury Town Neighbourhood Plan, and a summary of its content. It recommends that the draft Plan be published on 23 October 2014 and made available for comment for 6 weeks. It is also recommended that it be submitted for examination subject to Full Council approval.

Ward Affected:

Sudbury

Lead Member: Councillor McLennan

Contact Officer: Claire Jones, Principal Planner
in Policy and Projects
Tel: 020 8937 5301 claire.jones@brent.gov.uk

8 Customer Access strategy and target operating model 153 - 204

This report sets out proposals for transforming the arrangements that we have in place to enable residents to access information and services more easily and more efficiently. The aim of the new strategy is both to improve residents' experience when they do contact Brent and increase the efficiency of our overall operating arrangements.

Ward Affected:

All Wards

Lead Member: Councillor Butt

Contact Officer: Margaret Read, OD Customer
Services
Tel: 020 8937 1521
margaret.read@brent.gov.uk

Central Reports

9 Budget strategy and financing update

205 -
218

This report updates the Council's funding forecasts for the next four years. It takes account of anticipated spending pressures, whether driven by changes in legislation, demographic trends or local policy intentions and provides updated estimates of the financial impact of these. It also takes account of updated information on financing from central government and other sources, where this is available. The report therefore provides an updated summary of the significant financial challenges that the council will need to meet over the next four years, with a particular emphasis on the years 2015/16 and 2016/17. This report does not deal with proposed savings. It merely sets out the financial context against which savings will need to be considered as part of the normal budget making process

Ward Affected:
All Wards

Lead Member: Councillor Pavey
Contact Officer: Mick Bowden, Operational
Director, Finance
Tel: 020 8937 1460 mick.bowden@brent.gov.uk

10 Financial report – August 2014

219 -
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The report sets out the overall financial position of the Council for 2014/15 as at August 2014 and covers the following topics: Budget monitoring summary; Council Tax and NNDR collection rates; Debt analysis; Capital Programme summary; Financial Control.

Ward Affected:
All Wards

Lead Member: Councillor Pavey
Contact Officer: Eamonn McCarroll,
Operational Director, Finance
Tel: 020 8937 2468
eamonn.mccarroll@brent.gov.uk

11 Procurement of the Customer Services ACD Telephone System

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242

This report concerns the procurement of an Automated Call Distribution (ACD) system to replace the existing solution provided to the council by Interactive Intelligence. This report requests approval, as required by Contract Standing Orders 88 and 89, to invite tenders in respect of a solution to enable the council to manage and handle incoming telephone calls, customer emails, webchat and social media customer interaction.

Ward Affected:
All Wards

Lead Member: Councillor Pavey
Contact Officer: Prod Sarigianis, Head of IT
Service Transitions
Tel: 020 8937 6080
prod.sarigianis@brent.gov.uk

12 Procurement of Housing and Revenues and Benefits systems 243 - 250

This report requests authority to award a contract as required by Contract Standing Order No 88. This report summarises the process undertaken in procuring this contract and recommends to whom the contract should be awarded.

(appendix referred to below)

Ward Affected:
All Wards

Lead Member: Councillor Pavey
Contact Officer: Prod Sarigianis, Head of IT
Service Transitions
Tel: 020 8937 6080
prod.sarigianis@brent.gov.uk

13 Reference of item considered by Scrutiny Committee - 9 September 2014: Parking Services update 251 - 254

The recommendations to Cabinet from the Scrutiny Committee held on 9 September 2014 are attached.

Adult Social Care reports - none

14 Exclusion of Press and Public

The following item is not for publication as it relates to the following category of exempt information as specified in the Local Government Act 1972 namely:

"Information relating to the financial or business affairs of any particular person (including the authority holding that information)"

Appendix: Procurement of Housing and Revenues and Benefits systems
(report above refers)

15 Any other urgent business

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

Date of the next meeting: Monday 10 November 2014



- Please remember to set 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 CABINET Monday 15 September 2014 at 2.00 pm

PRESENT: Councillor Butt (Chair), Councillor Pavey (Vice-Chair) and Councillors Denselow, Hirani, Mashari, McLennan, Moher and Perrin

Also present: Councillors Colacicco, Collier, Filson, Hector and Warren

1. **Declarations of personal and prejudicial interests**

None made.

2. **Minutes of the previous meeting**

RESOLVED:

that the minutes of the previous meeting held on 26 August 2014 be approved as an accurate record of the meeting.

3. **Matters arising**

None.

4. **Deputations**

None.

5. **Brent Education Commission Review**

The Cabinet at its meeting on 16 June 2014 considered the Brent Education Commission Report and resolved that the Lead Member responsible for Children and Young People and the Strategic Director, Children and Young People, consider the recommendations in detail and bring back a report in September 2014 with an action plan based on those recommendations that were accepted and would be taken forward.

Councillor Moher (Lead Member, Children and Young People) referred to the importance of improving partnerships and engaging with schools to improve education. The council was trying to foster good relations with academies, to build trust with schools and to be seen as an authority that provided good services. She referred members to the recommendations in the action plan and welcomed any further comments.

The Strategic Director of Children and Young People advised that a recent meeting of the Brent Partnership Board had been very positive. Councillor Mashari (Lead Member, Employment and Skills) welcomed the proposals in the report and the Director confirmed that those scheduled for 2014 were in progress and those for 2015 were on-going. Additionally, collaborative work was taking place with school governors so they could be more effective in their role on governing bodies and schools new to the borough would be contacted about arrangements and expectations. Councillor Pavey (Deputy Leader) welcomed the opportunity for schools to bid for innovation and improvement funding, working with Brent Schools Partnership to help delivery. He also drew attention to the challenge of school places and the need for the council to work to attract quality providers and work with partners to promote new and support existing schools.

RESOLVED:

- (i) that the high level Brent Education Commission Action Plan – Ambitious for All be endorsed;
- (ii) that it be noted that the Scrutiny Committee forward plan requested a six month update on implementation of the Education Commission action plan at its meeting on Tuesday 10 February 2015.

6. School Expansion Programme - approval to procure works contracts for Phase 3 Projects

Councillor McLennan (Lead Member, Regeneration and Housing) introduced the report which sought approval to a new strategy for the procurement of works contracts for the next phase of the school expansion programme (Phase 3), which aimed to provide sufficient permanent school places to meet demand from September 2015. Councillor McLennan explained that the delivery of the school expansions to time and budget was becoming increasingly difficult, partly as a consequence of changes in the construction market which were making it more difficult to procure contractors to build the schools. The proposal was to bundle school expansion projects into packages so as to be more attractive to contractors.

Councillor Moher (Lead Member, Children and Young People) welcomed the proposals and the increased opportunity to provide school places, sentiments echoed by the other Cabinet members. The Strategic Director, Regeneration and Growth confirmed that the usual consultation arrangements for expansions with schools and stakeholders would still apply.

RESOLVED:

- (i) that approval be given to the strategy for the procurement of works as set out in paragraph 3.16 of the report to deliver the Phase 3 School Expansion Programme of projects;
- (ii) that approval be given to the invite of tenders on the basis of the pre-tender considerations set out in paragraph 3.17 of the joint report from the Strategic Directors of Children and Young People and Regeneration and Growth where this was considered by the Strategic Director of Regeneration and Growth, in consultation with the Lead Member for Regeneration and

Housing, the Director of Legal and Procurement and Chief Finance Officer, as the most appropriate procurement route in accordance with the strategy for the procurement of works to deliver the Phase 3 School Expansion Programme;

- (iii) that in respect of paragraph (ii) above, approval be given to the evaluation of tenders on the basis of the evaluation criteria set out in paragraph 3.17 of the report. Following evaluation, Cabinet approval will be sought to award high value contracts in accordance with Council Standing Orders;
- (iv) that it be noted that officers would review a medium term procurement solution for the development and delivery of capital projects (including establishment of a Brent contractors framework) and report back to Cabinet early in the New Year, as described in paragraph 3.15 of the report.

7. Domestic Violence Advocacy, Family Support and MARAC coordination services

The report from the Strategic Director, Environment and Neighbourhoods requested authority to award a contract for the provision of domestic violence advocacy service and family support and also multi agency risk assessment conference (MARAC) coordination as required by Contract Standing Order No 88. The report summarised the process undertaken in tendering the contract and, following the completion of the evaluation of the tenders, recommended to whom the contract should be awarded.

The Executive also had before them an appendix to the report which was not for publication as it contained the following category of exempt information as specified in Schedule 12 of the Local Government (Access to Information Act) 1972:

Information relating to the financial or business affairs of any particular person (including the authority holding that information).

Councillor Denselow (Lead Member for Stronger Communities) in introducing the report, stressed the importance of needs in this area being met and referred to the appointment of a shadow minister for preventing violence against women and girls, Seema Malhotra, the first MP to hold this title. He referred to the high incidence of domestic violence, the problem of late reporting and the key issue that violent crime and studies have shown that 25% of young male offenders had experienced domestic violence at home. Councillor Denselow emphasised the council's commitment to the provision of a quality service and the paid tribute to the work of the advocacy service and MARAC coordination service that would now be carried out by Hestia Housing and Support.

Members welcomed the proposals and Councillor Mashari (Lead Member, Employment and Skills) referred to the need for services to be based around Customer Services where many presented. Councillor Hirani (Lead Member for Adults, Health and Well-being) referred to the decrease in crime which contrasted to the rise in domestic violence incidents. In response to a question on outreach work, Councillor Denselow added that much activity was taking place in other areas, including work to counteract female genital mutilation and the Cabinet

recognised that there was a cultural and sociological context to underreporting in general.

RESOLVED:

that the contract for the provision of a domestic violence advocacy service for women 16 years old and over, domestic violence family support and MARAC (Multi Agency Risk Assessment Conference) coordination service for all high risk victims be awarded to Hestia Housing and Support.

8. Brent Local Implementation Plan (LIP) submission for 2015/16 - 2017/18

Councillor Perrin (Lead Member for Environment) introduced the report which sought approval to submit the 2015/16 LIP to TfL and, following the approval of that body, to implement the schemes and initiatives within the submitted/approved LIP programme and funding. Local Implementation Plan funding was the primary source of funding for schemes and initiatives to improve transport infrastructure and travel behaviour in Brent allocated through Transport for London (TfL). Councillor Perrin outlined how the funding was proposed to be spent such as on cycle routes and collision reduction schemes.

Members welcomed the plan and in particular schemes relating to sustainable transport, air quality and school travel plans. Martin Francis (Brent Green Party) asked about progress of talks with TfL over bus route 206 which carried a high number of children travelling to the Ark Academy School in Wembley and expressed safety concerns particularly at the end of the school day. Councillor Butt (Chair, Leader of the Council) responded that discussions were continuing with a view to increasing capacity.

RESOLVED:

- (i) that the 2015/16 TfL provisional LIP allocation of £3,473,000 be noted;
- (ii) that approval be given to the proposed 2015/16 programme of LIP schemes, as set out in Appendix A of the report from the Strategic Director of Environment and Neighbourhoods, through application of the priority assessment tool described in the report and, subject to TfL approval in autumn 2014, the Head of Transportation be instructed to deliver the programme using the allocated budget and resources available;
- (iii) that the Head of Transportation be authorised to undertake any necessary statutory and non-statutory consultation and consider any objections or representations regarding the schemes set out in Appendix A of the report. If there were no objections or representations, or the Head of Transportation considers the objections or representations are groundless or insignificant, the Head of Transportation be authorised to deliver the schemes set out in Appendix A of the report. Otherwise, the Head of Transportation be authorised to refer objections or representations to the Highway Committee for further consideration;

- (iv) that it be noted that the scheme allocations were provisional and that schemes may be subject to change during development and following the consultation process;
- (v) that the Head of Transportation be authorised to vary scheme allocations where necessary (eg. pending the outcome of detailed design and consultation) within the overall LIP budget, in consultation with the Lead Member for Environment and Neighbourhoods and in accordance with financial regulations.

9. Consultation on the proposed Mayoral Development Corporation for Old Oak and Park Royal

Councillor McLennan (Lead Member for Regeneration and Housing) reminded members that Central Government had announced proposals for a new High Speed 2 and Crossrail interchange at Old Oak by 2026. Based around the opportunities presented by the new interchange and national and sub regional transport connections, the London Boroughs of Brent, Hammersmith and Fulham, and Ealing, as well as the Greater London Authority (GLA) and Transport for London (TfL), have produced a vision for regenerating the Old Oak area.

Councillor McLennan stated that the Mayor of London was now consulting on proposals to establish a Mayoral Development Corporation (MDC) for Old Oak and Park Royal to take the lead on the planning and regeneration of the area. Councillor McLennan acknowledged that a significant number of local businesses and residents would be impacted however a number of meetings had taken place and the aim was to get the best for Brent residents such as employment opportunities, generating development and providing affordable housing.

Councillor Pavey (Deputy Leader, Lead Member for Resources) acknowledged that there were differing views on the approach the council should adopt to get the best deal whether to reject proposals or negotiate at the outset. Councillor Mashari (Lead Member for Employment and Skills) stressed the need for local businesses to have representation on the MDC and also suggested that employment should be included in the list of local benefits.

Non-cabinet members and members of the public also contributed to the debate. The view was put that the council should oppose the MDC at the outset and then only work with it once established. It was questioned whether the Leader of the Council was best placed to sit on the MDC given his existing time commitments and whether the MDC was the right organisation to take forward views. On transport, it was felt that an extra station on the London overground line would not be sufficient. The public would want to travel between Wembley Central and Willesden Junction. There was also a view that more social housing should be provided and the Strategic Director, Regeneration and Growth confirmed that the council would be arguing for a housing mix, affordable for Brent residents.

Councillor Butt (Chair, Leader of the Council) re-emphasised the aim of getting good outcomes for residents and the council was united with the other boroughs. To have Wembley Central Station as a HS2 destination was key. He also agreed on the need for more affordable housing and the reference to employment as a benefit.

The Chair thanked those present for their contributions.

RESOLVED:

- (i) that the council response to the consultation cover the issues set out in paragraphs 3.25 to 3.29 of the report from the Strategic Director of Regeneration and Growth be approved;
- (ii) that authority be delegated to the Strategic Director of Regeneration and Growth in consultation with the Leader of the Council to finalise the exact wording of the final response.

10. Housing Zones bid for Alpertion and Wembley

Councillor McLennan (Lead Member for Regeneration and Housing) in introducing the report from the Strategic Director of Regeneration and Growth advised that London boroughs have been invited by the Greater London Authority (GLA) to bid for a £400 million programme, jointly funded by the Mayor and national government, to create 20 Housing Zones across London, delivering 50,000 new homes and over 100,000 associated jobs over the next ten years. It was proposed submit bids to the GLA to establish separate Housing Zones in two of the borough's identified growth areas, in Alpertion and in Wembley which would unlock and accelerate the delivery of new homes but also increase the number of homes and the yield of affordable housing on development sites in the growth area.

In answer to a question from Councillor Perrin (Lead Member for Environment) Andrew Donald (Strategic Director, Regeneration and Growth) confirmed that the plans could involved the relocation of some businesses and discussions with the GLA were ongoing. He also reminded the Cabinet of the Alpertion Master Plan agreed in July 2011 which considered the infrastructure, social and welfare needs of new and existing communities in the Alpertion area. The Chair reminded members of the discussion earlier in the afternoon relating to the proposed new High Speed 2 and Crossrail interchange to which Wembley and Alpertion would be key. Andrew Donald acknowledged that given the existing transport links in some areas of Alpertion, the housing bid would need to include bus diversion and improved provision.

RESOLVED:

- (i) that the proposal to submit a bid to the GLA for Alpertion to become a Housing Zone be endorsed;
- (ii) that the proposal to submit a separate bid to the GLA for Wembley to become a Housing Zone be endorsed;
- (iii) that authority be delegated to the Strategic Director of Regeneration and Growth to approve the final Housing Zone bids due for submission on 30 September 2014;
- (iv) that, if either or both bids are successful, a further report be brought to Cabinet on the required funding agreements between the Council and the GLA, and any associated matters, requiring approval.

11. **South Kilburn Regeneration Programme**

The report from the Strategic Director of Regeneration and Growth related firstly to Peel Precinct, 97 to 112 Carlton House and 8 to 14 Neville Close (together defined as 'the Peel Site' and as shown edged red on plan at Appendix 1), which included 36 affordable homes which were currently occupied by secure tenants (the 'Peel Homes') which were due for demolition as a stand alone Phase of the South Kilburn regeneration programme. It also related to Phase 3 of the South Kilburn regeneration programme.

Councillor McLennan (Lead Member, Regeneration and Housing) in introducing the report was particularly pleased that the Peel development included a long awaited health centre and also affordable housing and residential development that was fit for the 21st Century. She reminded the Cabinet that approval had already been given to compulsorily purchase properties currently occupied by secure tenants if necessary. Tenants would be made a suitable offer of a new replacement home and have a 'right to return' to the area.

Councillor Mashari (Lead Member, Employment and Skills) raised questions on the input from South Kilburn Trust and from retail and business interests. Councillor McLennan confirmed that the council was in regular contact with the South Kilburn Trust which it hoped would be formalised and the Strategic Director, Regeneration and Growth referred to the existing small businesses in the area and the larger ones that would be encouraged. Consultation would continue.

The Executive also had before them an appendix to the report which was not for publication as it contained the following category of exempt information as specified in Schedule 12 of the Local Government (Access to Information Act) 1972:

Information relating to the financial or business affairs of any particular person (including the authority holding that information).

RESOLVED:

- (i) that approval be given to the invite of tenders for a full design team for the comprehensive redevelopment of Peel Precinct, 97 to 112 Carlton House and 8 to 14 Neville Close (together defined as 'the Peel Site') on the basis of the pre-tender considerations set out in paragraph 3.8 of the report from the Strategic Director Regeneration and Growth;
- (ii) that approval be given to the evaluation of the tenders referred to in paragraph (i) above on the basis of the evaluation criteria set out in paragraph 3.8 of the report;
- (iii) that, having noted and considered the responses to the consultation as set out in Appendix 2 in connection with seeking approval of the Secretary of State for use in seeking possession of the 36 affordable homes which are currently occupied by secure tenants (the 'Peel Homes') under Ground 10A of Schedule 2 to the Housing Act 1985, authority be delegated to the Strategic Director of Regeneration and Growth to seek the Secretary of State's consent pursuant to Part V of Schedule 2 to the Housing Act 1985 to

the disposal and development of the Peel Site for the purpose of Ground 10A of Schedule 2 to be used to obtain possession of the Peel Homes;

- (iv) that, having noted and considered the responses to the consultation as set out in Appendix 2 in connection with the intention to make a Compulsory Purchase Order (CPO) on the Peel Homes and in connection with the draft Allocation Policy for the Peel Homes, approval be given to the adoption of the Allocation Policy which will apply to the Peel Homes and which includes the proposal to make a CPO on the Peel Homes as well as seeking possession of the Peel Homes, subject to the Secretary of State's consent, under Ground 10A of Schedule 2 to the Housing Act 1985. This Allocation Policy sets out the basis on which replacement homes will be allocated to secure tenants in the Peel Homes and the legal means to be adopted for seeking possession of the Peel Homes through the use of Ground 10A of the Housing Act 1985 (if approval is given by the Secretary of State) and compulsory purchase powers under section 226(1)(a) of the Town and Country Planning Act 1990.

Phase 3

- (v) that the Strategic Director of Regeneration and Growth be authorised to commence statutory consultation with secure tenants residing in blocks Hereford House and Exeter Court (being part of 'Phase 3') on three proposals (i) statutory consultation in connection with seeking approval of the Secretary of State for use of Ground 10A of the Housing Act 1985 (ii) consultation on the Council's proposal to make a CPO on properties in Hereford House and Exeter Court that are currently occupied by secure tenants (iii) consultation in connection with the draft allocation policy for allocating homes to secure tenants living within Hereford House and Exeter Court. Officers to report back to the Cabinet on the outcome of the statutory consultation and may, depending on the outcome of the consultation seek Cabinet approval to (i) authorise the Director of Regeneration and Growth to seek the Secretary of State's consent to the disposal and development of the Peel Site for the purpose of Ground 10A of the Housing Act 1985, (ii) authorise the final Allocation Policy for Hereford House and Exeter Court, and (iii) proceed with securing vacant possession of properties within Hereford House and Exeter Court occupied by secure tenants through negotiation and private treaty and then, if necessary, via possession proceedings based on Ground 10A and CPO.

12. Developing the Brent Borough Plan 2015-2019

The Chair (Leader of the Council, Councillor Butt) introduced the report from the Chief Executive which set out proposals for the development of the Brent Borough Plan for the period 2015–2019 following the local elections in May 2014. It covered the key challenges for developing a strategic, partnership agenda for the borough and outlined a programme for engaging with residents and key partners to create an ambitious programme of change, during a period of continued financial constraint. The Chair drew members' attention to the consultation arrangements which included a 'Call for Evidence', focus groups, surveys and coverage on social media. Wards had a number of active groups and it was hoped to raise awareness

across the borough. Partners for Brent had considered the need for a clearer focus on young people.

In discussion with non-Cabinet members and members of the public, the value of engaging with community and residents associations was emphasised and accepted by members of the public present. The plan was an important tool to help change the way the council operated and it was agreed that lessons should be learned from good practice in other local authorities. Councillor Butt assured that the council would be using a variety of customer insight techniques to be able to effectively target areas and ensure that all communities had the opportunity to contribute to the debate and that the council would listen. He drew attention the consultation timetable which would start in September and run into November 2014.

RESOLVED:

- (i) that the proposed arrangements for consulting on and developing the next Brent Borough Plan 2015 – 2019 be endorsed;
- (ii) that approval be given the timetable of actions set out at 3.15 of the Chief Executive's report.

13. **Update on Public Health Contracts**

Councillor Hirani (Lead Member for Adults, Health and Well-being) in introducing the report on public health contracts referred back to the Health and Social Care Act 2012 which conferred on local authorities the function of improving public health. The report from the Assistant Chief Executive provided an update to the Cabinet report of 13 January 2014 on future arrangements for public health contracts that the council inherited from the NHS. It provided an update on the proposed procurement process for contracts for 2015/16 onwards and requests approval to invite tenders in respect of such contracts as required by Contract Standing Orders 88 and 89 under council procedures. The Cabinet heard that the current contracts being re-procured had a combined value of £7.77 million. Public health contracts in 2015/16 would be a call upon the ring fenced public health grant.

In response to a question on school nurses and what could be hoped for in issues around family planning and FGM (female genital mutilation), Councillor Hirani acknowledged that there was only one bidder but advised that the relationship with schools was a main theme and he hoped for a proactive approach in referrals to nurses and for more to be done with the data that had been collected. Melanie Smith (Director of Public Health) responded to question on cross borough charging and stated that the council hoped to do collaborative negotiation with other boroughs. The Cabinet noted that while contractors may prefer three year contracts, the terms offered had been two years with the possibility of extension, should funding be available. The Cabinet also noted that contracts were demand led and would be reconsidered in the future.

RESOLVED:

- (i) that the progress made in developing options for the future commissioning and procurement of public health services be noted;

- (ii) that approval be given to the invite of tenders for the public health contracts detailed in Annexes 1–11 of the report from the Assistant Chief Executive on the basis of the pre - tender considerations set out in respect of each contract in Annexes 1-11 of the report;
- (iii) that approval be given to the evaluation of the tenders referred to in paragraph (ii) above on the basis of the evaluation criteria set out in respect of each contract in Annexes 1–11 of the report;
- (iv) that approval be given to an exemption from the usual tendering requirements of Contract Standing Orders in accordance with Contract Standing Order 84(a) to permit the negotiation of 2015/16 Genito-Urinary Medicine contracts as detailed in paragraph 4.9 and to permit the procurement on behalf of Brent Council of the Pan London HIV Prevention Programme by the London Borough of Lambeth and the consequent use of its own Contract Standing Orders as detailed in paragraph 4.7 of the report;
- (v) that authority be delegated to the Director of Public Health, in consultation with the Director of Legal and Procurement and Chief Finance Officer, to participate in negotiation of 2015/16 Genito-Urinary Medicine contracts as set out in paragraph 4.9 of the report.

14. Performance report - Quarter 1

The Chair (Leader of the Council, Councillor Butt) introduced the report which provided members with a corporate overview of performance information linked to the current priorities for Brent, to support informed decision-making, and to manage performance effectively.

RESOLVED:

- (i) that the performance information contained in the report from the Assistant Chief Executive be noted and remedial actions agreed as necessary;
- (ii) that the current and future strategic risks associated with the information provided be noted and agreement given to remedial actions as appropriate.

15. Reference of item considered by Scrutiny Committee

None.

16. Any other urgent business

None.

The meeting ended at 3.45 pm

M BUTT
Chair



Cabinet
13 October 2014

**Report from Strategic Director,
Children and Young People**

School Place Planning Strategy 2014-18

1.0 Summary

- 1.1** This report seeks approval of the final version of the School Place Planning Strategy 2014-18 following consultation. The draft version was approved by the Council's Executive in March 2014 as a basis for consultation.
- 1.2** This covering report also draws out a number of key issues for decision by the Cabinet which relate to specific schools and sites.

2.0 Recommendations

- 2.1** That the School Place Planning Strategy 2014-18 be approved, circulated to all schools and relevant stakeholders and made available on the council's website.
- 2.2** That approval be given to progress development of the following schemes proposed for adoption within the council's school expansion programme as set out in paragraph 4.0, and that a subsequent report be submitted to Cabinet for approval of fully detailed and costed schemes.

- Byron Court Primary School– 2 form of entry expansion
- Leopold Primary School – 2 form of entry expansion using the Gwenneth Rickus Building
- Oakington Manor Primary – 1 form of entry expansion

The subsequent report to include an updated cashflow position for the School Expansions Programme to take account of the strategy's approach to providing school places in Brent.

- 2.3** That the following school amalgamations be agreed in principle, subject to formal agreement by governing bodies and formal consultation and decision-making processes as set out in paragraph 5.1:

- Lyon Park Infants and Juniors Schools
- Carlton Vale Infants School and Kilburn Park Juniors School
- Malorees Infants and Juniors Schools.

2.4 That the council seeks to retain the designation of The Avenue site for education purposes as set out in paragraph 6.1.

3.0 Detail

3.1 As Members are aware, it is the council's statutory duty to ensure it can offer a school place to every child who applies. Earlier in 2014, partly as a result of the emerging recommendations of the Education Commission, it was decided to revise the school expansion programme last approved in August 2012 and to adopt a more strategic approach, ensuring that the resulting programme meets projected demand and reflects current priorities.

3.2 This new strategy has been underpinned by a commitment to improving the educational outcomes of all children and young people in Brent and links school organisation and expansion to school improvement. It sets out a draft set of aspirations as follows to underpin the strategy:

- All Brent schools should be good or outstanding
- All Brent schools should be part of a 'family of schools' which promotes resilience, mutual support and improvement
- 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
- Meeting the needs of children with special educational needs and disabilities should be central to our vision for education in Brent
- We should make efficient use of resources.

3.3 The strategy discusses each of these aspirations in turn and how they might be realised and proposes a set of principles which will be used to determine decision-making on future schemes, whether expansions (temporary or permanent) or new build. It also draws out some key actions and these are summarised in short action plan which is attached to the strategy as Appendix 0. These actions will be built into departmental plans and the Regeneration and Growth and Children and Young People Departments will then continue to use the council's project management methodology to deliver the school expansion schemes.

3.4 The strategy includes both a summary of demand for school places and a more detailed account of the methodology and demand (for primary) by planning area. This is in order to provide Members with an accurate position of the total school place demand and capacity. The strategy is deliberately cautious in assuming that while existing and planned temporary/bulge classes

will work through the system, given the reliability of predicted increases in school rolls, future expansion should be provided as permanent capacity as the educationally preferable route.

- 3.5** The strategy provided with this report is based on the provision of permanent primary school capacity from 2015-16 academic year onwards although potential temporary requirements for September 2015 will need to be assessed in a report to Cabinet in December 2014. The strategy does outline how additional temporary capacity could be created if projections were to change and additional places be required at shorter notice, recognising that even within an overall upward trend, there can be fluctuations.

4.0 Additions to the school expansion programme

- 4.1** The list of primary school schemes set out in the strategy in section 6 consists mainly of schemes already adopted as part of the School Expansion Programme agreed in May 2012. It also includes however three primary school projects which have not yet been adopted as proposed schemes by the Cabinet. It is proposed that these are adopted as part of the programme in order for officers to progress the further development of these proposals. A subsequent report will be submitted to Cabinet for approval of fully detailed and costed schemes. In the event that having developed the detailed proposals covering funding and other prerequisites, the business cases for these proposed projects cannot be approved by the Schools Capital Portfolio Board then the subsequent report will present alternative proposals.

School	Detail	Additional Forms of Entry	Proposed date
Byron Court Primary	An outstanding school which is also a Teaching School. Governors have agreed the proposed expansion.	2	2015
Leopold Primary (Gwenneth Rickus Building)	A good school which is currently running a temporary annexe in GRB. The governing body has not yet agreed permanent expansion using the annexe.	2	2015
Oakington Manor Primary	An outstanding school which has been part of a successful federation with Furness Primary School. Governors have agreed expansion in principle.	1	2015

- 4.2** Initial indicative costs have been set at £19.8m to deliver the above schemes, but these estimates will be subject to further development of scheme plans and site suitability and condition surveys.
- 4.3** In the case of Leopold Primary School, agreeing to permanent expansion would necessitate a decision that the Gwenneth Rickus Building remains in educational use. This would be subject to a further Cabinet report described above.

5.0 School amalgamations

5.1 The Strategy also sets out the principle that separate infants and junior schools should be amalgamated, although it is clear that this will be done in partnership with the governing bodies and either when the opportunity presents itself, for example a headship vacancy or when there is an expansion or rebuilding scheme. This report seeks the Cabinet's in-principle support (subject to statutory consultation and later decision-making) to the amalgamation of the following pairs of infants and junior schools:

- Lyon Park Infants and Juniors (already operating under one headteacher)
- Carlton Vale Infants and Kilburn Park Juniors (subject to agreement on a suitable shared site for an expanded school as part of the South Kilburn regeneration programme)
- Malorees Infants and Junior Schools (subject to agreement by the governing bodies of both schools to amalgamation and expansion).

6.0 The Avenue education site

6.1 A further school development opportunity is The Avenue site, a former school site in Brondesbury which is owned by a developer. It is currently designated for education use (in planning terms) and it is intended to make the case for this designation remaining since the site would lend itself to use as a new special school or annexe to an existing special school. There is a projected need for SEN school places and this site could provide an opportunity to ensure more places can be provided to Brent children in borough rather than risk relying on independent placements.

7.0 Consultation

7.1 The draft strategy was sent to all schools, both headteachers and chairs of governors as well as other partners, and was included in the termly governors' briefing so that each governing body could discuss it. It was a major issue for discussion at the Annual Governors' Conference and has also been raised by officers with individual governing bodies where the opportunity arose. It was placed on the council's consultation portal to attract wider community attention. The teacher trades unions have had the opportunity to read, discuss and comment on the report.

7.2 It is fair to say that there were few written responses to the draft strategy but awareness of it is high. The key issues to emerge in the consultation were:

- Anxiety about the intention to amalgamate separate infants and juniors schools, not so much issues of principle but more a fear that schools will be 'steamrollered'
- A support from existing schools for addition of permanent capacity, given the challenges in running temporary provision
- Support for a continuing consensual approach with governing bodies

- An acceptance from headteachers that there needs to be shared ownership of the challenge posed by the growth in pupil numbers.

8.0 Financial implications

- 8.1** Since the 2011/12 financial year, the council has received £135.98m Basic Need Capital Grant allocations from central government to provide school places, as follows:
- 2011/12 to 2013/14 Basic Need Grant Received - £91.16m
 - 2014/15 to 2016/17 Basic Need Grant Allocated - £40.95m
 - 2013/14 Targeted Basic Need Grant Allocated - £3.87m
- 8.2** A further £11.11m has been secured through S106, school and diocesan board contributions and the council's own capital programme, as follows:
- Council Contributions - £3.64m
 - School/Diocese Contribution - £0.75m
 - Unsupported Borrowing (funded by Dedicated Schools Grant) - £1.3m
 - S106 Funding - £5.42m.
- 8.3** A total of £19.23m has been spent on both temporary and permanent school places to the end of the 2013/14 financial year from these funding sources. A further £87.16m has been committed to the delivery of schemes adopted as part of the School Expansion Programme agreed in May 2012.
- 8.4** The current forecast costs within the School Expansions Programme cashflow includes the sum of £12.05m for the delivery of a second phase of SEN schemes to deliver an additional 112 places. The provision of future years SEN places is not included within this Strategy.
- 8.5** Predicting the future costs of providing school places remains inherently difficult to forecast, particularly as currently construction costs are rising at a rate significantly in excess of inflation. However, on the basis of the initial indicative costs of £19.8m for provision of the schemes proposed for adoption, these are affordable within the current levels of secured funding sources. This position will be reviewed when the detailed proposals covering funding and other prerequisites have been developed.
- 8.6** The council's ability to fund further schemes beyond those proposed for adoption will be dependent upon the remaining levels of secured funding and future allocations of Basic Need Grant funding. There is ongoing work to identify and secure additional funding sources for the future requirements of this programme.
- 8.7** The strategy includes details of proposed free schools for the borough that will potentially provide a total of 10FE primary school places and 9.3FE secondary school places in the 2014-18 period to be funded directly by the Education Funding Agency at no cost to the council. There is risk to the council that if all of these places are not provided via this route that the council will need to provide places and fund the associated expenditure.

- 8.8** There is no provision currently made for costs that may be associated with The Avenue Education Site referred to at paragraph 6.1. It should be noted that Basic Need grant funding cannot be utilised for the acquisition of land.
- 8.9** The revenue funding for schools is based on an annual census of pupil numbers, in line with the National Funding Formula. If, at the request of the local authority, a school takes on additional pupils, bulge classes, expansions and new provision in satellites after the census has been taken, the school will receive funding from the council's Dedicated Schools Grant (DSG). This funding is for a full class for the remainder of the financial year and the following financial year and has been put in place to ensure that schools are not adversely affected by agreeing to expand. The funding has been set at differing rates dependent on the nature of the expansion, where schools will receive £3,300 per pupil or £3,600 per pupil if they are placed in an annexe or off site building to the school. The funding model and budget for expansions is agreed by the Brent Schools Forum on an annual basis and has been accounted for within the DSG deficit recovery plan, which is due to breakeven in 2014/15.

9.0 Legal implications

- 9.1** Under sections 13 and 14 of the Education Act 1996 (as amended by the Education Acts 2006 and 2011), a local education authority has a general statutory duty to ensure that there are sufficient school places available to meet the needs of the population in its area. The local authority must promote high educational standards, ensure fair access to educational opportunity and promote the fulfilment of every child's educational potential. It must also ensure that there are sufficient school places in their area and promote diversity and increase parental choice. To discharge this duty the local authority has to undertake a planning function to ensure that the supply of school places balances the demand for them.
- 9.2** As a contingency, to support the admission to school of children as quickly as possible, the In Year Fair Access Protocol allows for the admission of children over schools' planned admission numbers in the event that a school place is not available. Schools are not required to maintain classes over the planned admission number but revert to the usual admission number when children leave.
- 9.3** Statutory proposals are required for a proposed enlargement of the school premises that would increase the capacity of the school by both more than 30 pupils and 25 per cent or 200 pupils (whichever is the lesser). Proposals may also be required for some cumulative expansions and a review of any other enlargements that were made without the need for statutory proposals would need to be made before determining if statutory proposals would be required.

- 9.4** This means adding those enlargements made:
- in the 5 year period that precedes the proposed expansion date
 - since the last approved statutory proposal to enlarge the school (within this 5 year period)
 - exclude any temporary enlargements (ie. where the enlargement was in place for less than 3 years)
 - add the making permanent of any temporary enlargement.
- 9.5** Under current admissions code children can be admitted above the Published Admission Number (PAN). For community/voluntary controlled schools the LA as admission authority must consult the Governing Body of the school where it proposes to either to increase or keep the same PAN.
- 9.6** Under Section 19 of the Education Act 2006 and School Organisation Regulations the authority can decide to propose an enlargement, follow the statutory process and resolve to do without requiring consent of Governing Body whose redress would be to object to the schools adjudicator.
- 9.7** With schools increasingly being outside local authority control, such that they own their own land, a number of the projects outlined in this report may involve the council managing building projects on land that it does not own. Where necessary, the council will enter into agreements with the school/s which will give the council a licence or lease to build, also recognises the council's project management role and the school's right to review key stages of the works.
- 9.8** Even with community schools running satellite sites, consideration should be given to the governing body of the school having an agreement or licence for the council premises forming the satellite site. Although community schools do not own their own land and have only an implied licence of the main school sites, it may be sensible for a written licence to be in place for the satellite site to make the clear maintenance and repairing obligations.
- 9.9** Given there is a presumption that any new school site provided by a local authority would be for a sponsored academy, a local authority would in general be expected to be grant a 125 year lease at a peppercorn rent to the academy. This approach is intended to be consistent with the existing guidance on community schools converting to academies where a local authority grants to the new academy a 125 lease of the community school site at a peppercorn rent. If in the alternative a local authority is asked by the Department of Education to provide a new site for a free school it would also be expected to grant a peppercorn lease to the free school in accordance with Department of Education Guidance updated January 2014.
- 10.0 Diversity implications**
- 10.1** The strategy aims to address equality issues around social disadvantage and disability. This was tested during the consultation period and is reflected as far as possible in the final proposals. An Impact Needs/Requirement Assessment (INRA) has been prepared.

11.0 Staffing/accommodation implications (if appropriate)

None specific to this report

Background Papers

Consultation responses and notes of meetings.

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**LONDON BOROUGH OF BRENT
PLACE PLANNING STRATEGY - 2014-18**

Final Version

October 2014

1. Introduction

This strategy sets out our approach to providing school places in Brent. It builds on the work undertaken over the last eight years to expand school provision in the borough, in particular the plan set out for the expansion of primary provision in August 2012. This strategy however establishes a wider set of principles and objectives for the organisation of schools and has therefore been subject to wide consultation and discussion and across stakeholder groups.

The draft strategy was signed off in March 2014 for consultation with schools, including headteachers and governing bodies during the summer term. In particular it was the subject of a session at the governors' conference and individual governing bodies were invited to respond. The teacher trades unions also contributed their views. In response to the issues raised by consulted, the final version of the strategy has appropriate amendments incorporating those points or aims to address the issues raised.

2. Context

The context for this strategy is one of:

- **Rising demand for school places.** The projected numbers are set out in Section 6 of this report but the backdrop is an overall increase in population due to housing developments, in-migration and rising birth rates. In the Census, between 2001 and 2011 the number of under fives in the borough increased by 37.7 per cent. Brent therefore has one of the youngest populations in the country, with 28.8 per cent of the population being under 18. The local authority has managed to keep pace with demand for primary school places (where the main pressure has been) but only just, resulting in delays in accessing school for small numbers of new entrants to the borough and in some parents having to transport pupils to schools across the borough when local schools are full. This report demonstrates that the need for school places will continue to grow.
- **Changing composition of the population.** Brent has one of the most diverse populations in London, with over 140 home languages currently recorded among our school children. This diversity is not a fixed picture but rather there are rapid changes to the population. For example, schools in the north of the borough where as many as three quarters of the pupils were of Indian origin a few years ago would now see a much lower percentage, with increased proportions from eastern European groups. Since 2008 the number of Romanian pupils has increased from 96 to 1060 pupils. The population is mobile, with nearly 2400 school age children across primary and secondary arriving in-year during 2013.
- **Increasing population density and a limited supply of land.** In common with the rest of London, population density in Brent is increasing, land values are high and there are a number of competing pressures for such land as is

available. In 2011, over a quarter of households were recorded as being overcrowded. While there is still a 'north south divide', with the schools in the south of the borough generally being on much smaller sites, inner city phenomena such as congested streets and multiply occupied homes are moving northwards. The extent of planned and anticipated housing developments indicates that the density of the borough will only increase.

- **High aspirations, often in the context of deprivation.** While the proportion of pupils in our schools who qualify for the pupil premium is about average for London, using broader demographic data the borough is in the top 15 per cent of the most deprived areas of the country and using the current means of measurement, around a third of children live in poverty. While adult skills levels are low – 25 per cent have a NVQ level 4, compared to 38.6 per cent across London – both the more established and emerging communities in Brent place a high value on education and rightly see their children's education as a key part of the path to prosperity for their family. The highest performing Brent schools show that social disadvantage is no barrier to high achievement, but the context of high mobility and deprivation can be challenging for schools.

As at September 2014, Brent's schools are organised as follows:

All-through 3 to 18	Primary				Secondary	Special
	3-11	Nursery	Infants	Juniors		
2	44	4	8	8	13	4

In terms of their status, this breaks down as follows:

Status	Community	Voluntary aided	Foundation	Academy	Free
Primary	39	19	3	3	0
Secondary 11-18	0	3	0	9	1
All-through 3 to 18	0	0	0	2	0
Special	3	0	0	1	0
Total	42	22	3	15	1

This is a fast changing picture, with Wembley High Technology College due to become all through in September 2015. In addition there are up to three 'free schools' opening in the borough in September 2015.

3. What are the council's duties in relation to school place planning?

While schools themselves are increasingly autonomous and the government plays a direct role in the establishment and running of academies and free schools, the council retains the statutory responsibility to ensure that there are sufficient school places available for all Brent children and young people who need one. It retains too the duties set out in the Education Act 1996 to promote high standards and ensure equal access. The council has overarching responsibilities for school admissions, co-ordinating admissions at reception (age four) and at secondary transfer (11 plus), aiming to meet parental preference.

In addition to securing school places for pupils aged five to 16, the local authority has related statutory responsibilities in relation to:

- **Children and young people with special educational needs and disabilities (SEND)** where the council has to make suitable provision to meet their needs
- **Early years provision**, where responsibility for childcare sufficiency and for provision for three and four year olds as well as children's centres overlaps with school provision
- **Post 16 education and training** where the council leads the local 16 to 19 partnership and takes overall responsibility for sufficiency and suitability of provision.

Under current legislation, while it is not possible for the council to build new community schools if the council were to identify a suitable site for a new school, it could use one of the following two routes to establish a new school:

- The **academy presumption** route whereby the council would put forward a school proposal which it could advertise and promote to potential academy sponsors. Under this route, the council would supply the site and use its own capital to build the school;
- The council could 'support' a **free school** promoter to apply to the DfE to build a school on a council site. The decision would be entirely at the discretion of the DfE, but experience elsewhere indicates that council-backed schemes are more likely to succeed.

In respect of community schools only (so not for academies, foundation or voluntary aided schools), the local authority has the power to instruct schools to expand. This is not a power that this local authority has exercised hitherto and our aim is to work collaboratively with schools at all times.

4. What are our aspirations for our schools in Brent?

It is important to put the development of new school places into the context of a set of wider aspirations for schools in the borough. As background, Appendix 1 maps out the objectives set out in the council's existing plans:

- The Brent Borough Plan
- The Plan for Children and Families in Brent 2012-2015.
- Brent Strategy for Special Educational Needs and Disabilities (SEND) 2013-2016.
- Early Years and Childcare Strategy 2013-2016.
- Brent 14-19 Partnership Statement of Priorities 2014.

In establishing our plans for increasing the supply of school places, we will remain in line with these plans but have also established more specific aspirations as follows to inform our action and decision-making:

Our Aspirations

- All Brent schools should be good or outstanding
- All Brent schools should be part of a 'family of schools' which promotes resilience, mutual support and improvement
- 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
- Meeting the needs of children with special educational needs and disabilities should be central to our vision for education in Brent
- We should make efficient use of resources

Each of these aspirations is explored in detail in the next section, translating into both **principles** to inform our future decision-making and **actions** to improve and enhance our planning.

5. The principles of the strategy

All Brent schools should be good or outstanding

Currently the Ofsted ratings of our schools are as follows:

Ofsted Grade By Proportion	Outstanding (1)		Good (2)		Requires improvement (3)		Inadequate (4)	
	No.	%	No.	%	No.	%	No.	%
Nursery	1	25.0%	1	25.0%	2	50.0%	0	0.0%
Primary	12	19.7%	37	60.7%	8	13.1%	2	3.3%
Secondary	4	28.6%	6	42.9%	1	7.1%	2	14.3%
PRU	0	0.0%	2	66.7%	1	33.3%	0	0.0%
Special	1	25.0%	3	75.0%	0	0.0%	0	0.0%
ALL	18	21.4%	49	58.3%	12	14.3%	4	4.8%

In comparison to the rest of London and England:

Primary %	Outstanding	Good	Requires Improvement	Inadequate
England	18	60	19	2
London	20	65	14	0
Brent	20	60	13	3

Secondary %	Outstanding	Good	Requires Improvement	Inadequate
England	24	48	24	5
London	37	50	11	2
Brent	29	43	7	14

These tables show that 80 per cent of primary schools and 72 per cent of secondary schools are good or outstanding. While Brent schools are at or above the national rate, this overall picture does not compare well with other London boroughs including our statistical neighbours and those with higher levels of social deprivation.

We want all pupils to experience an education that is good or outstanding. While the approach to achieving this centres on school improvement, the way that schools are organised and planned is important in 'building in' success. The way that schools are organised has important implications for how they can provide education in terms of curriculum, staffing and care. There are significant benefits from larger schools in terms of recruitment and retention of staff, with larger primary schools able to afford a better career structure and the school may move up to higher 'group' for salary purposes. This is particularly important given the challenges currently experienced in recruiting primary headteachers. There is also evidence that London-wide school standards have improved during a period of rapid expansion and increasing average school size. It is the case however that both temporary and permanent expansions, with the building works and staffing changes that accompany them, are a challenge for any school to manage, particularly one which is implementing a demanding improvement plan. Even a school which is good may be vulnerable if it has a change of headteacher or, say, a deputy who has long term illness. These are all arguments in favour of only expanding good or outstanding schools. There does however need to be a degree of pragmatism as a major building scheme of which expansion is part may be an essential part of the school's improvement journey, as with ARK Elvin and Alperton.

Principle 1: We will only undertake expansions with good or outstanding schools where leadership is secure.

All Brent schools should be part of a 'family of schools' which promotes resilience, mutual support and improvement

The local authority has to be realistic about the limits on its powers and resources to support and improve schools as well as recognising that expertise and knowledge rests mainly in schools themselves. Across the country, school-led models of school improvement and support have been developed, informing the establishment in 2013 of the Brent Schools Partnership. Part of a more school-led approach can be to harness school organisation changes such as amalgamation and federation to both provide additional places and to provide a fast track to improvement, thus opening up the possibility for schools which are not good or outstanding to become part of wider expansion schemes.

Currently, Brent only has one hard federation between primary schools: The headteacher of the outstanding Oakington Manor School was appointed executive headteacher for a second, failing school Furness School. The federation has been successful and Furness has since been judged by Ofsted as no longer inadequate. There has also been a successful short term soft federation whereby Byron Court Primary School has supported Oliver Goldsmith Primary. This approach has been used much more extensively in other authorities and it recognises that the knowledge, skills and experience involved in taking a primary school to outstanding and in turning around a school with challenges are in short supply. This federated model is particularly valuable where there are small one form of entry schools which can struggle with financial viability on their own and which may face particular problems with recruitment and retention of senior staff.

Principle 2: We will promote federations between primary schools, both to address quality issues and to address the future viability of one form of entry schools

The federated model can also be extended to a school operating an off-site annexe either on a temporary or permanent basis. This allows an outstanding school's 'brand' to be extended, even where their site does not allow additional accommodation. This model also makes expansion of some schools to 4 and even 5FE seem less daunting, since the research shows for these schools that the quality of the leadership and management is far more significant for the success of the school than the size.

Principle 3: We will actively consider two-site schools and 5FE schools where there is leadership and management capacity

Where a large and successful primary school is also an academy, it can apply to be a sponsor for another existing school or for a new school. This could provide a local solution for schools which experience problems as well as providing an opportunity to have local sponsorship of a new school, thus providing a sponsor with a local track record of success in the Brent context.

Principle 4: We will develop local capacity to sponsor or promote new schools, working with academies in the primary sector

Brent still has eight sets of separate infants and junior schools. Of the 16 schools, seven are good and eight outstanding, so in Brent they are among our more successful schools. Notwithstanding this, through primary schools are increasingly the norm across the country and generally accepted as a better model, more efficient and with better transition between Key Stages 1 and 2. It makes sense for Brent to have a more explicit policy in favour of amalgamating infants and junior schools where the opportunity arises (for example, when a headship vacancy arises or where a building scheme is planned). An amalgamation requires a formal process which includes consultation and requires discussion with the governing bodies in the first instance.

During consultation on this plan, the amalgamation of separate infants and junior schools was the issue that caused the most anxiety and concern because of its potential impact on staff and governors. While there were no arguments of principle made against moving to through primary schools, schools rightly wanted assurance that there was not going to be a 'steamroller' process of change with schools being 'done to' but rather a respect for the individuality of schools' positions in terms of improvement, staffing, buildings and other issues.

Principle 5: We will work towards the amalgamation of separate infants and junior schools

Another important development in school organisation is the advent of 'all through schools'. In effect, this means a primary school is co-located and co-managed with a secondary school, providing part of the secondary school's intake. There are

currently two operating in Brent with a third opening in September 2015. The number of all through schools in England has doubled since 2009 (there are now 26 across the country) and the present Schools Commissioner is promoting the model. It would however make sense in Brent to assess the effectiveness of the current through schools over the next two academic years rather than going further down this road at the present time. Site availability at good or outstanding secondary schools is limited.

Principle 6: We will not currently seek to develop more all-through schools

The council and schools should work together to meet the challenge of providing sufficient school places

The council has hitherto taken a pragmatic approach to setting out its plans for school places, meeting need just ahead of or when it has arisen. Council officers have negotiated individually with schools on expansions with the result that some schools have taken both temporary and permanent additional classes while others have not, despite having the physical space. For community schools (not voluntary aided schools nor for academies), the council has the power to direct a school to expand. It has no wish to use this power, preferring to work in a consensual way. However, to secure places in Brent schools for all children who need them, such a direction cannot be ruled out.

The council also has the power to direct schools to take pupils over numbers using the Fair Access Protocol. The aim is not to use this as a routine solution for school place shortages (as it is in some other boroughs), but rather the aim is to retain class sizes of 30 and only use the Fair Access Protocol in exceptional circumstances.

Under previous legislation, the council was required to have a 'school organisation committee' on which schools (headteachers and governors) were represented and which discussed overall plans and specific proposals for school expansions, openings, closures etc. While this was cumbersome, a partnership model for working with schools on this most challenging and contentious of developments would give the expansion plans greater authority and provide greater transparency for schools rather than being developed by council officers and members in a 'black box'. A new joint board could be established involving a cross section of school representatives, officers and members. One model, as used in another London borough, would involve appointing an independent chair to act as an 'honest broker'.

Action 1: The local authority will establish a joint body with schools which oversees school place planning and school organisation, monitors the impact of the plans and programmes and makes recommendations to the council, diocese or DfE.

Schools should operate in good quality, safe premises

School expansion work has provided the opportunity both for high quality new accommodation and to address pre-existing site and building issues to support an

overall improvement to the way in which the expanded school is able to function. We will continue to do this wherever possible and where financial constraints allow. This could include for example changing the size and location of a school entrance as was achieved at Park Lane Primary to enable expansion and better functioning of the whole school. We need to balance a drive to reduce cost with the need to value good design and building school premises which will last for the future. Some schools are now paying the price for poor school building standards in the sixties and seventies. We do not want to repeat those mistakes.

Where schools have urgent condition or health and safety related issues that would ordinarily be addressed through the Asset Management Programme, a co-ordinated and flexible approach will be adopted to ensure efficiency in completing all works.

While we are committed to meeting current government guidance on space requirements, including for outdoor play, on our smaller sites we may have to develop roof top play and other creative space uses as we have done in the expansion scheme at Harlesden Primary School.

Principle 7: We will expect expanded and re-structured schools generally to meet government guidance on space standards but be prepared to consider innovative design solutions to achieve this.

Schools face challenges during construction periods, but council project managers, the contractors, school improvement staff and the education health and safety manager are all experienced in supporting schools safely through this time.

Principle 8: We will seek to minimise disruption to schools during expansion and support school leaders to manage the challenges.

Children should be educated close to home

Most families want a primary school close to their home, ideally within 'buggy-pushing distance'. The benefits of this are obvious in terms of promotion of walking and reduction of car traffic as well as for social cohesion. It also has benefits for working parents who may have time constraints. For this reason, we should continue to plan primary places using 'planning areas' accepting that in order to make efficient use of resources this may mean pairing up neighbouring planning areas to ensure there is not an over-provision of places across the borough. These areas (shown in the map at Appendix 2) were drawn up some years ago but are still valid, using major roads (such as the North Circular) as boundaries.

Principle 9: We will continue planning primary places using planning areas.

It is clear that some areas will have particularly rapid growth in population over the next few years. The council's Core Strategy was adopted in 2010 and identifies the five Growth Areas in Brent. Each Growth Area will generate new housing and increase the population. The table below shows the number of new homes planned for each area between 2007-2016 and 2017-2026. At least 25 per cent of new homes should be family homes with 3 or more bedrooms.

Growth Areas	2007-2016	2017-2026
Wembley	5,000	6,500
Alperton	1,500	100
Burnt Oak/Colindale	1,400	1,100
Church End	700	100
South Kilburn	1,400	1,000
Rest of the borough	2,050	360
Total	12,050	9,160

Child yield predictions have tended to assume that one and two bedroom properties house only singles and couples without children. During the consultation it has been suggested that increasingly these smaller properties, whether social housing or not, are increasingly occupied by families. We will therefore review the child yield estimates before they are fed into the next set of GLA roll projections. Clearly the other side of the coin is that if economic circumstances change and development does not materialise the yield will be lower.

Action 2: We will understand in a more sophisticated way the patterns of living in Brent so that we can more accurately predict the numbers of children yielded by new housing developments.

As part of its planning of communities, Brent has several major regeneration schemes. A number of these (Stonebridge, South Kilburn, Oriental City and Wembley Park) have the planning of school places as an integral part. It is vital that this approach continues if school places are to be available and accessible to the new communities created.

Principle 10: We will as far as possible incorporate proposals for additional primary school places into new regeneration schemes.

In some geographical areas of the borough where land is very scarce and existing schools are on constrained sites it may be that will remain a structural shortfall of places. If this is the case, we will explore what measures are available via admissions policies to avoid particular residential locations being unduly disadvantaged.

Action 3: We will use the annual review of school admissions policies to improve availability of school places for families in Brent.

