Public Document Pack



Cabinet

Monday 20 July 2020 at 4.00 pm

This will be held as an online virtual meeting

The link to view this online meeting is available by clicking HERE

Membership:

Lead Member Portfolio Councillors:

M Butt (Chair) Leader of the Council

McLennan (Vice-Chair) Deputy Leader of the Council and Lead Member for

Resources

Agha Lead Member for Schools, Employment and Skills

Farah Lead Member for Adult Social Care

Hirani Lead Member for Public Health, Culture & Leisure
Miller Lead Member for Community Safety and Engagement
M Patel Lead Member for Children's Safeguarding, Early Help

and Social Care

Krupa Sheth Lead Member for Environment

Southwood Lead Member for Housing & Welfare Reform

Tatler Lead Member for Regeneration, Property & Planning

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

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

The press and public are welcome to attend this as an online virtual meeting. The link to attend and view the meeting is available <u>HERE</u>.



Notes for Members - Declarations of Interest:

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

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

If the Personal Interest is also significant enough to affect your judgement of a public interest and either it affects a financial position or relates to a regulatory matter then after disclosing the interest to the meeting the Member must leave the room without participating in discussion of the item, except that they may first make representations, answer questions or give evidence relating to the matter, provided that the public are allowed to attend the meeting for those purposes.

*Disclosable Pecuniary Interests:

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

**Personal Interests:

The business relates to or affects:

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

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A decision in relation to that business might reasonably be regarded as affecting the well-being or financial position of:

- You yourself;
- a member of your family or your friend or any person with whom you have a close association or any person or body who is the subject of a registrable personal interest.

Agenda

Introductions, if appropriate.

Item Page

1 Apologies for Absence

2 Declarations of Interest

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

3 Minutes of the Previous Meeting

1 - 4

To approve the minutes of the previous meeting held on 15 June 2020 as a correct record.

4 Matters Arising (if any)

To consider any matters arising from the minutes of the previous meeting.

5 Petitions (if any)

To discuss any petitions from members of the public, in accordance with Standing Order 66.

6 Reference of item considered by Scrutiny Committees (if any)

There are no reference reports from either of the Council's Scrutiny Committees for consideration at this meeting.

Chief Executive's reports

7 Poverty Commission

Deferred

This report provides an overview of the findings of the Poverty Commission chaired by Chaired by Lord Richard Best, and outlines the draft emerging recommendations.

Pre meeting Update: Members are asked to that this item has been deferred for consideration at the Cabinet meeting on 7 September 2020.

Ward Affected: Lead Member: Lead Member for Housing and Welfare Reform (Councillor Eleanor Southwood)

Contact Officer: Shazia Hussain, Assistant

Chief Executive Tel: 07436 702383

shazia.hussain@brent.gov.uk

Digital and Customer Services reports

8 **COVID-19 Support Fund**

5 - 24

This report seeks approval for a proposal to introduce two new support funds using the surplus money from the Council Tax: COVID-19 Hardship Fund 2020-21.

Ward Affected: Lead Member: Deputy Leader (Councillor

Margaret McLennan) All Wards

> Contact Officer: Asha Vyas, Head of Customer Access, Management (Customer Services)

Tel: 020 8937 2705 asha.vyas@brent.gov.uk

9 **Council Tax 13A Policy**

25 - 60

This report seeks to provide background on the Council's policy of the use and exercise of its discretion under section 13A(1)(c) of the Local Government Finance Act 1992 and details of a new discretionary relief policy under the same act.

Ward Affected: **Lead Member**: Lead Member for Housing & All Wards

Welfare Reform (Councillor Eleanor Southwood)

and Deputy Leader (Councillor Margaret

McLennan) &

Contact Officer: Peter Cosgrove, Head of

Revenues and Debt Tel: 020 8937 2307

Peter.Cosgrove@brent.gov.uk

Regeneration and Environment reports

10 Parking Policy 2020

61 - 134

This report seeks approval for the Parking Policy 2020, superseding the 2015 Parking Strategy. The Policy sets out the Council's agreed current policies relating to Parking, updated to reflect agreed changes from November 2015 through to March 2020.

Ward Affected: **Lead Member**: Lead Member for Environment

(Councillor Krupa Sheth) All Wards

Contact Officer: Gavin F Moore, Head of

Parking and Lighting

11 **Heat Billing & Metering Methodology**

135 - 144

This report seeks approval for the proposed methodology for billing residents for heating and hot water at residential properties which are metered for heat to meet Council objectives and ensure compliance with the Heat Networks (Metering and Billing) Regulations 2014.

Ward Affected: Lead Member: Deputy Leader (Councillor

All Wards Margaret McLennan)

Contact Officer: Francesca Campagnoli.

District Energy Network Manager,

Tel: 020 8937 3772

Francesca.Campagnoli@brent.gov.uk

Community Well-being reports

12 **Estate Parking**

145 - 200

This report seeks approval for a proposal to introduce Off Street Controlled Parking (OSCP) through Traffic Management Orders on land owned by the Council within its Housing Revenue Account. The report also sets out two options for a parking enforcement service setting out different approaches to the management of the OSCP. The proposal is informed by recommendations from a commissioned review carried out by parking consultants.

Ward Affected: Lead Member: Lead Member for Housing and

Welfare Reform (Councillor Eleanor Southwood) All Wards

Contact Officer: Emily-Rae Maxwell, Housing

Partnerships Manager Tel: 020 8937 1131 Emily-Rae.Maxwell@brent.gov.uk

13 6 monthly update and procurement reports on NCHP

201 - 220

This report provides an update on progress made towards delivering against the Council's housing targets over the five year period (2019 -2024). This report also provides a summary of the additional developments being assessed and progressed, with an indication of key issues, practical considerations and steps being taken moving forward.

Ward Affected: **Lead Member**: Lead Member for Housing and All Wards

Welfare Reform (Councillor Eleanor Southwood)

Contact Officer: John Magness, Head of

Housing Partnerships Tel: 020 8937 3272

Chief Executive's reports (continued)

14 2019/20 Financial Outturn Report

221 - 236

This report sets out the 2019/20 outturn position against the revenue budget.

Ward Affected: Lead Member: Deputy Leader (Councillor

All Wards Margaret McLennan)

Contact Officer: Minesh Patel, Director of

Finance

Tel: 020 8937 4043

minesh.patel@brent.gov.uk

15 Quarter 1 Financial Report 2020/21

237 - 254

This report sets out the current forecasts of income and expenditure against the budget for 2020/21 and other key financial data.

Ward Affected: Lead Member: Deputy Leader (Councillor

All Wards Margaret McLennan)

Contact Officer: Minesh Patel, Director of

Finance

Tel: 020 8937 4043

minesh.patel@brent.gov.uk

16 Medium Term Financial Outlook

255 - 290

This report outlines the financial position of the Council and seeks approval for the proposed budget setting strategy for 2021/22.

Ward Affected: Lead Member: Deputy Leader (Councillor

All Wards Margaret McLennan)

Contact Officer: Minesh Patel, Director of

Finance

Tel: 020 8937 4043

minesh.patel@brent.gov.uk

17 Q4 Performance Report 2019/20

291 - 328

This report and the performance scorecard (Appendix A) set out the position on the Council's performance in the fourth quarter of 2019/20.

Ward Affected: Lead Member: Deputy Leader (Councillor

All Wards Margaret McLennan)

Contact Officer: Pascoe Sawyers, Head of

6

Strategy and Partnerships Tel: 020 8937 1045 pascoe.sawyers@brent.gov.uk

18 Exclusion of Press and Public

No items have been identified in advance of the meeting that will require the exclusion of the press or public.

19 Any other urgent business

Notice of items to be raised under this heading must be given in writing to the Head of Executive and Member Services or his representative before the meeting. Any decisions taken urgently under this heading must comply with the provisions outlined in paragraph's 12 and 39 of the Council's Access to Information Rules (part 2 of the Constitution).

Date of the next meeting: Monday 17 August 2020





LONDON BOROUGH OF BRENT

MINUTES OF THE CABINET Held as an online virtual meeting on Monday 15 June 2020 at 4.00 pm

PRESENT: (In remote attendance) Councillor M Butt (Chair), Councillor McLennan (Vice-Chair) and Councillors Agha, Farah, Hirani, Miller, M Patel, Krupa Sheth, Southwood and Tatler

1. Apologies for Absence

Apologies for absence were received from Carolyn Downs (Chief Executive).

2. Declarations of Interest

None.

3. Minutes of the Previous Meeting

RESOLVED that the minutes of the previous meeting held on Thursday 28 May be approved as an accurate record of the meeting.

4. Matters Arising (if any)

None.

5. **Petitions (if any)**

None.

6. Reference of item considered by Scrutiny Committees (if any)

None.

7. Brent Tenancy Strategy and Tenancy Management Policy

Councillor Eleanor Southwood (Lead Member for Housing and Welfare Reform) introduced the report detailing the recent review of the Tenancy Strategy which set out expectations for all landlords in the borough, as well as the production of a Tenancy Management Policy which reaffirmed the Council's commitment to its own tenants. It was felt that the new provisions outlined in the documents provided tenants with a greater degree of certainty and security, which was welcomed by all members.

Cabinet noted that the documents had been subject to consultation, with the report highlighting the outcome and how the feedback gained from all stakeholders throughout the development process had assisted to shape both the Strategy and Management Policy. In terms of key changes to the way in which the Council managed its own tenancies, members noted these included the ending of fixed-term tenancies and replacing them with life time tenancies, the introduction of demoted tenancies to tackle anti-social behaviour where necessary and the offering of joint tenancies to cohabiting couples. Assurance was also provided in relation to frequency of the tenancy audits being conducted to review and assess tenants' needs.

Having noted minor amendments to the wording of recommendations 2.1 and 2.3 in the report, it was **RESOLVED** that Cabinet:

- (1) note the duty placed on the Council by the Localism Act 2011 to produce and publish a Tenancy Strategy.
- (2) note and approve the content of the draft Tenancy Strategy.
- (3) note and approve the content of the draft Tenancy Management Policy.

8. Local Authority Discretionary Grant Fund

Councillor Shama Tatler (Lead Member for Regeneration, Property and Planning) introduced the report seeking approval to the arrangements and criteria for administering the Local Authority Discretionary Grants Scheme. Members were advised that the scheme had been established as part of the Governments response to Covid-19 in order to provide a mechanism for supporting small businesses outside the scope of the original Covid-19 business grant schemes, with the amount of funding provided for Brent totalling £3.3million.

Cabinet noted the mandatory criteria set by the Government along with the discretionary criteria, which the Council had the ability to consider and apply, as detailed in section 4 of the report with the proposal to offer a single tier grant of £5,000 per business. Whilst it was felt this would provide the best balance between breadth and impact members recognised that the overall level of funding available was likely to cover business seeking to apply and as a result it was noted that lobbying of Government on the support being made available matter would need to continue.

In commenting on the criteria, members were keen to ensure that the distribution of funding was undertaken as quickly as possible recognising the need, at the same time, for the necessary checks to be completed to ensure businesses met the relevant eligibility criteria. It was also confirmed that businesses who had received alternative business support grants (other than access to the furlough scheme) would not be eligible to apply.

RESOLVED that Cabinet:

(1) approve the Local Authority Discretionary Grants Scheme for Brent as set out in this report, using the eligibility criteria specified in sections 4.2, 4.6, and 4.11 of the report and agreeing a single tier grant payment of £5,000.

Cabinet - 15 June 2020 Page 2

(2) delegate to the Strategic Director of Regeneration and Environment the administration and award of grants under the Local Authority Discretionary Grants Scheme.

9. Exclusion of Press and Public

There were no items that required the exclusion of the press or public.

10. Any other urgent business

None.

The meeting ended at 4.20 pm

COUNCILLOR MUHAMMED BUTT Chair



Agenda Item 8

Brent

Cabinet 20 July 2020

Report from Strategic Director, Customer and Digital Services

Financial Inclusion: COVID-19 Support Fund

Wards Affected:	All
Key or Non-Key Decision	Key
Open or Part/Fully Exempt:	Open
No. of Appendices:	Appendix 1: Poverty Commission Feedback Appendix 2: Interest Free Loans Eligibility Criteria
Background Papers	None
Contact Officers:	Asha Vyas Head of Customer Access Tel: 020 8937 2705 Asha.Vyas@brent.gov.uk Leigh Wood Service Manager Benefits Subsidy and Policy Tel: 020 8937 1948 Leigh.Wood@brent.gov.uk Charlotte Moore Senior Transformation Officer Tel: 020 8937 4177 Charlotte.Moore@brent.gov.uk

1.0 Purpose of the Report

- 1.1 In May 2020 a cross-council group was convened to look at the impact of COVID-19 on Financial Inclusion in Brent and develop solutions to address the issues arising in response to the pandemic. The group included Officers from Brent Community Hubs, the Children and Young People Directorate, Employment Skills and Enterprise, Customer Access, Strategy and Partnerships and Housing and Neighbourhood Services.
- 1.2 This report outlines a proposal that arose from the group, which is to introduce two new support funds using the surplus money from the Council Tax: COVID-19 Hardship Fund 2020-21 and seeks cabinet approval to such proposals. The proposals include:
 - 1. A grant facility delivered by the Council
 - 2. An interest free loan administered by a Credit Union

2.0 Recommendations

That Cabinet:

- 2.1 Note the proposals set out in sections 5 and 6 of this report to introduce two new support funds using the surplus money from the Council Tax: COVID-19 Hardship Fund 2020-21.
- 2.2 Approve the establishment of a grant facility to assist Brent residents financially impacted by Covid-19 as set out in section 5 of the report ("Covid-19 Support Fund Grant").
- 2.3 Delegate to the Strategic Director for Customer Services in consultation with the Cabinet Member for Housing and Welfare Reform authority to agree eligibility criteria for the Covid-19 Support Fund Grant above and thereafter administer and award grants.
- 2.4 Approve the establishment of an interest free loan arrangement to assist Brent residents financially impacted by Covid-19 as set out in section 6 of the report ("Covid-19 Support Fund Loan").
- 2.5 Approves payment to the Credit Union of such sums remaining in the Council Tax COVID 19 Hardship Fund 2020 21 and at such frequency as the Director of Finance considers appropriate from which Covid-19 Support Fund Loans will be made and delegates to the Director of Finance in consultation with the Director of Legal, HR, Audit and Investigations authority to finalise the terms of the investment.
- 2.6 Delegate to the Strategic Director for Customer Services in consultation with the Cabinet Member for Housing and Welfare Reform authority to agree final eligibility criteria based on draft eligibility criteria in Appendix 2 for the Covid-19 Support Fund Loan and thereafter administer it in association with the Credit Union.
- 2.7 Delegate to the Strategic Director for Customer Services in consultation with the Cabinet Member for Housing and Welfare Reform authority to review and agree revised eligibility criteria for both the Covid-19 Support Fund Grant and the Covid-19 Support Fund Loan for the reasons detailed in paragraphs 5.16 and 6.19.

3.0 Source of funding

- 3.1 The Ministry of Housing Communities and Local Government (MCHLG) has paid each Local Authority under the Council Tax: Covid-19 Hardship Fund 2020 to 2021 Local Authority Guidance an amount of money, with the "strong expectation" that this will be used to credit £150 to the Council Tax liabilities to all Working Age Council Tax Support Customers, where the liability is not already nil.
- 3.2 Brent's allocation is £3.9 million.

- 3.3 Brent's new Council Tax Support scheme award pays 100% to a relatively large proportion of the Working Age tax base already. Modelling suggests that after £150 has been paid to all current and future liabilities in 20/21, there will be approximately £2.6 million remaining in this fund. That said the amount spent is expected to increase, as more residents are likely to apply for Local Council Tax Support (LCTS) in the current COVID-19 climate.
- 3.4 The Government guidance is that having allocated payments to reduce the council tax bill of working age LCTS recipients by £150, billing authorities should establish their own local approach to using any remaining grant to assist those most in need, and to revisit this broader approach at intervals during the financial year, in order to ensure expenditure for 2020-21 remains within the allocation.
- 3.5 The Council is free to use this additional money to meet the needs of local residents who have been affected by the virus outbreak, though there are two immovable factors that must be considered:
 - Any monies paid out must be to support individuals or households affected by the virus outbreak.
 - The fund must be spent by 31st March 2021. In deciding on how we will spend this money, we should consider the long-term effects of the virus outbreak and how we can support people into 2021/22 and beyond, albeit with payments made to them by the end of this financial year. An Office of Budget Responsibility (OBR) forecast published in May 2020, suggests there will be a national 92% increase in unemployment by March 2021 and that the effects of the economic downturn could be felt until 2024.
- 3.6 Paragraph 19 of the "Council Tax COVID-19 hardship fund 2020-21 Local Authority Guidance" document, which was issued by the Ministry for Housing, Communities and Local Government in March 2020, states as follows:

"Having allocated grant to reduce the council tax bill of working age LCTS (Local Council Tax Support Scheme) recipients by a further £150, billing authorities should establish their own local approach to using any remaining grant to assist those in need. Billing authorities will want to revisit their broader approach at intervals during the financial year, in order to ensure expenditure for 2020-21 remains within their allocation. In determining any broader approach to delivering support, authorities are best placed to reflect on the financial needs of their most vulnerable residents. In doing so, they may wish to consider using their remaining grant allocation as part of wider local support mechanisms. These may include. but are not restricted

- Council tax relief using existing discretionary discount/hardship policies (adapted where necessary in order to capture those most likely to be affected by COVID-19); and
- b. Additional support outside the council tax system through Local Welfare or similar schemes;
- c. A higher level of council tax reduction for those working age LCTS recipients whose annual liability exceeds £150."

4.0 Current Financial Context

- 4.1 The government has introduced a number of national schemes to protect individual's income and help those who may be facing financial hardship due to COVID-19. These include:
 - The Coronavirus Job Retention Scheme and Self-Employed Income Support Scheme
 - Repayment holidays for mortgage, personal loans and other credit products
 - Pause on debt enforcement, housing possessions and evictions
- 4.2 Despite these measures, Citizen's Advice estimate that approximately 9% of the national population has fallen behind on one or more household bills, and that 30% of adults have had a 20% or more decrease in their income due to Coronavirus. It is estimated that the financial impact of the virus will disproportionately affect those with health risks, adults under age 40, and those in insecure work¹. When the government support measures end, it is expected that the number of people facing financial hardship will increase.
- 4.3 In April 2020 is was reported that the UK economy shrank by 20.4%, which is the largest monthly contraction on record and three times greater than the decline seen during the 2008 2009 economic downturn².
- 4.4 It is reported that 63% of private renters do not have savings, meaning that many have limited resilience in meeting unexpected expenses³. Affordable credit is not always available to people on low income, so many will turn to high-interest 'pay-day' loans to meet unexpected financial shortfalls, which in turn can contribute to the cycle of indebtedness. In 2018 it was reported that 17% of London's population were over-indebted⁴. The most-extreme impact of these types of debt can result in evictions and homelessness.
- 4.5 In Brent, 1,215 residents have contacted the Council to inform that they are struggling to pay their Council Tax bill due to Coronavirus. To support the whole tax-paying base, as well as the additional £150 for Council Tax Support customers, the newly approved S13a scheme is available.

Table 1. Number of new Universal Credit claims in Brent

UC Claims	12 March	14 May	
Wembley	5,428	12,149	
Harlesden	11,837	24,652	
Total	17,265	36,801	

4.6 According to data released by HMRC in early June, Brent has the 2nd highest number of employees furloughed (49,900) compared to other London Boroughs, and the 2nd highest number of residents in receipt of self-employment income support (22,600).

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¹ Citizens Advice, Near the cliff-edge: how to protect households facing debt during COVID-19

² Office for National Statistics, Coronavirus and the impact on the UK economy

³ Joseph Rowntree Foundation, MP's briefing April 2020

⁴ London Assembly, Short Changed: the financial health of Londoners

4.7 Further measures are required to support those impacted by COVID-19 to meet the increased financial pressures. By doing so this will help to limit the long-term impact on individual's mental health, increase confidence in money management, and aid the overall financial recovery of individuals.

5.0 Grants Proposal

- 5.1 It is proposed to establish a grant facility referred to as the Covid-19 Support Fund Grant. The grants made from the Covid-19 Support Fund Grant will be delivered by colleagues across Brent in Customer Access, Housing, and the Community Hubs. Decisions will be made at these first points of contact. An eligibility criteria is being developed and will include the need for those accessing grant funding to be Brent residents financial impacted by COVID-19, and a simple means test which is likely to include a capital disregard sum in line with other benefits and grants administered by the Council, such as the Council Tax Reduction Scheme.
- 5.2 Feedback has been sought from the Poverty Commission and they are positive about the approach.
- 5.3 Colleagues across Brent were widely consulted and case studies of residents they have helped since the virus outbreak were provided. These case studies are set out below, with a brief explanation of how the fund will help residents where current support mechanisms fall short of remedying the fundamental issues they are facing.

5.4 Parachute payments

5.4.1 Recently unemployed residents may have been able to comfortably afford their expenditure while in secure work, but are no longer able to make ends meet. Such unemployed residents looking for work will receive a payment to ease their financial stress while they are waiting for their first Universal Credit payment or in the event that their first Universal Credit payment is insufficient for all reasonable bills to be paid.

5.5 Training

- 5.5.1 Residents put out of work may need help with retraining, to either refresh their skills or learn new ones.
- 5.5.2 With some forecasts suggesting the possibility of the economic downturn not remedying itself until 2024, the process of supporting residents to gain new skills to improve their chances of finding employment will in the long run increase their ability to pay Council Tax and avoid potential homelessness.
- 5.5.3 Brent Works job and apprenticeship brokerage is working in partnership with Jobcentre Plus and the United Colleges Group to engage employers that are recruiting and to develop a responsive set of courses that help people to retrain and access these opportunities. It is likely that some qualifications will need to be paid for by the job seekers, in which case access to funding for training could be vital to enable them to access work. Support will be offered for unemployed residents as well as those that are under-employed requiring more hours, as well as people seeking to increase their income through better

- quality employment.
- 5.5.4 Funds will be made available to support individual's access to new qualifications that may arise because of COVID-19. For example, training for those in the beauty industry to update their skills and practise in accordance with government guidelines on health and safety.
- 5.6 Rent arrears
- 5.6.1 The Council has the Discretionary Housing Payment scheme to support Housing Benefit claimants with rent costs above their benefit entitlement. However, colleagues in Housing have given examples of rent arrears building up over the last few months for both those entitled to benefits and those who are not. If someone had fallen into rent arrears because of the pandemic situation, an award will be made to cover that as well as looking at the wider circumstances to see if there was any training or apprenticeships the fund will be used to pay for to improve the prospects of that person.
- 5.7 Supporting Digital Inclusion
- 5.7.1 From work with the Community and Voluntary Sector and officers' own interactions with residents, officers already know that the restrictions in place around COVID-19 are magnifying the impacts of digital exclusion. Work with the Young Brent Foundation and Age UK Brent has highlighted that the impact is being felt across generations.
- 5.7.2 Social isolation has been a problem for both younger and older people because of the social-distancing restrictions in place to help manage the COVID-19 outbreak. School closures mean that much learning and support for young people has shifted online. Research has shown that access to a suitable broadband connection can be problematic. Prior to the COVID-19 outbreak, many young people accessed free Wi-Fi in libraries and cafes for example, to do their homework. These options are currently not available to them. Where broadband is available in the home, it needs to be reasonably high speed to support streaming of educational materials, often via video streaming for example, particularly where a number of young people are accessing it at the same time and where parents may also be working from home.
- 5.7.3 A similar need exists amongst some older people. The over 70s have been largely confined to their homes since mid-March. It is envisaged they will be one of the last cohorts to be released from lockdown. Digital exclusion is high amongst older people in normal circumstances. Online access and training could enable excluded and isolated older people to connect with their family and friends. Older people would also be able to access online exercise groups, maintaining their physical health and psychological wellbeing.
- 5.7.4 There is an increasing demand for Council services to replace many face-face interactions with online ones. For example, consultation and action planning events are taking place via Zoom. Some services that might have been accessed in the Customer Service Centre, or by some residents at one of the Hubs, are available online. Brent Start has been offering some of its courses online.

- 5.7.5 As the furlough scheme winds down the impact on employment is already being felt. Residents finding themselves newly unemployed will need online access to apply for jobs, participate in online interviews and upskill online.
- 5.7.6 Brent Start has an extensive digital skills offer that can be provided virtually or in the community when the service re-opens classes from September 2020 (based on current plans and adhering to social distancing guidelines). Residents should be encouraged to utilise this. For those claiming out of work benefits such as Universal Credit, this will be free.
- 5.7.7 All of these uses demand fast and robust connections without data limits. For example, an hour's call on Zoom uses 1GB of data. Brent's Digital Strategy outlines the Council's commitment to improving the Borough's digital infrastructure. Use of some of the Resident Support Fund to support residents with online access presents a real opportunity to accelerate this work in some of the most digitally excluded areas of the Borough.
- 5.7.8 The Children and Young People directorate is already working with schools in Brent to identify families with school-aged children without a broadband connection. This is to allow them to benefit from the new partnership between the Department of Education and BT, which will provide eligible households with a free internet connection for six months. Data will be shared with CYP to avoid duplication.
- 5.7.9 A digital inclusion package will comprise of some, or all of the following elements shown in table 2.

Table 2.

	Est. cost per person 12 mths	Est. cost per person 24 mths
A Chromebook device	£205	£205
Locking down Chromebook to make it easier to use for those that require this	£15	£15
Microsoft Office 365 software package	£80	£160
Gadget Insurance (loss / theft etc.)	£65	£130
Technical support service for residents (based on service used by Age Concern UK Brent)	£240	£480
12 or 24 months 50 mbps broadband connection paid in advance to the provider by the Council. Wherever possible a full fibre connection should be sought	£180	£360
to progress the objectives of the Digital Strategy, however, this will not be possible for all properties, in which case alternative connections will be used.		
(Cost estimates based on a wholesale price for a 50 mbps full fibre connection with providers Brent has wayleave arrangements with, but costs are similar to providing a 4G sim card. If a fixed broadband connection is required in a property not served by providers we've got wholesale agreement with the cost of the connection is likely to be higher at around £360 for 12 mths)		
A digital skills package – this will take the form of £100 to cover the cost of online training, or to be used to fund places on the basic digital skills course offered to Brent Start. These short courses are currently £20 for three hours over two weeks. They cover subjects like how to access online help and information; creating an email account and online job searches.	£100	£100
FULL PACKAGE COST*	£885	£1,450

^{*}Not all residents qualifying for a grant would require each element of the package.

5.8 Reduced reserves

5.8.1 An elderly resident may have had to incur unusual expenditure over the last several weeks, taking more taxis rather than buses or using more expensive online shopping than they would otherwise have done. The average online delivery charge for a food delivery is £5 which – although ostensibly not a huge amount would add up for someone on a limited budget. If a resident could show that their small amount of savings had decreased because of this, a reimbursement will be arranged.

5.9 Council Tax

5.9.1 If a Working Age Council Tax Support ("CTS") claimant needed more than the £150 towards their Council Tax bill, after the credit from the Hardship Fund, a further award could be made. Additionally, awards could be made to Pensioners and Working Age taxpayers not in receipt of CTS. This will be

covered by the Council Tax Discretionary Reduction Policy, which will be considered by Cabinet on 20 July 2020.

5.10 Meeting resident's basic needs

- 5.10.1 Foodbanks have seen a significant increase in referrals throughout the lockdown, a grant could be made to our Foodbanks to support them while they regroup and refresh their stock and infrastructure. A second wave of the virus outbreak, or a double-dip recession, will mean that Foodbanks will need to be as resilient as possible.
- 5.10.2 There are currently only a few places for people to get support in tackling fuel poverty. This includes Shine which is a is a fuel poverty referral network and free energy advice service for Londoners, as well as the Warm Home discount where certain energy companies provide a rebate on energy bills in the winter to residents such as low income pensioners as well as other people on low income.
- 5.10.3 Fuel vouchers via the Trussel Trust can also be accessed by residents with prepayment meter vouchers for gas or electricity, so they do not have to choose between 'heating and eating'. These however are only available by collection at the Trussel Trust foodbank in Neasden and some residents struggle to travel to the site to collect the vouchers.
- 5.10.4 With the potential risk of an increase in cases of COVID-19 in the winter, grant funding will be used to fund additional support for Brent residents in accessing support with fuel payments.
- 5.11 Respite/Support for Young Carers
- 5.11.1 Young Carers, already under pressure in normal times, have had to spend 24/7 caring for family members without the option for respite or support. A payment could be made to such a person should they be able to arrange respite care, for days out or other expenditure relating to their own well-being.
- 5.12 Funding debt advice
- 5.12.1 A grant to a Brent-based money advice agency to fund some debt and budgeting advisors. Based on the assumption that 1.5 FTEs would cost £50k a year, a grant of £100k would fund either three advisors for a year or 1.5 advisors for two years. We would be meeting our obligations to spend the money in this financial year, while ensuring that we have secured support for our residents for at least some of the long-term period in which the virus outbreak will affect our residents.
- 5.12.2 The debt advisors will be employed to engage with anyone struggling to meet their loan repayments, or as a conditional obligation we could apply to some loans or grants to ensure that the grant or loan being arranged will be used sensibly to encourage the long-term stability of that household.

- 5.13 Mortgage support
- 5.13.1 Universal Credit does not support customers with mortgage payments, unlike the legacy scheme whereby the interest on a mortgage could be paid by Job Seekers Allowance. Support towards the interest on repayments will be given.
- 5.14 Counselling
- 5.14.1 Costs of bereavement counselling will be partly or fully met.
- 5.15 Track and Trace
- 5.15.1 Residents may experience a number of financial barriers that prevent them from isolating as part of the government's Track and Trace programme. Grant funding will be made available to supplement the salaries of those who would otherwise not be able to isolate due to the loss of income and the subsequent impact of this on their households.

Figure 1.

Case Study One

The tenant is in rent arrears of £951 but this is historic from water charges rather than rent. As we no longer collect water charges the debt is static but it is the arrangement of paying £10 monthly that the tenant continues to fail on making. Efforts have been made to establish a direct debit but just doesn't seem to come to fruition.

The Officer has written to the DWP numerous times to get a third-party deduction arrangement in place but this has never been implemented and at present the DWP have ceased third party deduction payments due to Covid-19.

The tenant suffers with COPD and will make payments for a few months then drop off again.

All of her rent account otherwise is up to date, but it will take her over 8 years to clear the arrears so will continue to receive letters and potentially Notices' seeking possession without it being cleared.

Case Study Two

Adult A receives ESA and this was stopped on the 2nd March due to him not returning the medical assessment form. He struggles to read his post and does not have a phone. Social worker supported him to contact DWP to try and get the ESA reinstated and have referred him for a support worker to provide support with his ongoing practical issues.

He is not eligible for PIP however suffers from chronic leg ulcers after an accident over 20 years ago. He is a recovering alcoholic and suffers from frailty and therefore does not leave the house very much. He has a friend that visits him to try and support him but due to the state of the property struggles to support him as much as he would like (items not working, smoke stained walls). His flat would really benefit from repainting and replacing some of the items such as curtains, microwave and a new bed. All are nearly 30 years old. He has no disposable income so would not be able to purchase any new items himself as he lives hand to mouth. The flat is owned by Brent Housing but they are not responsible for the furnishings of the property. The assistance would improve his living conditions and wellbeing and also enable a friend that supports him to continue to do so and reduce the need for services in the future.

Figure 3.

Case Study Three

An elderly resident was making frequent travels to a local shop during lockdown, and receiving food parcels arranged by Brent.

It has since been discovered that she needed such frequent food deliveries and purchases as the only freezer she has was a small one at the top of her fridge.

Had she had the means to buy a bigger freezer, she would have been able to store food more readily reducing her reliance on food parcels and the need to venture out.

5.16 Delegated authority is sought for the Strategic Director for Customer Services in consultation with the Cabinet Member for Housing and Welfare Reform authority to agree eligibility criteria. However given the range of situations it is envisaged the Covid-19 Support Fund Grant may assist with going forward, delegated authority is sought for the Strategic Director for Customer Services, to review and agree revised eligibility criteria as and when required.

6.0 Interest Free Loan proposal

6.1 As the virus outbreak and lockdown have advanced, there has been a significant increase in the uptake of Welfare Benefits. In the first weeks following the lockdown 1.5 million claims for Universal Credit were made in a week, rather

than the usual 150,000 (an increase of 1000%). The delay in the first payment of Universal Credit to new claimants, and the inability of that scheme to meet the expenditure of someone recently unemployed for the first time, are well documented.

- 6.2 There is a risk that someone with an impaired credit history who is unable to access bank loans, may be in a position that they turn to a loan shark or payday lender for financial support, with repayment plans that are unrealistic and inflated interest rates.
- 6.3 The LGA have recently called on Government to support Councils in dealing with this. A quote from Cllr Simon Blackburn, Chairman of the LGA's Safer and Stronger Communities Board:

"We know many people are struggling to make ends meet during the coronavirus crisis, but loan sharks should be avoided at all costs. These illegal loans typically come with astronomical interest rates, soon spiral into uncontrollable debt that can never be repaid, and are typically enforced through intimidation and violence.

There are much better, safer and cheaper ways people can manage their money.

Anyone struggling with debt problems can contact their local council or advice provider first, while charities also offer similar services. These will all be focused on offering genuine help in the most affordable way, rather than illegal money lenders who profit from other people's misery and should not be used for any quick cash fix."⁵

- 6.4 There are two options for how we could make funds available for loans:
 - 1. Commission a Credit Union to administer the loan
 - 2. Set ourselves up as a lending service, with the administration and recovery costs also met from the available fund
- 6.5 Either of these two options would recycle the available funds, potentially making further loans possible to more residents in Brent depending on the attrition rate of the loan.
- 6.6 The Poverty Commission has opined on these plans (appendix 1), and the feedback has been positive one representative described it as "necessary".
- 6.7 The joint working with a Credit Union is the recommended option as they already have in place a test for the applicant's eligibility and ability to repay, debt advice expertise and necessary recovery mechanisms.
- 6.8 The Credit Union will be FCA certified, meaning that loans can be awarded with longer repayment periods. Without FCA approval, the loan repayment period is restricted to a maximum of 12 months and 12 repayments. Using a Credit Union

⁵ https://www.local.gov.uk/lga-avoid-loan-sharks-exploiting-covid-19-crisis-average-benefit-claims-1000-cent?utm_source=LinkedIn&utm_medium=social&utm_campaign=SocialSignIn

- to broker the loan would ease the pressure on individuals to make loan repayments in a short period whilst maintaining other ongoing expenses, for example monthly rental payments.
- 6.9 Additionally, the Credit Union will report to the credit agency. As residents start making repayments, this will be reported to the credit agency and will improve their credit rating and overall ability to access mainstream funding in the future.
- 6.10 If the Council were to operate this lending programme internally, officers would need to ensure the programme is up and running within a short period of time. The Council considers it essential for the programme to commence immediately to ensure that the necessary support reaches people as soon as possible.
- 6.11 It is therefore proposed that the Council uses surplus money from the Hardship Fund to cover the funding for the loan facility and to cover the costs to a Credit Union for the administration of each loan.
- 6.12 It is anticipated that the Council will pay a fee to the Credit Union for each loan administered. The exact cost of the scheme will be dependent on a number of factors including the term and amount of the loan. Market testing has indicated that the contract will be 'low value' under the Council's constitution and as such, officers will seek to obtain at least three quotes from Credit Unions which operate in the Brent to ensure value for money.
- 6.13 Appendix 2 outlines the proposed draft eligibility criteria required to access an interest free loan. The loan will be targeted towards residents who have been financially impacted by COVID-19 as per the obligations of the MHCLG fund, have multiple debts, and are unable to access mainstream financial support. An interest-free loan will be provided to residents to clear outstanding debts in order to maintain their housing tenure, whilst helping them build a credit profile.
- 6.14 Residents who meet the initial eligibility criteria will be referred to the Credit Union to undertake an independent financial assessment; the financial assessment will determine the resident's eligibility for a loan and identify their debtors.
- 6.15 If the assessment deems them as eligible, residents will be required to sign a loan agreement with the Credit Union. The Credit Union will then make payments directly to the resident's identified debtors. The duration of the loan and frequency of loan repayments will be determined during the financial assessment.
- 6.16 For those residents whose financial assessment deems them as not eligible for a loan, referral routes into a Brent-based money advice agency will be established to provide advice on accessing grant funding and additional support on money management.
- 6.17 As a guide, officers anticipate that loans of up to £15K will be available to residents who are homeowners and £7.5K to those who are tenants⁶. The exact loan amount will be determined on an individual basis and will be dependent on the outcome of the financial assessment.

⁶ Figure based upon benchmarking exercise undertaken with a Credit Union

- 6.18 Action taken against those who default on loan repayments will be determined in conjunction with the Credit Union. A soft approach will be taken with referral routes into a Brent-based money advice agency for additional support and will not include the use of bailiffs. Once the agreed enforcement action has been exhausted, the Credit Union will be required to seek approval from the Council to write-off defaulted loans.
- 6.19 Monthly reports will be provided to the Council on the number of loans administered and the repayment rate. The lending criteria of the loan will be reviewed as required based upon the rate of monthly repayments. For example, if it is apparent that there is a large number defaults in the first month, then the lending criteria will be reviewed to reduce the risk to the Council.
- 6.20 Work is ongoing to determine the best way of providing the funding for the Credit Union to bolster its lending capacity. This could be with a corporate guarantee. An effective system of feeding through the money as the pot diminishes will need to be established.
- 6.21 We will be ring fencing a sum of money for this initiative, and from this paying the interest that would otherwise have been due as a 'fee' for the credit union. So, if they paid a loan of £1000 for example, and would usually charge 1% interest the Credit Union would take the interest from the 'pot' rather than the debtor and as such over time the available pot of money would reduce to nil through this and defaulted, and not recovered loan amounts.

7.0 Financial Implications

- 7.1 The Hardship grant awarded to the Council is £3.9m and modelling undertaken to date suggests £1.3m will be spent on reducing the bills of working age claimants of CTS by up to £150, leaving £2.6m to fund the activities proposed in this report.
- 7.2 There is a risk that the cost of providing further CTS to working age claimants increases beyond the £1.3m spend currently forecast as more residents become eligible for CTS. If this transpires, the activities proposed in this report will need to be scaled back accordingly. Therefore, strong financial controls will need to be implemented from the outset to ensure total expenditure does not exceed the £3.9m grant amount.
- 7.3 As the Council will be underwriting these loans, any defaults will become the liability of the Council to fund, which will reduce the amount of grant available for further loans and direct grants.

8.0 Legal Implications

8.1 The money that is paid out under the Council Tax COVID-19 hardship fund 2020-21 by MHCLG to Brent Council as a billing authority is made through a grant under section 31 of the Local Government Act 2003.

- 8.2 Paragraph 13 of the Council Tax COVID-19 hardship fund 2020-21 Local Authority Guidance ("the Guidance") states the Government's strong expectation is that billing authorities will provide all recipients of working age local council tax support ('LCTS') during the financial year 2020-21 with a further reduction in their annual council tax bill of £150, using their discretionary powers to reduce the liability of council tax payers outside of their formal LCTS scheme design. On 26 May 2020, the Chief Executive used her emergency powers to approve the reduction in council tax liability of up to £150 for the period of 2020/21 for those council tax payers living in Brent who are of working age and in receipt of LCTS.
- 8.3 The Council Tax COVID-19 hardship fund 2020-21 Local Authority Guidance ("the Guidance") sets out the grant provisions for those working age Local Council Tax Support recipients. The said Guidance also states that having allocated grant monies to reduce the council tax bill of working age Local Council Tax Support recipients by a further £150, billing authorities should establish their own local approach to using any remaining grant monies to assist those in need. This point is expanded in paragraph 19 of the Guidance which is quoted above in paragraph 3.6 of this report.
- 8.4 The Council is also proposing to use grant monies under the Council Tax COVID-19 hardship fund 2020-21 to fund discretionary reductions in council tax liability pursuant to its proposed policy under section 13A(1)(c) of the Local Government Finance Act 1992 and that policy will be submitted to the Cabinet for approval on 20 July 2020.
- 8.5 The Council has powers to administer and distribute grant funding and implement the proposals set out in sections 5 and 6 of this report pursuant to the general power of competence as set out in section 1 of the Localism Act 2011. Any distribution of grant funding will need to be in accordance with delegated powers in Part 3 of the Council's Constitution. There will need to be an agreement between the Council and the recipient to govern the terms and conditions of the grant.
- 8.6 With regard to the recommendation to make interest free loans, the selection of a Credit Union for processing loans would be classed as a procurement. Based on the estimated value referred to in paragraph 6.12 above for the delivery of the service, the value of the contract for the purposes of the Council's Constitution will be classified as a "Low Value Contract". Contracts valued between £25,000 and £189,330 are classed as "Low Value Contracts" under the Council's constitution. Pursuant to Contract Standing Order 86 (c) of Part 2 of the Council's Constitution no formal tendering procedures apply to Low Value Contracts, except that at least three (3) written quotes must be sought and the quotes sought and/or obtained shall be recorded or alternatively the contract is procured through the Online Market Place. Where quotes are sought, advice must be sought from the Council's procurement officers about how to select the three organisations to be invited to quote and how to structure the quotation process. Unless the Council's procurement officers advise that it is not necessary or appropriate, all guotes shall be sought using the Electronic Tender Facility and at least one of the quotes shall be sought from a Local Brent provider.
- 8.7 Consideration will also need to be given to ensuring that such arrangements for capital funding are state aid compliant. Given the purpose of the funding, it is

- likely to satisfy the requirements of the Services of General Economic Interest Block Exemption.
- 8.8 There will need to be an agreement between the Council and Credit Union to govern the contractual relationship between the parties and to ensure that any monies invested are ring-fenced for the categories of borrowers identified. The Council will also need to approve any loan template between the Credit Union and the individual borrowers.

9.0 Equality Implications

- 9.1 The public sector equality duty, as set out in section 149 of the Equality Act 2010, requires the Council, when exercising its functions, to have "due regard" to the need to eliminate discrimination, harassment and victimisation and other conduct prohibited under the Act, to advance equality of opportunity and foster good relations between those who have a "protected characteristic" and those who do not share that protected characteristic. The protected characteristics are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.
- 9.2 Having due regard involves the need to enquire into whether and how a proposed decision disproportionately affects people with a protected characteristic and the need to consider taking steps to meet the needs of persons who share a protected characteristic that are different from the needs of persons who do not share it. This includes removing or minimising disadvantages suffered by persons who share a protected characteristic that are connected to that characteristic.
- 9.3 There is no prescribed manner in which the council must exercise its public sector equality duty but having an adequate evidence base for its decision is necessary.
- 9.4 An Equalities Impact Assessment has not to date been carried out. However, this scheme will benefit all residents in Brent affected by the virus-outbreak and will be available to all eligible residents, including those in one of the 9 protected groups.
- 9.5 We will be advertising this scheme through our partners in the charity sector and would expect them to help us reach their clients and patrons to make sure they are applying for this additional support.
- 9.6 No resident will be worse off because of these proposals.