Out of Brent's 64 primary schools, 20 are voluntary aided and these tend to draw pupils from wider distances. The Jewish voluntary aided schools in Brent have very

low percentages of Brent residents. It would not be appropriate to consider these schools for expansion. The Roman Catholic and Church of England voluntary aided schools form, however, a significant proportion of our 'good and outstanding' schools and therefore of those eligible to expand. Brent children predominate on their rolls. The rising numbers among Eastern European communities and those from Brazil, Goa and the Philippines seem to be boosting demand for Christian ethos schools so it makes sense to consider the RC and C of E schools alongside community schools, recognising that the respective Diocesan Boards would need to be key partners.

Principle 11: We will consider expanding voluntary aided schools only where there is local Brent demand, working with the relevant partners.

Usually children travel independently to secondary school, so for planning these places, bus and tube routes are more relevant. The effect of diversity (voluntary aided schools, single sex schools) is so great that we will continue to plan secondary school places on a whole borough basis. Given a concentration of secondary school places in one area of the borough (Wembley), work will be done with schools to consider extending the approach used by ARK Wembley which has a second catchment 'node' for admissions in the south of the borough (see Principle 13 above).

The import and export figures in Appendix 3 show that increasingly Brent residents are choosing secondary schools outside the borough. The imports into the Jewish faith schools mask a high level of exports for Christian and community schools. The secondary transfer statistics also show that the lowest performing secondary schools are unpopular. Unfortunately, three of our secondary schools are currently inadequate, while one further school has GCSE results above the floor target but below 50 per cent five plus A* to C including English and maths. The council has taken radical action in transferring one inadequate school to the successful ARK chain (ARK Elvin), while with the two sponsored academies, the council is working with the sponsor and the DfE to hold them to account and ensure that these schools improve rapidly.

Principle 12: We will continue planning secondary school places on a borough wide basis with the ambition to make Brent's secondary offer attractive to all parents.

Schools should work with the local community

Schools are a vital part of community infrastructure. Increasingly, they are the only community buildings in many areas so varied community uses are important for example many of our schools serve as places of worship and supplementary schools at the weekend. The council's ability to intervene on behalf of those wanting access to school facilities is limited but anecdotally, the community usage of Brent schools seems to be reasonably high and not a subject of complaints. The council supports the expansion of community benefits and use of school buildings particularly where investment is made in these communities.

Principle 13: We will consider how community benefits from school facilities can be maximised when we expand or build new schools

Community benefits, both access to local school places and ancillary benefits from community use go alongside disbenefits such as traffic congestion and parking problems, the main complaints and anxieties raised by local residents faced with planning applications for school expansions and new schools. The council has well established approaches through its planning and traffic teams both to having a meaningful dialogue with residents and to minimising the negative impacts. It is important that these approaches continue and develop.

Principle 14: We will consult with local communities as part of the planning process to minimise/mitigate the impact of new school developments.

Children with special educational needs and disabilities should be a central part of our vision for education in Brent

In partnership with schools, the council has succeeded in rapidly increasing in-borough provision for pupils with SEN. This has had the benefit of improved educational quality, less travelling, better continuity and better involvement in the local community, as well as better use of resources.

There are now a total of 525 places in four special schools, with an additional 65 places planned. The schools are all good or outstanding and one is a Teaching School. They also offer excellent examples of partnership with mainstream schools. There are also seven sets of 'additionally resourced provision', two in nursery, two in primary and three in secondary. As of January 2014, there are 526 pupils with statements of SEN attending mainstream schools, 372 in Brent schools and 154 in out borough schools therefore around half of our pupils with statement are in mainstream schools.

While the numbers of children with SEN and with disabilities are projected to increase, the existing special schools can provide a core provision and resource while developing a stronger 'hub and spoke' model with mainstream schools. This approach would build on the recently developed partnership between Alperton and Woodfield Schools whereby the young people begin Key Stage 3 in special school and are prepared and helped to benefit from a supported mainstream education in Key Stage 4. This experience points to the need to identify options for more inclusive provision as part of expansions and new schools, provision which draws on the expertise and specialist provision in our secondary schools. The pupils attending outborough special schools are mainly in the upper year groups and as they leave, the number will decrease. There are however certain areas of provision which currently can only be accessed in the independent sector. West London Alliance is working on this since establishing new special schools is extremely costly and planning of provision could be better done on a sub-regional basis.

A former school site in The Avenue is owned by a developer and is currently designated (in planning terms) as an education site. Its size and location would be ideal for a new special school or an annexe to existing provision. It is proposed to seek to maintain the current designation and work further on options for the site.

Principle 15: We will build inclusive provision into expansion and new school proposals and work with neighbouring on the planning of special school places

It will also be necessary to invest in improved physical accessibility for disabled pupils as currently wheelchair accessibility is limited across our stock of school buildings and we need to review this to ensure that our schools are meet modern disabled access requirements. .

Action 4: We will improve accessibility for all pupils, ensuring that all our schools are physically accessible.

We should make efficient use of resources

The available capital resources are not sufficient to meet fully the demand for school places. This detail is set out in section 7. The council (alongside other local authorities) is under pressure to bring down the cost per place of new provision in line with the government's current expected rates for school building projects which are approximately 30 per cent lower than the rates applied in the Building Schools for the Future programme and much lower than the cost of recent Brent projects. The procurement of works on school building projects is also currently adding further challenges to the efficient use of resources. A more strategic approach to the procurement of works and to the allocation of funds to projects is therefore being developed.

A number of educational criteria have already been set out for determining whether a school scheme should go ahead. Beyond educational criteria, value for money and risk around timely delivery should also be used in decision-making.

Principle 16: After assessing educational suitability, schemes for expansion or new schools will be judged in terms of value for money and deliverability

It has already been noted that land for new schools, annexes or extensions is very scarce in the borough. In addition, the capital resources available cannot be used to buy land, so any sites would have to be able to be acquired without capital or revenue cost to the council. The site would also have to be large enough to meet current guidance on outdoor play space and be in a location either in an area of need or on a good public transport route to that area. Where sites are available, there is a high opportunity cost to using them for school purposes, in terms of forgoing a potential capital receipt or other uses such as housing.

If the need for additional places in the borough is met by free schools this has the advantage of reducing the call on council capital spend since the EFA will meet the cost of construction. The council's Executive agreed in August 2012 a set of criteria for working with a free school partner. These are attached as Appendix 4. Where a site is identified as available and appropriate for a new school, a suitable promoter for a free school could be sought, using the criteria and informal selection, with a strong focus on quality. This approach has been used in a number of London authorities, including Ealing, and can be used for the sites which are coming on stream in Brent.

Action 5: Where a site is identified, we will seek a partner who could apply to the DfE under the free school route, using the criteria already agreed by the council.

It is also important to consider the impact of capital works on revenue costs. In general the addition of new buildings to existing schools will bring down average revenue costs because they tend to be more energy efficient. Revenue costs are however an important consideration for annexes where additional costs such as premises management may arise so that any such permanent arrangements will need to have detailed business plans attached.

In addition, for new schools these should be at least two forms of entry in terms of both value for money of the initial build (cost per place) and in terms of future financial sustainability.

In the majority of year groups in Brent we have very few vacancies (less than one per cent). Current DfE guidance is to retain five per cent surplus places to facilitate parent choice. In Brent however we have not had an explicit policy on surplus places in recent years. It is proposed that our new strategy should attempt to build this in in order to provide flexibility offer parental choice and cope with demand beyond that projected. The maximum capacity proposed in this strategy (i.e. sufficient to meet all projected demand) is 4592 places in each year group – a total of 32,144 primary places. Five per cent of this is 1607 places or the equivalent of 26 places per school in Brent offering primary places (62). This will not necessarily be well received by schools, since the five per cent would inevitably sit disproportionately with a smaller number of lower performing and less popular schools. Brent schools now have the expectation that on national Census Day (currently in October) virtually all places will be full. This is because revenue funding is allocated to schools based on pupil numbers, so maximising roll numbers maximises funding for that year.

Action 6: We will explicitly adopt the DfE recommended five per cent surplus places to enable choice and to reduce the need for temporary accommodation.

As analysis of the roll projections in section 6 shows, projecting future demand is not an exact science. Currently, the primary projections are marginally (by less than five per cent overall) over-estimating demand, so planning future capacity based on the projections could by itself deliver something close to the five per cent surplus/ planning margin referred to above. However, as section 6 also shows, it is equally possible for the projections to err in the other direction and the match between projected and actual outcomes will need to be closely monitored so that informed adjustments to the planned programmed can be made. For this reason it will also be important to have contingency plans for temporary accommodation. These would need to be drawn from among the following possibilities:

- For primary age groups above reception, early opening of classes in permanently expanded schools so that the school fills several year groups immediately rather than filling up from the bottom. This is an educational and

logistical challenge for schools, but a better use of resources than adding new classrooms.

- Use of existing non-classroom spaces in existing schools such as ICT suites and parent rooms. These are often spaces which schools have fought long and hard to develop and retain as part of pushing up educational standards, but are spaces which have been used more extensively in other local authorities for bulge classes.
- Hold temporary accommodation modules on standby for agreed sites on schools which have space available and with agreement that the classes can be taken at short notice.

It would not be considered appropriate in Brent to impinge on nursery classes or introduce 'shifts' to double up usage of classrooms – this latter approach has been threatened by some local authorities but not actually used to our knowledge.

Action 7: We will be ready with contingency plans for temporary accommodation, given the population fluctuations in Brent.

Summary of principles:

Principle 1: We will only undertake expansions with good or outstanding schools where leadership is secure.

Principle 2: We will promote federations between primary schools, both to address quality issues and to address the future viability of one form of entry schools.

Principle 3: We will actively consider two-site schools and 5FE schools where there is leadership and management capacity.

Principle 4: We will develop local capacity to sponsor or promote new schools, working with academies in the primary sector.

Principle 5: We will work towards the amalgamation of separate infants and junior schools.

Principle 6: We will not currently seek to develop more all-through schools.

Principle 7: We will expect expanded and re-structured schools generally to meet government guidance on space standards but be prepared to consider innovative design solutions to achieve this.

Principle 8: We will seek to minimise disruption to schools during expansion and support school leaders to manage the challenges.

Principle 9: We will continue planning primary places using planning areas.

Principle 10: We will as far as possible incorporate proposals for additional primary school places into new regeneration schemes.

Principle 11: We will consider expanding voluntary aided schools only where there is local Brent demand, working with the relevant partners.

Principle 12: We will continue planning secondary school places on a borough wide basis with the ambition to make Brent's secondary offer attractive to all parents.

Principle 13: We will consider how community benefits from school facilities can be maximised when we expand or build new schools.

Principle 14: We will consult with local communities as part of the planning process to minimise/mitigate the impact of new school developments.

Principle 15: We will build inclusive provision into expansion and new school proposals and work with neighbouring on the planning of special school places.

Principle 16: After assessing educational suitability, schemes for expansion or new schools will be judged in terms of value for money and deliverability.

Summary of actions:

Action 1: The local authority will establish a joint body with schools which oversees school place planning and school organisation, monitors the impact of the plans and programmes and makes recommendations to the council, diocese or DfE.

Action 2: We will understand in a more sophisticated way the patterns of living in Brent so that we can more accurately predict the numbers of children yielded by new housing developments

Action 3: We will use the annual review of school admissions policies to improve availability of school places for families in Brent.

Action 4: We will improve accessibility for all pupils, ensuring that all our secondary schools are physically accessible.

Action 5: Where a site is identified, we will seek a partner who could apply to the DfE under the free school route, using the criteria already agreed by the council.

Action 6: We will explicitly adopt the DfE recommended five per cent surplus places to enable choice and to reduce the need for temporary accommodation.

Action 7: We will be ready with contingency plans for temporary accommodation, given the population fluctuations in Brent.

6. What is the future demand for school places in Brent?

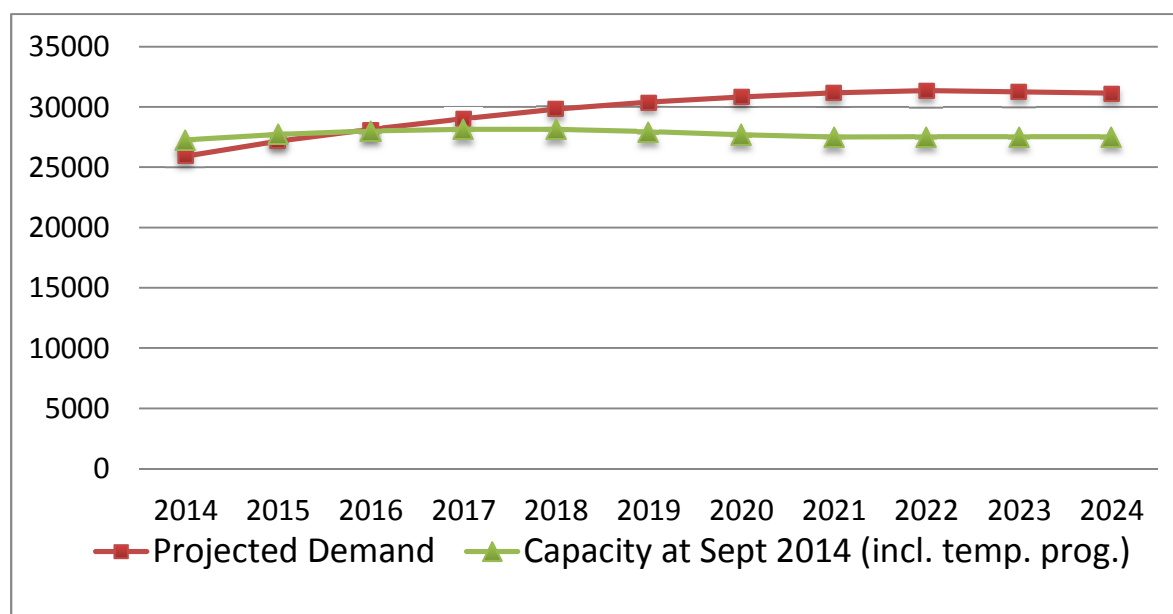
6.1 Primary projections of need

Growth in pupil population has been rapid and since 2006, 4693 additional primary school places have been created, 2130 temporary (of which 300 became permanent) and a further 2563 permanent. The list of schemes already delivered is attached as Appendix 5. The latest GLA projections are set out in Appendix 6 and 7 along with an explanation and analysis of the methodology. The implications for future planning are set out below.

6.1.1 Primary projections of need

The need for primary places is projected to increase as set out in Graph 1, which shows the shortfall if no schemes were to proceed after September 2014.

Graph 1. Total primary demand and places as planned for Sept. 2014



The total primary requirement is for the opening of 23 additional forms of entry by 2018. Set out below is a list of all the current schemes and proposals for additional school places which can contribute to meeting that requirement. It incorporates Phase 3 of the expansion programme agreed in 2012 but also includes free schools as well as proposals for making permanent the temporary use by Leopold Primary of the Gwenneth Rickus Building and proposed permanent expansions of Byron Court and Oakington Manor Schools.

Planned permanent new places for September 2015

	No. of places	No. of FE	Will be total FE
Wembley High Technology College	840	4	4
Uxendon Manor Primary	420	2	4
Elsley Primary	420	2	4
Stonebridge Primary	210	1	3
Islamia Primary	210	1	2
Malorees Infants and Juniors	210	1	3
Byron Court Primary	420	2	5
Leopold (Gwenneth Rickus)	420	2	4
Kilburn Grange (Free School)	420	2	2
Oakington Manor Primary	210	1	4
Total number of places	3,780	18	

Planned permanent new places for September 2016

	No. of Places	No. of FE
Oriental City site	420	2
Quintain site	630	3
Carlton Vale Infants and Kilburn Park (South Kilburn regeneration)	210	1
Total number of places	1,260	6

Planned permanent new places for September 2017

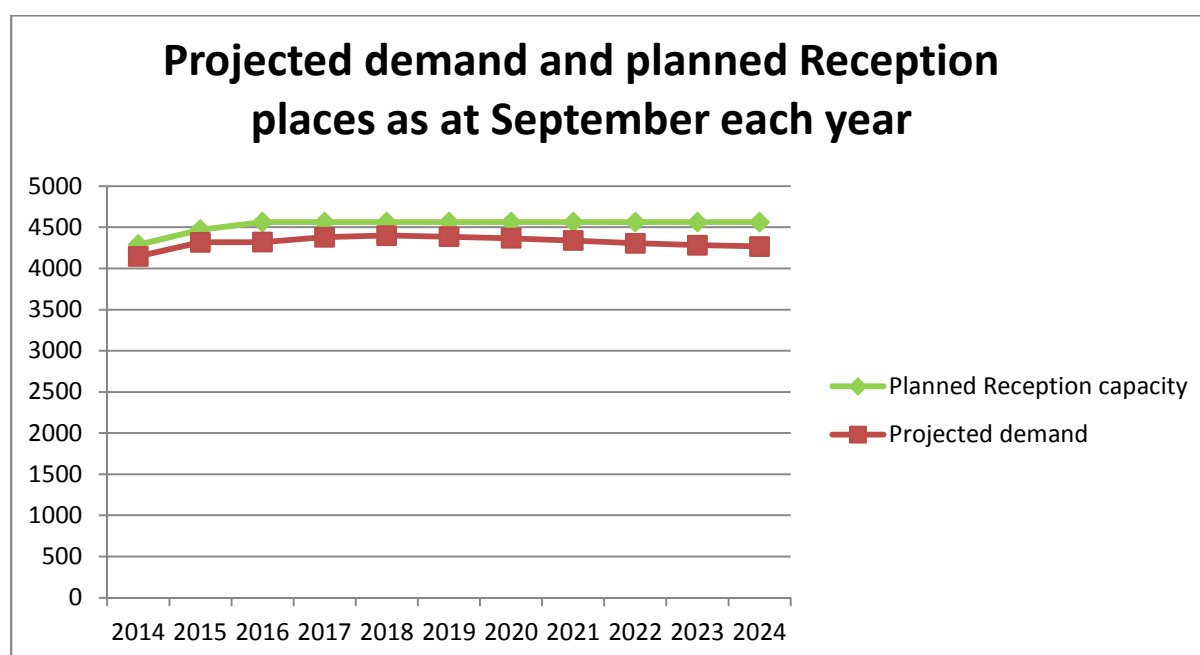
	No. of Places	No. of FE
Stanley Avenue Alpertown site	630	3

These schemes are all at very different (and mostly fairly early) stages of development and are characterised by multiple dependencies and significant risks around, for example, planning.

The schemes requiring the building of a new school on a site which is not currently a primary school (Oriental City, Quintain, Alpertown) may accommodate schools under the free school programme. This will need to be kept under review as opportunities to attract quality providers arise and as government policy develop. Quality will be the council's prime consideration. The delivery route will clearly affect the cost of the overall programme as free schools are currently capital funded directly by the Education Funding Agency.

If all the projects listed above were to be delivered, the relationship between capacity and demand would be as set out in Graph 2. At the zenith of demand, currently predicted to be 2018, there is 'overcapacity' of 150 reception places, five forms of entry across the borough. At this point, this seems to be a rational programme which can be kept under review, as in the light of development plans in London, the projections are likely to rise rather than reduce.

Graph 2. Total primary demand and capacity including all permanent place projects



In Appendix 1A there is a list of 'expandable' primary schools which are 'good' or 'outstanding'. These schools are not currently in the programme for expansion and in many cases, the appropriateness of expansion in terms of site and other issues is far from clear cut. It is important to highlight this list in order to revisit as projections are reviewed, the programme develops (particularly if existing key schemes do not come to fruition) and as schools' circumstances change.

Appendix 7 sets out how primary demand is spread across planning areas. This indicates that the current list of schemes will address the shortfall in all areas apart from the Fryent/Queensbury area. Pressure is clearly greatest in the north of the borough.

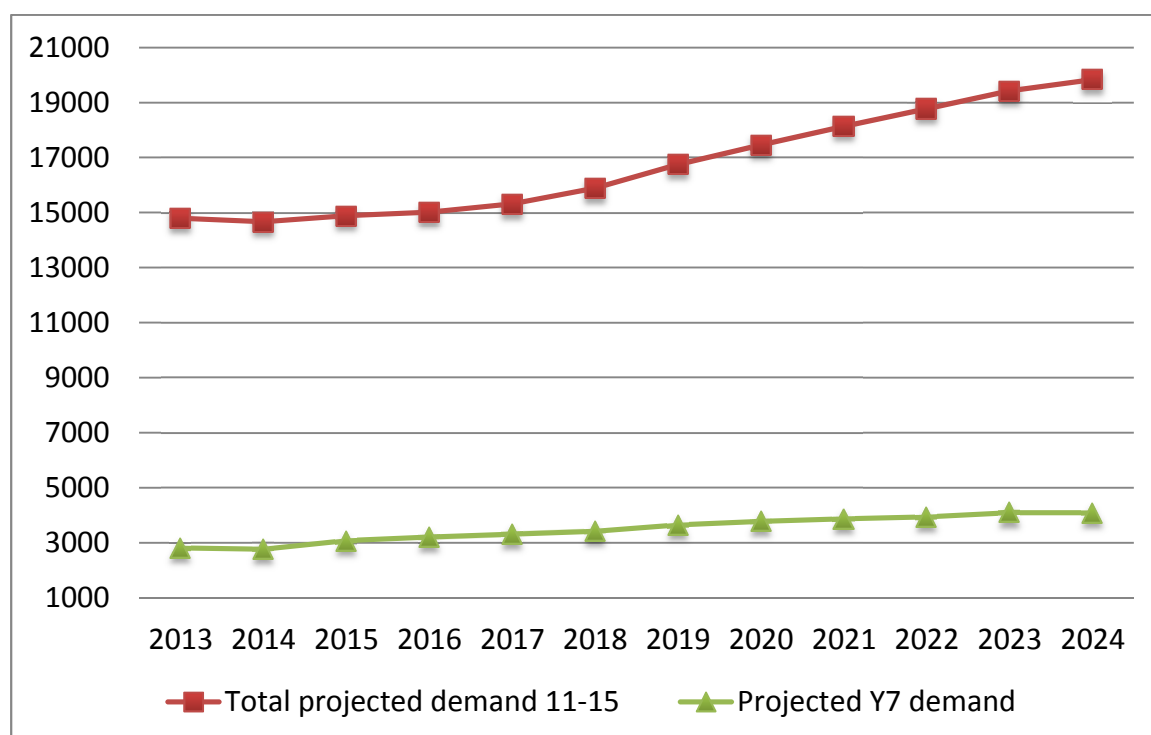
6.2 Secondary projections of need

The most recent large scale increase in provision in Brent was the opening of ARK Wembley in 2010. In addition, in September 2014, the Crest Academy (formerly Crest Boys and Crest Girls) expanded by 1FE with the opening of their new building. September 2014 has also seen the opening of Michaela Community School, a free school, in Wembley Park.

The current projections show that the increase runs behind the primary increase, not surprisingly, as the numbers feed through.

The need for secondary places is projected to increase as follows:

Graph 3. Growth in demand for secondary places 11-15 and Year 7



Demand for secondary school places 11-16 is projected to increase from 14,794 in 2013 to 19,835 in 2024, an increase of 34 per cent, as pupils transfer from the primary phase in greater numbers. In Year 7 the growth will be from 2,812 to a peak of 4,092 in 2023, an increase of 45.5 per cent.

We have the following additional permanent provision confirmed to come on stream as follows:

School	Expansion by	From
Alperton	1 FE	Sept 16
Copland	1 FE	Sept 16
Total	4 FE	

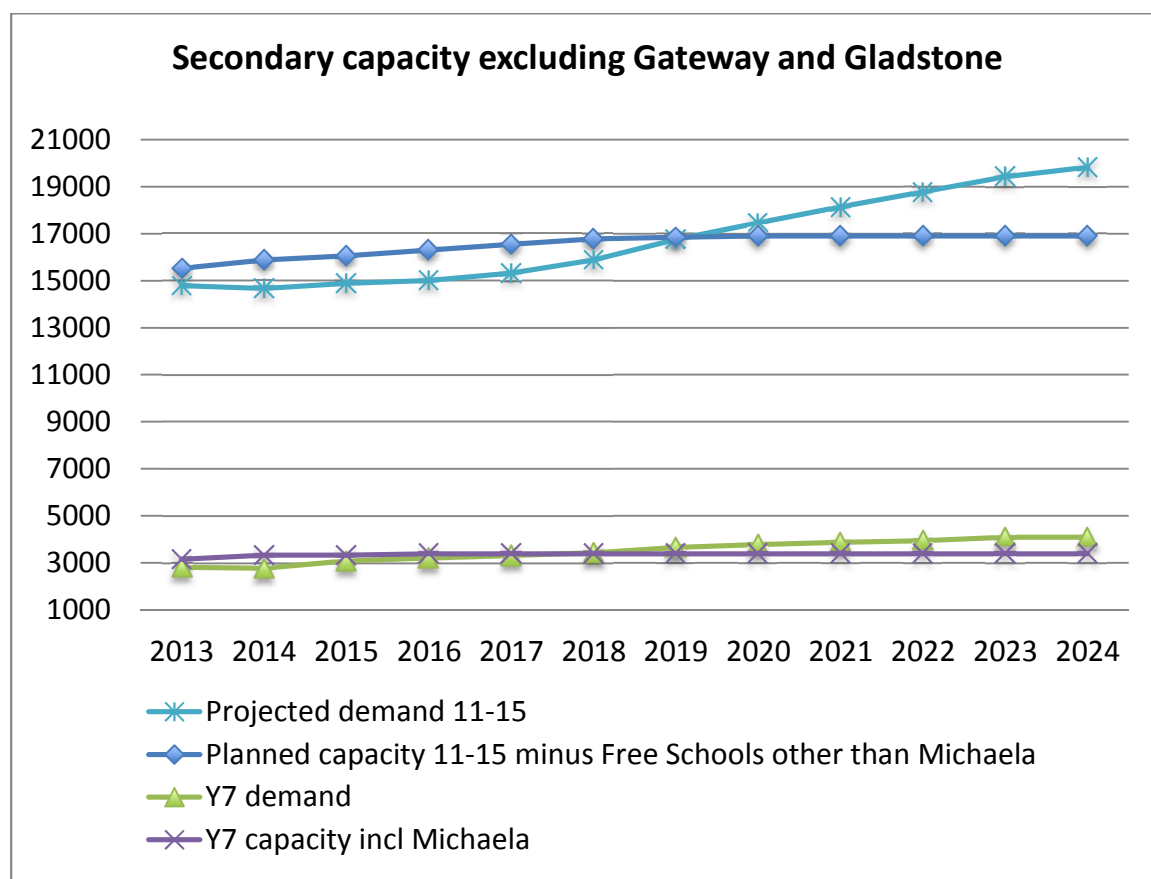
In addition we have two further free schools proposed for the borough and agreed by the DfE to proceed:

School	Size	From
Gateway Free School	3.3 FE	Sept 15
Gladstone Free School	4 FE	Sept 15
Total	7.3 FE	

If neither of these free schools proceeds, Year 7 demand will outstrip capacity by 2017 as shown in Graph 6 below.

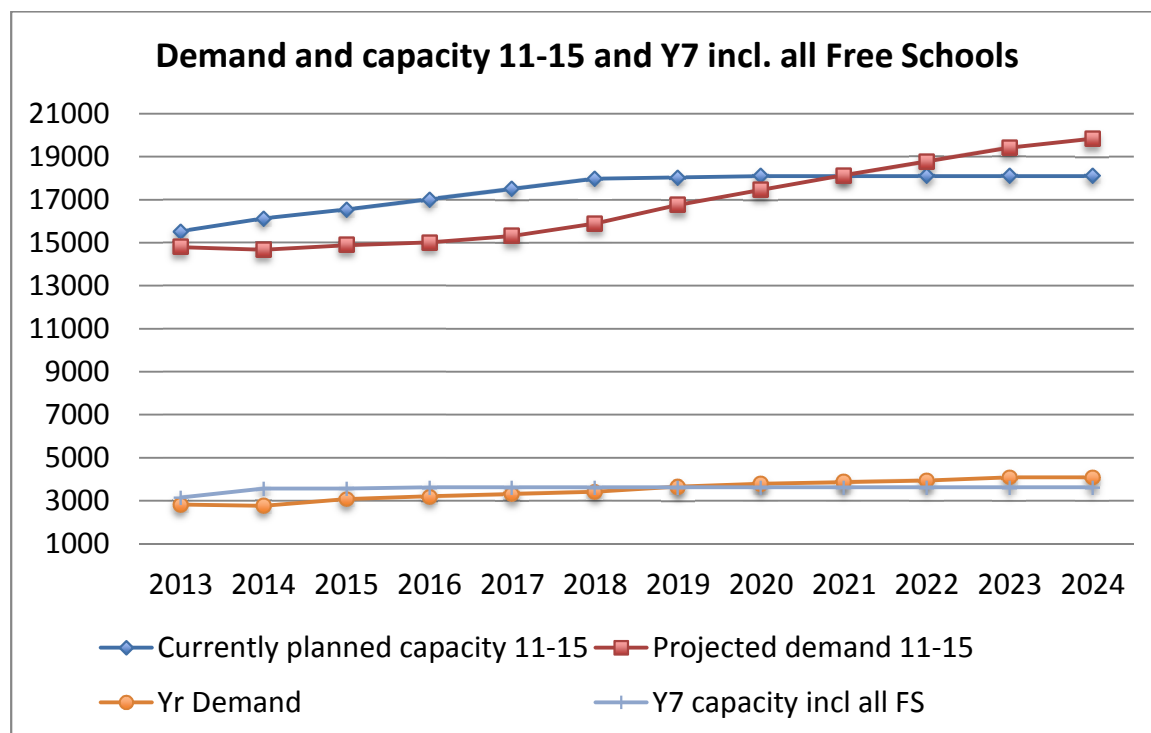
Michaela is the only free school where the DfE has signed a funding agreement. If only this proceeds, a shortfall appears in 2020, in terms of overall provision, growing to 20 FE by 2024, and in 2018 in terms of Yr7 capacity, where the shortfall will be just over 1 FE, growing to 9 FE by 2019 and 24 FE by 2024.

Graph 6. Demand and planned capacity 11-15 incl. Michaela FS only



If all of the free schools proceed, in Year 7, the shortfall arises from 2019 equivalent to 1 FE in that year, rising to a 16 FE shortfall by the peak year of 2023 as set out in Graph 7 below.

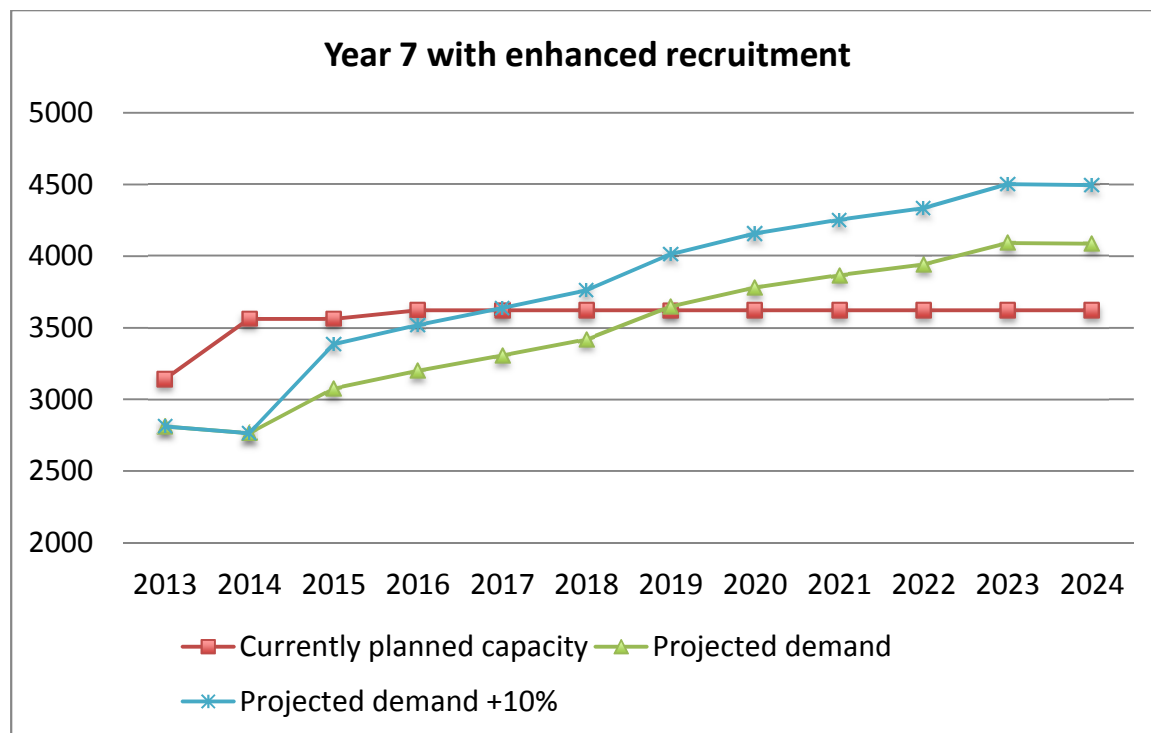
Graph 7. Demand and capacity 11-15 incl. all Free Schools



The projections assume a similar level of imports and exports as the previous trends. If the performance of the least popular schools were to be turned around, this would potentially have the effect of increasing the total level of demand for secondary places above the current projections by, say 10 per cent (representing the net difference in the 2013 admissions round between transfers into and out of the borough).

The result of this enhanced recruitment is modelled in Graph 8.

Graph 8. Secondary demand assuming balanced transfers in and out-borough (i.e. enhanced recruitment to Brent Secondary Schools).



In conclusion, whilst in the medium to longer term further expansion may be required over the existing planned capacity, in the short term our focus needs to be on getting the existing schools to be more attractive to local parents and influencing the incoming free schools to be both high quality and to complement the other schools. The other strand of work is to explore the incorporation of a new secondary school in large scale redevelopment such as Old Oak Common.

7. Finance: Capital and revenue

Since 2011 the council has received £135.98m Basic Need Capital Grant funding from central government to provide school places. A further £11.11m has been secured through S106, school and diocesan board contributions and the council's own capital programme.

A total of £19.23m has been spent on both temporary and permanent school places to the end of the 2013/14 financial year from these funding sources. A further £87.16m has been committed to the delivery of schemes adopted as part of the School Expansion Programme agreed in May 2012.

Predicting the future costs of providing school places remains inherently difficult to forecast, particularly as currently construction costs are rising at a rate significantly in

excess of inflation. The council's ability to fund further schemes beyond those proposed for adoption will be dependant upon the remaining levels of secured funding and future allocations of Basic Need Grant funding. Work is ongoing to identify and secure additional funding sources for the future requirements of the programme.

More school places could be provided from the same amount of money by reducing the total cost of providing each school place. This could be achieved by tighter restrictions on the scope of projects and by more strategic procurement. More school places could also be provided if there were no cost of construction to the council i.e. through new free schools.

There is risk to the council in making assumptions on the delivery of school places through proposed free school developments. If these proposals are not delivered or there are delays in provision the council will have a statutory duty to provide and fund the required school places.

The revenue funding for schools is based on an annual census of pupil numbers, in line with the National Funding Formula. If, at the request of the Local Authority, a school takes on additional pupils, bulge classes, expansions and new provision in satellites after the census has been taken, the school will receive funding from the council's Dedicated Schools Grant (DSG). This funding is for a full class for the remainder of the financial year and the following financial year and has been put in place to ensure that schools are not adversely affected by agreeing to expand. The funding has been set at differing rates dependent on the nature of the expansion, where schools will receive £3,300 per pupil or £3,600 per pupil if they are placed in an annexe or off site building to the school.

The funding model and budget for revenue funding of expansions is agreed by the Brent Schools Forum on an annual basis and has been accounted for within the DSG deficit recovery plan, which is due to breakeven in 2014/15.

8 List of Appendices

Appendix 0: Action plan

Appendix 1: Relevant objectives in existing strategic plans

Appendix 2: Map of Planning areas.

Appendix 3: School preferences

Appendix 4: Partnership commitment for academies etc.

Appendix 5: List of schemes already delivered

Appendix 6: Projected demand for school places in Brent

Appendix 7: Primary Projections by Planning Area

List of actions from School Place Planning Strategy 2014-18

APPENDIX 0

Objective	Activity	Lead officer	Milestones
To pursue feasible expansions of good and outstanding primary schools to meet need	Add proposed expansions at Byron Court, Oakington Manor and Leopold to the expansion programme Develop project plans for each scheme and take forward	Operational Director, Early Help and Education Operational Director, Property and Projects	In principle decision at Cabinet October 2014 Set out in detailed project plans.
To ensure that major regeneration projects incorporate good quality school places	Incorporate school expansions as planned in the following regeneration schemes: • South Kilburn • Stonebridge • Oriental City • Wembley Park Pursue availability of the site for a 3FE primary school on the Alperton Stanley Avenue site	Strategic Director, Regeneration and Growth	Plans in place for all school developments by [date]
To work towards amalgamation of separate infants and junior schools	Pursue formal amalgamation of Lyon Park Infants and Junior Schools Work towards the amalgamation of Carlton Vale Infants School and Kilburn Park Junior School as part of expansion and rebuild in the South Kilburn Regeneration Programme	Operational Director, Early Help and Education	Report to Cabinet February 2015 Report to Cabinet April 2015

Objective	Activity	Lead officer	Milestones
	Work towards the amalgamation of Malorees Infants and Juniors as part of an expansion scheme Discuss amalgamation with headteachers and governing bodies of separate infants and junior schools and consider when key opportunities (such as HT vacancy) arise		Report to Cabinet April 2015 Ongoing
To establish a joint meeting with schools which oversees school place planning	Obtain nominations and establish full membership, terms of reference and meetings timetable	Operational Director, Early Help and Education	First meeting October 2014
To ensure that the housing data fed into the pupil roll projections is based on up to date child yield forecasts	Carry out an intensive review of actual child yield from completed developments Use the review to re-work overall child yield forecasts GLA annual projection exercise	Head of Pupil and Parent Services	September 2014 By November 2014 (GLA timetable)
To ensure that planned primary provision is sufficient to meet need given uncertainty around in migration and housing build-out	Develop contingency plan to allow for schemes which are delayed or cancelled Continue temporary places programme to meet urgent need where necessary	Operational Director, Property and Projects	Report to Cabinet December 2015
To ensure a sustainable procurement solution for school building schemes which delivers value for money	Obtain approval to a strategy for Phase 3 expansion schemes Obtain approval to a longer term procurement strategy	Operational Director, Property & Assets Operational Director, Property & Assets	Report to Cabinet September 2014 Report to Cabinet January 2015

Objective	Activity	Lead officer	Milestones
To keep the school places programme under constant review	Weekly monitoring of children awaiting school places	Head of Pupil and Parent Services	Weekly
	Monthly monitoring of programme delivery and capacity numbers	Capital Programme Manager	Monthly
	Termly reviews of projection accuracy and validity of planning assumptions	Operational Director, Early Help and Education	October, February, June
	Review of reception demand both on-time and late	Head of Pupil and Parent Services	Monthly from March to June, weekly from June to September
	Review of secondary transfer data and secondary projections	Head of Pupil and Parent Services	April

APPENDIX 1: RELEVANT OBJECTIVES IN EXISTING STRATEGIC PLANS

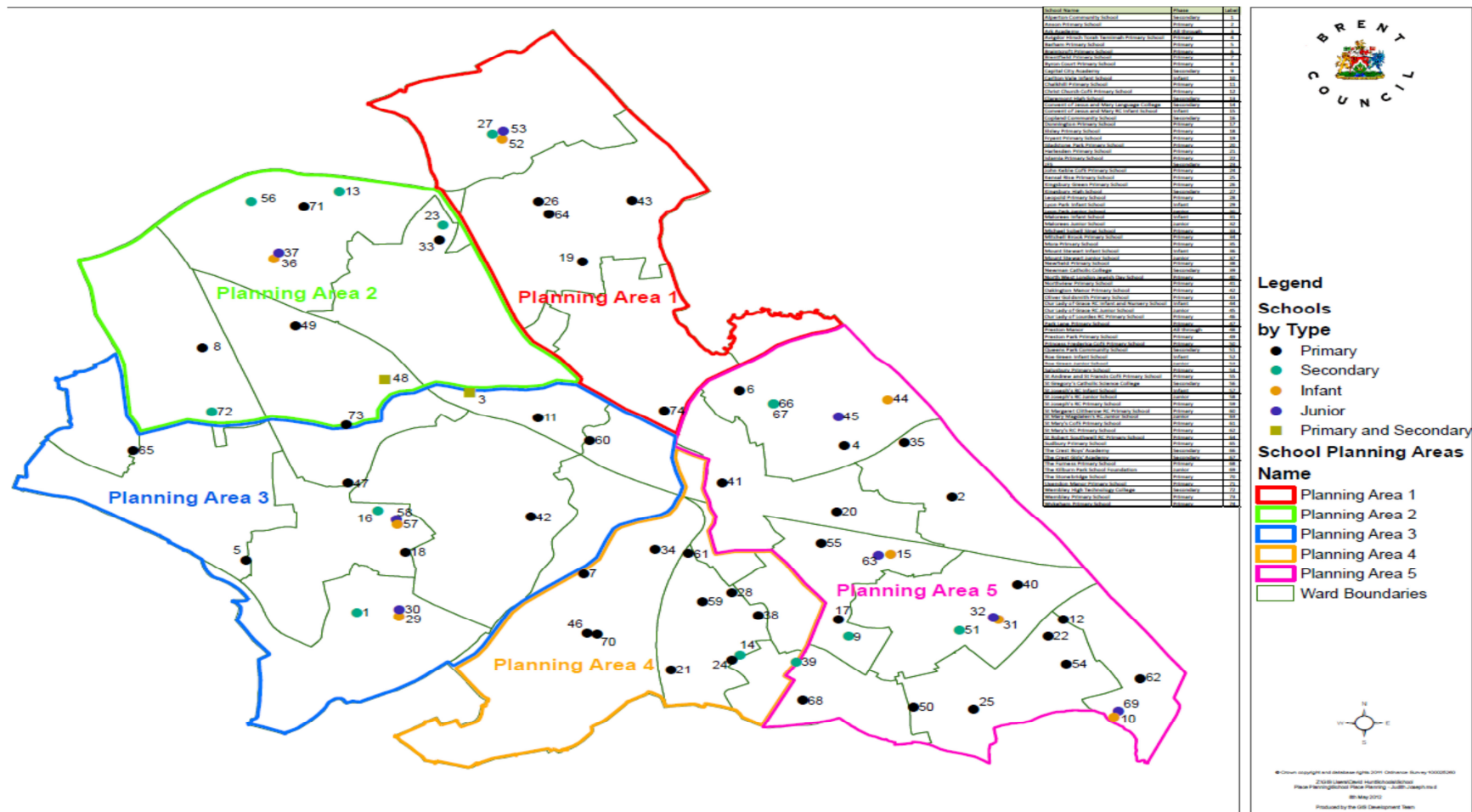
Brent Borough Plan 2013	A Plan for Children and Families in Brent 2012-2015	Brent Strategy for SEND 2013-2016	Early Years and Childcare Strategy 2013-2016	Brent 14-19 Partnership Statement of priorities 2014
Better lives for children and families: - Places in Brent schools for all who need them - All Brent schools are good quality - Children and young people achieve well - Families needing support get it when they need it most and become more independent - Vulnerable children and young people have high quality support when they need it and become more resilient	The vision is to make Brent the best place in London to live, work and learn by: - Putting children and young people first each time - Having the highest ambition for children and young people - Making a positive difference to the lives of children and young people. We will focus on closing the gap between those who do well and those who may need extra support to thrive, to enable successful progression into adult life and employability.	The strategy has three overarching principles: - Involve children and young people and their parents and carers in all decisions about them, promoting independence and autonomy through to adulthood. - Ensure inclusion and participation in all aspects of family, school and community life in a local and inclusive setting, making the best possible use of available resources. - Secure the right support at the right time for families by working in partnership with schools, health,	The Early Years and Childcare Strategy promotes high quality early years provision which is: - Tailored to meet the needs of individual children and their families, including supporting parents to access work or study - Accessible, affordable and increasingly flexible - Family focused and with a strong outcomes orientation - Where children are able to achieve their full potential, with a particular focus on encouraging resilience, independence and	The Partnership will take collective responsibility to provide exceptional opportunities for all young people to follow academic, vocational and work-based routes that ensure: - Participation of all 14-18 year olds in education and training - Improved attainment, including high value-added and retention - Breadth of choice at each transition stage - Clear progression pathways and increased participation at level 4 - Impartial information, advice and guidance for young people and their parents

Brent Borough Plan 2013	A Plan for Children and Families in Brent 2012-2015	Brent Strategy for SEND 2013-2016	Early Years and Childcare Strategy 2013-2016	Brent 14-19 Partnership Statement of priorities 2014
		social care and other key partners.	achievement for more disadvantaged and vulnerable families and children.	• Targeted support to raise the achievement of underperforming groups • Enhanced support for young people with SEND • Early identification and intervention for young people at risk before and during the 14-19 phase • The needs of local communities and the local economy are met

List of Good and Outstanding Brent Primary Schools that have potential for expansion and are not included with the current Permanent Primary School Expansion Programme				
Primary School Name	School Status	Expansion History	Current FE	Latest Ofsted grading
PLANNING AREA 1				
Kingsbury Green Primary School	Community		3	Good
Oliver Goldsmith Primary School	Community		2	Good
Roe Green Infants School	Community	Managing satellite temporary provision at Strathcona (see below)	4	Outstanding
Roe Green Junior School	Community		4	Good
Wykeham Primary School	Community	1no. Reception bulge class in 2010, 2011 and 2014	2	Good
PLANNING AREA 2				
Mount Stewart Infant School	Community	1no. Reception bulge class in September 2012	3	Good
Mount Stewart Junior School	Community	1no. Year 3 bulge class in September 2015	3	Outstanding
Wembley Primary School	Community		4	Good
PLANNING AREA 3				
Chalkhill Primary School	Community	1no. Reception bulge class in both 2011 & 2012	2	Good
Lyon Park Junior School	Community		4	Good
St. Joseph's RC Infant School	VA		2.3	Outstanding
St. Joseph's RC Junior School	VA		2.3	Outstanding
St. Margaret Clitherow RC Primary School	VA		1	Good
PLANNING AREA 4				
Convent of Jesus & Mary Infant School	VA		3	Outstanding

John Keble CE Primary School	VA		2	Good
St. Mary's CE Primary School	VA		1.5	Good
PLANNING AREA 5				Good
Anson Primary School	Community		1.7	Good
Braintcroft Primary School	Community	1no. Reception bulge class in 10 + 1no. Yr 1 bulge class in April 11	3	Good
Donnington Primary School	Community		1	Good
Northview Primary School	Community		1	Good
Our Lady of Grace RC Infant School	VA		2	Outstanding
Our Lady of Grace RC Junior School	VA		2	Outstanding
Princess Frederica CE Primary School	VA		3	Good

APPENDIX 2: MAP OF PRIMARY PLANNING AREAS



APPENDIX 3: TABLES SHOWING SCHOOL PREFERENCES

Reception Co-ordination Figures

Brent Number of on time applications received for 2014 - 3935 (143 more applications than 2013). We received 3723 online applications (94.6 per cent)

Brent Number of on time applications received for 2013 - 3792 (75 more applications than 2012). We received 3222 online applications (85 per cent)

Brent Number of on time applications received for 2012 - 3717 (100 more applications than 2011). We received 1901 online applications (51.1 per cent)

Brent Number of on time applications received for 2011 - 3617 (34 more applications than 2010). We received 1735 online applications (48 per cent)

	2014	%	2013	%	2012	%	2011	%
Number of pupils offered 1 st preference	3163	80.3	2946	78	2879	77	2844	79
Number of pupils offered 2 nd preference	364	9.3	364	9.5	331	9	304	8
Number of pupils offered 3rd preference	132	3.4	122	3	147	4	136	4
Number of pupils offered 4th preference	53	1.3	64	2	77	2	67	2
Number of pupils offered 5th preference	24	0.6	34	1	27	1	28	0.7
Number of pupils offered 6th preference	14	0.4	17	0.5	13	0.3	19	0.5
Number of pupils offered Nearest school with vacancies - No preference offer	185	4.7	245	6	243	7	190	5
Unplaced pupils	0	0	0	0	0	0	29	0.8
Total	3935	100	3792	100	3717	100	3617	100

Number of pupils offered a place in other boroughs

2014 - 397 pupils were offered an out of borough school (10 per cent)

236 out borough pupils have been offered a place in a Brent school.

2013 - 425 pupils were offered an out of borough school (11 per cent)

209 out borough pupils have been offered a place in a Brent school.

2012 - 330 pupils were offered an out of borough school (8 per cent)

267 out borough pupils have been offered a place in a Brent school.

2011 - 311 pupils were offered an out of borough school (8.6 per cent)

238 out borough pupils have been offered a place in a Brent school.

Secondary Co-ordination Figures

Brent Number of on time applications received for 2014 - 3192 (196 more applications than 2013). We received 2998 online applications (94 per cent)

Brent Number of on time applications received for 2013 - 2996 (66 more applications than 2012). We received 2813 online applications (94 per cent)

Brent Number of on time applications received for 2012 - 2930 (90 less applications than 2011). We received 1490 online applications (51 per cent)

Brent Number of on time applications received for 2011 - 3020 (134 more applications than 2010). We received 1985 online applications (66 per cent)

	2014	%	2013	%	2012	%	2011	%
Number of pupils offered first preference	2071	65	2015	67	1913	65	1949	65
Number of pupils offered second preference	472	14.7	426	14	405	14	406	13
Number of pupils offered third preference	240	7.5	179	6	236	8	201	7
Number of pupils offered fourth preference	113	3.5	93	3	91	3	135	5
Number of pupils offered fifth preference	40	1.2	54	2	56	2	72	2
Number of pupils offered sixth preference	24	0.8	33	1	36	1	33	1
Number of pupils offered Nearest school with vacancies - No preference offer	232	7.3	196	7	193	7	224	7
Unplaced pupils	0	0	0	0	0	0	0	0
Total	3,192	100	2,996	100	2,930	100	3,020	100

Number of pupils offered a place in other boroughs

2014 - 848 pupils were offered an out of borough school (26.6 per cent)

540 out of borough pupils were offered a place in a Brent school, a difference of 308.

2013 - 765 pupils were offered an out of borough school (26 per cent)

503 out of borough pupils were offered a place in a Brent school, a difference of 262.

2012 - 690 pupils were offered an out borough school (24 per cent)

524 out borough pupils were offered a place in a Brent school, a difference of 166.

2011 - 687 have were offered an out of borough school (23 per cent)

530 out of borough pupils were offered a place in a Brent school, a difference of 157.

APPENDIX 4: PARTNERSHIP COMMITMENT FOR ACADEMIES.

Partnership commitment for academies and free school providers working in collaboration with the council

Academies and free school providers working with the council will be expected to demonstrate:

1. An absolute commitment to the ethos and values of inclusive education for all Brent's children and recognition of the positive role schools should play in the wider community
2. A commitment to a close working relationship with the local authority in order to maintain an appropriate focus on borough-wide priorities, including local authority nomination of a member of the governing body and a commitment to sharing performance information
3. The ability to deliver school improvement in an urban context
4. That the establishment of the proposed education provision would be supported by demonstrable parental demand and with a genuine commitment to providing school places for local children
5. Appropriate staffing arrangements to ensure high quality teaching and learning from qualified staff and good employment practices, including in relation to support and contracted staff
6. A commitment to meeting the needs of Brent's diverse community
7. A commitment to ensuring the future employability of young people (in particular in secondary and 16 to 19) through links with business, industry and higher education
8. A commitment to community access and use of facilities through agreed extended opening and lettings policy
9. A commitment to high standards of health and safety for both pupils and staff
10. A commitment to good pupil nutrition and healthy eating
11. A commitment to inclusive practice and fair access to the school for all pupils as governed by the Admission Code of Practice and the Authority's Fair Access Protocols

APPENDIX 5: LIST OF SCHEMES ALREADY DELIVERED

Permanent School Places created between 2006/07 and 2014/15

Academic year in which places created	School	No. of places created	Places shown in FE
2007/08	Salisbury	14	0.1
2008/09	Wembley Primary	210	1.0
2009/10	Anson	49	0.2
2010/11	St Marys CE	-105	-0.5
2010/11	Park Lane Primary	210	1.0
2010/11	Sudbury Primary	210	1.0
2010/11	Ark Academy (Primary only)	420	2.0
2011/12	Byron Court	70	0.3
2011/12	Brentfield Primary	210	1
2011/12	Newfield Primary	210	1
2011/12	Preston Manor Lower	420	2
2012/13	Barham Primary	210	1
2012/13	Fryent Primary	420	2
2012/13	Mitchell Brook Primary	210	1
2013/14	St Robert Southwell RC Primary	105	0.5
2014/15	Preston Park	210	1
2014/15	Harlesden	420	2
2014/15	St Joseph's RC Primary	210	1
2014/15	Vicar's Green	105	0.5
	Total	3,808	18.1

Temporary School Places created between 2006/07 and 2014/15

Academic year in which places created	School	No. of places created	Places which became permanent
2007/08	Park Lane	30	30
2007/08	Preston Park	30	
2007/08	Stonebridge	30	
2007/08	Sudbury Primary	30	
2008/09	Preston Park	30	
2008/09	Ark Academy	60	60
2009/10	Newfield	30	60
2010/11	Braintcroft Primary	60	
2010/11	Brentfield Primary	30	30
2010/11	Newfield Primary	30	
2010/11	Islamia Primary	30	
2010/11	Preston Manor Lower	60	60

2010/11	Preston Park Primary	20	
2010/11	St Robert Southwell RC Primary	15	15
2010/11	Wykeham Primary	30	
2010/11	Curzon Crescent Nursery	30	
2010/11	College Green Nursery	12	
2010/11	Granville Nursery	8	
2011/12	College Green Nursery	12	
2011/12	St Joseph's RC Primary	20	
2011/12	Chalkhill Primary	30	
2011/12	Furness Primary	60	
2011/12	Mitchell Brook Primary	30	30
2011/12	North West London Jewish School	20	
2011/12	Preston Park Primary	10	
2011/12	Wykeham Primary	30	
2011/12	Granville Nursery	8	
2012/13	St Robert Southwell RC Primary	15	15
2012/13	Chalkhill Primary	30	
2012/13	Mount Stewart Infants	30	
2012/13	Wembley High Technology College	60	
2012/13	Vicars Green Primary	15	
2012/13	Preston Park Primary	60	
2012/13	Stonebridge Primary	180	
2012/13	Curzon Crescent Nursery	30	
2012/13	College Green Nursery	25	
2013/14	Gwenneth Rickus	450	
2013/14	Strathcona	210	
2013/14	Anansi	90	
2013/14	Douglas Avenue	90	
2013/14	Ashley Gardens	60	
2014/15	Church Lane	90	
2014/15	Furness Primary	30	
2014/15	Wykeham Primary	30	
2014/15	Byron Court Primary	30	
2014/15	Uxendon Manor Primary	30	
	Totals	2,130	300

APPENDIX 6: PROJECTED DEMAND FOR SCHOOL PLACES IN BRENT

GLA Projections

- The council receives its projections for the future number of pupil places required from the Greater London Authority (GLA). Table 1 below shows the GLA projections of the number of primary aged children for future academic years by year group across the whole borough.