10.0 Consultation with Ward Members and Stakeholders

10.1 Because of the urgency of the current pandemic situation, the need for payments in loans and grants to be made as soon as possible to support local residents in financial difficulty arising from the pandemic situation and as this funding from the Government must be spent by March 2021, no formal consultation process has been carried in relation

Report sign off:

Peter Gadsdon
Strategic Director Customer and
Digital Services

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to the proposals in this report.

<u>Appendix 1 - Poverty Commission Feedback on the Interest Free Loan</u> Proposal

- 1.1 A draft loans proposal was submitted to members of the Brent Poverty Commission in May 2020 for consideration.
- 1.2 Below is a summary of the key themes of feedback received from representatives. The feedback received was considered when developing the proposal further.
 - An interest free loan scheme in Brent is welcomed
 - There is a clear demand for this type of support in Brent
 - This would be a particularly beneficial form of support for those residents who
 have been furloughed and are fortunate enough to have jobs to return to and
 may have built up debts during the pandemic
 - A loan period of longer than 12 months would be beneficial for those residents who have larger debts and would otherwise struggle to pay of loan whilst managing their other monthly payments (such as rent and utility bills)
 - The offer of money management advice is an integral part of the proposal and will be beneficial in helping residents determine the most suitable routes for financial support and ensuring that they can access the full range of support available to them
 - A financial assessment is crucial in determining that residents don't borrow more than they need and they are able to make loan repayments
 - The Council should carefully consider the steps it would take to recover money owed if a resident failed to make a loan repayment



<u>Appendix 2 - COVID–19 Interest Free Loans Eligibility Criteria</u>

- 1.1 The below should be used as a guide to determine resident's initial eligibility for a loan.
- 1.2 All applications which meet the below will be subject to an independent financial assessment to ascertain their financial eligibility and ability to make repayments.
- 1.3 To receive a loan, residents must be able to evidence that:
 - 1. Their household has been impacted by COVID-19. Suggested criteria includes:
 - In receipt of Coronavirus Job Retention Scheme
 - o In receipt of the Self-Employed Income Support Scheme
 - o In receipt of Small Business Bounce Back Loan
 - o On the NHS COVID-19 Shielding List
 - A reduction in household income in the period since 1 March 2020
 - Being made redundant in the period since 1 March 2020
 - o A new application for Universal Credit in the period since 1 March 2020
 - Previously tested positive for COVID-19 and/or had to self-isolated for a period of time due to COVID-19 symptoms in the household
 - 2. The above has resulted in an impact on the household finances, evidenced by one or more of the following:
 - Rental arrears
 - Mortgage payment default
 - Default on Utility Bill payment (Energy, Water, Broadband)
 - Default on Council Tax Payment
 - o Default on Housing Benefit Overpayment
 - Default on Credit Card payment, where it is evidenced that the money has been used to pay for food/household essentials in the period since 1 March 2020
 - 3. They haven't already received a loan in the last 12 months
 - 4. They have a source of income, from either employment or receipt of benefits





Cabinet

20 July 2020

Report from the Strategic Director, Customer and Digital Services

Council Tax: Discretionary Reduction Policy – Section 13A(1)(c) Local Government Finance Act 1992

Wards Affected:	All	
Key or Non-Key Decision:	Key	
Open or Part/Fully Exempt:	Open	
No. of Appendices:	One: Appendix A: Council Tax: Discretionary Reduction Policy – Section 13A(1)(c) Local Government Finance Act 1992	
Background Papers:	None	
Contact Officer(s):	Peter Cosgrove, Head of Revenue and Debt, Tel 0280 937 2307 Email: peter.cosgrove@brent.gov.uk	

1.0 Purpose of the Report

- 1.1 On 26 May 2020, the Chief Executive used her emergency powers to approve payment of hardship payments to Council Tax payers of working age in receipt of local council tax support (LCTS). This was grant funded by central government with a requirement to pay each up to £150.
- 1.2 The mechanism used to make these payments was section 13A(1)(c) of the Local Government Finance Act 1992 ("1992 Act"). A recommendation of the report was that there would be a further report to Cabinet to expand on the use of section 13A(1)(c) of the 1992 Act and other mechanisms to provide financial relief using the government funding provided to residents affected by the Covid-19 pandemic during 2020/21 from any surplus funds from the grant. This report's focus is on the section 13A Council Tax element of this requirement. This report is required as, at present, the Council has no formal policy relating to the Council's exercise of its discretion and use of section 13A.

1.3 This report sets out to:

Provide background information vis-à-vis the Council's policy regarding the use of and exercise of its discretion under section 13A(1)(c) under the 1992 Act.

ii. Provides details of a new discretionary relief policy under section 13A(1)(c) of the 1992 Act.

2.0 Recommendation(s)

- 2.1 That Cabinet approves the proposed discretionary reduction Policy pursuant to section 13A(1)(c) of the Local Government Act 1992 as set out in appendix A.
- 2.2 That Cabinet notes that the proposed Policy pursuant to section 13A(1)(c) of the Local Government Act 1992 links to council support for vulnerable residents alongside other support mechanisms such as Discretionary Housing Payments (DHP) and Local Welfare Assistance (LWA).
- 2.3 That Cabinet delegates authority to the Strategic Director, Customer and Digital Services in consultation with the Director of Finance in respect of decisions on individual applications for reducing Council Tax payable pursuant to the proposed policy under section 13A(1)(c) of the Local Government Finance Act 1992 as set out in Appendix A.

3.0 Detail

- 3.1 At the Council budget meeting of 25 February 2013 and the previous Executive meeting of 11 February 2013, decisions on reductions in council tax under section 13A(1)(c) of the 1992 Act were delegated to the then Director of Finance and Corporate Resources. This delegation was restricted to individual cases only and not classes of case.
- 3.2 The urgent decision of the Chief Executive of 26 May 2020 provided for the class of taxpayer who are of working age and in receipt of Council Tax Support to be provided with a further reduction of up to £150. This was implemented on 31 May 2020. Further reductions will be made during the year as new claims are processed.
- 3.3 The proposed policy sets the way in which the Council's discretion to make council tax reductions under section 13A(1)(c) of the 1992 Act will be utilised in 2020/21 and in subsequent years. The policy:
 - i. properly makes the distinction between debt write-off of an uncollectable debt due to deceased, bankrupt, vacation of a property where there is typically no ongoing liability and a section 13A(1)(c) council tax reduction where the taxpayer has a continuing liability for the property.
 - ii. sets out how individual cases are dealt with on their merits and provides criteria to consider as:
 - a) Fire and flood
 - b) Domestic violence
 - c) Losses due to theft
 - d) Safeguarding
 - e) The above list is not exhaustive and officers will use their discretion in reviewing applications
 - iii. The policy sets out two classes of taxpayer as eligible:

- a) Those of working age in receipt of Council Tax Support as per the council decision of 26 May 2020 in accordance with government guidance;
- b) In accordance with the "Local Offer" for Care Leavers Brent care leavers aged between 18 and 24 years old who are liable for council tax in the borough, have their liability reduced to zero. Brent care leavers outside the borough are supported through a separate mechanism.
- 3.4 It is expected that in 2020/21 reductions under this policy will benefit around 2,000 households.

4.0 Financial Implications

- 4.1 The cost of the hardship scheme is fully funded by the central government grant of £3,948,577. The estimated cost of this scheme during 2020/21 is £1.3m, however this is expected to rise during the year as more residents become eligible for council tax support.
- 4.2 The cost of supporting care leavers in 2020/21 is estimated at £65,000.
- 4.3 Ad hoc 13A awards are expected to increase in demand during 2020/21. It is estimated that total awards will not exceed £150,000.
- 4.4 The total expected cost is £1.515m and will be funded in 2020/21 from the government grant.

5.0 Legal Implications

- 5.1 The Council Tax Covid-19 hardship fund 2020-2021 Local Authority Guidance ("the Guidance") sets out the grant provisions for those working age Local Council Tax Support recipients.
- 5.2 The Guidance stipulates the need to expedite the provision of support to individuals and "where council clearance processes are considered necessary to avoid delays, they should be kept as light touch as possible within the governance arrangements of each authority" (cf. paragraph 8 of the Guidance).
- 5.3 The underpinning principles in the Guidance is to put in place with expediency the necessary financial support to those people who are struggling to meet their Council Tax payments, especially during the current pandemic period.
- This proposed policy regarding discretionary relief in respect of council tax liability under section 13A(1)(c) of the 1992 Act is separate from the Council's powers to reduce council tax liability under the Council's Council Tax Support scheme under section 13A(1)(a) and 13A(2) of the 1992 Act.
- 5.5 The Council's power and discretion to make reductions in council tax liability under section 13A(1)(c) of the 1992 Act (i) includes the power to reduce the council tax liability to nil (cf. section 13A(1)(6) of the 1992 Act); and (ii) may be exercised in relation to particular cases or by determining a class of case in

which liability is to be reduced to an extent provided by the determination (section 13A(1)(7) of the 1992 Act).

6.0 Equality Implications

- 6.1 The public sector equality duty requires public bodies to pay due regard to the need to:-
 - eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010;
 - 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
- 6.2 The Equality Act 2010 and the Public Sector Equality Duty (outlined above) cover the following nine protected characteristics: age, disability, marriage and civil partnership, gender reassignment, pregnancy and maternity, race, religion or belief, gender and sexual orientation.
- A new and revised LCTS scheme went live for those of working age on 1 April 2020. The scheme provides financial assistance for Council Tax payers who are financially vulnerable and require assistance to meet their Council Tax liability. LCTS for those of working age is calculated on the claimant's net CTAX liability after the granting of any other Council Tax discounts (e.g. Single Person Discount). The policy here provides an extra safety net as allowed by the legislation. It is expected to benefit around two thousand households in 2020/21.

7.0 Consultation with Ward Members and Stakeholders

7.1 Citizens Advice Brent have welcomed the introduction of a formal and more detailed policy for the Council to exercise its discretion in making reductions to council tax liability under section 13A(1)(c) of the 1992 Act. Citizens Advice Brent commented on the policy and are happy with the sentiment. There has been no consultation with ward members as the policy follows on from the existing delegation and ensures that the Council has a policy in place to properly deal with those faced with extreme difficulty in paying their Council Tax, especially during the period of this pandemic.

8.0 Human Resources/Property Implications (if appropriate)

8.1 None

Related documents: Urgent Decision of the Chief Executive of 26 May 2020

Report sign off:

STRATEGIC DIRECTOR

Peter Gadsdon

Council Tax: Discretionary Reduction Policy – Section 13A(1)(c) Local Government Finance Act 1992

1. Background

Section 13A)(1)(c) of the Local Government Finance Act 1992¹ (13A)(1)(c) as amended provides powers to the Council to reduce the amount of council tax payable for an individual or class of persons.

The authority to make these awards is delegated to the Strategic Director of Customer and Digital Services in consultation with the Director of Finance.

This policy notes there is a difference between writing off an uncollectable debt and reducing the amount payable under this provision. A write-off may be processed where a Council Tax amount is uncollectable, e.g. deceased, bankrupt, vacated and forwarding address unknown, etc. However, a reduction under section 13A(1)(c) will normally be applicable where the taxpayer has a continuing liability for the property.

Unless other non-council funding available, the cost of awards under this policy is borne in its entirety by the Council and therefore its council taxpayers. The granting of 13A)(1)(c) reductions must be balanced against their financial impact on residents and will therefore only be granted in the circumstances described in this policy.

The Council makes a sum of money available each year for the provision of 13A)(1)(c) reductions.

2. How to claim a discretionary reduction

The application should usually relate to the current council tax year.

It must be made in writing by the taxpayer or by someone authorised to act on their behalf to the principal council tax office and titled "Section 13A Application". Information is provided on the Council's website for this purpose: https://www.brent.gov.uk/services-for-residents/council-tax/having-difficulty-in-paying/

The Council may request any reasonable evidence in support of an application. Separate claims must be made in respect of different dwellings and/or council tax accounts.

¹ 13A Billing authority's power to reduce amount of tax payable

⁽¹⁾Where a person is liable to pay council tax in respect of any chargeable dwelling and any day, the billing authority for the area in which the dwelling is situated may reduce the amount which he is liable to pay as respects the dwelling and the day to such extent as it thinks fit.

⁽²⁾The power under subsection (1) above includes power to reduce an amount to nil.

⁽³⁾The power under subsection (1) may be exercised in relation to particular cases or by determining a class of case in which liability is to be reduced to an extent provided by the determination]

3. Discretionary Relief Policy

3.1. Individual cases

The Council considers all claims for relief and considers them on the particular circumstances of the council taxpayer. Any relief to be awarded is entirely at the Council's discretion, up to and including reducing liability to nil, with a requirement for some or all of the following criteria to be met for each case:

- i. There must be evidence of financial hardship or personal circumstances that justifies a reduction in council tax liability. Where an application is made in respect of financial hardship, evidence of all income and expenditure will be required to enable a full assessment to be undertaken, examples would include:
 - a. Fire and flood
 - b. Domestic violence
 - c. Losses due to theft
 - d. Safeguarding
 - e. The above list is not exhaustive and officers will use their discretion in reviewing applications
- ii. The taxpayer must satisfy the Council that all reasonable steps have been taken to resolve their situation prior to application
- iii. All other eligible discounts/reliefs/benefits have been awarded including CTS
- iv. The taxpayer does not have access to other assets that could be used to pay council tax
- v. Can the situation be resolved by some other legitimate means, such as the complaints procedure, if it can it is unlikely that an award will be made
- vi. The situation and reason for the application must be outside of the taxpayer's control
- vii. The amount outstanding must not be the result of wilful refusal to pay or culpable neglect
- viii. The power to reduce under this section will be considered taking account of all circumstances and any reduction will take into consideration the borough's council tax payers
- ix. Relief will only be applicable to the council tax payer's primary home

3.2. Classes of reduction

3.2.1. Covid-19 Pandemic

This section (3.2.1) applies only to the financial year 2020/21 and payments made in that year. No application is required. Hardship payments are made as a reduction to council tax liability in accordance with government guidance. In summary, Council Taxpayers of working age in receipt of Council Tax Support during the 2020/21 financial year will receive up to £150 as a hardship payment. Where the remaining liability is £150 or less only the remaining liability is paid. During 2020/21 further discounts of up to £150 will be paid as they become eligible to CTS and of working age during 2020/21 financial year. Where liability is less than £150, the support is limited to the level of liability.

3.2.2. Care Leavers

A discretionary relief is awarded to Brent care leavers aged between 18 and 24 years old who are liable for council tax in the borough as part of "Local Offer" for Care Leavers. To be

eligible the care leaver must be liable for council tax and have previously been in the care of Brent Council. Brent care leavers resident outside the borough are supported using a different mechanism². The relief is applied after all other discounts have been awarded and there remains an amount to pay. If a care leaver is already in receipt of an exemption no relief is awarded. Should that exemption end the care leaver would then be entitled to care leaver relief if they remain liable for council tax. The relief is awarded up until the end of the current financial year or on the care leaver's 25th birthday, whichever is earliest. Eligible care leavers are identified by the Council and relief is awarded automatically with no application needed. Any care leaver who believes they qualify but have not received any relief should contact the council tax team. Section 13A(1)(c) of the Local Government Finance Act 1992 allows the Council to reduce the amount payable, but not to amend who is named on the bill. The relief is applied to the council tax account and as a result, relief would still be applied where a care leaver and a non-care leaver are jointly liable for the council tax bill.

4. Amount of relief

The eligibility criteria is set out in paragraph 3. Any relief to be awarded is entirely at the Council's discretion, up to and including reducing liability to nil. The decision will be made, wherever possible, by front line staff dealing directly with taxpayers. Taxpayers will also be considered for a Discretionary Housing Payment and Local Welfare Assistance where available and appropriate.

All taxpayers are entitled to make an application for a discretionary Council Tax relief reduction. Although the discretionary reduction will only be granted to taxpayers in exceptional circumstances and will only normally be for a short period.

5. Decision

The local authority must notify its decision to the applicant in writing within 14 days or as soon as it is reasonably practicable to do so. The letter must make it clear to the applicant, that there is a requirement to report any relevant changes in circumstances, and the implications if s/he does not do so, and how an appeal against the decision may be made.

6. Appeal

Under Section 16 of the Local Government Finance Act 1992, there is a right of appeal if a customer applying for a discretionary reduction under Section 13A)(1)(c) is aggrieved by the Council's decision. The appeal must be in writing to the council. The Council will then consider this appeal and whether the customer has provided any additional information against the required criteria that may justify a change to its decision. If the original decision is upheld and the customer remains aggrieved, there is a further right of appeal to a valuation tribunal. This includes a decision on the exercise of an authority's discretion, that there is a liability for council tax, or the amount of council tax payable, as long as:

- i. The Council has disallowed the original appeal
- ii. The applicant is not satisfied with the steps your local authority is taking to resolve your grievance

² Brent Care Leavers outside the borough are supported through the Council "Local Offer" for Care Leavers, Cabinet decision 12 February 2018, agenda item 14, a different payment mechanism is used that is outside this policy.

iii. No decision to the appeal has been given and it has been more than two months

All appeals to the Valuation Tribunal are required to be in writing. Time limits to appeal to the valuation tribunal will vary depending on the reason given for making the appeal and the response of the Council.

An appeal against the decision of the Valuation Tribunal can be made to the Upper Tribunal and to the High Court if the appeal is in respect of a point of law only.

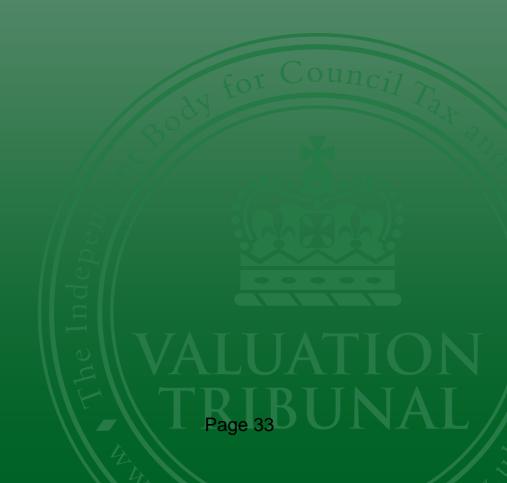
The Valuation Tribunal Service has published a booklet (see appendix 1) on preparing for an appeal against a council tax reduction scheme decision, this includes appeals against decisions relating to the Council's policy relating to 13A)(1)(c) and its local council tax support scheme.

Appendix 1



CTR-Appeal-Hearin g.pdf

Your appeal and preparing for your Valuation Tribunal hearing



We can produce this booklet in large print and in Braille. An audio version is available on our website: www.valuationtribunal.gov.uk.

We can translate this booklet into Arabic, Bengali, Chinese, Gujarati, Polish, Punjabi, Urdu and Vietnamese.

If you would like a copy of this booklet in another format or language, please let us know.

We aim to treat everyone fairly. We will not treat anyone making an appeal less favourably for any reason.

This guide does not cover every point about the Valuation Tribunal. Our staff will reply to any reasonable request you have for advice on our procedures but we cannot offer detailed advice on your appeal.

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Valuation Tribunal Council Tax Reduction **Appeal Process**

We have registered your appeal.

Please read our guidance booklet.

Next we list your appeal for a hearing.



You prepare your case

The checklist on the back of the booklet may help you. You can contact us at any time before the hearing to ask for general, independent advice.

You may also continue to talk to the council.

You may want to refer to your council's scheme for council tax reduction

THE HEARING



You may be told the Tribunal's decision at the hearing. Or we will aim to send you the Tribunal's decision in writing within a month of the hearing.



You may not agree with the decision

The booklet we send with the decision will explain what you Page 35 can do.



The council will send you and us a copy of the evidence they will be asking the Tribunal to hear about your case.



Please contact us if you

- don't understand something about the process;
- want to tell us something about what the council has sent you;
- need a postponement;
- want to have your case heard without your being there (you must tell us at least two weeks before the hearing);
- have asked someone else to speak for you at the hearing;
- want to stop (withdraw) your appeal (or you can complete a form on our website).

Nearer the hearing date, we contact you to see if you are coming to the hearing. We may then also be able to give you an idea what time your appeal will be heard.





If your appeal is successful, we tell the council to make any change the Tribunal has ordered.



The council makes the change, looks again at your bill and tells you about any changes it makes.

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Your appeal and preparing for your Valuation Tribunal hearing

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Your appeal and preparing for your Valuation Tribunal hearing

About this booklet

- 1. This booklet deals with appeals against decisions of the council about council tax reduction.
- 2. The booklet gives you information about the *Valuation Tribunal*, the notices you receive from us, the service we provide and what happens next. The information will be useful to you throughout the whole appeals process, so please keep it for reference.
- 3. Words or phrases in *italics* in this booklet are explained under the heading 'Technical terms' on page 18.
- 4. It is one in a series giving guidance about appealing to the Valuation Tribunal. Others, listed on page 20, may be downloaded from our website: www.valuationtribunal.gov.uk or requested at any time.

What is the Valuation Tribunal?

- 5. The Valuation Tribunal for England (VTE) has been established by Act of Parliament to decide disputes in respect of council tax and non-domestic rates
- 6. The *Valuation Tribunal* is an independent judicial body (like a court) and has no connection with the *council* (that sends out council tax and rates bills) or with the Valuation Office Agency (that sets council tax bands and rateable values on properties).
- 7. The Tribunal is made up of a President, Vice-Presidents and a panel of chairmen (who together are known as 'senior members') and ordinary members. The lay volunteer members are local people who receive

Your appeal and preparing for your Valuation Tribunal hearing

training to perform this role. They are assisted by a clerk or tribunal officer who offers advice on the relevant law, practice and procedure and usually drafts the panel's decision into written form.

- 8. The President can set up panels to hear appeals with up to three members, depending on the issues involved. The panel can be chosen from the lay members of the Tribunal or, in more complex council tax reduction appeals, a member from the *First-tier Tribunal* with experience in such matters may sit with a senior member of the Valuation Tribunal.
- 9. The Tribunal is administered by the Valuation Tribunal Service, a body also established by Act of Parliament, which provides the necessary resources, staff, buildings and so on.

How does the Tribunal function?

- 10. The Tribunal is governed by law. The law and procedure relevant to an appeal are to be found in statutory regulations (see page 15), which are supplemented by Practice Statements made by the President. These are listed at the end of this booklet and can be found on the website: www.valuationtribunal.gov.uk. The Tribunal must also adhere to other legal requirements, including the relevant decisions of higher courts.
- 11. The Tribunal aims to be as informal as possible, but as a judicial body its hearings are in public and structured and there is therefore some formality in the proceedings.
- 12. There are no fees to be paid and the service is entirely free. The Tribunal cannot pay anyone's expenses or order anyone to pay the costs or expenses of the other side, whatever the outcome of the appeal.

Your appeal and preparing for your Valuation Tribunal hearing

- 13. You may present your own case or be represented or assisted by someone else.
- 14. Hearings before the Tribunal are in public, unless there are exceptional grounds for the hearing to be in private. These grounds are set out in a Practice Statement (B4: *Hearings in private and extraordinary venues*). You may download this from our website: www.valuationtribunal.gov.uk or request a copy from our office.

Information about appeals

- **15**. The Tribunal hears appeals against *council* decisions on the following:
 - You think that your council tax bill is wrong.
 - You think that the council should give you a reduction on the council tax you pay in accordance with the council's scheme.
 - The council has issued you with a penalty notice for not sending them some information
- 16. However, the Tribunal cannot hear appeals about the contents of the council's scheme, but only about the way it has been applied to your individual case. If you feel the scheme itself is unlawful then the remedy is to apply for judicial review in the High Court.
- 17. The Tribunal does not hear appeals about housing benefit or why you have not paid your council tax bill. The council will let you know the correct procedure you need to follow and how to deal with these matters.
- 18. If you are also appealing to the *First-tier Tribunal* about your housing benefit, please let us know as this will help us manage your appeal.

Your appeal and preparing for your Valuation Tribunal hearing

Before the hearing

You may wish to:

- 19. Contact the council to try to settle your appeal with them. You can do this right up until the date of the hearing, but the earlier you talk to them the better. If your appeal cannot be settled, it is helpful to the panel and to you if you and the council have agreed facts and discussed any evidence that each of you will present at the hearing to avoid your case having to be *adjourned*. If you reach a settlement before the hearing date, please let us know.
- **20.** Seek advice. You can get advice from Citizens Advice: www.citizensadvice.org.uk.

You may get advice from a legal adviser; this may be under the civil legal aid scheme, which changed from 1 April 2013. To find out what help might be available, contact Civil Legal Advice; the phone number for this is 0845 345 4345 and their email address is emailhelp@civillegaladvice.org.uk. More information about the scheme can be found on:

www.gov.uk/legal-aid www.adviceguide.org.uk/england.

You have received a notice of acknowledgement

21. This tells you that we have received your appeal and gives our contact details. It shows the information we have about your appeal including the appeal number, which you should quote if you contact us about your appeal. If any of the information in the notice is wrong, please let us know.

Your appeal and preparing for your Valuation Tribunal hearing

22. The notice also includes a two-page enquiry form, which we need you to fill in and return to us within two weeks of receiving it. This will advise us whether you wish to continue with your appeal and help us to make arrangements for your appeal. Where the council has sent you a decision notice, it would be helpful if you could send us a copy of it.

You will receive a notice of hearing

- 23. This will tell you when and where the Valuation Tribunal will hear your appeal. The Tribunal aims to hear your appeal as soon as possible after receiving it and to give you at least six weeks' notice of the hearing.
- 24. If you cannot come to the Tribunal hearing, you can:
 - send a representative, but we must have a letter before or at the hearing (if you are not also intending to be present) confirming that that person may represent you;
 - ask the *panel* to hear the case without your being there (see paragraph 33); or
 - contact us to ask for another hearing date. However, we will give you a new hearing date only if you have a good reason for not being able to attend on the original date. It may be some time before we can give you a new date.

Please contact us if you would like a copy of the Practice Statement on *Postponements and Adjournments* or you can download a copy from our website: www.valuationtribunal.gov.uk

25. If you do not come to a hearing and do not contact us, your appeal will be *struck out*.

Your appeal and preparing for your Valuation Tribunal hearing

Do I still need to pay my council tax?

26. Even though you have appealed, you must still make the payments shown on your council tax bill.

How do I prepare my case before the hearing?

- 27. At least two weeks before the hearing, the *council* should tell you about any evidence they will use at the hearing.
- 28. Please try to provide as much evidence as possible to support your case. You will be allowed to:
 - give oral and written evidence;
 - present anything that you believe will help your case; and
 - call witnesses.
- 29. The council's evidence can appear fairly formal but we do not expect you to present your evidence in the same way as the council.
- **30.** You may find useful information on your council website and on www.gov.uk.
- 31. The main legislation that applies to these appeals is shown on page 15.
- **32.** A checklist of things you should do to prepare for your hearing is included on the inside back page of this booklet.

Your appeal and preparing for your Valuation Tribunal hearing

Do I need to come to the hearing?

33. It is very helpful if you come to the hearing so that you can put your case, answer any questions the panel has and ask questions of the council. Our statistics show that a higher percentage of appellants succeed in their appeal if they do attend or are represented. However, there are arrangements in place for appeals to be dealt with in your absence:

A hearing in your absence

34. If you want the panel to hear the case without you, you must write to us and the council at least 14 days before the hearing and give details of any points that you want the panel to consider (your 'written submission'). If you do not do so your appeal is likely to be struck out. The council will still come to the hearing. If the panel considers that it is not able to deal properly with your appeal in this way, it may adjourn to another date for you to attend. Further details are in a Practice Statement (B3: Appellant's non-attendance) and the list of matters to include in a written submission is shown on page 19.

A decision without a hearing

35. If an appeal is decided on written statements only, this is known as a decision without a hearing and neither you nor the council will be there. If you ask us to deal with an appeal in this way and the council objects to this we will let you know, as both sides have to agree to this procedure being used.

You can find more details in a Practice Statement (A6: *Decision without a hearing*).

You can ask for a copy of a Practice Statement at any time or download it from our website: www.valuationtribunal.gov.uk.

Your appeal and preparing for your Valuation Tribunal hearing

- 36. The panel will *strike out* your appeal if:
 - you do not come to the hearing or send anyone to represent you; and
 - you have not asked the panel to hear the case without you there; and
 - the Tribunal is satisfied that the notice of hearing was sent to you.

Am I likely to win my appeal?

- 37. We are independent and have to be impartial so, although we can advise you about general procedure, we cannot advise you about whether you have a good case for making an appeal or whether or not your appeal would be successful. Each case is considered on its merits.
 - The 'success rate' for appeals heard by a panel varies, but for all appeal types, when the appellant attends or is represented, about one in three or four appeals is allowed or part allowed.
- 38. We shall contact you before the hearing, unless we know that your appeal has been settled. We shall phone you to find out whether you will be coming to the hearing and may be able to offer individual appointment times to those whose cases are being heard that day.

Your appeal and preparing for your Valuation Tribunal hearing

Who will be at the hearing? The panel

39. Up to two members will hear your appeal depending on the issues involved. The panel can be chosen from the lay members of the Tribunal or, in more complex appeals, a member from the First-tier Tribunal with experience in such matters may sit with a senior member of the Valuation Tribunal. The members of the panel are independent of the council that sends out the council tax bills.

A representative of the council

40. You may have already been in contact with a member of the council staff during the discussion of your dispute.

The clerk

41. The clerk is a paid employee who acts as an adviser on points of procedure and law. The decision is made only by the members of the panel, but the clerk is responsible for writing up their decision.

You, the appellant

42. You can come to the Tribunal hearing or you can have a representative (for example, a friend or a solicitor) speak for you, whether or not you will be there yourself. However, if you do not intend to be present, we must have a letter from you before or at the hearing confirming that that person may represent you.

Members of the public

43. The hearing is open to members of the public. Typically however, the only other people who come to a hearing are those who are waiting for their cases to be heard.

Your appeal and preparing for your Valuation Tribunal hearing

What happens at a hearing?

- **44.** The hearing is as informal as possible and we will try to put everyone at ease, but these are judicial proceedings and a degree of formality is inevitable.
- 45. The *panel* will normally follow a procedure set out in a Practice Statement B1: *Model Procedure*. You may download this from our website: www.valuationtribunal.gov.uk or request a copy from our office. However, this procedure may be modified if the circumstances justify it.
- **46**. The panel will decide who will put their case first, but if you would prefer to give your case first or second, please let us know.
- **47.** Usually, before the hearing, the panel will have read any documents it has received about the case. If necessary, it will *adjourn* the hearing to allow documents to be read.
- **48.** During the hearing:
 - the panel will ask you and the council to present your cases;
 - you will be able to ask the council questions;
 - the council will be able to ask you questions; and
 - the panel can ask you and the council questions.
- **49.** Before the panel retires to make its decision, it will ask you if you would like to summarise your case (in other words, go over the main points of your case again).
- **50.** The Tribunal's decision may be announced on the day of the hearing but often it will be sent to you in writing.

Your appeal and preparing for your Valuation Tribunal hearing

How long does a hearing last?

51. It is difficult to say how long a hearing lasts as it depends on the complexity of the case and how much evidence each side presents. Hearings typically last around thirty minutes.

What if I have additional needs?

- **52.** Please let us know in good time if you have any extra needs.
- 53. If you have any additional needs related, for example, to your sight, hearing or mobility, please tell us and we will do our best to help. We will meet the cost of providing a suitable place or any equipment that is necessary to hear your appeal. We may also, in very special circumstances, arrange for the hearing to be held in your own home or somewhere that allows you full access. Further details of this can be found in a Practice Statement (B4: Hearings in private and extraordinary venues). You may download this from our website: www.valuationtribunal.gov.uk or request a copy from our office.
- 54. If you have problems understanding English, we can provide an interpreter. Please tell us which language you speak. Please note that the interpreter will not be able to make your case for you, but only to translate what is said. We can also provide someone to help you communicate, for example, a signer. We will pay the costs of providing this help.
- 55. Our website has more guidance, which can be accessed using BrowseAloud, a feature which allows you to have the text read out or to download as an MP3 file, in English or another language.

Your appeal and preparing for your Valuation Tribunal hearing

After the hearing

You will receive a notice of decision

- 56. The notice gives you, and everyone else involved in the appeal, the Tribunal's decision and comes with a brief statement of the reasons for reaching this decision. It also confirms the information that we will keep as a record of your appeal. By law, these records have to be available for the public to see. If any of the facts in this notice is wrong, please let us know so that we can correct it.
- **57.** The notice will be accompanied by an additional document containing further details on what happens next.

Can you award costs?

58. No. There is no power to order one side to reimburse the expenses of the other, whatever the outcome. You have to meet your own expenses (and the expenses of anyone representing you) in preparing your case and coming to the hearing.

Complaints

- 59. You may complain about the way your case has been handled by the staff or your treatment by the staff by writing first to the office about whose administration you are complaining. They will pass any unresolved complaint to the Operations Manager.
 - Please mark your envelope or email 'COMPLAINT'.
- **60.** You can download a copy of our Customer Charter and Complaints Policy from our website or request a copy from the office that sent you the notice.

Your appeal and preparing for your Valuation Tribunal hearing

- 61. You may also complain, to the President of the Tribunal, about the behaviour of a member or members of the panel, but this must relate to such things as inappropriate comments or discourtesy.
- **62.** Objections to a decision must be pursued by way of appeal or review. Further information can be found in our leaflet '*The Valuation Tribunal's decision on your appeal*' which you may download from our website or request a copy from our office.

How to contact the Valuation Tribunal

63. Our office contact details are:

Email: appeals@vts.gsi.gov.uk.

Phone: 0300 123 1033

64. Our website is www.valuationtribunal.gov.uk.

Your appeal and preparing for your Valuation Tribunal hearing

Relevant legislation

These give the general law:

- Local Government Finance Act 2012
- Local Government Act 1992

These statutory instruments set out the rules under which we and the council have to deal with any council tax appeals.

- Council Tax Reduction Schemes (Prescribed Requirements) (England)
 Regulations 2012, Statutory Instrument 2012 No 2885
- Council Tax Reduction Schemes (Default Scheme) (England)
 Regulations 2012, Statutory Instrument 2012 No 2886
- Council Tax Reduction Schemes (Prescribed Requirements and Default Scheme) (England) (Amendment) Regulations 2012, Statutory Instrument 2012 No 3085
- Council Tax Reduction Schemes (Detection of Fraud and Enforcement) (England) Regulations 2013 (SI 2013 No. 501)
- Valuation Tribunal for England (Council Tax and Rating Appeals) (Procedure) (Amendment) Regulations 2013
- Valuation Tribunal for England (Council Tax and Rating Appeals)
 (Procedure) Regulations 2009, Statutory Instrument 2009 No 2269
- Council Tax (Alteration of Lists and Appeals) (England) Regulations 2009, Statutory Instrument 2009 No 2270

Please remember that parts of this legislation may change. You will need to check that the legislation you use is up to date. Larger public and law libraries hold copies of legislation. You can also see legislation on the following website: www.legislation.gov.uk

Your appeal and preparing for your Valuation Tribunal hearing

Practice Statements

You can download these from our website: www.valuationtribunal.gov.uk or request a copy from the office that sent you the notice.

A. Pre-hearing

- 1. Extension of Time Limits for Making Appeals
- 2. Listing of Non-Domestic Rating Appeals
- 3. Complex Cases: Case Management
- 4. Postponements and Adjournments
- 5. Summoning of Witnesses
- 6. Decision without a hearing
- 7.1 Non-Domestic Rates (rating List 2010): Disclosure and Evidence; and President's Explanatory Commentary
- 8. Sending and Delivering Documents
- 9. Initiating a Council Tax Liability Appeal
- 10. Points of Law and Principles of Valuation
- 11. Council Tax Reduction Appeals

B. The hearing

- Model Procedure
- 2. Duties and Responsibilities of the Clerk/Tribunal Officer at the hearing
- 3. Appellant's Non-Attendance
- 4. Hearings in Private and Extraordinary Venue
- 5. Listed appeals where the parties have reached agreement

Your appeal and preparing for your Valuation Tribunal hearing

C. Post-hearing

- 1. Reviewing and Setting Aside Decisions
- 2. Applications for Reinstatement following striking out and withdrawal and lifting of a bar
- 3. Publication of Decisions
- 4. Lead Appeals: Staying of Related Appeals

D. Miscellaneous

- 1. Professional Representatives
- 2. Temporary reduction in rateable values: Consent orders

Your appeal and preparing for your Valuation Tribunal hearing

Technical terms

adjourn

interrupt or suspend the hearing

council

the local authority or billing authority that sends out council tax bills

direction

the Tribunal's written instructions that you and the council must follow

First-tier Tribunal (FTT)

under the Ministry of Justice, made up of judges and members who hear appeals against such matters as housing benefit; the FTT is administered by HM Courts and Tribunal Service

panel

the members of the Valuation Tribunal who will hear your appeal

strike out

the decision made by the panel or chairman to dispose of your appeal and give no further consideration to the case, because you failed to comply with a *direction* or because the case is not within the Tribunal's jurisdiction (powers)

Valuation Tribunal

the name used for both the judicial body that hears appeals against council tax and business rates (the Valuation Tribunal for England) and the administrative Body that supports it (the Valuation Tribunal Service)

written submission

the basic points that need to be made to the Tribunal if you are not attending the hearing; shown opposite

Your appeal and preparing for your Valuation Tribunal hearing

Written submissions must include:

- A statement about the issues, or matters that you and the council disagree about;
- An explanation of the decision you want from the Tribunal;
- Your arguments that support this (including any legislation or case law);
- Evidence that you have to support this;
- Any relevant documents;
- The names of other people you have sent this to (in the council for example) and when you sent it to them;
- Your signature and the date you signed the submission.

Your appeal and preparing for your Valuation Tribunal hearing

Booklets

This guide is one of a series of booklets that give information about our services.

They are available on request and also on our website: www.valuationtribunal.gov.uk.

Your Appeal And Preparing for your Valuation Tribunal Hearing – Council Tax Liability, Completion and Penalty Notices

Your Appeal And Preparing for your Valuation Tribunal Hearing – Council Tax Reduction

Your Appeal And Preparing for your Valuation Tribunal Hearing – Council Tax Valuation

Your Appeal And Preparing for your Valuation Tribunal Hearing – Non-domestic (Business) Rates

The Valuation Tribunal's Decision on your Council Tax Appeal
The Valuation Tribunal's Decision on your Non-domestic (Business)
Rates Appeal

Hearing checklist

This is for your use, to help you prepare for your hearing; you don't need to return it to us.

1.	I have read the booklet, <i>Your Appeal and Preparing for your</i> Valuation Tribunal Hearing	
2.	I have looked at the information that the council has sent me	
3.	I have returned my Pre-Hearing Enquiry Notice to the VTS (This was sent to you with a letter saying that the VTS had received your appeal)	
4.	I have sent a copy of the council's decision notice to the VTS	
5.	I have looked at the council's scheme for council tax reduction (This can be found on your local council's website)	
6.	I know what my options are if I cannot or do not want to attend a hearing (See paragraph 24 of the booklet)	
7.	I have decided that I would like someone to represent me and I have let the VTS know who that person is	
8.	I have spoken to the VTS about my additional needs (See paragraphs 52-55 of the booklet)	
9.	I know what time and where I should attend the hearing	
10.	I have let the VTS know that I (or my representative) will be attending	
11.	I have three copies of any evidence I want to show the panel.	

Please remember that if we do not hear from you and you do not attend the hearing, your appeal may be struck out (that is the Tribunal will not look at it).

If you have any queries about what happens at the hearing, or what you need to do to prepare, and you can't find the answer in the booklet we have sent you, please contact us on 0300 123 1033 or visit our website: www.valuationtribunal.gov.uk.

When you contact us, please tell us your appeal number which can be found on all correspondence we send you.

Valuation Tribunal

Telephone: 0300 123 2035

www.valuationtribunal.gov.uRage 60

Agenda Item 10



Cabinet 20 July 2020

Report from the Strategic Director Regeneration & Environment

PARKING POLICY 2020

Wards Affected:	All	
Key or Non-Key Decision:	Key	
Open or Part/Fully Exempt:	Open	
No. of Appendices:	Appendix 1: Parking Policy 2020	
Background Papers:	None	
Contact Officer(s):	Gavin F Moore. Head of Parking & Lighting; gavin.f.moore@brent.gov.uk; Tel (020) 8937 2979	
	Anthony Vartanian. Policy Manager, Parking & Lighting; anthony.vartanian@brent.gov.uk; Tel (020) 8937 2985	

1.0 Purpose of Report

- 1.1 On 16th November 2015, Cabinet agreed the Council's 2015 Parking Strategy. The document provided a strategic foundation for the Council's parking policies and operational practice. It drew together existing policy in a coherent baseline document, with the aim of establishing a firm foundation for future policy development.
- 1.2 The Parking Policy 2020 draws on the 2015 Parking Strategy foundation and framework to provide an update to the Council's parking policies and operational practices since 2015. This document also reflects the up to date priorities and objectives set out in the Council's Long Term Transport Strategy and the Borough Plan. It has been re-titled as a 'Policy' document to more closely reflect its purpose, and to prevent any confusion with the Council's Long Term Transport Strategy.
- 1.3 The Parking Policy 2020 has also been updated to reflect developments in other fields, for example on air quality, carbon reduction and the climate emergency.

2.0 Recommendations

That Cabinet:

- 2.1 Approves the Parking Policy 2020 attached as Appendix A to this report, superseding the Council's 2015 Parking Strategy; and
- 2.2 Specifically notes and confirms the policy revisions set out in paragraph 3.5 of this report that have been introduced since 2015, following Cabinet approval.