GLA projections for all primary planning areas by year and age									
		Year Group							Totals
PA	Year September	REC	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Reception to Year 6
All	2013	3,995	3,978	3,880	3,666	3,568	3,475	3,359	25,921
All	2014	4,146	4,124	4,067	3,954	3,727	3,624	3,524	27,166
All	2015	4,317	4,207	4,156	4,093	3,975	3,747	3,639	28,134
All	2016	4,320	4,381	4,242	4,184	4,117	3,999	3,763	29,006
All	2017	4,380	4,381	4,417	4,270	4,209	4,142	4,015	29,815
All	2018	4,400	4,443	4,418	4,448	4,296	4,234	4,160	30,399
All	2019	4,387	4,463	4,482	4,449	4,475	4,323	4,253	30,832
All	2020	4,366	4,451	4,505	4,516	4,478	4,504	4,344	31,165
All	2021	4,338	4,427	4,490	4,536	4,544	4,506	4,524	31,366
All	2022	4,306	4,379	4,447	4,505	4,548	4,557	4,514	31,256
All	2023	4,283	4,346	4,399	4,461	4,516	4,561	4,564	31,130
All	2024	4,268	4,322	4,365	4,412	4,471	4,528	4,568	30,932

Table 1: GLA primary projections for all Brent by year group and academic year

2. Table 1 shows that the highest total number of places - 31,366 - will be required by September 2021, but the largest Reception cohort - 4400 – is forecast by September 2018: this is an increase of 405 from September 2013, and the equivalent of 14 additional Reception classes. Across all primary year groups the demand will increase by 5445 between September 2013 (25,921) and September 2021 (31,366), an increase of 21 per cent, before beginning a gradual decline.
3. Table 2 shows the equivalent data for the secondary phase.

Table 2: GLA secondary projections for all Brent by year group and academic year

GLA secondary projections by year and age										
		Year Group								Totals
PA	Year	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Age 18	11 to 15
All	2011	2,912	2,912	2,938	3,007	2,942	2,277	1,445	25	14,711
All	2012	3,033	3,011	3,006	3,098	3,060	2,212	1,379	29	15,208
All	2013	2,812	2,988	2,998	3,004	2,992	2,123	1,372	0	14,794
All	2014	2,765	2,843	3,000	3,079	2,979	2,046	1,363	16	14,666
All	2015	3,077	2,797	2,873	3,030	3,108	2,077	1,307	8	14,885
All	2016	3,200	3,088	2,805	2,881	3,037	2,152	1,318	8	15,011
All	2017	3,306	3,212	3,098	2,813	2,888	2,101	1,366	8	15,317
All	2018	3,419	3,319	3,222	3,107	2,821	1,999	1,338	8	15,887
All	2019	3,648	3,432	3,329	3,231	3,115	1,952	1,271	8	16,755
All	2020	3,780	3,662	3,442	3,339	3,240	2,156	1,239	8	17,463
All	2021	3,867	3,795	3,675	3,453	3,348	2,243	1,368	7	18,138
All	2022	3,941	3,882	3,806	3,685	3,462	2,318	1,423	8	18,776
All	2023	4,092	3,947	3,886	3,810	3,688	2,391	1,464	8	19,423
All	2024	4,086	4,098	3,950	3,889	3,812	2,548	1,516	9	19,835

4. Table 2 shows that the highest total number of places – 19,835, and the largest Year 7 cohort – 4086 – is forecast by September 2024. This represents an

increase of 5,041 in the need for total places from September 2013, equivalent to 34 forms of entry. The Year 7 difference forecast for 2024 is equal to over 42 FE, an increase of 70 per cent over the 2013 recruitment level.

5. The projections for September 2013 will be checked against the January 2014 school census once returns from all schools have been received. This will confirm the actual number of children on roll and validate the accuracy of the projections.

GLA Methodology and Accuracy

6. Brent and 25 other London boroughs commission the Greater London Authority (GLA) for school place projections. The GLA (and its predecessors) have provided such projections for over 30 years and, overall, they have been generally reliable within certain margins. However, they have always come with “health warnings” since the science of predicting school populations is not exact and has to deal with a large number of variables that cannot be predicted with precision.
7. Since they rely to some extent on projecting forward trends in actual school admissions the projections have struggled during the last decade to reflect the scale of migration patterns affecting many London authorities. They have sometimes over-estimated demand arising from new housing where the pace of development was slowed due to economic factors and conversely under-estimated demand where patterns of tenure such as “buy to let” were prevalent.
8. The projections tend to be most accurate at the overall, borough, level. Since they rely to a significant degree on actual recent trends, they are also more reliable over the short term. At more local levels, factors such as the location (and relative popularity) of individual schools in relation to borough boundaries can distort the picture. In all cases, therefore, it is necessary for local knowledge to be factored into the judgement made about the scale of change needed to school capacities.
9. The GLA uses birth and fertility rates (obtained from health records), population data (obtained from national census data), school census data, numbers and ages of children without a school place, details of expanding schools, migration data and future housing development data to project school place demand. The housing development and school data is obtained from councils.
10. For planning purposes for primary schools the council and the GLA split the borough into planning areas. Planning areas (PA) are divisions of the borough based on natural boundaries such as major roads and are used as a method to project demand. They come with the ‘health warning’ that children frequently travel to school across planning area boundaries, particularly to attend faith schools.

11. Primary school roll projections are prepared for the council by the GLA on a planning area basis and aggregated to a borough wide figure. Prior to 2012 the standard projection methodology made use of a combination of catchment and replacement ratios. The catchment ratio is the ratio of school age groups to equivalent age groups in the local population – this is useful where the school roll reflects the local resident population and where longer range forecasts are required. The replacement ratio takes historical survival rates from one year group to the next and projects them forward. This method picks up the impact of cross border flows and is particularly useful where the number on roll does not reflect changes in the local population. The two ratios are combined in varying proportions over the ten years of projections with a greater emphasis placed on replacement ratios in the immediate years ahead and subsequently more emphasis is placed on catchment ratios.
12. In view of the recent large shifts in London's school rolls the GLA has devised an updated methodology, in use since 2012, to allow for this. The new approach includes analysis of 'survival ratios'; the percentage of children who move into the following academic year in an area and do not move out of borough for example. Up to six years of historic data are used to calculate survival ratios. Early testing since 2012 suggests that this new methodology performs better than the other standard methods available. It has now become the GLA service's primary method of roll projection.
13. This change in methodology indicates that the GLA projections used in this report and for a future revised strategy are more likely to be accurate than the data used for the previously approved strategy in August 2012.
14. Alongside the methodology used, the quality of data going into the projections is also crucial to the accuracy of the GLA projections. Prior to the 2011 Census, it was believed that the accuracy of the GLA projections was questionable as projections showed an under estimation of numbers. To rectify the situation the council would add between five and ten per cent to the projections so that they reflected more accurately what was happening in reality. At the time of the August 2012 report approving the current strategy for primary school expansion the GLA projections being used did not include data from the most recent 2011 national Census. Now that data from the 2011 Census has been made available and included along with changes to the GLA methodology described above, the projections are more likely to be accurate.
15. Another significant area of data forming the GLA projections is the local information provided by the council. In the past, the GLA has only used the number of children on school rolls to project forward; it now includes the number of children who at the time of data collection are not on a school roll as they are waiting for an offer.
16. In order to test the GLA projections for September 2014, officers have compared the GLA projections over the last three academic years to data from the school censuses taken three times each academic year. This shows that in fact, the GLA projections for the reception intake have actually over-estimated

the number of children there would be in Brent consistently over the last three years. For our decision-making, it is important to note however that the difference between projections and actuals is much less in the current year, indicating that the projections have become more likely to be accurate since the methodology changed.

17. For the purposes of February's report on temporary accommodation requirements, officers have tested the GLA projections for Reception aged pupils for the 2014-15 academic year against the number of applications received on the closing date of 15 January 2014. 3,926 on time applications were received for admission to Reception in September 2014. Last year 683 late applications were received after the closing date as at the beginning of September 2013. It is a reasonable assumption that a similar pattern may generate approximately 700 late applications for the 2014/15 academic year. This makes a potential total of 4,626 applications for the 2014/15 academic year. In the last two years an average of ten per cent of Brent resident applications secured places out of borough rather than take up places in Brent. Last year 425 Brent resident pupils were offered out borough schools and 209 out borough pupils were offered a place in a Brent school a net loss of 216 Brent residents. Using this 90 per cent conversion rate for applications to places; this equates to 4,163 Reception places being required in 2014-15. GLA projections set out a requirement for 4,146 places. No such test can be applied to the older year groups however the analysis above indicates that the GLA projections are more likely to be accurate than in previous years. This test against actual data and historical trends shows that it is reasonable to use the GLA projections for school place planning for Reception aged children as well as for children in all year groups for September 2014.

APPENDIX 7: PRIMARY PROJECTIONS BY PLANNING AREAS

The following charts indicate the shortfalls in capacity in each planning area, showing both overall total levels of demand/capacity and the profile for the reception year in each area. The charts show the effect on capacity of the school expansions already approved and being implemented, plus the further proposed schemes identified in the body of the strategy.

Chart 1 Planning Area 1 – Queensbury/Fryent

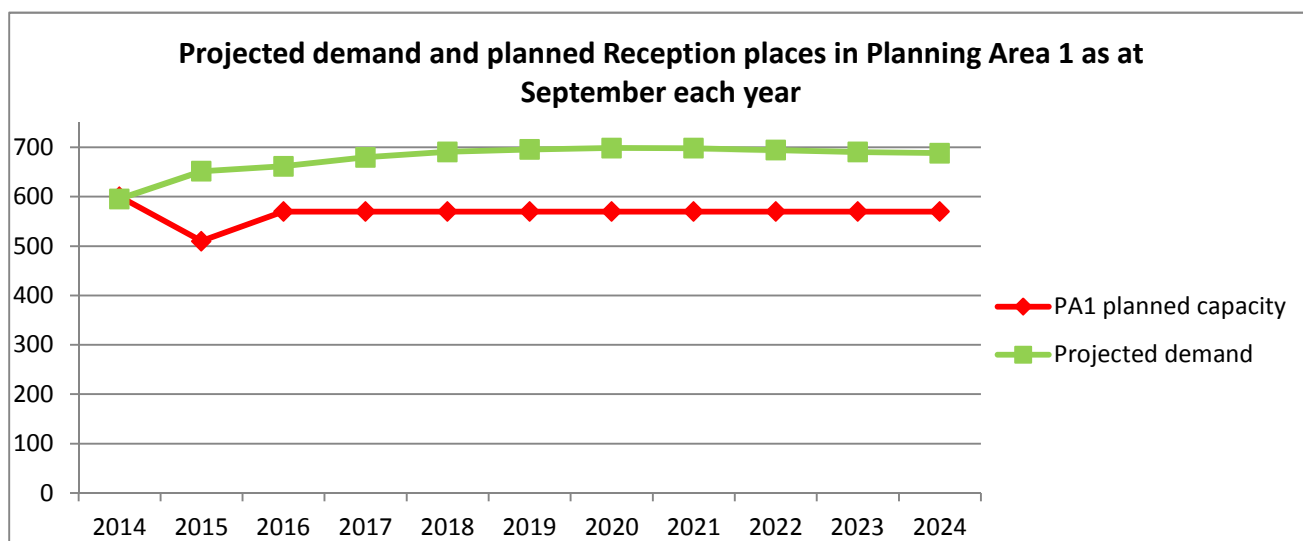


Chart 2 Planning Area 2 – Kingsbury/Kenton

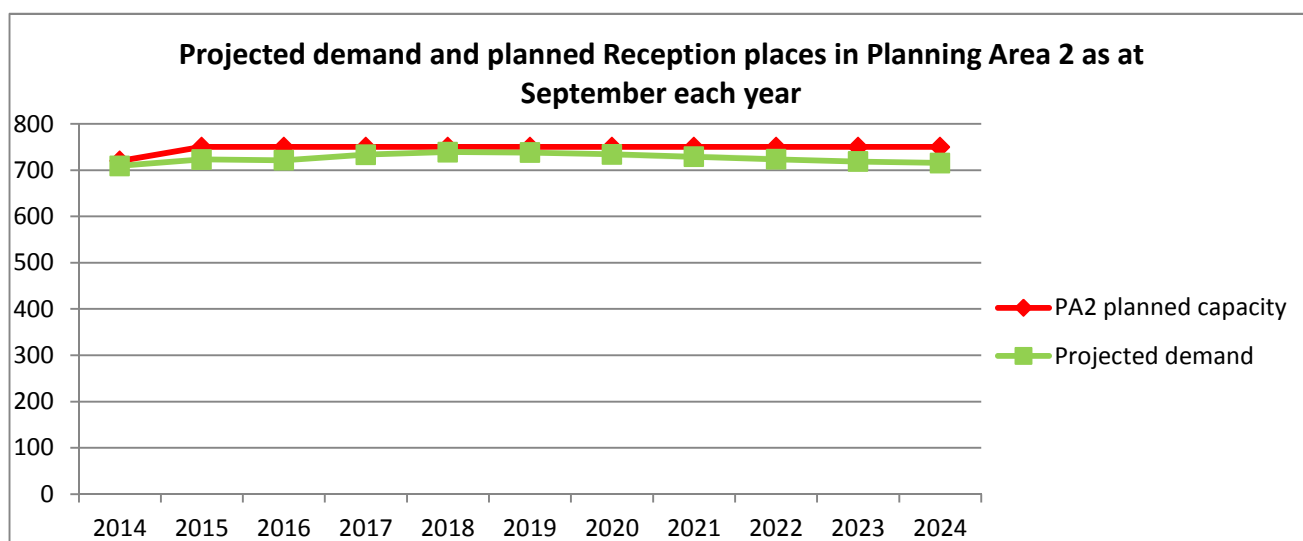


Chart 3 **Planning Area 3 – Wembley/Sudbury/Alperton**

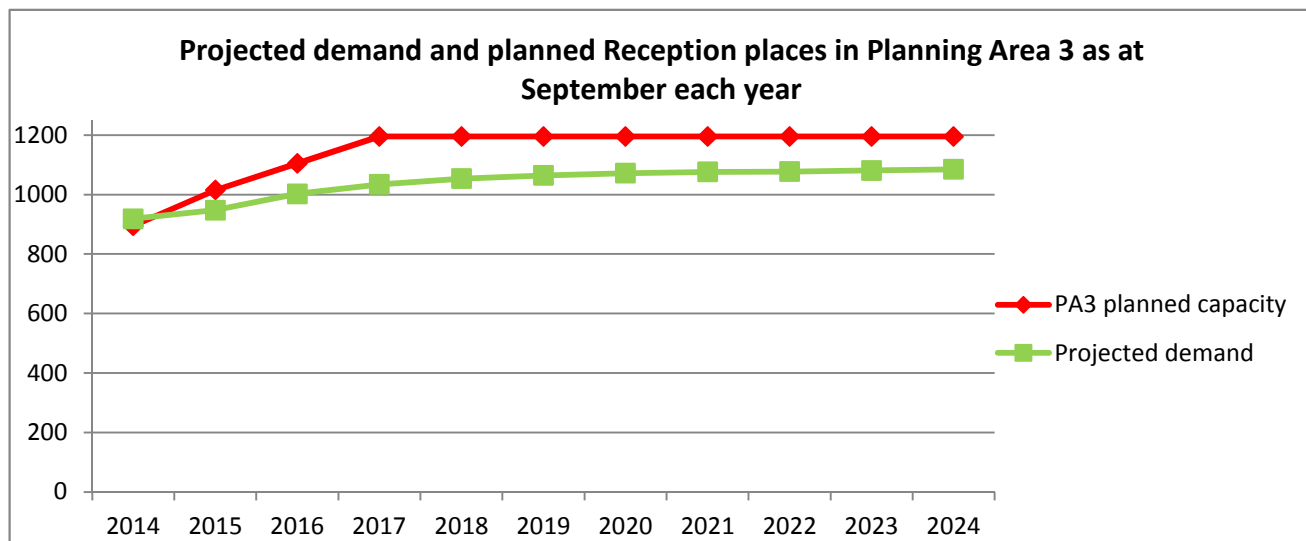


Chart 4 **Planning Area 4 – Stonebridge/Harlesden**

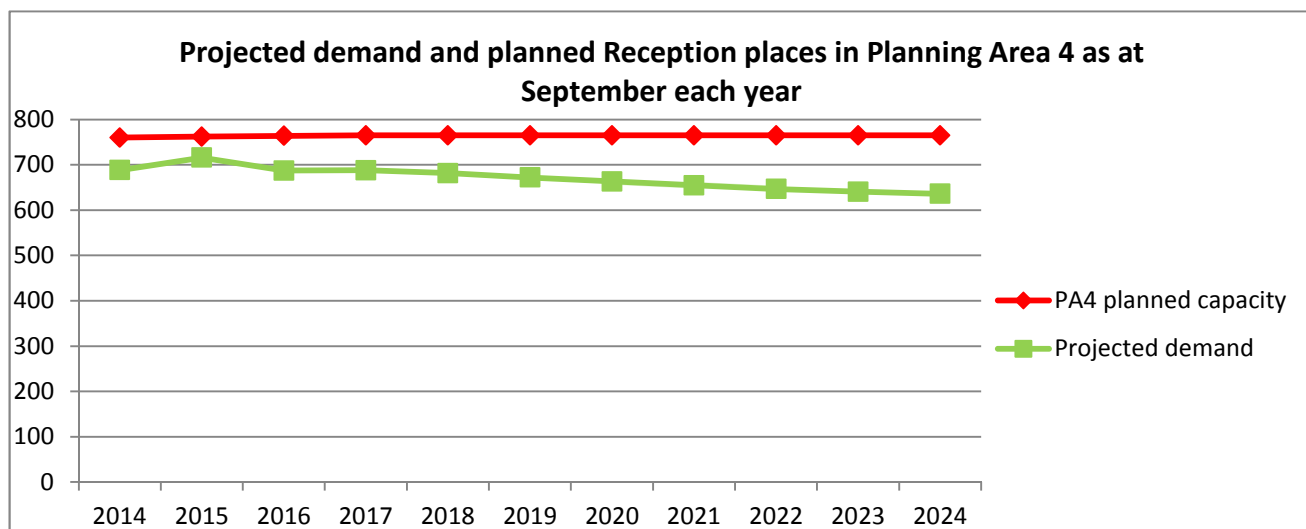
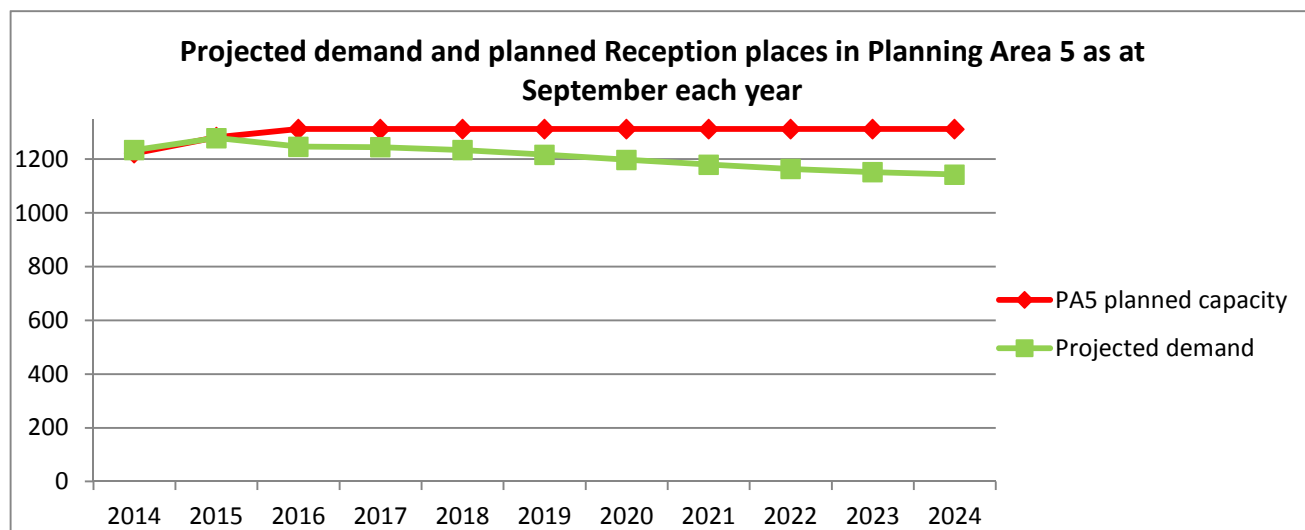


Chart 5 **Planning Area 5 – Dollis Hill/Kilburn**





Cabinet
13 October 2014

**Report from the
Director of Environment and Neighbourhood
Services**

Wards Affected:
ALL

**Event Day Parking and Vehicle Removals Pilot, and future
arrangements for remaining visitor scratch cards**

1.0 SUMMARY

- 1.1 In April 2014 the Council's Executive (Cabinet) decided to make some alterations to the Council's methods for removing illegally parked vehicles, and also relax Civil Enforcement Officer deployment on Wembley Stadium Event Days.
- 1.2 This report summarises the impact of the trial on the Council's Vehicle Removal operations, and consequently makes recommendations for future vehicle removal activity.
- 1.3 This report also provides an update on the validity of Visitor Parking Scratch Cards, which were scheduled to be removed from circulation on 31st August 2014.

2.0 RECOMMENDATIONS

- 2.1 That the Cabinet notes the findings of the Removal Pilot set out in paragraphs 3.5 to 3.11, the changes made between the start and end of the trial, and also the Financial Implications as set out in paragraphs 5.1 to 5.8.
- 2.2 That the Cabinet agrees to continue the use of the revised criteria for vehicle removal which have resulted from operating the trial, and also the implementation of proposed Customer Enhancements.
- 2.3 That the Cabinet delegates to the Operational Director, Environment & Protection authority to make minor amendments to the criteria and arrangements, on a continuing basis in consultation with the Lead Member for Environment. Any such change(s) would be subject to the agreement of the Chief Finance Officer.
- 2.4 That the Executive agrees to extend the validity of visitor parking scratch cards, already in circulation, indefinitely.

3.0 Vehicle Removal Pilot

Pre-Pilot

- 3.1 The intention of the vehicle removal pilot was to focus the Council's enforcement resource on those offences classified as more serious, and relax the enforcement of offences deemed to be less serious. Those offences considered to be more serious are those which may create traffic congestion, or affect road safety.
- 3.2 Officers also considered those offences where enforcement may be limited to the issue of Penalty Charge Notices. The goal of enforcement is to encourage compliance, and for resident / pay and display bay offences, it was thought that compliance could be achieved without impounding vehicles.
- 3.3 The pilot therefore proposed extensive alterations to the criteria for impounding vehicles. The pilot relaxed the criteria of 13 contravention types prior to the trial beginning.
- 3.4 The pilot commenced at the beginning of May 2014.

During Pilot

- 3.5 **May 2014.** The effects of the pilot were felt immediately, with 56% decrease in removal activity between the months of April and May. Most notably, activity fell from parking contraventions incurred in resident parking bays. From an operational perspective, the largest impact was for yellow line offences; concerns were raised that under the revised criteria some vehicles which were obstructive to the flow of traffic were not being effectively managed.

	Yellow Line Offences	Paid For Parking Bay Offences	Resident Bay Offences	Driveway/ Dropped Kerb Offences	Footway Parking Offences	Other Offences	Total
April-2014	81	8	79	35	14	15	232
May-2014	62	2	7	19	0	13	103
% Increase / Decrease	-23%	-75%	-91%	-46%	-100%	-13%	-56%

- 3.6 Following meetings with the Council's main Contractor, Serco to monitor the impact of the pilot, it became clear that the effect of observing a 15 minute period (double yellow lines), and a 1 hour period (single yellow lines) before removing a vehicle was generating unresolved safety issues and congestion on the borough's road network.. Following a recommendation from officers it was agreed that criteria for removing vehicles from yellow lines should be amended, reverting the minimum observation period back to 'instantly' removing vehicles from yellow lines. This change was implemented from the beginning of June. Appendix A records the approval given.
- 3.7 **June 2014.** The monitoring meetings noted that yellow line removals had returned to pre-pilot levels, but that new concerns had arisen regarding the non-removal of vehicles blocking access into resident driveways. Residents complained that they were unable to access their driveways when returning home, and were therefore forced to park on the public highway. Officers therefore recommended reintroducing the pre-existing methods for

this contravention type and this was agreed to be implemented from the beginning of June. Appendix B records the approval given.

- 3.8 **July onwards.** No further changes to the revised removal strategy were recommended by officers on the basis that no negative effects were noted operationally from the relaxation of the 11 other contravention types.

Overall Effect

- 3.9 In summary, from the point of view of service delivery, the effect of the pilot has been a success. There have been no notable adverse effects from ceasing removals from resident bays; officers have not received complaints about residents struggling to find available parking within CPZs.

- 3.10 Drawing from direct comparisons between the four months preceding the pilot, and the first four months of the pilot, officers have noted the following changes:

- An increase of 14% in vehicles being removed from yellow lines. This may be viewed as a positive effect of the pilot; by not deploying trucks to residential streets, there is an increased capacity to enforce yellow line offences and relieve congestion in the borough.
- A decrease of 97% in the number of vehicles removed from residential streets. The scale of the effect suggests that many of the vehicles being removed pre-pilot were first time contraveners rather than persistent evaders. Officers consider that a PCN is more appropriate in these circumstances and the new arrangements have reduced the risk of impounding those who made genuine mistakes of parking in the wrong zone, not fully understanding the visitor parking arrangements, or forgot to renew their resident permit, rather than customers who purposely avoid paying to park.
- An overall decrease of 45% in the volume of vehicles being removed to the Council's car pound (see table below).

	Yellow Line Offences	Paid For Parking Bay Offences	Resident Bay Offences	Driveway / Dropped Kerb Offences	Footway Parking Offences	Other Offences	Total
4 Months Before Trial	286	27	354	142	49	59	917
4 Months After Trial	327	2	12	96	9	61	507
% Increase/Decrease	14%	-93%	-97%	-32%	-82%	3%	-45%

- 3.11 Overall, it is now forecast that we will remove just over 2,000 vehicles in 2014/15 compared with 3,085 in 2013/14 and an average of 4,000 vehicles over the three years from 2010/11 to 2011/12. Based on the numbers of removals across London in 2013/14 this would have meant that Brent removed the tenth highest number of vehicles compared to our actual position in that year of removing the third highest number of vehicles. Officers plan to closely monitor the effects of the changes for the remainder of the year. Should further

alterations be required to maintain good operational/professional practice, officers propose to make changes in consultation with the Lead Member for Environment.

Proposed Customer Enhancements

- 3.12 Officers have noted the lack of signage for directing our customers to the Council's Car Pound at Whitby Avenue, Park Royal. Officers therefore proposed to erect new directional signage at the following locations: Abbey Road, at its junction with the North Circular Road; Abbey Road at its junction with Whitby Avenue; and Abbey Road at its junction with Coronation Road.
- 3.13 Officers note one of the potential benefits of the new Parking Permit database, is a more accurate record of customer contact details; particularly in respect of email addresses, and mobile telephone numbers. At the moment, customers who return to the place they left their vehicle, need to contact a service provided by London Councils, called TRACE, who will advise them of the location of their vehicle (if the Council have removed it). This can be a fairly stressful experience for the customer, who may think (in the first instance) that their vehicle has been stolen. Officers propose to use customer information more intelligently and where possible contact customers by email / text message to let them know that their vehicle has been taken to the car pound, directions to the car pound, opening hours, proofs required to release their vehicle, and payment information. This enhancement has been introduced from 15 September 2014

4.0 Visitor Scratch Cards

Background

- 4.1 In September 2012, the Council's Executive decided to adopt different methods of interacting with our customers. Principally, this meant replicating and improving the services we offered over the counter, with online services (and some telephone services).
- 4.2 At the beginning of 2013, the Council's parking shops closed, and the Council ceased selling its highest volume product; visitor scratch cards. The alternative, Virtual Visitor Parking Passes became the new method of booking visitor parking.
- 4.3 In order to make a clean break from the old method, and enable enforcement efficiencies (the new visitor parking system has an electronic link to enforcement systems), an expiry date was set for scratch cards to be removed from circulation.
- 4.4 As the Council did not possess extensive records relating to the volume of stock remaining in circulation, the Executive (July 2013) agreed to allow officers to implement a scratch card exchange scheme, in which, holders of scratch cards would be able to exchange them for visitor parking credit on the Council's new database.
- 4.5 Unfortunately, further investigation in partnership with Serco (the Council's principal parking contractor), proved that the cost of implementing an exchange scheme would outweigh the benefit, and there was a risk that some of our residents may miss the opportunity to take advantage of such a scheme. On this basis, a decision was taken to extend the validity of scratch cards to the 31st August 2014.
- 4.6 Surveys now indicate that the remaining stock of scratch cards is dwindling; fewer vehicles appear to be displaying the cards. Use of the online visitor parking system continues to grow, with in excess of 30,000 transactions per month. However, a number of scratch cards

are still being displayed, suggesting that the potential effect of invalidating their use may be negative, and create a sudden demand for refunds or exchanges.

- 4.7 Officers have tentatively revised the validity date extending scratch card validity to December 2014, but are now seeking to extend the validity of scratch cards indefinitely. There seems to be little merit in extending the scheme validity for short periods, when scratch card circulation will naturally reduce as users finish their stock.

5.0 FINANCIAL IMPLICATIONS

- 5.1 The financial implications for the service are significant, although they were anticipated when the pilot was envisaged.
- 5.2 In order to ensure good governance, the Council has carried out the following forecast of expenditure and income. It is not, however, an objective of the Council's civil parking enforcement policy to raise revenue.

Expenditure

- 5.3 The reduced income from fewer vehicle removals cannot be offset by an equivalent reduction in expenditure on the basis that the Council's removal operation had been designed against historical volumes of work and removal protocols. Many of the equipment costs, including the cost of providing removal trucks, are depreciated over the term of the enforcement contract. The Council also have commitments in terms of the Council's car pound at Whitby Avenue, which is leased by Contractors Serco, and shared with the London Borough of Hounslow.
- 5.4 Rather than reduce budgeted expenditure on removals, mainly made up of accommodation costs, and deployed hours, officers are working with Serco to identify further efficiencies in the Service; potentially using the trucks to perform additional functions, or shared duties.

Income

- 5.5 The relaxation of enforcement methods has generated a pressure in the parking account. The budgeted revenue expectations are based upon historical patterns, and the 2014/15 budget for vehicle removal income is £800k p.a. This revenue is anticipated from removal fees (£200 per removal) and storage fees (£40 per 24 hours).
- 5.6 The effects of the Pilot are demonstrated in the table below:

	Vehicles Removed	Receipts £	12m Extrapolation £
4 Months Before Trial	917	180,461	721,846
4 Months After Trial	507	104,580	418,320
% Increase/Decrease	-44.71%	-42.05%	-42.05%

- 5.7 The four months preceding the trial suggest that there were pre-existing pressures on the parking account of approximately £80k p.a. (as demonstrated in table 5.6; the budgeted figure of £800k minus £721k). Officers believe this to be a direct effect of a lower volume of on-street issuance in general terms; all enforcement activity is intrinsically linked. That is to say that the majority of removals are pre-identified by Civil Enforcement Officers rather than self-generated by the staff working on the truck.

- 5.8 The effect of the pilot has been to reduce the income generated from vehicle removal operations. The full year cost of this is estimated to be £303k. The total pressure on the account is therefore £382k.

Pressure

- 5.9 The Parking Account is performing well for the year to date, and may produce a modest surplus even with the forecast pressure on vehicle removal income. If the recommendations in this report are agreed, it is proposed that the Service manages the pressure for the remainder of the current year. For 2015-16 this income reduction of £303k would be additional growth for the Council's budget, and would add £303k to the Council's existing savings target of £33m for 2014-15 (which has not yet been bridged)

6.0 LEGAL IMPLICATIONS

- 6.1 The details of a local authority's power to remove illegally parked vehicles is set out in the following legislation:

- The Civil Enforcement of Parking Contraventions (England) General Regulations 2007 (SI 2007/3483);
- The Civil Enforcement of Parking Contraventions (Representations and Appeals) (England) Regulations 2007 (SI 2007/3482);
- The Removal and Disposal of Vehicles (Amendment) (England) Regulations 2007 (SI 2007/3484);
- The Traffic Management Act 2004.

- 6.2 Consideration also needs to be given to the Statutory Guidance from the Department for Transport which addresses the issue of the removal of vehicles by local authorities to enhance and improve the enforcement of parking regulations and the Penalty Charge Notice system, to assist payment of Penalty Charge Notices and to reinforce existing transport policies (for example, by targeting vehicle removal operations in bus lanes).

7.0 DIVERSITY IMPLICATIONS

- 7.1 The Council is mindful of its duty under s.149 Equality Act 2010 (the 'Public Sector Equality Duty'). In the present case, there are no adverse diversity or equality implications. In particular, there are no adverse issues affecting blue badge users or disabled people who rely heavily on their vehicles for mobility.

8.0 STAFFING / ACCOMMODATION IMPLICATIONS

- 8.1 None

BACKGROUND PAPERS

Event Day Parking and Vehicle Removals – Executive, 22nd April 2014

(<http://democracy.brent.gov.uk/documents/s23139/en-event-day-parking.pdf>)

Parking service simplification and pricing – Executive, 19th September 2012

(<http://democracy.brent.gov.uk/documents/s9446/ens-parking-permits.pdf>)

Statutory consultation on proposed changes to parking tariffs charges and permits – Executive, 15th July 2013

(<http://democracy.brent.gov.uk/documents/s18275/en-parking-consultation.pdf>)

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Strategic Director Environment and Neighbourhood Services

APPENDIX A

Event Day Parking and Vehicle Removals

Change Control 1

This document executes changes to the criteria used to guide the Council's parking contractor in respect of vehicle removal operations. Due to the variability of the new pilot approach, the impact on residents and the associated risks, it is proposed that adjustments to the pilot approach outlined in the Executive report be adjusted on the monitored outcome.

Review Period

May 2014

Commentary

The Head of Parking and Street Lighting has reviewed the impact of the pilot for the period 1st May 2014 to 31st May 2014 and concluded the effect of the pilot to date has been substantial. There has been a reduction in enforcement in almost all contravention types. The most significant reductions have been in the removal of vehicles from Resident Parking Bays and the removal of vehicles from Yellow Lines.

Proposed Changes

It is of note that the operational impact of the piloted changes on the removal of vehicles from yellow lines has detrimental traffic management (Network Management Duty) implications for the Council. The piloted change provides an observation period of an hour for vehicles parked on single yellow lines, and an observation period of 15 minutes on double yellow lines. Officers request that these observation periods are reverted back to 'instant' removal; the Council require to move dangerous/obstructive parking in the fastest possible time.

If agreed, this change shall be implemented from the 1st June 2014.

Proposal agreed by

Jay Judge
Interim Head of Parking & Street Lighting
Environment & Neighbourhoods



Michael Read
Operational Director, Environment & Protection
Environment & Neighbourhoods

APPENDIX B

Event Day Parking and Vehicle Removals

Change Control 2

This document executes changes to the criteria used to guide the Council's parking contractor in respect of vehicle removal operations.

Due to the variability of the new pilot approach, the impact on residents and the associated risks, it is proposed that adjustments to the pilot approach outlined in the Executive report be adjusted on the monitored outcome.

Review Period

June 2014

Commentary

The Head of Parking and Street Lighting has reviewed the impact of the pilot for the period 1st June 2014 to 30th June 2014 and concluded the effect of the pilot to date has been substantial. There has been a reduction in enforcement in almost all contravention types. The most significant reductions continue to be in the removal of vehicles from Resident Parking Bays, although the effect on the removal of vehicles from Yellow Lines has reduced since the last reporting period. Officers and their Contractor have also noted an increasing number of complaints generated from residents who are unable to access their driveway.

Proposed Changes

The pilot proposed changes to the criteria for removing vehicles blocking access to driveways; if residents are blocked into their driveways, the Council will provide a removal service, however, if residents are blocked out of their driveway the Council would not provide a service. This policy change has been to the detriment of our resident's experience from the Council's Parking Service. It is proposed that the Council re-establish the methods used before the pilot began. If agreed, this change shall be implemented from the 1st June 2014.

Proposal agreed by

Jay Judge
Interim Head of Parking & Street Lighting
Environment & Neighbourhoods



Michael Read
Operational Director, Environment & Protection
Environment & Neighbourhoods

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 Brent	Cabinet 13 October 2014 Report from the Strategic Director, Regeneration and Growth
Wards affected: Wembley Central, Tokyngton, Barnhill, Preston, Stonebridge	
Wembley Area Action Plan	

1.0 Summary

- 1.1 This report explains that the Council has received an Inspector's report into the Examination of the Wembley Area Action Plan Development Plan Document and that the Inspector finds the document sound subject to recommended changes being made. It asks Cabinet to recommend to Full Council that the Area Action Plan be adopted with the changes incorporated.

2.0 Recommendations

- 2.1 That Cabinet agree to recommend to Full Council that the Wembley Area Action Plan Development Plan is adopted with the recommended changes, as set out in Appendix 1.

3.0 Detail

Examination of the Wembley Area Action Plan

- 3.1 The reasons for producing the Wembley Area Action Plan (AAP) derive from the need to bring UDP policy, particularly the Wembley Regeneration Area chapter, first drafted in 2000 and adopted in 2004, up-to-date. It is a logical step in drawing up the folder of Development Plan Documents (DPDs) that will make up the borough's development plan and ultimately supersede the UDP. The UDP has in part been superseded by the Core Strategy and Site Specific Allocation DPD. The remaining saved UDP policies will be superseded following the adoption of the AAP, joint West London Waste Plan and Development Management Policies DPD.
- 3.2 The AAP also consolidates detailed policy and guidance currently contained in a number of documents, including the Wembley Masterplan 2009, the Wembley link SPD 2011 and the Wembley West End SPD 2008.

- 3.3 The AAP sets out the strategy for growth and regeneration in Wembley for the next 15 years. Wembley is a growth area and is expected to deliver 11,500 new homes and 10,000 new jobs. The AAP provides the details of what, where and how this growth will be delivered.
- 3.4 The AAP was subject to examination by an independent Inspector, who held hearing sessions to consider oral evidence in March 2014. A number of changes to the document were proposed both before and during the hearing sessions and these were made available during public consultation for a six week period commencing 15 May 2014. All comments were passed on to the Inspector who then considered these alongside the representations made prior to submission. The Council has now received the Inspector's report.

Inspector's Report

- 3.5 As indicated above, the Inspector has found the AAP sound subject to a number of recommended changes. This means that the Council can adopt the document with the changes incorporated. Planning Committee is asked to recommend to Cabinet and Full Council that the AAP be adopted with the changes included. The recommended changes included in the Inspector's report are attached as Appendix 1.
- 3.6 The Non-technical summary of the Inspector's report is repeated below:

This report concludes that the Wembley Area Action Plan Development Plan Document 2013 is sound, providing the Main Modifications, all of which have been requested by the Council. I have recommended their inclusion after considering the representations from other parties on these issues.

The changes required to meet legal and statutory requirements relate to a limited number of topics. The Main Modifications can be summarised as follows:

- *The Town Centres of Wembley and Wembley Park will have separate, though contiguous, boundaries;*
- *There is potential for the development of a food store north of Wembley High Road but south of the Chiltern Line Cutting rather than to the south at the Copland School Brent House site;*
- *Remove 'indicative' from all the housing capacities of the Proposal Sites;*
- *Changes to the housing capacities of several proposed housing sites to reflect planning permissions or to optimise the housing potential of the area;*
- *Clarification that all affordable housing subsidies released by the disposal of dwellings in intermediate housing tenures will be re-used for alternative affordable housing projects;*
- *Car parking standards will be applied other than in exceptional circumstances where the need for a higher level of provision can be demonstrated;*
- *Local transport corridor improvements will support non-car modes and local vehicular access including stadium events to assist event day transport;*
- *A transport assessment would be required if a proposal to remove the pedestrian ramp is considered as part of future development in the area;*
- *The Wembley Retail Park is to be a site which is 'Appropriate for Tall Buildings' to correct an error;*

- *Urban greening is to be sought rather than required in new developments;*
- *Major new developments are to be designed to connect to a decentralised energy heat network rather than energy centre;*
- *Flood risk assessments are to be required for sites of 1ha or more on land in Flood Risk Zone 1;*
- *Viability is to be taken into account in assessing the requirement for foot/cycle paths and contributions on sites requiring biodiversity improvements and flood risk adaptation in the Eastern Lands.*

None of the above changes alters the thrust of the Council's overall strategy for the regeneration of the Wembley area.

- 3.7 When the AAP is adopted, it will supersede the Wembley Regeneration Area chapter of the UDP, and the Wembley Growth Area chapter of the Site Specific Allocations DPD.

4.0 Financial Implications

- 4.1 A total sum of £120,000 has already been incurred from previous years Regeneration and Planning budget for the preparation and consultation of the AAP.
- 4.2 Additional costs of examining and finalising the AAP are estimated at about £60,000, required from 2014/15 Planning and Regeneration budget. This will be met from the allocated budget for special projects. If the AAP was not adopted and resubmitted a similar cost would be required.

5.0 Legal Implications

- 5.1 The preparation of the Local Plan, including the AAP, is governed by a statutory process set out in the Planning and Compulsory Purchase Act 2004 and associated Government planning guidance and regulations. Once adopted the AAP will have substantial weight in determining planning applications and will supersede part of the UDP and Site Specific Allocations DPD.

6.0 Diversity Implications

- 6.1 Full statutory public consultation has been carried out in preparing the AAP and an Impact Needs / Requirement Assessment (INRA), which assessed the process of producing the Local Plan, was prepared and updated as required during the process.

7.0 Staffing/Accommodation Implications

- 7.1 There are no staffing or accommodation implications arising directly from this report.

8.0 Environmental Implications

- 8.1 The AAP deals with the development of the Borough's main regeneration area and thus will have a significant effect on controlling impacts on the environment including requiring measures to mitigate climate change. Sustainability appraisal was undertaken at all stages of preparing the AAP.

9.0 Background Papers

Brent Site Specific Allocations Development Plan Document, 2011

Wembley Masterplan, 2009

Wembley Link SPD, 2011

Wembley AAP, Submission DPD, March 2013

Report to the Council of the London Borough of Brent, The Planning Inspectorate, 20 August 2014

Contact Officers

Any person wishing to inspect the above papers should contact Claire Jones, Policy & Projects, 020 8937 5301

Aktar Choudhury

Operational Director, Planning & Regeneration

ANDY DONALD

Strategic Director Regeneration and Growth

Appendix 1 – Inspector’s Recommendations

The modifications below are expressed either in the conventional form of strikethrough for deletions and underlining for additions of text, or by specifying the modification in words in italics. The page numbers and paragraph numbering below refer to the submission DPD (March 2013), and do not take account of the deletion or addition of text.

Ref	Page	Policy/ Paragraph	Main Modification
MM1	13	Para 2.8	Amend text as shown: <u>Most new</u> retail floorspace will be located in an extended Wembley town centre which will <u>adjoin</u> ~~connect the existing centres of Wembley and Wembley Park~~ <u>town centre</u> . The new designer outlet centre, next to the Hilton Hotel, includes around 85 shops, restaurants and cafés, and a nine screen cinema. A new pedestrian and cycle priority boulevard will create a link through the heart of the growth area to a new shopping street north of Engineer’s Way.
MM2	40	Map 4.4	<i>The area covered by Site Proposal W18 is to be shown as a Site Appropriate for Tall Buildings rather than a Site Sensitive to Tall Buildings.</i>
MM3	58	Para 6.25	Insert the following text after the final sentence of the paragraph: <u>There may be exceptional circumstances where it can be demonstrated, for example for reasons of maintaining town centre vitality and viability, that there is a need for parking provision above that normally allowed by the maximum standards, subject to the usual transport assessment.</u>
MM4	59	Policy WEM15	Amend the policy as shown: <u>The council will apply car parking standards in Wembley as set out in the tables above unless, in exceptional circumstances, it can be demonstrated that there is an overriding need for a higher level of provision.</u>
MM5	67	Map 6.3	Amend the legend of Map 6.3 where it shows ‘Corridor improvements to support non-car modes and local vehicular access’ by adding: <u>and local vehicular access including for stadium events.</u>
MM6	70	Policy WEM 18	Amend the policy as shown: The housing mix guidance provided in table 7.1 will be applied ~~in the relevant parts of Wembley~~ <u>to the Districts as defined by the map on page 132 of the Wembley Masterplan</u> . Additionally, new Affordable Rent that ~~meets~~ <u>addresses</u> the needs of households eligible for social housing, with eligibility determined with regard to local incomes and local house prices, will be ~~accepted~~ <u>encouraged</u> as part of the tenure mix. The council will encourage intermediate affordable housing tenures, such as discounted market sale products, where the council <u>or other registered providers</u> can secure future equity payments that can be recycled into new affordable

Ref	Page	Policy/ Paragraph	Main Modification
			housing. <u>The maximum amount of affordable housing, subject to viability and the achievement of other planning objectives, will be sought.</u>
MM7	76	Para 8.5	Amend text as shown: There are ~~no~~ <u>few</u> development opportunities identified within the centre itself - currently approved applications lie outside the town centre boundaries. <u>A small extension (shown on Map 8.1) is proposed for the town centre which will include Site W23 which is designated for ground floor retail uses. South of the centre, construction has started on a new Wembley designer outlet centre and cinema and food and drink complex alongside the new Wembley pedestrian boulevard. Also, in 2011 planning consent was granted for a new retail street which will link the Boulevard with Wembley Park centre. This will be a further extension of Wembley town centre as the new boulevard will extend from close to Wembley Stadium station eastwards to Engineers Way.</u>
MM8	76	Para 8.6	Insert additional text at the end of the paragraph: <u>New development which will expand the centre includes the Wembley designer outlet centre, cinema and food and drink complex alongside the new Wembley pedestrian boulevard. In 2011 planning consent was granted for a new retail street outside the existing town centres which will link the Boulevard with Wembley Park centre. The Wembley Area Action Plan will therefore extend Wembley town centre boundary northwards to reflect these permissions for new town centre development (shown on Map 8.1).</u>
MM9	76-77	Para 8.7	Insert additional text at the end of the paragraph: <u>The two centres of Wembley (Major centre) and Wembley Park (District centre) will continue to be considered as two separate centres, although the boundaries will be contiguous. The extension to Wembley town centre will strengthen its role as a Major Centre. The town centre hierarchy will remain in place until such time that any change in the role of the centres can be reflected in future alterations to the London Plan town centre network.</u>
MM10	78	Para 8.15	Amend paragraph heading: Expansion of Town Centres Delete ~~across the new part of the centre extending from the final sentence.~~
MM11	78	Para 8.16	Delete the word: ~~the~~ and insert: <u>Wembley</u> between 'expand' and 'town centre' in the first sentence.
MM12	78	Para 8.17	Amend as shown: The boundary of Wembley town centre defined in the Core Strategy takes account of, and includes, land where consents have been granted for retail

Ref	Page	Policy/ Paragraph	Main Modification
			expansion. This includes land at South Way close to Wembley Stadium station as well as the proposed outlet centre, cinema, etc., currently under construction to the west of the Stadium. However, since the Core Strategy was adopted in 2010, consent has been granted for a further 30,000 sq m of new floor space on the NW Lands to provide a new shopping street between the two centres. ~~When all schemes are implemented, there will be largely continuous active frontage from Ealing Road to Bridge Road. It is logical to define the town centre from Wembley Park to Ealing Road as shown on Map 8.1. The scale of proposed new development is in keeping with a major town centre and it is therefore logical to extend Wembley town centre to include this area (shown on Map 8.1).~~ This includes the office buildings and hotel on the east side of Olympic Way. ~~Within this,~~ The long-standing designated Primary and Secondary frontages will remain largely as currently defined for the present, although the council is committed to reviewing these once the new retail and leisure developments (Quintain stage 1 and North West Lands) are built out and open.
MM13	79 Also Also Also	Map 8.1 Map 2.1 Map 21.1 Map 21.2	<i>Delete the single town centre boundary for Wembley and insert tangential boundaries of the extended Wembley Park Town Centre and the extended Wembley Major Town Centre. Apply diagonal hatching to the extension to the Wembley Park Town Centre and vertical hatching to the extension to the Wembley Major Town Centre. Make corresponding modifications to maps 2.1, 21.1 and 21.2.</i>
MM14	87	Policy WEM30	Amend the policy to delete ~~energy centre~~ and insert <u>heat network</u>
MM15	88	Policy WEM32	Amend the policy as shown: Development proposals <u>should</u> ~~must~~ incorporate urban greening measures such as green roofs, green walls, trees and soft landscaping. Wherever possible, opportunities to connect new green spaces to existing green spaces should be maximised to help create green infrastructure. Where site constraints limit the level of urban greening that can be provided on site, a financial contribution ~~will~~ <u>may</u> be required. Local food growing facilities will be supported as stated in (~~see~~ ~~policy WEM 38 36~~ in the Open Space chapter).
MM16	89	Policy WEM33	Amend policy WEM 33 by inserting text as shown: All proposed development in Flood Zones 2 and 3, <u>and proposed developments over 1 ha in flood zone 1,</u> will require a detailed Flood Risk Assessment (FRA), in accordance with Section 6.7 of Brent's Strategic Flood Risk Assessment.
MM17 Also	102 103	Site Proposal	Delete the word ~~indicative~~ from the development capacity for each of these site proposals.

Ref	Page	Policy/ Paragraph	Main Modification
			scale of development that would be appropriate. Consequently, only a limited development can be accommodated.
MM21	104-105	Site W4	Amend paragraph 2 of the Site Proposal, as shown: The council's objective is to transform the Wembley Link area into a sustainable mixed use community. This would be best delivered through developing the concept for cafés, restaurants and bars and appropriate retail, <u>including potentially a food store. along the frontage.</u> , ~~potentially with Office-~~ <u>Residential development should form part of any mixed use scheme. above these, and residential above this, where appropriate.</u> <u>Offices,</u> student accommodation or hotel would also be appropriate within this site. Development proposals should include active frontages.
MM22	105-106	Site W5	Amend Site Proposal W5, as shown: The ground floor on the High Road frontage should be commercial retail development, ~~potentially including a medium-sized food store (approximately 6000m²)~~ with associated car parking. Residential development either above or adjacent to the retail should include a high proportion of family housing.
MM23	108-109	Site W6	Amend the Development Capacity for the site as shown: ~~264~~ <u>400</u>
MM24	111	Site W9	Amend the Development Capacity as shown: ~~60~~ <u>100</u> units
MM25	113	Site W12	Amend the Development Capacity as shown: ~~815~~ <u>1300</u> units
MM26	113-114	Site W13	Amend the Development Capacity as shown: ~~50~~ <u>100</u> units
MM27	117-118	Site W18	Amend the Development Capacity as shown: ~~500~~ <u>700</u> units
MM28	118	Site W19	Insert: Development Capacity: 1500 units
MM29	125	Site W25	Insert at the end of the 3 rd paragraph of the site proposal: <u>The viability of development will be taken into account in assessing the appropriate width of the buffer strip and the level of contribution towards restoration work.</u>
MM30	126	Site W26	Insert after: '... will be required to contribute towards the restoration work.' <u>The viability of development will be taken into account in assessing the appropriate width of the buffer strip and the level of contribution towards restoration work.</u>
MM31	127	Site W27	Insert at the end of paragraph 4: <u>The viability of development will be taken into account in assessing the appropriate width of the buffer strip and the level of contribution towards restoration work.</u>
MM32	156	Para 21.1	Amend as shown: The following maps show the detailed changes to the ~~Proposals Policies~~ Map as a result of the Wembley Area Action Plan. These include the extensions to Wembley and Wembley Park town centre boundaries ~~y~~

Ref	Page	Policy/ Paragraph	Main Modification
			~~extension which combines Wembley and Wembley Park into one town centre~~ , release of two sites from the Strategic Industrial Land <u>Location</u> (SIL), and the SIL area proposed for change from Preferred Industrial Land to Industrial Business Park.
MM33	61	Para 6.40	Amend as shown: The needs of spectators coming to the Stadium are also important. There are still some locations where there is potential conflict between crowds and traffic, such as along Wembley High Road and the crossing of Wembley Hill Road by the White Horse Bridge. The option to remove the pedestrian ramp over Engineers Way to the Stadium from Olympic Way and replace it with steps could be considered as part of future development. This would mean, however, that <u>a transport assessment would be required to assess the impacts, and to highlight the interventions which would be necessary to mitigate them to ensure the continued safe and efficient movement of people to and from the stadium. The assessment should include, among other options, consideration of whether an alternative east – west through-route for vehicular traffic would be needed. especially for event days.</u> The council supports the removal of the pedestrian ramp and its replacement with an improved access arrangement between Olympic Way and the Stadium providing that access to the Stadium and emergency egress are integral to the design, and that any changes help address what is currently a poor street environment.

 Brent	Cabinet 13 October 2014 Report from the Strategic Director, Regeneration and Growth
Wards affected: Sudbury	
Sudbury Town Neighbourhood Plan	

1.0 Summary

- 1.1 This report provides an overview of the process which Sudbury Town Residents Association has followed to date in producing the draft Sudbury Town Neighbourhood Plan, and a summary of its content. It recommends that the draft Plan be published on 23 October 2014 and made available for comment for 6 weeks. It is also recommended that it be submitted for examination subject to Full Council approval.

2.0 Recommendations

- 2.1 That the draft Sudbury Town Neighbourhood Plan be agreed for publication and public consultation from 23 October 2014 for 6 weeks, and that Cabinet recommend that Full Council agree that the draft Plan be submitted for independent Examination.
- 2.2 That the Head of Planning be given delegated authority to deal with any representations received during the statutory consultation period.