3.0 Background

- 3.1 The Parking Policy 2020, set out in full in Appendix A, has been designed to provide a clear, well-written, comprehensive and coherent baseline policy position. It does not introduce new policy, but instead brings together in a practical and informative way relevant and applicable policies from the:
 - 2015 Parking Strategy
 - Changes to parking policy agreed by Cabinet during the period 2015-2020
 - Long Term Transport Strategy
 - Brent Housing's estate parking policy
 - Local Plan Development Management Policies 2016
 - Mayor of London's Transport Strategy 2018
 - London Plan 2016
 - Local Development Framework
- 3.2 The Parking Policy 2020 is designed to be a coherent document setting out the Council's agreed current policies relating to Parking, updated to reflect agreed changes from November 2015 through to March 2020. It has been drafted in an accessible way to facilitate its use in clarifying the Council's parking policy and operational practice for members of the public, and in responding to information requests. The Parking Policy 2020 is compatible with the Council's Long Term Transport Strategy, Local Plan, Air Quality Action Plan and other relevant planning policies.
- 3.3 In light of the fact that this document draws together existing policy, public consultation has not been undertaken in respect of the Parking Policy 2020. As future policy is developed, public consultation will take place in accordance with the Council's vision and core values.
- 3.4 The structure of the Parking Policy 2020 is summarised below: (*Pages*)
 - 1. Introduction 1
 - 2. The Parking Strategy in Context 2-8
 - 3. Brent's Parking Policies in Action 9-34
 - 4. Parking Spaces and New Developments 35-36
 - 5. Parking Charges 37-40
 - 6. Parking Enforcement 41-45
 - 7. Parking Management 46-49
 - 8. Future Challenges 50-51
- 3.5 The key policy revisions made to the baseline 2015 Parking Strategy, and now reflected in the Parking Policy 2020, are summarised below:

Summary of Amendment	Report Section	Previously Agreed

Simplification of vehicle carbon emission banding for resident permits	3.24	Cabinet: 14 March 2016
Introduction of 24-month permits and the changeover to virtual permits	5.5	Cabinet: 24 October 2016
Introduction of a diesel surcharge on resident permits	3.26	Cabinet: 14 January 2019
Introduction of a £25 minimum charge for resident permits	3.24	Cabinet: 14 March 2016
Amendments to the price of daily visitor parking permits	3.31	Cabinet: 24 October 2016
Amendments to business permits, withdrawal of business livered permit and introduction of the Lower Place business-only CPZ	3.42 to 3.43	Cabinet delegation: Operational Director Environment: 03 May 2016
Amendments to school permit eligibility	3.44 to 3.46	Cabinet: 14 March 2016
Updating provision for Blue Badges	3.47 to 3.64	Revision to National Scheme updated by DfT
Revision to the Council's Essential User Permit scheme	3.68 to 3.71	Cabinet: 14 January 2019
Updated information on Council-run car parks, taxi ranks, electric vehicle charging points	Various sections within Report	Update on locations and sites
Revisions to the Wembley Event Day permit scheme	3.115	Cabinet: 14 January 2019
Amendments to permit terms and conditions including maximum permitted vehicle weight of 3.5T eligible for residents permit.	3.24 and Appendix A of Parking Policy 2020	Cabinet: 14 March 2016 and Cabinet: 14 January 2019
Revision to parking policies on Brent Council- managed housing estates	3.175	Housing Management Policy
Revision to how Planning officers manage parking issues in development applications	4.1 to 4.10	Brent Local Plan November 2016
Introduction of cameras to enforce parking and loading restrictions in mandatory cycle lanes introduced in June 2020.	6.21	Civil Enforcement of Parking Contraventions (England) General Regulations 2007

4.0 Legal Implications

4.1 The Parking Policy 2020 document brings together the Council's existing parking policies and sets them out in one policy document, including the policy changes that have been made since the introduction of the Council's previous Parking Strategy in 2015. There are therefore no new specific legal implications directly associated with adoption of the Parking Policy 2020 document. The Council is empowered by the Road Traffic Regulation Act 1984 (as amended), the Traffic Management Act 2004, and other specific secondary legislation to provide parking places on and off the highway, to charge for their use, and to carry out parking enforcement activities.

5.0 Financial Implications

- There are no direct financial implications arising as a result of the adoption of the Parking Policy, as its contents are limited to policies and procedures that the Council has already adopted.
- Any costs linked to implementing the Policy would be met from existing resources. Any additional funding requirement would need to be considered in the light of budget availability.

6.0 Consultation with Ward Members and Stakeholders

- 6.1 Consultation was undertaken with the Lead Member for Environment, Councillor Sheth, during the report's development stage.
- In light of the fact that this document draws together existing policy, public consultation has not been undertaken in respect of the Parking Policy 2020. As future policy is developed, public consultation will take place in accordance with the Council's vision and core values.

7.0 Human Resource / Property Implications

7.1 None, as there are no requirements for changes to staffing levels or accommodation.

Related documents: 2015 Parking Strategy

Long Term Transport Strategy

Report sign off:

AMAR DAVE

Strategic Director of Regeneration and Environment.



London Borough of Brent

Parking Policy 2020

Cabinet on 1	Policy 2020 is 6 November 2	2015. The re	evisions refle	ect changes	2015, a made to	greed by E o Brent Co	3rent's uncil's
parking policie	es and operati	onal practice	s since 2015	5.			

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Appendix 2 - Parking Permit Terms and Conditions

Appendix 3 - Criteria for Personalised Disabled Persons' Parking Places

Appendix 4 - Council-run car parks in Brent

Appendix 5 - London Councils' Standard PCN Codes

1. Introduction

- 1.1 Excellent parking management is an important tool that can contribute towards achieving the Council's wider transport, economic and planning policy objectives. Well thought-out parking policies and effective enforcement can influence travel patterns, sustain the local economy, balance competing demands for road space, relieve congestion and contribute to sustainable outcomes.
- 1.2 Conversely, parking which is not properly regulated can exacerbate congestion on the road network, reduce the reliability of public transport, impact adversely on the local economy and create road safety problems. Parking services are highly visible to residents, local businesses and visitors. In particular, enforcement needs to be seen as fair, effective and proportionate if it is to retain public confidence.
- 1.3 Demand for parking in the London Borough of Brent is high. Over time, the Council has introduced a number of measures to control the demand for kerb space. Parking in the south-eastern part of the borough, which is closest to central London, is regulated through Controlled Parking Zones where residents and businesses have the option of purchasing permits. Other parts of the borough also have parking controls, typically in and around busy high street locations, or near railway stations where there may be a demand for parking from commuters.
- 1.4 Another key feature is the presence of Wembley Stadium. On major event days the local area receives an extremely high number of visitors, placing significant pressure on local parking, and for this reason, the area surrounding the stadium also has parking controls to protect parking for local residents and businesses.
- 1.5 This Parking Policy has been prepared to meet a key commitment made in the Council's Long Term Transport Strategy 2015-2035:
 - The Parking Strategy will seek to analyse the current situation regarding parking in Brent and identify problems and opportunities for improvement. The Strategy will seek to achieve a balance between the needs of residents to park, access to local employment and local retail and service providers, and the need to reduce trips by conventional cars throughout the borough.
- 1.6 Accordingly, this document outlines the Council's parking policy as well as providing local solutions for parking problems in the area. It sets out how parking issues are currently dealt with, identifies the priorities for enforcement and for future investment, and sets a framework from which the service can be developed. This Policy builds on existing best practice undertaken within the borough and refines it to meet the current and emerging challenges.
- 1.7 This Policy replaces its direct predecessor, the Council's Parking Strategy 2015.

2. The Parking Policy in Context

- 2.1 Brent is home to around 335,300 residents and the population is expected to rise 25% by 2041, according to Brent Open Data 2019. It is the seventh largest borough in London. The borough has a population density of 7,652 people per square kilometre, the 14th highest density in England, and the highest in Outer London. The borough covers an area of 4,325 hectares - almost 17 square miles - between inner and outer North West London. It extends from Burnt Oak, Kenton and Kingsbury in the North, to Harlesden, Queen's Park and Kilburn in the South. Brent is bordered by the London Boroughs of Barnet to the east, Harrow to the north and Ealing to the west. It has short boundaries with the inner London boroughs of Camden. Westminster, Hammersmith and Fulham, and Kensington and Chelsea in the south.
- 2.2 The North Circular Road divides the less densely populated northern part of the borough from the more densely developed south. In the north of the borough, in areas such as Kenton and Kingsbury, a higher proportion of the population is retired, and cycling is used for less than 1% of all journeys. Conversely, in southern areas such as Brondesbury and Queens Park, cycling rates are much are higher at 7-11%.
- Brent is the most ethnically diverse place in Britain, with more than 120 languages spoken. The borough is home to the iconic Wembley Stadium, Wembley Arena and the Swaminarayan Hindu Temple in Neasden, and is accustomed to the successful staging of many major events. This means that Brent is the destination for thousands of British and international visitors every year. Fortunately, it is served by some of the best road and rail transport links in London, with 26 rail, Overground and tube stations, and several others just beyond the borough boundary.
- Despite these strengths Brent is ranked amongst the top 15 per cent most deprived areas in the country. This deprivation is characterised by high levels of long-term unemployment, low average incomes and a reliance on benefits and social housing. Children and young people are particularly affected with a third of children in Brent living in a low income household and a fifth in a single-adult household. Living in poverty generally contributes to lower educational attainment, poorer health and wellbeing, and social isolation.
- Despite its large population, Brent does not have a metropolitan-scale shopping 2.5 centre. Many of the shopping and leisure demands of a large number of Brent residents are currently met by Metropolitan Retail Centres (as defined by the London Plan) in Harrow, Ealing and Shepherd's Bush, together with the Regional Centre at Brent Cross, all of which are outside the borough.
- Brent's largest centre, Wembley, is classified by the London Plan as a Major Centre. Wembley is also classified as an Opportunity Area, defined as having "significant capacity to accommodate new housing, commercial and other development linked to existing or potential improvements to public transport accessibility". It is also identified as a Potential Outer London Development Centre in the leisure / tourism / arts / culture / sports category.

2.7 The London Plan identifies six District Centres that lie wholly within Brent, and two that lie partly in Brent and partly in the London Borough of Harrow:

Ealing Road

Harlesden

Neasden

Kenton (also Harrow)

Preston Road

Wembley Park

• Willesden Green

Kingsbury (also Harrow)

In addition, the Council's Local Development Framework (LDF) Core Strategy, adopted in 2010, identified a further Major Centre and three additional District Centres which lie partly in other boroughs. These are:

- Kilburn (Major Centre also Camden)
- Burnt Oak (also Barnet)
- Colindale (also Barnet)
- Cricklewood (also Barnet & Camden)
- 2.8 Park Royal, which lies partly in Brent and partly in Ealing, is classified by the London Plan as an Opportunity Area. On 1st April 2015, the Old Oak and Park Royal Development Corporation came into existence. The Development Corporation is the local planning authority and regeneration agency for the 650 hectare site.
- 2.9 The LDF identifies five growth areas in the borough:
 - Wembley

South Kilburn

• Burnt Oak & Colindale

Church End

Alperton

Within these five growth areas, Wembley will be the preferred destination for town centre uses including new retail growth, office development, and new hotels. In the other four growth areas, mixed use development will be encouraged in accordance with a series of more detailed place-making policies appropriate to each area. These five areas will also be the location of nearly 90% of the 21,000 new housing units forecast to be built in the borough by 2026.

- 2.10 The Wembley Area Action Plan is important in determining how Wembley develops over the next 15 years. The Plan, agreed in January 2015, builds on the council's vision to develop Wembley as a destination which will help drive the economic regeneration of Brent, and further promote its cultural and leisure offer attracting visitors throughout the day and evening
- 2.11 These potential changes will inevitably lead to increased demand for movement to, from and within the borough, with particular focus on the areas identified for growth. While the availability, frequency and reliability of public transport and the existence of high quality facilities for walking and cycling will influence the way people travel, there will nevertheless be an unavoidable impact on loading, deliveries and parking.
- 2.12 The main demand for both on-street and off-street parking in the borough's town centres occurs from Monday to Saturday across the working day between 8am and 6:30pm, on Sundays during the retailing hours of 10am to 5pm, and during special

events, particularly in the Wembley area. The majority of drivers seeking long-stay parking in the Borough, for which there is heavy demand, are likely to be commuters who travel at peak periods when traffic levels are at their highest. Conversely, many drivers seeking short stay parking are more likely to be shoppers, most of whom tend to avoid travelling in peak periods.

Car ownership

2.13 The 2011 Census indicated that car ownership in Brent was slightly below the London average, ranking 19th out of the 33 London authorities. Of the Outer London boroughs, only Haringey and Newham had fewer households with access to a car. As the table below shows, the proportion of households with access to a car fell between 2001 and 2011, and by 2011 was similar to the pattern that existed in 1991.

Table: Household	car owner	ship in	Brent
-------------------------	-----------	---------	--------------

No. of cars/	1991		2001		2011	
vans per household	No. of h/h	%	No. of h/h	%	No. of h/h	%
0 (car-free)	40,756	43.4	37,287	37.3	47,417	43.0
1	38,153	40.6	42,606	42.6	43,598	39.5
2	12,705	13.5	16,207	16.2	14,884	13.5
3+	2,350	2.5	3,891	3.9	4,385	4.0
Total Households	93,964	100	99,991	100	110,286	100

Car use

- 2.14 The 2011 London Travel Demand Survey indicated that, between 2005/06 and 2009/10, residents of Brent made an average of 3.1 trips each day, the eleventh highest rate of the 33 London authorities and slightly higher than the averages for both Outer London and Greater London as a whole (both 2.2 trips per day). 44% of these trips by Brent residents were made by car or motorcycle. This was a higher percentage than any Inner London borough, but was the sixth lowest of the 19 Outer London boroughs.
- 2.15 Use of buses in Brent was equal second highest in Outer London (16% of trips) and use of the Underground was also equal second highest in Outer London (7% of trips). Walking accounted for 29% of trips and cycling 1%.
- 2.16 Although the proportion of households without access to a car has risen (see above), the continuing increases in population may generate additional demand for parking in some locations within the borough.
- 2.17 14.5% of the population (2011 Census) were people over 60 who had access to free travel on public transport, either through the Freedom Pass (which is available from the state retirement age) or the London-only 60+ Oyster Card. A higher proportion of older people live in areas in the north of the borough that are less well served by public transport. In addition, this group is likely to have more health problems than younger members of the community. Thus the availability of free transport is to a degree offset by a higher likelihood of using a car as a first choice for travel.

Parking Policies

- 2.18 The Council's parking policies must comply with the law (particularly the Traffic Management Act 2004); and must have regard to the Secretary of State's Statutory Guidance to Local Authorities on the Civil Enforcement of Parking Contraventions, the latest version of which was issued in November 2015. This Guidance states that enforcement authorities should design their parking policies with particular regard to:
 - managing the traffic network to ensure expeditious movement of traffic, (including pedestrians and cyclists);
 - improving road safety;
 - improving the local environment;
 - improving the quality and accessibility of public transport;
 - meeting the needs of people with disabilities, some of whom will be unable to use public transport and depend entirely on the use of a car; and
 - managing and reconciling the competing demands for kerb space.
- 2.19 The Council's parking policies also sit within the context of the Council's overall transport policies. These are set out in the Council's 2015-2035 Long Term Transport Strategy (LTTS). The LTTS sets out five objectives, all of which are relevant to this Parking Strategy:

Objective 1

Increase the uptake of sustainable modes, in particular active modes

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

Objective 2

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

This is not about reducing the total number of trips on the network as mobility is highly important for local economic growth. However, trips can be re-timed to avoid peak hours or take place in less polluting vehicles.

Objective 3

Support growth areas and town centres to enable acceptable development

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

Objective 4

Reduce KSI* incidents and slight accidents on Brent's roads

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

Objective 5

Reduce the exposure of Brent residents to PM and NO2 generated by the transport network

It has become apparent that particulate matter and nitrogen dioxide generated by a variety of sources has a significant adverse impact on the health of those who are regularly exposed. A proportion of these pollutants are generated by transport. Reduction in exposure of Brent residents could result in significant health benefits.

- 2.20 The LTTS also sets five priority areas that will provide a focus for further work:
 - Road safety;
 - Air Quality;
 - Health;
 - Congestion; and
 - Growth and regeneration.
- 2.21 Both the Mayor of London's Transport Strategy (2018) and the London Plan (March 2016) contain London-wide policies on parking, to which the Council must have regard. In particular, the London Plan sets out a framework of standards for the provision of off-street parking in new developments, including standards for cycle parking, car clubs, disabled parking, and the provision of parking for electric vehicles and consideration should also be given to the implications for air quality. These issues are considered separately in this Strategy.

Other relevant policies

- 2.22 Brent's Local Plan is a collection of planning documents that, in conjunction with national planning policy and the Mayor's London Plan, sets out the strategy for future development in Brent.
- 2.23 The Local Development Framework (LDF) is the Council's main planning policy document. The Brent Core Strategy is the first and key component of the LDF and the Core Strategy sets out the spatial vision of how Brent should be in 2026 and how this will be achieved. The LDF's Strategic Objective 8 deals with Transport Infrastructure as follows:

Strategic Objective 8

Reducing the Need to Travel and Improved Transport Choices - by:

- Completing first class retail and other facilities in Wembley that reduce the need to travel to other centres.
- Improving key transport interchanges in Wembley, Alperton, First Central and Queen's Park.
- Promoting access by public transport, bicycle or on foot, and reducing car parking standards for growth areas because of their relative accessibility.
- Reducing modal share of car trips to Wembley from 37% towards 25%.
- Completing at least 5 car-free schemes per annum in the Plan period.
- 2.24 The Core Strategy Sustainability Appraisal adopted a number of additional objectives:
 - S7 To improve accessibility to key services especially for those most in need

- EN1 To reduce the effect of traffic on the environment
- EN3 To improve air quality
- EN7 To reduce contributions to climate change and reduce vulnerability to climate change
- EC5 To encourage efficient patterns of movement in support of economic growth
- 2.25 The **Wembley Area Action Plan** (WAAP), published in January 2015, includes transport and parking policies intended to support the planned development and expansion of the Wembley area. Specifically in relation to parking, the WAAP sets out proposals for new car parks on the edge of the town centre, including coach parking, and also adopts parking standards for new developments in Wembley.
- 2.26 The Council's Parking Policy sets out a priority hierarchy for on-street parking as follows:
 - Local disabled resident parking *
 - Non-local disabled parking *
 - Local resident parking *
 - Essential worker in the delivery of public service
 - Local business operational parking/servicing
 - Short-stay shopper/visitor parking
 - Long-stay shopper/visitor parking
 - Long-stay commuter parking
 - * Includes residents' additional parking requirements for visitors and tradespeople (e.g. builders) who may require operational parking all day.

This priority hierarchy has been specifically referred to by the Council when considering amendments to parking charges since 2006, and will continue to be taken into account when assessing future parking need.

2.27 Finally, the Council's latest published 2018/19 Annual Parking Report confirms that Brent is committed to providing a fair, consistent and transparent approach to parking and traffic enforcement. Publishing clear statistical and financial information will help achieve these objectives. Reporting is also an important part of accountability and transparency and is set out in The Secretary of State's Statutory Guidance to Local Authorities on the Civil Enforcement of Parking Contraventions.

The Council's objectives for the parking service

2.28 In the light of the above, the Council has adopted the objectives listed below for the operation and development of its parking service.

Policy objectives

The Council seeks:

- To improve the safety of all road users.
- To provide affordable parking spaces in appropriate locations to promote and serve the needs of the local economy.

- To assist in providing a choice of travel mode and enable motorists to switch from unnecessary car journeys, to reduce traffic congestion, carbon emissions and pollution.
- To promote carbon reduction and improved air quality by encouraging the use of vehicles with lower emission levels
- To support local businesses by facilitating effective loading and unloading, and providing allocated parking where appropriate.
- To provide the right balance between long, medium and short stay spaces in particular locations
- To achieve a regular turnover of available parking space in shopping and commercial areas, to maximise business activity and promote economic growth
- To assist the smooth flow of traffic and reduce traffic congestion.
- To enable residents to park near their homes.
- To facilitate visitor parking, especially by those visiting residents with personal care needs.
- To assist disabled people with their parking needs, and enhance their access to local shops and key amenities
- To prioritise parking controls to support the needs of local residents and businesses over event traffic.

Operational objectives

The Council aims:

- To set a level of charges which balances demand and supply for parking spaces across the borough.
- To provide an efficient service which constantly seeks to improve.
- To be fair, consistent and transparent in our dealings with customers.
- To publish clear statistical and financial information on a regular basis.
- To consult parking account holders on any substantial changes to parking permits and prices, and undertake borough-wide consultation where deemed relevant.

3. Brent's Parking Policies in Action

- 3.1 The Council's overall approach to parking and enforcement is to work with residents and other stakeholders, to identify local problems and develop appropriate and proportional local solutions, which support and complement the Council's wider polices and strategies. These solutions include:
 - the prohibition of parking where this would compromise safety and the free flow of traffic;
 - using parking controls to manage the demand for kerbside parking space;
 - providing convenient on-street parking for residents, visitors and businesses;
 - providing off-street parking (car parks) in areas where demand is greater than can reasonably be accommodated at the kerbside;
 - ensuring that new developments provide sufficient parking to avoid adding to the demand for parking on the street; and
 - adopting approaches such as car clubs and car-free development that reduce the demand for parking space and encourage the use of more sustainable forms of transport.

Waiting restrictions (red and yellow lines)

- 3.2 The majority of yellow-line waiting restrictions in Brent are on strategic and distributor roads and have been introduced largely to promote safety, assist buses, enable servicing and aid efficient movement of traffic. Where practicable, short-stay parking bays are also provided on these roads. Red-line waiting restrictions on the Transport for London Road Network (TLRN) are the responsibility of TfL, but aim to meet similar objectives on London's busiest roads.
- 3.3 Elsewhere, waiting restrictions have been introduced to remove obstructive or unsafe parking at locations such as close to junctions, on bends, outside schools and where the visibility of other motorists is obstructed. Special arrangements apply to protect residents' parking when events take place, especially in the Wembley area. In addition, restrictions are often placed in narrow streets, where parking would otherwise take place on both sides, to assist the emergency services in obtaining access.
- 3.4 Waiting restrictions across the borough apply for a number of different time bands; many restrictions were introduced several years ago covering a standard working day from 8.00 or 8.30am to 6.30pm. Over the last 20 years the borough has seen increased traffic flows and congestion, more flexible working arrangements and the growth of evening and Sunday trading. As a result, peak traffic periods have spread and the peak times for parking demand have changed.
- 3.5 To address this process of change, the Council reviews restriction time bands as part of a wider process by which waiting restrictions are regularly reviewed and amended in order to improve safety, continue meeting local needs, and rationalise provision in order to reduce ambiguity or confusion for drivers.

- 3.6 The Council sees the introduction of restrictions into residential streets as a last resort. This only takes place where safety is compromised by dangerous or obstructive parking, or where the bulk of the demand for kerbside parking is from people from outside the local area and is detrimental to residential and community activities.
- 3.7 The views of residents and other frontages are always taken into account in deciding whether controls should be introduced.

Legal powers

The Council is empowered by the Road Traffic Regulation Act 1984 (as amended), the Traffic Management Act 2004, and other specific legislation to provide parking places on and off the highway, to charge for their use, and to carry out enforcement activities. The Greater London Council (General Powers) Act 1974 (as amended) bans footway parking in London.

On-street parking

- A survey in 2014 indicated that there were then approximately 88,000 on-street parking places, both controlled and uncontrolled, available across the whole of Brent. Over large areas of the borough, particularly in the north and west, on-street parking remains available to motorists free of charge or restriction. In these areas, there are only limited lengths of kerbside waiting and loading restrictions in place on-street, including those necessary to ensure road safety.
- 3.10 In areas of parking control, residents can purchase virtual vouchers to enable their visitors to park. Elsewhere, ad hoc on-street visitor parking is managed by the use of Pay and Display (P&D) bays, which normally require a virtual booking or a valid ticket or permit to be displayed in the windscreen of the vehicle parked in a defined bay. Pay and Display machines are located near shops and businesses within areas of controlled parking across the borough. Payment by mobile phone, which does not require a ticket to be displayed, has been available since 2012. It is an increasingly popular method of payment, accounting for over 75% of transactions in 2019.
- 3.11 As the use of mobile telephone (cashless) parking increases, the number of P&D machines is reducing - particularly in residential areas. We do still maintain an option to pay with cash in most areas; this will be kept under review. A mobile application (app) is available which increases the convenience of cashless parking, for example by sending text reminders when parking sessions are due to expire.
- 3.12 The main areas of parking control also have bays reserved for local residents, or bays shared between residents and paying visitors. In some places there are also bays reserved for motorcycles, businesses, disabled people, doctors, car club vehicles and loading.
- 3.13 Current shopping and business opening hours mean that in some areas there can be similar, and sometimes higher, levels of parking on Sundays and Bank Holidays than on normal weekdays or Saturdays. For this reason, parking controls apply on Sundays in a small number of locations as follows:

Zone Location Ealing Road

KR Kensal Green (part zone only)

T Brentfield Road W Wembley Hill

Parking controls also operate on Bank Holidays in some busier areas. There is no enforcement on Christmas Day. However there is Bank Holiday enforcement on Boxing Day in the four zones listed above, plus zones KG (Kilburn Lane) and KM (Malvern Road).

Controlled Parking Zones

- 3.14 There are over 40 formal Controlled Parking Zones (CPZs) in the borough as well as other areas where some controlled parking operates without there being a formal CPZ. The distinguishing feature of a formal CPZ is that the hours of operation of the restrictions are displayed on signs at the entrances to the area. The hours of control that apply to single yellow lines and to permitted parking bays are usually the same, and it is not necessary to provide signs at each separate length of yellow line.
- 3.15 The main exceptions to the uniform time restriction within a CPZ are double yellow lines, which prohibit parking "at any time" (i.e. 24 hours a day, every day) and do not require signs in addition to the lines themselves. Any other exceptions must be specifically signed as having different hours of control to the general hours of the scheme in question.
- 3.16 A full list of CPZs and their hours of operation is contained in Appendix 1.

Parking permits

- 3.17 The Council issues a range of parking permits which enable the permit holder to park on-street in a bay designated for a particular type of user. The most common types of permit are for residents, residents' visitors and businesses. Permits are of two general types: those which allow the holder to park in a bay reserved only for that type of permit holder (such as resident's permit within a particular zone), and those which allow the user to park in a range of different bays (such as an Essential User Permit during operational hours). The Council launched its on-line parking permit system in 2013/2014.
- 3.18 A permit does not guarantee the holder a dedicated space outside an individual address, nor is it a guarantee that there will be sufficient kerbside parking space available to cater for all those who may have permits to park in any particular road or zone at any one point in time.
- 3.19 Permits are subject to terms and conditions. These can be found at Appendix 2, and on the Council's website. These conditions include a limit on the size of a vehicle for which a permit may be obtained, and also on the number of permits which may be obtained under particular circumstances.

Residents' permits

- 3.20 The Council will issue a resident's permit on request to those people who:
 - have a permanent address within a permit parking area and are able to provide evidence of this:
 - prove that they are the keeper of the vehicle for which the permit is sought by providing details of ownership or a leasing agreement;
 - agree to meet the terms and conditions shown at Appendix 2; and
 - pay the applicable fee.

Applications are made online, and the validity of the resident's address and the vehicle details are checked electronically.

- 3.21 The maximum number of residents' permits that can be purchased per household is three. Non-residents are not eligible for a Resident's Parking Permit.
- 3.22 The resident permit enables the holder to park in any resident bay, and in Shared Use (Resident/Pay & Display) bays, within the Zone shown on the permit. However, a permit does not give the holder the right to a parking space immediately outside their home or in their own street, nor does it guarantee the availability of a parking space. Neither does it allow the holder to park in bays reserved for other classes of vehicle, such as doctors' bays or car club bays.
- 3.23 Permits are only available in respect of vehicles that do not exceed a maximum length of 6.5m, a maximum height of 2.5m and a maximum weight of 3.5 tonnes.
- 3.24 Residents' parking permits are priced according to vehicle emissions and the number of vehicles in a household. The Council has established three Vehicle Bands as set out in the table below. The minimum charge for a permit is £25.00. Residents have the option of purchasing a 24-month, 12-month, 6-month, or 3-month permit.

Vehicle emissions:	Low	Standard	High
Vehicle emissions (gCO2/km) of passenger vehicles registered on or after 1 March 2001	Less than 110	110-200	201+
Cylinder capacity of engine (cc) of passenger vehicles registered before 1 March 2001 and goods carrying vehicles	Less than 1101	1101-2400	Over 2400

- 3.25 The charge for the second permit in a household is higher than the charge for the first, and the charge for a third and final permit is higher than the charge for the second permit.
- 3.26 In June 2019, a surcharge on the price of a resident's parking permit in CPZs was introduced for all diesel vehicles.

Shared use parking

3.27 In order to allow short stay parking for visitors in predominantly residential areas, some bays have been designated as "shared use". Shared use bays are available for use both by resident permit holders, and by the general public as pay and display bays. This allows visitors to the area to make use of the parking space vacated by residents who take their cars out of the area during the day.

Visitor permits

- 3.28 Residents who live in a controlled parking zone may purchase permits for use by their visitors, removing the need for a visitor to find a paid-for on- or off-street parking space. There are five specific options:
 - visitor household permits;
 - daily visitor parking;
 - Temple (T) zone visitor permit;
 - Wembley Hill (W) and Ealing Road (E) zone visitor permits (6.30pm to 9pm); and
 - event day visitor permits.
- 3.29 A visitor household permit is a paper permit which displays the name of the resident's street. It allows visitors to park in any resident or shared use bay, but only in the named street (or part of the street) within the zone shown on the permit. The permit may be displayed on any vehicle. Each household may only hold one visitor household permit.
- 3.30 All visitor household permits are charged at a flat rate, and do not depend on the resident having a car for their own use.
- 3.31 Visitor parking vouchers are available to residents who live within a controlled parking zone and allow residents to book parking for their visitors in a resident parking bay within the zone that the resident lives. Visitor vouchers are electronic and require residents to set up a parking account, following which visitor vouchers can be booked online by telephone or by text. A minimum of five vouchers can be purchased at a time. Visitor parking prices are linked to the cost of public transport (bus fares) to encourage people to consider swapping to more sustainable modes of transport. Vouchers are available for two hour, four hour or all day parking session. Vouchers are activated by providing the Council with the visitor's vehicle registration number, date and start time when using the 2 hour and 4 hour vouchers. In order to manage demand for parking spaces, there is a maximum annual cap of 300 bookings per household.
- 3.32 The resident is issued with a voucher reference number. Civil Enforcement Officers will then have immediate access to the voucher information on their hand-held devices. There is nothing to display on the vehicle. Once a visitor parking session has been booked it cannot be cancelled.
- 3.33 Controlled Parking Zone T (Temple) has 24-hour parking controls, while Zones W (Wembley Hill) and E (Ealing Road) have controls that extend from 8 am to 9 pm every day including bank holidays. Special visitor permit schemes have been

- introduced to allow residents of these zones to receive visitors outside the hours of peak parking demand.
- 3.34 The **Temple Zone visitor permit** allows residents' visitors to park between 6.30pm and 8am every day. Only one Temple Zone visitor permit can be purchased per eligible household.
- 3.35 The W and E zone visitor permit allows residents' visitors within zones W and E to park between 6.30pm and 9pm and all day Sunday. Only one W or E zone visitor permit can be purchased per eligible household.
- 3.36 Event day visitor permits are discussed in the section on Wembley Event Day Parking.
- 3.37 Residents of private roads or car free developments are not entitled to visitor permits.

Temporary courtesy permit

- 3.38 Temporary courtesy permits are issued with a one month duration. A fee is payable and the cost is not emissions-based. Typically the circumstances in which a courtesy permit is issued are:
 - the applicant has just moved into Brent and cannot yet authenticate their new address:
 - to cover a short period between buying a new vehicle and selling the old one; or
 - the annual permit has expired and the resident is moving out of Brent in less than three months.

Replacement vehicle permit

3.39 Replacement vehicle permits are available to existing permit holders whose normal vehicle is unavailable and who are temporarily using another vehicle. They are typically used by permit holders who have use of a garage courtesy car or a shortterm rental vehicle. There is a charge for the issue of a replacement permit.

Business permits

- 3.40 Business permits are available on request to local firms who are able to apply for up to a maximum of three permits per business, for each zone in which the business has premises. This is subject to providing the necessary proof of entitlement. The permit allows the vehicle to park in any permit holders bay within the same CPZ that the premises is based in without restriction. The permit does not exempt the vehicle from any other restrictions, so business permit holders still have to pay if they park in a Pay and Display bay, and they may not park in other reserved bays such as disabled bays (unless the driver or passenger is using a Blue Badge), car club bays, doctors' bays, etc.
- 3.41 Business permits are specific to a named CPZ and priced at a flat rate, not according to vehicle emissions. Permits are available for 12-months, 6-months or 3-months. Business permits are virtual, and vehicles will be automatically covered to park from the permit start date. The Council no longer offers Business Liveried Permits.

Business Permits for the Lower Place Industrial Estate

- 3.42 In February 2016 the Council introduced its first business-only Controlled Parking Zone, in Stonebridge Ward. The Lower Place Business CPZ allows businesses to purchase up to three vehicle-specific permits (including motorcycles) used by that business. Given that the Lower Place Industrial estate is entirely populated by business premises, who are in effect the 'residents' of the area, the resident emissions-based permit pricing model applies. The diesel surcharge provision also applies.
- 3.43 Also introduced was a new Business Address Permit, aimed at businesses that experience a regular turnover of visiting motor vehicles as part of their day to day operations e.g. repair workshops. The permit operates in a similar way to the existing Visitor Household permit; it is non-vehicle specific and allows the vehicle to park anywhere on street within the CPZ area. Permits are limited to a maximum of 3 per business and are issued subject to the business demonstrating that they are essential to its day to day running. The Business Address Permit is now offered in all CPZs.

School Permits

- 3.44 All schools located within CPZs can purchase up to 3 business permits for staff at the same price, terms and conditions as local businesses. These permits are restricted to the CPZ within which the school is located.
- 3.45 The council actively encourages all schools to produce a School Travel Plan (STP) which includes information about the school and pupil & staff modes of travel. STPs are aimed at reducing car use and must include a measurable action plan outlining the actions that the school intends to take to meet its targets and objectives.
- 3.46 Schools in CPZs with accredited STPs are also able to purchase school permits for staff. Schools with bronze accreditation are allowed three additional permits; schools with silver, six; and schools with gold accreditation, nine. This type of school permit offers a 25% discount on the price of business permits, recognising that staff only require parking space near the school during term time.

Parking for Disabled People

3.47 There is a national scheme for issuing Blue Badges to disabled people who meet national eligibility criteria. Eligibility for a Blue Badge is either automatically passported if the applicant is in receipt of one of a range of benefits, or is determined locally by the Council, following an assessment of the applicant's level of mobility. On 30 August 2019, The Department for Transport updated their guidance on people who automatically get a Blue Badge. The scheme allows holders of Blue Badges a range of parking concessions to improve accessibility. These concessions include dispensations from paid on-street parking, and also allow parking on yellow lines for up to three hours unless a ban on loading or unloading is in force.

- 3.48 The Badge is issued to the individual, not to the vehicle, and can be used in any vehicle so long as the holder is travelling in it.
- 3.49 Legislation allows the introduction of marked on-street disabled parking bays, in which the holders of Blue Badges are entitled to park if their permit is displayed in the windscreen of the vehicle that they are using. Motorists without a Blue Badge who park in one of these bays are liable to enforcement action.
- 3.50 The use of a Blue Badge to obtain the above concessions is only permitted if the disabled person, to whom the Badge has been issued, is a driver or passenger in a vehicle at the time at which parking takes place. Any misuse of Badges is an offence, and in such cases the Badge may be withdrawn from the disabled person.
- 3.51 Residents of England qualify automatically for a Blue Badge if they are aged two or over and one of the following applies:
 - they are registered blind
 - they get the higher rate mobility component of disability living allowance (DLA)
 - they have been awarded 8 points or more in the 'moving around' activity of the personal independence payment (PIP)
 - they get war pensioners' mobility supplement
 - they have received a lump sum payment from the Armed Forces and Reserve Forces Compensation scheme (within tariff levels 1-8).
- 3.52 Anyone over two years old *may* be eligible for a Blue Badge, if they either:
 - have a permanent and substantial disability which means they cannot walk, or makes walking very difficult; or
 - drive a motor vehicle regularly and have a severe disability in both arms, making it very difficult or impossible to operate parking meters.
 - have a terminal illness, which means they are unable to walk or find walking very difficult and have a DS1500 form
 - if they are always a significant risk to themselves or other people when they are near vehicles, in traffic or car parks
 - they often become extremely anxious or fearful of public or open spaces
- 3.53 A parent of a child who is younger than three years old may also apply for a Blue Badge. The child must have a specific medical condition which means that they either:
 - must always be accompanied by bulky medical equipment which is very difficult to carry around; or
 - need to be kept near a vehicle at all times to get emergency treatment for a condition when necessary.
- 3.54 People who do not automatically qualify for a Blue Badge may have an application agreed following a desk-based assessment which considers the evidence (usually medical) that the applicant can supply to confirm their mobility problems. Otherwise the applicant will be subject to a mobility assessment to determine whether their level of mobility is such as to qualify for a Badge.

3.55 The Council has introduced the statutory maximum fee of £10 for issuing a Blue Badge.

Parking by disabled residents

- 3.56 With increasing numbers of cars parking in the Borough's streets, many residents experience difficulty parking close to their homes. Whilst all drivers can suffer inconvenience at times, disabled drivers are more seriously affected. In recognising the special needs of disabled drivers, Brent Council seeks to assist those who are most disadvantaged by mobility problems.
- 3.57 Where a resident has sufficient room on their property to accommodate a vehicle, the Council's has a policy and application process for a dropped kerb if residents want to park their vehicle off street. The Council can carry out works to drop the kerb and construct a strengthened ramp in the footway to enable the resident to access their property at the owner's expense. In some cases, Blue Badge holders may be able to claim some financial assistance to carry out this work, as part of a personal care package. However, this option may not be possible if there is insufficient space, and in some circumstances it may be necessary to seek planning permission for the changes.
- 3.58 If a Blue Badge holder experiences problems with parked vehicles obstructing their driveway access, a white line or "access bar" can be marked on the road free of charge. Access bars are discussed in more detail later in this document.

Disabled Persons' Parking Places (DPPP)

- 3.59 A Disabled Person's Parking Place is a parking space marked on the public highway by a white-painted box with a sign indicating that it is for the use of blue badge holders only. The space is defined by a Traffic Management Order, which makes it an offence for any vehicle to be parked there without displaying a valid blue badge. The process for making a Traffic Management Order means that anyone affected by the proposed bay can submit an objection, which must be considered before a decision is reached on whether to designate the space.
- 3.60 Even when a bay is requested by a householder, it is not reserved for their personal use. The disabled person's parking place is still available for any blue badge holder to use, although in practice this may be a rare event.
- 3.61 The Council's criteria for granting a disabled person's parking place are as follows:
 - The applicant must be a registered Blue Badge holder.
 - Where off-street facilities are available, a bay may be provided if the applicant can demonstrate that the facilities are either unsuitable for the use of a disabled person due to the nature of their disability, or unsuitable for their vehicle.
 - The applicant must use and drive a vehicle kept at the premises, except where the applicant:
 - a) requires substantial physical assistance from the driver of the vehicle when entering and leaving the vehicle and the driver is generally the only person available to assist the passenger: or

- is sufficiently mentally or physically incapacitated to necessitate constant supervision by the driver of the vehicle and the driver of the vehicle is the only person available to effect this supervision.
- The driver should also live at the applicant's address.
- All Disabled Person's Parking Places are operational 'at any time'.
- Disabled Persons' Parking Places will only be approved at locations where road safety will not be adversely affected by their provision.
- Where Disabled Persons' Parking Places are considered to be no longer necessary due to a change in circumstances, or are reported to be unused, they will be removed.
- 3.62 Disabled Person's Parking Places are not provided for:
 - Dial-a-Ride, taxis, hospital drivers or others, for the purpose of picking up of or setting down passengers.
 - Non-disabled visitors or carers.

Personalised bays for disabled people

- 3.63 In addition to providing ordinary Disabled Person's Parking Places as set out above, the Council has its own local scheme to assist residents with a greater degree of disability. A personalised bay reserves the space for a named user, and other Blue Badge holders may NOT park in the bay.
- 3.64 The Council's main criteria for granting a personalised bay are as follows:
 - Applicants must hold a Brent issued valid Blue Badge.
 - Applicants must be receiving the DLA Higher rate of Mobility Component for an indefinite period or Personal Independence Payments (PIP) enhanced rate of Mobility component. The higher rate of Attendance Allowance will also be accepted for applicants aged 65 or over.
 - Applicants must be driving their own car or nominate a carer who drives them, the carer is in receipt of the Carer's Allowance reward.
 - Applicants must have no access to off street parking facilities, a bay may be provided if the applicant can demonstrate that the facilities are either unsuitable for the use of a disabled person due to the nature of their disability, or unsuitable for their vehicle.
 - The bay will be subject to an annual review.
- 3.65 The full criteria for provision of a personalised disabled bay are set out at Appendix 3.

Off-street parking for disabled people

- 3.66 The Council provides dedicated parking bays for disabled people in most of its car parks. Commercially-run public car parks may also provide dedicated bays.
- 3.67 The Council also places requirements on developers through the planning process to provide stipulated numbers of dedicated off-street parking places for disabled customers, staff and visitors in new developments.

Essential User Parking

- 3.68 The Council operates an Essential User Permit (EUP) scheme to help charitable and public sector organisations to provide essential care and services in controlled parking zones. The scheme was introduced in 2003 and updated in 2019, following a review of the provision and consultation with stakeholders.
- 3.69 The eligibility criteria for issuance of an Essential User Permit (EUP) is "any person who performs a statutory service on behalf of the Council, including social housing management, highways maintenance works and residential or community care management, or is a health visitor, general practitioner, district or community nurse, midwife, chiropodist, dentist or osteopath employed by the National Health Service, or who provides home visiting on behalf of religious or non profit making charitable organisation".
- 3.70 An EUP is only valid whilst the permit-holder is undertaking official duties. This usually means at a clients' house or workplace, and never includes the permit holders' own office or other workplace. In addition, the permit may not be used for official duties within 500 metres of the holder's place of work (for LB Brent staff based at the Civic Centre, this restriction applies within 750m). The permit does not guarantee that a space will be available for the user at any particular location.
- 3.71 Since June 2019, the Council has made a distinction between Essential User Permits issued to NHS, Care and Charity Organisations and those issued to other organisations (these include Council contractors and service providers commissioned by the Council). Permits are priced at a flat rate depending on the category the organisation falls within and are available for 12-months.
- 3.72 Applications for EUPs are made using an online form and require an employer's declaration to be completed and signed to ensure the eligibility criteria has been met.
- 3.73 An EUP entitles the permit holder, whilst undertaking official duties, to park in:
 - a resident permit holders-only bay;
 - a permit holders-only bay; or
 - a dual-use bay (pay & display and permit/resident permit-holders bay).
- 3.74 An EUP does not entitle a holder to park in or on:
 - pay & display only bays;
 - doctors' bays;
 - disabled bays;
 - car club bays;
 - car parks;

- loading bays;
- taxi ranks;
- motorcycle bays;
- yellow line restrictions;
- bus stops;
- a Controlled Parking Zone operated by another borough;
- any place subject to Wembley Event Day restrictions;
- privately-owned land, including housing estates owned by Brent Council; and
- suspended bays.
- 3.75 A full list of terms and conditions is available on the Council's website.