3.0 Detail

- 3.1 Neighbourhood Planning was introduced through the Localism Act 2011 ("The Act") and is one of the central elements of the Localism process. Section 116 of the Act and Schedules 9, 10 and 11 provide the legislative framework for neighbourhood planning. Essentially it enables communities to develop planning policies (otherwise known as 'Neighbourhood Development Plans' within the meaning of Part 2 Schedule 9 of the Act as inserted by section 38A of the Planning and Compulsory Purchase Act 2004 but for the purposes of this report shall be cited as "The Neighbourhood Plan") that will become part of the planning framework for their area. Neighbourhood planning is delivered by 'neighbourhood forums' for their 'neighbourhood area'. Neighbourhood forums and areas need to be agreed by local authorities, following local publicity requirements.
- 3.2 In 2011 Sudbury Town Residents' Association successfully applied for £22,000 'frontrunner' money which they used to engage consultants (SKM Colin Buchanan) to

produce an Issues Paper for the area. In August 2012, the Association applied to become a neighbourhood forum and to have Sudbury Town designated as a neighbourhood area. In accordance with Parts 2 and 3 of the Neighbourhood Planning (General) Regulations 2012 ('The Regulations' – in force 6 April 2012), the Council publicised the applications for a 6 week consultation period ending on 19 October 2012. No representations were received. On 12 December 2012 the Council approved the designation of Sudbury Town Neighbourhood Forum and Neighbourhood Area.

- 3.3 The forum undertook a series of consultation events and exercises between May 2012 and March 2014, as outlined in their Consultation Statement. This included consultation on an Options Report during November and December 2013, and consultation on the Draft Neighbourhood Plan for a 6 week period during January and March 2014. The consultation undertaken informed the draft Neighbourhood Plan which was formally submitted to the Council on 12 August 2014.
- 3.4 The vision of the Neighbourhood Plan is 'to create a greener, cleaner, safer Sudbury Town Centre, with a High Street to match, and at the heart of the community that we can all be proud of.' The Plan contains six key planning policies. In summary these are:-
- STNP 1 seeks to promote a mix of uses within Sudbury town centre which will support the viability and attractiveness of the centre.
 - STNP 2 sets design criteria for the continuation of public realm works.
 - STNP 3 sets design criteria for shopfronts within the Plan area.
 - STNP 4 seeks to protect open spaces and allow the reuse or redevelopment of buildings within Butlers Green and Barham Park, for uses which support the function of the green space.
 - STNP 5 sets priorities for spending Neighbourhood CIL, including public realm improvements.
 - STNP 6 identifies uses which will be appropriate in Sudbury town centre and support development that strengthens Vale Farm as a regional centre for sports excellence, whilst preserving open space.
- 3.5 In addition, items that the community are seeking, but that cannot be delivered through planning policy are identified as aspirations.
- 3.6 The Council's role has been to provide the forum with guidance in meeting the statutory requirements and following the correct process in producing a Neighbourhood Plan. The Council is required to perform this role keeping within the spirit of the Act and associated regulations. The Council considers these policies to be consistent with Brent's strategic policies, regional and national policy, however, this is to be determined by an independent examiner.

Procedural Steps

- 3.7 A flow diagram summarising the process followed to date and the next steps to be undertaken is included in appendix A. For clarity, any reference to 'LPA support' or 'Brent support' in the flow chart or the draft neighbourhood plan refers to support provided to the forum in meeting statutory and procedural requirements. Following the

formal submission of the Sudbury Neighbourhood Plan and supporting documents, the Council has assessed the Plan against the relevant statutory requirements. The Council is therefore satisfied that the Neighbourhood Plan and process followed in respect of that complies with the statutory requirements as more particularly detailed in paragraph 6 of Schedule 4B of the Town and Country Planning Act 1990 (as amended).

- 3.8 To allow the Neighbourhood Plan to progress, approval is sought to publicise the Plan for a 6 week period in accordance with Regulation 16. The Council must publicise details of the plan on its website and in the local press, as well as make it available for inspection at its offices to ensure that people who live, work and carry on business in the neighbourhood area are able to view it and make representations accordingly. Following this period the Council, with agreement from the forum, must select and appoint an independent examiner to Examine the Plan.
- 3.9 Subject to the examiner concluding that the Plan meets the basic conditions it will undergo a referendum. The Council must have regard to the requirements of the Neighbourhood Planning (Referendums) (Amendment) Regulations 2013 when delivering this process. A person is entitled to vote if at the time of referendum, they live in the neighbourhood area and meet the eligibility criteria to vote in a local election. If more than 50% of people voting in the referendum are in favour of the Plan then the Plan is made (given legal effect) by the local planning authority. The only circumstance where the local planning authority is not required to make the Plan is where it would breach, or otherwise be incompatible with, European or Human Rights obligations.
- 3.10 Once the Neighbourhood Plan is adopted it will form part of Brent's Local Plan and the six planning policies referred to at paragraph 3.4 above will be considered as material considerations in determining planning applications in the neighbourhood area. The aspirations identified in the Plan are to be taken forward by the forum.

4.0 Financial Implications

- 4.1 The expenditure for this project is entirely grant funded by the DCLG. The Council is committed to provide officer time only. The Council was awarded £10,000 to support the preparation of the Plan. This money has been received from the DCLG and spent. A further payment of £5,000 is made when the Plan is publicised prior to Examination, application for this sum will be made to the DCLG in October 2014 for reimbursement. A further £20,000 will be paid by the DCLG on successful completion of an Examination into the Plan. This is towards the cost of Examination and referendum. The budget is managed by the policy team within Planning and Regeneration.

5.0 Legal Implications

- 5.1 Contained within the body of this report

6.0 Diversity Implications

- 6.1 There is a requirement for the Council to ensure that, in granting neighbourhood forum and neighbourhood area status, those applying are representative of the area covered. Sudbury Neighbourhood Forum satisfied this requirement.

7.0 Staffing/Accommodation Implications

- 7.1 Staff resources will be diverted from other plan making projects to provide support and advice.

8.0 Environmental Implications

- 8.1 A Strategic Environmental Assessment (SEA) Screening Opinion was produced in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 and concluded the Plan is unlikely to have significant environmental effects. The Basic Conditions statement outlines how the Plan will contribute to sustainable development.

9.0 Background Papers

Sudbury Town Neighbourhood Plan, Draft Final, July 2014

Sudbury Town Neighbourhood Plan: Basic Conditions Statement, July 2014

Sudbury Town Neighbourhood Plan: Consultation Statement, July 2014

<http://brent.gov.uk/services-for-residents/planning-and-building-control/planning-policy/neighbourhood-planning/sudbury-town-residents-association/>

Contact Officers

Any person wishing to inspect the above papers should contact Claire Jones, Policy & Projects, 020 8937 5301

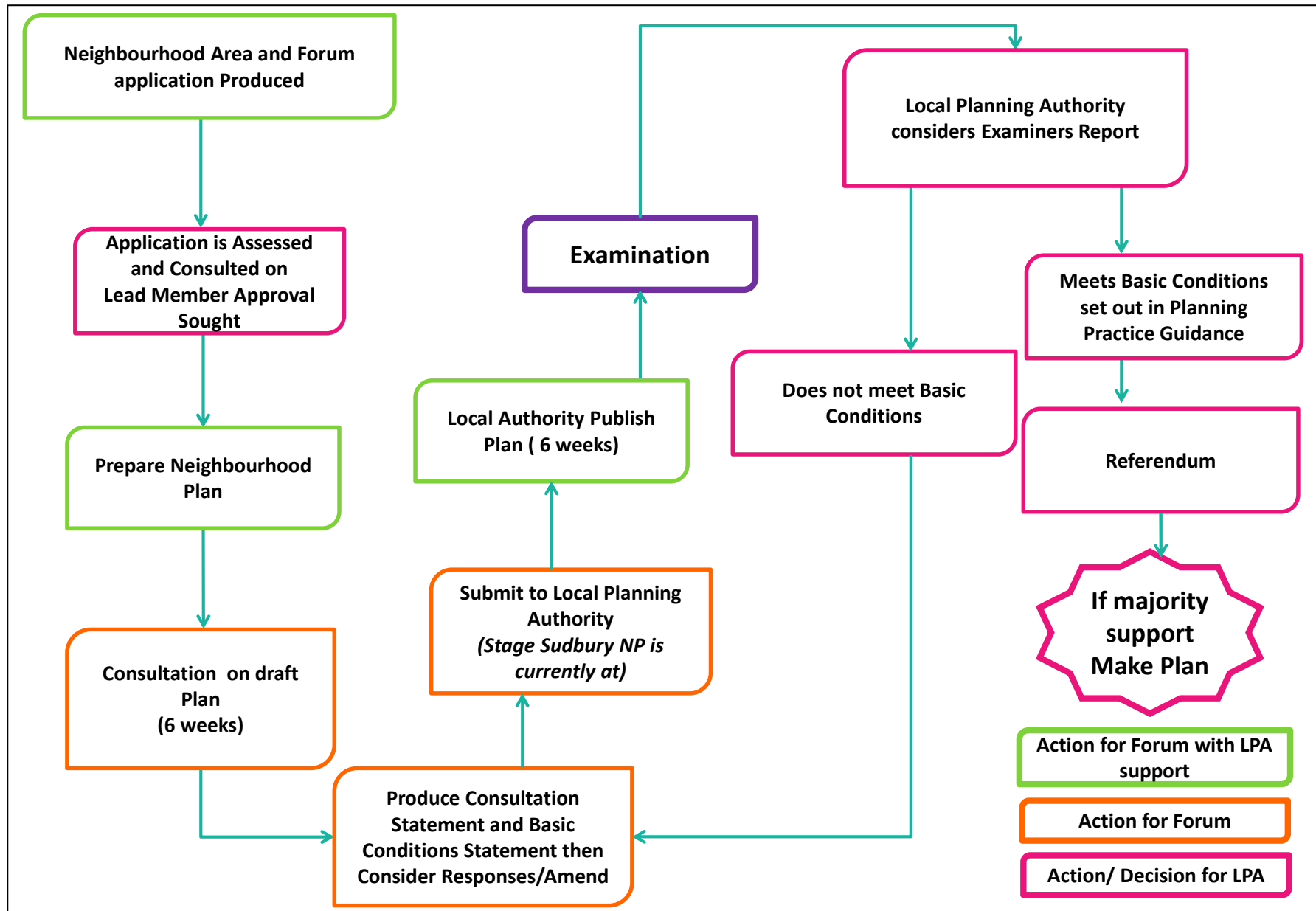
Aktar Choudhury

Operational Director, Planning & Regeneration

ANDY DONALD

Strategic Director Regeneration and Growth

Appendix A: Flow Diagram summarising the Neighbourhood Planning process



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DRAFT FINAL

SUDBURY TOWN NEIGHBOURHOOD PLAN

JULY 2014

Regulation 15 of the Neighbourhood Planning (General) Regulations 2012

THE
PROPOSED

SUDBURY
TOWN

NEIGHBOURHOOD PLAN

Our vision is:

“A GREENER, CLEANER, SAFER
SUDBURY TOWN, WITH A HIGH
STREET AT THE HEART OF THE
COMMUNITY THAT WE CAN ALL
BE PROUD OF”

Sudbury Town Neighbourhood Plan

Regulation 15 of the Neighbourhood Planning (General) Regulations 2012

Draft Final Neighbourhood Plan

July 2014



neighbourhood
planning



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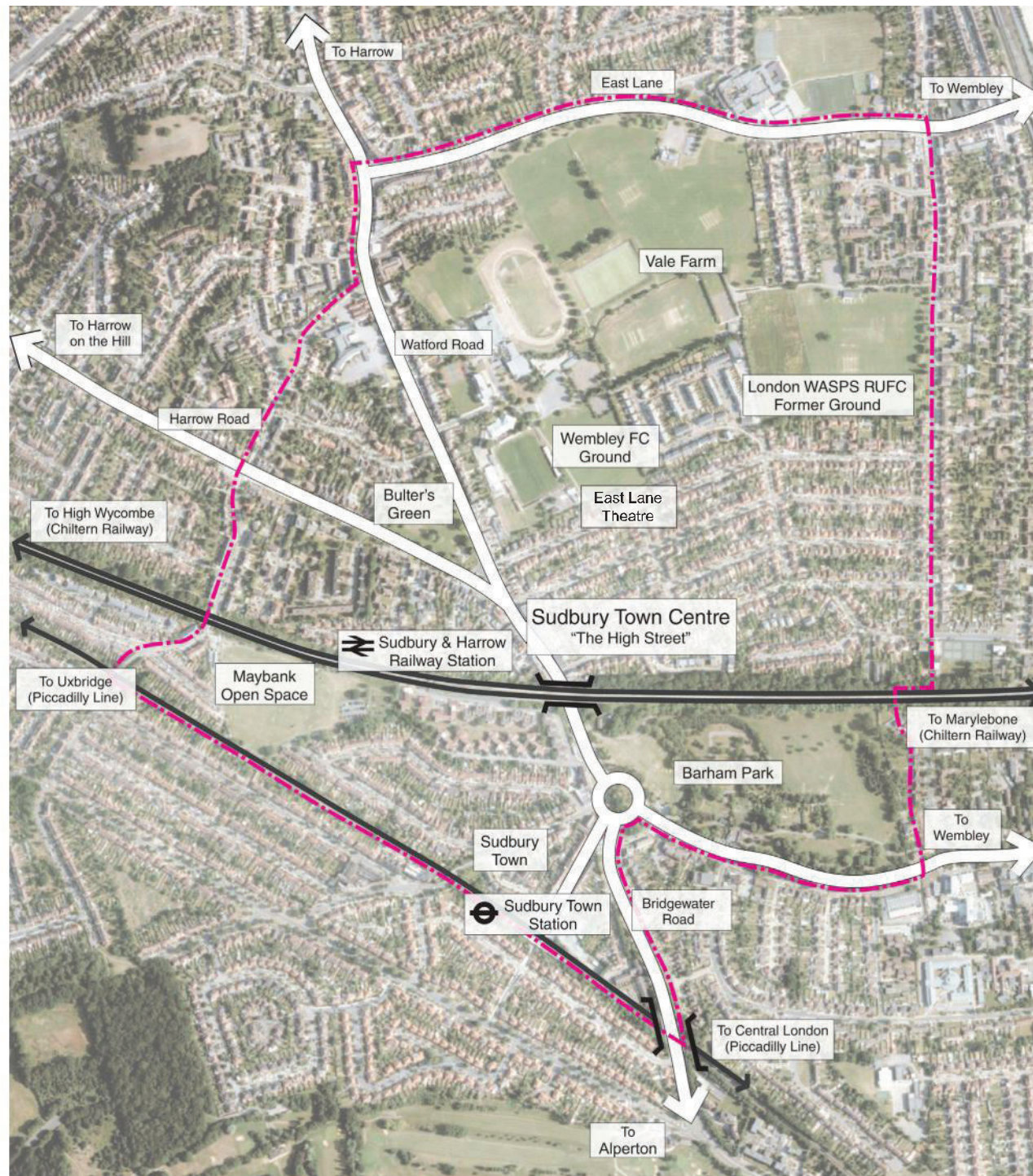




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Figure 1: The neighbourhood plan area





FOREWORD

Residents commuting together from work to home through the streets of Sudbury refused to let their community and high street slide further into decay with streets peppered with red stains of paan spitting and litter. The overwhelming response was to form a residents' association to bring about a much needed change to Sudbury.

The Sudbury Town Residents' Association (STRA) was formed over three years' ago with just eight local residents. They worked hard to encourage other like-minded residents to come together to form a community association and drive forward a plan to improve the area. STRA now has over 150 members. The first meeting was held in February 2011 where officials were appointed and sub-committees were formed to tackle key issues, and by June 2012 they had organised a huge party to celebrate the Queen's Diamond Jubilee. It brought the community together as thousands of people walked behind a military band through Sudbury High Street to the party in Barham Park.

Although this was the first visual opportunity to showcase STRA's commitment to the community, the executive committee and members have been working tirelessly behind the scenes to improve the problems of litter, paan spitting, rubbish dumping and anti-social behaviour around our streets, liaising with local councillors, the Safer Neighbourhood team and council services.

By December 2012, the hard working committee, supported by London Borough of Brent, achieved the Neighbourhood Forum status and was awarded funding to help prepare a neighbourhood plan. STRA was the first Residents' Association in Brent and one of the very few in the London Boroughs, to be awarded this accolade.

One of the first assignments to be achieved in the consultation period (which members participated in), was to be part of the implementation of upgrading the high street which included the removal of excess street furniture, the laying of new pavements and the inclusion of beautiful trees which has already made a difference to the feel of the high street for residents, shopkeepers and visitors alike.

We hope to encourage local businesses to come on board and be involved with the process of improving Sudbury.

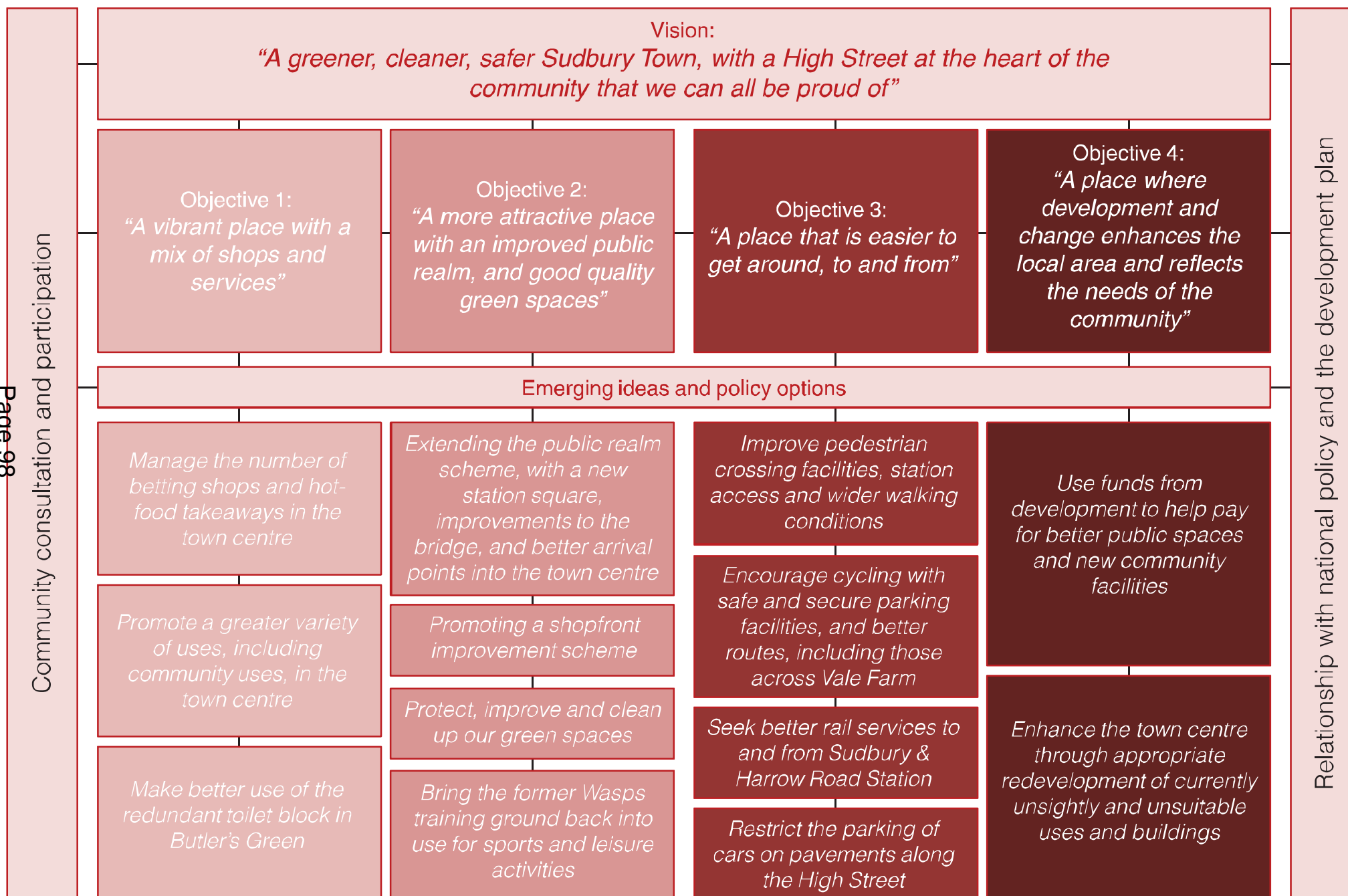
STRA is pleased to present our Draft Neighbourhood Plan which has been prepared with the input from STRA members, local residents and businesses within the Sudbury Town Neighbourhood forum area.

Our thanks go to all those who gave up their time to make their voice heard in this plan to bring positive change to Sudbury, especially Renu Kaul Vice Chairperson of STRA for her determination to see Sudbury not only a place that is greener, cleaner and safer but also complete with top quality High Street with further development potential.

We are also grateful to London Borough of Brent's Planning Department for their invaluable support and guidance in this journey.

Join us, make your voice heard and help bring change to Sudbury Town.

STRA
July 2014





EXECUTIVE SUMMARY

The neighbourhood plan

Neighbourhood planning provides an excellent opportunity for us, the local community, to shape the future of Sudbury Town. It can help us **influence what changes and improvements we think are necessary to make Sudbury Town a better place to live and work**. It puts us in the driving seat.

For over a year and a half residents and businesses have come together at a series of events to discuss ideas for the neighbourhood plan. We have turned these ideas into draft policies presented in this document. Now we would like your feedback on these policies which will eventually be used to shape and determine future planning proposals and applications for the area.

The neighbourhood plan is being led by the Sudbury Town Residents' Association (STRA), who in December 2012 was formally designated as the neighbourhood forum for the area. Through this, STRA is recognised by Brent Council as being an appropriate body to develop a new plan, being representative of the community. This represents a major step for the area and for Brent Council: STRA was the first neighbourhood forum to have been designated in Brent, and Sudbury Town is one of only a handful of areas in London where a neighbourhood plan is being prepared.

The focus of the neighbourhood plan is on the town centre: essentially that area between Barham Park and Butlers Green. The plan area is wider than this though: it includes Vale Farm and Sudbury Town tube stations for example (see figure 1). We would encourage everyone who lives in the area to view the plan and let us have their comments: it really is an exciting opportunity for the community to collectively make a positive change for the future.

Vision and objectives

Through the consultation events undertaken we have developed a vision, objectives and series of ideas for change and improvement. These include improvements to the quality of our streets and spaces, a better mix of shops, improved green spaces, better conditions for pedestrians and cyclists, and promoting the redevelopment of existing inappropriate town centre uses to enhance the High Street and provide better facilities for local people. The intention is to deliver these objectives by 2026, which is the timeframe for the Council's Local Plan.

These ideas are summarised below, with more detail presented in the main report. The main report includes a series of policies relating to our ideas: please do let us have your thoughts on these.

It is only by working together that we can make a stronger plan for Sudbury Town, one that can really influence a positive future for the area.

We want as many people as possible to be involved in the neighbourhood plan – and to be as excited by it as we are. This is an excellent opportunity for us to make a real difference in Sudbury Town.

Our policies and aspirations

Objective 1: Shops and services

We would like to see a better mix of shops, and other community uses on the High Street. The community has raised concerns with regard to the number of betting shops and hot-food takeaways in the High Street. Although difficult to change what is there at present, we propose a policy to better manage what uses are allowed in the future.

Objective 2: Public Realm

The street and pavement improvement works that have recently been undertaken along the High Street are an excellent start for Sudbury Town. They have really made a difference: the town centre is now looking a more attractive place to be, to spend time and money. We think more can be done though.

The gateways to the town centre could be improved, with **better landscaping, lighting and maintenance**, particularly at the roundabouts and the railway bridge.

The quality of the shop fronts on the High Street could be improved, with a consistency of approach to signage and materials enhancing the quality and attractiveness of the town centre.

Our green spaces are real assets and we wish to protect them for the future, but think they could be made even better. **The toilet block at Butlers Green could be reused** for a market, cafe or events space. **Buildings in Barham Park could be used for community facilities**, such as a library and adult education. The local ecology and habitats for local wildlife in the park could also be improved.

In Vale Farm we have one of the largest cluster of sports facilities and playing fields in north London. But the facilities are a little dated: **Vale Farm could be promoted and transformed into a regional centre for sports excellence**, building on the Olympic legacy.

We would also like to see the former **Wasps training ground open again for sports and leisure use**. This is part of the lease, but it is currently off-limits and becoming overgrown.

Finally, we think the land to the rear of the houses on Chilcott Close needs to be better managed: it is currently a location for fly-tipping. It

may be possible for ownership be transferred to the neighbouring residents to take responsibility for it.

Objective 3: Access and movement

We think it is important to **promote better walking and cycling conditions, improving access for everyone in society**. Better pedestrian conditions should be provided through the public realm works, including **better crossings** – particularly across to the green spaces - **new arrival spaces and squares** outside the tube and railway stations, and **a better environment under the railway bridge**.

New cycle routes and facilities should be provided in Sudbury Town too, across Vale Farm and through the town centre, including possible changes to the size and configuration of the Bridgewater Road roundabout to make it safer for pedestrians and cyclists.

We will also **campaign for improved services from the railway station** and look to ensure that any proposals for new development fully consider car parking provision.

Objective 4: Development and change

New development can help meet our objectives for the area, contributing funds to public realm improvements, shop fronts and provision of new community facilities.

We think that over time existing uses in the town centre that are not considered traditional town centre uses, such as the car showrooms, could be reused for a **more appropriate set of uses for the high street**, including retail and community uses and, on the upper floors, new homes or offices. Where development does take place it should respect the existing scale of buildings in the area and contribute to a better environment for everyone.

1. INTRODUCTION

Welcome to the Sudbury Town neighbourhood plan

The Sudbury Town Neighbourhood Plan sets out the local community's aspirations for Sudbury over the period to 2026. It establishes policies in relation to land use and development. It is these policies that will influence future planning applications and decisions in the area. But the neighbourhood plan is much more than this. It represents the communities manifesto for the area, bringing together more than just traditional planning matters. The focus of the neighbourhood plan is the town centre, though it extends to include Barham Park, Sudbury Town underground station, Butlers Green and Vale Farm (see figure 1).

The purpose of neighbourhood planning is to give local people and businesses a much greater say in how the places they live and work should change and develop over time. Neighbourhood planning is designed to give local people a very real voice in deciding the look and feel of an area, from determining the location of shops, offices and schools for example, to identifying sites and development standards for new housing.

The neighbourhood plan for Sudbury Town is helping to bring us together as a stronger, more inclusive community. We have spoken to many people through the process of making this plan. We have real pride in the way the community has come together. We are passionate about Sudbury Town and hope the neighbourhood plan will influence change that makes it a better place to live, grow up, work and do businesses. We hope the neighbourhood plan will help us achieve these goals.

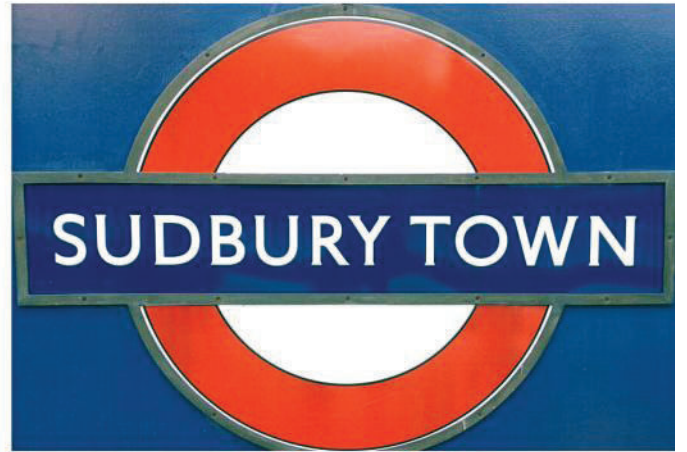
Draft final neighbourhood plan

This document is the Draft Final Neighbourhood Plan, which will be submitted to Brent Council in line with Regulation 15 of the Neighbourhood Planning (General) Regulations 2012.

This report has been informed by extensive consultation with the community on the issues and opportunities in the area, people's vision for the future of the area, an Options Report identifying what and how people would like to see aspects of Sudbury Town improved and a Consultation Draft Report which set out the policies and proposals for the area.

Figure 2: Consultation on the options report at Vale Farm, November 2013







Structure of the neighbourhood plan

This document comprises five sections. Following this introduction it comprises four more chapters. These are:

- Chapter 2: The neighbourhood plan area. This presents an overview of the extent of the study area and key features or areas of focus within it.
- Chapter 3: Sudbury Town Today, or, 'The Issues'. This chapter reports on the consultation undertaken and what we have been told so far.
- Chapter 4: Sudbury Town Tomorrow, or, 'The Policies'. This presents a vision, objectives and policies for Sudbury Town.
- Chapter 5: What happens next? This runs through the next steps in the production of the plan.

Chapter 4 groups the neighbourhood plan policies by the community objectives. Each sub-section includes some introductory and explanatory text followed by one or both of the following:

POLICY BOX

The neighbourhood plan establishes land use and development management policies for Sudbury Town. These are identified in policy boxes, like this one.

ASPIRATIONS BOX

The Neighbourhood Plan covers more than just traditional planning matters as it presents the community's vision for the area. Items that the community are seeking, but that cannot be delivered through planning policy are identified in aspiration boxes, like this one.



Who has developed the plan?

Work on the plan has been led by the Sudbury Town neighbourhood forum with support from Brent Council.

The Localism Act 2011¹ gave communities the power to develop neighbourhood plans, to be progressed by Parish Councils or neighbourhood forums as opposed to the local authority. In areas where there is no Parish Council, neighbourhood forums should be set up to prepare the plan. The forums should be representative of the community. In Sudbury Town, the Sudbury Town Residents' Association (STRA) was formally approved as the neighbourhood forum in December 2012.

STRA was established in February 2011 with its mission statement a Safer, Greener and Cleaner Sudbury, which clearly puts across what STRA wishes to achieve. STRA ensures that every member has the opportunity to be informed on the process and progress of the Neighbourhood Forum and have endeavoured to encourage and invite local businesses to become part of this movement for change and productive use of land.

Sudbury Town is leading the way

In advance of the Localism Act being granted royal assent, central Government invited bids from communities to act as pilots and test this new approach to plan making. These pilot areas are known as the 'frontrunners'. Each of the frontrunners was awarded £20,000 by the Department of Communities and Local Government (DCLG) to contribute towards preparing a neighbourhood plan. Sudbury Town is one of the frontrunners. It is one of only a handful of frontrunners in London and the only one in Brent.

This funding paved the way for the local residents and the business community in Sudbury Town to work together in preparing a neighbourhood plan. Upon being awarded funding, STRA Chair said:

'STRA are delighted to win this joint bid with Brent Council. We can now set about delivering a neighbourhood plan for Sudbury Town that reflects the desires and wishes of both the residents and businesses living and working in the community.'

'To win the funding allows the STRA to continue its efforts in placing the community in the driving seat and sets a future direction for generations to come in making our neighbourhood more responsive to our community needs.'

¹ See: <http://www.legislation.gov.uk/ukpga/2011/20/contents/enacted>² DCLG, March 2012, National Planning Policy Framework (NPPF)



What is in the neighbourhood plan?

Neighbourhood plans can take many different shapes and forms. They can set out detailed policies and allocate sites for development, they can present generic principles for an area and they can focus on a particular theme or issue. There is no prescribed format.

This Draft Final Neighbourhood Plan for Sudbury Town has been informed by the community through engagement and consultation exercises.

In Sudbury Town, we think there are opportunities to improve the look and feel of the town centre, the shops and services within it, to enhance the quality of green spaces and, should proposals come forward, to promote development that contributes towards improving the area. Locally specific policies and proposals in the neighbourhood plan will direct what change should happen where.

“...changing the image of the town centre must be a priority...”

How does the plan differ from existing planning policy?

Existing planning policy for the area is set out through a combination of national planning policies (see the National Planning Policy Framework: NPPF²), the London Plan³ and the Brent Core Strategy⁴.

These provide strategic policy directions, but, there is very little planning policy at present that is specific to Sudbury Town. The neighbourhood plan will present locally-specific policies and proposals that will help shape the future of Sudbury Town.

The neighbourhood plan needs to have regard to national policy and be in general conformity with the strategic objectives of the development plan. For Sudbury Town, the development plan comprises the London Plan and Brent Core Strategy.

The final neighbourhood plan will be subject to an independent examination. An inspector will be appointed to determine whether the neighbourhood plan is in general conformity with the London plan and the Brent Core Strategy. If he or she is satisfied that it is, the neighbourhood plan will then be subject to a referendum.

At the referendum, all people of voting age residing within the plan area will be able to cast a vote on whether they think the neighbourhood plan should be brought into force. If more than 50% of people vote yes, it will then be used to shape planning decisions and applications in Sudbury Town. It will sit alongside the Brent Core Strategy.

² DCLG, March 2012, National Planning Policy Framework (NPPF)

³ GLA, October 2013, The London Plan: Spatial development strategy for Greater London

⁴ Brent Council, July 2012, Core Strategy (See: <http://www.brent.gov.uk/services-for-residents/planning-and-building-control/planning-policy/local-plan/>)

What is the process for preparing the neighbourhood plan?

There are a number of stages involved in preparing a neighbourhood plan. Broadly, they include:

- a) Initial consultation to identify issues, concerns and areas of focus for the neighbourhood plan.
- b) Collection of 'evidence' on the issues and potential options, ideas and strategies to be progressed through the Plan.
- c) Production of and consultation on the 'Issues and Options'.
- d) Drafting and consultation on a preferred strategy for the neighbourhood plan.
- e) Review the neighbourhood plan to see whether it is general conformity with the strategic objectives of the development plan and prepare a version for pre-submission consultation (current stage).
- f) Submit and test the neighbourhood plan through an independent examination process.
- g) Subjecting the neighbourhood plan to a local referendum.
- h) Adopting ('making') the neighbourhood plan as a policy document – if more than 50% of people vote 'yes' at the referendum.

More information on the neighbourhood planning process can be found on the DCLG website⁵. The Sudbury Town neighbourhood plan is now ready to be reviewed by Brent Council to confirm general conformity with the development plan. A statement to this effect has been prepared by the STRA in the form of the Basic Conditions Statement which sits alongside the neighbourhood plan.

⁵ See <https://www.gov.uk/neighbourhood-planning>

The formal consultation process

Once this document is submitted to Brent Council it will be made available for comment for a period of six weeks. Brent Council will publicise details of where the document can be inspected and how representations can be made.





2. THE NEIGHBOURHOOD PLAN AREA

Boundary

The boundary of the Sudbury Town neighbourhood plan runs along East Lane at its northern most point, down Sudbury Avenue to the east, along Harrow Road to the south, where it kinks down along Bridgewater Road to the Piccadilly tube line. It then follows this up to The Rise, whereupon it follows Maybank Avenue and Elms Lane to form the western boundary (figure 1).

This boundary was drawn for the purposes of the bid to DCLG for frontrunner funding. It has since been formally approved by Brent Council as being appropriate for plan making purposes.

The boundary has been used for consultation purposes and, if and when the neighbourhood plan progresses to a referendum, will be used as the area within which residents and businesses will be invited to vote on the plan.

The drawing of the boundary does not mean that the neighbourhood plan will address all planning matters within it. Matters such as residential extensions for example will still be subject to normal planning procedures set out in the Council's Core Strategy. What the boundary does do is place the town centre at the heart of the study area. This is the primary focus of the neighbourhood plan.

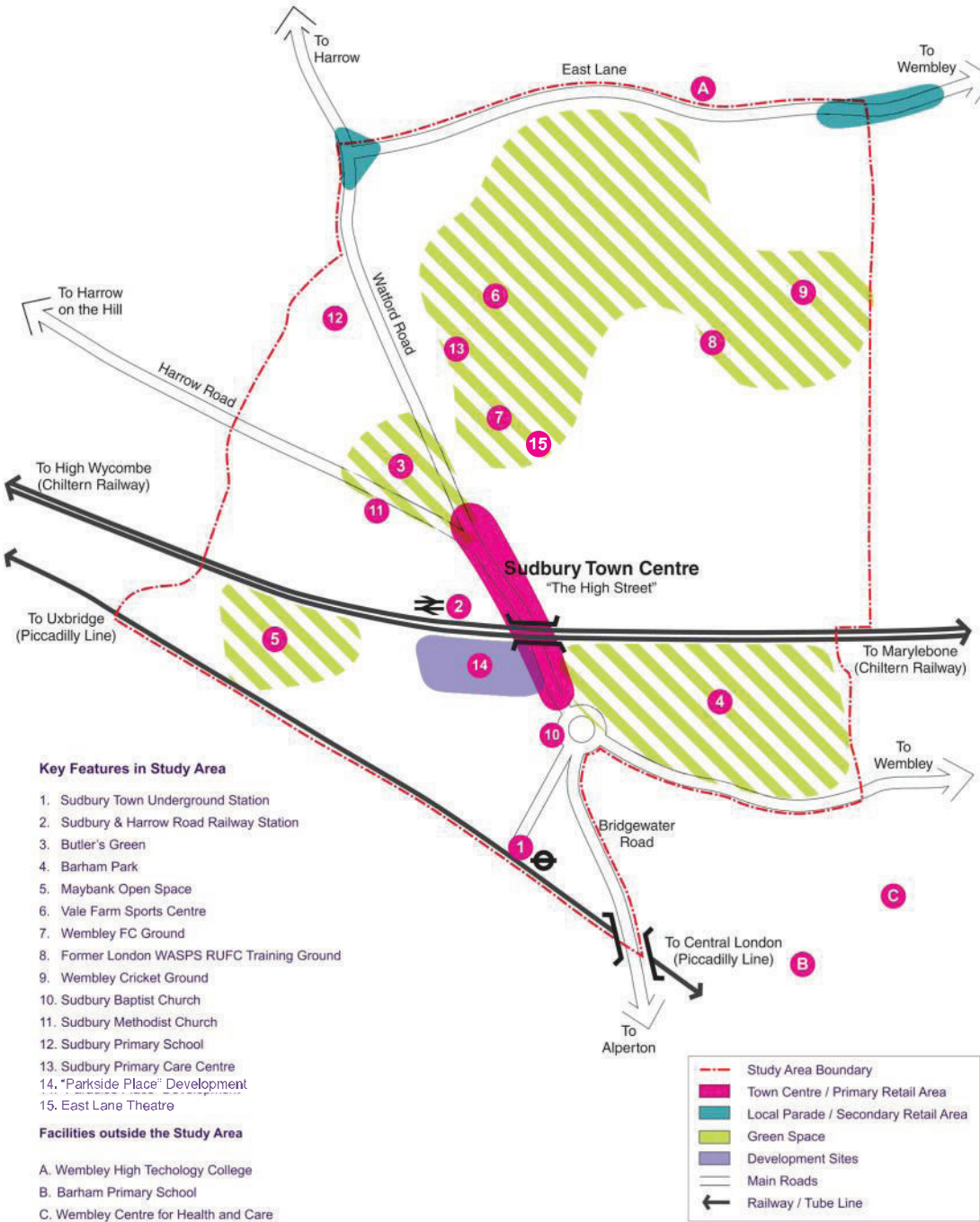
The town centre

The town centre is on the Harrow Road and includes a mix of high street activities, such as shops and cafes, as well as betting shops, hot-food takeaways and several car showrooms. It is bookended by the green spaces of Butlers Green to the north and Barham Park to the south.

Most of the shops and retail premises along the High Street are in the order of two to three storeys high. Some are converted residential properties, others are purpose built shop units with flats above. There are few vacant properties along the High Street, and few high street chain stores.

Harrow Road is the main north south route through the study area. Watford Road and Harrow Roads come together at the Butlers Green end of the High Street. At the Barham Park end, Harrow and Bridgewater Roads come together. The High Street thus acts as a funnel, with all movement routes and activities coming together at this point.

Figure 3: Uses within the neighbourhood plan area





Uses and connections

In addition to the mix of activities along the High Street, the study area benefits from the presence of a mix of social and community facilities, including schools, and the Baptist and Methodists churches. It also benefits from extensive areas of green space. In addition to Butler's Green and Barham Park, the study area also includes the Vale Farm sports and leisure area, as well as the Maybank open space (figure 3).

The area is well served by public transport. Sudbury Town underground station provides regular services into central London, and numerous bus routes operate through the town centre. Sudbury & Harrow Road railway station is also found on the High Street. This provides train services into Marylebone, although these are infrequent. The railway line crosses Harrow Road and acts to cut the High Street in half.

The highest concentration of shops and activities are to the north of the railway line, although there is a small parade of shops fronting the Harrow Road roundabout to the south of the railway line. The recent redevelopment of the Classic Cars dealership, including flats and a Tesco food store, is helping to link the two sides of the High Street together. This development ('Parkside Place') is the first phase in the planned regeneration of the Barham Park Estate. The current street and pavement improvements being carried out along the High Street will also help unify the area.

Much of the remainder of the study area is residential in nature, although there are some local shopping parades at the junctions of East Lane and Watford Road, and East Lane and Sudbury Avenue.

Heritage

There are a number of heritage assets within the plan boundary, including the underground station, parts of Barham Old Court and Butler's Green. There are also some heritage assets outside the plan area but whose setting may be affected by works within the plan area, such as the Sudbury Cottages Conservation Area.

Sudbury Town Underground station: an architectural gem on our doorstep:

"The first of Charles Holden's tube stations for Frank Pick was Sudbury Town, on the Piccadilly line, opened in 1931. There had been nothing like this distinctly modern yet well-crafted building in Britain before. With typical modesty, Holden, a retiring, teetotal, vegetarian Quaker draper's son from Bolton, Lancashire, chose to describe his first modern masterpiece as "a brick box with a concrete lid". Possibly, just possibly, Holden meant something more.

I can't help thinking that this truly great and still under-rated English architect was thinking of Inigo Jones (1573-1652), who had instigated a revolution in British architecture in the reign of James I when he designed the country's first truly classical buildings. When his client Francis Russell, Earl of Bedford, asked Jones to add a chapel "as cheap as a barn" to his smart residential development built around the new Covent Garden piazza, the architect replied "then you shall have the handsomest barn in England". **Sudbury Town station is surely transport design's equivalent of St Paul's, Covent Garden."**

Jonathan Glancey, Guardian architectural correspondent

(The station was awarded Grade II-listed status on 19 February 1971 and upgraded to Grade II*-listed status on 20 July 2011.)

The NPPF, Council's saved UDP policies BE24 Locally listed Buildings, BE25-28 Conservation Area Development Issues and BE31 Archaeological Sites afford protection to heritage assets, as does emerging Development Management Policy 13 on Heritage. Any applications impacting on heritage assets will be considered against these policies in addition to the policies in the Neighbourhood Plan.

Figure 4: Selected images: Sudbury Town today
How can we improve the quiality and appearance of the town centre, the public realm, shopfronts, mix and type of uses?



3. SUDBURY TOWN TODAY (THE ISSUES)

Consultation

Over the course of the past two years we have run a series of consultation exercises. These have included:

- A walk around of the town centre (called a Placecheck) to find out what people like and don't like about Sudbury Town, and what should happen in the area.
- A briefing and Q&A with residents, at which people volunteered to act as 'community champions' to help raise awareness of the plan and contribute their time and skills.
- A presentation to and drop-in surgery for residents and businesses.
- A workshop event to explore opportunities for change and improvement in the town centre.
- A mail-shot to all residents, businesses and organisations in the study area (more than 3,000 questionnaires and briefing notes were sent out).
- Printing and placement of banners in Sudbury Town to raise awareness of consultation events.
- A media campaign to raise awareness, including an article in the Harrow Times.
- Creation of an active twitter feed to seek peoples' views, and regular updates, including questionnaires, on the STRA and Brent Council websites.
- Discussion with people at events such as the Big Lunch in Barham Park and at the Diamond Jubilee parade through Sudbury Town.

- Preparation and consultation on an Options Report, including a series of exhibitions around Sudbury Town and representatives speaking to people in the local area. Approximately 300 questionnaires were completed during this consultation.
- Preparation and consultation on a Regulation 14 Consultation Draft Neighbourhood Plan, including an exhibition in Sudbury Town. 103 questionnaires were completed during this consultation.

Responses to the Consultation Report demonstrated that the vast majority of people agree with the proposals that were presented. This draft final neighbourhood plan now includes minor amendments following comments received from the previous consultation.

Comments have been made at various consultation events and we would encourage people to continue contacting us with your thoughts and ideas. You can contact the STRA direct, become a member or volunteer to help. Details can be found on the STRA website. We look forward to hearing from you.

>> STRA website: <http://www.stra.org.uk/>

>> STRA Facebook page: www.facebook.com/SudburyTown

>> STRA Twitter feed: [@sudburyplanning](http://www.twitter.com/SudburyPlanning) hashtag [#sudtwnNP](https://twitter.com/hashtag/sudtwnNP)

What you told us

Many people have been involved in production of the plan to date, contributing ideas and participating in consultation events. We have spoken with residents, businesses, our local councillors, voluntary organisations, the guides, cadetes and council officers.

Feedback received through the consultation exercises pointed to a series of issues and concerns for consideration in the neighbourhood plan. These are summarised below:

- A poor variety of shops in the town centre and, in particular, there are too many betting shops and hot-food take-aways.
- There is a lot of street clutter in the town centre, comprising a mix of advertising boarding related to shops and other businesses, as well as road signage. The number of satellite dishes on building frontages contributes to this problem. Closely related to this is the issue of litter, overflowing bins and general dumping of rubbish. These all detract from the look and 'feel' of the town centre.
- Although recent work has been undertaken to improve the quality of the pedestrian environment, it was commented that it was still poor in many places and this gives an impression of neglect.
- The poor quality and appearance of the environment beneath the railway bridge on Harrow Road, lighting, graffiti and presence of pigeons.
- Poor quality and dangerous pedestrian crossings, particularly across Harrow Road and District Road, linking with Barham Park.
- A lack of cycling parking facilities and good cycle routes.
- Infrequent rail services from Sudbury and Harrow Road station.

- Car parking is too expensive, particular for short-term visitors. However, it was also noted that commuters are parking at Barham Park and this should be restricted.
- Some people expressed concern about the height of the new residential development to the south of Sudbury & Harrow Road station.
- Concern about the disused toilet block in Butlers Green.
- There is a wide-spread concern about paan spitting⁶, its appearance and generally negative impact on the appearance of the town centre.
- Some people mentioned safety and, in particular, noted issues associated with groups of men loitering in the area, drinking and harassing women.
- Neglected front gardens and little greenery in the actual town centre. But also a need to protect and enhance Butlers Green and Barham Park.
- The lease of the former Wasps RUFC training ground is not being fulfilled and should be enforced so it can be used by all.
- Land to the rear of properties on Chilcott Close is being used as a location for fly tipping and vandalism.

The potential for the neighbourhood plan to identify sites for change and development was also discussed during consultation events. We think the neighbourhood plan is an opportunity, not a threat. Although no sites are formally allocated in this document, the Plan promotes the redevelopment of inappropriate town centre uses, such as car showrooms, to provide development that enhances the High Street, such as new shops, community facilities and new homes.

⁶ Paan is a mixture of tobacco, nuts and spices wrapped in a leaf. When chewed and spat on to the street, it dries and leaves a dark red, blood-like stain that is both difficult and costly to remove.

4. SUDBURY TOWN TOMORROW (THE POLICIES)

Vision and objectives for Sudbury Town

Feedback received through the consultation exercises has led to the following vision statement:

“A greener, cleaner, safer Sudbury Town, with a High Street at the heart of the community that we can all be proud of”

Following from this are a series of objectives. These break the vision into topic areas and will allow for policies and projects to be identified. They are:

>> Objective 1:

A vibrant place with a mix of shops and services

>> Objective 2:

A more attractive place with an improved public realm, and good quality green spaces

>> Objective 3:

A place that is easier to get around, to and from

>> Objective 4:

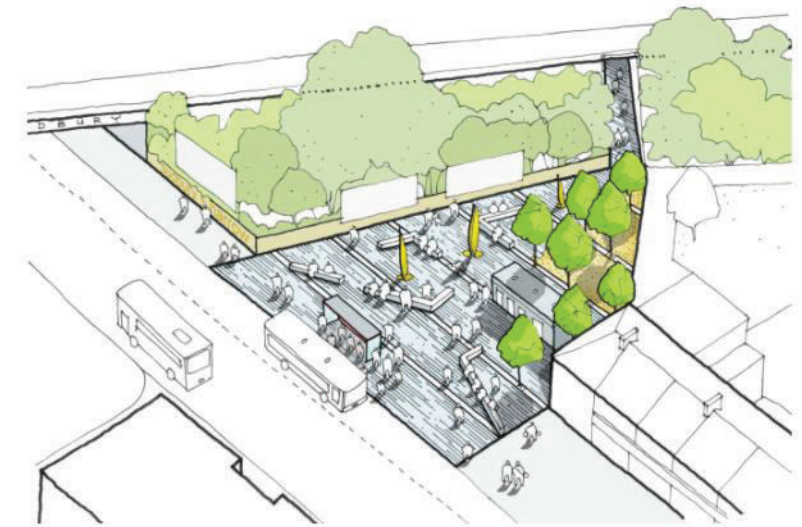
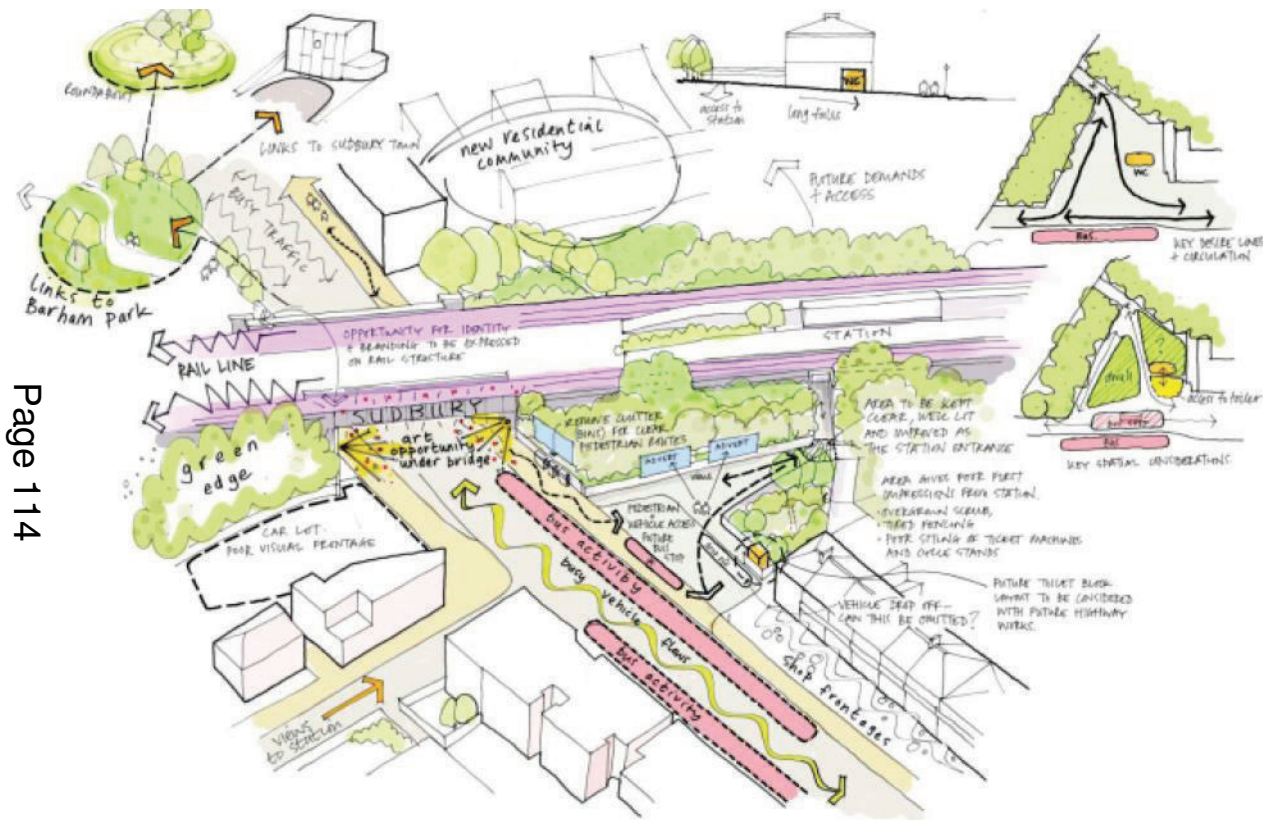
A place where development and change enhances the local area and reflects the needs of the community

Policies and projects

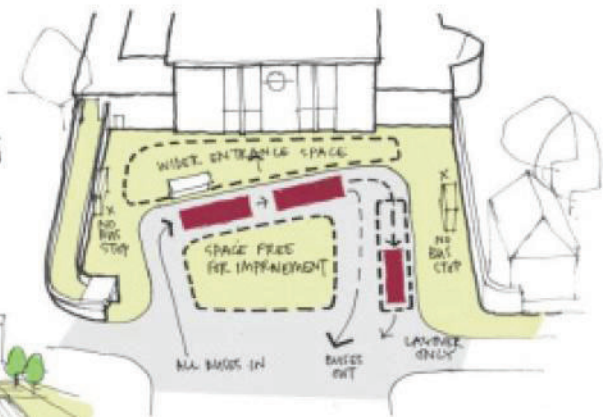
Flowing from the objectives we have identified policies and projects for inclusion in the neighbourhood plan. They are presented in the following section. Where policies are not directly land-use planning related we have included a set of aspirations that we will continue to work towards. These include, for example, lobbying Chiltern Railways for a better and more frequent train service from the railway station.

“...become a more connected, cohesive and locally active community...”

Figure 5: Potential areas for street and space improvement, as presented by WestTrans



SPACE ALLOWS
BUSES TO DROP OFF
IN FRONT OF STATION
THEN MOVE TO SIDE
FOR LOUNGE & EXIT
SPACE IN FRONT OF
STATION EXTENDED
FEELS AS BUSES MOVING
THROUGH A PEDESTRIAN
SPACE RATHER THAN
OPPOSITE + CURRENT
SITUATION.