Car Clubs

- 3.76 Car clubs are short-term car rental services that allow their members access to locally parked cars. Payment is by the minute, hour or day. Car clubs are now wellestablished in Brent. These have either come about through planning agreements relating to individual developments, or through the Council working with car club companies to provide on-street bays where car club vehicles can be kept. The Council's Long Term Transport Strategy includes a commitment to draw up a Car Club Management Plan that will aim both to provide encouragement for car clubs in Brent, and also to provide a framework by which space on the highway can be equitably allocated between competing car club operators and private vehicle owners.
- 3.77 Car clubs offer significant benefits including:
 - reducing on-street parking stress, by reducing the number of parked cars, encouraging car sharing and helping some residents to give up private car ownership;
 - reducing traffic congestion (research demonstrates that car club members typically reduce their car mileage in favour of more sustainable means of travel);
 - achieving emissions reductions, contributing to the Council's commitment to improve air quality in Objective 5 of the Long Term Transport Strategy; and
 - reducing costs to individuals who only use a car occasionally.
- 3.78 The Council facilitates the provision and enforcement of on-street car-club bays in the borough, and will seek to increase their number where there is a clear demand. The Long Term Transport Strategy includes a target to increase the number of car club vehicles available to Brent residents by 20% by 2035.
- 3.79 Car club bays are reserved for the use of car club vehicles at any time, and exclude other permit holders and disabled drivers. The Council also supports flexible car club operating services across Brent. Flexible car clubs do not require users to park the vehicle in a dedicated car club bay; customers of this type of car club may park free of charge in resident bays across the borough, but not in shared use or Pay & Display bays.

Electric vehicles and Electric Vehicle Charging Points (EVCPs)

- 3.80 The Council supports the adoption and use of ultra-low emission vehicles (ULEVs). including electric vehicles, due to their lower carbon emissions and impact on air quality. In addition, the Mayor of London has a policy to improve the availability of electric vehicle charging points across London. Electric vehicles have the potential to help reduce kerbside emissions if they become widely used, although current technology means that they are likely to be a more attractive choice in urban areas where the possibility exists of creating a network of publicly available charging points.
- 3.81 Residents' permits for electric vehicles have a low fee to cover permit administration costs, and electric vehicles are currently exempt from the central London Congestion Charge.

- 3.82 As the number of Brent residents purchasing new electric vehicles is increasing every year, with hybrid (petrol/electric) being the most popular, the Council has faced the challenge of finding potential locations for introducing EVCPs whilst having a minimum impact on the ever increasing pressure for parking.
- 3.83 The Council's Long Term Transport Strategy 2015-2035 makes a commitment to work with Ultra Low Emission (ULEV) charging network operators to enable trips to be completed by cleaner cars.
- 3.84 The Council's Air Quality Action Plan 2017-2022 was approved in November 2017. It gives support to the installation of on-street EVCP's throughout the borough as well as the take up of electric taxis and commercial vehicles.
- 3.85 As of April 2020, four Council car parks have charging points, namely:
 - Brent Civic Centre, Engineer's Way
 - Preston Road
 - St. Johns Road
 - Wendover Road
- 3.86 In addition, as of April 2020, there are a number of other off-street locations in Brent with public charging points:
 - Asda Wembley, Forty Lane
 - London Designer Outlet, Red Car Park, South Way
 - Asda Colindale, Capitol Way
 - IKEA Wembley, Drury Way
 - Ace Cafe, North Circular Road
- 3.87 The potential exists to install more public on-street charging points. Since any bays would have to be reserved for electric vehicles only. Locations for EVCPs are identified by taking into account where electric vehicles are registered in the borough and requests from residents. The Council will take into account future demand and the loss of general public parking before considering whether to install any on-street bays. The Council has recognised that there is a greater demand for EVCPs in the south of the borough where there is less off street parking available. As it is not permissible to have a live electric cable running across the public highway, electric vehicle owners do not have the option to charge their vehicles whilst at home.

Motorcycle parking

- 3.88 Motorcycles i.e. powered two-wheeled motor vehicles (PTWs) are efficient users of road and parking space and, in general, produce less carbon and pollutant emissions than most other motor vehicles.
- 3.89 Motorcycles can be a cheap and convenient means of personal transport. There are a number of areas in the borough where the demand for motorcycle parking is high, for example around key public transport interchanges. The siting of PTW parking facilities needs to be carefully planned, so that they are highly visible to encourage natural surveillance and minimise theft.

- 3.90 The Council provides dedicated on-street motorcycle bays where this is justified by demand and the needs of other highway users. The current locations, as of April 2020, are:
 - Algernon Road
 - Bolton Gardens
 - Buller Road
 - Chichester Road
 - Coventry Close
 - Harvist Road (3 sites)
 - Kilburn Lane (3 sites)
 - London Road
 - Neasden Lane (2 sites)
 - Pember Road
 - Rainham Road
 - Station Parade, Willesden
 - Summerfield Avenue
 - Wakeman Road
 - Warfield Road

- Bayford Road
- Buckley Road
- Burton Road
- Claremont Road
- Dyne Road
- Kempe Road
- Kingsbury Road
- Montrose Avenue
- Oxford Road
- Priory Park Road
- St. John's Road
- Station Terrace, northern arm
- Victoria Road
- Walm Lane
- Willesden Lane (2 sites)
- 3.91 Solo motorcycles can also park free of charge in:
 - pay and display bays
 - resident bays
 - shared use bays
 - permit holder parking bays
 - Council-run car parks in Brent (some of which have dedicated motorcycle bays).
- 3.92 Motorcycles in the Lower Place (LP) controlled parking zone require either a valid permit or parking session to park. Motorcycles can park for free in the short stay section of Disraeli Road car park only.
- 3.93 Motorcycles may not park on yellow lines during controlled hours or on the pavement

Cashless parking

- 3.94 A system for cashless parking payments has been in operation across the borough since 2010. It allows motorists to pay to park their vehicle using a mobile phone or device and a bankcard, instead of using coins in a parking machine.
- 3.95 The system offers a wide range of benefits to customers, including choice of payment method, reminders that their parking session is due to end, and the flexibility to extend their parking session using their mobile phone, thereby eliminating the need to over-book initially.
- 3.96 Benefits to the Council include cost reductions in respect of coin processing, parking machine provision and maintenance, and reduced theft of cash from machines. Many parking machines are reaching the end of their reliable life, and without a transition to cashless parking, the Council would incur the capital cost of replacement.

- 3.97 The Council's current provider of cashless parking services trades as RingGo. Before using the service it is necessary to register, either in advance or at the time of parking, by providing the number plate, colour and make of the vehicle and details of the payment card to be used. There are several ways to pay to park with RingGo:
 - by using an application (app) on a suitable mobile device
 - by calling the phone service
 - by text message
 - through the internet (either via a mobile device or a PC).
- 3.98 When parking, a user is asked to:
 - confirm the vehicle identity;
 - confirm the location;
 - · state the proposed length of stay; and
 - provide the security code from the payment card being used.
- 3.99 There is no charge for registering with RingGo and no charge for downloading or using the RingGo iPhone and Android apps. Motorists can opt to pay a small charge to receive confirmation messages and reminder texts, and pay their provider charges for text messages if using the "text to park" option. If you call RingGo, you will be charged the standard rate agreed with your mobile service provider. If you provide your email address you can opt-in to receive a free email receipt automatically every time you park. Since 2013 the charges for cashless parking stays of more than 30 minutes have been 50p cheaper than for cash payments in Pay and Display bays.

Taxis and Taxi Ranks

- 3.100 There are ten taxi ranks in the Borough, as at April 2020, listed below. The purpose of a taxi rank is to provide residents and visitors with a set location where they can hire a licensed taxi. Ranks are located in places where people are most likely to need a taxi, and there is a particular focus on the Wembley area. The ranks are the only places where a taxi may wait for business in a stationary position. It is an offence for any other vehicle to park in a taxi rank.
 - Bridge Road, Wembley Park. Open 24 hours.
 - Brook Avenue, Wembley. Open 24 hours.
 - Crownhill Road, Harlesden. Open 24 hours.
 - Engineers Way (Wembley Arena). Wembley. Open 15 minutes before to 30 minutes after end of performances.
 - Engineers Way (Wembley market). Open Sundays only.
 - Fernbank Avenue, Sudbury Hill. Open 24 hours.
 - Kingsbury Road, Kingsbury. Open 24 hours.
 - London Road (High Road) Wembley. Open 24 hours.
 - Station Crescent, Sudbury Town. Open 24 hours.
 - Station Parade, Willesden Green. Open 24 hours.
- 3.101 Taxi ranks are designated by TfL in consultation with the Council, and the Council has responsibility for enforcement. The Council will conduct monitoring of stands

- and will continue to liaise with TfL over future arrangements and the provision or alteration of taxi facilities.
- 3.102 The Council's Local Development Framework preserves Policy TRN30 of the 2004 Unitary Development Plan, which says that developments likely to attract significant numbers of visiting members of the public should include adequate taxi parking facilities where boarding and alighting does not obstruct the public highway.

Doctors' Bays

- 3.103 Doctors' parking bays are issued to registered practitioners for use at their surgeries, subject to production of proof that the premises are in current use as a surgery. The bays are restricted for use by the individual permit holder. The sign erected next to the bay includes the permit number, to indicate which user is permitted to park in the bay. Restrictions apply "at any time", so no other vehicle may legitimately park in the bay. There is an upper limit of three permits per address.
- 3.104 Doctors' permits do not permit doctors to park elsewhere during home visits. Parking for home visits is covered by the Essential User and Health Emergency Badge schemes.

Health Emergency Badge

- 3.105 The Council is part of the London-wide Health Emergency Badge (HEB) scheme. which is administered by London Councils on behalf of the London boroughs. The HEB scheme is intended to identify doctors' vehicles (and those of other qualifying health professionals) when being used on emergencies. The Badge provides no immunity from parking regulations, but if a vehicle otherwise parked illegally is observed to be displaying a Badge, Civil Enforcement Officers will not issue a Penalty Charge Notice (PCN) if the conditions of use are being adhered to.
- 3.106 Badges are issued to a practice or clinic, not an individual, and can only be used by professionals providing emergency health care. This includes doctors, nurses, midwives and health visitors, but not other para-medical practitioners such as physiotherapists, chiropodists and occupational therapists, or social workers.
- 3.107 The Badge should be clearly displayed by hanging it on the rear view mirror, and the address of the patient being visited must be shown. Badge users attending a medical emergency can park in meter, pay and display bays and residents' bays without paying. If no alternative parking space is available, users can park on yellow lines. At all times, Badge users must ensure they do not cause an obstruction or endanger other road users. Badge users must not stay longer than necessary.
- 3.108 A vehicle displaying an HEB will not normally be penalised without an attempt made to contact the driver at the address shown on the Badge. However, any challenge to a PCN must be individually contested using the normal process.

Wembley event day parking

- 3.109 The size and number of events taking place at Wembley Stadium has led the Council to implement the Wembley Stadium Event Day Protective Parking Scheme. The scheme defines an event day zone where special parking restrictions are operational on all major event days at Wembley Stadium.
- 3.110 Wembley Stadium is a public transport venue. The scheme's restrictions are enforced to ensure that the area remains congestion free, and that minimum disruption is caused to the local community by visitors to the stadium. Anyone parking illegally in the event day zone is liable to receive a Penalty Charge Notice and may have their vehicle removed.
- 3.111 Event day restrictions operate between 8am and midnight on main roads to the stadium, and generally between 10am and midnight elsewhere outside Controlled Parking Zones (i.e. streets which do not have parking controls on non-event days).
- 3.112 In Controlled Parking Zones within the scheme area, the restrictions are 10am to midnight, and zone T (Brentfield Road) which operates at all times.
- 3.113 Also in Controlled Parking Zones within the scheme area, existing residents', business and other permits remain valid. In streets outside the CPZs, the Council offers a range of event day permits as follows:
 - Event day resident permit
 - Event day visitor permit
 - Event day business permit
 - Event day school permit
 - Event day place of worship permit
- 3.114 Originally, Event Day Permits were paper-based and not vehicle-specific.. Residents are required to ensure that the permit is clearly displayed in the vehicle windscreen on event days to avoid being issued with a Penalty Charge Notice.
- 3.115 Since June 2019, all Event Day Permits are issued as vehicle-specific, valid for three years, and a flat rate charge is made to contribute to the administrative cost of issuing the permit. These are also now issued as virtual permits, and the registration number of the registered vehicle is automatically recognised when checked by a Civil Enforcement Officer.
- 3.116 Applicants for an event day resident permit will have their residential status checked in the same way as other applicants for a resident permit. The maximum number of event day permits that can be purchased per eligible household is three. Residents of private roads in the scheme area are also entitled to permits to allow them to park in enforceable parts of the event day zone during an event.
- 3.117 Eligible households can also obtain event day visitor permits subject to a maximum of two per household. Residents of private roads in the scheme area are not entitled to visitor permits.

- 3.118 Event day business permits are available to legitimate businesses in the scheme area. These include passes specifically issued to support Royal Mail and Metropolitan Police operations in the area. For other eligible businesses, the maximum number of event day permits that can be purchased is three.
- 3.119 Event day school permits are available to a capped number of staff (currently 20) at schools in roads in the scheme area.
- 3.120 Up to 20 event day place of worship permits are available to recognised places of worship in roads in the scheme area that are subject to parking controls only on Wembley event days. It is not available to places of worship on roads that are subject to regular CPZ controls on non-event days.
- 3.121 Permits issued to places of worship and schools are not vehicle-specific, and are transferable from one vehicle to another. Permits can only be used in roads within the area number shown on the permit.

Other events

Funerals and Weddings

3.122 The Council will consider any special requests made by residents or funeral directors regarding parking arrangements for funerals or weddings. No charge is made for this service. The Council must be notified in advance in order for arrangements to be made to issue a temporary permit which must then be displayed in the vehicle windscreen.

Annual Festivals and Events

- 3.123 Brent is a highly diverse borough. According to the 2011 Census, the six major religions active in the UK (Christianity, Islam, Hinduism, Buddhism, Judaism, and Sikhism) are all represented in Brent. Annual festivals and celebrations generate a significant amount of visitor traffic, and at times of key festivals, there can be severe localised parking congestion caused by visitors' vehicles. This is particularly an issue in areas of the borough where demand for parking is already very high.
- 3.124 The council will work with any faith group to consider requests for parking concessions on a case by case basis. The principle responsibility for informing the council of a planned festival or event lies with the organisers working on behalf of the place of worship or community organisations.
- 3.125 The council should be informed a minimum of twelve weeks prior to the date of the event, in order to allow time to prepare and agree traffic management plans. Organisers are requested to notify the Councils Highways and Infrastructure service in the first instance.
- 3.126 Both Highways and Parking services will work with organisers to assess the level of impact on traffic and parking congestion the event will have. The aim should be to ensure that plans are put in place to help mitigate any impact on traffic and parking congestion.

- 3.127 The council, as the highway authority, has a duty to manage parking demand effectively. In exceptional circumstances the council may consider making pay & display bays available free of charge on a temporary basis, to meet anticipated high demand and reduce the possible impact on parking availability for residents.
- 3.128 Proposals which include agreed parking bay suspensions or dispensations may incur a charge. Agreed parking locations in specific roads and at times where parking would be permitted will also be considered. Information on public transport services will be provided. A detailed plan of available on- and off-street parking will also be provided.
- 3.129 Where events or festivals are expected to attract over 500 visitors, the council may request organisers to arrange for volunteers to act as stewards on the roads around the place of worship. Their role will be to inform and guide visitors to designated parking locations while the event is taking place. Organisers may also be required to arrange for the agreed parking arrangements to be communicated to visitors by all practical means ahead of the event.

Special occasions, one-off events and street parties

- 3.130 The Council understands that many residents living in the borough may wish to hold non-religious events or celebrate special occasions from time to time, and these may also generate specific parking requirements. These events may be of any size, but some may be large and have wide-ranging impacts. The Council publishes a guide, "Organising Events in Brent", which is available on the Council's website, to assist people who wish to organise an event. The guide covers the very wide range of issues, including licensing and consultation, which may need to be addressed when organising an event.
- 3.131 Any event that will lead to an increase in traffic and parking in a particular area, a larger than average number of people on public transport, or a road closure, is likely to need a Traffic Management Order (TMO). In some cases, an event organiser may wish to close a road for a short period of time. A road that is closed to vehicle access, even for a short period of time, has many implications:
 - the public may need to be informed of any road closures or diversionary routes well before the event dates;
 - buses, taxis and emergency vehicles may be affected and may need to be warned of diversions;
 - parking bays may need to be suspended for the day;
 - business loading zones may be affected.
- 3.132 The Council requires a minimum of six weeks' notice for street parties and a minimum of eight weeks' notice for other events, for approval by the Borough Safety Advisory Group (BSAG) and to carry out the required procedures to close a road.
- 3.133 The Council makes a charge to cover its costs where a Traffic Management Order is required to close a street for an event.

Places of worship and community centres

- 3.134 Places of worship often provide valuable services to local communities, in addition to their principle function serving faith groups. There are over 200 places of worship located within the borough, with many located in residential areas. People often use their cars to travel to worship or to attend related community activities, and this can sometimes cause congestion and/or conflict with the parking needs of local residents and businesses. With the exception of event-day place of worship permits in Wembley (only premises that are not in a CPZ are eligible), no special on-street parking provision is made for places of worship and community centres.
- 3.135 The Council seeks to work with any faith group that wishes to reduce the impact of travel to their premises and encourages the development of a Travel Plan for faith sites. This provides an opportunity to: improve access to the site for staff, members of the congregation and visitors; encourage more sustainable travel options; improve accessibility; reduce congestion and excessive demand for parking spaces; and reduce carbon emissions, pollution and noise.
 - 3.136 A specific Controlled Parking Zone (Zone T) is in place around the Neasden Temple to mitigate the impact on local streets.

Commercial vehicles, deliveries and servicing

- 3.137 To support the local economy and ensure that businesses can continue to receive deliveries and despatch goods, the Council normally allows stopping on yellow lines for the purpose of loading and unloading goods. This arrangement, which is formalised in a Traffic Order, allows up to 20 minutes for this action, so long as a continuous loading or unloading process is taking place. Civil Enforcement Officers allow a twenty-minute observation period to check that a vehicle is parked for loading, and not for any other purpose, before issuing a PCN.
- 3.138 However, uncontrolled loading during peak traffic periods can lead to traffic congestion and endanger pedestrians, and it is therefore often necessary to prohibit loading and unloading at times of high traffic flow. These restrictions are indicated by signs and yellow kerb stripes ('blips').
- 3.139 When considering new traffic or parking schemes, the Council consults with businesses to ensure that the proposals will not have an unduly negative impact on the local economy, and that the access and loading needs of businesses are met without unacceptably compromising traffic management or the other objectives of the scheme.
- 3.140 Formal on-street loading bays can cause enforcement problems because of the difficulty in deciding whether a vehicle is involved in loading/unloading operations or is simply parking. The use of sections of yellow line, which prohibit parking but allow loading and unloading, is often a more flexible and practical way of providing for business needs.
- 3.141 All business proposals for better loading facilities are considered in the context of existing rear-servicing access, the impact on bus services, and the potential for the loss of footway space where the proposal is to "cut in" a loading bay.

Overnight parking of commercial vehicles

- 3.142 In common with most London boroughs, Brent prohibits the overnight parking of commercial vehicles on all borough streets. "Commercial vehicle" includes all goods vehicles whose maximum gross weight exceeds 5 tonnes, but does not include motor vehicles constructed or adapted solely for the carriage of not more than 12 passengers (exclusive of the driver) and their effects, or a hackney carriage (taxi). The parking ban operates from 6.30pm to 8.00am the following morning.
- 3.143 In practice, this means that most buses and coaches (but not minibuses as commonly recognised), and most larger lorries, are banned from parking overnight.

Coach parking

- 3.144 The Council does not currently own or operate any on- or off-street coach parking facilities. However, privately-managed coach parking is provided for event days at Wembley Stadium.
- 3.145 The Council's Local Development Framework preserves Policy TRN30 of the 2004 Unitary Development Plan, which says that developments likely to attract significant coach traffic (e.g. larger hotels and exhibition facilities) should include adequate coach stopping and parking facilities to ensure that unloading and alighting do not obstruct the public highway.
- 3.146 The Wembley Area Action Plan of January 2015 suggested that existing stadium coach parking may be redeveloped, with any new coach parking being located away from the town centre, but within 960 metres of the centre of the Stadium. In 2018, developers commenced work on a purpose-built complex, thought to be Europe's first multi-storey coach parking complex near the East Gate of Wembley Stadium. The development is expected to be completed before the summer of 2020 and represents a major investment in parking for the Stadium and Area, as well as the 85-acre development taking place at Wembley Park.

Lorry Parking

3.147 There are no dedicated lorry parks in Brent.

Footway Parking

- 3.148 Parking on the footway causes an obstruction for pedestrians with wheelchairs and buggies, sometimes forcing them into the carriageway. It can also result in broken paving, which can become a trip hazard and lead to serious injury to elderly pedestrians.
- 3.149 The Greater London Council (General Powers) Act 1974 introduced a ban on parking on the footway, or on footway verges, in all roads in London. This is intended to prevent damage to the footway and to provide clear passage for pedestrians, carers with children in buggies, the visually impaired and wheelchair users. This ban is now decriminalised and subject to civil enforcement in the same way as other parking contraventions.

- 3.150 Within the context of the London-wide ban, boroughs can introduce exemptions to prevent obstruction of the carriageway. These exemptions aim to assist in reducing traffic congestion and improving community safety by reducing obstruction of emergency vehicles in residential areas, while retaining adequate access for pedestrians. There are standard signs and markings which indicate where footway parking is allowed
- 3.151 The Council has adopted a set of criteria which have to be met before a street is granted exemption. These are:
 - 1. Exemption will be granted only where the parking of vehicles wholly within the carriageway reduces the carriageway width to less than 3 metres.
 - 2. A minimum footway width of 1.2 metres for temporary schemes, or 1.5 metres where a permanent Order has been made, must be available for pedestrians.
 - 3. Roads in shopping and other busy pedestrian areas will not be considered.
 - 4. Roads outside schools, play areas, libraries, hospitals, health centres and residential homes for the elderly and other places of public assembly, will not be considered.
 - 5. Any road where, were it to be exempted, vehicles would park on a grass verge will not be considered.
 - 6. No vehicle will be allowed to park where it would obstruct the proper use, by all classes of vehicles, of a turning area provided at the end of a cul-de-sac or similar blocked highway.
 - 7. Motor cycles will be permitted to park on footways where footway parking exemption has been granted.
 - 8. Exemption will not be granted where residents can provide off-street parking but have chosen not to do so, or do not use existing off-street parking places for a variety of reasons not considered acceptable on highway, traffic or amenity grounds.
 - 9. Where a street does not meet the above criteria for exemption, and where any enforcement action would create a situation where access for emergency vehicles is obstructed and/or the capacity of the highway is reduced below its functioning level, special consideration will be given according to the particular circumstances, and the criteria relaxed as necessary.

Emergency vehicles

- 3.152 Fire, Ambulance or Police vehicles are exempt from all parking controls and restrictions while they are being used operationally in the borough. Access for these vehicles can prove difficult, especially at certain times of the day and along particular busy distributor routes
- 3.153 The presence of parked motor vehicles along these routes, and indeed in narrower residential streets, can sometimes delay emergency vehicles. This can have severe consequences. This problem is exacerbated when the driver of an illegally parked motor vehicle which is obstructing an emergency cannot be located guickly.
- 3.154 Unhindered access for emergency vehicles is essential and the Council will rigorously enforce against unauthorised parking on all of the main emergency corridors.

3.155 Emergency vehicle access is always considered when considering new traffic or parking schemes, and in considering applications for new developments.

School "Keep Clear" markings

3.156 The Council installs yellow zig-zag "Keep Clear" markings near schools at sites where parked vehicles are a hazard to children. The markings are a reminder not to stop and park at the school entrance for whatever reason and are enforceable under moving traffic contravention rules. The Deregulation Act 2015, which restricted parking enforcement by CCTV, still allows the Council to use CCTV to enforce these markings.

Access Bars

- 3.157 In areas outside Controlled Parking Zones, residents and businesses sometimes experience difficulty with drivers obstructing vehicular access to their premises. However the introduction of short sections of yellow line may not be practicable, as resources for the enforcement of waiting restrictions are limited.
- 3.158 The Traffic Signs Regulations and General Directions allow the provision of white access bars (carriageway markings to diagram 1026.1) across driveways where there is the potential for obstruction. The markings are to indicate to drivers that there is a vehicle access or crossover present and that they should not park.
- 3.159 Residents and businesses may apply to the Council for a white line marking. Markings cannot be provided where waiting restrictions are in force or where the white line would conflict with other carriageway markings. Accesses which are shared between two or more premises require the consent of all the affected occupiers. The Council makes a charge for this service. However, the charge may be waived for disabled applicants as part of a personal care package.
- 3.160 White line markings are advisory and are intended to act as a deterrent to thoughtless parking. However, enforcement is possible in some circumstances. The London Local Authorities and Transport for London Act 2003 (section 14) allows the Council to issue Penalty Charge Notices to, or remove, vehicles parked across dropped footways. This includes places where the footway is dropped to allow pedestrians to cross the road more easily.
- 3.161 In cases where a dropped footway is there to provide access to a driveway which is for individual residential premises (and not a business or shared with other premises), then enforcement action can only be taken when the occupier of the premises requests the local authority to do so. This means that it is not an offence for a residential occupier to park across his or her own driveway. The Council operates a telephone service between the hours of 8am and 10pm (except Christmas Day) which allows residents to ask for the removal of a vehicle which is blocking their driveway.
- 3.162 Other obstructions of the highway are a matter for Police enforcement and are dealt with under Section 137 of the Highways Act 1980.

Cycle parking

- 3.163 The Council encourages everyone living and working in Brent to cycle, for the benefits it offers to the individual as well as the benefits for the local community through reducing pollution, congestion and emissions. The provision of convenient, clean, well-lit and secure cycle parking can play a major role in an individual's decision to cycle on a particular journey.
- 3.164 Cycle parking facilities can be found throughout the borough in convenient locations near shops, workplaces and railway and underground stations, and the Council continues to identify new locations for the provision of cycle parking.
- 3.165 There is also a requirement to provide cycle parking in most new developments, including housing developments. The standards are set out in the Council's Local Development Framework (LDF), and compliance with these standards is checked as part of the planning application process.
- 3.166 Cycle parking is administered by the Council's Highways and Infrastructure service.

Off-street Parking (Car Parks)

- 3.167 Public car parks in the Borough are operated both by the Council and by private operators. Car parks are the only way of providing substantial numbers of parking spaces in areas of high demand. They generally offer the opportunity to park for longer than nearby on-street space and often offer a cheaper tariff and visible security measures.
- 3.168 An annual car park season ticket is available for some of the car parks operated by the Council. A season ticket will allow you to park your vehicle in a specific car park within the borough Monday to Sunday. Season tickets are available to purchase for three, six or twelve months through the parking account.
- 3.169 Currently season tickets are available at Northwick Park, close to Northwick Park Hospital and Tube Station, Preston Road, by Preston Road Tube Station and Disraeli Road, in the Lower Place Industrial estate.
- 3.170 During major events at Wembley Stadium, for visitors who wish to drive and park their vehicle, the council has introduced pre-booked parking sessions in Lonsdale Road and Preston Road car parks. These car parks offer safe, secure parking and are within a short walk of Wembley Stadium. Tickets can be booked via Wembley Park website in advance of the event, providing an easy and convenient option.
- 3.171 A summary of the Council's off-street parking supply is given in Appendix 4. The total Council off-street parking stock in the Borough is 614 spaces (including motorcycle spaces), allocated as follows:

Car spaces	554	Parent & child spaces	4
Disabled spaces	14	Electric vehicle	
Business spaces	26	spaces*	6
Motorcycle (P2W) spaces	10	·	
Total spaces	614		

(* 47 electric vehicle spaces are also available as general parking)

There are also over 1,900 spaces in privately run car parks available to the public.

3.172 In addition to the above, there are large numbers of spaces associated with shopping centres, supermarkets etc., although these are normally intended for customers only.

Parking on Driveways

- 3.173 The concentration of event venues in Wembley means that a market has developed in which private householders, who are entitled to on-street permits, make their private driveways available for rent on a daily basis. In terms of town planning, this is legal for up to 28 days a year. Any more permanent commercial use of a residential driveway would require the granting of planning consent.
- 3.174 There are additional parking controls on event days in the Wembley Stadium Event Day Parking Zone that are designed to reduce parking stress and protect the normal activities of residents and businesses on event days. The renting out of private residential space adds to parking stress by displacing residents' vehicles on to the street, while long-stay event visitors, who would normally not be able to park, occupy the off-street space.

Parking on housing estates

- 3.175 Brent's council-owned housing estates are managed by the Brent Housing Management service, which has responsibility for providing, managing and controlling parking on the estates' unadopted streets, and for providing and managing secure cycle parking for residents. While roads on housing estates may sometimes appear similar to the surrounding public highway, they are in fact private roads. A separate permit system operates on estate roads. Permits issued by the Council's Parking service for use in nearby Controlled Parking Zones are not valid on Brent housing estates.
- 3.176 Blue Badge holders are not automatically entitled to park on estate roads, and where disabled parking is available, additional conditions may apply.
- 3.177 Brent Housing residents are able to apply for up to two resident permits and one visitor permit, subject to providing proof of residence and confirmation that residents' vehicles are registered at the applicant's address. Permits last for one year.
- 3.178 Residents of housing estates may also apply for a normal on-street parking permit in the relevant zone, but only if their address is on an adopted road

Procedure for introducing on-street parking schemes

3.179 The Council will consider the introduction of new CPZs or other on-street parking controls where:

- there is public support and there is evidence of a need for management of the demand for parking; or
- parking is compromising road safety.

Controls have been introduced in order to regulate traffic volumes and parking demand in order to support the transport and environment objectives of the LDF and the Long Term Transport Strategy.

- 3.180 The programming of new parking projects is subject to prioritisation, alongside other transport projects within existing budgets. Funding for new parking controls may also be available when the transport assessment for a new development indicates the need for additional controls, and the funding for the work is secured under a planning agreement related to the development.
- 3.181 As required by the Road Traffic Regulation Act 1984, all restrictions on kerbside parking must be introduced by making a permanent or experimental Traffic Management Order. As part of the order-making process, local authorities are required to carry out statutory consultation with defined stakeholders. These include:
 - the emergency services;
 - adjoining authorities, if affected;
 - representatives of freight transport operators; and
 - other known stakeholders who would be materially affected by measures.
- 3.182 In advance of the statutory order-making consultation, the Council will normally undertake informal consultation with residents, frontagers and elected ward Members. In some cases it may be appropriate to consult over a wider area before moving on to the statutory phase. Depending on the circumstances, and the scale of the proposal, consultees can also include Transport for London and local transport interest groups, such as Brent London Cycle Campaign.
- 3.183 The Council now seeks to make its consultations available on-line and through social networking sites. This allows a greater flexibility in reaching and responding to consultees and potentially opens access to decision-making to a broader spectrum of the population. Through this process, stakeholders in the community can play a part in developing schemes that provide solutions which address specific local issues.
- 3.184 Following the consultation process, the Council decides on the measures to be introduced following consideration of any comments or objections received. New schemes and changes to existing waiting and loading restrictions are generally made using permanent Traffic Management Orders.

4. Parking Spaces and New Development

- 4.1 As explained in Section 2 above, the Local Development Framework (LDF) is the Council's main planning policy document or, more correctly, series of documents. The provision of parking space in new developments is governed by local policies contained in the LDF, which in turn must comply with national planning policy and the London Plan. These policies cover not just the number of car parking spaces required, but also disabled parking, cycle parking, the provision of electric vehicle charging points, deliveries and servicing.
- 4.2 In November 2016 the Council published the **Development Management Policies** (DMP) document. This document sets out the Council's policies which along with other policies within the National Planning Policy Framework, London Plan, Brent Local Plan and Neighbourhood Plans will be used for the determination of planning applications for development in the borough.
- 4.3 In general terms, the Council's parking standards and managing the availability of car parking for new developments are contained in DMP section 12 and in Appendix 1 Parking Standards.
 - Where parking is proposed, standards applied are based on whether the development is in inner or outer Brent with exceptions for regeneration and growth areas which would be subject to transport assessment verification; and
 - Take account of public transport accessibility in the vicinity of the site, with a
 distinction made between areas of the borough to the north and the south of the
 Dudding Hill railway line as this broadly reflects variations in public transport
 provision.

Car-free development

- 4.4 The Council's planning policies generally require that residential developments should include some parking provision for residents. The number of parking spaces required can vary depending on the location of the development, the degree of public transport accessibility and the type of tenure.
- 4.5 Brent has characteristics associated with both Inner and Outer London. Brent's standards do not significantly deviate from those in the London Plan. Managing the impact of parking covers the role of car free development.
- 4.6 The amount of parking provided in accordance with parking standards is a balance between a number of factors. These include seeking to reduce unnecessary car trips, promoting effective use of land, make development viable and not creating on street parking pressure which undermines the quality of life. The standards promote fewer spaces in locations better served by alternative transport.
- 4.7 The emphasis is on not trying to provide spaces where they are unnecessary. Opportunities for car free development might include locations close to public transport interchanges where space for parking is constrained. Other areas within Controlled Parking Zones that are easily accessible by public transport may also be suitable for car free development.

- 4.8 Exceptionally, "car-free" housing developments may be permitted in areas with good or very good public transport accessibility. In Wembley, the Wembley Area Action Plan of January 2015 states Policy WEM 15 that the Council will promote the implementation of car-free development where it can be associated with good public transport accessibility.
- 4.9 An essential aspect of car-free developments is that occupation is restricted by condition to those who have agreed not to be car owners (other than for pooled communal vehicles). These residents will not be granted residents' parking permits or event day residents' parking permits.
- 4.10 Consequently it is only possible to consider car-free development in areas where onstreet parking is already restricted.

Transport assessments and travel plans

- 4.11 Larger developments may be required to submit a transport assessment as part of the planning application process. Transport assessments identify the amount of travel likely to be generated by a development, how people are likely to travel, and any impact the development may have on the road or public transport networks. A transport assessment can also identify the amount of car and cycle parking needed by a development, and any delivery or servicing needs.
- 4.12 One outcome from a transport assessment may be the development of a travel plan for the site. A travel plan will build on the transport assessment to identify ways of encouraging sustainable travel during the life of the development. A key element of a travel plan is that it is regularly monitored and updated, and there is continuing engagement with staff and other users of the site. Examples of travel plan initiatives can include the provision of secure and dry cycle parking, loans for season tickets or the purchase of bicycles, the use of pool cars or car club vehicles for business journeys, and the provision of information on bus routes and timetables.

5. Parking Charges

Parking pricing principles

- 5.1 The Council has progressively developed a parking and CPZ permit charge structure that reflects balanced transport policies and its overarching environmental aims and objectives.
- 5.2 Parking charges are reviewed regularly to ensure that:
 - they are consistent with charges made in other boroughs;
 - they meet the environmental principles that help improve air quality; and
 - local businesses are not unduly affected by high levels of charges in terms of loss of trade to other shopping areas.
- 5.3 The Council has adopted a set of principles in order to guide the pricing of parking. These principles are:

No change should be made that undermines the Council's policy objectives, and subject to this overriding principle:

- A preference for annual inflation-matching price changes, rather than longer periods of static pricing followed by substantial price change, unless the cost of implementing annual inflation is economically unviable;
- Where different means of applying or paying for services result in significantly different costs for the Council, customer prices should reflect the different costs;
- The general consumer assumption that larger or longer purchases should result in a lower unit cost should apply where practicable;
- Inconsistent pricing for comparable products should be avoided;
- Very large anomalies should be eliminated in a staged manner;
- The cost of management and enforcement should, where possible, be fully met
 by the income from parking charges and permits, with the surplus on receipts
 from contravention penalties being used to help ensure that the costs of
 concessionary travel on public transport can be met.
- 5.4 Whilst it is reasonable for a Council to take due regard of estimated costs and income arising from the management of parking, is not lawful for a Council to use the Road Traffic Regulation Act 1984 to impose charges to raise revenue.
- 5.5 The Council has agreed that a range of permits, available for different durations, should be priced according to fixed multiples as follows:
 - 24 month permit 195%
 - 12 month permit 100%
 - 6 month permit 60%
 - 3 month permit 40%
 - 1 month permit 20%
- 5.6 Residents' permit prices are automatically adjusted on the 1st working day of April each year, based on the most recent available Retail Price Index (RPI) data

- published by the Office for National Statistics, and rounded to the nearest pound. This will typically be the January RPI figure, which is published around the 20th of February each year.
- 5.7 Since its introduction in 2013, the Council continues to offer a dedicated tariff for users of the cashless parking service, for both on-street and off-street pay and display parking. In recognition of the fact that the operating costs of a cashless service are markedly lower than cash payments at pay and display meters, parking via the cashless provider is fifty pence cheaper than making a cash payment.

Penalty Charge Bands

- 5.8 Penalty Charges are set on a London-wide basis, and are applied according to location and the nature of the contravention. In general terms, a penalty will be in the "lower" or "less serious" category if it relates to a place where parking is normally allowed, and in the "higher" or "more serious" category if it relates to a place where parking is prohibited.
- 5.9 The penalty charges which currently apply in Brent are set out below. However, it should be noted that they are subject to change. In particular, the division of the borough into Bands A and B will be specifically reviewed during 2020/21.

	More serious contraventions	Less serious contraventions
Band A 1. All roads in the Wembley Event Day Protective Parking Scheme Area (at all times and not only on Wembley Event Days). 2. Harrow Road between Greyhound	£130	£80
Road and Kilburn Lane.		
Band B All remaining streets in the London Borough of Brent.	£110	£60
Car Parks – all zones	£110	£60

There is a discount of 50% if a Penalty Charge Notice issued by a CEO is paid within 14 days. The period is 21 days if the notice is issued by CCTV.

5.10 Charges for other contraventions and parking services are also set on a London-wide basis. These include the following:

Contravention	Penalty charge
Bus lane contravention	£130
Minor moving traffic contravention	£130
Release from car pound	£200
Vehicle storage charge	£40 per day

Disposal fee	£70
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Carbon Emissions-based charging

5.11 As stated in the "Residents' Permits" section above, the Council uses vehicle carbon emissions as the basis for setting its charges for residents' parking permits.

Permit refunds

- 5.12 Permit holders who no longer require a permit, for example those who have moved out of the borough or have disposed of their vehicle, are eligible for a partial refund of their permit fee. The arrangements for refunds are set out in the Council's Traffic Management Orders, and are as follows:
 - 24 month permits maximum 8 months' refund;
 - 12 month permits maximum 4 months' refund;
 - 6 month permits maximum 2 months' refund;
 - 3 month permits maximum 1 month's refund.

Only full months remaining are eligible for a refund.

Dispensations and suspensions

- 5.13 Dispensations temporarily allow a vehicle to park in a location where parking is not generally permitted (for example, on yellow lines or in a reserved bay) where no alternative parking is reasonably available. This often happens when building works are required to take place at a property and there is no practical alternative parking available. The maximum dispensation is for four hours in every 24-hour period. Any issued permit must be displayed on the windscreen of the authorised vehicle.
- 5.14 Suspensions allow existing parking spaces to be suspended where traffic flow would be compromised during road works, or to accommodate traffic attending special events. Suspensions are also used to facilitate building works, filming, removals, funerals and so on. In these cases the temporary suspension of a parking bay reserves a specific bay or bays for use on a specified day, or part of a specified day, by a specified vehicle. If a suspension is granted, the Council will post notices informing other motorists of the change. Any issued permit must be displayed on the windscreen of the authorised vehicle.
- 5.15 Vehicles which park in a suspended bay once a suspension notice is displayed are liable to be removed for parking in contravention. Any other items left in a suspended bay are liable to be removed. Because of the need to inform motorists of a forthcoming suspension, an application must normally be made 14 working days in advance. Urgent suspensions with short notice will normally attract an additional fee.
- 5.16 Applications for dispensations and suspensions can be made by email or post, using a form available on the Council's website. A fee is chargeable for this service. The Council does not guarantee that it will grant an application for a dispensation or suspension. Suspensions for Brent Council funded street maintenance is at no cost.

5.17 A suspension does not affect the designation and legal status of a parking place. It merely removes the parking place (or part of it), from use during the period of the suspension. Any suspension approved and carried out by, or on behalf of the Council, is without prejudice to any action which may be taken by the Metropolitan Police to suspend parking places without prior warning for reasons including security and public safety.

6. Parking Enforcement

- 6.1 The parking controls agreed by the Council need to be enforced to ensure that residents, visitors and businesses get the benefits that are intended. The Council recognises that a practical, common sense approach is needed to carry out its parking enforcement responsibilities, and it aims to get the balance right ensuring there is neither too much enforcement nor too little. Information provided by members of the public helps to achieve this.
- 6.2 Unfortunately breaches of parking restrictions, due to lack of knowledge or deliberate abuse of the rules by drivers, continue to occur. Contraventions of parking restrictions can lead to traffic congestion, reduced availability of parking for other road users, and have adverse implications for road safety. While many people consider that a breach of the rules is of minor importance, they do not always appreciate the cumulative effect of illegal parking on road safety, congestion, traffic flow and the needs of other highway users.
- 6.3 To ensure that the rules are observed, the Council deploys Civil Enforcement Officers (CEOs) to identify and take enforcement action against vehicles not abiding by local parking regulations. CEOs patrol the whole of Brent, but their deployment is focused on priority locations, including Controlled Parking Zones (CPZs).
- 6.4 Parking contraventions are normally dealt with by the issue of a Penalty Charge Notice (PCN) and, in appropriate circumstances, by removal (towing away) of the vehicle. In certain circumstances, warning notices may be issued instead of PCNs. The offences for which PCNs can be issued are detailed in the list of offence codes issued by London Councils, as set out in Appendix 6.
- 6.5 As well as managing Controlled Parking Zones and local parking schemes, the Council also provides important enforcement of other parking restrictions to bring about motorist compliance. The list below is not exhaustive, but the work undertaken by the service includes enforcement of:
 - School "Keep Clear" markings
 - Yellow lines
 - Footway parking
 - Bus lanes
 - Yellow box junctions
 - Other moving traffic offences
- 6.6 In Brent, Serco manages the provision of parking services. Serco was appointed as the council's parking management and enforcement contractor in July 2013 for a period of five years with an option to extend. The Council subsequently agreed to award Serco a contract extension from July 2018 until March 2023.