Above: issues and options plan for the railway station and High Street gateway
Above right: concept sketch for enhanced railway station square
Below right: concept sketch for enhanced public realm at underground station

Objective set 1: Shops and services

“A vibrant place with a mix of shops and services”

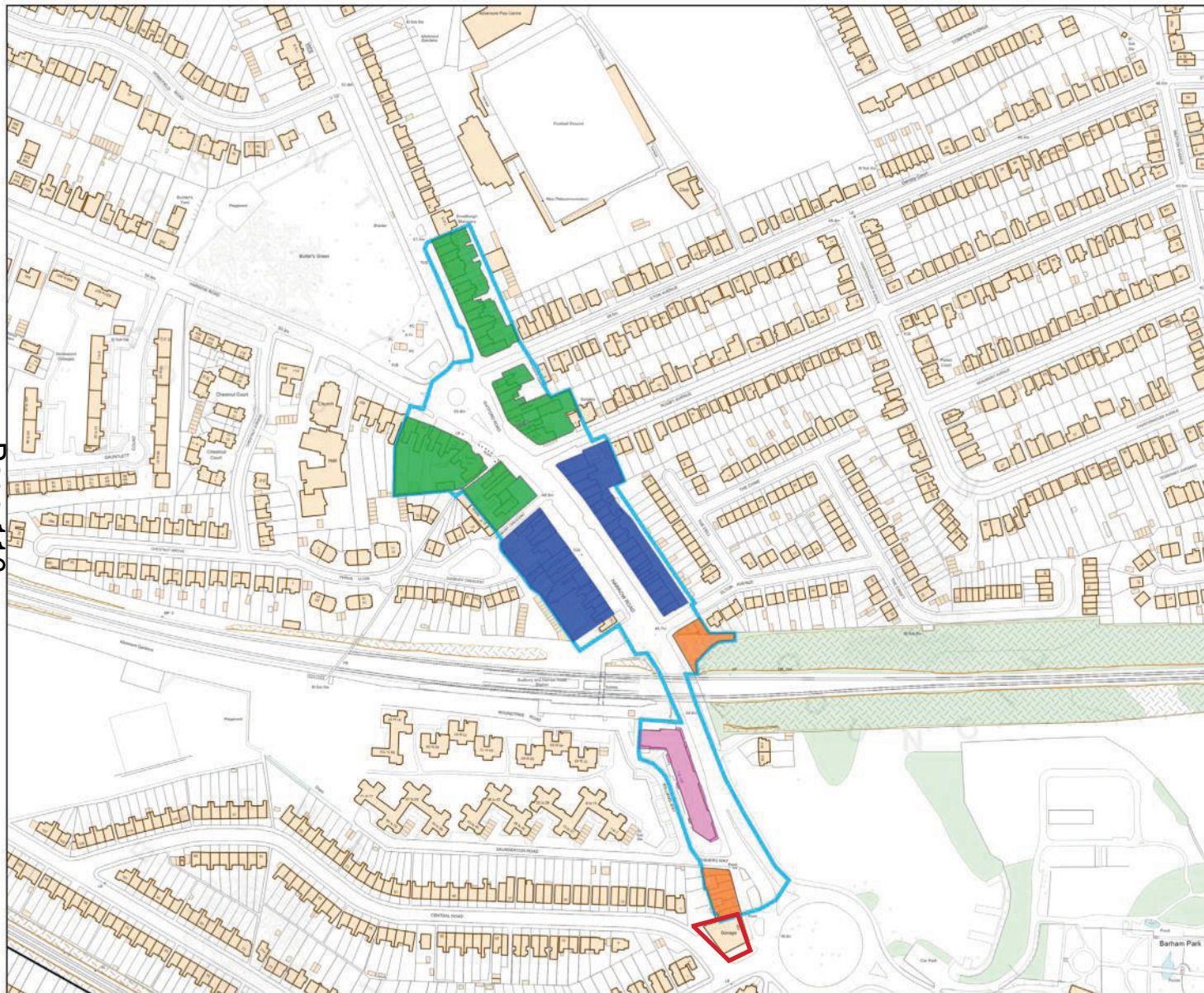
At the heart of Sudbury Town is the High Street, which provides a variety of retail and other services to meet local needs. The Neighbourhood Plan uses the term “High Street” to define the area identified in figure 6. This area is greater than the primary and secondary shopping frontage identified in the Brent Adopted Proposals Map (2011) as it represents the full extent of largely continuous active ground floor uses in this area, which extend further south than the existing allocation. We note that the Council is currently consulting on extending the town centre boundary for Sudbury town to include much of the active frontage to the south of the railway bridge. We welcome this, however would recommend this is extended further still in order to include the garage unit on the junction of Harrow Road and District Road, which acts as a natural conclusion to the High Street.

The High Street (as defined in this neighbourhood plan) currently comprises approximately 77 ground floor units excluding residential properties. It includes a diverse range of retail and other services with relatively low vacancy rates. The composition of the High Street is shown in Table 1. The mix is illustrated in figure 7.

Table 1: Mix of uses in Sudbury town centre

Activity	No. units	% of all units	Length of frontage (m)	% of frontage
Retail (Use Class A1)	24	31%	137.9	28%
Professional services (including solicitors, accountants, insurance brokers, hairdressers and estate agents, but excluding betting shops) (Use Class A2):	16	21%	99.8	20%
Betting shops (Use Class A2)	3	4%	24.2	5%
Hot food takeaway (Use Class A5)	11	14%	48.9	10%
Car sales, car hire and car repair (Use Class Sui Generis):	7	9%	93.5	19%
Restaurants, cafes and pubs (Use Classes A3 and A4)	7	9%	44.6	9%
Various other (Use Class Sui Generis and A4)	3	4%	8.5	2%
Vacant	6	8%	34.4	7%
Total	77	100%	491.8	100%

Figure 6: Brent Council Town centre boundary / Sudbury Town neighbourhood plan High Street boundary



Extent of existing and proposed Town Centre boundary established by Brent Council:

- Primary Shopping Frontage
 - Proposed
 - Existing
- Secondary Shopping Frontage
 - Proposed
 - Existing
- Proposed Town Centre Boundary

The High Street area used for the purposes of the neighbourhood plan is based upon the proposed Town Centre boundary outlined in blue plus the coloured extension to this labelled below:

- Extended High Street area



Brent Council's Town Centre Background Report⁷ recommends that no more than 40% of the primary frontage in town centres should be occupied by non-retail services. In Sudbury Town non-retail uses account for 69% of all activities on the High Street and 72% of the total frontage. It is considered that in Sudbury Town the non-retail uses, such as professional services, add to the diversity of and provide local employment opportunities as well as acting as attractions to the High Street.

However, concern was expressed during consultation with regard to the presence of betting shops and excessive number of hot-food takeaway outlets along the High Street, some of which are clustered together (see spread: figure 7). Consultation responses pointed towards support for any potential measures that will help control further increases of betting shops and hot-food takeaways in the future. The High Street also has a relatively high proportion of professional services in Use Class A2 (21% of total units and 20% of frontage, excluding betting shops) which, under current legislation set out in the Town and Country Planning (General Permitted Development) Order 1995, could change to a betting shop without the need for planning permission. However, recently the Department for Culture, Media and Sport has published a report on Gambling Protections and Controls (April 2014), which includes recommendations for all new betting shops to require a planning application to give local authorities more control over the number of betting shops on high streets. The Government will launch a formal consultation on the details of this proposal in summer 2014.

It was suggested through consultation on the neighbourhood plan that a diverse range of shops and facilities should be encouraged to locate along the High Street and that the clustering of particular uses, such as betting shops and hot-food takeaways, should be avoided where possible. This is support by London-wide and emerging local planning policy and the need to control such uses is also being

recommended at a national level, as considered further in the following paragraphs.

The National Planning Policy Framework encourages the use of planning to support “strong, vibrant and healthy communities” and improve the vitality and competitiveness of town centres. There is growing concern in recent years over the impact of the proliferation of hot-food takeaways and betting shops on high streets nationwide. The London Assembly Economy Committee's report on London's High Streets in 2012 noted there is an increasing amount of particular services on London's high streets, including betting offices and hot-food takeaways, which is causing concerns over a lack of diversity on high streets. In particular the need to restrict the amount of betting shops was highlighted in the Portas Review (2011).

The proposed further alterations to the London Plan (January 2014) note in policy 4.8 that clusters of activity should be managed and in the supporting text to this notes that the over-concentration of betting shops and hot food takeaways can give rise to concern.

⁷ Unknown date (prepared by Brent Council as evidence for the Draft Development Management Policies Document, February 2014)

Figure 7: Uses and activities along Sudbury Town High Street

The High Street: West side

South



The High Street: East side

North





Key	
	Hot food take-away 11 in total 14% of High Street units
	Betting shop 3 in total 4% of High Street units
	Other A2 use classes 16 in total 21% of High Street units
	Car sales, hire and repair 7 in total 9% of High Street units
	Vacant 6 in total 8% of High Street units

Brent has recently published a *Draft Hot Food Takeaways in Brent Policy Evidence Base*⁸ note to support the emerging town centre policy in the Brent Development Management Policies document. This demonstrates that of the sixteen identified town centres in Brent, Sudbury has the second highest proportion of takeaway units. Furthermore the number of takeaways far exceeds the number of general food stores, butchers, grocers, fishmongers and bakers, which means that “*residents have greater access to takeaways than fresh food*” (p.6). In light of rising health concerns in Brent associated with poor diet, the ease of access to takeaways is a significant concern in Sudbury.

With regard to betting shops, a recent report published by Brent, *A Fair Deal: Betting Shops, Adult Gaming Centres and Pawnbrokers in Brent*⁹, demonstrates the proportion of frontage occupied by betting shops in Sudbury is the second highest in the borough. Not only does this high concentration impact the diversity and potential vitality of the town centre, but betting shops are also associated with negative impacts on wellbeing. Problem gambling is an identified health disorder, and disproportionately affects vulnerable groups in society, such as the unemployed and people in bad or very bad health¹⁰. In addition, betting shops are often associated with anti-social behaviour which can effect perceptions of safety and fear of crime in areas¹¹. It is important to the community to mitigate the potential negative impacts of high concentrations of betting offices.

These reports are informing the production of Brent Council's emerging Development Management Policies Document (DMPD). As part of this policies are being prepared that seek to restrict the proportion of betting shops and hot food takeaways in town and neighbourhood centres. Draft Policy DMP 2 proposes limiting the

proportion of frontage within the town centre consisting of betting shops to 4% and of takeaways to 6%.

In Sudbury High Street, the proposed maximum proportion of frontage occupied by betting shops (5%) has already been reached (see Table 1). In addition, the proportion of High Street frontage occupied by hot-food takeaways (10%) far exceeds the recommended threshold (6%). The DMPD also includes policies that seek to restrict the clustering of betting shops and hot-food takeaways by specifying that these use types should not be located next to each other and that a certain number of alternative uses should be located between each betting shop or hot food takeaway. These policies will be consulted on from May 2014 but the final document is not expected to be adopted until November 2015.

We will watch how the emerging planning policies and proposals unfold and thus how they can help influence change in Sudbury Town. In the meantime, our policy seeks to promote a diverse range of uses along the High Street and a better balance between retail and non-retail activities, avoiding over concentration and or clustering of betting shops and hot food takeaways. We also endorse the thresholds identified in the emerging DMPD is appropriate for Sudbury as it would restrict the provision of anymore of these types of uses in along the High Street.

Concern was also expressed during consultation about the closure of the library and lack of community facilities within the town centre. It was suggested that beyond day-to-day necessities, there were few reasons to visit and spend time in the town centre and so a greater range of shops should be provided along with new cafes. It was further suggested that other non-traditional high street activities that encourage people to visit the town centre at all times of the day and which have spin-off benefits for other businesses could be promoted. This might include for example a new library or educational facility.

⁸ Brent Council (unknown date), *Draft Hot Food Takeaways in Brent Policy Evidence Base* (prepared as evidence for the Draft Development Management Policies Document, February 2014)

⁹ Brent Council (unknown date), *A Fair Deal: Betting Shops, Adult Gaming Centres and Pawnbrokers in Brent* (prepared as evidence for the Draft Development Management Policies Document, February 2014)

¹⁰ *ibid.*

¹¹ See for example commentary in the Wembley Area Action Plan prepared by Brent Council (July 2013)



In line with the NPPF and in response to the community's desire to create a more diverse High Street it is important to ensure future development on the High Street increases the variety of the offer and meets local needs. In particular, we will encourage more retail uses, cafes, restaurants and community uses

POLICY STNP 1

Proposals for new development and changes of use within the town centre should provide active ground floor uses that contribute to the diversity of the High Street and enhance the vitality and viability of the area. On upper floors, uses that complement the function of High Street will be supported, including residential use (C3 use).

Local retail (A1 use), cafes (A3 use), drinking establishments (A4 use) and community facilities (D1 or D2 uses) will be permitted along the High Street. Proposals that result in the loss of active frontage on the High Street will be resisted.

Proposals for new hot food takeaways (A5 use) and betting shops (currently A2 use¹²) will be assessed in terms of their impact on the diversity of the High Street and local amenity.

The proportion of units occupied by hot-food takeaways (A5 use) along the defined High Street area should not exceed 6%. The total proportion of High Street units occupied by hot-food takeaways (A5 use) currently exceeds this threshold. Proposals for new hot-food takeaways will not be permitted whilst this threshold is exceeded. Should the number of hot-food takeaways and associated High Street frontage fall below the threshold in the future then proposals for new hot-food takeaways will be considered on their merits in accordance with policies established in the neighbourhood plan, wider national and local policies.

The proportion of development frontage occupied by betting shops

(currently A2 use) along the defined High Street area should not exceed 4% of the total frontage. The total High Street frontage currently occupied by betting shops is 5%. Proposals for new betting shops will not be permitted. Should the number of betting shops and the associated High Street frontage fall below the threshold in the future then proposals for new betting shops will be considered on their merits in accordance with policies established in the neighbourhood plan, wider national and local policies.

Proposals that result in fewer than two non-A5 units between takeaways will not be permitted. Proposals that result in fewer than four units in non-betting shop use between betting shops will not be permitted.

¹² Should the use class for betting shops change this should be read as the new Use Class as appropriate.

Objective set 2: Public realm

“A more attractive place with an improved public realm, and good quality green spaces”

The public realm is defined as all the spaces between buildings to which the public has access. The Brent Placemaking Guide¹³ states that:

‘a well designed and high quality public realm is essential to creating good places and strong communities....’

During early consultation events many people expressed concern about the quality of the public realm, the state of the pavements (including potholes), the lack of greenery along the High Street, lack of places to sit, and the unwelcoming nature of the pedestrian environment under the railway bridge.

In parallel to our work on the neighbourhood plan, the Council, in partnership with Transport for London, designed a public realm improvement scheme¹⁴. We supported that.

The improvement works are now complete. We believe the scheme has made a vast improvement to the quality of the High Street. It is a nicer place to walk, to visit and spend time in. It is now easier to cross the road. New street trees have been introduced. New toilets have been installed next to Sudbury and Harrow Road station. The High Street feels and looks both cleaner and fresher. It is somewhere that we enjoy spending time in.

¹³ Brent Council, 2011, The Brent Placemaking Guide, Achieving excellence in the design of the public realm

¹⁴ This scheme was prepared in accordance with the London Mayor's Transportation Strategy and Brent Council's Local Implementation Plan (LIP) for transport. It also accords with policy 6.1 of the London Plan. Funding for the scheme has been made in full by TfL

The aim of the improvement scheme was:

*‘to provide a new road layout for Sudbury Town centre which will benefit all road users. The scheme specifically targets reducing pedestrian and vehicle accidents, improving bus facilities and movements, improving parking and loading, reducing congestion, and improving the streetscene’.*¹⁵

We think it has achieved many of these things and that it represents an excellent start for Sudbury Town. However, we think it can be extended further.

Proposed additional public realm improvements

The scheme that has been implemented addresses many of the issues and concerns expressed in the earlier consultation exercises. It has reduced street clutter along the High Street, increased pedestrian space and safety at crossing points, introduced trees and greenery, linking the High Street with Butlers Green and Barham Park, and resolved some of the conflicts between pedestrians, busses and other traffic.

Overall, it has contributed to an enhanced and improved environment for all – which has emerged as one of the key objectives for this neighbourhood plan. This is an excellent start for Sudbury Town and should be further expanded.

¹⁵ See Brent Council public consultation document, March 2011, Ref.: TP880 – JP (<http://www.bmgresearch.co.uk/brent/UploadedFiles/Signed%20-%20TP880%20Delegated%20Report.pdf>)



The public realm improvements that are prioritised are as follows:

- Improving the quality of the pedestrian environment and experience under the railway bridge, including the installation of feature lighting and or public art (see examples in figure 8).
- Further enhance the quality of the space outside Sudbury and Harrow railway station, creating a safer and more pleasant environment. This could be a new town square, with seating, cycle parking and an improved station entrance.
- Relocate the no. 18 bus stand further north to both reduce congestion in the High Street and the visual impact of standing buses. The relocation of the bus stand would be dependent on further discussion with Transport for London.
- Improve the pedestrian environment around and access to the Sudbury Town underground station, reconfiguring the bus stop and waiting areas outside the front of the station, and enhancing the pedestrian entrance to the rear of the station.
- Expand the urban realm scheme to include improvements to pedestrian crossing facilities at the Harrow Road and Bridgewater Road roundabout, making them more direct and easier for pedestrians to cross to Barham Park. Consideration could be given to a reconfigured road junction here, potentially replacing the roundabout.
- Expand the urban realm scheme to include the former toilet block at the apex of Butlers Green, integrating this space with the High Street.
- Landscaping of the mini-roundabout at the apex of Butlers Green, improving the welcome to the town centre.
- Cleaning up the rubbish behind the fences next to the railway bridge, and removal of advertising hoardings which contribute to visual clutter.
- Exploring whether the sale of paan can be regulated and whether behavioural attitudes can be changed to reduce the amount and impact of paan spitting and stains on the quality of our streets and spaces.

Figure 8: Example images showing how the bridge environment could be improved with the use of lighting and artwork, making a better 'gateway' into the High Street



**Top: Mural, Kilburn
Bottom: Lighting, Southwark Street**



Above: Artwork, Southwark Street



Above: Lighting and place naming, Acton



WestTrans¹⁶ has explored a number of the priority public realm schemes, including improved pedestrian space outside the main entrance of Sudbury Town underground station, creation of a pocket park to improve the pedestrian entrance to the rear of the station, improving areas of paving and crossing facilities over the Bridgewater Road roundabout, improving the experience under the railway bridge, and creating a new landscaped park outside the Sudbury and Harrow Road railway station. Longer term, it is also suggested that a secondary access to the Sudbury and Harrow road station, through the redevelopment of the Barham Park estate, might be created. Together, these can help transform the quality of Sudbury Town Centre. In order to progress the priority public realm schemes, further liaison will be required with the Council, Transport for London, Network Rail and Chiltern Railways.

ASPIRATION 1

We will promote further public realm improvements in Sudbury Town. The priority areas for improvements are listed in the “Proposed additional public realm improvements” section above. Funding will be sought from relevant sources, including CIL funds from new development in the Neighbourhood Plan Area.

POLICY STNP 2

Any further public realm works in Sudbury Town should be of the same quality of and follow the style of work already undertaken along the High Street, providing a consistent and unified appearance across the town centre. Public realm schemes should also be prepared in accordance with the guidance and principles set out in the Brent Placemaking guide, or any subsequent good practice guidance.

¹⁶ WestTrans is a partnership of the six West London boroughs of Ealing, Brent, Hammersmith & Fulham, Harrow, Hillingdon and Hounslow. It works with Transport for London to identify, develop and implement transport projects to the benefit of the subregion. See example images in Figure 5.

Shopfronts

The quality of the shop fronts along the High Street has an influence on the appearance and attractiveness of the town centre. During consultation the visual appearance of buildings in the town centre was raised: many people thought that the upkeep and maintenance of the buildings could be improved, and that a consistent approach to signage and shopfronts would make an improvement to the experience of the town centre.

The recent transformation of Leyton High Street (see figure 9) demonstrates what can be achieved¹⁷. New shop fronts, signage, materials and facade treatments have enhanced the quality and appearance of the town centre. This was funded through the Government’s ‘Working Neighbourhood’s fund’¹⁸. It provides an example of how the shop fronts in Sudbury Town could be enhanced¹⁹. We will discuss with the Council what grants and funding might be available to help pay for shop front improvements. This might include various Mayoral programmes, such as the Outer London Fund, which has helped contribute to high street improvements elsewhere in London.

It was also suggested during the consultation exercises that landlords of properties fronting the High Street should be required to maintain their properties in line with the aspiration for an improved town centre.

¹⁷ For more information, see, for example: <http://www.guardian.co.uk/sport/2012/jun/22/london-olympic-leyton-council-makeover?newsfeed=true>

¹⁸ See

<http://webarchive.nationalarchives.gov.uk/20120919132719/www.communities.gov.uk/communities/neighbourhoodrenewal/workingneighbourhoodsfund/>

¹⁹ Other examples are presented by Design for London in their publication ‘The London High Street Possibilities Primer’, September 2011

Figure 9: Example images of shopfront improvements along Leyton High Street



Brent Council's Shopfront and Shop Sign supplementary planning guidance²⁰ is a material consideration for applications and should be referred to by individuals and businesses proposing the installation of new shopfronts and signs in Sudbury Town. It includes guidance on architectural features, fascia's, projecting signage, awnings, security shutters, cash dispensers, highway safety and illumination. The guidance establishes what would be considered acceptable or not within individual planning applications.

We will lobby for a shopfront improvement scheme in Sudbury Town as part of or in parallel to an expanded public realm scheme, ensuring consistency and coherence between the two.

We would like to develop a standardised shopfront, sign and pavement signage style to create a Sudbury Town brand that is unique and easily recognisable. We would also like to run a completion with local school children to develop an artwork scheme for shutters and vacant uses to make these aspects more attractive²¹.

²⁰ Brent Council, 2003, SPG7: Shopfronts & Shop Signs

²¹ Similar schemes have been promoted in Barking and Dagenham in the *Paint the Town Shopfront Improvement Project*, see <http://paint-the-town-barking.tumblr.com/> and <http://www.lbld.gov.uk/News/PressReleases/Pages/PaintthetownBarking.aspx>

ASPIRATION 2

We will promote a shopfront improvement scheme and associated guide for Sudbury Town. Funding will be sought from appropriate sources, including CIL funds from development within Sudbury Town.

The Sudbury shopfront guide should further develop and update the existing Brent Council Shopfront and Shop Sign Supplementary Planning Guidance as appropriate for Sudbury Town. This should seek to create a unique Sudbury style that reflects and strengthens the character and qualities of the town centre. Should this be implemented, any proposals for new shopfronts, shop signs and pavement signs will be expected to replicate the established “Sudbury Style”.

POLICY STNP 3

Proposed improvements to existing shopfronts will be welcomed. Proposals for new shop fronts should be designed to be well proportioned and enhance the character of Sudbury Town.

Proposals for new or altered shop fronts should be prepared in accordance with the guidance and principles set out in the Brent Council Shopfront and Shop Sign Supplementary Planning Guidance, or any subsequent good practice guidance to be published at a later date.

The use of shop signage on pavements should be limited to reduce clutter within Sudbury Town. There is a presumption against general advertising on premises along the High Street unless it is directly associated with the business that takes place on the premise. Any new signage on pavements that is associated with the business of individual premises should have due consideration for the character and design of the street furniture in the wider area and should seek to enhance the public realm.

Figure 10: Example images: Shopfront shutters in Barking (top) and Wood Street (bottom)





Green spaces

The Council's Core Strategy recognises the importance of and seeks to protect areas of open space and local value. Through the neighbourhood plan, additional weight can be given to the protection of open space in Sudbury Town. At earlier consultation exercises, the value of Butlers Green and Barham Park were identified. Comments were also made with regard to making better use of these spaces and better integrating the quality and value of these green spaces with the High Street. And new development that takes place in Sudbury Town should seek to enhance the quality of the green spaces and local ecological habitats.

It was also suggested that these areas should be protected as important local green spaces. The opportunity exists to do this through the neighbourhood plan. As national policy states:

*Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances.*²²

²² See paragraph 76, National Planning Policy Framework

Butlers Green

Butlers Green is located at the heart of Sudbury Town and is an important local green space. There is the potential to enhance the value of this space through re-using or redeveloping the redundant toilet block for alternative community uses, enhancing the quality and safety of the space and improving access to the park.

Barham Park

In parallel to the production of this neighbourhood plan, approval has been granted for the Trustees of Barham Park to develop an option appraisal, project management plan and feasibility study for future uses of the Park buildings and options for improving the public space²³.

The two strands of work will be taken forward together, with the neighbourhood plan (and the Council's Core Strategy), presenting the policy framework for the park. Options that are currently being explored by the Trustees include:

- Advertising vacant space within the existing complex of buildings for reuse and investigating whether any adaptations or other work is required to make the existing space more attractive for reuse and leasing out.
- Restore, repair and improve existing landscaping in the Park.
- Create enhanced eco-habitats for wildlife and educational purposes.

²³ See LB Brent, Item 4, Minutes of the Executive, Monday 12 March 2012

The neighbourhood forum would like to see a long term sustainable use of the Park and the buildings within it. The results of the consultation demonstrate that there is strong support for the provision of community uses in the park, such as a library space or an adult education and training centre. The provision of these uses will be dependent on funding, and as a starting point the potential for funding to be provided from S106 contributions or CIL funds will be investigated.

In the meantime, and subject to discussions with the Trustees, temporary library provision might be accommodated. This could potentially take the form of a 'pop-up' library²⁴ or a 'meanwhile use'²⁵.

The Park currently contains a limited amount of sports facilities and play equipment. The consultation demonstrated there is a demand for improving and expanding the range and amount of sports and play facilities, and CIL funds will be sought to provide this.

Any improvements to Barham Park and Butlers Green should be considered alongside an extension of the public realm scheme outlined above. This would help integrate the green space with the High Street but also, importantly, look to enhance pedestrian crossing points across Harrow Road to better improve access to the Park.

ASPIRATION 3

We will seek to enhance public open spaces to make them safer and provide further community uses. Pedestrian crossing points across Harrow Road will be promoted in order to better improve access to parks.

We will also promote an increase in the amount and range of sports facilities and play equipment in Barham Park.

Funding for such projects will be sought from appropriate sources including CIL funds from development in Sudbury Town.

Figure 11: Example image: a summer screen in the park



²⁴ The library is currently being hosted in a pop-up in Wembley High Street. We would like to bring this back to Sudbury Town.

²⁵ A meanwhile use is a temporary use of an empty property, facilitated through special 'meanwhile' leases. They can be used by community groups (and others) for a short-time. Such use can help maintain buildings and make a place feel vibrant and active. More can be found at <http://www.meanwhile.org.uk/> or <http://www.meanwhilespace.com/>. The recent London Plan draft Supplementary Planning Guidance on Town Centres encourages the use of meanwhile uses.

POLICY STNP 4

All existing open spaces within Sudbury town will be protected and retained. The following improvements are prioritised for Butlers Green and Barham Park.

Butlers Green

The reuse, or appropriate redevelopment, of the redundant toilet block on Butlers Green to provide a new community use will be encouraged. The preferred developments for the Butlers Green redundant toilet blocks are as follows:

- Refurbishing and using the existing buildings for alternative uses which complement the function of the open space, such as a cafe in the park (Use Class A3), or a pop-up shop²⁶ (Use Class A1) or a new community facility (Use Classes D1 and D2).
- Reusing the space for temporary activities, possibly including a weekly farmers market or similar and summer events, including the screening of films at an outdoor cinema for example.

Should the redundant toilet block be demolished and redeveloped, any replacement development should be a high quality design that enhances the character of Butlers Green and Sudbury Town. The development should take into consideration the open character of the wider public space and should not exceed the footprint of the existing buildings.

Any improvements to Butlers Green should be considered alongside an extension of the public realm scheme in order to help integrate the green space with the High Street.

Barham Park

Proposals for the re-use of the existing Barham Park buildings to provide a new community facility (D1 or D2 Use) or any other use that would support and complement the function of the park will be supported.

Any proposals for the re-use or redevelopment of park buildings for residential use (Use Class C3) will not be supported.

²⁶ Empty or vacant space or buildings used on a temporary, short-term basis

Vale Farm sports centre

The sports facilities and playing fields at Vale Farm are a wonderful asset for Sudbury Town. Brent Council, in their Core Strategy Site Allocations document (adopted 2011) note that the facilities are reaching the limits of use and are in need of modernisation and improvement. The Site Allocations document goes on to say that improved indoor and outdoor sports and recreation facilities should be provided here, incorporating better cycle links through Vale Farm and improved public transport links.

We think that Vale Farm has the potential to become a regional centre of sports excellence. We fully support the Council's Site Allocation and do not believe a further policy is necessary in this Neighbourhood Plan.

ASPIRATION 4

Proposals that result in the improvement and enhancement of Vale Farm Sports Centre facilities will be supported. This could include bringing un-used spaces into use for sport and recreation uses, extending and improving changing facilities, providing facilities for sports currently not provided for and providing facilities and services that improve accessibility for all members of the community regardless of age and to sport.

Figure 12: World cup winners England train at Wembley FC, Vale Farm, 1968



Former Wasps RUFC Training Ground and Club House

Up until the late 1990s London Wasps Rugby club were based in Sudbury, playing their home games at Vale Farm. The former ground has now been redeveloped for housing, but the club house and former training ground remain, though leased to new owners.

The Clubhouse and car park were sold freehold to the present owner by the Wasps Rugby Club. The adjacent fenced-off sports pitch is owned by the Council but has been leased to the owners of the former Clubhouse. The terms of the lease and the legal agreement that was attached to the planning permission for the redevelopment of the former Wasps ground requires that the pitch and Clubhouse be made available at certain times for public use²⁷. Unfortunately the pitch has fallen into disuse and has been allowed to become overgrown and the Clubhouse is not open to the public.

During consultation on the neighbourhood plan, comments were made that the lease should be enforced. The Council are currently exploring ways of ensuring that the pitch and Clubhouse is brought back into public use. Ideally this would be by working in partnership with the current owners of the Clubhouse and an appropriate community sports team. However, if this does not prove possible, other legal remedies may need to be considered.

ASPIRATION 5

We will work with the Council in order to enforce the requirements of the deed for the former Wasps Training Ground and Club House specifically relating to:

- the public use of the Eastern Land between 4pm and 6pm on weekdays and Saturday mornings during school term time; and
- making the Clubhouse available for use by local community groups for meetings on two weekday nights for between two to three hours on each occasion.

Land to the rear of the Crowngate Estate

To the rear of the Crowngate Estate (Compton Avenue, Chilcott and Hastings Close) a strip of land, currently leased to the owner of the former Wasps RUFC Clubhouse, is poorly maintained and subject to fly-tipping.

This situation could potentially be improved by revising the lease and allowing home owners whose gardens back onto this strip of land to extend their gardens and take ownership and responsibility for it (should they be willing).

ASPIRATION 6

We will work with the residents of the Crowngate Estate and the Council to provide an appropriate approach to the management and ownership of the aforementioned strip of land currently leased to the former Wasps RUFC Clubhouse.

²⁷ Set out in Schedule Two Paragraph 7(i) - (iv) of the lease dated 21/05/1999.



Objective set 3: Access and movement

“A place that is easier to get around, to and from”

A more vibrant Sudbury Town, with a good mix of shops, would help reduce the number of journeys residents make to other shopping areas by car and public transport. This is good for the environment and for local businesses.

The consultation raised a series of access related issues. We present draft policies for these below. In all instances, we would like to see better access for all.

Walking

The public realm scheme currently being implemented has made a significant improvement to the quality of the pedestrian environment in the town centre. However, as outlined in the policies relating to public realm (above), we think further improvements could be made to improve walking conditions even further. These include:

- Extending the public realm improvements all the way down to the Bridgewater roundabout.
- Improving conditions under the railway bridge.
- Improving crossing facilities, particularly across to Barham Park.
- Improving the quality of space outside the railway and tube station entrances.

We think that further consideration should also be given to the junctions that bookend the High Street (Harrow Road and Watford Road roundabout to the north, Harrow Road and Bridgewater Road roundabout to the south). These are the ‘gateways’ into the town centre and as such would benefit from an improved ‘welcome’ and arrival into the town centre. Coupled with improved pedestrian

crossing facilities to Barham Park, we think that the Bridgewater Road roundabout could be re-modelled. It is a large junction: scope exists to give some of this space back to the park for the enjoyment of all.

Concern has also been expressed with regard to safety in the area. The pedestrian link between Harrow Road, Perkin Close and across the railway line to Maybank Open Space is considered to be particularly unsafe, enclosed as it is between the backs of properties. A short term improvement could be to remove the wall between Sudbury Crescent and Perkin Close, opening up views and increasing the perception of safety.

ASPIRATION 7

We will promote the improvement of the pedestrian environment in Sudbury Town. These improvements will include:

- Improving conditions under the railway bridge by enhancing the quality of the environment to create a welcoming arrival point that is attractive and safe. This could include new lighting and art work under the railway bridge.
- Improving crossing facilities, particularly across the Harrow Road to Butlers Green and Barham Park.
- Improving the quality of space outside the railway and tube station entrances by creating an attractive and high quality environment that people enjoy being in, is safe and acts as a welcoming arrival point.

Funding will be sought from appropriate sources, including CIL funds from development in Sudbury Town.

Cycling

Consultation responses showed a desire to improve cycling conditions and facilities in and around the neighbourhood plan area. This aligns with current initiatives across London: the Mayor has recently launched his cycle vision for London and announced funding for new schemes in the outer London boroughs.

ASPIRATION 8

We will promote the improvement of cycle facilities in Sudbury Town. These improvements will include:

- New, secure cycle parking facilities along the high street and at the railway and tube stations.
- Safer and more attractive cycle routes, including improved connections across Vale Farm, linking to the wider cycle network and helping to encourage more cycle use.
- Improved cycle routes incorporated into any extension of the public realm scheme, including a potential remodelling of the Bridgewater Road roundabout noted above, which should follow Dutch-style principles of cycle segregation (see figure 13) and be in accordance with the soon to be updated London Cycle Standards, to make cycling a safer and more attractive proposition for all people, of all ages and abilities.

Funding will be sought from appropriate sources, including the Mayor of London's Cycling Fund and CIL funds from development in Sudbury Town.

Figure 13: Example image: 'Dutch-style' roundabout with dedicated cycle provision





Public transport

Comments were made during consultation with regard to the frequency of services operating from Sudbury & Harrow Railway Station.

Although not strictly a planning issue, this is noted in the neighbourhood plan to reflect and support the community's desire to see improved services at the railway station, which the community will seek through continued lobbying of Chiltern Railways.

It was suggested during the consultation events that there should be a community notice-board in the town centre, and that the public space next to the Sudbury & Harrow Railway station might be a suitable location for this. It was suggested that this should be electronic, displaying real time public transport and travel information, as well as being used to display local information and upcoming events.

ASPIRATION 9

We will lobby Chiltern Railways to increase the frequency of services operating from Sudbury & Harrow Railway Station. Funding will be sought to provide a community notice board in the public space next to Sudbury & Harrow Railway Station.

Parking

Comments were made during consultation in regard to parking regimes, short and long term parking and parking costs.

Although it is not within the remit of planning policy to establish the cost of parking and the time that someone may park for, it can establish policies in regard to parking provision. In this regard, the London Plan establishes standards for car parking. Flexibility can be used, particularly in town centres 'where there are identified issues of vitality and viability'²⁸.

These standards relate to individual developments and planning applications and should be considered when applications for development or change of use are made in the area. In light of the existence of higher level policies relating to parking it is not necessary to provide an additional policy in this Neighbourhood Plan.

²⁸ See London Plan, 2011, Policy 6.13

Objective set 4: Development and change

"A place where development and change enhances the local area and reflects the needs of the community"

Through the neighbourhood plan we have the opportunity to be proactive about land use and development changes.

At present, the Council does not identify any sites for development in Sudbury Town. That does not mean to say that planning applications cannot come forward and be approved. Where they do, they will be judged on their merits against existing policies in the Council's Core Strategy.

The Neighbourhood Plan does not allocate any specific sites for development; however it does promote the redevelopment of existing inappropriate town centre uses, such as car showrooms (see Policy STNP6). Future decisions and applications will then be made in accordance with the plan, and thus our wishes for the area.

We also have the scope to use future development in the area to help lever funds to pay for improvements to infrastructure in Sudbury Town.

Developers are obliged to pay a 'Community Infrastructure Levy' (CIL) if and when planning applications are approved. This levy applies to development over 100 square metres.

The levy is determined in accordance with the Council's schedule of charges²⁹. If an application is approved for development in the area, 15% of the levy will be ring fenced for spending on projects in the

neighbourhood plan area. When the neighbourhood plan is brought into force ('made'), that figure will rise to 25%.

Through the neighbourhood plan, we can say what we think the CIL funds should be spent on. We have set out in Policy STNP 5 the priorities for the levy.

Community Infrastructure Levy

The Community Infrastructure Regulations state that:

Any monies received through the levy is meant "to support development" of the area, including funding towards "the provision, improvement, replacement, operation or maintenance of infrastructure" or "anything else that is concerned with addressing the demands that development places on an area".

In the neighbourhood plan we have identified proposals that we will seek CIL funds for. Policy STNP 5 outlines our priorities for CIL funding.

POLICY STNP 5

CIL funds will be targeted at the following schemes, which are listed in order of priority:

1. Contributions to an expanded public realm scheme.
2. Contributions towards new community facilities, such as new library space.
3. Contributions towards road improvements, including new cycle routes and facilities, as well as safer pedestrian crossings and the potential remodelling of the Bridgewater Road roundabout.
4. Contributions towards a shopfront improvement scheme and associated guide.

²⁹ See <http://www.brent.gov.uk/services-for-residents/planning-and-building-control/planning-policy/community-infrastructure-levy/>

Development opportunities

In light of the built up nature of Sudbury Town development opportunities are limited, and no sites within the area have been identified in the Council's Site Allocations document. However, it is acknowledged that there are a number of inappropriate land uses within the town centre, such as the car show rooms, where redevelopment or reuse would be welcomed. In line with Policy STNP 1, any new development within the town centre should comprise an appropriate town centre use at the ground floor, such as retail (A1 use), cafes (A3 use), drinking establishment (A4 use) or community facilities (D1 and D2 use) and residential (C3 use) at the upper levels.

As noted in previous sections, we also encourage:

- Strengthening Vale Farm as a regional centre for sports excellence.
- Reusing, refurbishing or redeveloping the vacant toilet blocks in Butlers Green.
- Reuse of buildings in Barham Park, to include community and educational facilities.

As noted above, density and design policies are established by the Core Strategy and London Plan, though we suggest that proposals for any new development be in the order of two to three storeys high. The type and mix of new homes to be provided should respond to local needs and be built to high standards of sustainability.

POLICY STNP 6

High quality new developments will be encouraged within Sudbury Town where appropriate. In particular, the redevelopment of inappropriate uses within the town centre will be encouraged. Inappropriate uses are those which aren't classed as main town centre uses in the NPPF³⁰ and have negative impact on amenity.

Developments within the town centre should comprise an appropriate active town centre use at ground floor level, in line with Policy STNP 1, and residential units (C3 use) or offices (Use Class B1) on upper floors.

The community will promote and support development that results in the strengthening of Vale Farm as a regional centre for sports excellence. Improvements to Vale Farm should not result in the loss of any green or open space. Change of use and development other than for uses which support recreational, sporting and amenity use will not be permitted at Vale Farm.

³⁰ See NPPF, Annex 2: Glossary

What's not in the plan?

The primary focus of the neighbourhood plan is on improving the quality of the town centre. This recognises the importance of creating attractive, viable and vibrant centres at the heart of the community.

Where a particular issue or subject is not covered in the neighbourhood plan, the Council's Core Strategy will provide the policy framework for shaping and determining planning applications. For example, if an application is made to the Council for an extension to a private house, it will be determined in accordance with the Core Strategy.

Figure 14: The Jubilee Parade, Sudbury Town, 2012





5. WHAT HAPPENS NEXT?

Submission to the Council

This document will be submitted to Brent Council along with a statement summarising the results of the consultation, a plan of the Neighbourhood Area and a statement setting out how the plan meets the Basic Conditions required under Part 5 Paragraph 15 of the Neighbourhood Planning Regulations. The Council will formally consult on the neighbourhood plan. Comments made at this stage will be submitted for consideration by an independent examiner.

Examination of the plan

The examination of the plan will look at whether it has met certain 'basic conditions', for example, having regard to national policy objectives and whether it is in general conformity with the strategic objectives of the development plan (see Appendix B for more information).

Referendum

Should the examiner be satisfied that the neighbourhood plan meets these basic conditions, it will be recommended that a referendum takes place. At the referendum, those people of voting age residing in the neighbourhood plan area will be able to vote on whether they want the plan to come into force or not. If more than 50% of all people who vote say 'yes', then the plan can start to be used for planning purposes.

Consultation

This document will be published for public comment by Brent Council. The Council will publicise full details of the consultation,

Together, we can make a stronger plan for Sudbury Town, one that can really influence a positive future for the area.

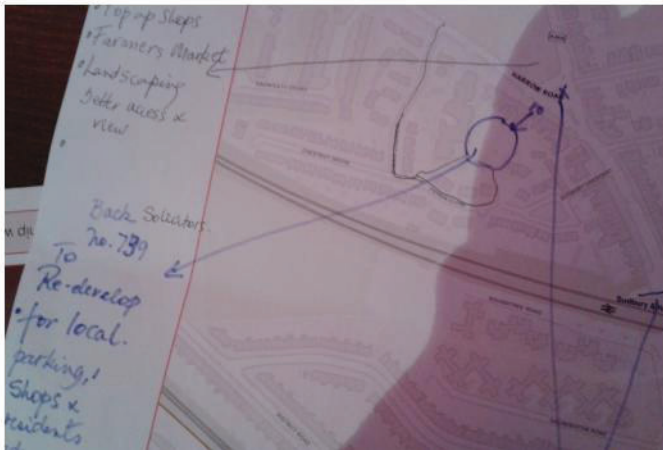
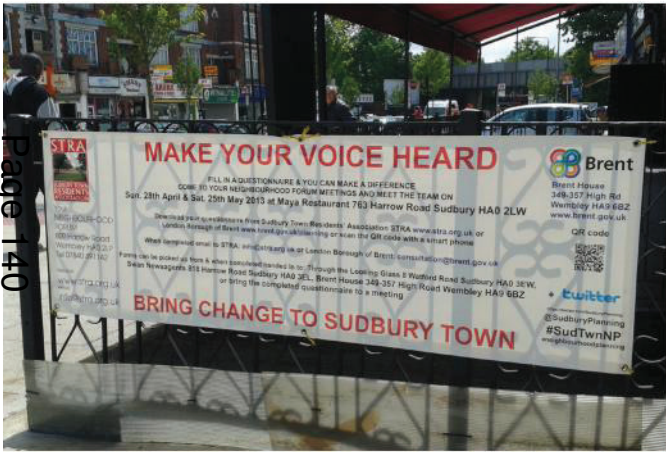
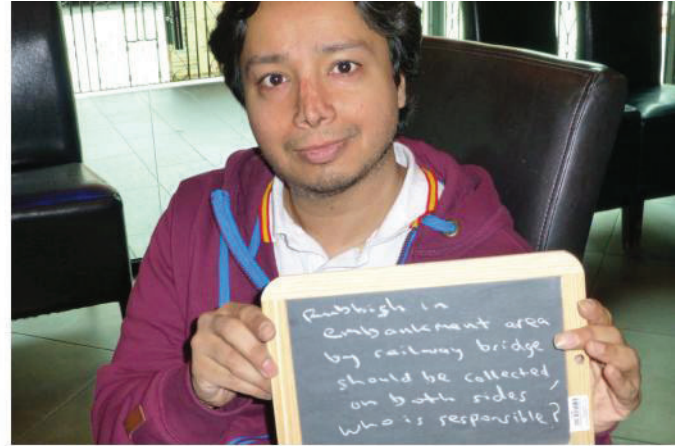
We want as many people as possible to be involved in the neighbourhood plan – and to be as excited by it as we are. This is an excellent opportunity for us to make a real difference in Sudbury Town.

So please do tell us what you think. And if you want to help us work on the plan then please let us know. We would love to hear from you.

>> STRA website: <http://www.stra.org.uk/>

>> STRA Facebook page: www.facebook.com/SudburyTown

>> STRA Twitter feed: [www.twitter.com/SudburyPlanning](https://twitter.com/SudburyPlanning)
[@sudburyplanning](https://twitter.com/SudburyPlanning) hashtag [#sudtwnNP](https://twitter.com/SudburyPlanning)



APPENDIX A: EXTRACTS FROM NATIONAL PLANNING POLICY FRAMEWORK

Selected neighbourhood planning extracts from the National Planning Policy Framework

Key neighbourhood planning extracts from the NPPF, including paragraph references:

- 1) *It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which **reflect the needs and priorities of their communities**.*
- 2) *The National Planning Policy Framework must be taken into account in the preparation of local and neighbourhood plans*
- 16) *Neighbourhoods should:*
 - *develop plans that **support the strategic development needs set out in Local Plans**, including policies for housing and economic development;*
 - ***plan positively to support local development**, shaping and directing development in their area that is outside the strategic elements of the Local Plan*
- 17) *Planning should:*
 - *be genuinely plan-led, **empowering local people to shape their surroundings**, with succinct local and neighbourhood plans **setting out a positive vision for the future of the area***
- 58) *Neighbourhood plans should **develop robust and comprehensive policies** that set out the quality of development that will be expected for the area*
- 76) *Local communities through local and neighbourhood plans should be **able to identify for special protection green areas of particular importance** to them. By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances.*
- 183) *Neighbourhood planning gives communities direct power to **develop a shared vision for their neighbourhood and deliver the sustainable development they need**.*
- 184) *Neighbourhood planning provides a powerful set of tools for local people to ensure that they **get the right types of development for their community**. The ambition of the neighbourhood should be aligned with the strategic needs and priorities of the wider local area. Neighbourhood plans must be in general conformity with the strategic policies of the Local Plan.... Neighbourhood plans and orders **should not promote less development than set out in the Local Plan or undermine its strategic policies**.*
- 198) *Where a planning application conflicts with a neighbourhood plan that has been brought into force, planning permission should not normally be granted.*



APPENDIX B: TESTING THE PLAN

The 'Basic Conditions'

For a neighbourhood plan to be brought into use it needs to meet a number of 'basic conditions'³¹. These are:

- the plan has regard to national planning policies;
- the plan contributes to the achievement of sustainable development;
- the plan is in general conformity with the strategic policies of the development plan for the area; and
- the plan is compatible with European Union law and human rights obligation.

This section presents a summary of conformity with the basic conditions. This is covered in full in the supporting document: Sudbury Town Neighbourhood Plan, Basic Conditions Statement, June 2014.

National planning policies

The emerging Sudbury Town neighbourhood plan, with its focus on the Town Centre, aligns well with the strategic policy direction.

The National Planning Policy Framework (NPPF) was published in March 2012. It promotes the delivery of growth, new homes and jobs. It is clear from the NPPF that the Government expects communities to plan positively to support local development. The NPPF also establishes policies that support the vitality and viability of town centres.

³¹ The legal source of the basic conditions is the Localism Act 2011 which inserted Schedules 4A and 4B into the Town and Country Planning Act 1990. Schedule 4B relates to neighbourhood development orders. Schedule 4A relates to neighbourhood development plans and applies parts of Schedule 4B to plans.

Furthermore, recent reviews and strategies published at a national level have been prepared that focus on various ways and means of improving town centres. The Mary Portas Review³², and the Government's response to this³³, has raised the profile and importance of high quality town centres. The Government has launched 'Parades to be Proud of'³⁴. This identifies a range of strategies that could be considered in local areas to help support and enhance local parades and centres. Amongst these, it recognises the role that neighbourhood planning, and planning as a whole, has to play.

Sustainable development

Sustainable development is the 'golden thread' running through national policy objectives. It should be considered in all plan making decisions and applications. The NPPF makes it clear that

'sustainable development is about change for the better.... is about positive growth – making economic, environmental and social progress for this and future generations.'

'planning must be a creative exercise in finding ways to enhance and improve the places in which we live our lives... This should be a collective enterprise.'

The NPPF goes on to say that:

Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life, including (but not limited to):

³² <https://www.gov.uk/government/publications/the-portas-review-the-future-of-our-high-streets>

³³ <https://www.gov.uk/government/publications/high-streets-at-the-heart-of-our-communities-government-response-to-the-mary-portas-review>

³⁴ CLG, June 2012, Parades to be Proud of: Strategies to support local shops

- *making it easier for jobs to be created in cities, towns and villages;*
- *moving from a net loss of bio-diversity to achieving net gains for nature;*
- *replacing poor design with better design;*
- *improving the conditions in which people live, work, travel and take leisure; and*
- *widening the choice of high quality homes.*

Plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas.

We believe the emerging neighbourhood plan aligns well with the achievement of sustainable development.

The 'development plan'

The 'development plan' for the Sudbury town neighbourhood plan comprises the London Plan³⁵ and the Brent Local Development Framework³⁶, specifically the Brent Core Strategy³⁷. These are taken in turn below.

The London Plan

The London Plan is the overall strategic plan for London. The London plan establishes a range of strategic policies that need considering within the neighbourhood plan. Policy 2.6 seeks, for example, to enhance the quality of the outer London neighbourhoods, such as Sudbury, and Policy 2.15 is focussed on creating a network of successful, accessible, diverse and attractive town centres. The focus of this neighbourhood plan thus aligns well with these policies.

More recently, the GLA has published draft supplementary planning guidance (SPG) to the London Plan focusing on town centres³⁸. This recognises the important role that town centres play in London, that *'they are at the heart of communities, providing a sense of place and identity'*.

The draft SPG has not yet been adopted but does indicate the likely policy approach to be taken. It provides further advice on policies in the London Plan³⁹ in relation to:

- Promoting the vitality and viability of town centres, including neighbourhood and local centres.

³⁵ GLA, July 2011, The London Plan: Spatial development strategy for Greater London

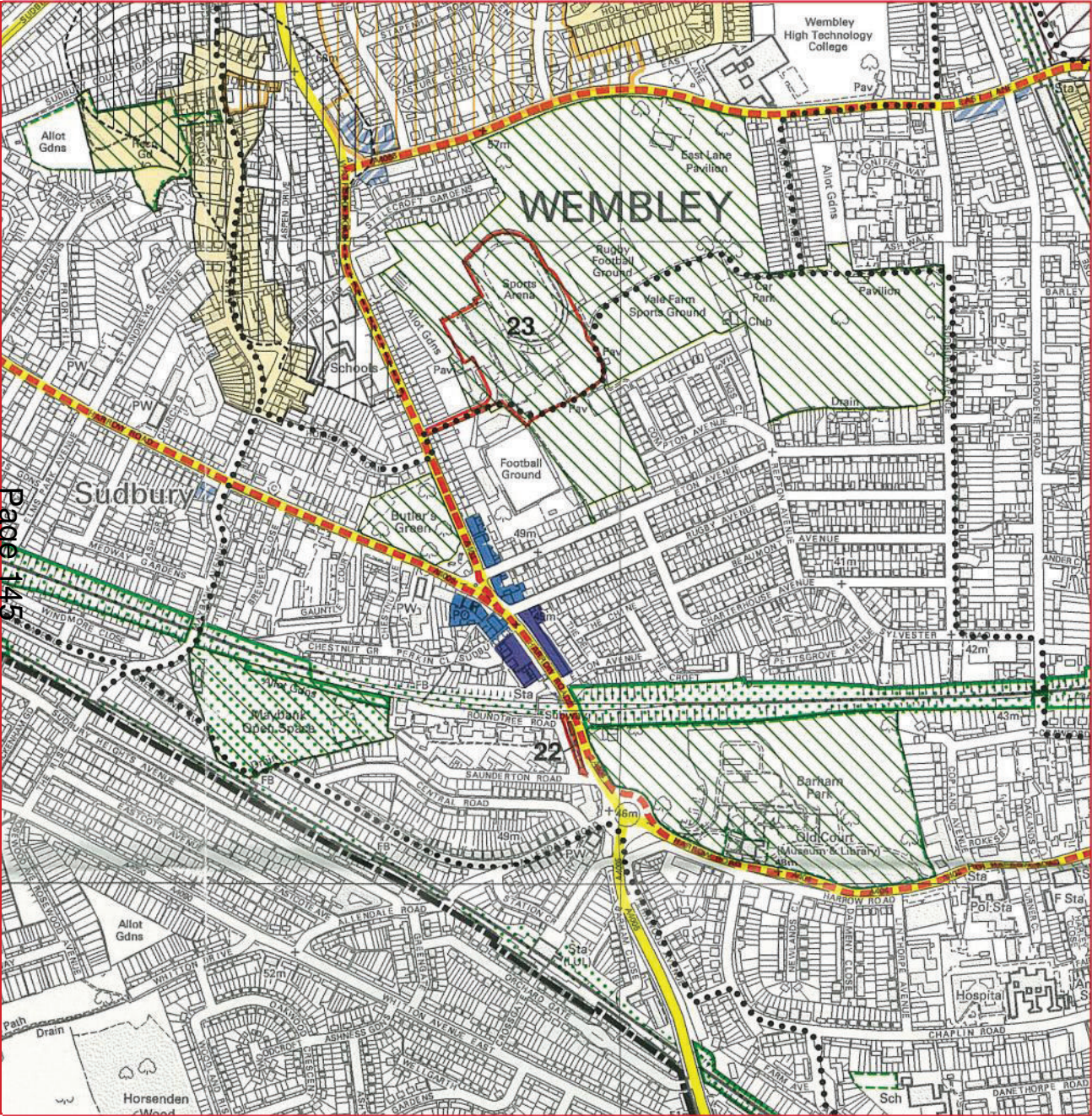
³⁶ <http://www.brent.gov.uk/services-for-residents/planning-and-building-control/planning-policy/local-development-framework/>

³⁷ Brent Council, July 2010, Brent Core Strategy

³⁸ GLA, January 2013, London Plan 2011: Draft Supplementary Planning Guidance, Town Centres

³⁹ The draft SPG provides further guidance on London Plan policies 2.15 (Town Centres) and 2.16 (Strategic Outer London Development Centres)

Figure 15: Sudbury Town extract from the Brent Core Strategy Proposals Map



Town Centres and Shopping	
Primary Shopping Frontage	SH6, SH7
Secondary Shopping Frontage	SH9
Local Centres	SH16
Ealing Road Town Centre Boundary	SH31
Open Space, Sport and Recreation	
Metropolitan Open Land	OS1-OS3
Green Chains	OS5
Public Open Space	CP18
Sites of Special Scientific Interest	OS12
Local Nature Reserves	OS16
Sites of Metropolitan Nature Conservation Importance & Sites of Borough (Grade 1) Nature Conservation Importance	OS12
Sites of Borough (Grade 2) Nature Conservation Importance & Sites of Local Nature Conservation Importance	OS13
Wildlife Corridors	OS14
Capital Ring (Metropolitan Walk)	OS21
Waste	
Waste Management/Manufacturing Areas	W4
Site Specific Allocations	
15 Site Specific Allocations	
Borough Boundary	
Growth Areas	
Growth Area Boundary	CP7, CP8, CP9, CP10, CP11
Built Environment	
Conservation Area	BE25-BE28
Grand Union Canal Policy Area	BE14, OS5
Archaeological Priority Area	BE31
Areas of Distinctive Residential Character	BE29
Environmental Protection	
Notifiable Pipeline	EP8
NB Areas at risk of flooding are not shown as flood zones are subject to change and re-modelling on a frequent basis. Latest Environment Agency flood map should be referred to.	
Transport	
Strategic Routes of National or Regional Importance	TRN18
London Distributor Roads	TRN20
London Bus Priority Network	TRN9
London Cycle Network	TRN11
Employment	
Strategic Industrial Location	CP20
Locally Significant Industrial Sites	CP20

- Supporting a vibrant mix of uses in town centres including retail, leisure, culture, tourism, business, social infrastructure and housing.
- Accommodating growth in demand for new town centre floorspace within centres or in well integrated edge of centre development sites.
- Bringing back into use vacant or under-used premises.
- Promoting inclusive access by public transport, shopmobility, walking and cycling to the range of goods and services in town centres.
- Advancing the role of town centres in promoting safe, healthy, sustainable neighbourhoods with quality design and public realm, now and for the future.
- Developing the sense of place and identity of town centres, making them places that people will want to visit.

We think that the ambitions outlined in this neighbourhood plan align well with this policy direction.

Brent Core Strategy

The Core Strategy was adopted in July 2010. It contains twelve strategic objectives. They are listed below, with the neighbourhood plan response to these also shown. An extract of the Core Strategy proposals map, as it relates to Sudbury Town, is shown in figure 15.

Table 2: Relationship between the neighbourhood plan and strategic objectives of the Brent Core Strategy

Core Strategy objective		Sudbury Town neighbourhood plan response
01.	To promote economic performance and regeneration	▪ Encouraging a more diverse mix of shops and activities in the town centre
02.	To meet employment needs and aid the regeneration of industry and business	▪ Enhance town centre public realm and promote shop front improvements. ▪ Promote redevelopment of existing inappropriate uses in and around the town centre in order to enhance the quality and vitality of the town centre
03.	To enhance the vitality and viability of town centres	▪ Enhancing the quality of the public realm, pedestrian environment and general streetscape ▪ Encourage a more diverse mix of shops and activities in the town centre
04.	To promote the arts and creative industries	▪ Enhance the quality of the public realm ▪ Potential for public art to enhance the environmental quality beneath the railway bridge and on shutters and vacant shops in the town centre
05.	To meet social infrastructure needs	▪ Promote a new / replacement library and education facilities and other community facilities ▪ Enhance quality of green spaces ▪ Promote more diverse range of uses within the Town Centre ▪ Promote public access and reuse of the former London Wasps RUFC training ground and Clubhouse

06.	To promote sports and other recreational facilities	- Strengthen Vale Farm as a regional centre for sports excellence - Promoting the increase of sports and play equipment in Barham Park - Promote better and safer cycle routes - Promote public access and reuse of the former London Wasps RUFC training ground and Clubhouse
07.	To achieve housing growth and meet housing needs	Identifying appropriate development opportunities
08.	To reduce the need to travel and improve transport choices	- Promote improved walking and cycling conditions - Introduction of cycle parking facilities, particularly at the underground and overground stations - Seeking to increase the frequency of stopping services at Sudbury & Harrow railway station - Promote a vibrant high street with a mix of uses
09.	To protect and enhance Brent's environment	- Protect and enhance the quality of the green spaces in Sudbury Town (Barham Park, Butlers Green and Vale Farm) - Promote public access and reuse of the former London Wasps RUFC training ground and Clubhouse - Clearing of litter and fly-tipping from the town centre and open spaces
10.	To achieve sustainable development, mitigate and adapt to climate change	Enhancement of the town centre, through public realm improvements and greater mix of shops and facilities, as

		well as appropriate new development
11.	To treat waste as a resource	N/A: detail to be provided by Core Strategy
12.	To promote healthy living and create a safe and secure environment	- Improving the quality of the pedestrian environment in the town centre, streets and spaces - Promoting a design-led approach to street improvements and new buildings that seeks to reduce crime and the fear of crime - Promoting new cycle parking facilities and improved cycle routes - Protecting green spaces and promoting new sports provision in Barham Park and at the former London Wasps RUFC training ground



APPENDIX C: ABOUT STRA

STRA was established in February 2011 with its mission statement a Safer, Greener and Cleaner Sudbury, which clearly puts across what STRA wishes to achieve. STRA ensures that every member has the opportunity to be informed on the process and progress of the Neighbourhood Forum and have endeavoured to encourage and invite local businesses to become part of this movement for change and productive use of land.

At the onset the Executive Committee with the eight lead positions, set down a clear constitution with defined reporting lines. Meetings are held on the third Tuesday of every month in a local church hall with a refreshment break to allow members and guests to interact with each other. The minutes and agenda are emailed to members and posted or delivered to those without access to the internet. Meetings are well attended with the occasional guest speakers on relevant subjects. Attendees are encouraged to ask questions and get involved. STRA ensures that every member has the opportunity to be informed on the process and progress of the Neighbourhood Forum and have endeavoured to encourage and invite local businesses to become part of this movement for change and productive use of land.

We have a web page which is regularly updated with current issues, events, planning applications, local history, street briefing and invitations to encourage residents to become actively involved. This page links into our Twitter and Facebook updates. We have instigated a bi-monthly e-newsletter which is also delivered to those without email, to keep our residents informed.

Our initial consultations for the Neighbourhood Forum were well attended by residents and businesses.

We have great support from our local Councillors and the Safer Neighbourhood Team.

Our role is to convince the residents and businesses of Sudbury to play take an active part in helping to enforce the positive changes and make Sudbury a pleasant place to live and work. The more people who join the Residents' Association the stronger is our voice.

Figure 16: STRA 'clear-up' campaign



**THE
PROPOSED**

**SUDBURY
TOWN**

NEIGHBOURHOOD PLAN

Sudbury Town Neighbourhood Plan

Regulation 15 of the Neighbourhood Planning (General) Regulations 2012
Draft Final Neighbourhood Plan
July 2014

Sudbury Town Neighbourhood Forum

c/o Sudbury Town Residents' Association
Church Hall
809 Harrow Road
Middlesex HA20 2LP

www.stra.org.uk
info@stra.org.uk

Brent Council

The Planning Service
Brent Civic Centre
Engineers Way
Wembley HA9 0FJ

www.brent.gov.uk
ldf@brent.gov.uk

Prepared with financial support from the Community Development Foundation



 Brent	Cabinet 13 October 2014 Report from the Strategic Director of Regeneration and Growth
Wards affected: ALL	
The New Community Access Strategy	

1.0 Summary

This report sets out proposals for transforming the arrangements that we have in place to enable residents to access information and services more easily and more efficiently. The aim of the new strategy is both to improve residents' experience when they do contact Brent and increase the efficiency of our overall operating arrangements. Central to the new access strategy will be:

- the use of resident insight to design access arrangements that are better tailored to the needs of different demographic groups in Brent;
- significantly improve access to services and information through digital channels and thus enable residents to transact with the Council easily and conveniently without having to phone, visit or write in;
- to improve residents' experience when they telephone us so that their enquiry is resolved quickly and efficiently;
- to target a more personalised approach to those with more complex needs;
- to develop a "Tell us Once " approach for residents enabling information they provide for one service to be proactively shared with other services they may require and thus eliminate the need for this to be provided more than once.

2.0 Recommendations

- 2.1 Cabinet is asked to approve the new Access Strategy and the planned implementation of this, as set out in Section 3 of this report.

3.0 Detail

Background

- 3.1 The Access Strategy has been designed to support the wider aims of the Brent Borough Plan and corporate strategic objectives. The overall aims of the strategy are to:
- Develop a consistent and excellent experience for our residents whenever and however they make contact with us;
 - Develop access arrangements that are designed to meet the differing needs of our residents and focused on their needs in a more joined-up way;
 - Develop an improved digital offer, better resident confidence in digital access channels and significantly increase take up and use of on line access channels;
 - Ensure that residents only need to 'tell us once' rather than being required to provide the same information on multiple occasions.
 - Ensuring the access strategy supports resilient communities and builds the independence and capacity of our communities
 - Ensuring the access strategy improves the efficiency of contact management and delivers cashable savings.
- 3.2 The Access Strategy sets out Brent's vision for transforming the way in which residents are able to access information, advice and services. It builds on the work already undertaken through the Future of Services project and seeks to create modern and relevant access arrangements that are tailored to meet the needs of differing demographic groups, help us to respond positively to the financial pressures we face and to target our most personalised contact arrangements to those who are most vulnerable and have more complex needs.
- 3.3 Underpinning the strategy is a high level set of key design principles that will inform the reconfiguration of existing contact handling arrangements:
- Resident and performance insight will be used to determine how access arrangements should be designed to best meet residents' needs;
 - Access arrangements will be simple to use and responsive;
 - Residents will be able to 'tell us once' - and the information that is provided once will be used many times;
 - Enquiries will be resolved at first point of contact;
 - Access arrangements will have a consistent look and feel and service standards will be consistent across all services;

- Access will be ‘digital by design’ - meaning that residents will be able to access services and information whenever they want without having to telephone, write or visit our buildings.

The New Community Access Strategy

- 3.4 It is proposed that the Council opens up online opportunities for residents, businesses and visitors in a way that it hasn’t done before. Although people will still be able to contact us by telephone and face to face, the strategy proposes that for many residents, the first point of contact will be online. This reflects the increased use of technology by residents and the ease of online access through smartphones and tablets. Many of our most vulnerable and older residents will still want to contact the Council by telephone or face to face and the proposed new arrangements will support this, but increasingly experience is showing that they also rely on family members for assistance and that those family members expect to be able to do things online too.
- 3.5 The strategy reflects the need to target our increasingly limited resources to those with the most complex needs. A clear way of achieving this is to support those who are willing and able to ‘self serve’ through online transactions to do so and diverting some of the efficiencies achieved by doing this to providing a better telephone and face to face service for those with more complex needs.
- 3.6 Central to the success of the Access Strategy will be the development of a more joined up approach to services that will be designed from residents’ perspectives. The approach will need to drive cashable savings and efficiencies within Council services by consolidating and in some cases centralising access arrangements, whilst at the same time simplifying arrangements for residents to access the Council.

The New Operating Model

- 3.7 A new Operating Model will be implemented to support the achievement of the new access strategy. This will set out the organisational arrangements we will need to have in place to support the delivery of the new Access Strategy. It will set out how we will do things in Brent and more particularly how we will engage with our residents, businesses and visitors as a Council.

Using the Access Strategy as the foundation, the new operating model will define:

- Working practices
- Processes
- Information requirements
- Required capabilities and technology

The new operating model will set out the changes that will need to be made to existing arrangements to transform our contact arrangements. It will drive our approach to ‘channel shift’ by setting out how we will ensure more interactive transactions and information are available online 24:7, how we will support residents to use the internet, how we will encourage more people to use the web and/or phone and how we will maintain or improve face to face

interactions for those with the most complex needs. It is the new operating model which will drive improved performance and deliver on-going budget savings and efficiencies. Appendix A illustrates our current operating arrangements and the proposed new operating arrangements.

What will Change?

(i) Contacting the Council 24:7 – Online

Central to the proposed new approach is a step change in the way in which residents can access services and information on line. To achieve this it is planned to implement a new web portal on our web site which will allow residents to create their own 'My Brent' account, authenticate themselves once and then be able to access a range of services without having to enter a separate password for each system. The new portal will act as a front door for all on line services - both existing and new. All existing on line services will be made available through the new portal through a phased approach between November 2014 and June 2016. The portal will also enable us to support proactive and 'intelligent' signposting for residents to other services that may be helpful to them – for example 'did you know that you may be entitled to Council Tax discount?', 'would you like to book a course?' or 'if you need help to find a job then these organisations might be able to support you'.

A procurement process is currently underway through a framework agreement led by Wandsworth. Recommendations about the preferred supplier are scheduled to be considered by the Cabinet on 11 November 2014.

Key Milestones

New web home page live	16 Sept 2014
Improved web search and analytics	31 October 2014
Procurement of web portal	Sept 14 – Mid November 2014
Portal implementation phase 1 : 4 key services plugged in (Revenues, Benefits, Waste and Recycling)	April 2015
Portal implementation phase 2 and 3 further 6 services plugged in (Indicative services : Parking, rents and repairs, pest control, land lord portal, " my location" functionality)	Sept 2015
Portal implementation phase 3-5 further 10 services plugged in (Indicative services : appointment booking, registrars , electoral registration, in year school admissions, free school meals, planning, housing registration, housing bidding, adult social care on line calculator, libraries)	June 2016

(ii) Improved Residents' Experience - Telephones

At the moment most residents choose to contact us by telephone and many either have to ring more than once before their call is answered or experience long waiting times. We need to ensure that residents do not need to telephone us by ensuring that they can easily access services and information on line. However we also need to ensure that when residents do telephone us their call is answered promptly and their enquiry is resolved quickly and efficiently.

The new operating model aims to improve our ability to answer all calls by centralising the management of telephone contact handling and rolling out much wider use of Automated Call Distribution (ACD) technology to support this. Currently only about 25% of all calls to the Council are handled through ACD technology with all other calls handled by numerous teams across the Council using smart phones and handsets. ACD technology better supports the management of high volumes of calls, with a much higher degree of flexibility in routing calls to groups of staff with the relevant knowledge and expertise to resolve the enquiry. It also provides comprehensive management information about volumes of calls received and the time and reason for the call. Using this and centralising the management of telephone call handling will enable us to develop a much better understanding of overall telephone contact, better align resources to handle that contact and then be able to use information about the calls to develop and improve our web offer. We aim to centralise call handling and implement ACD technology in a phased way - with the first phase commencing in the autumn of 2014. A clear phasing plan will be developed alongside the planned phasing of the new web portal. It should be noted that ACD calls can be routed through headsets, handsets or through smart phones and so this offers a high degree of flexibility in meeting the differing operational needs of services across Brent. It is envisaged that the vast majority of ACD calls will be routed through either headsets or handsets as these provide the best option for handling high volumes of calls.

The contract for the current ACD system is due to expire in March 2015 and thus a competitive procurement exercise is planned to test the market and procure a new contract by April 2015. Cabinet approval to undertake this procurement is being sought on the 13th October 2014. Cabinet approval is also being sought to extend the existing contract to September 2015 to prevent disruption to call handling during the peak period of Council Tax main billing concurrent with the new charging arrangements for green waste going live.

Key Milestones

Procure new ACD contract	October 2014- March 2015
Extend use of ACD Phase 1 Phase 2	October 2014- September 2015
80% of external calls handled through ACD	October 2015
Telephone handling centralised Phase 1 Phase 2 Phase 3	October 2014 –March 2015 April 2015 –September 2015 October 2015- June 2016

80% of calls handled centrally	June 2016
Number of published numbers reduced from 89 to 40	September 2015
From 40 to 30	June 2016

(iii) **Modernising our Face to Face Offer**

Currently residents can access face to face services at both the Civic Centre and at Harlesden Job Centre Plus. The latter is a temporary provision pending the opening of the new Library at Willesden Green. Current face to face provision is based on a traditional model consisting mainly of one to one interviews between a resident and an officer with a much smaller self service offer. This is reflected in the current physical configuration of both service centres which consists of larger numbers of individual interview booths with a much smaller number of self service kiosks.

The Civic Centre Service Centre includes dedicated self service space on the ground floor which has proved to be very popular with visitors. Members of staff are available within this area to assist visitors to use the self service facilities and also to encourage use of on line services where these are available. The current configuration of the Service Centre will need to be adapted to meet the increasing demand for self service with a concurrent reduction to the numbers of visitors requiring a more traditional face to face interview. Proposals are therefore being drawn up to change the layout of the service centre at the Civic Centre to reflect the need for greater self service provision in the future and to relocate the reception from the mezzanine floor to the ground floor to ensure that visitors' needs can be quickly assessed when they approach the ground floor area.

It is also proposed that the arrangements for the proposed service centre at Willesden Green are changed so as to better support the new community access strategy. The proposition is that the new library at Willesden Green will offer self service facilities within the wider library space, enabling visitors to access services on line and to use freephones where there is a need to speak to an officer. Library staff will be able to provide basic support to residents who may need some help to log on to the self service facilities. Once logged in, staff will be available via free phones to help guide visitors through the on line process, where this is required. Weekly surgeries will also be available on an appointment basis for more vulnerable residents who need additional support to see an officer for a face to face interview.

In the two years since the old Willesden Green Library Centre has closed there has already been a significant shift in the availability of on line services and residents' willingness to transact on line and this trend is set to continue. An analysis of the take up of the interim service centre at Harlesden shows comparatively low levels of residents accessing face to face facilities compared to the Civic Centre, with 20% of residents going to Harlesden and 80% to the Civic Centre. Most visitors to Harlesden do so to report a benefit change in circumstance or to claim benefit for the first time. In fact 83% of demand at Harlesden is related to benefit transactions or enquiries. With the launch of the E-benefits application form earlier this year, 50% of new applications are now being submitted on line without support from a Brent

officer. The remaining 50% of applications are being completed on line with assistance from a Brent Officer. Consequently there has already been a reduction in face to face visitor which at Harlesden represents circa 41 % since 2012/13. (from an average of 1836 per month in 2012/13 to 751 per month in August 2014). This reduction is forecast to accelerate when the on line benefit change in circumstances form launches in the autumn of 2014. Face to face provision needs to reflect this shift in demand patterns and better support the move to on line service take up.

Consolidating provision for face to face interviews into one Service Centre at the Civic Centre would bring the Council into line with many other London Boroughs and would deliver a significant financial saving at a time of severe financial pressure.

For those residents with complex needs that require face to face contact there will be a drive to improve their experience. A series of measures are currently being considered, including:

- 'Tell us once' – so that residents no longer need to re-provide the same information every time they try to access a different service;
- Better integration of services – for example, so that residents can have a single conversation about their employment, benefits and housing needs rather than experience 'hand offs' between different departments as currently happens. The Council is keen to explore how other organisations can be integrated into this model;
- Improved signposting – to services provided by other organisations, particularly in the voluntary and community sector, who may be able to provide better or additional support than the Council;
- Peripatetic face to face access – we will continue to offer home visits to our most vulnerable residents and appointments for face to face interviews at the library at Willesden Green on a weekly surgery basis. Options for working with key stakeholders such as registered social landlords and the voluntary sector are also being explored which could facilitate joint surgeries at the Civic Centre, Willesden or other locations on a more ad hoc basis.

There are other implications for this approach in respect of the new Library at Willesden, including the opportunity to make use of the surplus space in the new building for alternative uses that are of public benefit and in keeping with the ethos of the building. It is proposed that the Council enter into a local dialogue about options for alternative uses in the space. Any use of the space will need to be income generating and as a minimum will need to cover the proportionate running costs such as Business Rates, heating, lighting, cleaning and maintenance.

(iv) An Improved Experience for our Residents

Underpinning all four of the above will be a review of current service design and processes with a view to delivering an enhanced user experience, so that

residents can expect their initial enquiry to be resolved at first point of contact rather than be passed to a number of different officers and services. Residents should also be clear about who will respond to their enquiry, by what method (email, phone call, text, and letter) and by when. This will require on-going reviews of end to end service design, processes, job roles and staff skills – all of which will be integral to the delivery of the Community Access Transformation programme.

Key Milestones

Increase self service in Service Centres (north and south)	
Phase 1	By October 2014
Phase 2	By January 2015
Reconfigure physical lay out of Service Centre at Civic Centre	By January 2015
Vacate Harlesden Service centre	1 July 2015 (subject to the library at Willesden opening by July 2015)
New Willesden offer live	30 June 2015 (subject to confirmation)

(v) Tell us once

Services will be redesigned so that they make much better use of shared data with the aim of ensuring that residents only need to provide key information once. For example, if proof of income /savings is required for a range of different services the resident should only have to provide those details on a single occasion. Opportunities for sharing data between services will be identified and used to help inform development of the Council's client index system. Work is already underway to support service to identify opportunities to support the 'tell us once' approach.

Key milestones

Scope work streams " Tell us Once "	December 2014
Review processes in scope	
Phase 1	April 2015
Phase 2	June 2015
Phase 3	Sept 2015
Implement process and system changes to support process redesign for each phase	
Phase 1	June 2015
Phase 2	Sept 2015
Phase 3	Dec 2015

(vi) Shorter processes

We will have fewer hand offs and there will be a clear understanding of timescales and the methods of responding. We will also deliver an improved user experience. Residents and businesses will know what to expect and by when and their queries will be resolved.

3.8 Summary of the high level implementation plan

Appendix B sets out the high level implementation plan for delivering the new operating arrangements and achieving the aims of this strategy.

4.0 Financial Implications

- 4.1 The estimated one off costs of web improvements including the new web portal, new home page and other web improvements is £668,000 but this will be subject to the outcomes of the portal procurement. The forecast running costs of the new portal will be circa £57,000 per annum.
- 4.2 Indicative one off costs of £90,000 have been identified to support improvements to telephony, developing shared data capability through the client index and minor physical changes to the Service Centre at the Civic. These will be firmed up as the implementation plan is developed.
- 4.3 Indicative project delivery costs of £220,000 - £250,000 have been identified as part of the early resource scoping for the overall implementation plan. These will be evaluated further during the development of the detailed implementation plans and revised as appropriate. These costs will be incurred over the initial 12 months of the project only and include a senior programme manager, a telephone project manager and 3 full time project officers. Funding is being sought from the One Council Board to meet project delivery costs.
- 4.4 Options for exploiting technology to support more effective remote and mobile working are also being evaluated. The cost of this will be dependent on the preferred solution and the extent to which this will deliver a better resident experience and cashable savings. Funding will be sought through the One Council Board if a robust business case can be proven.
- 4.4 An explicit aim of the Access Strategy is to improve the efficiency of our current arrangements and deliver savings. These savings will be identified at each phase of delivery and will be tracked centrally to ensure visibility of total savings realised and ensure that there is no double counting of savings. Based on channel shift achieved in specific services and previous projects relating to contacts made with the Council, it is estimated that cashable savings in the region of £1.5million can be achieved. This estimate is based on reductions to the telephone contact, channel shift to digital channels and streamlining of processes through use of shared data. The indicative savings estimate will be reviewed at each phase of implementation and will be subject to confirmation that it can be achieved over and above any other savings that have already been identified.

5.0 Legal Implications

- 5.1 The Council's constitution and due governance requirements have been complied with. There are no legal implications.

6.0 Diversity Implications and Equality Analysis

- 6.1 An equality impact assessment for the new community access strategy is attached as Appendix C. The overall impact assessment indicates that the extension of on line access to services could benefit many protected groups providing easy and convenient access on a 24/7 basis. As all channels of contact will remain available, the strategy offers all residents, including those in protected groups enhanced and improved access arrangements. The reconfiguration of the Services centre at Willesden will reduce the availability of face to face interviews with officers, however these will still be available at the Civic Centre and at Willesden by way of a weekly surgery. Residents using self service computers located in the library at Willesden will also be able to speak to an officer using free phones to assist them with any enquiries or to support them through the self service process. During the early stages of the opening of the new Willesden library, staff will be available to provide details about the options available for face to face enquiries from both the Civic Centre and Willesden.

All of our residents and businesses will be able to contact us by any of the three channels:

- (i) Web
- (ii) Telephone
- (iii) Face to face

We will be able to contact residents via telephone, text messages and social media. The new strategy will improve access arrangements as summarised below:

- (i) 50% of benefit claimants are in work and need to access services outside of their working hours and the web enables 24:7 access to services.
- (ii) Carers of frail older people and disabled people assist and/or lead on the assessments for care with agencies as they are the resident's main advocate. Adult Social Care have identified a trend which shows that carers prefer to transact online. Online assessments are not yet available in Brent.
- (iii) Residents complain of currently having too many log-ins and passwords.
- (iv) There is duplication across services as residents have to repeat information to each service that they interact with. The Community Access Strategy will introduce a "Tell Us Once" approach and assessments will be streamlined. Further, verification processes will be streamlined.

Brent's current website is not completely digital, for example pdf forms have to be printed.

We found out that residents:

- (i) Find it difficult to contact us by telephone, as the current mixed telephony systems do not work well.
- (ii) Are required to have a separate login and password for each service accessed on the Council website and they would like to have just one log-in and one password.
- (i) Find the current website “clunky” and difficult to use. Web searches were said to be difficult and pdf forms appear on the web site. Residents would prefer to transact digitally rather than have to print a pdf form.

The Community Access Strategy will address this.

6.2 The Web

The web will offer new and therefore more opportunities for protected groups. The web currently has, and will continue to have a “translate” option so that everything on the website can be automatically translated into another language.

Residents with hearing and visual needs will benefit from the web as all computers/phones (standard operating systems and browsers) allow with extra large font/text (visual impairment) and with sound/audio (Visual impairment).

The carers (including family and friends) of older frail residents will benefit from transacting and finding out about services online. Many carers try to balance caring with work and careers. They will be able to access the Council 24:7. This will reduce the need for frail and vulnerable residents from having to travel for assessments and appointments. Pregnant residents and residents with dependents will find the web more accessible and available at times which suit them.

It is important to note that whilst the strategy aims to significantly increase use of on line services, telephone and face to face access will remain available for those who may find it difficult to do so.

6.3 Text Messages and Social Media

The Council will be able to target residents and send out information in the form of texts and also social media messages. This will particularly appeal to young people, as they communicate using these mediums. Texting for example will be used to remind people of appointments and may assist residents with memory challenges.

Social Media such as Twitter will be used along with text messages to target particular geographical areas for example, “X school will be closed today due to snow.”

6.4 Telephone

The Council will ensure that telephones are on the Automated Call Distribution (ACD) system. Currently 75% of incoming calls are not on this system and in some areas up to 60% of calls are not answered or residents hang up. We do not have Management Information (MI) reports for non ACD calls but will have this when all incoming calls are routed through the ACD system. This will enable us to use the Management Information to continuously improve access and services.

The strategy will have a positive benefit on all residents making telephone contact as call answering performance improves.

6.5 Face to Face (F2F)

Face to face services will be available at The Civic Centre and in Willesden. There will be a focus upon assisted self service so that residents are supported and learn how to use the internet. Computers for self-service will be available at both face to face Centres. Appointments with staff will also be available

Face to face interviews will support residents with more complex needs.

- (i) Circa 50% of benefit claimants are in work and need to access services outside of their working hours and the web enables 24:7 access to services.
- (ii) Carers of frail older people and disabled people assist and/or lead on the assessments for care with agencies as they are the resident's main advocate. Adult Social Care have identified a trend which shows that carers prefer to transact online. Online assessments are not yet available in Brent.
- (iii) Residents complain of currently having too many log-ins and passwords.
- (iv) There is duplication across services as residents have to repeat information to each service that they interact with. The CAS will introduce a "Tell Us Once" approach and assessments will be streamlined. Further, verification processes will be streamlined. Brent's current website is not completely digital, for example pdf forms have to be printed.

We found out that residents:

- (i) Find it difficult to contact us by telephone, as the current mixed telephony systems do not work well.
- (ii) Are required to have a separate login and password for each service accessed on the Council website and they would like to have just one log-in and one password.
- (i) Find the current website "clunky" and difficult to use. Web searches were said to be difficult and pdf forms appear on the web site. Residents would prefer to transact digitally rather than have to print a pdf form.

The Community Access Strategy will address this.

Face to face interview will continue to be available for residents who need a more help and assistance in resolving their enquiry.

7.0 Staffing/Accommodation Implications (if appropriate)

- 7.1 There will be staffing implications arising from the implementation of the new strategy in terms of changes to staff numbers and roles.
- 7.2 The proposals to reconfigure Services Centres at both Harlesden and Civic Centre will result in changes to the physical layout of these access points.

Background Papers

The Community Access Strategy 2014

The PWC Telephony Report 2014

The Capita Target Operating Model report July 2014

Contact Officer:

Margaret Read

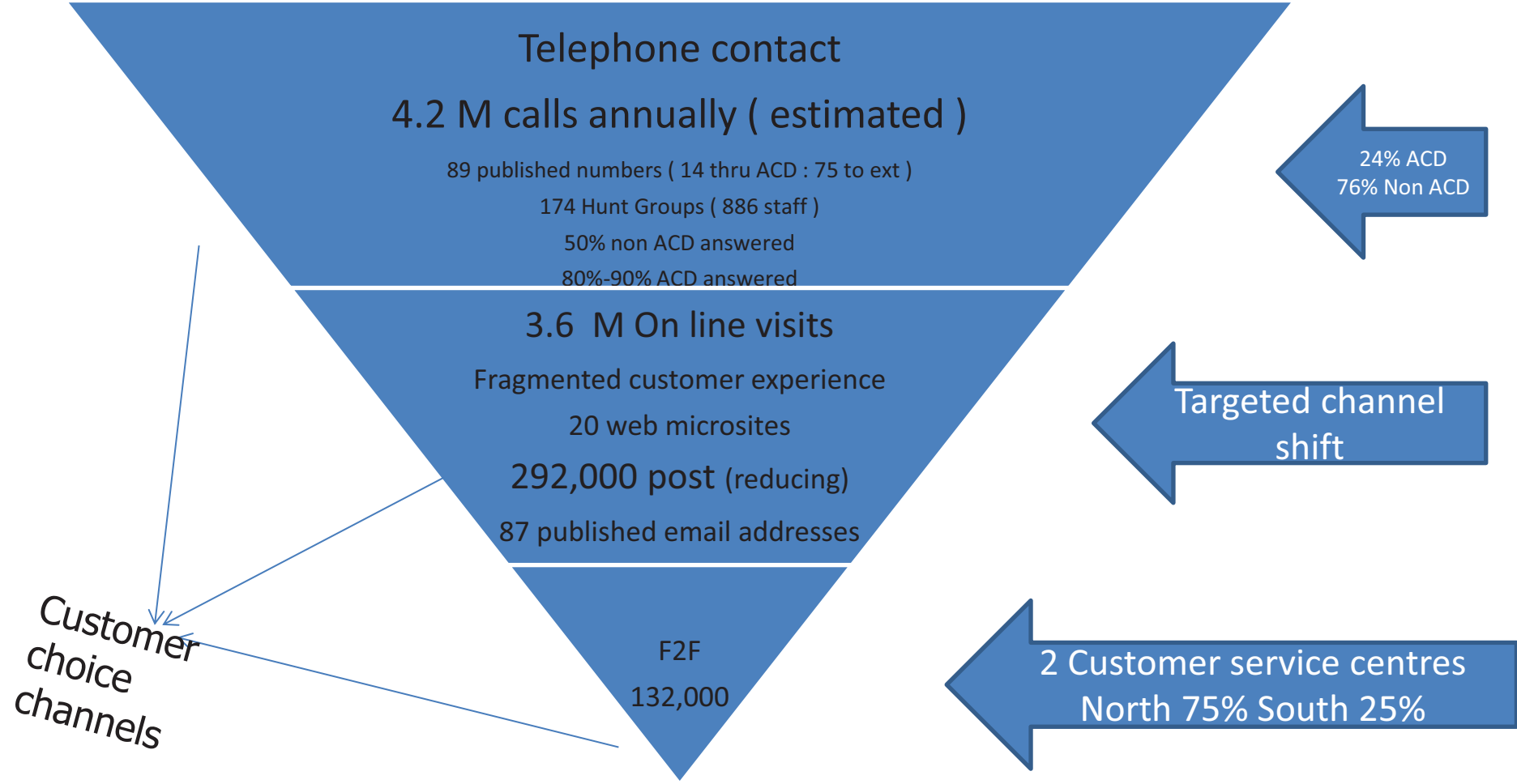
Operational Director, Regeneration and Growth

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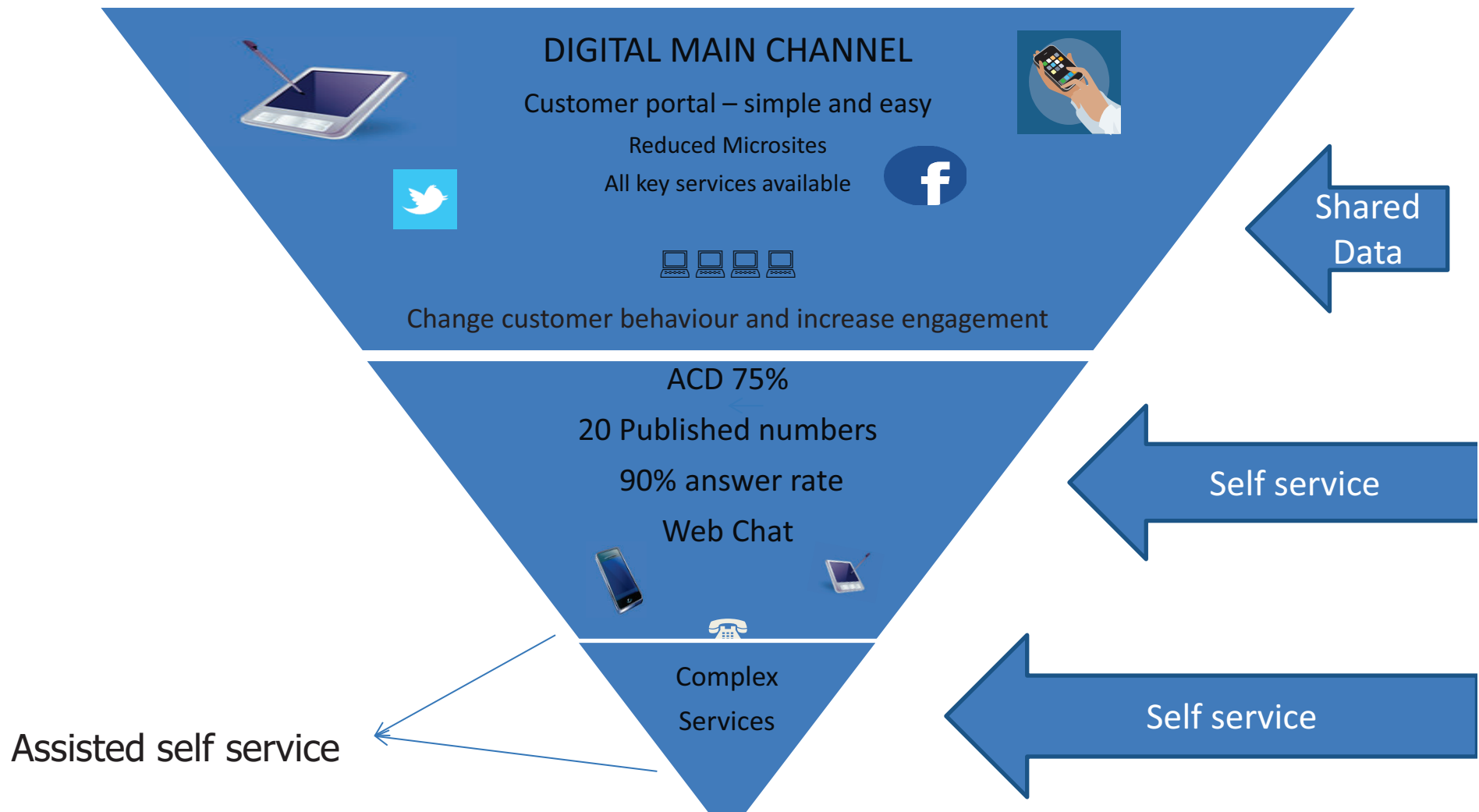
Strategic Director, Regeneration & Growth

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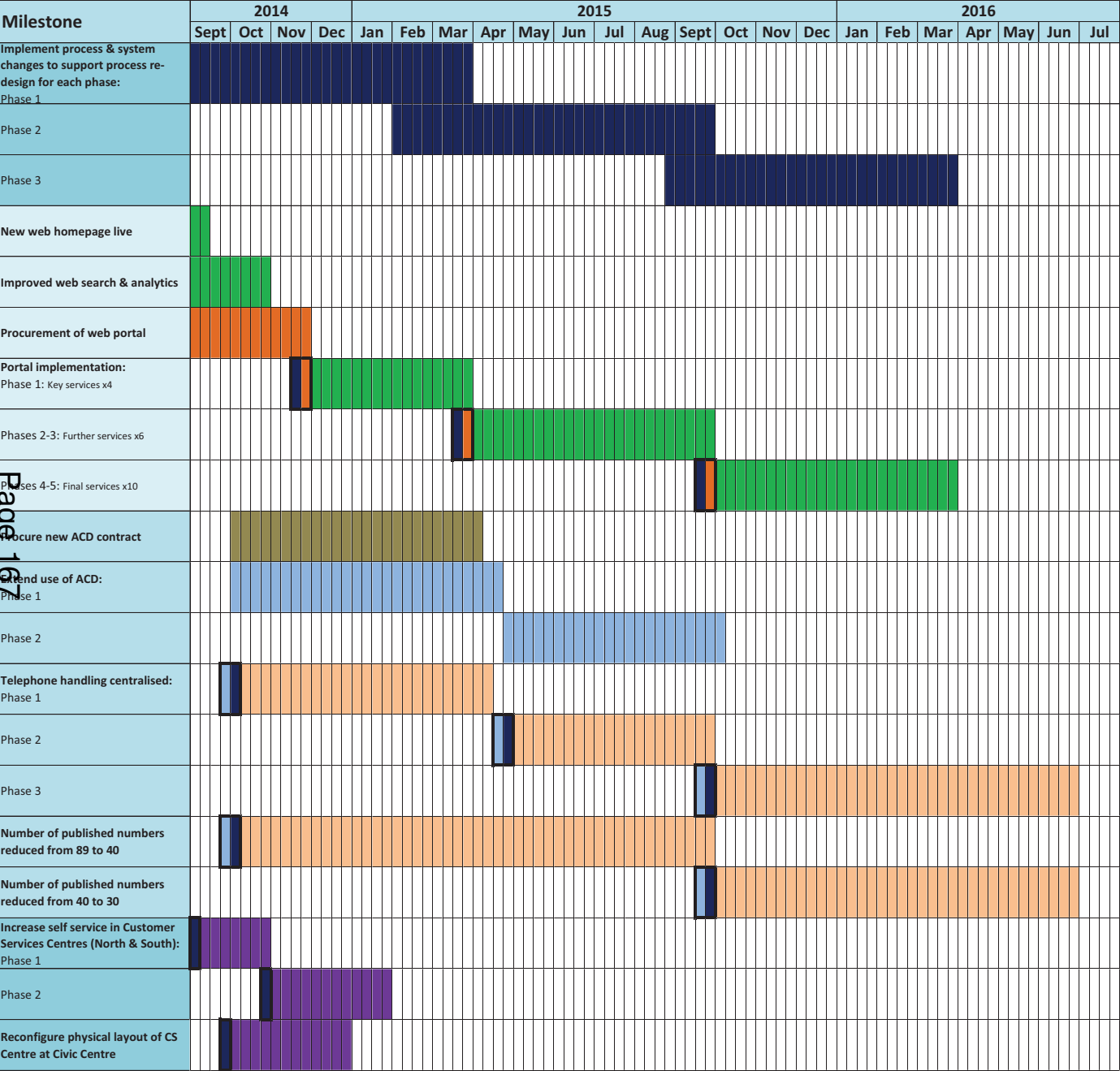
Current Operating Model

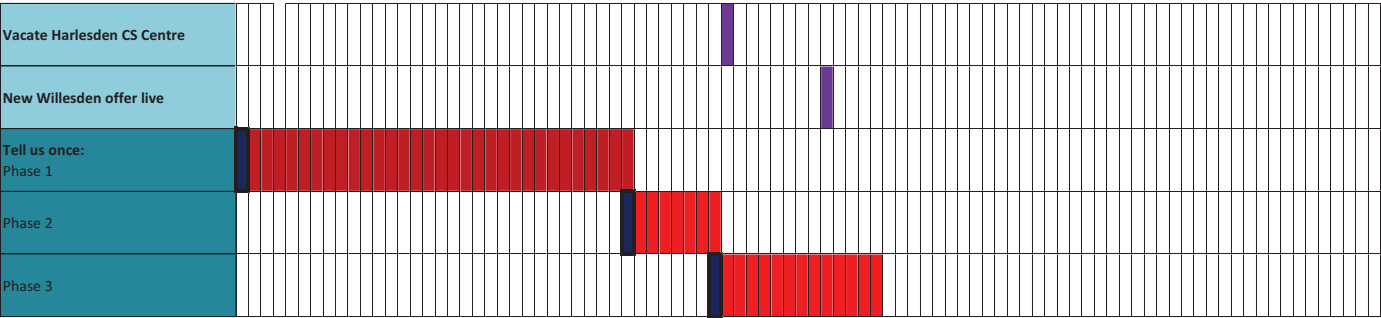


Customer Access Strategy



Customer Access Strategy - Milestone Gantt





Dependencies shown

2012

Equality Analysis

Guidance and Form



Brent Council Equality Analysis Form

Please contact the Corporate Diversity team before completing this form. The form is to be used for both predictive Equality Analysis and any reviews of existing policies and practices that may be carried out.

Once you have completed this form, please forward to the Corporate Diversity Team for auditing. Make sure you allow sufficient time for this.

1. Roles and Responsibilities: please refer to stage 1 of the guidance	
Directorate: Customer Services, Regeneration and Growth Service Area: Entire Council	Person Responsible: Name: Jeanette McGarry Title: Lead Customer Transformation Contact No: 020 8937 ext 6177 07787 274106 Signed:
Name of policy: The Customer Access Strategy	Date analysis started: Completion date Review date:
Is the policy: New ☒ Old ☐	Auditing Details: Name: Sarah Kaiser Title: Head of Diversity Date September 2014 Contact No: x4521 Signed:
Signing Off Manager: responsible for review and monitoring Name: Margaret Read Title: Operational Director Brent Customer Services Regeneration and Growth Date: _____ Contact No: 020 8937 1506 07867169832	Decision Maker: Name individual /group/meeting/ committee: Cabinet Date: 13 October 2014

Signed:	
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2. Brief description of the policy. Describe the aim and purpose of the policy, what needs or duties is it designed to meet? How does it differ from any existing policy or practice in this area?

The Customer Access Strategy sets out Brent's vision for transforming the way in which residents are able to access information, advice and services. It builds on the work already undertaken through the Future of Customer Services project and seeks to create modern and relevant access arrangements that are tailored to meet the needs of differing demographic groups, help us to respond positively to the financial pressures we face and to target our most personalised contact arrangements to those who are most vulnerable and have more complex needs. It offers various forms of access for customers including: the web, telephone and face to face. Currently, most contact by customers is via the telephone, the strategy aims to encourage the web to be the most used form of access.

3. Describe how the policy will impact on all of the protected groups:

Residents, businesses and visitors will be continue to be able to contact us by any of the following channels:

- (i) Web
- (ii) Telephone
- (iii) Post or email
- (iv) Face to face

There will be some changes to the way in which face to face access is provided from Willesden. This is dealt with in more detail later in this EIA

And we will contact them by web chat, telephone, post, email text, and social media.

Recent Mosaic Data tells us that the majority of residents prefer email contact (58.3%). –See the table at the top of p4

Channel Preference	Percentage of Brent households
Email	58.3
Landline	2.3

Mobile call	3.0
Post	15.3
Prefer not to be contacted	17.7
SMS	3.5

The Web

The web will offer personalised accounts via the introduction of a new web portal. The web portal will be **AA compliant** which means that our new web will be compliant with global access standards which particularly consider protected groups especially **people with disabilities**.

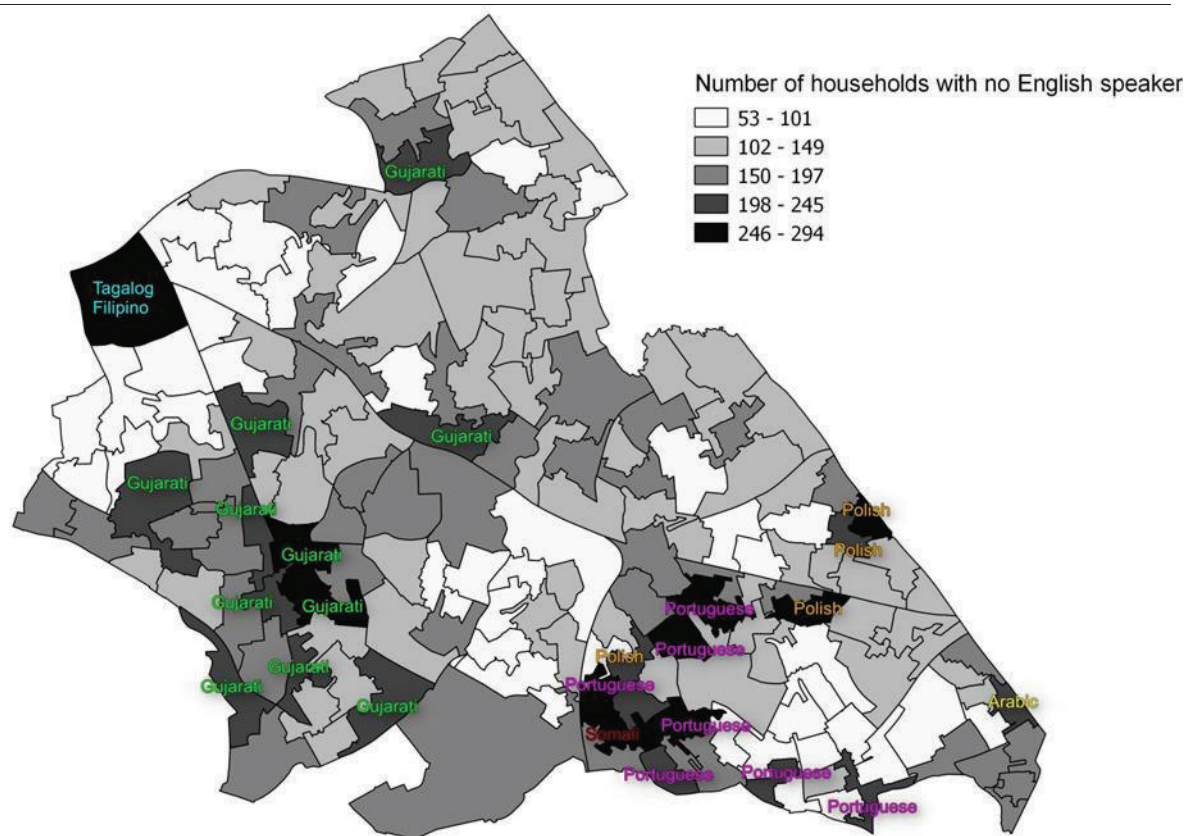
Language

The web currently has, and will continue to have a “translate” option so that everything on the website can be automatically translated into another language as listed by .

However, the 2011 census shows that In Brent there are 21,600 people aged 16 and over that cannot speak English well. This is 8.7% of the population. This reduces to 8.1% of the working age population (aged 16 to 64) and is 17,371. The map below shows the numbers of non-English speaking households by location - the darker the colour, the more households that do not speak English. The languages shown are the languages most spoken in that area after English.

The South of the Borough has a number of areas of non- English speaking households. The Library at Willesden Green will continue to provide face to face support as well as support for residents who wish to self serve. The Civic centre will offer assisted self service and face to face interviews for all residents. So face to face support will be available for communities who may face language barriers. For residents unable to travel to the Civic Centre a weekly face to face surgery will be provided as well as home visits for those who are very vulnerable of house bound.

Further, detailed customer research was undertaken at Harlesden during September 2014. Residents were asked if they would be able to use self service facilities if available. Most had access to the internet but a number of respondents indicated that they lacked confidence in using computers and would require assistance and support. This will be available at the Civic Centre through customer service staff and at Willesden through customer freephones.



Contains Ordnance Survey data © Crown copyright and database right 2014

Residents **with hearing and visual needs** will benefit from the web as all computers/phones (standard operating systems and browsers) allow with extra large font/text (which will assist people with visual impairments) and come with with sound/audio buttons (which will benefit residents with hearing impairment).

The **carers** (including family and friends) of older frail residents and of children and young people will benefit from transacting and finding out about services online. Many carers try to balance caring with work and careers. They will be able to access the Council 24:7.

This will reduce the need for frail and vulnerable residents from having to travel for assessments and appointments.

Gender Re-assigned residents, and also **physically and/or psychologically disabled residents** may face mobility constraints and may find the web more accessible and private.

Text Messages and Social Media

The Council will be able to target customers and send out information in the form of texts and also social media messages. This will particularly appeal to young people, as they communicate using these mediums. Texting for example will be used to remind people of appointments and may assist residents with memory challenges.

Social Media such as “Twitter” will be used along with text messages to target particular geographical areas for example, “X school will be closed today due to snow.”

Telephone

The Council will ensure that telephones are handled through a central Automated Call Distribution (ACD) system. Currently only 25% of incoming calls are on this system and mystery shopping has shown that for call handled outside the ACD up to 50% of calls are not answered or customers hang up. We do not yet have Management Information reports on non ACD calls but will have this when all incoming calls are routed through the ACD system. This will enable us to use the Management Information to continuously improve access and services.

The strategy does not reduce or change residents’ access to telephone contact channels to raise queries or access services. It aims to improve the current service and thus will be of benefit to all groups who chose to use this channel.

Face to Face (F2F)

Face to face services will be reconfigured to support the new access model , in particular providing much greater access to self service facilities and support to use these.

Computers for self-service and customer free phones will be available at both the Civic Centre and Willesden access points.

Face to face interviews for more complex enquiries and more vulnerable customers will be available at the Civic Centre from Monday to Friday 9.00am to 5.00 pm. Weekly surgeries will also be available at Willesden on an appointment basis for vulnerable customers who may find it difficult to travel to the Civic Centre. Home visits will be made to very vulnerable customers including those who are housebound.

Face to face arrangements are being reconfigured to ensure that a more personalised approach can be provided to those who are most vulnerable and have the most complex needs.

Please give details of the evidence you have used:

The benefits service launched a new online benefit applications available in August 2014. They did not publicise the new online option to enable a soft launch of this. However, within the first two weeks of the assessment form being available online, 50% of new claims were made online. Benefit claimants are economically disadvantaged, maybe vulnerable and some may not have English as their mother tongue.

Adult Social Care made clear during the CAS Workshops held on the 1st and 2nd September that many Carers choose to transact online and expect to have assessment forms and information about care and services online. This reflects the fact that caring responsibilities can make it more difficult to raise enquiries face to face or via the phone.

Recent analysis of Brent demographics (Mosaic Data 2014) reported that 76% of Brent's residents have access to smart phones and/or computers so are able to do things online. Further, the Mosaic data identified that 76% of Brent residents are independent and therefore are able to self-serve and prefer to do work online.

A focus group was held with BHP residents in June 2014 – these residents stated that what was most important to them was a responsive and prompt resolution of their enquiry. There was a receptiveness to use on line services where these were easy and intuitive to use but also a strong feeling that they wanted to be able to speak to a knowledgeable council officer who could resolve their enquiry, when it was not possible to do so on line.

4. Describe how the policy will impact on the Council's duty to have due regard to the need to:

(a) Eliminate discrimination (including indirect discrimination), harassment and victimisation;

Based on demographic analysis of Brent (Mosaic) 76% of our residents will be able to go online and do things for themselves. Self-service should reduce/eliminate discrimination, harassment and victimisation.

Residents who are unable to work online will have access to tailored Face to face service and will also be able to contact the Council via the telephone.

(b) Advance equality of opportunity;

Residents will gain access to more equality of opportunity by using the web. They will be able to do things for themselves and the system will advise them of opportunities. For example, they will be able to sign up for “e-alerts” and the Council’s proposed web-portal will send messages about other services and discounts that may be of interest.

(c) Foster good relations

Customer satisfaction increases when residents are well-informed by the Council. The web portal will be intuitive and easy to use so residents will be able to find the information that they are searching for and will be able to complete transactions digitally. Brent will also offer e-alerts and text messages which remind residents of appointments with us. The London Borough of Hammemersmith and Fulham for example, found that customer satisfaction increased hugely with the introduction of e-alerts.

5. What engagement activity did you carry out as part of your assessment?

Please refer to stage 3 of the guidance.

Residents of Brent Housing Partnership (BHP) were actively consulted and engaged by Capita during June and July 2014.

i. Who did you engage with?

BHP tenants

Survey of customers visiting Harlesden Customer Services Centre (Sept 2014)

ii. What methods did you use?

Face to face forums

Survey

iii. What did you find out?

We found out that customers:

- (i) find it difficult to contact us by telephone, as the current mixed telephony systems do not work well.
- (ii) Are required to have a separate login and password for each service accessed on the Council website and they would like to have just one

- log-in and one password.
- (iii) Find the current website “clunky” and difficult to use. Web searches were said to be difficult and pdf forms appear on the web site. Residents would prefer to transact digitally rather than have to print a pdf form.
 - (iv) Customers using on line services for the first time lack confidence in using these and would initially need support and assistance to do so

iv. How have you used the information gathered?

v. The information has been used to inform :

- (i) The Customer Access Strategy
- (ii) The specification of the proposed Web Portal
- (iii) The plan to ensure that all telephone calls from residents go via the ACD telephony system
- (iv) The proposed Face to Face offer at the Civic Centre and Willesden

vi. How has it affected your policy?

It has ensured that the Customer Access Strategy (the policy) has taken account of our diverse customers and communities.

6. Have you identified a negative impact on any protected group, or identified any unmet needs/requirements that affect specific protected groups? If so, explain what actions you have undertaken, including consideration of any alternative proposals, to lessen or mitigate against this impact.

Please refer to stage 2, 3 & 4 of the guidance.

We have identified a potential impact arising from the proposed changes to face to face access arrangements in Willesden. A more detailed impact assessment of these changes has been undertaken to evaluate the potential impact and identify mitigation to address this. Mitigation includes the provision of face to face surgeries at Willesden, home visits for very vulnerable customers, customer free phones located within the self service area and the provision of both assisted self service and face to face interviews at the larger Customer Services Centre at the Civic centre.

We have also identified potential benefits to meet unmet needs including:

(i) Approximately,50% of benefit claimants are in work and need to access services outside of their working hours and the web enables 24:7 access to services. (ii) Carers of frail older people and disabled people assist and/or lead on the assessments for care with agencies as they are the resident's main advocate. Adult Social Care have identified a trend which shows that carers prefer to transact online. Online assessments are not yet available in Brent. (iii) Residents complain of currently having too many log-ins and passwords when they use Brent's current on line services (iv) There is duplication across services as residents have to repeat information to each service that they interact with. The CAS will introduce a "Tell Us Once" approach and assessments will be streamlined. Further, verification processes will be streamlined. (v) Brent's website is not completely digital, for example pdf forms have to be printed. (vi) Language (vii) Age (viii) Disability
Please give details of the evidence you have used:

7. Analysis summary

Please tick boxes to summarise the findings of your analysis.

Appendix C1 provides a summary of the impact assessment for ach protected group.