Civil Enforcement Officers (CEOs)

6.7 The Council's Civil Enforcement Officers are employed by Serco under the parking enforcement contract. All CEOs are fully trained before they start their enforcement duties and are required to follow guidance set by London Councils, the organisation

- that represents the common interests of the 32 London boroughs and the City of London.
- 6.8 CEOs wear a uniform that is easily recognisable and each officer is required to display an individual ID number. CEOs are not paid commission and they are not set individual targets set for the number of Penalty Charge Notices (PCNs) they issue. A CEO who identifies a contravention is expected to issue a PCN. CEOs use a handheld device to assist in issuing PCNs, and are required to keep a log and record photographs of contraventions for evidence purposes.
- 6.9 Following the implementation of a new parking scheme, CEOs will issue Warning Notices rather than PCNs for two weeks. Warning notices are also issued for up to seven days following the expiry of a resident's permit.
- 6.10 CEOs have a difficult role to perform and can experience conflict with some members of the public. All CEOs are issued with body-worn video cameras. Assaults on CEOs are treated very seriously and will be investigated. The Council will press for Police action in the case of any assault. Any allegations of dishonesty or impropriety on the part of CEOs are also fully investigated.

Penalty Charge Notices

6.11 A Penalty Charge Notice (PCN) may be issued at the scene by being fixed to the vehicle windscreen, or handed to the person appearing to be in charge of it, or issued by post in the following cases: enforcement is by camera; or the CEO was prevented by someone from serving it at the scene; or the CEO had begun to prepare a PCN but the vehicle was driven away before it was finished and issued.

There is a 50 per cent discount if payment is received within 14 days from the date the PCN was issued.

Observation periods and grace periods

- 6.12 In some cases, for example when a vehicle is left unattended on a yellow line where loading is prohibited, it is possible for a CEO to issue a PCN immediately. In other cases, a CEO will not issue a PCN to a vehicle until he or she has observed the vehicle for a minimum of three minutes. This **observation period** is used to ensure that, for example, the vehicle has not stopped simply to pick up a passenger from the kerbside, or is not legitimately loading or unloading.
- 6.13 CEOs also allow a ten minute grace period in specific circumstances, before a PCN is issued. The grace period is the minimum waiting time which must be allowed to elapse between a vehicle being first observed as parked in contravention, and a CEO then issuing a PCN. The observation period may commence within the grace period.
- 6.14 Examples of when a grace period will apply include:
 - a vehicle parked in a residents' bay (or other controlled bay) at the start of controlled hours;
 - a vehicle parked in a paid bay whose paid-for period has expired; and

- a vehicle displaying a Blue Badge that is parked on a Blue Badge bay for longer than any stipulated time period.
- 6.15 Examples of when a grace period will not apply include:
 - a vehicle parked on a permit bay, shared use bay or pay and display bay when controls are already in force, and the driver does not display a permit or pay and display ticket. In other words, the grace period does not allow ten minutes' free parking where the driver would otherwise have to pay;
 - a vehicle parked outside the hours of control on a single yellow line (and not in a designated parking place) when controls commence;
 - a vehicle parked in a bay that is not designated for that class of vehicle if it parks when controls are already in force;
 - a vehicle parked on a yellow line displaying a Blue Badge if parked for longer than the maximum 3 hour period.

Challenging a PCN

- 6.16 The Council aims to provide a firm, fair, transparent and customer-focused enforcement service. If a motorist disputes the issue of a PCN he or she has received, they can challenge the PCN informally. Should the motorist be dissatisfied with the Council's response at this stage, they can make a statutory Representation in writing that the Council must, by law, consider. There are eight statutory grounds for making a statutory Representation, but in practice the Council will consider every Representation even if it does not fall within the prescribed grounds.
- 6.17 If a Representation is rejected, and the motorist is not satisfied with the decision, a written appeal may be made to the Environment and Traffic Adjudicators (ETA, which fulfils the Parking Adjudicator role in Greater London). The appellant may request a personal hearing.
- 6.18 The Council has a duty to comply with any direction issued by the Adjudicator.

CCTV enforcement – parking

- 6.19 The Council continues to use CCTV enforcement for a number of purposes. Operational guidance introduced by Central Government under the terms of the Deregulation Act 2015 has restricted the use of CCTV for enforcing parking (as opposed to moving traffic) offences. These changes mean that in most circumstances a parking PCN may only be issued by fixing it to the offending vehicle or handing it to the person who appears to be in charge of the vehicle.
- 6.20 Since CCTV parking enforcement relies on serving the PCN by post, it may no longer be used except in specified circumstances. These are:
 - if the CEO has been prevented (for example by force, threats of force, obstruction or violence) from serving the PCN;
 - if the CEO had started to issue the PCN but did not have enough time to finish or serve it before the vehicle was driven away, and the CEO would otherwise have to write off or cancel the PCN;

- where the contravention has been detected on the basis of evidence from an "approved device".
- 6.21 An "approved device" is a camera and associated recording equipment which has been approved by the Secretary of State for Transport. PCNs for parking contraventions may not be served by post on the basis of evidence from an approved device other than when vehicles are parked on:
 - a bus lane;
 - a bus stop clearway or bus stand clearway;
 - a Keep Clear zig-zag area outside schools; or
 - a red route.
 - Parking and loading restrictions within mandatory cycle lanes
- 6.22 Certain contraventions (such as double parking, footway parking and parking in areas where stopping is prohibited) are difficult to enforce by CEOs on foot, because the driver often remains close to the car and can move the vehicle if a CEO is seen approaching.

CCTV enforcement - moving traffic contraventions

- 6.23 In order to support the Council's policy of encouraging sustainable form of transport, the Parking service provides stringent enforcement of bus lanes in order to secure faster journey times for bus users.
- 6.24 In addition, the Council has adopted powers available under the the Traffic Management Act 2004 to undertake civil enforcement of a number of moving traffic offences. Yellow Box Junctions, prohibited turns, and no-entry signs are all examples of moving traffic violations actively enforced by the service. Such restrictions are in place to ease congestion on the borough's roads, and improve road safety.
- 6.25 CCTV enforcement is co-ordinated from the enforcement suite in Brent Civic Centre.

Mobile CCTV

6.26 The Council has retained the use of mobile CCTV to enforce school Keep Clear markings. During the rest of the day the vehicles are used for enforcement at bus stops and for intelligence gathering.

Vehicle removals and clamping

6.27 The Council provides a vehicle removal service. In practice, removal is focused on more serious offences, such as obstructive parking which affects road safety or creates traffic congestion. A vehicle is eligible for removal if it remains in a pay and display or shared use bay for more than 30 minutes after a PCN has been issued. If a vehicle is involved in persistent contraventions, and has three or more PCNs outstanding, the removal period may be reduced to 15 minutes. In the case of other types of parking offence (such as obstructive parking on a yellow line), the vehicle may be removed immediately.

- 6.28 All vehicles that have been removed are taken to the Brent Car Pound, which is located at Unit 20-22, Whitby Avenue, Park Royal, NW10 7SF. The pound is open every day, except Christmas Day, between 8am and 8pm.
- 6.29 The Council does not operate a clamping service. Enforcement Agents ('bailiffs') operating in the borough may use clamps.

Abandoned and unwanted vehicles

- 6.30 The Council will remove abandoned or unwanted vehicles. The requirement for a vehicle to display a tax disc was removed in 2014. It is now possible for a member of the public to check whether a vehicle is taxed or insured by entering the vehicle's registration number and model on the DVLA website.
- 6.31 Possible abandoned vehicles can be reported to the Council by telephone or online, giving the location, registration number, colour, make and model of the vehicle. Abandoned vehicles are removed to the Council's car pound in the first instance.
- 6.32 The Council will also remove unwanted vehicles. This service is free of charge to Brent residents having a vehicle collected from their home address, subject to proof of ownership. Removals requested by non-residents of Brent or by the managing agent of a property in Brent are subject to a charge for each vehicle removed from private property. A managing agent will also have to indemnify the Council against the consequences of removing a vehicle.

Enforcement Outcomes

6.33 Details on the number of PCNs issued by CEOs, Bus Lane contraventions, Parking contraventions and vehicles removed are published in the Council's Parking Annual Reports, available to view or download from the Councils website. The Annual Report is published by 01st October each year.

7. Parking Management

- 7.1 In addition to the enforcement services described in Chapter 6 of this document, the Council's Parking service also provides a number of administrative functions to ensure the smooth running of the service. These functions include:
 - a telephone service to help customers to register for a parking account, to buy permits and other services, and advising customers on parking enforcement activities. This service is currently operated by Serco on the Council's behalf, and is available between 9am and 5pm, Monday to Friday;
 - consulting residents, businesses and elected members on proposed changes to the service and on proposed new parking schemes;
 - handling requests for parking/traffic enforcement when residents or businesses report problems; and
 - monitoring the activities of our contractors to ensure an efficient service and value for money.

Online Parking Accounts

- 7.2 The Council administers permits using an online parking permit system. The online service successfully processes an average of 35,000 customer transactions per month. These transactions are spread over 20 different products, although the most popular of these continue to be Resident Parking Permits and Visitor Parking bookings.
- 7.3 Applicants can apply for a Parking Account online by:
 - entering personal details including name and date of birth;
 - · selecting their address from the database; and
 - providing vehicle registration details if applicable.

It is also possible to provide these details by telephone.

- 7.4 Applicants will not normally need to attach supporting documents, as the system automatically attempts to verify the applicant's car registration details, their address; and that they live in a Controlled Parking Zone.
- 7.5 If the system cannot verify an applicant's details, they will be given a temporary account. The services available are limited to purchasing a permit valid for one month and purchasing up to 30 electronic visitor vouchers. This temporary period allows time for the applicant either to scan and email one of a small list of acceptable documentary proofs of address, or to copy the proof and submit it by post. If the application is subsequently validated, the applicant will be notified, and will then be able to purchase permits up to 12 months' duration, and also to purchase additional electronic visitor vouchers.

Fraud

7.6 Parking - particularly convenient parking - can be a scarce and sometimes expensive resource, and the availability of free or relatively low-cost parking through residents' permits, visitor permits and disabled badges can sometimes

- be misused. Misuse of parking permits can constitute fraud and it can also be a criminal act.
- 7.7 In particular, Blue Badge fraud and misuse is a significant problem in Brent, in London, and across the rest of the UK. People who have a genuine disability and a real need for a Blue Badge are often unable to park as the spaces are taken by ablebodied people fraudulently misusing a Blue Badge to park free or on a yellow line.
- 7.8 Fraud and misuse of Blue Badges comes in a number of forms:
 - Fraud: when someone is using a counterfeit Blue Badge, a stolen Blue Badge, an altered Blue Badge, or a deceased person's Blue Badge;
 - Misuse: when a genuine Blue Badge holder's Badge is used by another person and the Blue Badge holder is not in the car.
- 7.9 A national Blue Badge database was created in 2012 which helps prevent multiple and fraudulent applications and makes it easier for people checking badges on the street to verify a badge's validity.
- 7.10 The Council organises regular operations targeting Blue Badge fraud and misuse. These operations involve members of the Council's Parking and Audit & Investigation teams, and the Police, in targeting particular areas. Considerable successes have been achieved, involving the issue of PCNs, the towing away of vehicles and the confiscation of Blue Badges. The Council intends to enhance these activities by devoting targeted resources to the detection and prevention of fraud and misuse.
- 7.11 If misuse is identified, a PCN can be issued, possibly supplemented by the vehicle being towed away. If the circumstances allow the Police to seize the misused Blue Badge, it can be returned to the genuine Badge holder with a warning, but no penalty. However, the Council has wide powers to prosecute both the person misusing the Blue Badge and a person who deliberately allows their Blue Badge to be misused. As part of its enhanced anti-fraud activities the Council will actively consider prosecuting the perpetrator in all cases of misuse.
- 7.12 The Council will always consider bringing a criminal prosecution in cases which appear to involve fraud, and where sufficient evidence is available following an investigation.
- 7.13 The Council can withdraw a Blue Badge after a relevant conviction, or if there is evidence that it has been fraudulently obtained. Where the offence prosecuted was committed by a third party using the holder's badge, the authority needs to demonstrate that the holder knew the third party was using the badge, before it can be withdrawn. The Council has put in place a procedure to ensure that a vulnerable badge holder is neither prosecuted nor has a badge withdrawn as a result of being coerced or manipulated by a third party.

Travel initiatives

7.14 This Parking Policy is one element of the Council's traffic and transportation policies, which together have shared strategic aims such as reducing the need to travel by private car, whilst supporting initiatives to increase social inclusion and economic

activity in the borough. Thus projects which improve bus reliability, make it easier to choose to walk or cycle, or which improve accessibility to stations, and the introduction of car clubs and car-free developments, all have a role in reducing car use and car ownership. In turn this will help to slow down the spread of parking stress on the borough's streets.

- 7.15 Another initiative to encourage sustainable travel is the use of travel plans. Travel plans identify the current travel patterns at workplaces or other institutions like schools and colleges, and try to find ways of encouraging staff and other users to choose non-car modes of travel. (See also the section above on parking in new developments).
- 7.16 Brent is one of six West London boroughs which make up the WestTrans partnership (the others being Ealing, Hammersmith & Fulham, Harrow, Hillingdon and Hounslow). WestTrans works to identify, develop and implement transport projects to the benefit of the sub region. It also contributes relating to the development of an appropriate transport strategy for West London and provides a platform to lobby regional and national government in a cohesive manner. WestTrans is able to offer organisations advice on developing their own travel plan.

Financial arrangements

- 7.17 As stated in the chapter on Parking Charges, while a council may take due regard of estimated costs and income arising from the management of parking, it is not lawful for a council to impose on-street parking charges merely to raise revenue.
- 7.18 Local authorities in London are required to keep a separate account of their income and expenditure in respect of designated (i.e. on-street) parking places, and their functions as enforcement authorities. They must send a copy of this account to the Mayor of London. In addition, the Local Government Transparency Code requires authorities to publish on their website:
 - A breakdown of income and expenditure on the authority's parking account. The breakdown of income must include details of revenue collected from on-street parking, off-street parking and Penalty Charge Notices.
 - A breakdown of how the authority has spent any surplus on its parking account.
- 7.19 Furthermore, local authorities are prohibited from spending any surpluses in their parking accounts on anything other than the management of parking or other specified transport related expenditure (this specified expenditure is more widely defined as it applies to authorities in London). Local authorities may not use the surpluses to subsidise other non-related council services.
- 7.20 The Council currently uses its parking surplus solely to meet part of the costs of the London Freedom Pass. Further details can be found in the Council's Annual Parking Report.

Monitoring Performance

7.21 The Council maintains records of the Parking service's performance covering a range of indicators, including permit sales, on-street and off-street income, and income from

enforcement. These indicators are published in the **Parking Annual Report**, which is available on the Council's website. The items included in monitoring are as follows:

- Total permit and visitor revenue
- Visitor parking use
- On-street pay and display sales
- On-street cashless sales
- Off-street pay and display sales
- Off-street cashless sales
- On-street CEO revenue
- Off-street CEO revenue
- On-street CCTV revenue
- On-street bus lane revenue
- On-street moving traffic revenue
- Enforcement volumes
- Vehicle removals
- Telephone-based services
- Representations and appeals

Retention Periods

The Council holds financial records for a period of six years.

8. Future Challenges

- 8.1 The challenges that the Council's Parking service will have to face in future years come both from within the borough and from outside it. Among the known factors which will contribute to the challenge are:
 - the Climate Emergency
 - any change in the number of cars owned and used by residents
 - the continued expansion of Wembley Town Centre
 - ensuring that parking from new developments does not worsen on-street parking conditions.
 - Extension of the Ultra Low Emissions Zone (ULEZ).
 - Developing the infrastructure needed to meet growth in electric vehicle ownership
 - Improving air quality
 - The impact of the Covid-19 health emergency

Regional and sub-regional transport policies and initiatives will also have a bearing on future levels of demand for CPZs, for example the extension of the Ultra-Low Emission Zone (ULEZ) from 25 October 2021 to the North Circular Road, as well as changes to bus and rail services. The scheme will operate 24 hours a day, every day of the year and there will be a daily charge for vehicles travelling into the ULEZ if they do not meet emissions standards. The scheme will be enforced by TfL through CCTV cameras and Automatic Number Plate Recognition (ANPR) technology.

- 8.2 All these issues will, to a greater or lesser degree, have an impact extending beyond the borough's boundaries. The Council expects to work with neighbouring boroughs, with TfL and with London Councils, to develop common approaches to these challenges which nevertheless retain the flexibility to accommodate local priorities.
- 8.3 Improved and more secure public transport, measures to encourage walking and cycling, travel awareness campaigns, and better travel information will all have a role to play in managing increased demand for parking. Nevertheless, the expected changes mean that the direct demand for both on-street and off-street parking in the Borough is likely to increase.
- 8.4 The general underlying increase in demand will be reinforced by additional pressures at particular localities. Careful management will be required to ensure that new parking provision and new controls create an optimum balance which is closely aligned with the Council's economic, social, planning and transportation priorities. It is often the detailed way in which parking policies are applied at the very local, street-by-street, level which requires the most careful consideration and generates most debate.
- 8.5 Against the current background of public spending restraint, there is competition for allocation of the Council's scarce resources, and this will remain the case for the foreseeable future. The Parking service will face the challenge of delivering

- value for money while maintaining and developing the service so that it remains, and is seen to be, fair, efficient, effective and responsive to change.
- 8.6 In the context of these challenges, it will be important that this Policy remains a living document, which adapts to emerging issues and provides a flexible approach within the context of the Council's overall transport policies and objectives.

Appendix 1 - Controlled Parking Zones in Brent

Zone	Location	Hours of Operation
С	Wembley Central	8am – 6.30pm Monday to Saturday
		excluding Bank Holidays
Е	Ealing Road	8am – 9pm every day
		including Bank Holidays
G	Willesden	8am – 6.30pm Monday to Saturday excluding Bank Holidays
		10am – 3pm Monday to Saturday
GA	Anson Road	excluding Bank Holidays
0.0	6 11 120	8.30am – 6.30pm Monday to Friday
GB	Dudden Hill	excluding Bank Holidays
GC	Dollis Hill Station	8.30am to 6.30pm Monday to Friday
GC	Dollis Hill Station	excluding Bank Holidays
GD	Denzil Road	8.30am to 6.30pm Monday to Friday
00	Benzii Redd	excluding Bank Holidays
GH	Pound Lane	8.30am to 6.30pm Monday to Friday
		excluding Bank Holidays
GM	Cricklewood	10am – 9pm Monday to Saturday
		excluding Bank Holidays 8.30am – 6.30pm Monday to Friday
GS	Donnington Road	excluding Bank Holidays
		8am – 6.30pm Monday to Saturday
Н	Harlesden	excluding Bank Holidays
	0 0 1	8am to 6.30pm Monday to Saturday
HS	Craven Park	excluding Bank Holidays
HW	Wrottoolov Bood	8am to 6.30pm Monday to Saturday
ПVV	Wrottesley Road	excluding Bank Holidays
HY	Cobbold Road	8.30am to 6.30pm Monday to Friday
	Cobbola Roda	excluding Bank Holidays
K	Kilburn	8.30am – 6.30pm Monday to Friday
		excluding Bank Holidays
KB	Brondesbury	8.30am – 6.30pm Monday to Friday excluding Bank Holidays
		8.30am – 6.30pm Monday to Friday
KC	Canterbury Terrace	excluding Bank Holidays
1.75		8.30am – 6.30pm Monday to Friday
KD	Dyne Road	including Bank Holidays
KG	Kilburn Lane	8.30am – 6.30pm Monday to Friday
S	Klibum Lane	including Bank Holidays
KH	All Souls Avenue	12 noon – 3pm Monday to Friday
1311	7 til Godio 7 tvorido	excluding Bank Holidays
KL	Kensal Rise	8.30am to 6.30pm Monday to Friday
		excluding Bank Holidays
KM	Malvern Road	8am – 6.30pm Monday to Saturday
		including Bank Holidays 8.30am – 6.30pm Monday to Friday
KQ	Queens Park	excluding Bank Holidays
11.04	Saccio i ain	but including August Bank Holiday
	.,	8.30am – 6.30pm Monday to Friday
KR	Kensal Green	including Bank Holidays
	Victor Rd & Napier Rd only	8.30am – 9 pm Monday to Sunday
KS		8am – 6.30pm Monday to Friday
NO.	Brondesbury Park	excluding Bank Holidays

Zone	Location	Hours of Operation			
Kinash	ury Road	8am – 6.30pm Monday to Saturday			
Tallgoo		excluding Bank Holidays			
MA	Mapesbury Road	10am – 3pm Monday to Friday			
1717 (Wapesbury Road	excluding Bank Holidays			
МС	Anson Road	10am – 9pm Monday to Saturday			
IVIO	7 (1301) TOdd	excluding Bank Holidays			
MK	Christchurch Avenue	10am – 3pm Monday to Friday			
IVIIX	Offisional Avenue	excluding Bank Holidays			
MW	Walm Lane	8am – 6.30pm Monday to Saturday			
IVIVV	waiiii Laiic	excluding Bank Holidays			
N	Kenton	8am – 6.30pm Monday to Saturday			
IN	Remon	excluding Bank Holidays			
NC	Neasden Town Centre	8am – 6.30pm Monday to Saturday			
10	Neasuell Town Centre	excluding Bank Holidays			
NS	Neasden Town Centre	8.30am – 6.30pm Monday to Friday			
INO	Neasuell Town Centre	excluding Bank Holidays			
NT	Normanby Road	8.30am – 6.30pm Monday to Friday			
Normanby Road		excluding Bank Holidays			
Park Royal		7am to 7pm Monday to Saturday			
Park Royal		excluding Bank Holidays			
QA	Ou conchum.	10am – 3pm Monday to Saturday			
QA	Queensbury	excluding Bank Holidays			
	Condlesses	7am – 7pm Monday to Saturday			
S	Sudbury	excluding Bank Holidays			
۲.	Coordination of	10am – 3pm Monday to Friday			
SA	Sudbury	excluding Bank Holidays			
011	0	8am – 6.30pm Monday to Saturday			
SH	Sudbury Hill	excluding Bank Holidays			
СТ	Cudhum Tour	8am – 6.30pm Monday to Saturday			
ST	Sudbury Town	excluding Bank Holidays			
_	Drawfield Dead	At Any Time			
Т	Brentfield Road	including Bank Holidays			
14/	M/ b l I EII	8am – 9pm every day			
W	Wembley Hill	including Bank Holidays			

Appendix 2 - Parking Permit Terms and Conditions

Parking Permits

- 2. Permits are only available for vehicles with a maximum length of 6.5m, maximum height of 2.5m and a maximum weight of 3.5 tonnes. Permits which are vehicle-specific may only be used for the vehicle to which the permit is assigned as indicated in the application form to obtain the permit. The person making the application will be the permit holder to whom the permit is issued.
- 3. Permits are restricted per household. The maximum number of permits that can be purchased per eligible household is limited to the following;
 - three resident permits
 - one Visitor Household permit
 - three Event Day permits
 - two Event Day Visitor permits
 - o one Visitor permit for zones W,E and T.
- 4. The maximum number of permits that can be purchased per eligible business or organisation is limited to the following;
 - o three business permits
 - three Event Day business permits
 - o three Business permits for zone LP
 - o three Business Address permits for zone LP
 - three Doctors permits
 - o up to twenty Event Day place of worship or schools permits.
- 5. If a paper permit has been issued it must be clearly displayed in the windscreen of the vehicle to which it relates, so that the particulars on the permit are readily visible from the front near-side of the vehicle windscreen. Failure to display clearly may result in the issue of a Penalty Charge Notice. Where a virtual permit (electronic permit) has been issued, there is no need to display anything on the vehicle. However, applicants must ensure their permit application is received and processed by the Council. This will be evidenced by a permit reference number, which is available from the permit holder's online parking account.
- 6. Permits are NOT transferable from one person to another. Permits remain the property of the Council and the permit holder must surrender the permit to the Council if required to do so. Vehicle specific permits are only valid for the vehicle shown on the permit. Visitor permits (Visitor Household, Event Day visitor and visitor permits for zones W, E and T) can only be used by bona fide visitors visiting the permit holder.
- 7. A permit does not give the permit holder the right to park outside their particular house/property or work place, nor does it guarantee the availability of a parking space.
- 8. Resident permits enable the holder to park in any resident or permit holder bay or shared use (Resident/Permit Holders and Pay & Display) bay within the Zone shown on the permit. The visitor household permit allows parking in any resident or permit holder bay or shared use bay, only in the street / part of the street within the Zone shown on the permit. Business permits enable the permit holder to park in a business bay or permit holder bay or shared use bay within the Zone identified on the permit. Vehicles must be parked within the markings or the permitted bays or spaces available.
- 9. Charges for parking permits in Brent are as notified by the Council on its website and other means of notification to the public and permit holders.

- 10. A resident, visitor or business permit does not entitle a holder to park in: Pay & Display only bays; Loading bays; Doctor bays; Taxi ranks; Disabled bays; Personalised Disabled Bays; Motorcycle bays; Car club bays; Yellow line restrictions; a different zone within the borough from that shown on the permit; a Controlled Parking Zone operated by another borough (unless specific authorisation is given in writing by either Borough); Suspended bays (it is the permit holders responsibility to check that the bay is not suspended on a daily basis).
- 11. The driver should always check the signs and that the bay is not suspended before parking to ensure that the vehicle will be parked legally and within the bay markings. On Wembley Stadium Event Days, additional event related restrictions come into force and will be displayed via signage in the streets. Failure to check and comply with the signage and notices in the streets and failure to park legally may result in the issue of a Penalty Charge Notice and removal of the vehicle.
- 12. Permits must be surrendered if the holder changes address or ceases to own or use the vehicle for which the permit was issued.
- 13. Business permits must be surrendered if the holder ceases to work for the business, the business ceases trading or relocates outside of the Zone, or the holder ceases to own or use the vehicle for which the permit was issued.
- 14. A new permit must be sought in the event of a change of vehicle. Any change of vehicle must be notified immediately to the Council's Parking Service and the original permit must be surrendered.
- 15. The house/premises ("property") to which the permit application relates MUST NOT be in a car free development area. A "Car Free Development" is a special area covered by an agreement made under Section 106 of the Town & Country Planning Act 1990; or is a
 - development area for which planning permission has been granted and there is a condition that the area is to be kept car free. Therefore, occupants of properties in this area are not entitled to parking permits issued by the Council. Any existing permits issued must be surrendered when an area becomes a Car Free Development or the Council may revoke permits already issued if a property becomes part of a Car Free Development. This may be done on immediate notice.
- 16. It is the responsibility of the permit holder to renew the permit on time. Any renewal reminders (letters, messages or emails) may be sent as a courtesy and are not a legal requirement. The permit holder remains fully responsible for permit renewal, regardless of whether they have or have not received a renewal reminder.
- 17. Permit holders who surrender their permits shall be entitled to a refund of up to a maximum of one third of the remaining value of the permit.
- 18. As part of the Council's Policy to prevent fraud and misuse of permits, proof of address and proof of vehicle ownership can be requested at any time after the issue of a permit. Failure to co- operate and to provide the Council with the necessary information may result in cancellation of the permit.
- 19. If a permit is lost, stolen, destroyed, defaced or mutilated, the permit holder must notify the Parking Service immediately and the permit will cease to be valid. A replacement permit will be issued for the unexpired period of the original permit and an administration fee of £15 will be charged.
- 20. The Council reserves the right to cancel a parking permit where the vehicle owner is identified as a Persistent Evader of payments for contraventions of parking regulations or the Council's requirements in relation to use of Parking Permits. A vehicle owner can be classed as a 'Persistent Evader' if there are three or more recorded contraventions in respect of the same vehicle within the Borough of Brent in the period of up to five years, and the penalties due for these contraventions have

either not been paid in full, have not been represented or appealed against by the vehicle owner within the statutory time limits, or the representations and appeals for the owner have been rejected and they have still not paid the penalties due in full.

"Alternatively Fuelled" Vehicles

- 21. Alternatively fuelled vehicles include a vehicle that is powered by an energy source separate or in addition to petroleum (petrol) or diesel. Examples can include hybrid vehicles (whereby a small petrol or diesel engine is accompanied by an electrical power source/motor, liquefied petroleum gas (LPG) and natural gas power sources. Brent Council does not offer a discount for any alternatively fuelled vehicles.
- 22. Brent Council will use DVLA records to ascertain a vehicle's CO2 emissions in order to calculate the cost of a resident emissions based parking permit.

Visitor Parking

- 23. Resident's visitor parking permits may now be purchased for two hour, four hour or all day parking sessions.
- 24. Visitor parking permits can be used to activate a parking session either online, by SMS, using the Council's automated telephony service, or by telephoning the Parking Service Contact Centre.
- 25. Parking sessions can be booked in advance either online or by telephoning the Contact Centre. Parking sessions booked using SMS or the automated telephony service will start at the time of booking.
- 26. Visitor parking permits are only available for use by residents who receive genuine visitors at the address relevant to the permit.
- 27. A visitor parking permit is only valid if the vehicle registration number, date and time that parking is required is supplied to the Council. The permit is only valid for use in the Controlled Parking Zone shown on the permit.
- 28. Parking is only permitted on street in any resident or permit holder bay or shared use bay during controlled hours (as displayed on street signs, within the Zone specified on the permit).
- 29. A visitor parking permit does not allow parking in off street car parks, in designated on street Business bays, Disabled bays, Personalised Disabled Bays, Car Club Bays, Doctors bays, Loading Bays, Pay and Display only bays, Suspended Bays, Housing Estates or other private land, or on yellow lines.
- 30. The booking of a parking session using a visitor parking permit does not guarantee the availability of a parking space.
- 31. No refund will be given for any unused and /or expired visitor parking permits.
- 32. The use of parking bays may be suspended by Police Officers, Civil Enforcement Officers or duly authorised Council Officers at any time without notice. Civil Enforcement officers or Council officers can request to inspect parking permits at any time.
- 33. Vehicle must be parked wholly within parking bay markings.
- 34. Visitor parking permits are issued subject to the relevant Traffic Management Orders of the London Borough of Brent and may be subject to change in the future.
- 35. Visitor parking permits are NOT FOR RESALE, and are not transferable.
- 36. A maximum of 300 all day visitor parking permits may be purchased per annum per household.

Privacy Notice

- 37. You are providing your information to Brent Council, contact details Parking.permits@brent.gov.uk. The Council's Data Protection Officer can be contacted via dpo@brent.gov.uk, or 020 937 1402.
- 38. Your information is collected for the purpose of administering parking controls or schemes including data supplied in an application (or renewal) for a Parking Permit for the purposes of parking administration, management, and enforcement including investigation of possible parking and traffic contraventions or related offences or for any purpose relating to the parking services offered in the borough of Brent. The data may also be used for these purposes by Brent Council's agents and contractors and may be disclosed to enforcement agencies or other London authorities for these purposes.
- 39. The Council is under a duty to protect the public funds it administers, and to this end the information may be shared with law enforcement agencies and other bodies responsible for auditing or administering public funds for the purpose of prevention and detection of fraud.
- 40. The information shall be retained for Four years and shall be processed in adherence to your legal rights, including but not limited to the right to withdraw consent, right to copies of your information and right to be forgotten. You have a right to lodge a complaint with the Information Commissioner's Office (www.ico.org.uk).
- 41. Further information can be found at www.brent.gov.uk/privacy

General Notice

- 42. The Council will investigate any cases of suspected fraud or misuse of the permit and visitor parking schemes. If we find evidence of fraud or misuse we will suspend the account holder's parking account and withdraw the facility to purchase permits. We may also cancel permits (including visitor parking permits) already purchased, which may render the vehicle owner liable to pay a Penalty Charge and possible vehicle removal & storage fees. We may also prosecute where we consider that fraud or intentional misuse has taken place.
- 43. To the extent legally permissible the Council excludes liability for damage, loss or injury howsoever caused to any person, property or any vehicle or its load or content whilst in any parking space or on entering or leaving the parking space, whether such entry or exit is under the control of the vehicle driver, the Council or any third party.

By applying for or purchasing any type of permit (including visitor parking permits), the applicant accepts the Council's terms and conditions. The London Borough of Brent reserves the right to amend these terms and conditions for parking permits, application procedures and parking charges at any time.

Appendix 3 - Criteria for Personalised Disabled Persons' Parking Places

Mobility

- 1. Applicants must hold a Brent issued valid Blue Badge.
- 2. Applicants must be receiving the DLA Higher rate of Mobility Component (for example help getting around) for an indefinite period or the enhanced rate of the Mobility Component of PIP. A copy of the Disability Benefit and copy of the up to date rate Department of Pensions must be provided. The higher rate of Attendance Allowance will also be accepted for applicants aged 65 or over.
- 3. Applicants must be driving their own car or nominate a carer who drives them who also resides at the same address (proof of name and address to be supplied). The vehicle must be parked at that address for the majority of the time during the day.

Parking

- 4. If applicants do not drive and has appointed a nominated carer to drive for them, the carer must receive the Carer's Allowance award. A copy of the Carer's Allowance must be provided. As in number 3, the carer must reside at the same address. Proof of name and address must be provided with application.
- 5. Applicants must have no access to off street parking facilities. Where off street parking exists, applicants may be required to provide proof that this facility is not available for their use or demonstrate that the facilities are either unsuitable for the use of a disabled person due to the nature of their disability, or unsuitable for their vehicle. This may take the form of, for example, a Tenancy Agreement or Property Deeds.
- 6. If all of the above criteria have been met and if applicable, the applicant must then have mobility assessment (assessment as in established Blue Badge System used by Social Services, which will be modified to identify those with greatest mobility restriction). Applicants using additional mobility aids, sticks, wheelchair etc will provide written evidence of this use.
- 7. Applicants must agree to be visited at home, should this be necessary, in order for the Council to carry out further investigations, including contacting applicants before or after issuing a Disabled Person's Parking Place permit, to ensure that the address on the application is correct.
- 8. The following on site conditions will be taken into consideration:
 - Interests of traffic movement in the area and parking demand in the area
 - Interests of owners and occupiers of adjoining properties
 - The need to maintain access to premises
 - Road safety considerations
- 9. Personalised Disabled Person's Parking Places will be operational at all times.

Appendix 4 - Council-run car parks in Brent

Car Park			Num	ber of	spaces			Charged Hours	24h? (Y/N)	Park- mark (Y/N)
	Car spaces	Disabled spaces	Business spaces	P2W spaces	Parent / child spaces	Elect. Veh. spaces	TOTAL	(Bank holidays are charged as normal unless explicitly stated)		
Barham Park	15	0	0	0	0	0	15	Monday to Friday - 10am to 3pm Sunday – no charge Wembley event days - 10am to 12 midnight Bank Holidays - 10am to 12 midnight	Y	N
Brent Civic Centre (operated on behalf of the Council by)	146	9	0	21	3	(47)**	179*	Monday to Sunday – at all times	Y	N
Disraeli Road	74	0	0	0	0	0	74	Monday to Friday – 8am to 8pm Saturday and Sunday – no charge	Υ	N
Kingsbury Road	25	4	15	4	0	0	48	Monday to Saturday – 8am to 6.30pm	Υ	N
Lonsdale Avenue	33	0	0	0	0	0	33	Sunday – no charge	Y	N
Neasden Town Centre	38	0	0	0	0	0	38	Wembley event days – 8am to midnight	Υ	N
Northwick Park	93	3	0	0	0	0	96	Monday to Friday – 8am to 6pm Saturday and Sunday – no charge Bank Holidays – no Charge	N	N
Preston Road	155	3	0	0	4	2	164	Monday to Saturday - 8am to 6.30pm Sunday – no charge Wembley event days - 8am to midnight	Partly (top level only)	Y
Salusbury Road	29	1	11	0	0	0	41	Monday to Saturday – 8am to 6.30pm	Y	Y
St. Johns Road	67	3	0	6	0	2	78	Sunday – no charge	Υ	Υ
Wendover Road	25	0	0	0	0	2	27	Wembley event days – 8am to midnight	Υ	N
Total Spaces	554	14	26	10	4	6	614			

^{*} Not all spaces are available for public parking **Available as general parking when not in use for vehicle charging

Standard PCN Codes As at November 2019

On-Street

Code	General	Description	Diff.	Notes
01	suffix(es) aoyz	Parked in a restricted street during prescribed hours	level Higher	Suffixes y & z for disabled badge holders only
02	ао	Parked or loading / unloading in a restricted street where waiting and loading / unloading restrictions are in force	Higher	no de la comp
04	CS	Parked in a meter bay when penalty time is indicated	Lower	
05	cpsuv1	Parked after the expiry of paid for time	Lower	
06	cipv1	Parked without clearly displaying a valid pay & display ticket or voucher	Lower	
07	cmprsuv	Parked with payment made to extend the stay beyond initial time	Lower	'meter feeding'
08	С	Parked at an out-of-order meter during controlled hours	Lower	Electronic meters only
09	ps	Parked displaying multiple pay & display tickets where prohibited	Lower	
10	р	Parked without clearly displaying two valid pay and display tickets when required	Lower	"two" may be varied to another number or "multiple".
11	gu	Parked without payment of the parking charge	Lower	
12	rstuwy4	Parked in a residents' or shared use parking place or zone without a valid virtual permit or clearly displaying a valid physical permit or voucher or pay and display ticket issued for that place where required, or without payment of the parking charge	Higher	
13		RESERVED FOR TfL USE (LOW EMISSION ZONE)	n/a	
14	89	Parked in an electric vehicles' charging place during restricted hours without charging	Higher	
16	bdehqstwxyz4569	Parked in a permit space or zone without a valid virtual permit or clearly displaying a valid physical permit where required	Higher	Suffix "s" only for use where bay is completely non-resident
17		RESERVED FOR ROAD USER CHARGING USE	n/a	

40	1.1.0	11.2	Lie.i.	T
18	bcdefhmprsv12356 789	Using a vehicle in a parking place in connection with the sale or offering or exposing for sale of goods when prohibited	Higher	
19	irsuwxyz4	Parked in a residents' or shared use parking place or zone with an invalid virtual permit or displaying an invalid physical permit or voucher or pay and display ticket, or after the expiry of paid for time	Lower	
20		Parked in a part of a parking place marked by a yellow line where waiting is prohibited	Higher	
21	bcdefghlmnpqrsuv 1256789	Parked wholly or partly in a suspended bay or space	Higher	
22	cflmnopsv1289	Re-parked in the same parking place or zone within one hour after leaving	Lower	"one hour" may be varied to another time period or "the prescribed time period"
23	bcdefghklprsv1237 89	Parked in a parking place or area not designated for that class of vehicle	Higher	Suffix required to fully describe contravention
24	bcdefhlmpqrsv125 6789	Not parked correctly within the markings of the bay or space	Lower	
25	n2	Parked in a loading place or bay during restricted hours without loading	Higher	On-street loading bay or place
26	n	Parked in a special enforcement area more than 50 cm from the edge of the carriageway and not within a designated parking place	Higher	"50 cm" may be varied to another distance in Scotland.
27	no	Parked in a special enforcement area adjacent to a footway, cycle track or verge lowered to meet the level of the carriageway	Higher	
28	no	Parked in a special enforcement area on part of the carriageway raised to meet the level of a footway, cycle track or verge	Higher	
29	j	Failing to comply with a one-way restriction	n/a	
30	cflmnopsu12789	Parked for longer than permitted	Lower	
31	j	Entering and stopping in a box junction when prohibited	n/a	
32	jdt	Failing to proceed in the direction shown by the arrow on a blue sign	n/a	Code-specific suffixes apply.
33	jbcefghikqrsyz	Using a route restricted to certain vehicles	n/a	Code-specific suffixes apply.
34	j0	Being in a bus lane	n/a	
35		Parked in a disc parking place without clearly displaying a valid disc	Lower	
37	j	Failing to give way to oncoming vehicles	n/a	
38	jlr	Failing to comply with a sign indicating that vehicular traffic must pass to the specified side of the sign	n/a	Code-specific suffixes apply.