Protected Group	Positive impact	Adverse impact	Neutral
Age	x		
Disability	x		
Gender re-assignment	x		
Marriage and civil partnership	x		
Pregnancy and maternity	x		
Race	x		
Religion or belief	x		
Sex	x		
Sexual orientation	x		

8. The Findings of your Analysis

Please complete whichever of the following sections is appropriate (one only).
Please refer to stage 4 of the guidance.

No major change

The Customer Access Strategy (CAS) will enhance and improve access. The different access channels target protected groups.

All of our customers will be able to contact us by any of the three channels:

- (i) Web
- (iii) Telephone
- (v) Face to face
- (vi) Post and email

And we will be able to contact residents via telephone, text messages and social media

The Web

The web will offer new and therefore more opportunities for protected groups.

The web currently has, and will continue to have a “translate” option so that

everything on the website can be automatically translated into another language.

Customers with hearing and visual needs will benefit from the web as all computers/phones (standard operating systems and browsers) allow with extra large font/text (visual impairment) and with sound/audio (Visual impairment).

The carers (including family and friends) of older frail residents will benefit from transacting and finding out about services online. Many carers try to balance caring with work and careers. They will be able to access the Council 24:7.

This will reduce the need for frail and vulnerable residents from having to travel for assessments and appointments.

Pregnant residents and residents with dependents will find the web more accessible and available at times which suit them.

Text Messages and Social Media

The Council will be able to target customers and send out information in the form of texts and also social media messages. This will particularly appeal to young people, as they communicate using these mediums. Texting for example will be used to remind people of appointments and may assist residents with memory challenges.

Social Media such as "Twitter" will be used along with text messages to target particular geographical areas for example, "X school will be closed today due to snow."

Telephone

The Council will ensure that telephones are on the Automated Call Distribution (ACD) system. Currently 75% of incoming calls are not on this system and in some areas 60% of calls are not answered or customers hang up. We do not have Management Information reports on 75% of calls but will have this when all incoming calls are routed through the ACD system. This will enable us to use the MI to continuously improve access and services.

Face to Face (F2F)

Face to face services will be available at The Civic Centre and in Willesden.

There will be a focus upon assisted self service so that customers are supported and learn how to use the internet. Computers for self-service will be available at both F2F Centres. Appointments with staff will also be available

F2F will benefit residents with complex needs. We have identified unmet needs which will be met by the CAS including:

- (i) 80% of benefit claimants are in work and need to access services outside of

their working hours and the web enables 24:7 access to services.

(ii) Carers of frail older people and disabled people assist and/or lead on the assessments for care with agencies as they are the resident's main advocate. Adult Social Care have identified a trend which shows that carers prefer to transact online. Online assessments are not yet available in Brent.

(iii) Residents complain of currently having too many log-ins and passwords

(iv) There is duplication across services as residents have to repeat information to each service that they interact with. The CAS will introduce a "Tell Us Once" approach and assessments will be streamlined. Further, verification processes will be streamlined.

Brent's current website is not completely digital, for example pdf forms have to be printed.

We found out that customers:

- (i) find it difficult to contact us by telephone, as the current mixed telephony systems do not work well.
- (ii) Are required to have a separate login and password for each service accessed on the Council website and they would like to have just one log-in and one password.
- (v) Find the current website "clunky" and difficult to use. Web searches were said to be difficult and pdf forms appear on the web site. Residents would prefer to transact digitally rather than have to print a pdf form.

The CAS will address this.

Adjust the policy

This may involve making changes to the policy to remove barriers or to better advance equality. It can mean introducing measures to mitigate the potential adverse effect on a particular protected group(s).

Remember that it is lawful under the Equality Act to treat people differently in some circumstances, where there is a need for it. It is both lawful and a requirement of the public sector equality duty to consider if there is a need to treat disabled people differently, including more favourable treatment where necessary.

If you have identified mitigating measures that would remove a negative impact, please detail those measures below.

Please document below the reasons for your conclusion, the information that you used to make this decision and how you plan to adjust the policy.

Continue the policy

This means adopting your proposals, despite any adverse effect or missed opportunities to advance equality, provided you have satisfied yourself that it does not amount to unlawfully discrimination, either direct or indirect discrimination.

In cases where you believe discrimination is not unlawful because it is objectively justified, it is particularly important that you record what the objective justification is for continuing the policy, and how you reached this decision.

Explain the countervailing factors that outweigh any adverse effects on equality as set out above:

Please document below the reasons for your conclusion and the information that you used to make this decision:

Stop and remove the policy

If there are adverse effects that are not justified and cannot be mitigated, and if the policy is not justified by countervailing factors, you should consider stopping the policy altogether. If a policy shows unlawful discrimination it must be removed or changed.

Please document below the reasons for your conclusion and the information that you used to make this decision.

9. Monitoring and review

Please provide details of how you intend to monitor the policy in the future. Please refer to stage 7 of the guidance.

There will be regular engagement with residents including forums;
Continuous customer feedback surveys for the web, telephone and F2F access points.

10. Action plan and outcomes

At Brent, we want to make sure that our equality monitoring and analysis results in positive outcomes for our colleagues and customers.

Use the table below to record any actions we plan to take to address inequality, barriers or opportunities identified in this analysis.

Action	By when	Lead officer	Desired outcome	Date completed	Actual outcome
		Amit Joshi	Portal available, single log-in	Dec 2014-June 2016	
		Phil Porter	Rationalised Online Assessments		
		Amit Joshi	AA web accessibility compliance	Dec 2014-June 2016	
		David Oates	Protected groups are not adversely	September 2015	

			impacted by changes to face to face access arrangements		
		Paula Buckley	Residents can easily access services and information on line and assistance is available to support them to use this where needed	At each phase of the implementation of the web portal	

Please forward to the Corporate Diversity Team for auditing.

Introduction

The aim of this guidance is to support the Equality Analysis (EA) process and to ensure that Brent Council meets its legal obligations under the Equality Act 2010. Before undertaking the analysis there are three key things to remember:

- It is very important to keep detailed records of every aspect of the process. In particular you must be able to show a clear link between all of your decisions and recommendations and the evidence you have gathered.
- There are other people in the council and in your own department who have done this before and can offer help and support.
- The Diversity and Consultation teams are there to advise you.

The Equality Act 2010

As a Public Authority, Brent Council is required to comply with the Public Sector Equality Duty (PSED) contained in the Equality Act 2010. These duties require Brent Council to have 'due regard' to the need to

- Eliminate discrimination, be it direct or indirect discrimination
- Advance equality of opportunity between persons who share a relevant protected characteristic and others who do not share it; and
- Foster good relations between people who share a protected characteristic and those who do not share it

The equality duty covers:

- Age
- Disability
- Gender reassignment
- Pregnancy and maternity
- Marriage and civil partnership (direct discrimination only)
- Race
- Religion or belief
- Sex (formally known as gender)
- Sexual orientation

What is equality analysis?

Equality Analysis is core to policy development and decision making and is an essential tool in providing good services. Its purpose is to allow the decision maker to answer two main questions.

- Could the policy have a negative impact on one or more protected groups and therefore create or increase existing inequalities?
- Could the policy have a positive impact on one or more protected groups by reducing or eliminating existing or anticipated inequalities?

What should be analysed?

Due consideration of the need for an Equality Analysis should be addressed in relation to all policies, practices, projects, activities and decisions, existing and new. There will be some which have no equalities considerations, but many will. Where an EA is undertaken, some policies are considered a higher risk than others and will require more time and resources because of their significance. This would include:

- Policies affecting a vulnerable group such as young people, the elderly and people with a disability
- Policies related to elective services such as Sports Centres or Libraries
- High profile services
- Policies involving the withdrawal of services
- Policies involving significant reductions in funding or services
- Policies that affect large groups of people
- Policies that relate to politically sensitive issues

It can sometimes be difficult to identify which policies are more sensitive. If you are in doubt seek advice from a more senior officer or the Diversity Team.

When should equality analysis be done?

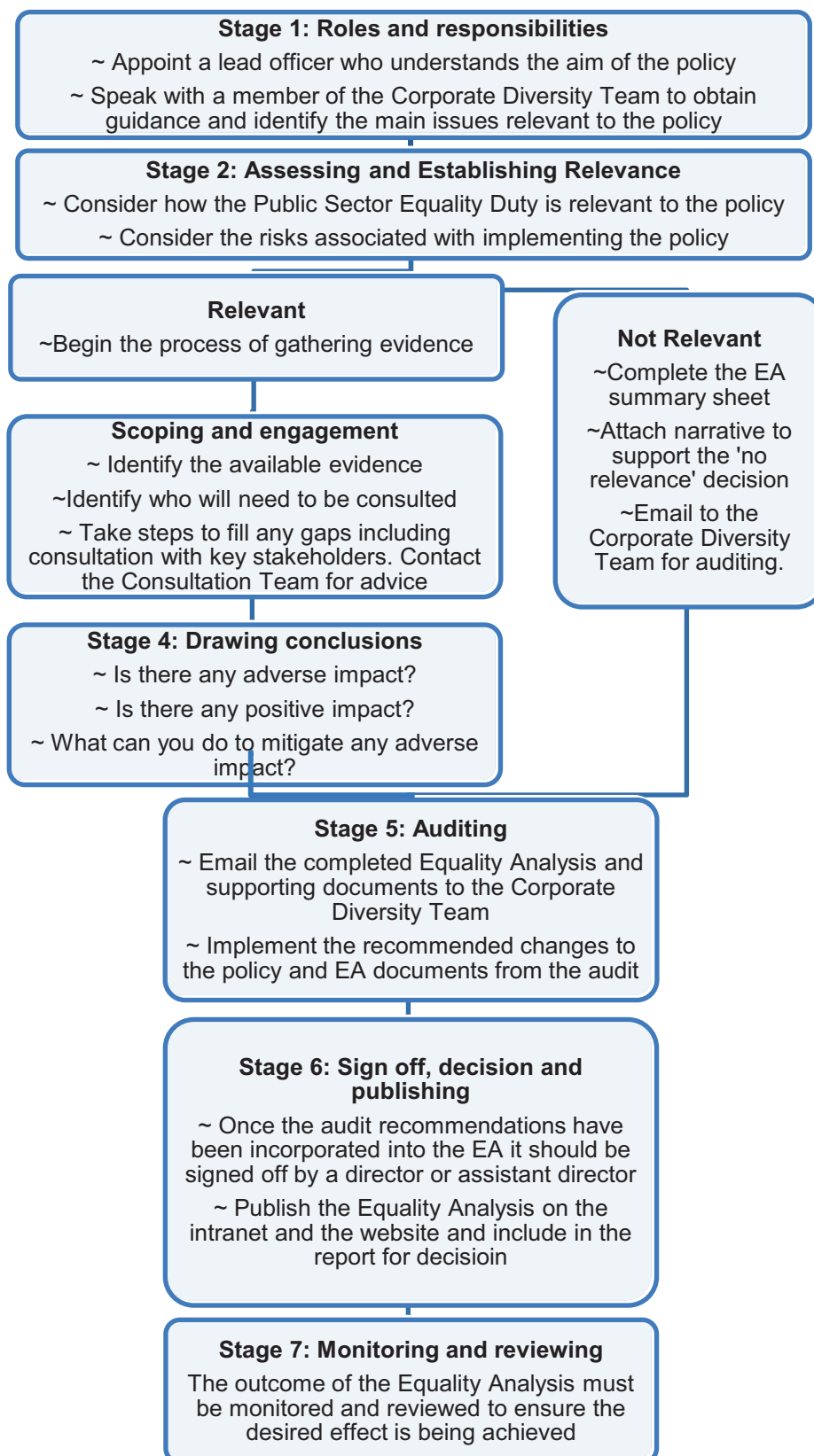
The EA must be completed before the policy is sent to the decision maker but should be carried out at the earliest possible stage. The advantage of starting early is that the equalities data informs and shapes the policy as it develops and progresses and this allows more time to address issues of inequality. You should also bear in mind that several changes may be happening at the same time. This would mean ensuring that there is sufficient relevant information to understand the cumulative effect of all of these decisions.

Positive action

Not all policies can be expected to benefit all groups equally, particularly if they are targeted at addressing particular problems affecting one protected group. (An example would be a policy to improve the access of learning disabled women to cancer screening services.) Policies like this, that are specifically designed to advance equality, will, however, also need to be analysed for their effect on equality across all the protected groups.

Brent Council's Equality Analysis Process

This flow chart sets out the process for carrying out an EA. Details on each stage of the process follow. Please note that it may be necessary to consult the Corporate Diversity team at each stage and that Legal may also need to be involved. This should be factored in to the time scale.



Stage 1: Roles and Responsibilities

The first stage in the process is to allocate the following roles.

Role	Responsibilities and tasks
Decision maker - the person or group making the policy decision (e.g. CMT/Executive/Chief Officer).	• Check that the analysis has been carried out thoroughly: • Read and be familiar with the EA and any issues arising from it and know, understand and apply the PSED. (The evidence on which recommendations are based must be available to this person.) • Take account of any countervailing factors e.g. budgetary and practical constraints
The officer undertaking the EA	• Contact the Corporate Diversity and Consultation teams for support and advice • Develop an action plan for the analysis • Carry out research, consultation and engagement if required • Develop recommendations based on the analysis • Submit the EA form to the Diversity team for audit with the evidence and any other relevant documents including the report the EA will be attached to • Incorporate the recommendations of the audit • Include the Equalities Analysis in papers for decision-makers
The Corporate Diversity Team. Usually an individual officer will be assigned at the start of the process	• Provide support and advice to the responsible officer • Carry out the audit of the EA to monitor quality standards and ensure it is sufficiently rigorous to meet the general and public sector duties. • Return the analysis to the responsible officer for further work if it fails to meet the necessary standard • Consult Legal if necessary (this stage of the process will take at least 5 days)
The council officer responsible for signing off the EA. Usually a senior manager within the relevant directorate	Ensure: • That the EA form is completed • That any issues raised as part of the auditing process have been fully dealt with • That the EA, the evidence used and any issues arising from the analysis are brought to the attention of the decision maker • Ensure that the findings are used to inform service planning and wider policy development.

Stage 2: Assessing and Establishing Relevance

We need to ensure that all of our policies and key decisions, both current and proposed, have given appropriate consideration to equality. Consideration of the need for an EA needs to be given to all new policies, all revised policies, all key decisions and changes to service delivery need an EA. Those that are more relevant will require more resources and data.

The following questions can help you to determine the degree of relevance, but this is not an exhaustive list:

Key Questions:

- Does the policy have a significant effect in terms of equality on service users, employees or the wider community? Remember that relevance of a policy will depend not only on the number of those affected but also by the significance of the effect on them.
- Is it a major policy, significantly affecting how functions are delivered in terms of equality?
- Will it have a significant effect on how other organisations operate in terms of equality?
- Does the policy relate to functions that previous engagement has identified as being important to particular protected groups?
- Does or could the policy affect different protected groups differently?
- Does it relate to an area with known inequalities (for example, access to public transport for disabled people, racist/homophobic bullying in schools)?
- Does it relate to an area where equality objectives have been set by Brent Council?

If the answer to any of the above is “yes”, you will need to carry out an Equalities Analysis.

“Not relevant”

If you decide that a policy does not impact on any of the equality needs contained in the public sector equality duty, you will need to:

- Document your decision, including the reasons and the information that you used to reach this conclusion. **A simple statement of no relevance to equality without any supporting information is not sufficient, nor is a statement that no information is available.** This could leave you vulnerable to legal challenge so obtaining early advice from the Corporate Diversity team would be helpful.
- Complete the EA Form and send it to the Corporate Diversity Team for auditing. If the Corporate Diversity Team advises that policy is relevant then you will need to continue the EA process (See flowchart). If the Corporate Diversity Team advises that the policy is not relevant then you will need to have it signed off, publish it and put in place monitoring arrangements for the policy.

Stage 3: Scoping

Scoping establishes the focus for the EA and involves carrying out the following steps:

- Identify how the aims of the policy relate to equality and which aspects have particular importance to equality.
- Identify which protected groups and which parts of the general equality duty the policy will, or is likely to, affect.
- Identify what evidence is available for the analysis, what the information gaps are, and establish which stakeholders can usefully be engaged to support the analysis.

Think about:

- The purpose of the policy, and any changes from any existing policy
- The reason for the policy
- The context
- The beneficiaries
- The intended results

At this early stage you should start to think about potential effects on protected groups. This could mean that you decide to change your overall policy aims or particular aspects of the policy in order to take better account of equality considerations. It is often easier to do this at an earlier stage rather than having to reconsider later on in the process.

Sources of information

It is important to have as much up-to-date and reliable information as possible about the different groups likely to be affected by the existing or proposed policy. The information needed will depend on the nature of the existing or proposed policy, but it will probably include many of the items listed below:

- The Brent Borough profile for demographic data and other statistics
- Census findings; the 2011 census data will be available during 2012
- Equality monitoring data for staff and/or service users
- Reports and recommendations from inspections or audits conducted on service areas
- Previous reports that have been produced either on a similar topic or relating to the same service user group
- Responses to public enquiries on similar topics e.g. Freedom of Information requests
- Comparisons with similar policies in other departments or authorities to help you identify relevant equality issues.
- Analysis of enquiries or complaints from the public to help you understand the needs or experiences of different groups.
- Recent research from a range of national, regional and local sources to help you identify relevant equality issues.
- Results of engagement activities or surveys to help you understand the needs or experiences of different groups.

- Local press and other media. This will tell you whether there is public concern about possible equalities implications and help you to highlight issues for engagement

Many of these sources will be consulted as a matter of course when reviewing or developing a policy. Equalities considerations are one part of the policy process, not an extra.

Service user information

The type of information you need will depend on the nature of the policy. However, information relating to service users is usually essential. Consider:

- The full range of information that you already have about the user group e.g. information contained within service reviews, audit reports, performance reviews, consultation reports
- Who actually uses the service?
- When do they use it?
- How do they use it and what are their experiences?
- Are there alternative sources of provision that could be accessed?
- Who will be using the service in the future?
- Information from groups or agencies who deliver similar services to your target group e.g. survey results from voluntary and community organisations.

Identify your information gaps

If you do not have equality information relating to a particular policy or about some protected groups, you will need to take steps to fill in your information gaps. This could mean doing further research, undertaking a short study, conducting a one off survey or consultation exercise, holding a focus group etc.

Engagement

The Consultation team are available to advise on all aspects of engagement. You may wish to carry out engagement, which can help you to:

- Gather the views, experiences and ideas of those who are, or will be, affected by your decisions.
- Base your policy on evidence rather than on assumptions
- Check out your ideas
- Find solutions to problems and develop ways to overcome barriers faced by particular groups.
- Design more appropriate services,
- Monitor and evaluate the success of your policies and understand where improvements may be necessary.
- Avoid the costs of remedying and adapting services after their implementation
- Pre-empt complaints, which can be costly and time-consuming.

But remember you don't always have to consult or embark upon engagement if you already have enough information to assess the likely impact of the policy change on the equality needs, and if there is no other legal duty to consult. This engagement

can form part of the broader consultation being carried out around service changes. You can also use recent engagement and research activities as a starting point, for example on a related policy or strategy and you can use documentation resulting from other equality analysis that Brent Council (or others) have undertaken.

For your engagement to be effective you will need to:

- Think carefully about who you should engage with. You will need to prioritise those who are most likely to be affected by the policy and those who will experience the greatest impact in terms of equality and good relations.
- In regard to people with a disability, as good practice it is recommended that they should be actively involved in engagement activity which directly affects them or the services that they receive.
- Make sure that the level of engagement is appropriate to the significance of the policy and its impact on equality
- Consider what questions you will need to ask, in order to understand the effect of the policy on equality. If you find it difficult to frame suitable questions you may take advice from the Corporate Diversity and Consultation teams
- Link into existing forums or community groups or to speak with representatives to help you reach less visible groups or those you have not engaged with before.
- Create opportunities for people to participate in supportive and safe environments where they feel their privacy will be protected, or via technology such as the internet
- Think of strategies that address barriers to engagement. Other people in the council have experience of this and can advise, as can the Corporate Diversity team and the Consultation team.

Stage 4: Drawing conclusions

You will need to review all of the information you have gathered in order to make a judgement about what the likely effect of the policy will be on equality, and whether you need to make any changes to the policy.

You may find it useful to ask yourself “What does the evidence (data, consultation outcomes etc.) tell me about the following questions”:

- Could the policy outcomes differ between protected groups? If so, is that consistent with the policy aims?
- Is there different take-up of services by different groups?
- Could the policy affect different groups disproportionately?
- Does the policy miss opportunities to advance equality and foster good relations, including, for example, participation in public life?
- Could the policy disadvantage people from a particular group?
- Could any part of the policy discriminate unlawfully?
- Are there other policies that need to change to support the effectiveness of the policy under consideration?

If the answer to any of the above is "yes", you should consider what you can do to mitigate any harmful effects. Advice from the Diversity team will be particularly helpful at this stage.

You will also want to identify positive aspects of the policy by asking yourself:

- Does the policy deliver practical benefits for protected groups?
- Does the policy enable positive action to take place?
- Does the policy help to foster good relations between groups

Having considered the potential or actual effect of your policy on equality, you should be in a position to make an informed judgement about what should be done with your policy.

There are four main steps that you can take:

- **No major change**
- **Adjust the policy**
- **Continue the policy**
- **Stop and remove the policy**

(please see EA form for detailed descriptions of each decision)

Decisions may involve careful balancing between different interests, based on your evidence and engagement. For example, if the analysis suggests the needs of two groups are in conflict, you will need to find an appropriate balance for these groups and for the policy in question. The key point is to make sure the conclusions you reach can be explained and justified. Speak to the Diversity team if you are unsure. As a result of your analysis you may need to develop new equality objectives and targets. These should be documented on the EA form.

Stage 5: Auditing

Once you have completed the EA you will need to complete the EA Form and send it to the Corporate Diversity Team for auditing. It is important to ensure that the EA Form is completed as fully as possible. Documenting all of your analysis is important to ensure that you can show how the general and specific duties are being met. This aspect of the analysis has been subject to legal challenge so you need to be able to show how you reached your conclusions. The audit process involves the Corporate Diversity Team reviewing the completed form, the information and evidence. Sometimes this may require advice from Legal. You need to bear in mind that this will take at least five days. The team will send you back a feedback form with comments and recommendations which you will need to action prior to the sign off of the form.

Stage 6: Sign Off, Decision and Publishing

Once the EA Form is completed, the document must be signed off and the completed document must be sent to the Corporate Diversity Team to be published on the council website.

Decision-making

In order to have due regard to the aims of the public sector equality duty, decision-making must be based on a clear understanding of the effects on equality. This means that Directors, CMT and others who ultimately decide on the policy are fully aware of the findings of the EA and have due regard to them in making decisions. They are also entitled to take into account countervailing factors such as budgetary and practical constraints.

Stage 7: Monitoring and Reviewing

Your EA, and any engagement associated with it, will have helped you to anticipate and address the policy's likely effects on different groups. However, the actual effect of the policy will only be known once it has been introduced. You may find that you need to revise the policy if, for instance:

- Negative effects do occur
- Area demographics change, leading to different needs,
- Alternative provision becomes available
- New options to reduce an adverse effect become apparent

You will need to identify a date when the policy will be reviewed to check whether or not it is having its intended effects. This does not mean repeating the EA, but using the experience gained through implementation to check the findings and to make any necessary adjustments. Consider:

- How you will measure the effects of the policy?
- When the policy will be reviewed (usually after a year) and what could trigger an early revision (see above)?
- Who will be responsible for monitoring and review?
- What type of information is needed for monitoring and how often it will be analysed?
- How to engage stakeholders in implementation, monitoring and review?

Section 3: Glossary

Civil partnership: Legal recognition of a same-sex couple's relationship. Civil partners must be treated the same as married couples on a range of legal matters.

Direct discrimination: This refers to less favourable treatment of one individual, if, because of that person's protected characteristic, that person is treated less favourably than another. Direct discrimination cannot be justified unless it is discrimination on the grounds of age.

Disability: A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities.

Equality information: The information that you have (or that you will collect) about people with protected characteristics that will help you to show compliance with the equality duty. This may include the findings of engagement with protected groups and others and evidence about the effect of your policies on protected groups. It includes both qualitative and quantitative information, as well as evidence of analysis you have undertaken.

Gender reassignment: This is the process of transitioning from one sex to another. See also trans, transgender, transsexual.

Harassment: Unwanted conduct related to a protected characteristic that has the purpose or effect of violating a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment. It may also involve unwanted conduct of a sexual nature or be related to gender reassignment or sex.

Indirect discrimination: This is when a neutral provision, criterion or practice is applied to everyone, but which is applied in a way that creates disproportionate disadvantage for persons with a protected characteristic as compared to those who do not share that characteristic, and cannot be shown as being a proportionate means of achieving a legitimate aim.

Mitigation: This is when measures are put in place that lessen the negative effects of a policy or policies on protected groups.

Objective justification: Your provision may indirectly discriminate against a particular group if:

- It is a proportionate means to achieve a legitimate end
- The discrimination is significantly outweighed by the benefits
- There is no reasonable alternative to achieve the legitimate end

For example, some employers have policies that link pay and benefits to an employee's length of service, such as additional holiday entitlement for long-serving employees. This may indirectly discriminate against younger people who are less likely to have been employed for that length of time, but in most circumstances it is seen as being a proportionate way of encouraging staff loyalty.

Direct discrimination on the grounds of age can also be objectively justified (no other direct discrimination can be).

Positive action: Lawful actions that seeks to overcome or minimise disadvantages that people who share a protected characteristic have experienced, or to meet their different needs (for example, providing mentoring to encourage staff from under-represented groups to apply for promotion).

Pregnancy and Maternity: Pregnancy is the condition of being pregnant. Maternity is the period after giving birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, including as a result of breastfeeding.

Proportionality: The weight given to equality should be proportionate to its relevance to a particular function. This may mean giving greater consideration and resources to functions or policies that have the most effect on the public or on employees.

Race: This refers to a group of people defined by their colour, nationality (including citizenship), ethnic or national origins.

Reasonable adjustment: Public authorities making adjustments to the way in which they carry out their functions so that disabled people are not disadvantaged by the way in which those functions are carried out. This is with regard to policies, practices or procedures, premises, and the provision of auxiliary aids or services.

Relevance: How far a function or policy affects people, as members of the public, and as employees of the authority. Some functions may be more relevant to some protected groups than to others, and to one or more of the three elements of the general equality duty. The function or policy may still be relevant if the numbers affected by it are very small.

Religion or belief: Religion means any religion, including a reference to a lack of religion. Belief includes religious and philosophical beliefs including lack of belief (for example, Atheism). Generally, a belief should affect your life choices or the way you live for it to be included.

Sexual orientation: This is whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.

Trans: The terms 'trans people' and 'transgender people' are both often used as umbrella terms for people whose gender identity and/or gender expression differs from their birth sex, including transsexual people (those who propose to undergo, are undergoing or have undergone a process of gender reassignment to live permanently in their acquired gender), transvestite/cross-dressing people (those who wear clothing traditionally associated with the other gender either occasionally or more regularly), androgyne/polygender people (those who have non-binary gender identities and do not identify as male or female), and others who define as gender variant.

Transgender: An umbrella term for people whose gender identity and/or gender expression differs from their birth sex. They may or may not seek to undergo gender reassignment hormonal treatment/surgery. Often used interchangeably with trans.

Transsexual: A person who intends to undergo, is undergoing or has undergone gender reassignment (which may or may not involve hormone therapy or surgery). Transsexual people feel the deep conviction to present themselves in the appearance of the opposite sex. They may change their name and identity to live in the preferred gender. Some take hormones and have cosmetic treatments to alter their appearance and physical characteristics. Some undergo surgery to change their bodies to approximate more closely to their preferred gender. Transsexual people have the protected characteristic of gender reassignment under the Equality Act 2010. Under the Act, gender reassignment is a personal process rather than a medical one and it does not require someone to undergo medical treatment in order to be protected.

Victimisation: Subjecting a person to a detriment because they have made a complaint of discrimination, or are thought to have done so; or because they have supported someone else who has made a complaint of discrimination. Victimisation is unlawful under the Equality Act 2010.

A Summary of the Equality Act 2010

The Equality Act 2010 replaces the existing anti-discrimination laws with a single Act. The legislation covers:

- Employment and work
- Goods and services
- The exercise of public functions
- Premises
- Associations
- Transport
- Education

The act prohibits:

- Direct discrimination
- Indirect discrimination
- Discrimination by association
- Discrimination by perception
- Discrimination arising from disability
- Victimisation
- Harassment

The new legislation no longer refers to 'diversity strands' instead it introduces the concept of 'protected characteristics or groups, the protected characteristics are:

- Age
- Disability
- Gender reassignment
- Race
- Religion or belief
- Sex
- Sexual orientation
- Marriage and civil partnership
- Pregnancy and maternity

The Public Sector Equality Duty

The public sector equality duty requires that 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.

These are generally referred to as the three arms of the duty. In relation to 'fostering' there is a duty to have due regard to the need to tackle prejudice and promote understanding.

Equality of opportunity is expanded by placing a duty on the Council to have due regard to the need to:

- Remove or minimize disadvantages connected to a characteristic of a protected group.
- Take steps to meet the needs of protected groups.
- Encourage participation of protected groups in public life where participation is proportionately low.

There is also a specific requirement that councils must take steps to take account of a person's disability and there is a duty to make reasonable adjustments to remove barriers for disabled people. The duty is 'anticipatory'. For example, Brent Council cannot wait until a disabled person wants to use its services, but must think in advance (and on an ongoing basis) about what people with a range of impairments might reasonably need.

BCS Redesign - Equality Impact Assessment

Protected Characteristic	Potential Adverse Impact	Potential Positive Impact	Mitigating Action (if adverse impact identified)	Data used	Data Source	Notes
Age	Ability to use IT; difficulty using IT and traveling due to disability	Improved on-line service provisions (for those able to use IT); no need to travel to BCS offices	Shop floor support; telephone service available in self-service areas; option to make appointment with BCS (face to face) in CC or Willesden Library (weekly surgery)	The percentage of people that have never accessed the internet and have a disability increases as the age groups get older - 60+ make up 70% of those that had never used the internet, 4.2% for 16-64	The Annual Population Survey 2013 - GLA/ONS (Business Intelligence Team report); BCS data extracted from Business Objects/Client Index	
Disability	Difficulty using IT and traveling due to disability	Improved on-line service provisions (for those able to use IT);The new web portal will be "AA compliant" . This is the global standard for disability access. Further, all computers have a enlarged text button which may benefit people with visual impairment. People with hearing impairments may have difficulty using the telephone or with hearing staff in a face to face setting. However, if IT literate, they are unlikely to face barriers when accessing the internet. No need to travel to BCS offices	All digital offers (including commissioned online offers) will comply with AA standards to increase accessibility for disabled people with a wide range of impairments. Option to make appointment with BCS (face to face) in CC or Willesden Library (once a week surgery); Independent Travel Team can assess for concessionary travel assistance	13.6% BCS (Benefits) customers have a disability or long term illness	BCS data extracted from Business Objects/Client Index	
Ethnicity	Residents who are unable to speak, read or write to an adequate level of English to complete forms independently who would need either support or translation services to use both face-to-face and digital channels. Also some cultural differences could impact on the ability of people from some ethnic groups to take advantage of all online services or the types of needs they have from the digital offer – this would be treated in more detail in the EIAs for changes to specific service offers (for example, around handling money or bereavement).	As people become more confident in using the internet, they may wish to use the web to keep in touch with events in their birth country. They may choose to use Skype which allows free telephone-like conversations , anywhere in the world.	All computers have a "translate button" so residents will be able to choose from a menu of languages when using the internet. We will publicise this option. We will work with local community groups and help them to support residents with English language difficulties, we will also work with Libraries and BACES to provide/promote language and IT skills courses . provision of interpreters.	8.7% of Brent population age 16+ does not speak English (well enough); 38% of Harlesden BCS customers who cannot speak English brought someone with them to assist	2011 Census, BCS Harlesden - Survey Monkey (ongoing)	No evidence of significant discrepancies in Internet use amongst different ethnic groups (The Annual Population Survey - GLA/ONS); population that does not speak English mainly speakers of Portuguese, Gujarati, Polish, Somalian and Tagalog/Filipino

Sex	None	The potential positive impact identified for pregnancy and maternity is also relevant to sex, as women are more likely to have childcare responsibilities than men.	N/A	None	None	
Religion/Belief	None	None	N/A	N/A	N/A	
Sexual Orientation	None	None	N/A	N/A	N/A	
Relationship Status	None	None	N/A	N/A	N/A	
Pregnancy and Maternity	None	Improved (24 hours) on-line service provisions (for those able to use IT); no need to travel to BCS offices	N/A	None	None	
Gender Reassignment	None	people may be able to access services and provide sensitive information in a more confidential and private way without fear of discrimination or mistreatment from officers.	N/A	Trans people fear for their safety, to the extent that those not yet living permanently in their new role do not go out into public spaces in their preferred gender. 73% of respondents experienced harassment, with 10% being victims of threatening behaviour when out in public spaces.	Extract from the article "Engendered Penalties: Transgender and Transsexual People's Experiences of Inequality and Discrimination" (2007), written by academics from Manchester Metropolitan University for a research project and report commissioned by the Equalities Review	
Sexual Orientation	None	people may be able to access services and provide sensitive information in a more confidential and private way without fear of discrimination or mistreatment from officers.	N/A	None	None	
Religion/Belief	Some Orthodox Jewish people who won't use the internet . In addition to those who live in the borough, a number of school children from the Orthodox Jewish community attend schools in the borough	None	telephone service available in self-service areas; option to make appointment with BCS (face to face) in CC or Willesden Library (weekly surgery)	None	None	
Additional (non-protected) Characteristics						
Socio-Economic Factors	People who may have poor literacy . They are likely to be our heaviest users and will need the most support.	Improved on-line service provisions (for those able to use IT); no need to travel to BCS offices	Option to make appointment with BCS (face to face) in CC or Willesden Library (once a week surgery)	Mosaic data shows that all socio-economic groups have access to the internet; especially with the introduction of Smart phones. However, some people may have low literacy skills so we will continue to offer Face to Face and telephone contact. We will offer support and guidance in using the internet and we will continue to provide free wifi and access to computers within in our Customer Contact Centre at the Civic Centre and also at the Library in Willesden Green. 50% of new benefit claims in Brent were made online during August 2014.	The Annual Population Survey - GLA/ONS (Business Intelligence Team report)	

Caring Responsibilities	Travel cost, If requiring to visit BCS - may be higher for those living in the South of the Borough	Improved (24 hours) on-line service provisions (for those able to use IT); no need to travel to BCS offices	Option to make appointment with BCS (face to face) in CC or Willesden Library (once a week surgery)		Business Objects/Client Index	
Employment Status	Some residents may have to travel further to access 'face to face' services and make alternative caring arrangements	Improved (24 hours) on-line service provisions (for those able to use IT); no need to travel to BCS offices and/or take time off work	N/A	None	None	According to our own survey of customers visiting Harlesden BCS (Survey Monkey) 60% are in employment

*Residents with no/little English are likely to require equal assistance accessing 'face to face' service

**Based on available data and using North Circular Road as the border; NORTH - all 'HA' post codes and 'NW9'; SOUTH - all 'NW' and 'W' post codes

Other Comments/Observations

According to BCS Scorecard, In the last 6 months around 20% of Benefits and 8% of Council Tax queries were conducted 'face to face'. This data suggest that the majority of customers do not prefer to access services via 'face to face', choosing other channels instead

With the imminent introduction of RBV checks almost all BCS/customer interactions will be possible via channels other than 'face to face'. 62% all Benefits interactions in August 2014 (the only set of data available in BCS Scorecard) were related to actioning/resolving/assessing CICs

According to the Annual Population Survey 2013 - GLA/ONS (Business Intelligence Team report) 13.2% of 16+ residents have never used Internet. Yet, according to Mosaic only 0.3% of households have never used email. While Mosaic figure has to be treated with a caution, this may suggest that residents who never use Internet, co-habit with people who do and can provide assistance. Increase in on-line school application forms from around 50% to over 90% in 2012 supports this hypothesis.

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Cabinet
13 October 2014

Report from the Chief Finance Officer

Wards affected:
ALL

Budget strategy and financing update

1.0 Introduction

- 1.1 This report updates the Council's funding forecasts for the next four years. It takes account of anticipated spending pressures, whether driven by changes in legislation, demographic trends or local policy intentions and provides updated estimates of the financial impact of these. It also takes account of updated information on financing from central government and other sources, where this is available.
- 1.2 The report therefore provides an updated summary of the significant financial challenges that the council will need to meet over the next four years, with a particular emphasis on the years 2015/16 and 2016/17.
- 1.3 This report does not deal with proposed savings. It merely sets out the financial context against which savings will need to be considered as part of the normal budget making process.

2.0 Recommendations

- 2.1 To note the latest forecasts for the Council's financial position for 2015/16 to 2018/19.

3.0 Spending pressures

- 3.1 The council has been planning on the basis of a budget gap of £52.8m over the next two years. This was a planning assumption, and it is normal practice to update such assumptions annually, to reflect changed circumstances.
- 3.2 The council needs to reduce its total costs significantly in order to set an affordable budget. However, before reductions in costs can be considered it is essential to understand the various spending pressures that will also need to be managed as part of the budget process. These can be driven by changes to legislation, they can arise as a result of changing demographics within Brent and they can arise as a result of locally determined policy choices.

Legislative changes

- 3.3 The principal issue to consider here is the proposed changes to the regime for parking enforcement. The DCLG has consulted on a package of measures that it proposed would lead to better and/or fairer management of the parking service. Amongst other things these proposals, if adopted, would lead to banning the use of mobile CCTV cameras to enforce parking contraventions (except in certain highly specified circumstances) and applying mandatory grace (overstay) periods of 15 minutes for on street parking.
- 3.4 Brent enforces parking regulations to manage the flow of traffic on its highways. It recovers the cost of this from the payments for parking charges, and invests any surpluses made back into highway related expenditure, as defined in the Road Traffic Act 1984. The current estimate is that if the changes proposed by DCLG were implemented in full then the funds available for re-investment would be reduced by some £2.2m.
- 3.5 Brent has argued strongly that the proposed changes will not assist, but will instead hinder, the effective management of its highways and will risk increasing congestion and inconsiderate parking. However, in the event that the changes are adopted then the financial consequence of this need to be taken into account in the council's financial planning. As stated above, the present estimate is that this will add some £2.2m to the council's net costs, which if no other action were taken would be the equivalent of a council tax increase of nearly 3%.
- 3.6 In addition, another report on this agenda discusses the implications of a pilot for different parking enforcement policies for removal of illegally parked cars. This report, if agreed, is estimated to reduce the amount available for reinvestment from the parking account by £0.3m.
- 3.7 The Care Act is another significant factor. The principal changes that this will bring about in the care economy will be to limit the lifetime contributions that any individual can be required to make for the cost of their care and to create enhanced rights for carers, and payments that they can as a result receive.

- 3.8 It is more difficult to estimate the costs of this than it is for the proposed changes to parking discussed above. This is because the proposed changes to parking are about removing or existing enforcement methods, the service and financial consequences of which can be predicted based on previous experience. In the case of the Care Act a new requirement will be introduced for local authorities to cap the fees payable by any individual for their care at £72,000 in their lifetime and new responsibilities will be created to provide financial compensation to carers from April 2015. These are inherently harder to estimate.
- 3.9 At present Brent carries out financial assessments in line with national guidance, following which recipients of adult care services may be required to make a financial contribution to the cost of their care. It is difficult to assess how many residents currently contribute more than the proposed cap in the lifetime, as the data had to date not been collected in this format. There are further complications in the legislation that will mean that the “care account” for a resident is ‘portable’, so that the lifetime cap applies even if someone moves from one local authority to another. (i.e. that their total contributions to two or more authorities will not exceed the cap).
- 3.10 Taken together the impact of the Care Bill is currently estimated to be £1m in 2015/16. Costs will then rise significantly, perhaps to £9m by 2019/20 as residents hit the caps in their care accounts, but the impact of this is unlikely to be significant until 2017/18.

Demographic changes

- 3.11 Brent has a large and growing population, currently 317,000. Measured by numbers of residents it is the fifth largest borough in London and one of the most densely populated and most diverse. The borough has experienced growth of over four per cent in the past five years and continued growth at this rate will bring the population to 322,000 in the next four years. There are three main reasons for this increase: a comparatively high birth rate, net inward migration of working age adults and people living longer. This increase is putting increasing demands on all council services, but in particular housing, waste collection and social care.
- 3.12 There has been significant growth at both ends of the age spectrum; the number of residents aged under 10 years of age and aged over 65 years have each increased by more than 10 per cent in the past five years. The biggest population growth, however, has been in the over 80s; this group has increased by 24 per cent over the past five years. Population growth at both extremities of the age spectrum has very significant implications for public services – for example, the increase in numbers of under 10s requires additional school places and growth of the over 80s needs extra spending on care services.

- 3.13 A quarter of Brent's population is under 19 and of this age group 29 per cent are deemed to be living in poverty. The rapidly growing young population places extra demand on the children's social care services and costs for school places.
- 3.14 There is also an increasing demand on adult social care in Brent. This is driven by an increase in the over 80 year olds, declining health and deprivation. As people are living longer, they are experiencing more complex health conditions in later life. Mental ill health is the single largest cause of early death in Brent. Estimates show that in a given week, 11 per cent of Brent's adults experience depression, higher than the England average of 8 per cent. The number of people with a moderate/severe learning disability has grown 5 per cent between 2010 and 2015 and is predicted to grow 5 per cent between 2015 and 2020. The costs are often higher to support people with challenging behaviours. From April 2016, anyone born with a disability will not need to pay for any care and support. In the long-term this will create a significant budget demand on care services.
- 3.15 The council tracks demographics closely, as a means of understanding the population that it serves and the costs of so doing. As part of the budget strategy endorsed in October 2013 demographic led growth of £2.7m was set aside over 2015/16 and 2016/17 to cover the costs associated with this. However, the rate of demographic change has accelerated since then, as has our understanding of the population as more data sets are released from the 2011 census. At this stage it is considered prudent to increase the cost estimate for demographic pressures by £1.0m over the period to 2016/17.

Policy driven changes

- 3.16 As well as responding to the national legislative demands and redesigning services to meet changing demographics the council also needs to consider its own policy agenda, and in particular how it can shape the borough's economy in order to improve the lives of its residents. Managed effectively, policies in this area could also have the ancillary benefit of reducing the council's long-term costs, but the implementation and short run costs might be very significant.
- 3.17 A key policy in this area is the London Living Wage. This seeks to recognise the additional costs that flow from living in London, such as for housing in particular, and is therefore set above the level of the national minimum wage. Currently it is set at £8.80 and is reviewed annually. Such reviews have tended to increase the LLW at more than the rate of general inflation in recent years.
- 3.18 Brent pays all of its directly employed staff at least the LLW. It encourages suppliers to do the same, but cannot mandate them to do so, nor, by law, can it require it as a condition of winning council contracts. It can, however, ask bidders to price for the LLW in tenders as an alternative or variant bid, and then consider this in contract award.

- 3.19 A more detailed report will be brought back to Cabinet in due course on the implementation of the LLW. As it is a clearly expressed policy goal of the Administration it is appropriate to consider it as part of the council's budget strategy. The cost of implementing the policy is not a simple matter to calculate, depending as it does on assumptions about current wage levels in supply chains and the behaviour of contractors.
- 3.20 The initial estimates of the cost of implementing the LLW are in a broad range of £6m to £11m. Significant further work will be required to refine these initial estimates. As part of formal adoption of a policy aimed at making all of the council's contracts LLW compliant (to the extent that this is permissible by law) consideration would need to be given to the time period over which this was achieved. This would be consistent with the advice from the LLW Foundation, which endorses an approach of gradual implementation.
- 3.21 The council will need to recognise other unavoidable cost pressures as part of its budget strategy. These will include inflation (which is relatively low at present) where this is unavoidable and ensuring that adequate budgets are set aside to maintain and optimise the use of key assets, especially the Civic Centre.
- 3.22 The effects of these legislative and demographic and on the savings target are set out in Table 1, below. Policy driven changes are not shown in this table, because they cannot be quantified at this stage pending further financial assessment and formal adoption.

Table 1: Impact of legislative and demographic changes

	2015/16	2016/17	Total
	£m	£m	£m
Initial funding gap	33.0	19.8	52.8
Add, parking pressure	2.5	0	
Add, Care Bill pressure	1.0	0	
Funding gap after legislative changes	36.5	19.8	56.0
Add, demographic changes	0.5	0.5	
Funding gap after legislative changes	37.0	20.3	57.3

4.0 Updated financing assumptions 2015/16 to 2016/17

4.1 The Budget Strategy Update report to Executive on 14 October 2013 included a financial forecast for 2015/16 and 2016/17 which included the following funding assumptions:

- Revenue support grant of £66.9m in 2015/16 and £53.6m in 2016/17 (based on national funding announcements by the government during the summer of 2013);
- Council tax freeze grant in respect of 2014/15 would also be received in 2015/16;
- New Homes Bonus to be top-sliced by £400m nationally in 2015/16;
- Council tax base increase of 1% each year;
- Council tax collection of 96% for each year.

4.2 Forecasts for the four year period to 2017/18 have been produced to enable the Council to develop its medium term plan. However, officers do not anticipate any national funding allocations for 2016/17 onwards to be announced until after the next General Election. Figures in this report for 2016/17 and later years must therefore be treated with some significant caution.

Central Government Funding Announcements

4.3 The funding assumption for 2015/16 is based on the Local Government Finance Settlement figures produced by the Government in January 2014.

4.4 Figures for later years are based on modelling work undertaken by the Local Government Association and London Councils. The assumptions underpinning this are in turn based on key macro economic forecasts and other data, produced by organisations such as the Office for Budget Responsibility and Office for National Statistics. It is therefore clearly reasonable for Members to use this as a source of information for financial planning, but to be mindful of the inherent uncertainties in such data.

4.5 To set these funding estimates in context it is relevant to note that London Councils, the umbrella group representing London local government has recently commented that:

“London Councils believes the local government finance system is, in its current form, not sustainable. In the past two spending reviews, local government has been asked to deliver a significant proportion of public spending reductions (28% real terms reduction in Spending Review 2010 and 10% real terms reduction in Spending Round 2013 compared to just 6% and 3% respectively for all government departments).

London Councils' modelling suggests this will translate into a 60% real terms reduction in core funding to local government by 2018-19, compared with a real terms reduction of just 3% for the whole public sector over the same period."

- 4.6 Officers recommend using projections in the mid-range of those provided for the core elements of funding determined by central government, as set out in Table Two, below.

Table 2: Core Funding Projections

	2014/15 £'m	2015/16 £'m	2016/17 £'m	2017/18 £'m	2018/19 £'m
Revenue Support Grant	95.4	68.8	54.4	41.8	29.8
Business Rate Top-Up	47.4	48.8	50.5	52.5	54.5
2014/15 Council Tax Freeze Grant	1.1	1.1	1.1	1.1	1.1
Total	143.9	118.7	106.0	95.4	85.4
Total – October 2013	143.4	118.5	104.2	-	-
Funding Increase	+0.5	+0.2	+1.8	-	-

- 4.7 Business rates top up (BRTU) grant is assumed to increase with inflation. The LGA model assumes a reduction in the aggregate funding of this and RSG of 8% in 2016/17 and 7% in future years. As a result whereas RSG is currently about twice the level of BRTU by 2018/19 it will probably be about half.
- 4.8 The estimated total core funding for 2015/16 has increased by £0.2m compared to the forecast in October 2013. The figure for 2016/17 has increased by £1.8m.

Business Rates

- 4.9 Under the retention system introduced in April 2013 the Council retains 30% of business rates paid within Brent. Projections for future years are determined by estimates of:
- RPI inflation
 - Changes in number and rateable value of businesses
 - Outcome of appeals against rateable values
- 4.10 Based on the latest projections it is estimated that locally retained business rates will increase by 4.5% each year, although this will need to be carefully monitored as the backlog of appeals lodged with the Valuation Office Agency is cleared. The potential for significant adjustments to income resulting from appeals is one of the biggest funding risks the Council faces and means that estimates of the balance on the Collection Fund (covering both business rates and council tax) are uncertain.

- 4.11 The estimated retained business income for 2015/16 has decreased by £0.5m compared to the forecast in October 2013. The figure for 2016/17 has decreased by £0.7m. This reflects the actual rateable valuations within the London Designer Outlet and the impact of successful appeals.

Council Tax

- 4.12 Based on the latest information the council taxbase within Brent is higher than anticipated a year ago and this is projected to continue through to the next financial year.
- 4.13 The key issues driving this increase are:
- Number of properties within the borough
 - Value of council tax discounts awarded, particularly in respect of the council tax support scheme
- The latter point is particularly relevant as the council tax support scheme means that Council's council tax income is now affected by changes in employment levels within Brent.
- 4.14 The estimated council tax income, in both 2015/16 and 2016/17, has increased by £1.5m compared to the forecast in October 2013. This is a feature of the number of properties in the borough and their economic circumstances. The council tax levied by Brent Council has not changed for five years.
- 4.15 The increased taxbase, along with the in-year collection performance, feeds into the calculation of balance on the Collection Fund at the end of each financial year. This is then shared between the Council and Greater London Authority in the following year. The Collection Fund balance will be determined by the Cabinet in December in accordance with the statutory timeline for its calculation.

Other Funding

- 4.16 During 2013 the government recently announced proposals to top-slice £400m of New Homes Bonus funding nationally to be provided to Local Enterprise Partnerships. This has subsequently been revised to only impact on London, with £70m being deducted from the boroughs.
- 4.17 The latest projection for New Homes Bonus funding for the Council, reflecting the latest housing projections and the top-slice is that the Council will receive £5.0m in 2015/16, increasing to £6.0m in 2016/17.

5.0 Revenue finance position

- 5.1 The overall funding estimates outlined in this report are summarised in Table three, below. These figures do not assume any rise in the level of council tax.

Table 3: Overall Funding Projections

	2014/15 £'m	2015/16 £'m	2016/17 £'m	2017/18 £'m	2018/19 £'m
Core Funding	143.9	118.7	105.9	95.4	85.4
Business Rates	34.7	36.2	37.8	39.4	41.1
Council Tax Base	83.9	85.9	86.8	87.7	88.6
Collection Fund Surplus	2.5	0.0	0.0	0.0	0.0
New Homes Bonus	6.2	5.0	6.0	6.0	5.2
Total	271.1	245.8	236.5	228.5	220.3

- 5.2 The updated financial forecasts represent an increase in funding compared to those previously assumed for 2015/16 and 2016/17. The changes are set out in Table 4 below.

Table 4: Cumulative Changes in Funding Projections to 2016/17

	2015/16 £'m	2016/17 £'m
Revised savings gap, table one	37.0	20.3
Less, improvement in core funding	(0.2)	(1.8)
Add, worsening in business rates	0.5	0.7
Less, improvement in council tax base	(1.5)	(1.5)
Add, worsening in new homes bonus	0.0	0.4
Total	35.8	18.1

6.0 Capital Programme/Dedicated Schools Grant/Housing Revenue Account

- 6.1 In setting the budget last year the council did not extend its previously agreed capital programme, other than to recognise where new grants and other specific sources of funding had been allocated by funding agencies. On this basis the capital programme is summarised in Table five, below.

- 6.2 Extending the programme to 2018/19 will provide an opportunity to identify the Council's priorities for investment in infrastructure across the borough. However the challenging funding outlook means that there is limited scope for schemes that increase the burden on the council's revenue budget.

Table 5 – Forecast Capital Programme Summary

	2014/15	2015/16	2016/17
Service Area	£000	£000	£000
Expenditure			
Regeneration and Growth	93,574	114,238	34,801
Environment and Neighbourhoods	12,539	7,819	7,569
Adult Social Care	600	2,748	748
Children & Young People	306	300	0
Central	400	400	400
Total GF expenditure	107,419	125,505	43,518
Housing HRA	23,726	25,811	10,362
Total Expenditure	131,145	151,316	53,880
Resources			
Grant and External Contributions	(83,929)	(111,353)	(34,040)
Internal Contributions	(2,167)	(966)	(900)
Capital Receipts	(2,468)	(2,638)	(1,637)
S106 & CIL Funding	(3,278)	(126)	(10)
Unsupported Borrowing	(14,880)	(10,422)	(6,931)
Self-funded borrowing	(697)	0	0
Total GF Resources	(107,419)	(125,505)	(43,518)
Housing HRA	(23,726)	(25,811)	(10,362)
Total Resources	(131,145)	(151,316)	(53,880)

This table assumes that the budget virements contained in the finance report on the agenda for Cabinet on 13 October 2014 are agreed.

- 6.3 In considering the financing of the capital programme Members need to bear in mind the source of the financing. Capital receipts and unsupported borrowing are un ring fenced contributions that give the council complete discretion as to what assets are invested in.
- 6.4 However, unsupported borrowing in its current form is unlikely to be sustainable beyond 2016/17. Table five shows that the council currently plans to raise around £13.6m of general capital financing by this route to 2016/17. At current historically low interest rates the financing charge is likely to be around £1m p.a. (including provision for repayment of principal). Borrowing to finance investments or projects that will have a financial payback can be approved on a case by case basis, but the council's overall financial position is likely to mean that further borrowing for general purposes is unlikely to be affordable beyond this date.
- 6.5 Capital receipts are also declining over the period and are likely to continue to do so beyond that date. The council has only a finite number of capital assets, and once strategic sites in which the council has a long-term interest are taken into account the prospect for future cash generating disposals diminishes.
- 6.6 This leaves s106/CIL as sources of finance over which the council has some influence, but not direct control, and grants, which are normally specified for particular purposes by the grant giving department.
- 6.7 In short, the council's ability to determine its future capital programme is becoming more constrained. If other sources of financing are not identified in the medium term then the eventual consequence will be that the council's capital programme is entirely centrally determined.
- 6.8 Further reports on the capital programme to 2017/18 and 2018/19 will be brought to Cabinet during the budget setting process. At this stage Cabinet are merely requested to note the position.
- 6.9 It is also relevant in setting the budget to consider the likely amount of the Dedicated Schools' Grant (DSG). Technically this forms part of the general fund, but in practice most of it is delegated to schools according to a locally agreed formula for them to manage directly. Following discussions with the schools' forum elements of the DSG are also retained centrally to pay for certain services that are more effectively commissioned at the borough rather than school level.
- 6.10 The total DSG is set nationally, having regard to the number of school age children, weighted for factors such as the number of those with English as a second language and other factors that are assumed to affect the average cost of providing educational services. Once more accurate data from the DfE is available to inform the 2015/16 budget then more precise determinations can be made.
- 6.11 It is worth noting that education funding generally, and for schools in particular, has been rising above the rate of inflation since 2010, in contrast to

other council funding which has suffered real and cash decreases, and that this trend is expected to continue.