46 n Stopped where prohibited (on a red route or clearway) Higher 47 jn Stopped on a restricted bus stop or stand Higher 48 j Stopped in a restricted area outside a school, a hospital or a fire, police or ambulance station when prohibited 49 Parked wholly or partly on a cycle track or lane Higher	ed" may be varied to "waiting" can be used on a restricted utside a school only
displaying a valid disabled person's badge in the prescribed manner Stopped in a parking place designated for diplomatic vehicles Higher Parked in a parking place designated for police vehicles Higher Stopped on a cycle docking station parking place Higher stopped on a taxi rank Higher Stopped on a taxi rank Higher Stopped where prohibited (on a red route or clearway) Higher This place Stopped on a restricted bus stop or stand Higher Stopped in a restricted area outside a school, a hospital or a fire, police or ambulance station when prohibited Parked wholly or partly on a cycle track or lane Higher	can be used on a restricted
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or ambulance station when prohibited area out 49 Parked wholly or partly on a cycle track or lane Higher	
FO 11 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	
50 Jiru Performing a prohibited turn n/a Code-sp	pecific suffixes apply.
51 j Failing to comply with a no entry restriction n/a	
52 jgmsvx Failing to comply with a prohibition on certain types of vehicle n/a Code-sp	pecific suffixes apply.
53 j Failing to comply with a restriction on vehicles entering a pedestrian n/a zone	
54 j Failing to comply with a restriction on vehicles entering and waiting in a pedestrian zone	
A commercial vehicle parked in a restricted street in contravention of the Overnight Waiting Ban	
Parked in contravention of a commercial vehicle waiting restriction Higher Non- ov	vernight waiting restriction
57 Parked in contravention of a bus ban Higher Non- ov	vernight waiting restriction
valid permit	Lorry Control Scheme
of permit conditions	Lorry Control Scheme
or land between two carriageways	pecific suffixes apply.
road other than a carriageway	pecific suffixes apply.
Parked with engine running where prohibited Lower	

67		Using a vehicle on a restricted street without a valid safety permit	n/a	Direct Vision Standard
72		RESERVED FOR BUILDERS' SKIPS CONTRAVENTIONS		
75		RESERVED FOR LITTERING FROM MOTOR VEHICLES		
76		RESERVED FOR WASTE RECEPTACLE CONTRAVENTIONS		
99	no	Stopped on a pedestrian crossing or crossing area marked by zigzags	Higher	Pedestrian Crossings

Off-Street

	Parked in a loading place or bay during restricted hours without loading	Higher	Off-street loading areas
	Parked in an electric vehicles' charging place during restricted hours without charging	Higher	Off-street car parks
u	Parked without payment of the parking charge	Lower	Off-street car parks
prs	Using a vehicle in a parking place in connection with the sale or offering or exposing for sale of goods when prohibited	Higher	Off-street car parks
	RESERVED FOR DVLA USE	n/a	
u	Parked for longer than permitted	Lower	Off-street car parks
0	Parked in a restricted area in a car park	Higher	Off-street car parks
puv4	Parked after the expiry of paid for time	Lower	Off-street car parks
4	Parked in a car park without clearly displaying a valid pay & display ticket or voucher or parking clock	Lower	Off-street car parks
u	Parked with payment made to extend the stay beyond initial time	Lower	Off-street car parks
btrwyz45	Parked without a valid virtual permit or clearly displaying a valid physical permit where required	Higher	Off-street car parks
prs	Not parked correctly within the markings of a bay or space	Lower	Off-street car parks
	Parked in a designated disabled person's parking place without displaying a valid disabled person's badge in the prescribed manner	Higher	Off-street car parks
	Vehicle parked exceeds maximum weight or height or length permitted	Higher	Off-street car parks
	prs u o puv4 4 u btrwyz45	Parked in an electric vehicles' charging place during restricted hours without charging U Parked without payment of the parking charge prs Using a vehicle in a parking place in connection with the sale or offering or exposing for sale of goods when prohibited RESERVED FOR DVLA USE U Parked for longer than permitted O Parked in a restricted area in a car park puv4 Parked after the expiry of paid for time 4 Parked in a car park without clearly displaying a valid pay & display ticket or voucher or parking clock U Parked with payment made to extend the stay beyond initial time btrwyz45 Parked without a valid virtual permit or clearly displaying a valid physical permit where required prs Not parked correctly within the markings of a bay or space Parked in a designated disabled person's parking place without displaying a valid disabled person's badge in the prescribed manner	Parked in an electric vehicles' charging place during restricted hours without charging u Parked without payment of the parking charge Lower prs Using a vehicle in a parking place in connection with the sale or offering or exposing for sale of goods when prohibited RESERVED FOR DVLA USE n/a u Parked for longer than permitted Lower o Parked in a restricted area in a car park Higher puv4 Parked after the expiry of paid for time Lower 4 Parked in a car park without clearly displaying a valid pay & display ticket or voucher or parking clock u Parked with payment made to extend the stay beyond initial time Lower btrwyz45 Parked without a valid virtual permit or clearly displaying a valid physical permit where required prs Not parked correctly within the markings of a bay or space Lower Parked in a designated disabled person's parking place without displaying a valid disabled person's badge in the prescribed manner

90	psuv	Re-parked in the same car park within one hour after leaving	Lower	Off-street car parks. "one hour" may be varied to another time period or "the prescribed time period"
91	cg	Parked in a car park or area not designated for that class of vehicle	Higher	Off-street car parks
92	0	Parked causing an obstruction	Higher	Off-street car parks
93		Parked in car park when closed	Lower	Off-street car parks
94	p	Parked in a pay & display car park without clearly displaying two valid pay and display tickets when required	Lower	Off-street car parks. "two" may be varied to another number or "multiple"
95		Parked in a parking place for a purpose other than that designated	Lower	Off-street car parks
96		Parked with engine running where prohibited	Lower	Off-street car parks







Cabinet 20 July 2020

Report from the Director of Finance

Heat Billing and Metering Methodology

Wards Affected:	All
Key or Non-Key Decision	Key
Open or Part/Fully Exempt	Open
No. of Appendices:	None
Background Papers	None
	Olga Bennet, Head of Finance olga.bennet@brent.gov.uk; Tel: 020 8937 3337
Contact Officer(s):	Catherine Arotsky, Senior Energy & Sustainability Manager catherine.arotsky@brent.gov.uk; 020 8937 2942
	Francesca Campagnoli, District Heating Manager, francesca.campagnoli@brent.gov.uk, Tel: 0777 666 5837

1.0 Purpose of the Report

- 1.1 The report presents the methodology for billing residents for heating and hot water at residential properties which are metered for heat (i.e. a communal heating system rather than individual heating systems) to meet Council objectives and ensure compliance with the Heat Networks (Metering and Billing) Regulations 2014.
- 1.2 This methodology applies to the new units at Gloucester & Durham in the first instance

2.0 Recommendations

That Cabinet:

2.1 Approve the option and implementation of credit billing for heating and hot water in residential communal system's and incorporate a heat meter as set out in this paper.

- 2.2 Approve the in house management of the billing for heating and hot water residential properties at Gloucester & Durham as set out in this paper;
- 2.3 Approve the setting of tariffs in accordance with the guidance set out by the Heat Trust (in the absence of any current regulation on heat prices)¹
- 2.4 Delegate authority to the Director of Finance, in consultation with the Strategic Director of Community Wellbeing and the Deputy Leader of the Council and Lead Member for Resources to agree a metering and billing policy in line with the recommended option set out in paragraphs 5.2 5.5 and thereafter implement and operate the policy subject to such modifications as he considers necessary.

3.0 Summary

- 3.1 As part of the Council's commitment to build 1,000 new Council homes over five years, Brent Council have purchased 235 new flats being built on the land formally occupied by Gloucester House and Durham Court (site referred to as Gloucester & Durham throughout this report). The first new flats were due to be occupied in June 2020, however first occupation is currently delayed due to Covid-19 and the site having to pause work. Hand over is now scheduled for the end of August/beginning of September and a process for billing tenants for tenants of these units will need to be in place by then.
- 3.2 Telford Homes (who are building the new homes at Gloucester & Durham) have incorporated heat meters in accordance with the Heat Networks (Metering and Billing) Regulations 2014.
- 3.3 The Heat Networks (Metering and Billing) Regulations 2014 require that any system which provides heat to more than one final customer (for example a communal heating system), each customer should be billed for their heat based on usage. This is subject to technical and financial viability. As Gloucester & Durham are new build properties part of the specification allowed for meters to be installed, therefore there are no technical barriers to metering. Billing for heat is a well-established industry and it should, therefore, be economic to bill for heat. Further information in the Heat Networks (Metering and Billing) Regulations 2014 is outlined in the Legal Implications section.
- 3.4 As the building will be managed by Brent Council, the Council must therefore decide how we will bill the residents.
- 3.5 This paper sets out the recommendation that the Council should utilise Credit Billing for this block and that this should be managed in-house.
- 3.6 This paper also outlines the importance of regularly reviewing tenants' usage. This is in order to inform tenants if they are using more heat than would be expected and also alert the Council to potential fuel poverty issues, where a tenant might not be heating their property as necessary due to concerns about cost.

¹ There is a consultation on how the heat market can be regulated which is likely to include guidance on setting the price of heat.

3.7 The proposal is to start with the 83 units at Gloucester & Durham in South Kilburn and extend this methodology across all the units in Gloucester & Durham once complete.

4.0 Background

- 4.1 In communal heating systems, the heating and hot water is supplied centrally by the landlord or its agent. Resident would have no option to change supplier for heating and hot water. This is standard for all homes connected to communal or district heating schemes.
- 4.2 In line with regulations, the resident has the opportunity to choose their electricity supplier.
- 4.3 Communal and district heating systems offer opportunities to meet the Council's climate emergency objectives and are an appropriate strategy for large new build or refurbished blocks flats, as they are designed to have very low demands for heat, as opposed to the alternative inefficient system of each flat having its own boiler. Also, gas systems can present a fire risk in large blocks of flats, whilst electric based systems would require additional space for a hot water cylinder and are often expensive to run.
- 4.4 The existing blocks in South Kilburn incorporate a number of different types of heating systems each with their advantages and disadvantages. The main types are:
 - 4.4.1 Existing communal heating systems which offer minimal control to the resident. The heating in these systems is often switched off from May to September irrelevant of the weather. The residents find that their flats may be warm, although often too hot, particularly if the weather is hot but the heating is still on. If they cannot control their heating, then there is a lot of wasted energy which impacts our climate and increases the cost of running these systems.
 - 4.4.2 Electric storage heaters and dual immersion hot water cylinders connected to an Economy 7 tariff. The residents complained that by the evening their properties were cold and that they often ran out of hot water particularly those with large families. They also noted that it was expensive.
- 4.5 As a large landlord, Brent have a duty of care to offer a competitive price for heat for residents connected to these schemes as well as ensuring that they comply with legislation.
- 4.6 There are a few things which need to be considered:
 - 4.6.1 whether to use credit billing or pay as you go
 - 4.6.2 whether to have the billing function in house or use a third party
 - 4.6.3 How the tariff would be set how much would be a fixed standing charge and how much would be variable

4.7 As a large landlord, Brent bill the residents for different things, such as caretaking. However, there is nothing, currently, which is billed specifically on how much the occupant uses.

Consultation

- 4.8 Residents in South Kilburn were invited to three consultation events:
 - 4.8.1 Specific consultation events discussing the provision of heat were held at Craik Court, 13th January 2020 and 22nd January 2020
 - 4.8.2 A presentation was made at the Tenant Steering Group on 15th January 2020 where residents discussed the proposals.
- 4.9 The overarching response to the proposals for new communal heating systems was that residents preferred to have control of their heating and liked that they would have unlimited hot water. They understood that this would have to be charged for. They were reassured that charging would be in accordance with guidance (the Heat Trust) and that this would give them a mechanism to appeal if they felt the charges were too high.

5.0 Detail

5.1 The Heat Networks (Metering and Billing) Regulations 2014 include the requirement that heat and hot water supplied in communal systems must be billed based on usage where technically and financially viable. Therefore all new build or newly supplied communal heating systems must incorporate metering.

Pay As You Go (PAYG) or Credit Billing

- 5.2 Many residents on existing communal heating systems are not billed based on their usage. The cost of their heat is included in their standing charge but they also don't have a lot of control of their heat. If it is not possible to control your heat in terms of when you want heat and what temperature you want the room to be at, it would be unreasonable to bill based on usage.
- 5.3 Many communal heating systems which have meters use Pay as you Go meters, similar to electricity and gas pre-payment meters. This gives the resident complete control of their system and helps the resident understand how much they are using.
- 5.4 This system also ensures that residents do not accumulate debt as they have to top up their meter to get hot water and heating.
- 5.5 As outlined in the Financial Appraisal, Pay as you Go systems are more expensive for the resident as a third party is usually required to manage the system. There need to be ways for people to top up. This would usually require a shop or other facility residents can go to, but this can also be managed by telephone and online. This would necessitate a call centre and a website (or an app).

- 5.6 Pay as you Go systems can also accumulate the standing charge while a resident is on holiday or away from their flat for other reasons. This means that on their return, they may not have hot water or heating until they have topped up their heat meter.
- 5.7 With Pay as you Go systems, if a resident is unable to top up their meter, for example if they are struggling to pay their bills (e.g. in fuel poverty), then the supply of heating and hot water would be stopped to their property until they top up their meter.
- 5.8 The alternative approach is Credit Billing. This system ensures a regular cost throughout the year. It is recommended that this is billed weekly with the weekly rent bill.
- 5.9 The cost for each flat will be set based on calculations of what each flat is likely to use. This will then be reviewed, at least quarterly, but ideally monthly, to ensure that residents aren't using too much or too little heat. It's important to understand why a resident may use too little heat, as we don't want anyone to be cold because they are worried about the cost.
- 5.10 Credit billing offers advantages to the residents and the Council in that there is a regular payment which can be monitored.
- 5.11 The disadvantage is where residents accumulate debt. The Council already have policies on debt management.
- 5.12 Credit Billing will require, in particular initially, a high level of administration, however, reports from other Boroughs, including Camden who use Credit Billing extensively, is that this can be managed.
- 5.13 This credit billing will be calculated annually. At the end of the year, a reconciliation will be carried out. If a customer has used less heat than expected, then there will be the option of them applying for a rebate or it will appear as a credit on their bill. Their payments the following year would be reviewed depending on the level of overpayment. If customers have used more heat than expected, the instalments will be increased for the following year.
- 5.14 For Gloucester & Durham, Telford Homes have installed meters using the GURU protocol. GURU is a metering system which allows a company to purchase the data from GURU Systems for the purposes of billing, either Pay as you Go or Credit Billing.
- 5.15 With both billing systems, residents can be notified if they are using significantly more or significantly less than expected. Data is provided monthly by GURU systems and officers will communicate this information to residents in a format agreed with Housing officers to ensure appropriate and effective communication.
- 5.16 The Heat Supply Agreement would be with the named tenant or leaseholder on the landlord's contract. We recommend that this is included in a revised tenancy and leaseholder agreement. This is in line with other London Boroughs (eg Camden) and has been shown to be simple to administer.

Third party or in-house credit billing?

- 5.17 Many communal heating systems use third parties to manage their billing. These companies have a lot of experience in the sector and already have many of the processes in place.
- 5.18 The Financial Appraisal outlines that using a third party is likely to be more expensive than managing this system in-house.
- 5.19 The Council would need to create the resource to manage Credit Billing inhouse.
- 5.20 Other Local Authorities, such as Camden, already manage Credit Billing effectively in-house. It is cost effective for the residents and gives the Council control of the tariffs.
- 5.21 It was agreed that it would be preferable if we were able to manage the billing in-house. In particular it would mean that residents only receive their bills from Brent Council and not from a third party.
- 5.22 There are also other advantages highlighted including:
 - 5.22.1 Brent Council would need to access the usage data as the landlord to ensure the scheme is operating efficiently anyway.
 - 5.22.2 It is estimated that managing the billing in-house will be cheaper in total once a larger number of properties are billed.
 - 5.22.3 The data would also be used to engage with customers falling into arrears, enabling us to tackle financial inclusion and offer support.
 - 5.22.4 By starting with a small number of properties, the Council will gain experience which they can build-on as more properties are added to the scheme.
- 5.23 The recommendation is therefore to undertake Credit Billing in-house subject to an annual review.

Tariff Setting

- 5.24 This Paper recommends that the tariff is comprised of two elements: a standing charge and a variable element.
- 5.25 The standing charge will be a fixed daily amount regardless of how much energy is used. Initially, it will cover the fixed costs associated with the communal heating system such as the data licence and broadband for metering and billing, internal staff costs directly associated with the scheme, insurance, and business rates. This could be adjusted in the future to achieve other Council objectives.
- 5.26 The standing charge will be calculated based on the actual cost of operating the communal heating system at Gloucester & Durham. In the first year, it will be based on informed forecasts, then adjusted in subsequent years to reflect

- actual cost incurred in the previous year. So the price could increase (or decrease) each year.
- 5.27 The variable element would be a charge per unit of heat. So customers who use more heat pay more in total. This covers the cost of gas and/or electricity used to generate heat. It is recommended that the charge per unit of heat is the same for all times of day and no matter how much energy is used.
- 5.28 There are a number of alternatives to this:
 - 5.28.1 It is possible to charge simply a 'rate per unit heat' i.e. not to have a standing charge at all. This means that there will be more incentives for customers to reduce their energy usage and would therefore fit better with Brent's Climate Emergency declaration. This is because customers who use small amounts of heat will pay less than the recommended option (para 5.2 to 5.6). Clients that use a lot of heat will pay more than the recommended option. This creates a greater incentive for customers to reduce their heat usage. However, it is possible that there would be vulnerable customers who may end up paying more if their heat usage is high.
 - 5.28.2 It is possible to have a tiered rate. For example, this could mean that the cost is Xp per kWh of heat for first 1,000kWh, but then it's less than Xp/kWh for the next 1,000kWh and so on. This would be more difficult to explain to customers but could also create some incentive to reduce heat use to this threshold.

6.0 Financial Implications

Tariff

- 6.1 The tariff to customers will be calculated using the methodology set out in para 5.24-5.27 prior to residents moving in to Gloucester & Durham. This will include a standing charge and variable element which will be adjusted based on individual actual usage.
- 6.2 The proposal in this paper relates to the element of the standing charge in relation to the administration of meter data and billing.

Administrative costs

- 6.3 In-sourcing administrative cost: It is estimated that the administrative cost of billing would be circa £72 per property (once all 235 homes are completed) if the function is delivered in-house.
- Outsourcing administrative cost: If a third party is appointed, the administrative cost would be around £129 per annum per property once all 235 units are completed. This includes £99 charge from the third party, £12 plus some internal resource to use the data to monitor the effectiveness of the system as a whole.
- 6.5 These administrative costs will be recovered through the heat charges to tenants.

- 6.6 Some of the initial administrative and set-up cost will be covered by the HRA as part of the build until all 235 units are completed, so that tenants experience the same administrative cost before and after Phase 2 is completed.
- 6.7 An additional licence from Guru Systems could give Brent access to a data metering and a diagnostic feature which costs £25 per property per annum. This feature can be used for monitoring the heating system performance in communal areas and the building as a whole. This feature would be useful from an Asset Management perspective as it would allow feedback to ensure the system is operating efficiently thereby reducing energy use (and the subsequent reductions in cost and carbon). This is likely to be included within the service charge.

7.0 Legal Implications

- 7.1 Under Section 11 of the Local Government (Miscellaneous Provisions) Act 1976 (as amended by the Electricity Act 1989), local authorities may generate and sell heat and electricity, and may also purchase and supply heat.
- 7.2 The Heat Network (Metering and Billing) Regulations 2014 (the "Regulations") apply to new and existing district heat networks or communal heating systems. The Regulations place three key obligations on heat suppliers, namely:
- 7.2.1 Notify notify the Secretary of State on or before the first day of operation new district heat networks or communal heating systems;
- 7.2.2 Install meters install a building level meter in multi-occupancy building at the heat exchanger or entry point; install final customer meters for new buildings or major renovations²; ensure all meters accurately measure, record and display heat consumption; and where meters have been installed, install temperature control devices; and
- 7.2.3 Bill provide billing information at least twice per year. If a final customer requests e-billing, which must be available, billing information must be at least quarterly; ensure bills and billing information is accurate and based on actual consumption; and not profit from the billing process.
- 7.3 Should the Council decide to proceed with the recommendations made by Officers in this report, relevant technical, commercial and legal support will continue to be required respect of appropriate contractual in documentations/billing documents between the Council and the customers/residents and delivery of the scheme in general.

8.0 Equality Implications

8.1 An Equality Impact Assessment has been completed and is being reviewed by the Equalities team.

8.2 The proposals in this paper are to minimise charges to residents overall.

² There are further requirements within the regulation to install meters in existing schemes where it is economic to do so. There is currently no definition of 'economic'.

- 8.3 Spreading the cost of heating through the year (credit billing) helps low income households.
- 8.4 If a fully variable rate was chosen, residents using small amounts of heat would be likely to have reduced bills (compared to a standing charge plus variable cost) and residents using high amounts of heat would be likely to have higher bills (compared to a standing charge plus variable cost). If elderly people have on average higher heat usage, they may be disadvantaged by a purely variable rate.
- 8.5 Loss of income due to prolonged unemployment or ill health will impact on the ability to budget for bills and energy usage. The in-house billing resource together with housing will be able to address individual cases and sign post for specialist support.

9.0 Human Resources/Property Implications (if appropriate)

9.1 It is recommended that there is in house management of the billing for heating and hot water. This will require an internal resource of 0.5FTE. Should it be necessary to recruit to this post, all the relevant HR policies and procedures will be followed.

10.0 Proposed Consultation with Ward Members and Stakeholders

- 10.1 In January 2020, the South Kilburn DEN Project Team ran three community engagement events. These were advertised widely to all residents of buildings which are part of the South Kilburn Regeneration Programme and were attended by around 80 people. These events were interactive and formed the basis for recommending the billing, metering and tariff setting method in this Paper.
- 10.2 The key important point for residents was the predictability of billing in terms of cost and even spread over each month of the year.

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MINESH PATEL

Director of Finance





Cabinet 20 July 2020

Report from the Strategic Director of Community and Wellbeing

Parking Enforcement on Council Housing Estates

Wards Affected:	All						
Key or Non-Key Decision:	Key						
Open or Part/Fully Exempt:	Open						
No. of Appendices:	Appendix 1: Projected Cost Appendix 2: Estates Survey Plan Appendix 3: Housing Sites Survey Plan Appendix 4: Prioritised Site Plans Appendix 5: Project Phases						
Background Papers:	None						
Contact Officer(s):	Hakeem Osinaike Operational Director of Housing hakeem.osinaike@brent.gov.uk Tel: 020 8937 2023 Emily-Rae Maxwell Head of Housing and Neighbourhoods Emily-Rae.Maxwell@brent.gov.uk Tel: 020 8937 1131 Mahmut Aydogan Estate Services Manager Mahmut.Aydogan@brent.gov.uk						

1. Purpose

1.1. Brent Housing Management (BHM) is in the process of reviewing its approach to parking enforcement on Council owned housing estates. Currently, BHM operates parking enforcement through a contract with Wing Parking (Wings). Changes in legislation has limited the effectiveness of this service and the Council has continued to receive complaints from residents, Councillors and emergency services regarding obstructive and inconsiderate parking from both residents and non-residents of the estates.

- 1.2. This report sets out how the Council intends to introduce Off Street Controlled Parking (OSCP) through a Traffic Management Order (TMO) on land owned within the Housing Revenue Account (HRA). The report sets out two options for a parking enforcement service, both of which involve implementing OSCP but different in approach to how it is managed.
- 1.3. The report proposes that the agreed approach is first piloted on five sites with an aim to roll out to all Council owned Housing estates later.
- 1.4. The proposal is informed by recommendations from a commissioned review carried out by the Project Centre Limited (PCL), who are parking consultants.

2. Recommendations to Cabinet

It is recommended that Cabinet

- 2.1. Note the contents of the report and approve the proposal to introduce Off Street Controlled Parking through Traffic Management Orders on land owned by the Council within its Housing Revenue Account.
- 2.2. Delegate authority to the Strategic Director for Community Wellbeing, in consultation with the Strategic Director for Regeneration and Environment, to carry out statutory consultation in relation to proposed Traffic Management Orders, consider the consultation responses and thereafter, subject to any modifications as he sees fit, to make and implement Traffic Management Orders on land owned by the Council within its Housing Revenue Account.
- 2.3. Endorse Option Two as the preferred service delivery option, as set out in paragraphs 4.8.6 to 4.8.12 of the report. This option involves implementing Off Street Controlled Parking through a Traffic Management Order and following implementation, varying the Council's contract with SERCO to enable them manage the scheme.
- 2.4. Note the proposed five pilot sites as set out in paragraph 3.8 of the report and approve the approach to further roll out, subject to an evaluation report, consultation with residents and approval of the capital investment required.
- 2.5. Agree to charge residents £50 per annum per vehicle for their parking permits under Off Street Controlled Parking schemes on Council estates.

3. Background

- 3.1. Brent Housing Partnership (BHP) contracted Wings to undertake enforcement action on Council owned Housing estates and this contract was in operation from 01 August 2012. The Council now contracts with Wings.
- 3.2. In 2012, the government introduced The Protection of Freedoms Act 2012, which reduced Wing Parking's ability to take any meaningful and effective

- enforcement action. The Act stopped Wings from accessing information from the Driving Vehicle Licensing Agency (DLVA) and as such, any parking tickets issued cannot be pursued unless driver's details are already known.
- 3.3. This has made it difficult to control parking from non-residents on Housing estates. Meaning, Wings can only enforce parking tickets against the residents who have purchased permits. The 2012 Act also makes it illegal for the Council or its contractors to remove or clamp vehicles on private land without a TMO.
- 3.4. The following table shows the percentage of Parking Charge Notices (PCN) issued by Wings on Housing estates that were paid, by year.

2015	2016	2017	2018	2019
49%	39.7%	31.6%	29.3%	28.2%

- 3.5. Following on-going complaints from residents, Councillors and emergency services regarding obstructive and inconsiderate parking by both residents and non-residents of the estates, BHM set out to review alternative options for parking enforcement on Council housing sites.
- 3.6. This report focuses specifically on five sites that have been identified as a priority by BHM, residents and elected Members. These sites will be used as a pilot for the new approach to parking enforcement.
- 3.7. In order to find a sustainable solution for the parking issues on the Housing sites, a project was commissioned by BHM between September 2018 and March 2019, in collaboration with the Parking and Highways teams in Environmental Services, to consider the introduction of more effective parking controls.
- 3.8. This project identified five priority sites in consultation with elected Members and residents. The sites are:
 - Alexandra Court
 - Windmill Court
 - Seymour Court
 - Landau House
 - Joules House

Further details regarding the five sites, including maps, can be located in Appendix 4.

- 3.9. Under this project, BHM carried out informal and formal consultations with residents in the five priority sites. Discussions focused on the current parking issues and potential solutions and ultimately, the introduction of OSCP through a TMO.
- 3.10. The introduction of OSCP would require residents to purchase a permit. Initially, it was proposed that this should be aligned to the cost of a typical resident permit for Controlled Parking Zones (CPZ) on the public highway. The current

(2020/21) average price of a single standard parking permit in the Council's CPZ is £92 a year, a substantial increase in the existing permit charge of £10 a year.

- 3.11. Following the informal and formal consultations on targeted sites during 2018/19, it was established that the residents saw the proposed fee (then £88) as excessive and would therefore not support OSCP.
- 3.12. BHM offered an alternative solution, carrying out estate improvement works with an aim to reduce access and capacity issues caused by inconsiderate parking. At Alexandra Court, BHM repainted parking lines, placed new signs on the estate, installed bollards, extended/narrowed accesses to the bins and parking areas; and extended the existing on-street parking controls to the area of public highway outside the north gate to deter obstructive parking at this site. Unfortunately, the reconfiguration of Alexandra Court, although alleviated the issues, did not fully resolve inconsiderate parking.
- 3.13. This issue is not limited to Brent Council, the Pan-London estate parking platform highlighted the majority of London Borough are considering or currently implementing OSCP.
- 3.14. London Borough of Southwark and Royal Borough of Kensington & Chelsea (RBKC) are two boroughs who have successfully introduced the scheme on the majority of their housing sites. RBKC, who have achieved better success than most, adopted the following approach:
 - Recruited a consultant who mapped out all parking sites, established the improvements that needed to be made on each site and quantified the overall cost to the Council.
 - Carried out informal and formal consultation across the housing sites and introduced off street controlled parking, where there was clear resident support for the scheme and/or where H&S issues could not be resolved without off street controlled parking.
 - Carried out tailored improvements (lining and signing, roads and parking areas surface improvement, electronic gates, etc.) for the sites where large majority of residents did not support OSCP and/or where there were no H&S concerns for the sites.
 - Provided designated parking bays for the Blue Badge holders on each site.
- 3.15. The implementation of the scheme took over two years. The changes have now been embedded and they no longer have major parking problems on their Housing sites.
- 3.16. RBKC currently charges £47 for the permits. The reduction in charges for permits played a significant role in persuasion of their residents to support

- OSCP scheme. Their current charges for permits in that borough also comfortably cover the management and enforcement cost for the scheme.
- 3.17. BHM therefore, appointed the PCL to assist with reviewing, redesigning and recommending the best option to manage the parking situation on each site.
- 3.18. It is important to note, the Highways and Infrastructure service is developing a Brent Parking Management Strategy this year ahead of the expansion of the Ultra-Low Emission Zone in October 2021. Consideration will be given to the findings of Estate Parking Management Project in developing this strategy including the effects of potential parking displacement.
- 3.19. PCL has also been commissioned to support the development of the Brent Parking Management Strategy in 2020. Information on the Estate Parking Project will be included in the strategy.

4. Options appraisal

- 4.1. With the change in legislation and the current experience of an unenforceable scheme, it has become clear that a TMO is the only way to resolve the parking issues on Housing estates.
- 4.2. TMOs are legal documents drafted and made by the Council, usually under the Road Traffic Regulation Act 1984. They regulate the use of public highways for movement and parking by drivers of vehicles and pedestrians. They also regulate off-street parking areas (normally Council car parks). TMO's can also be used to regulate parking on streets or in 'off street' areas that are not designated as public highway.
- 4.3. To achieve the desired level of quality and service delivery, officers believe there are two options available.
- 4.4. The options appraisal aims to establish the most efficient and effective option for the future service delivery in line with the Council's broader service delivery objectives.
- 4.5. Both options are based on a two phased approach. These are introduction of OSCP scheme to the five prioritised estates and roll out of the scheme to other agreed relevant Council estates.
- 4.6. Under both options, BHM will be able to carry out a comprehensive assessment of the sites, develop bespoke solutions for those sites and carry out necessary improvements concerning the surface of roads and parking areas through PCL.
- 4.7. Under both options, it is proposed that the contract with Wings will continue until an alternative scheme is in place.
- 4.8. The two options are as follows:

Option One- Implement OSCP through a TMO and following implementation, either extend Wings contract or retender for a new contractor to manage the scheme.

- 4.8.1. Under this option, the Council may resolve current parking issues through an incremental approach and through using internal resources and the current contractor.
- 4.8.2. The process of resolving parking issues may require tendering of the service, which may further prolong the required urgent solutions for addressing parking issues, and there are cost implications and legal requirements regarding the OJEU threshold.
- 4.8.3. The Health and Safety issues on the sites and the lack of enforcement have become one of the major concern for residents, which require an urgent solution and holistic approach to resolve the current challenges. The incremental approach to current parking issues may not necessarily provide the desired outcome.
- 4.8.4. The residents' confidence in the current contractor is low. This may become a significant obstacle to get the necessary support from residents for the proposed solutions during the consultation period.
- 4.8.5. The business base for the current contractor has significantly reduced since the change in legal provision. They are therefore, facing serious challenges to survive and sustain their business in the market.

Option Two— Implement OSCP through a TMO and following implementation, vary the Council's contract with SERCO to enable them manage the scheme.

- 4.8.6. This option will require a variation to the Serco contract, which may only be varied provided it complies with Regulation 72 of the Public Contracts Regulations 2015. Environmental Services have confirmed that adding Housing sites for management and enforcement to the contract will only form a small proportion of the current £25m+ turnover of the contract. That may assist in meeting the requirements of Regulation 72 of the Public Contracts Regulations 2015. The cost of variation to contract will also be variable, based on uptake of permits and issuing of PCN.
- 4.8.7. In addition, it will also enable BHM to have a new contractual framework for the enforcement through the current contractor SERCO for an effective and efficient implementation of OSCP schemes on the housing sites.
- 4.8.8. SERCO advises that they have the capability through their existing IT system to issue permits and accommodate visitor bookings.
- 4.8.9. This approach provides the advantage of fully legitimising the Council's approach to vehicle parking enforcement on Housing land and offers consistency between the enforcement regimes in the Council's Housing

- car parks and its other off--street car parks. The Council's Parking and Lighting service would manage enforcement carried out by SERCO and BHM will have a SLA with them.
- 4.8.10. The Parking service has advised that the revenue raised from permits charged at £50 p.a. per vehicle should be sufficient to cover all operational costs. The charges for PCNs will be consistent with on street charges (£130- discounted by 50% for early payment).
- 4.8.11. Using SERCO and their expertise in the field will result in development of a holistic and more effective solution to the current urgent parking issues, as they have been providing similar services to Brent and other local authorities in London
- 4.8.12. Following the implementation of the project on prioritised housing sites and the project outcomes, BHM will have better perspective about the overall cost, appropriate permit charges, and effectiveness of the scheme before rolling out the scheme to the rest of Housing sites.

4.9. The table below provides a more detailed analysis of Options One and Two.

	Option One	Option Two
Staffing/	Advantages	Advantages
People	Continuity in service delivery through the current contract	SERCO to provide the service in line with the specification through their
		current staff or recruiting additional staff
	The contractor will carry all operational risks linked to	The contractor will carry all operational risks linked to people management
	people management function	function
	Extensive knowledge of the sites and site related issues	Contractor will be able to draw staff from a larger pool, to cover leave and
	across the borough	sickness absence
		Extensive experience and expertise re enforcement and ability to remove
		obstructively parked vehicles (tow away). Systems in place for the issuing
		of residents permits.
		Seamless and consistent borough wide service
ס	Disadvantages	Disadvantages
Page	Lack of confidence in the contractor due to historical poor	
Φ	level of enforcement and staff visibility	
$\overrightarrow{\Omega}$		
Nalue for	Advantages	Advantages
money	Competitive tendering may provide opportunity for more	Established effective service provider with capability to deliver more
	efficient and effective service delivery	efficient and effective service delivery through existing infrastructure, which
		may potentially reduce the in contract costs through economy of scale.
	District to	Bullion
	Disadvantages	Disadvantages
	Profit/surplus is kept by the contractor	
	Initial cost of investment in the modernisation of parking services	Initial cost of investment in the modernisation of parking services
	Reduced capability in term of providing efficient and	
	effective service due to reduction in their business base	
	and poor confidence in their service delivery	
TUPE	Advantages	Advantages
	None	None
	Disadvantages	Disadvantages

	None	None
Service	Advantages	Advantages
quality	Contractor is in better position to utilise more efficient and effective service delivery mechanism due to their profit orientation	Contractor is in better position to utilise more efficient and effective service delivery mechanism
		Currently providing effective service delivery in line with the contract specification for On-street controlled parking across the borough
	Disadvantage	Disadvantage
	Residents highly dissatisfied with the quality of current service	
Resident	Advantages	Advantages
engagement	It provides an opportunity to engage residents and to use their feedback to design the new service delivery model and	It provides an opportunity to engage residents and to use their feedback to design the new service delivery model and involve them in the future service
Page	involve them in the future service improvement/development	
je		
<u> </u>	Advantages	Advantages
† Proportunities / Risks	Re-alignment of the service regarding the Council's service transformation objectives and future strategic direction	Re-alignment of the service regarding the Council's service transformation objectives and future strategic direction
	Investment in the infrastructure and improvement in the operation	Investment in the infrastructure and improvement in the operation
	Improvement in the specification and performance management framework	Improvement in the specification and performance management framework
		Consistency between the enforcement regimes in the council's housing car parks and its other Off street car parks.
	Disadvantages	Disadvantages
	Inconsistency between enforcement regimes across the Council	
	A skills gap which is likely to result in cost and time implications for staff training and mentoring	

5. Implementation of the two options

- 5.1 The preferred option (option two) would first be piloted on the five prioritised sites and then rolled out to other 123 designated sites, following formal consultation with residents.
- 5.2 This would be subject to the introduction of a TMO following approval of the proposed approach by Cabinet.
- 5.3 Due to various dependencies, the completion of the whole project is likely to take between 18 24 months and further details regarding the project phases can be located in Appendix 5.
- 5.4 PCL has already completed the survey for the prioritised five sites, prepared an inventory plan and recommended OSCP for these sites. The survey, inventory plan and recommendations for the remaining 123 sites to be completed by June/July 2020.
- 5.5 To implement the above plan, PCL will draft the TMOs for Highways & Infrastructure and implement the scheme. They will follow the same process for all remaining Council sites and aim to complete the survey, inventory plan and propose recommendation for each site by July 2020.
- 5.6 PCL will also assist with the preparation of consultation documents, providing information including FAQ's on their website, responding to enquiries and the analysis. Unfortunately, it will now not be possible to arrange public exhibitions due to government social distancing requirements in response to the coronavirus pandemic but alternatives will be explored. Officers will however explore ways of delivering this virtually.

6. The projected cost and income

- 6.1 The cost and income revenue projections for this project are extremely challenging due to several variables and unknowns. Some of key variables and unknowns are as follows:
 - Quantifying the cost of improvements required to the estate parking and roads surfaces.
 - The number of PCNs that will be issued and enforced per annum.
 - The number of permits required for residents and visitors per annum.
 - The number of sites where OSCP Schemes will be implemented, as it depends on the outcome of consultations, H&S condition on each site and political will to implement such schemes.
 - The cost of signs/ lines and improvement to the surface of parking areas and road across the estate.
 - Service specifications.

- Contract price to deliver the service.
- 6.2 The figures provided in the followings projections therefore, need to be assessed with caution.
- 6.3 The projected costs for prioritised and remaining housing sites for implementation of all phases of the project are based on the information the Project Centre gathered from the sites that they have already mapped out. Further details regarding this can be located in Appendix 1.
- 6.4 Accordingly, the projected total capital cost for implementation of all phases of the project for prioritised and remaining sites respectively will be £74,391 and £902,047
- 6.5 The above figures do not take into account the ongoing cost of staff required for enforcement, their uniforms and equipment or the cost of paying a contractor to deliver the service, as these costs depend on the scope and specification of the service. These ongoing costs would instead be met by revenue from the proposed £50 p.a. permit charge.
- 6.6 The provided projected cost may also significantly go above the provided figures, due to potential improvement required to the surface of the roads and parking areas.
- 6.7 In addition, the figures are based on the assumption that the Council will implement OSCP on all housing sites. This may not be possible due to lack of residents' support and we may have to develop tailored solutions for some of these sites outside the scope of OSCP.
- 6.8 Consequently, depending on the result of consultation with residents and various other factors, the actual cost may significantly be more than the projected cost.
- 6.9 There were approximately 2,444 residents and visitors permits for 71 sites by the end of March 2020. Assuming we extend parking control to the remaining 123 sites, the projected number of permits issued for all sites will be around 6,700.
- 6.10 If BHM charge £50 per permit, the total projected annual income from permit will be £333,350. Under the current regime, residents tend not to buy permits due to lack of enforcement. BHM will be able to issue more permits under OSCP, as demand for permits will be much higher under OSCP due to effective enforcement. It is therefore, reasonable to project that the revenue from permits will be higher.
- 6.11 Wing Parking also issued 1,755 PCNs for 71 sites during 2019. See table below.

	Num	bers o	of PCNs	issued	during	2019 I	y Win	g Park	ing Ltd	d -71 s	sites		
	Jan	Feb	March	April	May	June	July	Aug	Sept	Oct	Nov	Dec	Total
No. of PCNs issued during month	133	122	84	178	177	143	118	139	154	174	188	145	1755

- 6.12 Based on the current number of PCNs issued by the contractor during 2019, the projected number of PCNs that could be issued and enforced by BHM may be in the region of 5,000 per annum (£300K p.a. with 50% discount), if BHM implement OSCP for all 194 sites.
- 6.13 However, due to the lack of enforcement under the current scheme, the PCNs issued by the contractor during the last 5 years has reduced by 60%. It is therefore reasonable to project that the number of PCNs would initially be noticeably increased under OSCP and the potential income revenue from PCNs will be much higher in the immediate short term than the above figure, though the projected figure may later reduce due to effective enforcement and debt recovery.
- 6.14 There are two source of income under the OSCP schemes:
 - Income from permits
 - Income from PCNs
- 6.15 Permit and PCN income from Housing estates will be collected by the contractor and then credited to the Parking Services account (client). They will retain all the permit income to meet the enforcement and their (the client) own costs.
- 6.16 Parking Services will also monitor PCN's income from Housing estate PCN issuance, estimate income and make the necessary deduction for notice processing and appeal costs. The remaining PCN revenue will be a surplus for transfer to HRA.
- 6.17 The recommended £50 for permits will therefore, enable BHM to meet the ongoing management and enforcement cost. However, it is not possible to guarantee that surplus from PCNs through these schemes will gradually pay off the initial capital cost, as it depends on the numbers of sites where the Council will implement OSCP, the number of PCNs that will be issued and the proportion of debt successfully recovered.
- 6.18 The recently purchased development at Gloucester & Durham, come with parking spaces. The parking spaces for the s.106 block, originally bought by Notting Hill Genesis, were planned to be let at £300 per year and colleagues had advertised this to potential tenants. However, the spaces for the 'for sale' block was bought by the Council for £20,000 each. Letting these at £300 per

- year would mean a loss of £500 to the HRA, for each parking space i.e. £23,000.
- 6.19 As part of our purchase of the s.106 scheme at Grand Union, we are negotiating the purchase of car parking spaces. They have been offered to us at £25,000 per space. At £300 a year, this will not be a viable purchase but if we don't buy it, our tenants are not likely to be able to park in spaces available within the block they live.
- 6.20 In order to avoid a multi-tier system, where tenants on one estate pay a different parking charge to others, it is proposed that an initial charge of £300 per year will be levied across all sites.

7. Financial Implications

- 7.1 There are two potential income streams being considered through OSCP schemes, £50 per annum for permits and £130 for penalty charge notices (PCN) with 50% discount for early payment. It is estimated within Regeneration and Environment finances, that revenue of £50 per permit will be sufficient to cover the unit cost of paying and managing the SERCO contract.
- 7.2 Revenue from PCN is received in the Council General Fund to cover costs in relation to notice processing and appeals, any surplus will be transferred over to the HRA. It is anticipated that unauthorised parking will significantly reduce, once Council has the powers to successfully pursue enforcement. Reduction of PCN's will mean that it is unlikely there will be sufficient surpluses generated to cover capital outlay and ongoing maintenance costs incurred in the HRA.
- 7.3 The estimated cost of £0.07m for implementing OSCP in five pilot sites in housing estates, will be met from within existing HRA resources for the 20/21 financial year, through re-allocation of budgeted resources.
- 7.4 The estimated capital cost of implementing OSCP in the remaining 189 sites across Brent housing estates is £0.9m. The HRA capital budgets currently do not have provision for this expenditure. This larger investment is of course subject to approval from the capital investment and governance process.
- 7.5 There will be a requirement for ongoing funding in the HRA to maintain the offstreet parking infrastructure, the cost implications will be known once surveys have completed.

8. Legal Implications

8.1 Under the Road Traffic Regulation Act 1984 (RTRA 1984), a local authority has powers to designate parking places on and off the highway, to charge for use of them, and to issue parking permits for a charge.

- 8.2 The Council will only be able to enforce parking control on its housing estates and take enforcement action if it is able to target such action against the registered keeper of an unauthorised vehicle. This could be done by making Traffic Management Orders under the relevant provision of the Road Traffic Regulation Act 1984 and then enforcing them under the provisions of the Traffic Management Act 2004. Under the 2004 Act the Council would have access to DVLA records to find the registered keeper of the vehicle.
- 8.3 The proposals in this report relate to off street controlled parking and do not involve on street controlled parking and as a result, income and expenditure in relation to off street parking can be made within the Council's Housing Revenue Account ("HRA") if the areas of land that are subject to off street controlled parking are on HRA land. Under section 55 of the Road Traffic Regulation Act 1984, parking enforcement local authorities must keep account of their income and expenditure in respect of on-street parking places and any surplus must be applied towards specific purposes as set out in section 55(4) of the 1984 Act and the proposals in this report will be outside the ambit of section 55 of the 1984 Act.
- 8.4 Officers recommend at paragraph 2.2 the variation of the existing contract with Serco to cover enforcement as the preferred service delivery option. Any variation of the Serco contract must fall within one of the permitted grounds for variation as set out in Regulation 72 of the Public Contracts Regulations 2015 (PCR 2015). In paragraph 4.8.6, it is indicated that Environmental Services have confirmed that adding Housing sites for management and enforcement to the contract will only form a small proportion of the current £25m+ turnover of the contract. Further information regarding management and enforcement costs will be required however to establish that the proposed variation meets the requirements of Regulation 72 of the PCR 2015.

9.0 Equality Implications

- 9.1 The proposal will lead to an enhanced service to council tenants and leaseholders with the permit revenue paying for much more effective enforcement and therefore protecting residents' own parking.
- 9.2 BHM will assess the need for the 'Disabled Parking Bays' and ensure residents with Blue Badge' have sufficient parking bays on each site.

10.0 Consultation with Ward Members and Stakeholders

10.1 Ward members and stakeholders will also be consulted during the relevant phase of the project.

11.0 Human Resources/Property Implications

11.1 None

Report sign off:

PHIL PORTER

Strategic Director of Community and Wellbeing







HOUSING ESTATE IMPLEME	NTATION COST SUMMARY	
Pilot sites	£	74,391
Remaining sites (189)	£	902,047
Total cost	£	976,439

PROJECT PHASE	HOUSING ESTATE IMPLE	MENTATION COST BREAKDOWN (PILOT SITES)						
ROJ →H	Pilot sites =	5						
₾ _	Item	Item detail	Iter	n cost	Quantity	Tot	tal cost	Notes / assumptions
⋖	Survey and design		£	-	0	£	-	No further costs, included within existing 75k project
	Consultation	Consultation plan	£	300	5	£	1,500	Optional
		Design and print of flyer	£	2,300	1	£	2,300	
В		Web consultation page, online survey, phone line	£	600	5	£	3,000	
		and report						
		Postage / delivery	£	0.5	1000	£	500	3rd party postage cost. Assumes 200 addresses per site
		Face to face engagement	£	500	0	£	-	Omitted
	Traffic orders	New multi-part parent traffic order, notices and	£	12,000	1	£	12,000	
		statement of reasons						
		Map schedules	£	200	0	£	-	
S		Cost for publishing proposal notices in press	£	750	2	£	1,500	Provisional sum for 3rd party costs
		Log statutory consultation objections	£	500	5	£	2,500	
		Stautory consultation report	£	500	5	£	2,500	
		Cost for publishing proposal notices in press	£	750	2	£	1,500	Provisional sum for 3rd party costs
	Signs and lines	Contactor costs	£	15,466	1	£	15,466	See tab for cost breakdown
		Final revision of contractor plans	£	150	5	£	750	
		Supervision of contactor	£	175	5	£	875	Optional. Assumes 1 visit per site
	Back office	Project Manager Salary	£	30,000	0	£	30,000	Unknown internal cost
		Back office salary	£	-	0	£	-	Unknown internal cost
		CEO incidentals (uniform, equipment)	£	-	0	£	-	Unknown internal cost
	TOTAL					£	74,391	





PROJECT PHASE	HOUSING ESTATE IMPLEN	MENTATION COST BREAKDOWN (REMAINING SITE	S)					
ROJECT	Remaining sites =	189						
<u> </u>	Item	Item detail	Ite	m cost	Quantity	То	tal cost	Notes / assumptions
⋖	Survey and design		£	-	0	£	-	No further costs, included within existing 75k project
	Consultation	Consultation plan	£	300	189	£	56,700	Optional
		Design and print of flyer	£	2,300	6	£	13,800	Assumes one standard document for each of the 6 housing estate areas
Ω.		Web consultation page, online survey, phone line and report	£	600	32	£	18,900	Assumes one standard document for each of the 6 housing estate areas
		Postage / delivery	£	0.5	37800	£	18,900	3rd party postage cost. Assumes 200 addresses per site
		Face to face engagement	£	500	0	£	-	Omitted
	Traffic orders	New multi-part parent traffic order, notices and statement of reasons	£	12,000	0	£	-	No new parent required. An amending order only will be required, see next line
		Amendment order	£	5,000	1	£	5,000	
		Map schedules	£	150	189	£	28,350	Reduced item cost (compared to x5 sites) through volume efficiency
S		Cost for publishing proposal notices in press	£	1,500	2	£	3,000	Provisional sum for 3rd party costs
		Log statutory consultation objections	£	100	189	£	18,900	Reduced item cost (compared to x5 sites) through volume efficiency
		Stautory consultation report	£	100	189	£	18,900	Reduced item cost (compared to x5 sites) through volume efficiency
		Cost for publishing proposal notices in press	£	1,500	2	£	3,000	Provisional sum for 3rd party costs
	Signs and lines	Contractor costs	£	3,093	189	£	584,622	See tab for cost breakdown
		Final revision of contractor plans	£	100	189	£	18,900	
		Supervision of contactor	£	175	189	£	33,075	1 visit per site
	Back office	Project Manager Salary	£	80,000	0	£	80,000	
		Back office salary	£	-	0	£	-	Unknown internal cost
		CEO incidentals (uniform, equipment)	£	-	0	£	-	Unknown internal cost
	TOTAL					£	902,047	

SIGN SCHEDULE

Estate Name		Permit holders par		Resid	ents permit holder	s only	Visi	tor permit holders	only	Zone er	ntry sign	Motorcycle only		
	Estate Identifier	Sign Ref: A Sign Ref: B			Sign Ref: C			Sign Ref: D		Sign Ref: E				
		NP (89mm)	ιc	NP (76mm)	w	ιc	NP (76mm)	w	ιc	NP (89mm)	ιc	NP (76mm)	w	LC
Windmill Court	E-WC	2		2	12									
Alexandra Court	E-AC	1		1	4									
Seymour Court	E-SC	1		3		2								
Landau House	E-LH	2		4	1									
Joules House	E-JH	1		2	2		1							
	TOTAL	7	0	12	17	2	1	0	0	0	0	0	0	0

Item		Item cost	Quantity	1	Total cost
76mm 3.5m post	£	100.00	20	£	2,000
Fit sign plate to 76mm post	£	25.00	20	£	500
TRAFFIC SIGNS AND ROAD MARKING: Sign Faces - Regulatory and Warning: Circular sign face to class RA2 to BS EN 12899 on aluminium plate fixed to new or existing post (post measured separately): 400mm rectangular	£	84.00	39	£	3,276
Removal of existing sign or post	£	30.00	57	£	1,710
Contingency			20%	£	1,497
Total signs cost for 5 pilot estates				£	8,983

 Note:
 NP
 New Post

 LC
 Lamp column

 W
 Wall

 SP
 Existing sign post

LINE SCHEDULE

	Estate name	DYL(m)	White line(m)	
J	Windmill Court	277	588	
	Alexandra Court	328	190	
	Seymour Court	102	252	
	Landau House	166	208	
	Joules House	136	185	
	TOTAL (m)	1009	1423	

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Item	Item cost	Quantity	To	otal cost
Thermoplastic paint (white)	£ 1.50	1423	£	2,135
Thermoplastic paint (yellow)	£ 2.00	1009	£	2,018
Waterblasting of existing markings (provisional sum)	£ 500.00	1	£	500
Text (DISABLED etc) (provisional sum)	£ 750.00	1	£	750
Contingency		20%	£	1,081
Total signs cost for 5 pilot estates	The state of the s	£	6,483	

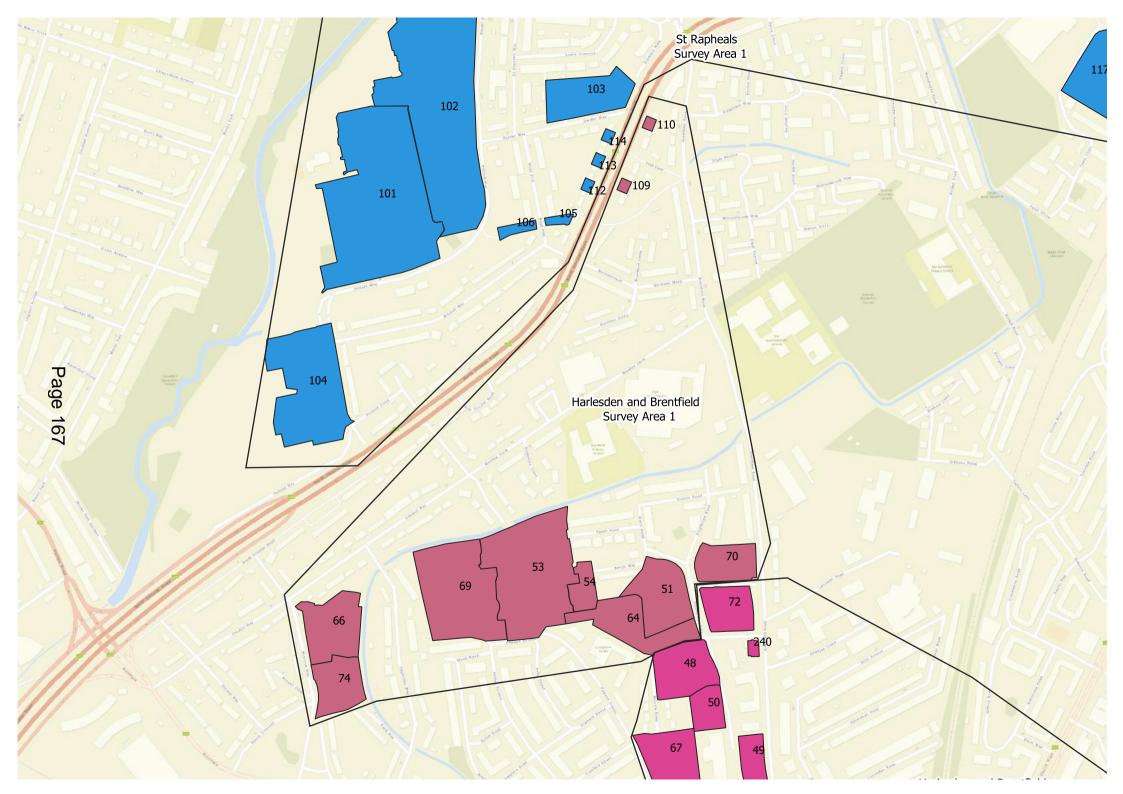
<<< THE ITEM COSTS IN THIS TABLE
ARE AN ESTIMATE BASED ON SIMILAR
PROJECTS BUT THE VALUES SHOULD BE
REFINED TO MATCH BRENTS
CONTRACTORS SCHEDULE OF RATES</p>

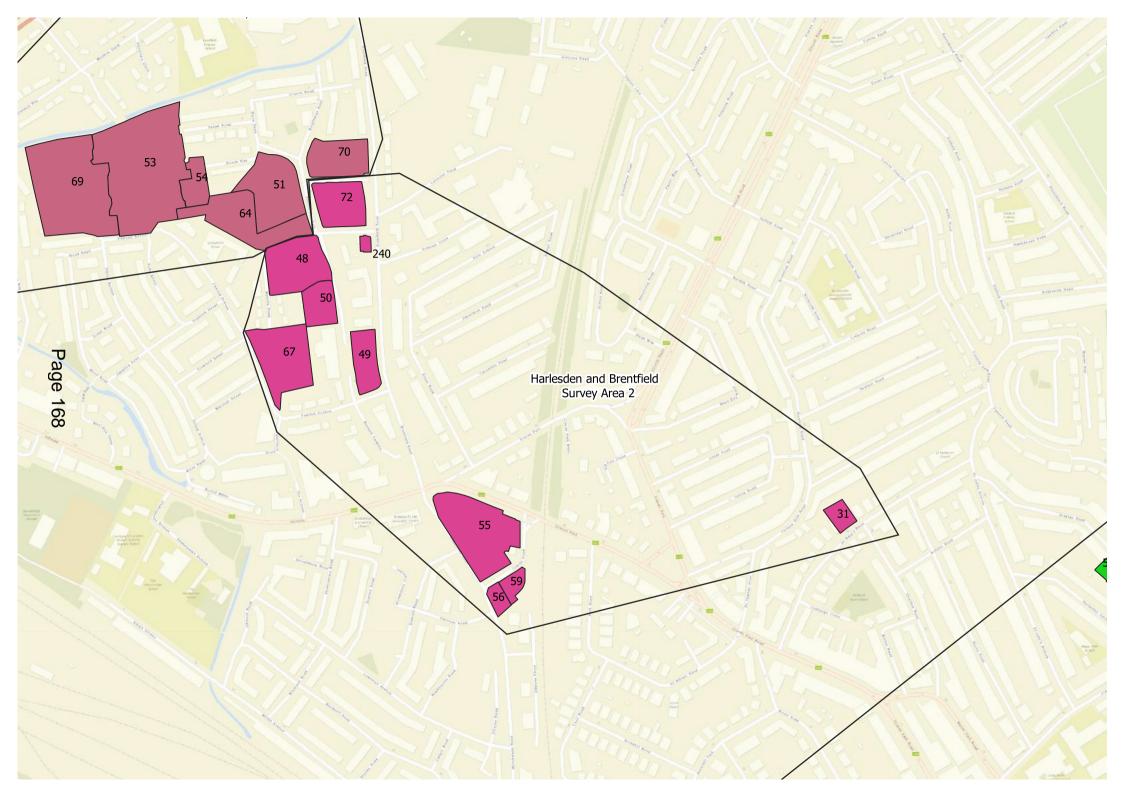
TOTAL COST FOR SIGNS AND LINES FOR 5 PILOT ESTATES	£	15,466
AVE SIGNS COST PER ESTATE	£	1,797
AVE LINES COST PER ESTATE	£	1,297
AVE TOTAL COST PER ESTATE (SIGNS AND LINES)		3,093

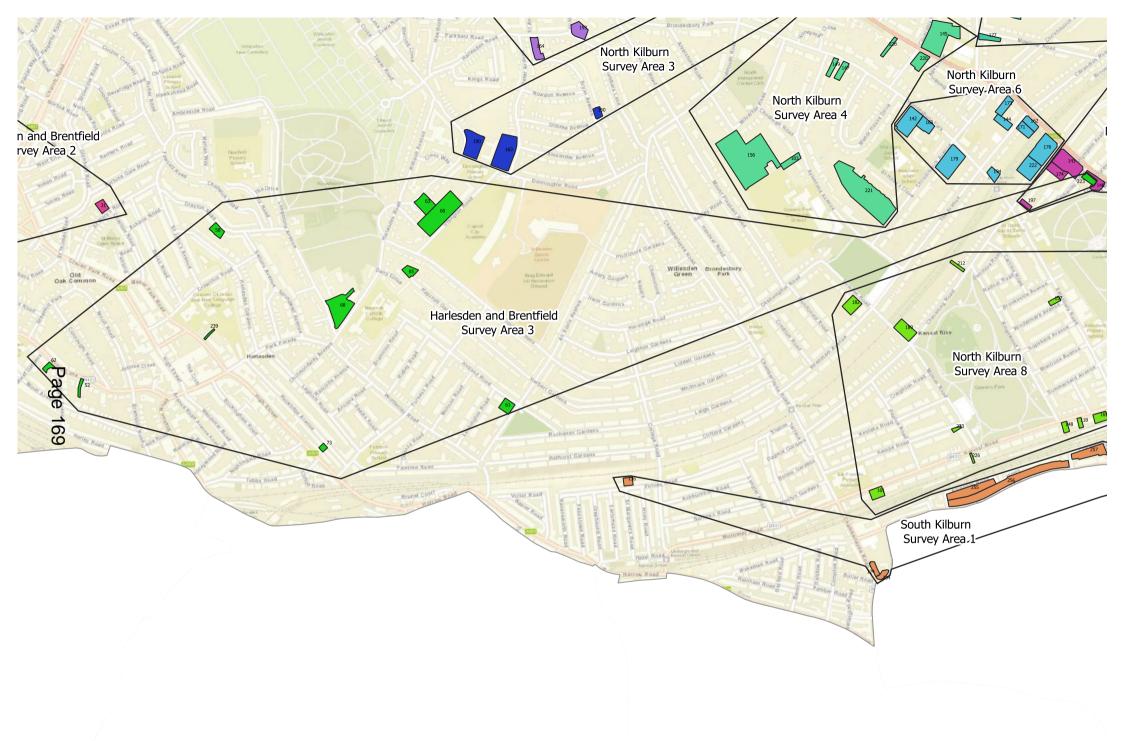
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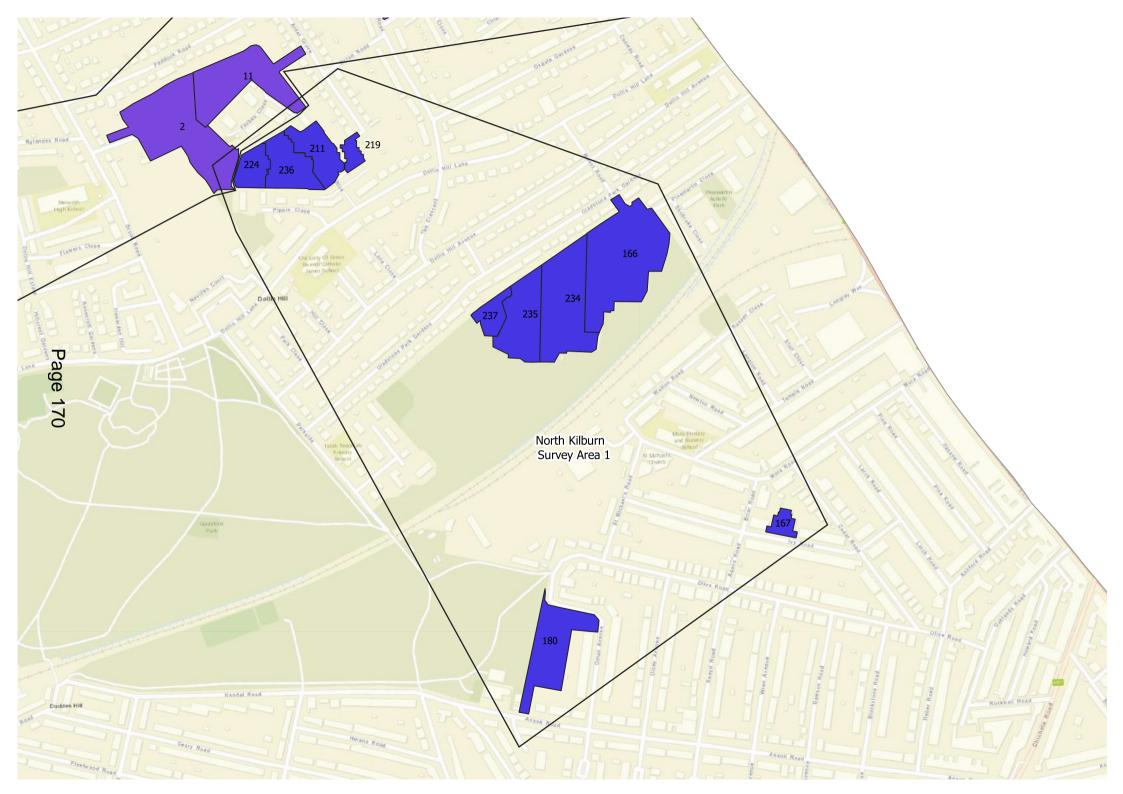
South Kilburn Survey Area 3

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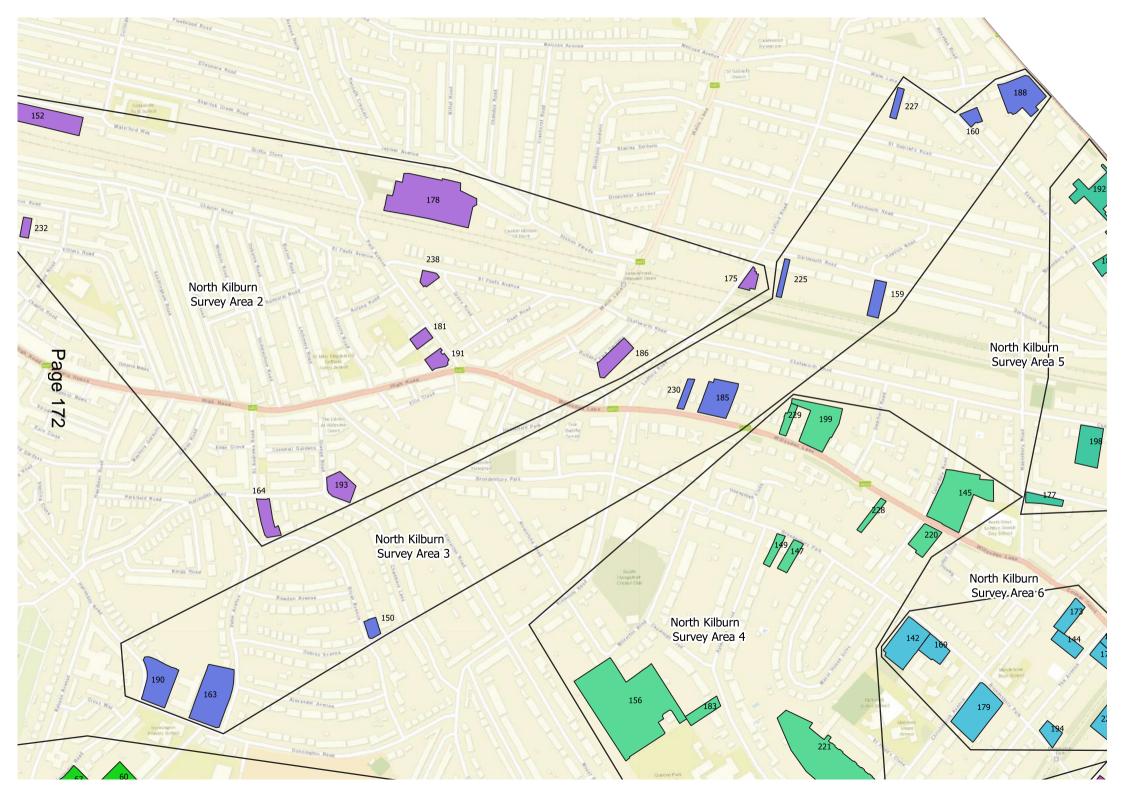