- 6.12 The Housing Revenue Account (HRA) follows a different budget setting cycle to the general fund. The key determinant is the rent increase, as rent accounts for over 90% of the income to the HRA. Councils are expected, but not required, to follow the Government's guidance on social rent policy, which is to increase rents annually from 2015 onwards by CPI plus 1%. In November 2013, when considering the HRA asset management strategy, the Council's Executive agreed a rent policy for 2014-2019 in which council rents should increase in line with the former rent convergence regime, and specifically from 2015, by CPI plus 1% plus £2, subject to annual approval by the Cabinet (formerly Executive).
- 6.13 A separate report on the HRA budget and rent setting for 2015-16 will be brought to Cabinet in February 2015.

7.0 Financial Implications

- 7.1 There are no direct financial implications of agreeing the recommendations of this report. However, the entire report is clearly highly relevant to the council's overall financial standing.
- 7.2 The overall budget setting timetable for the 2015/16 is set out below:

Date	Activity
17/11/14	Full Council: First Reading debate
15/12/14	Cabinet: Collection Fund Surplus
26/01/15	Cabinet: Budget Proposals 2015/16
29/01/15	General Purposes: Council Tax Base and Business Rates Estimate
02/03/15	Full Council: Budget and Council Tax Setting

8.0 Legal Implications

- 8.1 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 the Local Government Finance Act 1992 to calculate as part of their overall budget what amounts are appropriate for contingencies and reserves. The Council must ensure sufficient flexibility to avoid going into deficit at any point during the financial year. The Chief Financial Officer is required to report on the robustness of the proposed financial reserves.
- 8.2 Under the Brent Member Code of Conduct members are required when reaching decisions to have regard to relevant advice from the Chief Finance Officer and the Monitoring Officer. 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.

- 8.3 In accordance with the Local Government Finance Act 1992, 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 or (c) any recommendation, resolution or other decision which might affect the making of the Annual Budget calculation. These rules are extremely wide in scope so 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 DCLG) shared this interpretation as it made clear in its letter to the AMA dated 28th May 1992. 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. Breach of the rules is a criminal offence under section 106 which attracts a maximum fine of £1,000.

9.0 Diversity Implications

- 9.1 Impact assessments will be carried out in advance of formulation of budget proposals.

10.0 Staffing Implications

- 10.1 None directly as a result of this report.

11.0 Background Information

- 11.1 Report to Executive, 14 October 2013 – Budget Strategy Update

12.0 Contact Officer

- 12.1 Conrad Hall, Chief Finance Officer
conrad.hall@brent.gov.uk

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 Brent	Cabinet 13 October 2014 Report from the Chief Finance Officer
For information only	Wards affected: ALL
Financial Report – August 2014	

1.0 Summary

- 1.1 The report sets out the overall financial position of the Council for 2014/15 as at August 2014 and covers the following topics:
- Budget monitoring summary
 - Council Tax & NNDR collection rates
 - Debt analysis
 - Capital Programme summary
 - Financial Control

2.0 Recommendations

- 2.1 To note the attached Finance report.
- 2.2 To approve the budget virements for the capital programme as set out in section 5 of the Financial Report appendix.

3.0 Detail

- 3.1 This report is the second of a new quarterly Finance Report for 2014/15 for the Cabinet. This report covers the period to August 2014. Please see attached appended Finance Report.

4.0 Financial Implications

- 4.1 This report is entirely concerned with Finance and the detail is contained in the body of the appendix.

5.0 Legal Implications

- 5.1 There are no legal implications arising from this report.

6.0 Diversity Implications

- 6.1 There are no diversity implications arising from this report.

7.0 Staffing/Accommodation Implications (if appropriate)

7.1 There are no staffing/accommodation implications arising from this report.

8.0 Contact Officers

8.1 Conrad Hall, Chief Finance Officer
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Eamonn Mccarroll, Operational Director – Finance
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**Cabinet
13 October 2014
Report from the Chief Finance
Officer**

FINANCIAL REPORT – AUGUST 2014

1.0 Purpose

- 1.1 This report highlights the overall financial position of the Council as at August 2014. The report will cover the following topics:

Budget Monitoring summary
2014/15 Savings
Council Tax & NNDR Collection Rates
Debt analysis
Capital Programme summary
Financial Control

2.0 Budget Monitoring Summary

- 2.1 As at August 2014 the council's General Fund budget is forecast to be underspent by £2.1m at the year-end, compared to the £1.0m underspend that was forecast in the last quarter. The net movement of £1.1m reflects a reduction in the forecast outturn of £0.6m in Adult Services, £0.1m in Regeneration and Growth as well as a further reduction in forecast outturn of £0.4m in Public Health. The position by department is as set out below.

Department	Gross Expenditure Budget	Gross Income Budget	Net Budget	Forecast Outturn	Forecast Variance
	£m	£m	£m	£m	£m
Children & Young People	59.1	(17.6)	41.5	42.4	0.9
Adult Services	113.1	(22.1)	91.0	90.8	(0.2)
Regeneration & Growth	86.9	(54.8)	32.1	31.2	(0.9)
Environment & Neighbourhoods	72.6	(40.3)	32.3	32.3	0.0
Central Departments	35.8	(5.1)	30.7	30.7	0.0
Public Health	18.8	0.0	18.8	16.9	(1.9)
Total	386.3	(139.9)	246.4	244.3	(2.1)

The following budgets are ring fenced and are forecast to underspend by £0.3m at the year end. A breakeven forecast was reported in last the quarter. The movement of £0.3m was due to a revised forecast within the Housing Revenue Account.

Ring-Fenced budgets	Gross Expenditure Budget	Gross Income Budget	Net Budget	Forecast Outturn	Forecast Variance
	£m	£m	£m	£m	£m
Dedicated Schools Grant	206.1	(206.1)	0.0	0.0	0.0
Housing Revenue Account	55.3	(55.2)	0.1	(0.2)	(0.3)
Total	261.4	(261.3)	0.1	(0.2)	(0.3)

The key issues underpinning these forecasts are as follows:

2.2 **Children & Young People**

The overall Children & Young People forecast is an overspend of £0.9m, which is unchanged from the last month. This is made up of £0.9m overspend in Early Help and Education and a breakeven position in Children's Social Care.

The overspend is primarily attributable to Special Educational Needs (SEN) Transport. There was a similar overspend of £0.9m in 2013/14. A number of actions are being taken to contain this pressure, including a reassessment of all transport eligible SEN pupils and a proposal to charge Post-16 SEN pupils, as this element of the service is discretionary.

As at August 2014, there were 1,670 SEN pupils in total and 702 were eligible for travel. This compares to 1,670 total SEN pupils in April 2013 where 720 were eligible for travel. Despite the overall number of eligible pupils decreasing by 2.5% since last year, the needs of the remaining pupils are more complex in nature and therefore have relatively higher costs as a result.

In previous years, the overspend against this service has been offset by compensating underspends in other areas of the overall budget. As a result, an exercise is currently underway to re-align the budget and to explore the scope of containing this overspend within the Children & Young People budget envelope.

2.3 **Adult Services**

The overall forecast is for an under spend of £0.2m which compares to an over spend of £0.4m reported in last quarter, a movement of £0.6m. This movement relates to income for Continuing Health Care that has now been quantified and incorporated into the forecast.

There is a saving target of £0.9m in 2014-15 relating to identifying clients entitled to Continuing Health Care funding from the Clinical Commissioning Group. This has been overachieved by £0.4m. The majority of this income to be received is backdated from previous financial years and therefore should be considered largely as a one-off. There

are still outstanding clients to be assessed, therefore it is expected that the forecast will be reviewed and increased through the year.

Additionally there is also an under spend across the service of £0.4m relating to current on-going recruitment into vacant posts.

Against this under spend, Mental Health Residential Care continues to forecast an over spend of £0.6m. There is continued work to ensure robust procedures are in place for Brent Mental Health Services to reduce Residential care costs by reducing clients numbers from 38 to 18 during the course of the year. This is to meet the savings target of £1.0m for 2014/15, for which residential care reductions account for £0.6m. This over spend will be reduced when the Departmental Management Team (DMT) have confidence that the early intervention and demand management measures put in place are having the desired effect on client numbers.

2.4 Regeneration & Growth

The department is reporting an underspend of £0.9m, which was £0.8m in the last quarter. The movement reflects an increase in the forecast outturn underspend. The underspend includes a saving of £0.6m achieved from Supporting People budget as a result of cost efficiencies from service retendering. There is also a net overspend of £0.2m within Temporary Accommodation due to increasing number of supported families in Bed and Breakfast. In addition, the current allocation of Local Welfare Grant is anticipated to underspend by £0.5m which is planned to be held in a reserve for future years use following the cessation of the grant from Central Government.

There is currently a shortfall in anticipated Civic Centre income which is being covered from a specific reserve. This will continue in the current year but is not a sustainable option for future years and therefore a proposed strategy is currently being finalised to fund the Civic Centre operations from 2015/16 onwards.

Temporary Accommodation (TA) is a complex budget, with the financial results being highly sensitive to the numbers of households placed, the mix of accommodation into which they are placed, the impact of the Council's strategies to reduce unit costs and the impact of the housing benefit system.

The TA position is based on a detailed supply and demand model which identifies costs, the incidence of TA numbers during the year and across the different schemes and the impact of related housing benefit subsidy. Service managers are predicting that 3,247 families will be remaining in TA by the end of March 2015, an increase of around 68 from last month's projection. This is as a result of the increased incidence of families presenting and being accepted as requiring Temporary Accommodation and the impact of increased numbers in bed and breakfast due to a shortfall in available rented properties. There continues to be significant risks attached to the Council's ability to control demand led pressures relating to TA service whilst ensuring that statutory duties are met.

2.5 Environment & Neighbourhoods

Environment & Neighbourhoods are currently forecasting a breakeven position, which is unchanged from the last quarter. Quarter 1's confirmed waste data shows an upward movement on last year's actual and an even larger upwards movement on the Public Realm contract target base year of 2012/13. This movement is repeated across all west London boroughs. Household waste increase is linked to two factors – economic recovery

and population/housing growth. There is a lesser impact affecting organic waste due to seasonal factors. It is reasonable to assume that a wetter spring explains some of the uplift in garden waste.

Due to the above, Veolia are currently significantly outside their tonnage commitment in respect of residual waste tonnages and face a potential full year recharge from the council in excess of £1m for additional costs incurred. Whilst this is provided for within the risk transfer that was negotiated as part of the new Public Realm Contract there is a risk that not all of the additional costs will be refunded. This is currently under review and negotiation with Veolia to discuss and agree options for bringing the contract target back in line.

2.6 Central Departments

Central Departments are all forecast to break even, as per the last quarter. The Public Health is reporting an underspend of £1.9m, which was £1.5m in the last quarter. The movement of £0.4m is primarily due to a revised forecast. As at August 2014, there are commitments of £16.1m against the £18.8m ring fenced grant, leaving £2.7m to be committed to projects. A view has been taken on the likely spend against new projects for the rest of 2014/15. The forecast will be revised through the year as the progress of these projects becomes clearer.

2.7 Ring Fenced Budgets

Dedicated Schools' Grant

The Department for Education has announced the DSG settlement figure for all local authorities. The provisional amount for Brent has been set at £206.1m after recoupment of academies and direct funding for High Needs places. This is however subject to change throughout the year as academy conversions materialise during 2014/15.

Of the 82 schools in Brent, 65 remain under the local authority umbrella and are referred to as maintained schools. At present, 6 of the 65 maintained schools in Brent are in a deficit position. Schools in deficit are required to apply for a licensed deficit and abide by the terms of the licensed deficit policy. Currently 5 licensed deficits have been approved with 1 still under review to ensure the plan is robust.

Housing Revenue Account

The Housing Revenue account is currently forecasting an underspend of £0.3m. This is mainly due to savings in the repairs and maintenance element of the budget due to the roll out of the new contract with Wates.

3.0 Savings

- 3.1 The table below summarises the 2014/15 savings by service area and a forecast as at August 2014. Out of £17.8m of committed savings, £17.3m (97.2%) are forecast to be delivered, which is unchanged from the previous quarter.

Service Area	2014/15 Savings	Percentage of 2013/14 budget	Forecast Savings	Forecast Variance
	£m		£m	£m
Children & Young People	3.2	7.1%	3.0	0.2
Adult Services	4.5	4.8%	4.2	0.3
Regeneration & Growth	2.7	7.6%	2.7	0.0
Environment & Neighbourhoods	3.4	9.6%	3.4	0.0
Central Departments	4.1	11.6%	4.1	0.0
Total	17.8		17.3	0.5

3.2 Children and Young People are forecasting a shortfall against their savings target. As described in paragraph 2.2 above this relates to SEN Transport, in particular savings due to efficiencies in routing (£0.1m) and savings arising from new eligibility criteria (£0.1m). Whilst new eligibility criteria has seen a 2.5% reduction in SEN pupils receiving transport, the total number of reductions has not been enough to deliver the savings committed.

3.3 Adult Services are forecasting a shortfall against their savings target. As described in paragraph 2.3 above Mental Health Services have a savings target of £1.0m, of which £0.3m has yet to be achieved in terms of a reduction in Mental Health residential care placements.

4.0 Debt & Income Collection Analysis

4.1 The Council collects income from individuals and businesses for a range of reasons. The main types of income are:

Charges for Social Care Services

Council Tax

Business Rates (National Non-Domestic Rates)

Parking Fines

Housing Rents

We also collect a wide range of fees and charges for everything from Land Registry Searches to Planning Applications and Licenses.

- 4.2 Oracle debt includes invoices raised by service areas and is collected by the Finance Service Centre. The table below shows the balances for 2014/15.

	Apr £m	May £m	June £m	July £m	August £m
Opening balance	7.3	7.4	6.2	7.7	7.3
Invoices Raised	2.1	0.8	2.3	0.9	0.3
Collected	2	2	0.8	1.3	1.4
Closing Balance	7.4	6.2	7.7	7.3	6.2

Of the outstanding debt of £6.2m, 43% relates to invoices up to 60 days past their due date. 46% relates to debt over 360 days and is being pursued by the FSC debt recovery team, although £0.9m is secured against an asset. Cash collected in 2014/15 to date exceeds invoices raised by £1.1m which indicates that old debts are being recovered.

- 4.3 The ABACUS system records debt relating to Social care fees and charges for council run services including residential care, day care, home care, adaptations, equipment etc. The table below shows the balances for 2014/15.

	Apr £m	May £m	June £m	July £m	Aug £m
Opening Balance	10.4	10.4	10.2	10.3	10.3
Invoices Raised	0.7	0	1.5	0.7	0.8
Collected	0.7	0.2	1.4	0.7	0.9
Closing Balance	10.4	10.2	10.3	10.3	10.2
Balance disaggregated to:					
Unsecured client debt	7.9	7.8	7.9	7.9	7.8
Secured (against Property) client debt	2.5	2.4	2.4	2.4	2.4

The level of unsecured Adult Services debt is a large proportion of the overall debt (76%). A cross council project has been established to address this issue in terms of financial assessments for contributions to social care costs. It also ensures that the Council takes account of the impact of the implementation of the Care Bill from April 2015.

- 4.4 In terms of Council Tax, the total amount required to be collected for 2014/15 is £83.9m (excluding the GLA share) and the collection rate target is 95.9%. Council Tax collection for 2014/15 was 48.1% at the end of August 2014 compared to 48.6% for August 2013. The difference is partly due to an extra weekend day at the end of this August, and a large payment from BHP being made in August last year, but in September this year. The gap should narrow or be bridged in September.
- 4.5 Following government legislation, the Council introduced Council Tax Support (CTS) in April 2013, whereby a large number of residents now pay a proportion of their bills, instead of receiving full Council Tax Benefit. For 2014/15 there has been a significant reduction in the total of CTS granted, largely due to falling unemployment. The total granted for 2013/14 was £28.7m, compared to £26.9m in 2014/15. Therefore, it is anticipated that the total cash collectable will be over £1.0m higher as a result (after allowing for the GLA share and anticipated collection rates). There has also been an increase in cash collectable as a result of new properties coming in to rating and a reduction in discounts. The overall effect of this (including the reduction in CTS) is to increase Brent's share of the collectable income by approximately £2m.
- 4.6 For NNDR, the total amount collectable is £110.0m (where Brent retains a 30% share as a result of legislative changes to Business Rates) and the collection rate target is 97.7%. As at August 2014, the collection rate was 46.2%. This is below the equivalent rate of 49.3% in August 2013, but this is largely to payees now being able to pay in 12 monthly instalments (as a result of government legislation) as opposed to 10 instalments in 2013/14.
- 4.7 Parking debt is analysed by measuring the total number of Penalty Charge Notices (PCNs) issued against the expected yield of the total debt raised, as shown below:

Month	Debt Raised £m	Issued PCNs	Forecast £m	Cash collected on 14/15 PCNs £m	Cash collected from previous years debt £m	Total cash collected £m
Apr-14	1.3	14,079	0.715	0.625	0.081	0.706
May-14	1.4	15,659	0.796	0.582	0.075	0.657
Jun-14	1.1	14,139	0.700	0.246	0.504	0.750
Jul-14	1.2	13,844	0.700	0.622	0.085	0.707
Aug-14	1	12,898	0.700	0.605	0.095	0.700
Total	6.00	70,619	3.611	2.680	0.840	3.520

- 4.8 Whilst there are variations in the volume of PCN issued during the current year, the level of revenue forecast remains broadly the same as 2013/14, representing around 65% of actual debt raised. The method of forecasting is based on a prevailing 18 month PCN yield multiplied by the volume of sales by month.

- 4.9 The brought forward enforcement debt relating to previous financial years is £3.4m (£1.7m from 2012/13 and £1.7m from 2013/14). A bad debt provision was created for this debt, based on an expected recovery rate. To date approx. £0.84m of this debt has been collected.
- 4.10 HRA Council Tenant debt is analysed in three categories; Current Tenants, Former Tenants and Other Non-Rental Debts.

The table below shows the balances for 2014/15.

	June £'000	August £'000
Current Tenants	1,232	1,464
Former Tenants	489	588
Other	634	571
Total	2,355	2,623

- 4.11 Overall debt has increased from £2.355m in June to £2.623m in August. This indicates a fall in income collection over the last two months. BHP is currently undertaking a review of the arrears escalation policy to ensure that this trend does not continue.
- 4.12 Approximately 22% of the total debt at the end of August relates to Former Tenants arrears where tenants have left their properties owing rent to the Council. These debts continue to be chased where former tenants can be traced.
- 4.13 The outstanding debt in comparison to 2013/14 has increased by 12%. A 100% provision was created at the end of March 2014 for the above Council Tenants arrears.

5.0 Capital

- 5.1 The following table sets out the 2014/15 Capital budget and forecast as at August 2014. Appendix 1 to this report provides a more detailed breakdown of the Capital Budgets and forecasts for 2014/15 and further includes the Medium Term Financial Plan (Financial Years 2015/16 and 2016/17). The table includes £74.1m carried forward from 2013/14 which increases the 2014/15 Budget from £138.8m to £212.9m.

Service Area	2014/15 Original Capital Budget	Re-Phasing from 2013/14	2014/15 Total Amended Budget	2014/15 Forecast Outturn	Forecast Variance
	£m	£m	£m	£m	£m
Adult Services	2.5	0.1	2.6	0.6	(2.0)
Children and Young People	0	0.6	0.6	0.3	(0.3)
Environment & Neighbourhoods	8.6	4.6	13.2	12.5	(0.7)
Finance & IT	0.4	0	0.4	0.4	0.0
Regeneration & Growth	109.83	62.6	172.4	93.6	(78.8)

Regeneration & Growth (HRA)	17.5	6.2	23.7	23.7	0.0
Total	138.8	74.1	212.9	131.1	(81.8)

- 5.2 An initial exercise has been completed to re-phase the capital budgets to provide more accurate forecasts of the incidence of capital expenditure over the financial years 2014/15 to 2016/17 (the Medium Term Financial Plan). This exercise has transferred a significant level of forecast expenditure into future years.

- 5.3 The table at 5.1 above includes the impact of the re-phasing exercise carried out in the Forecast Outturn Column.

The Cabinet is requested to approve the sum of £131.1m as shown in the 2014-15 Forecast column within table 5.1 as the Amended Budget for 2014/15 and approve the impact of the rephasing exercise on the Medium Term Financial Plan as detailed in Appendix 1.

Adult Services

- 5.4 The forecast variance relates to re-phasing of £2.0m to 2015/16 in respect of the New Accommodation for Independent Living (NAIL) One Council Project where capital expenditure has been committed in 2015/16.

Children and Young People

- 5.5 The forecast variance relates to re-phasing of £0.3m to 2015/16 in respect of grants provided to Private, Voluntary and Independent (PVI) nurseries for building works to accommodate children with disabilities.

Environment & Neighbourhoods

- 5.6 The forecast variance on includes re-phasing of £0.1m on the Delivering the Sports Strategy and £0.1m on the Parks and Sports S106 budgets to future years. Additional major amendments to the department's 2014/15 capital budget are as follows:
- Estate & Stadium Access Corridors –£1.1m underspend due to Neasden Footbridge not progressing.
 - Transport for London Funded Schemes – £0.5m additional grant received
- 5.7 In respect of the Medium Term Budget the following amendments have arisen:
- Delivering the Sports Strategy – £0.2m additional grant income forecast in 2015/16 from TfL and LMCT.
 - Transport for London Funded Schemes – Future year grant allocation forecasts reduced by £0.7m in both 2015/16 and 2016/17 to reflect current expectations.

Regeneration and Growth

- 5.8 The forecast variances are as follows:

Non-Housing

- Civic Centre - £1.0m
- South Kilburn Regeneration – (£16.3m)
- Regeneration Areas – (£0.2m)
- Ark Academy – (£0.5m)
- Crest Academy – (£3.5m)
- Expansion of Primary/Secondary School Places – (£55.3m)
- Schools Asset Management Plan – (£2.6m)
- Devolved Formula Capital – (£0.2m)
- Universal Infant Free School Meals – Capital Grant – (£0.2m)
- Carbon Reduction Measures – (£0.4m)

- Enfranchisement Schemes – (£0.4m)
- GLA Re-Fit Programme (New Scheme) - £0.9m

The variances are predominantly as a result of re-phasing. Schemes where there is a variance to the capital programme over the medium term are as follows:

- Civic Centre – £2m forecast to meet the additional costs of post occupation profiled as £1m in both 2014/15 and 2015/16.
- South Kilburn Regeneration –£5.2m additional forecast expenditure over the period from 2014/15 to 2016/17 will be met from forecast capital receipts yet to be received.
- Schools
 - £0.4m forecast to be spent beyond the medium term plan in 2017/18 on Asset Management Plan.
 - £0.6m additional expenditure on Manor School as per the August 2014 Cabinet approval.
 - £1.15m reduced expenditure on the Phase 2 Permanent School expansions per returned works tenders.
- Devolved Formula Capital – £0.2m reduction to reflect detailed allocations to individual schools.
- Universal Infant Free School Meals - £0.2m reduction to reflect the element of grant paid directly to the VA schools.
- Carbon Reduction Measures
 - £0.5m reduction to reflect the current detailed forecast balance and loan repayments due to the Salix capital reserve.
 - £0.3m virement to the GLA Re-Fit Programme scheme as per July Cabinet approval.
- GLA Re-Fit Programme – £0.9m for new scheme as per July Cabinet approval.

Housing General Fund

- £1.2m reduction on Private Sector Renewal Support Grants, of which £0.9m has been identified as a saving to the Medium Term plan.

Regeneration and Growth (HRA)

- 5.9 All schemes are forecast to be within budget. There is no forecast re-phasing of budgets to future years within the medium term plan at this time, although this is currently under review as part of the overall update to the HRA Business Plan.

6.0 Financial Control

- 6.1 Financial control is essential to the operation of any large organisation. The council operates many standard processes, such as budgetary control, risk management and internal audit to ensure that controls operate as intended, and where exceptions are identified these are reported to senior officers and Members in order that corrective action can be taken. The particular issues that should be highlighted at this stage are set out below.

- 6.2 In 2013/14 43% of all internal audit reports showed a limited assurance level for the services in question. The Audit Committee is monitoring the situation closely in 2014/15,

including scrutinising recent reports where controls were considered less than satisfactory. At this stage in 2014/15 the internal audit programme has not completed, and had not planned to complete, significant elements of its systems assurance work, although many projects are well underway. Progress against these will be monitored at the Audit Committee and reported on to Cabinet if the levels of assurance do not improve on 2013/14.

- 6.3 There are 78 projects on the current plan (excluding follow up and advisory work). Work has commenced on 39 of these. 18 projects have been completed to draft or final stage. 14 of these have an audit opinion associated with them, 11 are substantial, 3 are limited. The other projects were grant certifications which do not have an assurance rating.

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Directorate	Programme	Original 14-15 Budget	Rephasing From 2013-14	Amended 14-15 Budget	Original 15-16 Budget	Original 16-17 Budget	Forecast 14-15 Budget	Forecast 15-16 Budget	Forecast 16-17 Budget	Forecast 17-18 Budget
Adults	Framework-I Implementation (Social Care/Mental Care)	-	59,000	59,000	-	-	59,000	-	-	-
Adults	Supported Living to Extra Care	2,540,940	-	2,540,940	-	-	540,940	2,000,000	-	-
Adults	Surplus Capital Grant not yet Allocated to Schemes	-	-	-	748,000	748,000	-	-	748,000	-
	Total Adult Social Care	2,540,940	59,000	2,599,940	748,000	748,000	599,940	2,748,000	748,000	-
Childrens	Increasing PVI nursery provision provision for two years	-	616,600	616,600	-	-	306,600	300,000	-	-
	Total Children & Young People	-	616,600	616,600	-	-	306,600	300,000	-	-
ENS	Air Quality Works	-	46,978	46,978	-	-	46,978	-	-	-
ENS	Cemetery and Mortuary Service	20,000	5,718	25,718	20,000	20,000	25,718	20,000	20,000	-
ENS	Civic Centre CCTV	-	15,371	15,371	-	-	15,371	-	-	-
ENS	Delivering the Sports Strategy	535,000	811,803	1,346,803	535,000	535,000	1,332,803	700,000	535,000	-
ENS	Estate & Stadium Access Corridors	-	1,190,610	1,190,610	-	-	100,000	-	-	-
ENS	Libraries RFID	-	92,904	92,904	-	-	92,904	-	-	-
ENS	Parks	145,000	57,459	202,459	145,000	145,000	202,459	145,000	145,000	-
ENS	Parks and Sports S106	-	1,068,871	1,068,871	-	-	953,871	105,000	10,000	-
ENS	Pavements, Roads and Streetscene/Street Trees	3,550,000	-	3,550,000	3,550,000	3,550,000	3,550,000	3,550,000	3,550,000	-
ENS	Transport for London Funded Schemes	4,000,000	229,150	4,229,150	4,000,000	4,000,000	4,713,150	3,298,500	3,308,700	-
ENS	Transportation s106 schemes	-	1,045,448	1,045,448	-	-	1,156,629	-	-	-
ENS	Vale Farm Improvements	348,975	-	348,975	-	-	348,975	-	-	-
	Total Environment & Neighbourhood Services	8,598,975	4,564,313	13,163,288	8,250,000	8,250,000	12,538,859	7,818,500	7,568,700	-
F&IT	ICT Initiatives	400,000	-	400,000	400,000	400,000	400,000	400,000	400,000	-
	Total Finance & IT	400,000	-	400,000	400,000	400,000	400,000	400,000	400,000	-
R&G	Ark Academy	-	1,092,208	1,092,208	-	-	600,000	492,208	-	-
R&G	Asset Management Plan	410,000	-	410,000	410,000	410,000	410,000	410,000	410,000	-
R&G	Barham Park Regeneration	-	576,662	576,662	-	-	576,662	-	-	-
R&G	Bridge Park Regeneration	1,447,000	-	1,447,000	-	-	1,447,000	-	-	-
R&G	Carbon Reduction Measures	250,000	264,361	514,361	250,000	250,000	90,500	65,950	28,520	8,148
R&G	GLA Refit Programme	-	-	-	-	-	941,980	-	-	-
R&G	Chalkhill	-	526,995	526,995	-	-	526,995	-	-	-
R&G	Church End Regeneration	542,000	-	542,000	450,000	-	381,360	160,000	450,640	-
R&G	Civic Centre	-	600,000	600,000	-	-	1,600,000	1,000,000	-	-
R&G	Crest Academies	5,951,077	6,467,157	12,418,234	-	-	8,918,234	3,500,000	-	-
R&G	Devolved Capital	432,121	1,356,991	1,789,111	432,121	432,121	1,604,812	432,121	432,121	-
R&G	Dollis Hill House	-	3,292	3,292	-	-	3,292	-	-	-
R&G	Enfranchisement	-	709,895	709,895	-	-	270,000	439,895	-	-
R&G	Expansion of Secondary/Primary School Places	61,585,397	28,621,180	90,206,577	18,244,957	15,502,329	34,951,000	69,810,000	19,192,863	-
R&G	HCA Empty Homes Grant	498,066	-	498,066	-	-	498,066	-	-	-
R&G	Kilburn Library refurbishment	-	5,000	5,000	-	-	5,000	-	-	-
R&G	Landscaping Programme	-	658,636	658,636	-	-	637,836	20,800	-	-
R&G	Planning and Major Projects S106 schemes	-	206,633	206,633	-	-	200,000	-	-	-
R&G	Pop Down Square	215,000	100,000	315,000	-	-	315,000	-	-	-
R&G	Private Sector Renewal Support Grant and Disabled Facilities Grant	4,780,000	1,291,140	6,071,140	4,780,000	4,780,000	4,911,934	4,910,000	4,910,000	-
R&G	Property S106 Schemes	-	43,555	43,555	-	-	43,555	-	-	-
R&G	S106 & CIL Estimate	5,500,000	(5,500,000)	0	5,500,000	5,500,000	0	0	0	0
R&G	Roundwood Youth Centre	-	36,929	36,929	-	-	36,929	-	-	-
R&G	Schools Asset Management Plan	2,550,000	3,986,342	6,536,342	2,050,000	2,050,000	3,984,700	3,217,800	3,000,000	433,842
R&G	South Kilburn Regeneration Project	24,833,511	9,045,849	33,879,360	9,914,177	4,732,446	17,568,257	29,779,273	6,376,842	-
R&G	Universal Infant Free School Meals Capital	832,725	-	832,725	-	-	590,291	-	-	-
R&G	Village School	-	1,401,945	1,401,945	-	-	1,401,945	-	-	-
R&G	Willesden Green Library Development	-	9,775,445	9,775,445	-	-	9,775,445	-	-	-
R&G	Woodfield School Expansion	-	1,282,971	1,282,971	-	-	1,282,971	-	-	-
	Total Regeneration and Growth	109,826,896	62,553,185	172,380,081	42,031,254	33,656,895	93,573,763	114,238,046	34,800,985	441,990
R&G (HRA)	Additional Affordable Housing	7,134,213	1,335,000	8,469,213	15,450,000	-	8,469,213	15,450,000	-	-
R&G (HRA)	Disabled Facilities Works (on council properties)	600,000	-	600,000	600,000	600,000	600,000	600,000	600,000	-
R&G (HRA)	Health & Safety Works	-	1,565,044	1,565,044	-	-	1,565,044	-	-	-
R&G (HRA)	Loft Conversions	-	30,430	30,430	-	-	30,430	-	-	-
R&G (HRA)	Major repairs of council properties	9,761,835	2,760,006	12,521,841	9,761,835	9,761,835	12,521,841	9,761,835	9,761,835	-
R&G (HRA)	Rooftop Aerials to Housing Blocks	-	539,560	539,560	-	-	539,560	-	-	-
	Total Regeneration and Growth (HRA)	17,496,048	6,230,039	23,726,087	25,811,835	10,361,835	23,726,087	25,811,835	10,361,835	-
	Total Capital Programme	138,862,859	74,023,138	212,885,997	77,241,089	53,416,730	131,145,249	151,316,381	53,879,520	441,990

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 Brent	Cabinet 13 October 2014 Report from the Chief Finance Officer
For Action Wards Affected: [ALL]	
Authority to tender a contract for Automated Call Distribution (ACD) system	

1.0 Summary

- 1.1 This report concerns the procurement of an Automated Call Distribution (ACD) system to replace the existing solution provided to the council by Interactive Intelligence. This report requests approval, as required by Contract Standing Orders 88 and 89, to invite tenders in respect of a solution to enable the council to manage and handle incoming telephone calls, customer emails, webchat and social media customer interaction.

2.0 Recommendations

- 2.1 The Cabinet to give approval to invite tenders for an Automated Call distribution (ACD) solution to enable the council to manage and handle incoming telephone calls, customer emails, webchat and social media customer interaction on the basis of the considerations set out in paragraph 3.6 of the report.
- 2.2 The Cabinet to give approval to officers to evaluate the tenders referred to in 2.1 above on the basis of the evaluation criteria set out in paragraph 3.6(vi) of the report.
- 2.3 The Cabinet to approve a waiver from Contract Standing Orders for the requirement to seek written quotations and to give approval to the direct award of a short-term contract to Interactive Intelligence for a period of six months in the circumstances and for the reasons set out in paragraph 3.7 of the report.

3.0 Detail

- 3.1 The Purpose of this report is to get agreement from the Cabinet to invite tenders for a new ACD solution for handling and managing customer contacts.
- 3.2 The current supplier of this solution is Interactive Intelligence. The existing contract is due to expire on 31 March 2015 and there is no further contractual provision to extend this. This means that a competitive procurement process now needs to be undertaken to enable a new contract to be in place.
- 3.3 The current ACD solution is used to handle incoming telephone calls to the customer services contact centre, as well as smaller contact centres in Finance, Registrars, Housing and Brent Housing Partnership. Officers are also currently piloting the use of the solution to administer incoming customer emails and in the future anticipate exploring the use of the ACD solution for webchat and social media customer interaction.
- 3.4 The solution is a key component of a new customer access strategy which is aiming to improve residents' experience when they contact the Council. In order to achieve this a new Operating Model is planned which includes the use of ACD technology to manage the majority of customer telephone calls. The Council currently has up to 120 concurrent users using the ACD system, however we are licensed for 300 concurrent users and we expect to be increasing our use of the solution significantly.
- 3.5 The contract for the current system has already been extended and is ending on 15th March 2015.
- 3.6 In accordance with Contract Standing Orders 88 and 89, considerations have been set out below for the approval of the Cabinet.
- 3.6.1 Officers are proposing to conduct a further competition exercise under the Crown Commercial Service framework RM1498 PSN Services, Lot 5 Contact Centre Services ("The Framework"). This framework was established in June 2012, and expires on 26th June 2015. There are 11 suppliers on Lot 5.
- 3.6.2 The suppliers were appointed to the framework based on the most economically advantageous tenders.
- 3.6.3 Use of the framework will enable a faster procurement process, and will save considerable officer resources, as the suppliers have already been prequalified by the Crown Commercial Service.

There is no charge to the Council for using the framework.

Ref.	Requirement	
(i)	The nature of the	Solution to enable the council to manage and handle

Ref.	Requirement		
	service.	incoming telephone calls, customer emails and social media customer interaction by the call centre	
(ii)	The estimated value.	£75K per annum	
(iii)	The contract term.	3 Years with two optional 1 Year extensions	
(iv)	The tender procedure to be adopted.	Further competition exercise from Crown Commercial Services framework RM1498, Lot 5.	
v)	The procurement timetable.	Indicative dates are:	Dates
		Invite to tender	Nov 2014
		Deadline for tender submissions	Dec 2014
		Panel evaluation and shortlist for interview	Dec 2014
		Interviews and contract decision	Dec 2014
		Report recommending Contract award circulated internally for comment	22/12/14
		Cabinet approval	26/01/15
		Contract Mobilisation	Feb 2015
		Contract start date	01/04/15
(vi)	The evaluation criteria and process.	At tender evaluation stage, the panel will evaluate the tenders against the following criteria: • Quality criteria consisting of: ▪ Fitness for purpose including quality ▪ Delivery • Price criterion consisting of: ▪ Total Lifecycle costs The criteria will be a 60/40 Quality to Price %	

Ref.	Requirement	
		weighting for the tender assessment.
(vii)	Any business risks associated with entering the contract.	The main risk in entering a new contract for this solution is business disruption during the service transition to a new supplier. This risk will be mitigated through the planning, setting up a dedicated project team, effective communication and training of all staff impacted by these changes
(viii)	The Council's Best Value duties.	The council has a duty to make arrangements to secure continuous improvements in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness. This procurement will assist the council in fulfilling this duty.
(ix)	Consideration of Public Services (Social Value) Act 2012	See Section 8 below.
(x)	Any staffing implications, including TUPE and pensions.	See section 7.0 below.
(xi)	The relevant financial, legal and other considerations.	See sections 4.0 and 5.0 below.

- 3.7 The current contract with Interactive Intelligence expires on 31st March 2015. It is possible that the successful tenderer will be proposing to supply the solution using the services of Interactive Intelligence. It is also possible that the successful tenderer will be proposing a different solution. In these circumstances, the implementation timescales would risk significant disruption to the service at what is a very busy time for customer contact, as it is the time when Council Tax bills are received by customers, and the charging for green waste collection will also be being initiated. It is therefore proposed that, if a new system is to be implemented, the current service is extended for six months until 30th September 2015, through the award of a contract to Interactive Intelligence. This will allow for the new system to be implemented at a time when the impact of any disruption will be significantly lower, and will also allow for a longer lead in period which will ensure a high quality, thoroughly tested implementation. The cost of the current contract is approximately £75k per annum.

The Cabinet is asked to give its approval to these proposals as set out in the recommendations and in accordance with Standing Order 89.

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4.0 Financial Implications

- 4.1 The estimated value of this contract is £75k per annum for a period of 3 years plus two optional 1 year extensions.
- 4.2 It is anticipated that the cost of this contract will be funded from existing revenue budgets for the maintenance of the existing ACD solution.

5.0 Legal Implications

- 5.1 The proposed contract is for a managed telecommunications software and maintenance service. Therefore, the proposed contract is classified as a Part A (category 5) services contract under the Public Contracts Regulations 2006 (as amended) (the “EU Regulations”). In addition, the estimated value of the proposed contract is likely to be above the EU threshold for Services (currently £172,514); therefore the procurement process is subject to the full application of the EU Regulations. The proposed contract is classified as a Medium Value Contract under the Council’s Contract Standing Orders and Financial Regulations.
- 5.2 Ordinarily, for Medium Value Contracts, Chief Officer approval to award the proposed contract would be sought; however Officers have thought it prudent to seek the prior approval of the Council’s Cabinet with regards to the pre-tender considerations set out in the table at paragraph 3.6 above and the shortlisting, invitation of tenders and subsequent evaluation.
- 5.3 Once the tendering process is undertaken Officers intend to report back to Cabinet, explaining the process undertaken in tendering the contracts and recommending award.
- 5.4 Call off contracts concluded off a framework do not have to include provision for a standstill period, as this would have been observed by the procuring Contracting Authority (in this case the Crown Commercial Services) prior to appointing contractors onto the Framework. Members will note that Officers are intending to observe a voluntary standstill period of a minimum of 10 calendar days. The requirements of a standstill period includes notifying all tenderers in writing of the Council’s pending decision to award and providing additional debrief information to unsuccessful tenderers on receipt of a written request. The standstill period provides unsuccessful tenderers with an opportunity to challenge the Council’s award decision if such challenge is justifiable. However if no challenge or successful challenge is brought during the period, at the end of the standstill period the Council can issue a letter of acceptance to the successful tenderer and the contract may be formally entered into, should Members decide to approve the award recommendations.

- 5.5 Further, Officers are seeking a waiver from Contract Standing Orders and Member approval for a direct award of a short-term interim contract to the incumbent contractor, for the reasons set out in paragraph 3.7 citing good operational and/or financial reasons for doing so. The value of the proposed interim contract to the incumbent contractor is likely to be classified as a Low Value Contract under the Council's Contract Standing Orders and as such would ordinarily require at least three written quotations. However, for the reasons set out in the body of this report the award of the proposed interim contract, should Members be minded to approve, would seem reasonable and justified considering the need for Officers to mitigate risk in disruption to the service.

6.0 Diversity Implications

- 6.1 As part of the process Officers would ensure that any diversity implications relating to service delivery are considered and addressed in any proposed solution.

7.0 Staffing/Accommodation Implications

- 7.1 There are no implications for council staff arising from re-procuring the proposed contract.
- 7.2 In view of the nature of the service delivery model with contractors able to provide a service from any location, it is not considered appropriate to require the London Living Wage as part of the contract terms. In any event, salaries and wages within the IT industry are generally above the level of the LLW.

8.0 Public Services (Social Value) Act 2012

- 8.1 Since 31 January 2013, the council, in common with all public authorities subject to the EU Regulations, has been under duty pursuant to the Public Services (Social Value) Act 2012 to consider how the services being procured might improve the economic, social and environmental well-being of its area; how, in conducting the procurement process, the council might act with a view to securing that improvement; and whether the council should undertake consultation. This duty applies to the procurement of the proposed contract as Part A Services over the threshold for application of the EU Regulations are subject to the requirements of the Public Services (Social Value) Act 2012.
- 8.2 There is a limited market for the delivery of these services; however, officers will endeavour to describe the scope of service in such a way as to further meet the requirements of the Act during the procurement process as well as ensuring that contractors responses address issues of social value.

9.0 Background Papers

9.1 None Applicable

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CONRAD HALL
Chief Finance Officer

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 Brent	Cabinet 13 October 2014 Report from the Chief Finance Officer
For Action Wards Affected: ALL	
Authority to award contract for Revenues and Benefits and Housing Software	

Appendix 1 is Not for Publication

1.0 Summary

- 1.1 This report requests authority to award a contract as required by Contract Standing Order No 88. This report summarises the process undertaken in procuring this contract and recommends to whom the contract should be awarded.

2.0 Recommendations

- 2.1 That Members award the contract for Revenues and Benefits and Housing Software to Northgate Information Solutions UK Limited (Northgate).

3.0 Detail

Background

- 3.1 The Council has a requirement for software for the administration of Revenues and Benefits and Housing Management Services.
- 3.2 The current contract for this software is with Northgate and expires on 30th April 2014. In July 2014 Cabinet agreed a recommendation to invite tenders for a new contract commencing 1st May 2015 to succeed this arrangement.

- 3.3 The July report anticipated that there would be a cost of change in implementing a new system, but that this would generate revenue savings, offsetting the cost of purchasing and implementing a new system over a 2 to 3 year period. It also noted that there would be a risk of business disruption, and costs to the council arising from the implementation, including those due to a loss of productivity whilst staff familiarise themselves with a new system. There would also be costs arising from the use of procurement and service staff resources during the tender process. It was difficult to estimate the scale of these costs without further procurement discussions with the market in order to understand their likely implementation methodologies.
- 3.4 The continued use of the Northgate system is the recommended option, as it will avoid the risk of the business disruption which may occur with the implementation of a new system, at a time when there are other changes in customer access being made. It is essential that the Council is able to continue to administer its revenues and benefits and housing functions effectively and efficiently. In order to continue the use of the system, a contract for maintenance and support is required, and as this is a function that Northgate has exclusive rights to provide, it is proposed that the contract be awarded to them.

The award

- 3.5 After further consideration, officers are now recommending that the council continues to use the current software provided by Northgate, and awards a new contract for the support and maintenance of that software to them. It is considered that this way forward will represent the best value for money for the council.
- 3.6 Further detail relating to this decision is set out in Appendix 1.
- 3.7 The contract will commence on 1st May 2015 and will continue for a five year term.
- 3.8 It is possible that during the five year term there will be legislative changes as part of the Welfare reform that will lead to a requirement for fundamental changes in the software used. The terms of the new contract will ensure that there is sufficient flexibility to accommodate this.

4.0 Financial Implications

- 4.1 The Council's Contract Standing Orders state that contracts for supplies and services exceeding £250k or works contracts exceeding £500k shall be referred to the Cabinet for approval of the award of the contract.
- 4.2 The estimated value of this contract over the five year period is over this threshold.

- 4.3 The cost of this contract can be contained within existing revenue budgets for the maintenance of the Revenues and Benefits and Housing Software.

5.0 Legal Implications

- 5.1 The value of this contract over its the lifetime is higher than the EU threshold for Services and the award of the contracts therefore is governed by the Public Procurement Regulations 2006 (the “EU Regulations”). The award is subject to the Council’s own Standing Orders in respect of High Value contracts and Financial Regulations.
- 5.2 Whilst the contract is subject to full application of the EU Regulations, Regulation 14 (1)(a)(iii) of the EU Regulations does permit a contracting authority to use a negotiated procedure without the prior publication of a contract notice when, for technical or artistic reasons, or for reasons connected with the protection of exclusive rights, the public contract may only be awarded to a particular economic operator. Paragraph 3.4 details Officer’s reasons why for technical and for the protection of exclusive rights the Council is justified in using a negotiated procedure under Regulation 14 (1)(a)(iii).
- 5.3 The estimated value of the contract is above the Council’s Standing Orders threshold for High Value Service Contracts (of £250k), and the procurement and award of the contract is consequently subject to the Council’s own Standing Orders and Financial Regulations in respect of High Value contracts. High Value contracts are subject to formal tendering procedures but Contract Standing Order 86 (e)(i) provides that subject to complying with EU Regulations, contracts are not subject to full tendering requirements:

“where for technical or artistic reasons, or for reasons connected with the protection of exclusive rights, the services, supplies or works may only be provided by a particular provider or where there is only one provider who would be able to provide the services, supplies or works, PROVIDED that advice is sought from the Director of Legal and Procurement and in the case of High Value Contracts approval is sought from the Cabinet (or if appropriate, the General Purposes Committee);”

As indicated above, paragraph 3.4 details reasons why for technical and for the protection of exclusive rights Officers consider that full tendering is not appropriate following liaison with the Director of Legal and Procurement. Officers seek approval pursuant to Contract Standing order 88 to award the contract to Northgate.

- 5.4 In accordance with the EU Regulations, the Council is required to publish a Contract Award Notice following the award of the contract.

6.0 Diversity Implications

- 6.1 No implications as this contract will be for a continuation of the use of the existing system.

7.0 Staffing/Accommodation Implications (if appropriate)

- 7.1 No implications as this contract will be for a continuation of the use of the existing system.

8.0 Background Papers

- 8.1 July Cabinet report "Revenues, Benefits and Housing Software Acquisition".

Contact Officers

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Chief Finance Officer

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

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MINUTES OF THE SCRUTINY COMMITTEE Tuesday 9 September 2014 at 7.00 pm

PRESENT: Councillor A Choudry (Chair), Councillor Colwill (Vice-Chair) and Councillors Daly, R Patel (attending for Councillor Van Kalwala) W Mitchell Murray, Oladapo Southwood and Thomas (attending for Councillor Allie), together with Mr Alloysius Frederick, and appointed observer, Lesley Gouldbourne.

Also Present: Councillors Perrin and Aden, Butt, Hector, Hirani, Kabir, McLennan and Filson

Apologies were received from: Councillors Allie and Van Kalwala , Co-opted Member Dr J Levison and appointed observers Jenny Cooper and Chrissy Jolinon

EXTRACT

1. Parking Services Update

Michael Read (Operational Director, Environment and Protection) introduced a report to the committee updating members on the delivery of parking services. He explained that in September 2012, the Executive had agreed to make a raft of changes to the service to modernise delivery, reduce expenditure and provide a platform for future efficiencies. Key to these changes was the development of a new online parking permit database designed to facilitate access to the service via telephone, text and the council's website, whilst removing counter services. These changes posed no difficulties for adequately capturing the data required for residents' permits but it was recognised that substantial changes would be required for visitor parking which had operated using scratch-card permits. It had subsequently been agreed that a virtual visitor permit system be implemented and this had been built into the contract specification put to the market. The contract had been awarded to Serco with anticipated savings for the council of up to £850k per annum, predicated on the reduction of Civil Enforcement Officers permitted by the introduction of virtual permit system.

Michael Read acknowledged that there had been significant problems with the initial implementation of the new system and described the work that had been undertaken to address these issues. The committee heard that initial capacity issues for the call centre had led to long call waiting times and a high rate of call abandonment. Members' attention was drawn to the table at paragraph 5.3 of the report, detailing improvements in call centre performance. Michael Read highlighted that the call abandonment rate had reduced from 26.3 per cent between July and September 2013 to 1.7 per cent between April and June 2014. The average call waiting time had also reduced from 4 minutes 27 seconds to 39 seconds over the same period.

During the subsequent discussion the Committee emphasised that many elderly and vulnerable residents had reported that they had experienced significant difficulties attempting to use the new system. Many of these residents were not computer literate, nor au fait with mobile phone technology and given the difficulties and cost implications associated with registering visitor permits via the call centre, faced significant barriers to accessing the system. Members also noted that the system relied upon residents having the car registration details of a visitor in advance of the visit or being able to quickly arrange the permit on arrival. The committee expressed strong concerns that vulnerable residents who relied upon regular visits from friends, relatives and carers, could become isolated as a consequence of being unable to use the new permit system. Members noted that there had been numerous requests for alternatives to virtual permits to be considered and queried what action had been taken in response. The committee also queried how long a resident had to register a visitor's car, before a parking ticket could be issued to the vehicle. Further questions were raised regarding the cost to residents of calling the permit service and whether customer feedback from elderly residents had improved since the initial difficulties. The committee queried the savings made by replacing scratch-cards with the virtual permit system. Members also commented upon errors made in relation to Controlled Parking Zones (CPZ) for resident permits and the importance of keeping the council's website up to date, noting that the date for final usage of the scratch-card visitor permit was no longer correct.

The committee then questioned whether it was legal for CCTV cameras, installed for community safety reasons, to be used to issue parking tickets. Councillor Thomas advised that the use of these cameras had caused particular difficulties in the High Street in Harlesden, where ill planned road works had left businesses without appropriate loading bays, thereby forcing deliveries to be made in areas where parking was prohibited. Councillor Thomas invited Michael Read and Sue Harper to view the difficulties caused at the High Street in Harlesden in person. A query was then raised regarding the length of time that was considered reasonable to stop in areas where parking was restricted before a ticket was issued by cameras. Concerns were expressed regarding inappropriate use of CCTV vehicles by officers and it was highlighted that reports of these being dangerously parked had been received. Members questioned what monitoring arrangements were in place to ensure that CCTV vehicles were used correctly.

At the invitation of the Chair, Councillor Hector addressed the committee to advise that residents with English as second language had also experienced difficulties accessing the parking permit system.

Responding to the queries raised, Michael Read advised that alternative measures to support residents in accessing the parking permit service had been explored. As a consequence of this work, a Cared-For permit would be soon be introduced. This would be a physical permit that could be displayed in a carer's car, then returned to the resident at the end of the visit. The use of a physical permit in these circumstances would not affect the overall operation of the system as it would only apply to a very small proportion of users. The option to have up to two 'trusted phone numbers' had been introduced for those who had been unable to use the phone or text service. This enabled a resident to nominate two people who would be able to authorise visitor permits on their behalf. He further explained that an Equalities

Impact Assessment (EIA) had been completed in 2012 when developing the new strategy for delivering parking services in Brent. The EIA had identified that residents who had difficulty accessing or using a computer would be adversely affected by the proposed changes. In response to the EIA, options to access the service via telephone or text message had been added. The council was currently working with the contractor to extend automatic answering to enable a twenty-four hour telephone option to be available from late Autumn 2014. The EIA was currently being revised and if continued access issues were identified, officers would explore how the current system could be adapted to address these. Michael Read emphasised that feedback from customers had indicated that many people had found that their needs had been met by the trusted-numbers option, or that they had simply needed some initial assistance understanding how to use the new system.

Michael Read further advised that calls to the service were charged at a local rate for landlines and at the standard charge for mobile phones. Civil Enforcement Officers were required to wait for approximately 5 minutes before issuing a ticket to an offending vehicle to allow time for visitor registration. The savings made by the council by moving to virtual visitor permits was approximately £500k a year, though it was difficult to separate these savings from those achieved overall. Michael Read acknowledged the issues regarding CPZ and advised that these had been addressed in the report before the committee. He accepted that it was important to ensure that the council's website was kept up to date but advised that he would be proposing to Cabinet that there be no deadline for use of the remaining scratch-cards visitor permits held by residents.

Addressing the committee's queries regarding the use of CCTV cameras, Michael Read advised that the council's use of these to issue Penalty Charge Notices (PCNs) was lawful and explained that permission had been sought from the Department of Transport. There had been errors made by the Council in relation to the difficulties caused by the contractor undertaking work in the High Street in Harlesden. However, the council had cancelled a number of the PCNs issued where there was evidence of loading and unloading taking place. It was clarified that CCTV vehicles were permitted to park in areas where parking was prohibited if there was no other alternative to capture footage of the offences; however, at no time should a CCTV vehicle be parked in such a way as to cause danger to pedestrians or other road users. The council investigated any allegations of misuse of the vehicles and took disciplinary action where appropriate. The council had worked with Serco to ensure that staff understood their legal responsibilities and did not cause reputational damage to the council. Michael Read explained that this issue would become defunct as legislation was forthcoming to prevent local authorities from using CCTV to issue PCNs, except in very limited circumstances.

The committee welcomed the work being undertaken to revise the current EIA and sought details of the timeline for completion and the contribution members would be invited to make. It was suggested that consideration be given to lengthening the period allowed before a PCN could be issued, in light of some of the difficulties reported by residents. Members highlighted the importance of training for Civil Enforcement Officers and reiterated concerns regarding the use of CCTV cameras to issue PCNs, particularly where they had been installed for community safety

purposes. A view was put that the council should not wait for legislation to be enacted before ceasing to use CCTV to issue PCNs.

Michael Read advised that the EIA would be completed over the next few months. He invited members to report any examples of customer experiences of the Parking Permit Service and agreed to look into whether the period allowed before a PCN was issued could be extended.

The Chair highlighted that the committee had unanimously expressed concerns that the current functioning of the visitor parking arrangement was far from adequate. He emphasised the feeling of the committee that there was overwhelming evidence of public dissatisfaction with the existing system, drawn from the level of complaints made directly to councillors, and proposed that Cabinet be advised to reappraise the visitors parking arrangements, taking into account the serious concerns expressed by members and residents. The committee agreed with the Chair's proposal.

The Chair thanked Michael Read and Councillor Perrin for attending the meeting.

RESOLVED:

That Cabinet be requested to reappraise the existing arrangements for visitor parking permits, taking into account the serious concerns expressed by the Scrutiny Committee and members of the public.