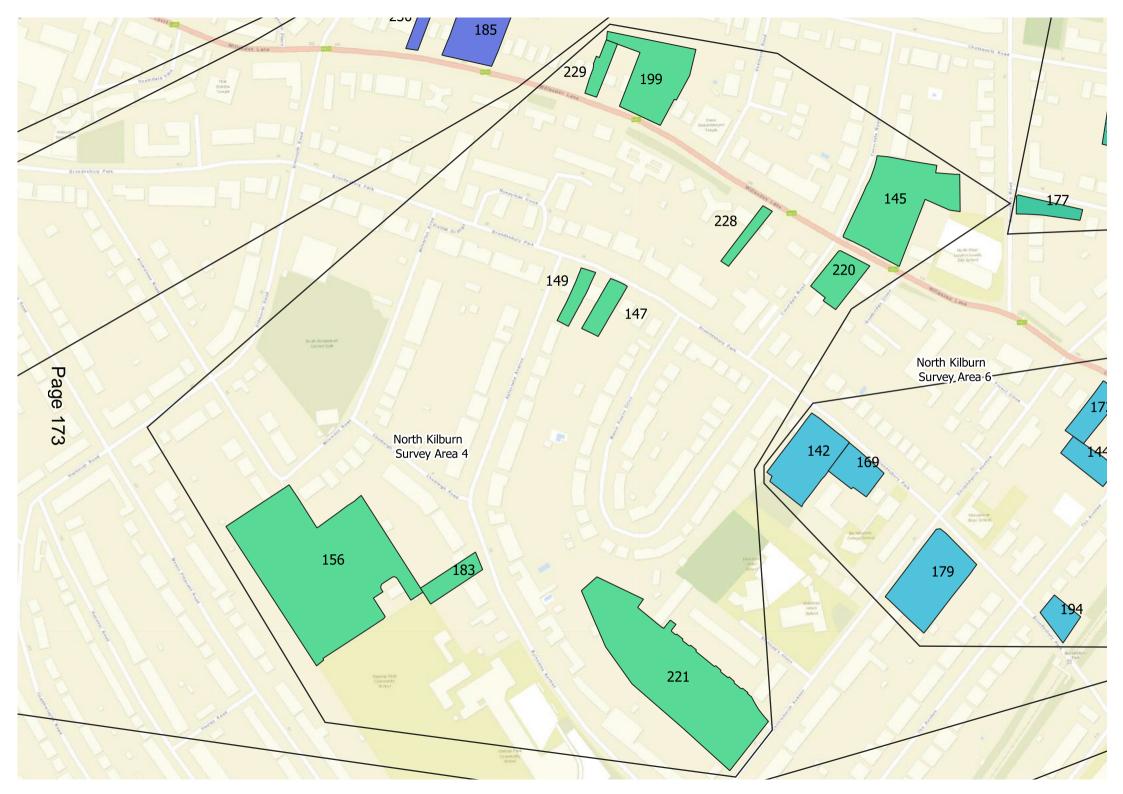


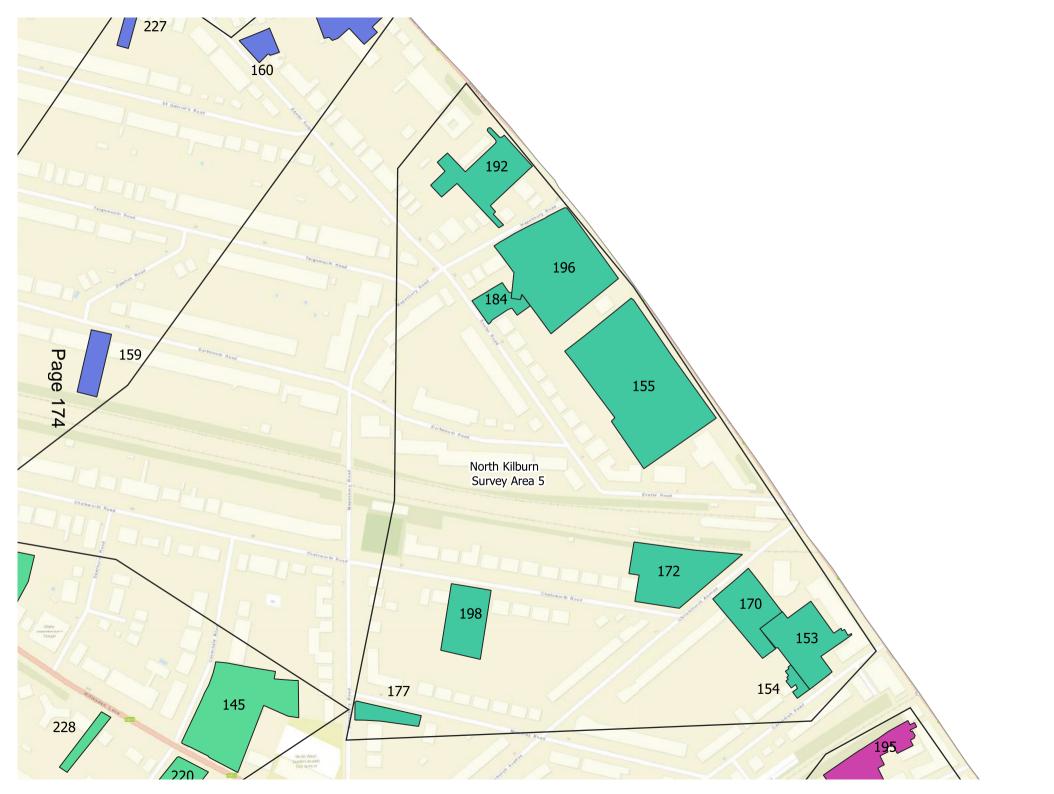


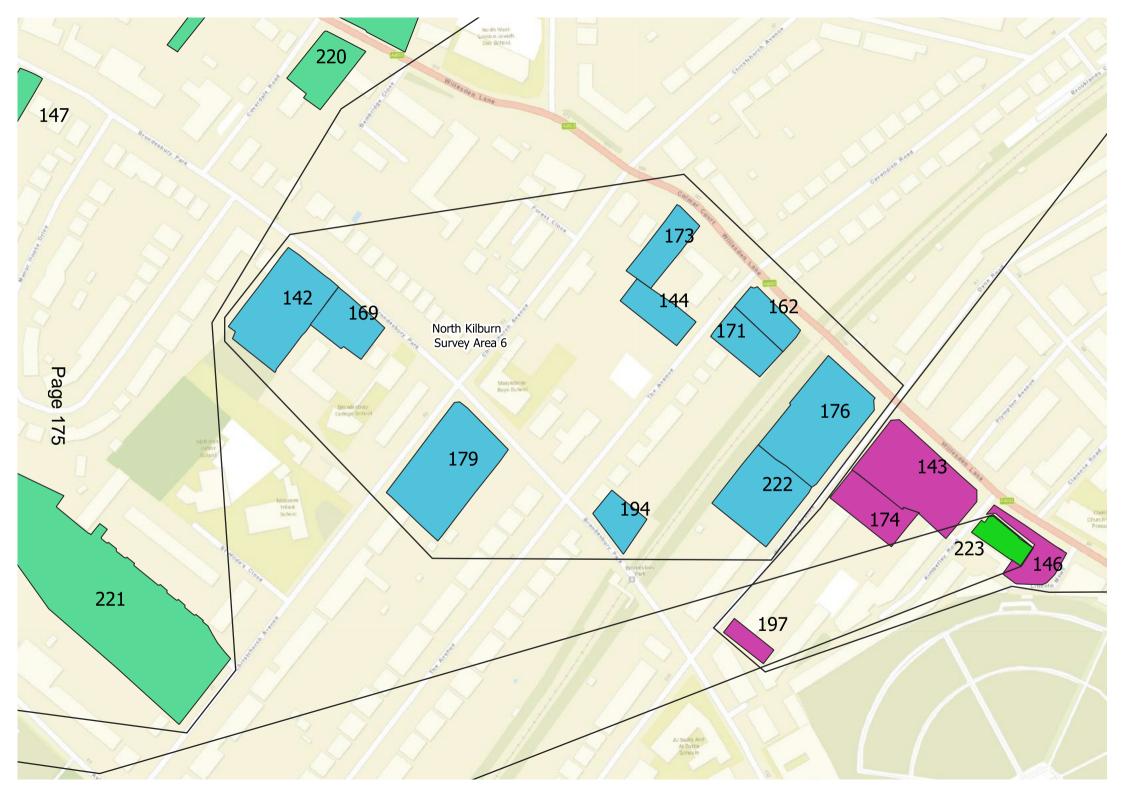


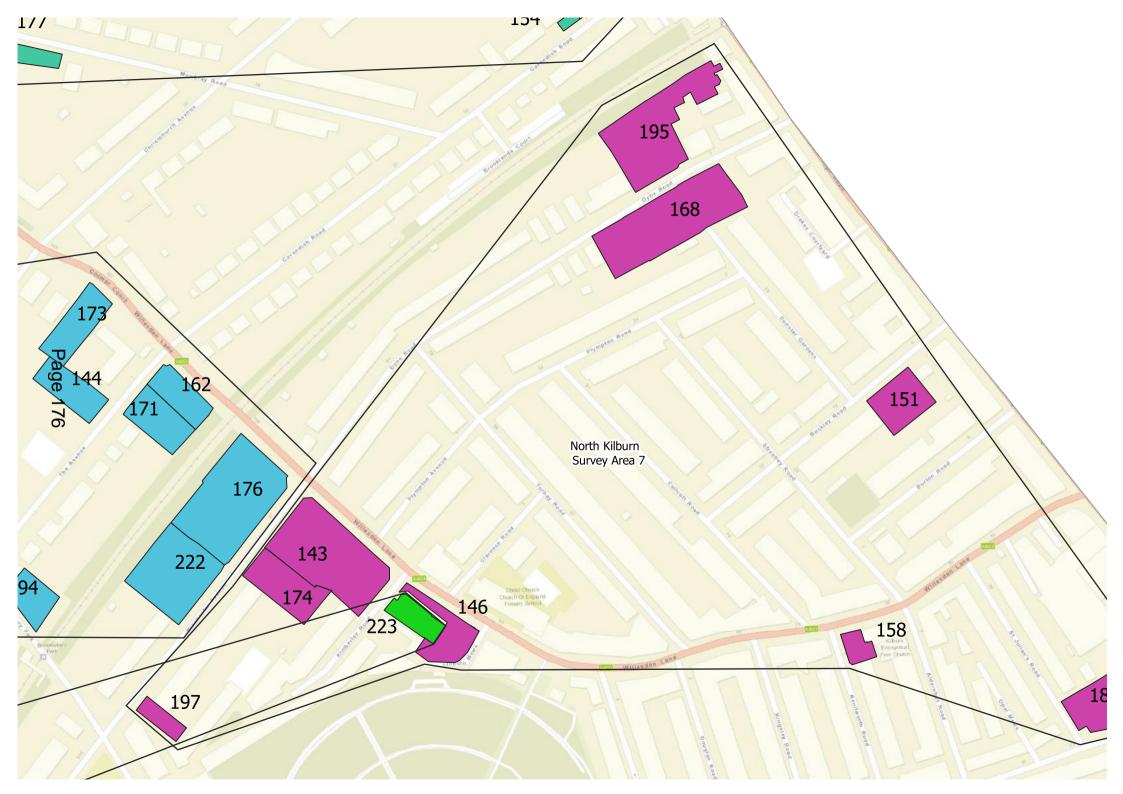


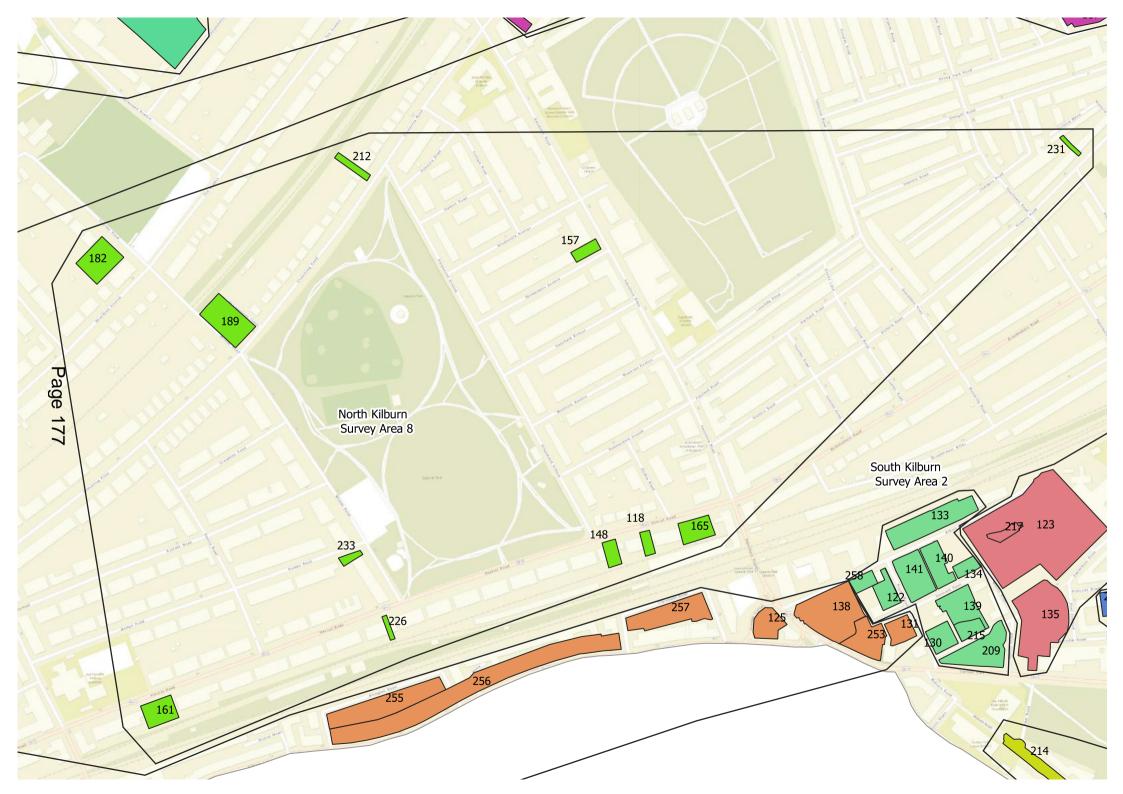




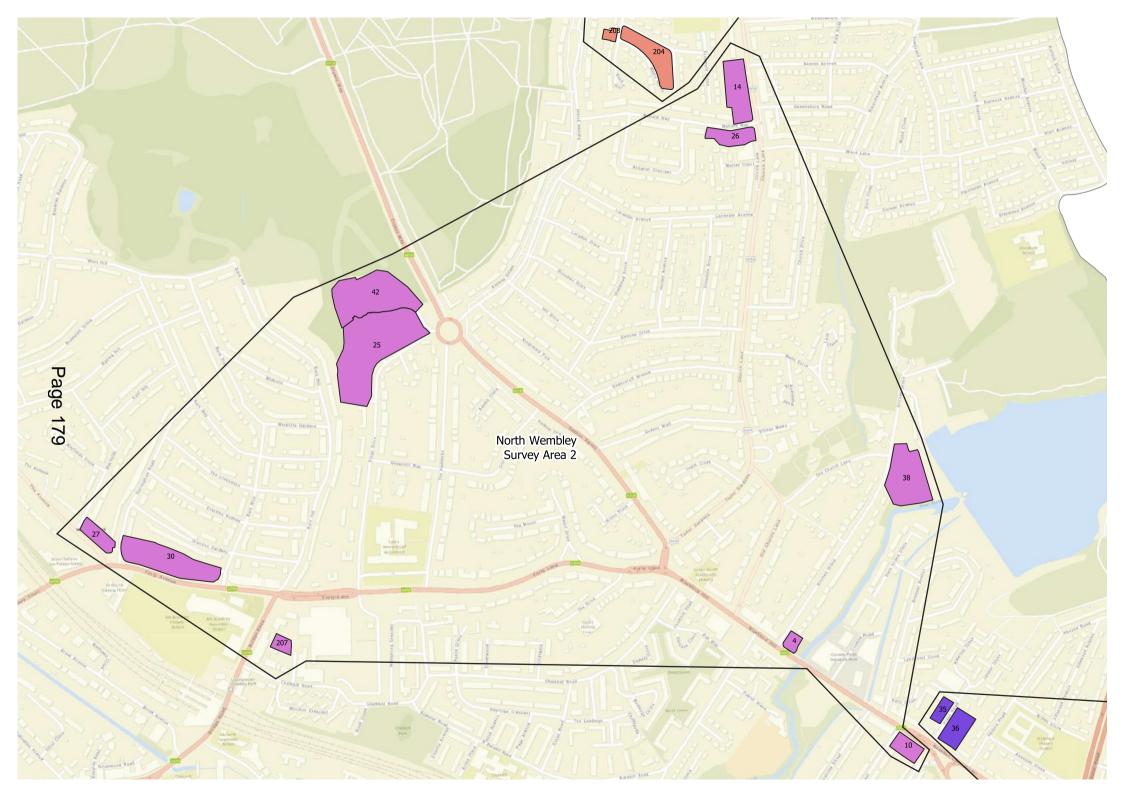


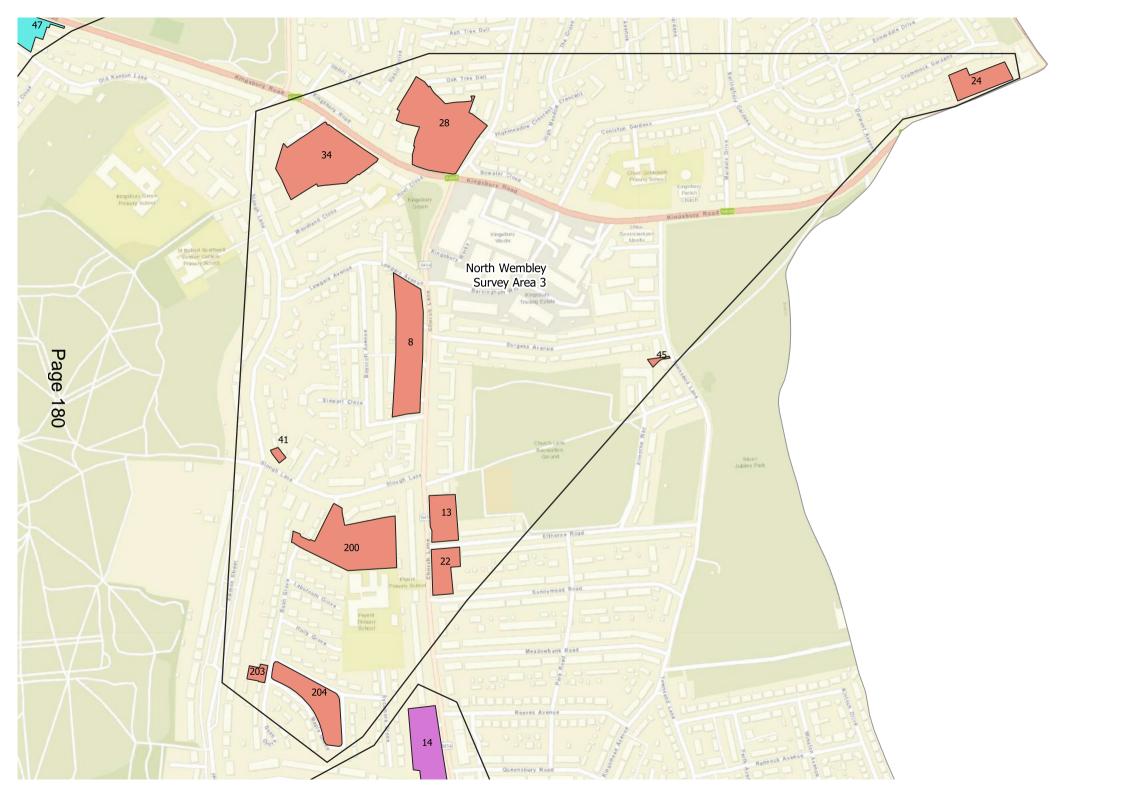


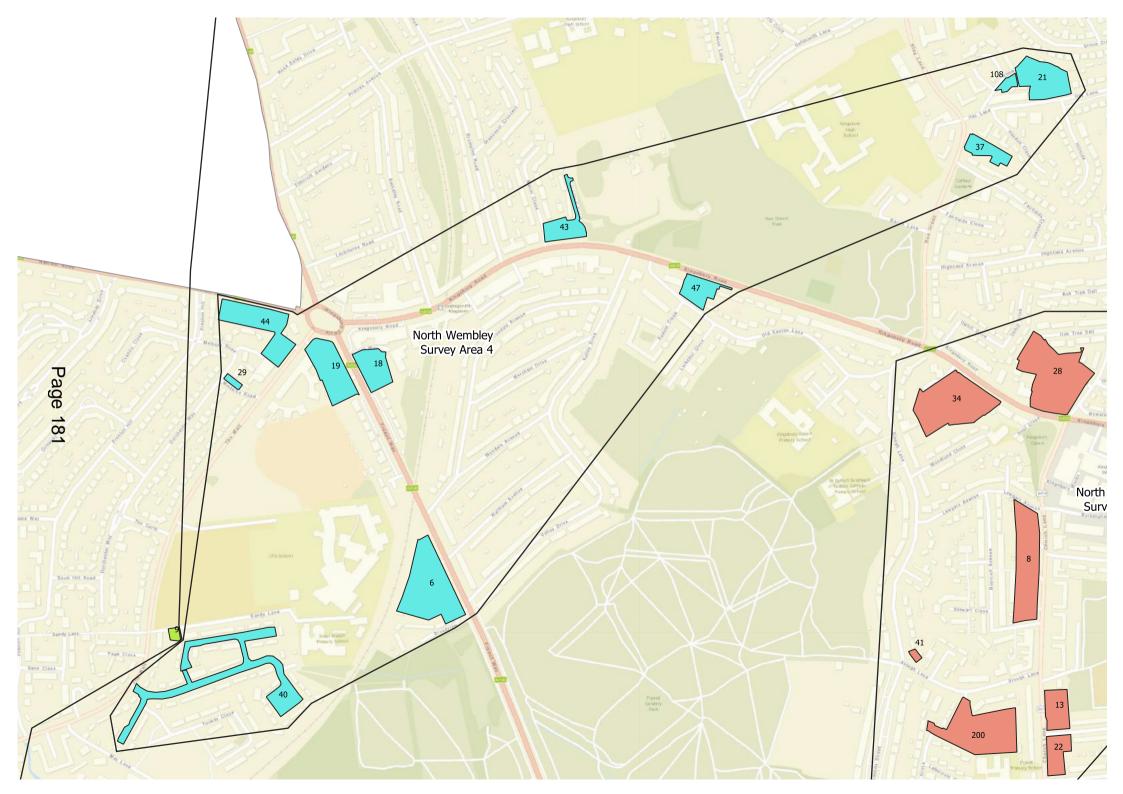


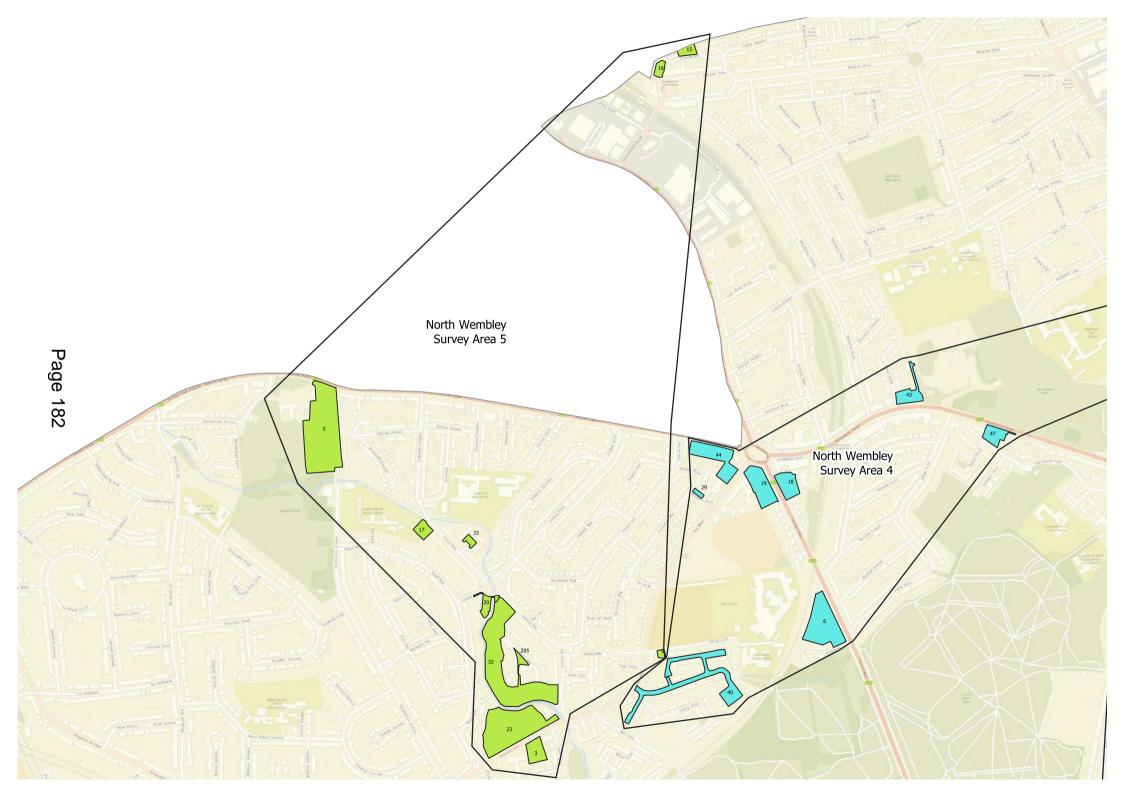




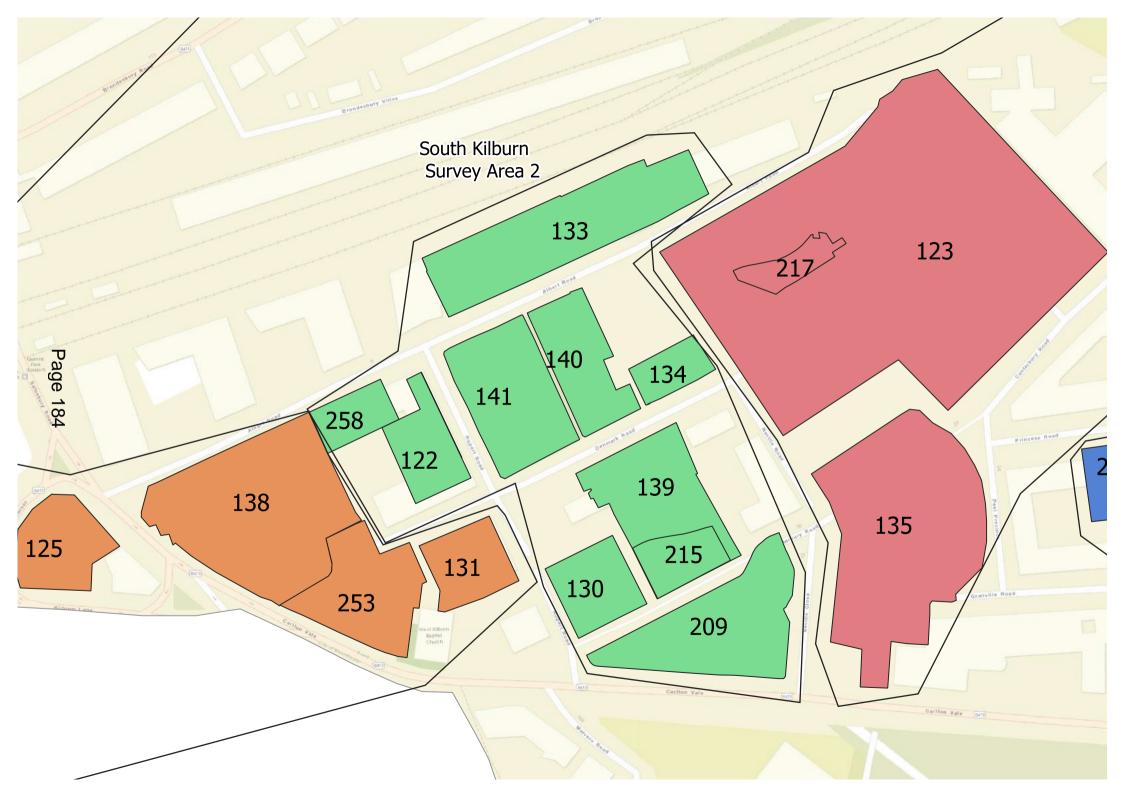






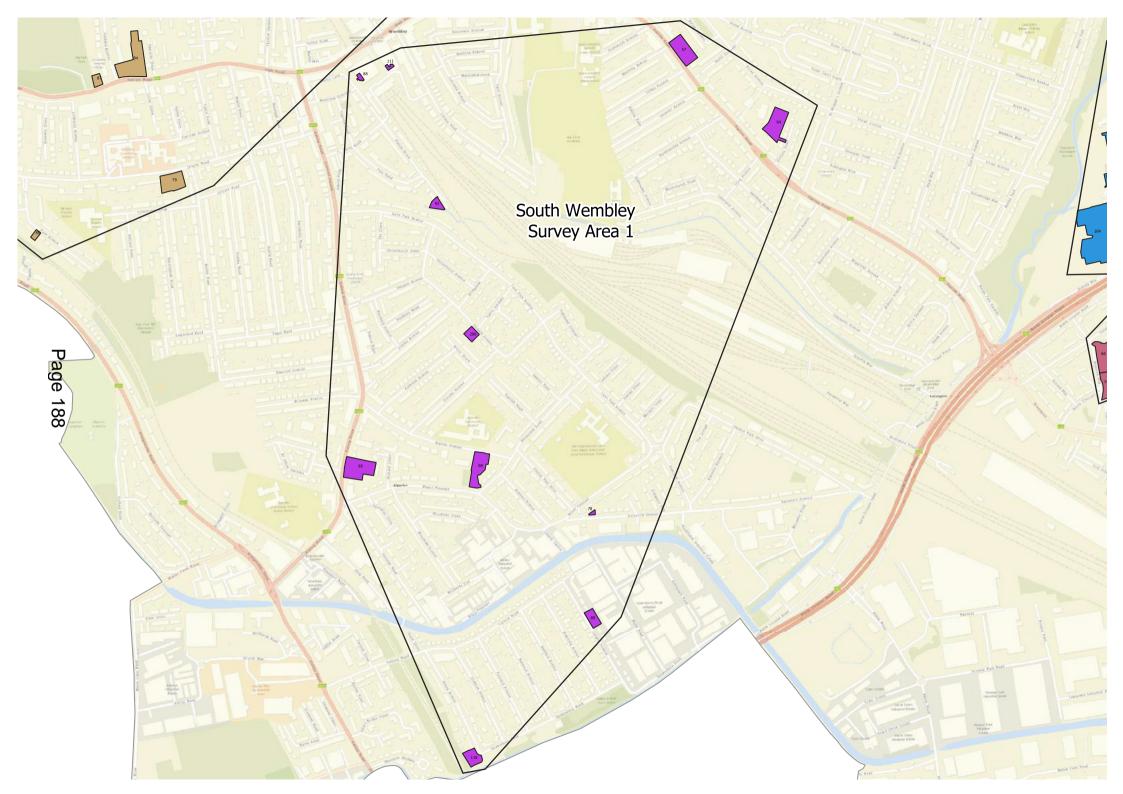


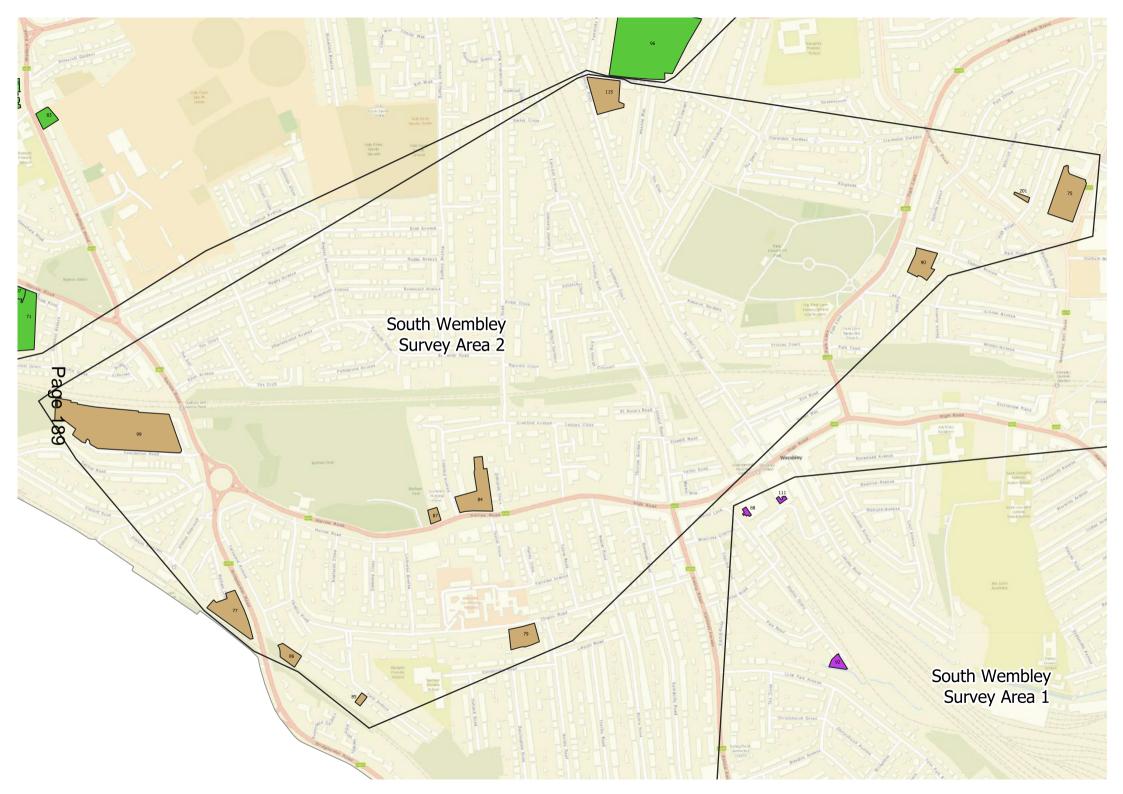


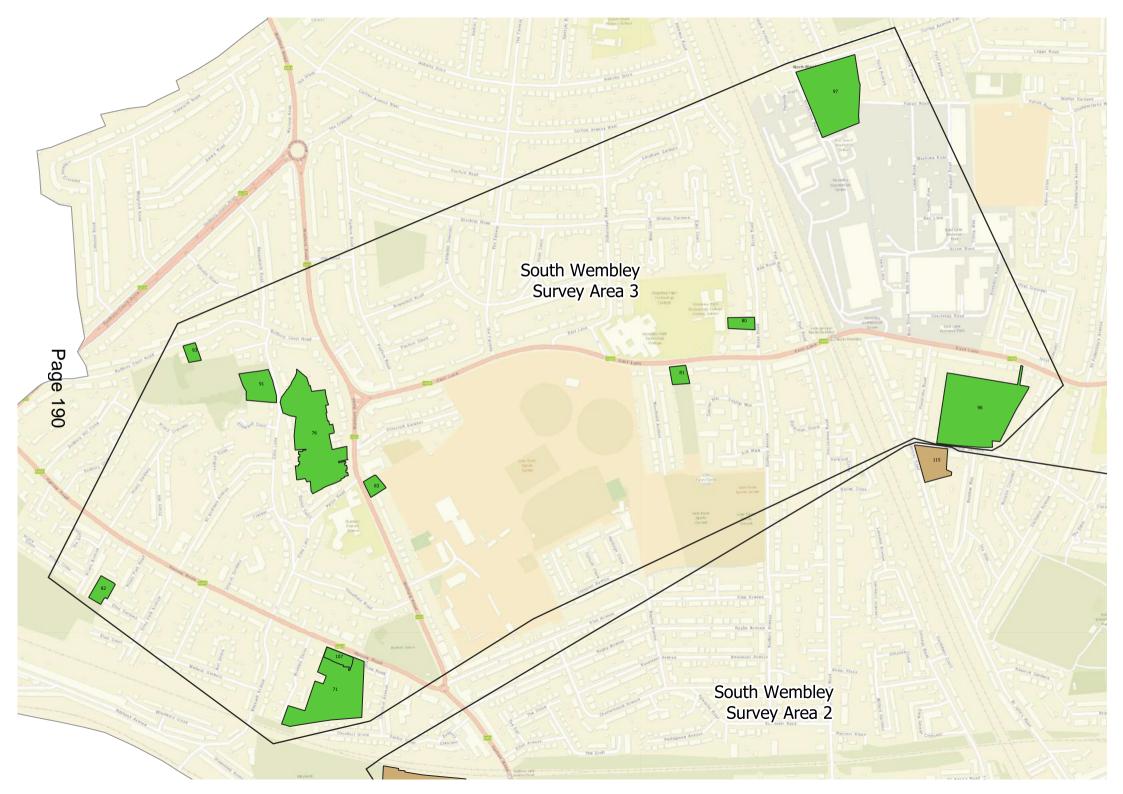






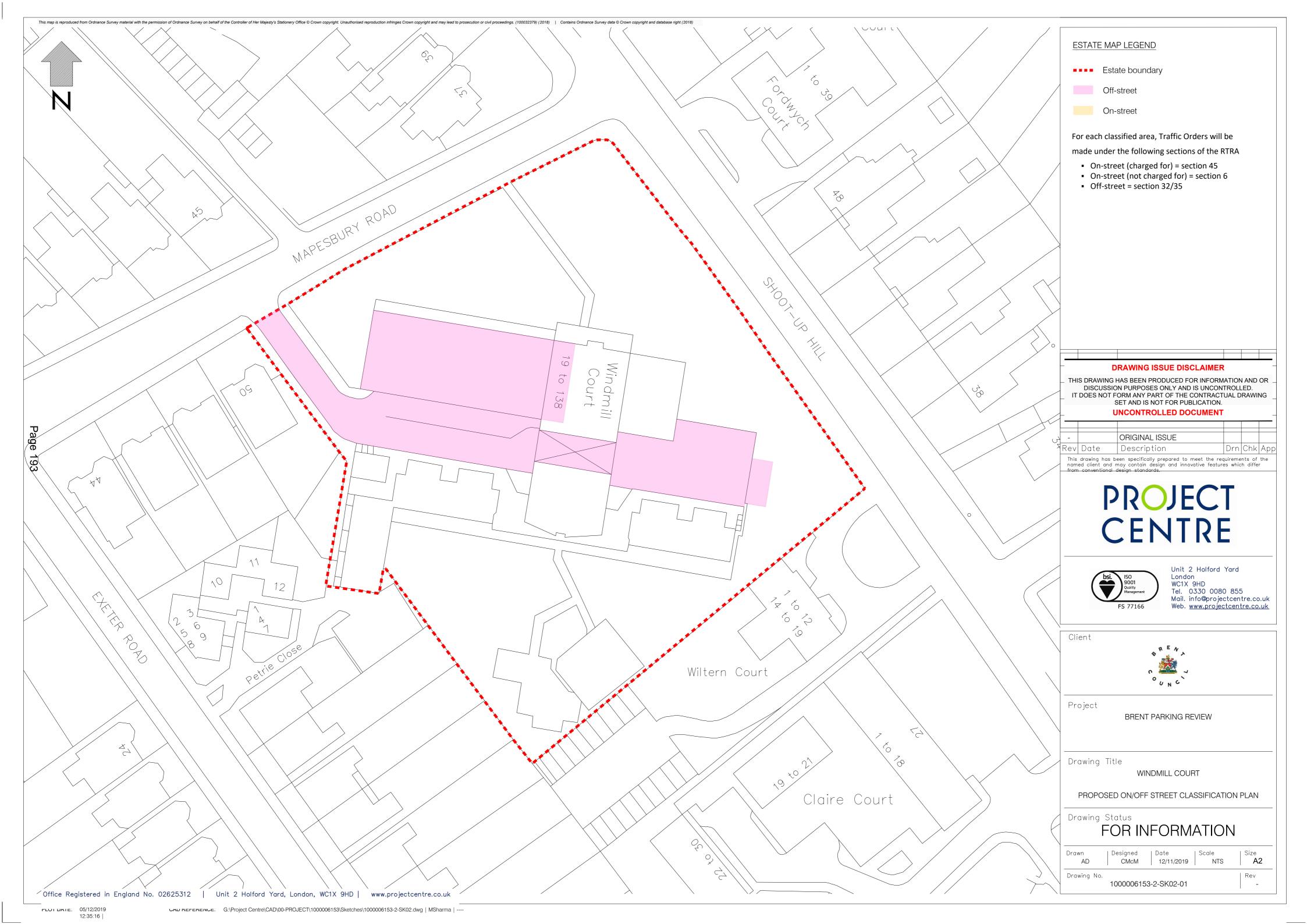


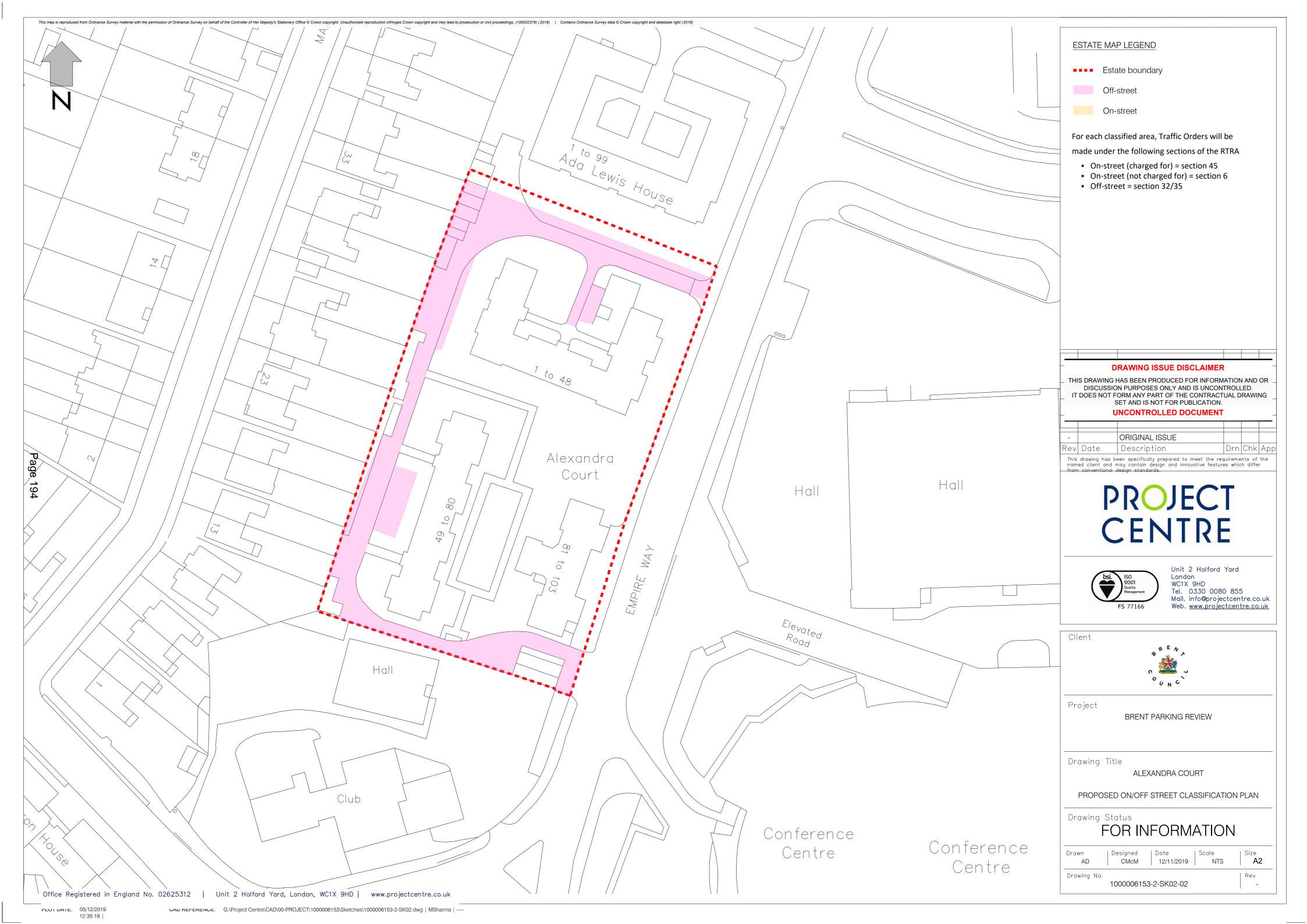


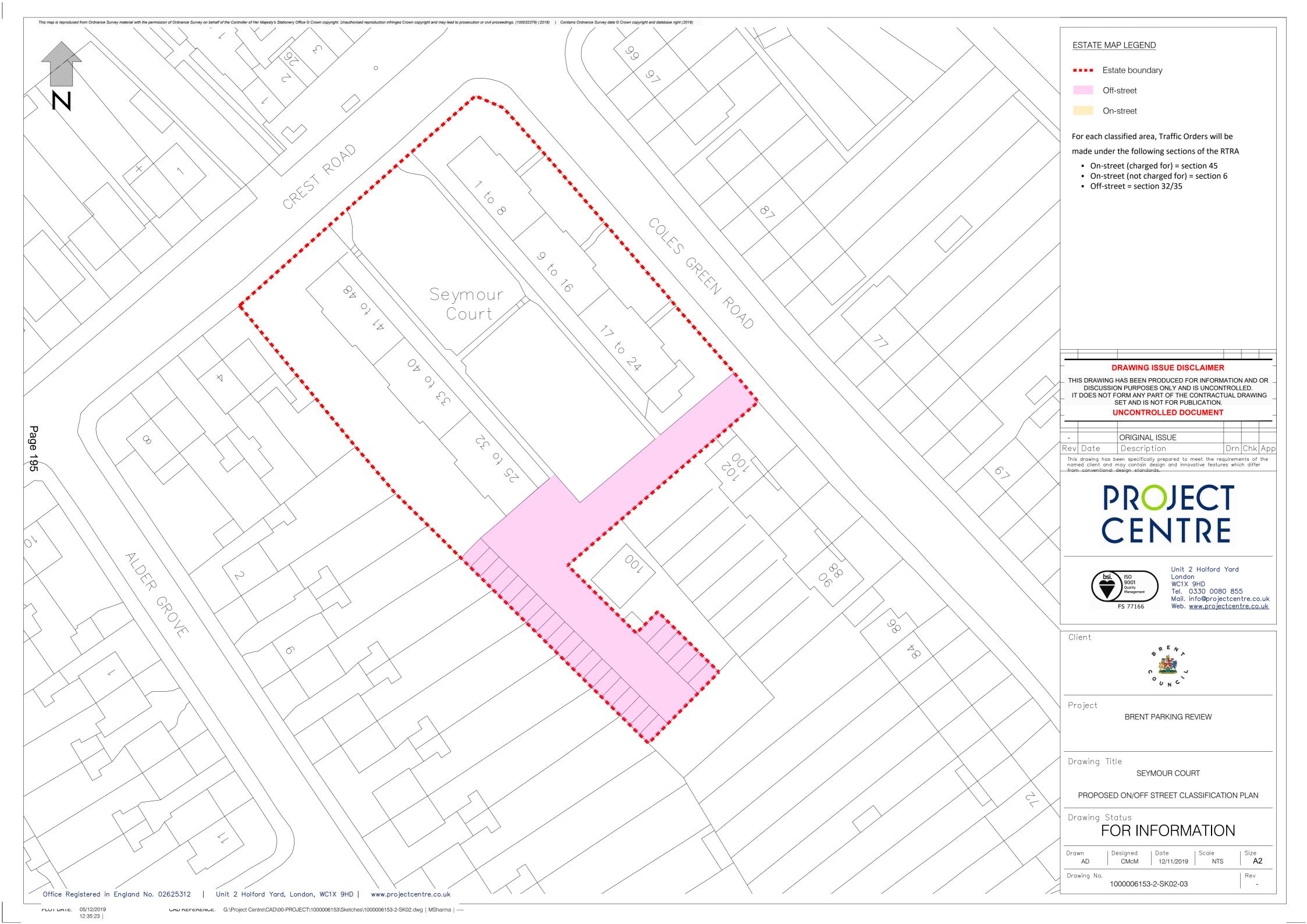


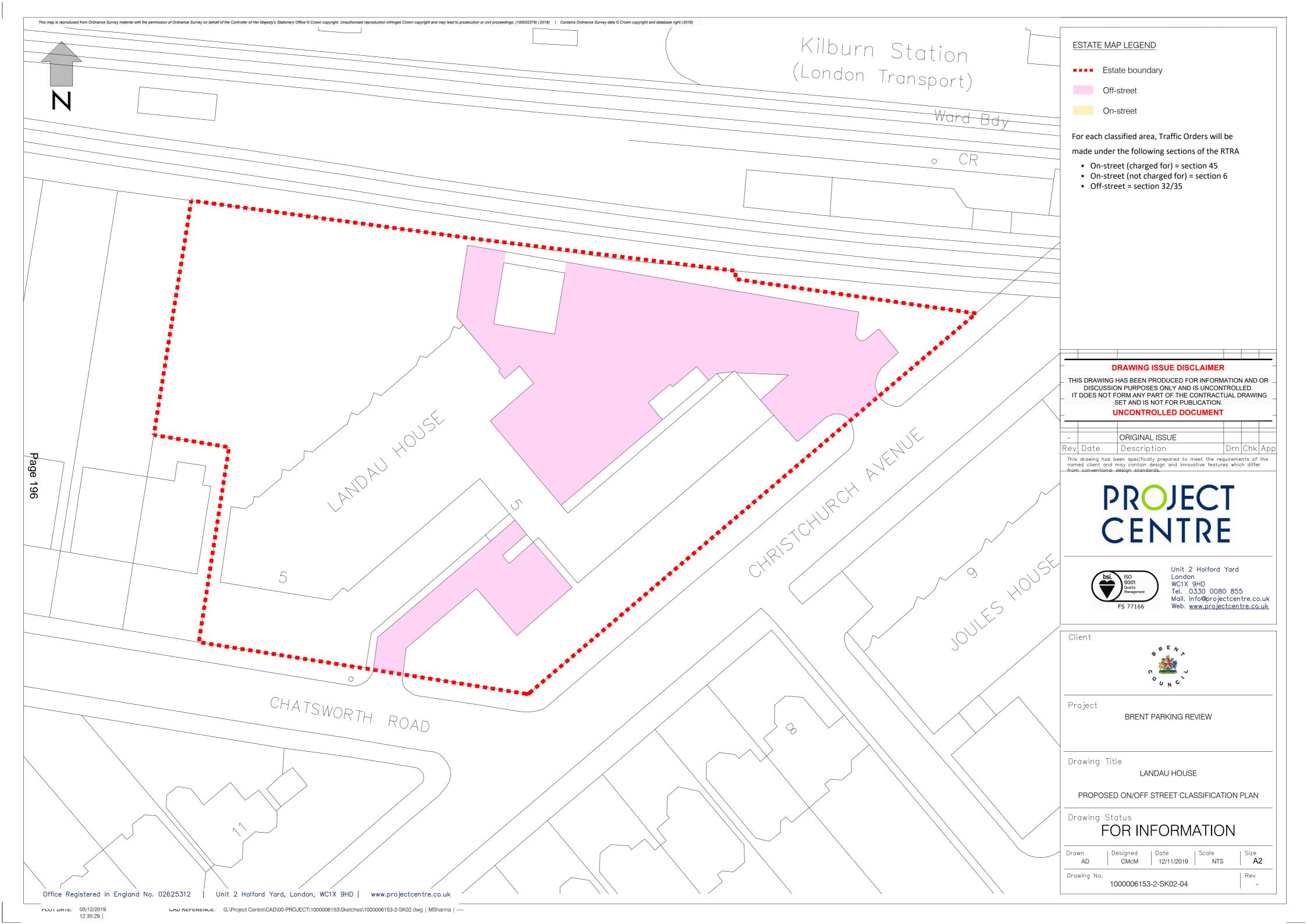


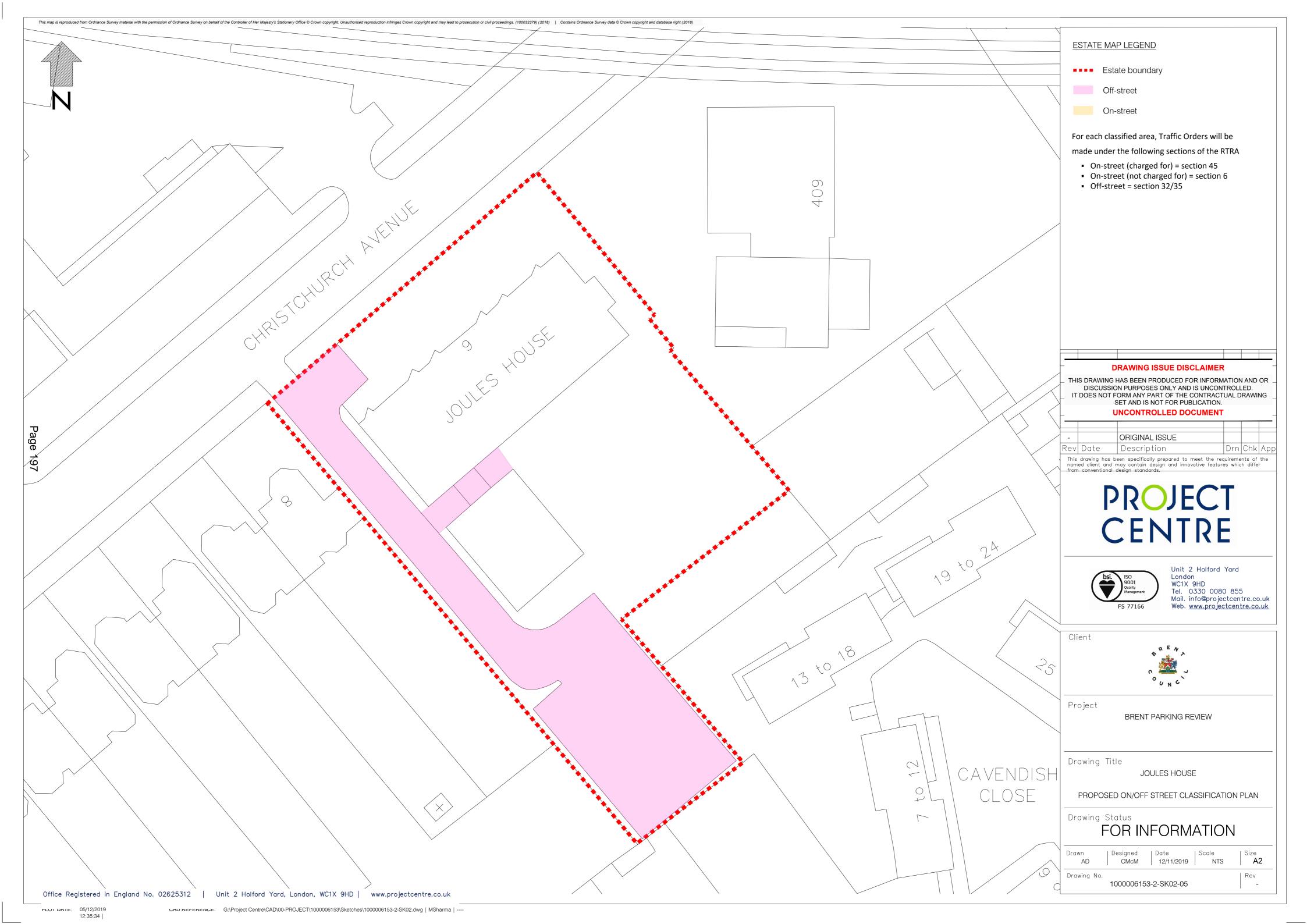
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Appendix III Estate Parking project Phases

Site survey Technical note to accompany: Existing inventory plan Phase A1 •On / off street classification plan Existing, live project Survey •Technical note to accompany: ·Initial design plan (for consultation) ·Signs and lines plan and schedule Phase A2 Bill of quantities •Identification of road surface problems that may affect white/yellow lining Design User-friendly consultation plans •Leaflet / questionnaire / FAQs PCLConsult webpage Handle all correspodence and public exhibitions Phase B Report Consultation •Text or map based traffic orders New parent traffic order(s) ·Map schedule plans (if required), notices & statement of reasons Phase C · Publish notices and handle statutory consultation Report of objections Traffic Orders Out of scope · Enforcement and back office system arrangments made with Parking Construction plans for contractor Updated bill of quantities Phase D •Site supervsion of contractor, snagging and sign-off Implementation

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Cabinet 20 July 2020

Report from Strategic Director, Community Well Being

New Council Homes Programme

Wards Affected:	Programme Update – All Wards		
Key or Non-Key Decision:	Key Decision		
Open or Part/Fully Exempt:	Open		
No. of Appendices:	Appendix 1: Individual Progress on Sites		
Background Papers:	None		
Contact Officer(s):	John Magness Head of Housing Supply & Partnerships john.magness@brent.gov.uk Tel: 020 8937 3272 Akin Adenubi Development Manager akin.adenubi@brent.gov.uk Tel: 020 8937 2518		

1.0 Purpose of the Report

- 1.1 This report provides an update on progress made towards delivering against the Council's housing target of 5,000 new affordable homes over the five year period (2019 2024), 1,000 of which will be through the New Council Homes Programme (NCHP).
- 1.2 In December 2019, it was agreed that Cabinet would receive six monthly reports updating progress since the previous meeting and outlining key decisions required enabling the programme to continue until the next meeting six months hence. This report provides information on the progress in respect of procurement decisions made at Cabinet in December 2019 and the next stages in the development programme.
- 1.3 This report also provides a summary of the additional developments being assessed and progressed, with an indication of key issues, practical considerations and steps being taken moving forward.

2.0 Recommendation(s)

- 2.1 Cabinet is asked to:
- 2.1.1 Note the contents of this report and progress to date in delivering both the New Council Homes Programme (NCHP) and other programmes and projects in place to deliver a total of 5,000 new affordable homes in the borough by 2024.
- 2.1.2 Note the steps being taken as set out principally in Sections 6 and 7 to add value to the programme, specifically in relation to stakeholder engagement and landscaping.

3.0 Introduction

- 3.1 Delivering 5,000 genuinely affordable homes within a five year period is an ambitious target. However, the Council has built and continues to build the necessary delivery infrastructure and relationships, to achieve the target. The Council recognises the importance of Registered Providers (RPs) in achieving this target and deliberately built a team to harness and support efforts by RPs to develop affordable homes in the borough. Where the Council has direct control, i.e. in the direct delivery of 1,000 Council homes, all relevant departments and teams within the Council structure, such as Property, Procurement, Planning, Legal, Finance, along with Housing, are working extremely well together to ensure delivery.
- 3.2 Below is the current delivery position under the New Council Homes Programme:
 - 146 new homes have been built and let
 - 694 homes are on site
 - 162 have been given planning consent and now going through procurement for developers
 - 255 have been submitted for planning consent
- 3.3 A further 19 sites are currently going through design and feasibility. The number of homes to be achieved from these sites are currently estimated to be c.140 and they are geared towards larger sized family homes. In addition, officers continue to explore new sites to be added to the pipeline, for future delivery.

4.0 Background

- 4.1 Strategic Housing Target
- 4.2 The Council has committed to an ambitious strategic housing target to deliver 5,000 new affordable homes over the five year period 2019- 2024. Delivery of a total of 5,000 new affordable homes includes the provision of 1,000 directly by the Council by the 31st March 2024.
- 4.3 There are several mechanisms through which the Council aims to meet this target including, but not limited to:

- Delivering new homes directly through the Council (utilising infill sites, mixed development sites and new pipeline sites).
- Working with Registered Providers (RPs) to encourage development funded by GLA grant and cross-subsidy.
- Utilising planning policy and process to specify the development of affordable housing through Section 106 obligations.
- Providing new homes through major developments led by i4B, the Council's Wholly Owned Investment Company and First Wave Housing (FWH), a Council owned Registered Provider, limited by guarantee.
- Exploring opportunities to redevelop and regenerate existing housing stock and public realm, to provide new housing, with partners where necessary.
- Acquisition of property and land from the open market and the reprovision of affordable housing through investment in capital improvement works.
- 4.5 The table below (Table 3.1.3) sets out the projected number of new homes based on known development sites and opportunities identified to date as at April 2020. This includes sites flagged by the GLA as being s106 sites, which have the benefit of grant.

Table 4.6

Financial Year	Affordable Rent	Shared Ownership	TA	s106	DLP	SSU	Nail	Total
2018/19	270	33				48		351
2019/20	211	104		79				394
2020/21	606	642		119	12			1,379
2021/22	488	308	92				57	945
2022/23	502	912					61	1475
2023/24	362	130		121			115	728
Total	2,409	2,129	92	319	12		233	5,272

DLP: Developer Led Project

SSU: Supported Specialised Units (Supported Accommodation delivered by an RP)

- 4.7 It is important to note that the viability of individual development sites and opportunities continue to be assessed in line with each provider's (including the Council) policies and procedures, as progress is made, scheme by scheme. As a consequence, on occasion sites may fall out of the programme and be replaced by others. This is a natural element of a dynamic development programme.
- 4.8 The Council's Housing Supply and Partnerships team is responsible for facilitating this agenda and does so by;

- Working with colleagues in Housing Needs to identify current and future housing demand.
- Identifying new development opportunities on existing Council owned land and new sites and ensuring these are designed to meet the above demand whilst remaining financially viable.
- Advising partner Registered Providers of gaps in supply and the most beneficial development and property sizes to meet this demand.
- Assisting Registered Providers to maximise the amount of affordable housing they are able to provide on each of their developments.
- Being aware of new private developments and the proposals for Affordable Housing and working with Planning colleagues to maximise the amount.
- Working with the GLA to identify potential opportunities and funding streams to facilitate the increased delivery of Affordable Housing in the Borough.

5.0 NCHP Progress to Date

5.1 In December 2019, Cabinet agreed the procurement of building contractors for the development of five sites with values exceeding £5m. Updates on each of the sites are as follows:

5.1.1 **Dudden Hill Community Centre**

This site will provide 29 new homes and a new community centre. Planning permission has now been granted and the start of the construction process is subject to agreement on Heads of Terms for a new Lease and a Deed of Surrender for the Brent Indian Community Centre's existing Lease. The Council will appoint Willmott Dixon via the SCAPE Framework to build out this scheme once terms are agreed and an acceptable alternative premise found. It is currently anticipated that Start on Site will be October 2020.

5.1.2 Honeypot Lane

Planning consent has been granted for 61 homes providing extra care supports. The Contract Award letter has been issued and signed by all parties. United Living, the appointed Contractor, signed the Build Contract on the 29th June 2020. Following the signing of the Contract a 'Kick Start meeting was held on site on the 1st July 2020. United Living are due to take official handover of the site on the 17th August 2020. Practical completion is currently 6th June 2022. The GLA Grant allocated to the site totalling £6.5m has been drawn down.

5.1.3 London Road

The Council is still awaiting formal planning permission from the GLA for 170 new homes to be built. This includes 92 general needs homes, 25 self-contained assisted living flats and 53 homes for temporary accommodation. This project requires Section 77 consent from the Secretary of State (Education) and Council officers across various departments are currently working on responding to questions raised by the Department of Education in order to proceed. There is a

strong possibility that we may not be able to build out these new homes due to the issues surrounding the S77 consent.

5.1.4 Learie Constantine

This site will provide 26 new homes and a new community centre. Planning permission has now been granted and the start of the construction process is subject to agreement on Heads of Terms for a new lease and a Deed of Surrender for the Centre's existing lease. The Council will appoint Willmott Dixon via the SCAPE Framework to build out this scheme once terms are agreed and an acceptable alternative premise found. With the delays caused by the Community Group it is currently anticipated that Start on Site will be March 2021.

5.1.5 Stonebridge - Milton, Hillside and Twybridge

Milton and Hillside will provide a total of 73 homes. The award letter has now been signed by the appointed contractor, Higgins Construction. Whilst we await the signing of the Build Contract enabling works have been undertaken and completed. Works included the felling of trees and clearing the future area for the proposed site compound. Works started week beginning 27th April and have now ended. All GLA grant allocated to this phase of the scheme has been drawn down

The Twybridge site, which will provide 67 homes, continues to be delayed by Section 77 consent from the Secretary of State (Education). Council officers across various departments are working on responding to questions raised by the Department of Education in order to proceed. Whilst the S77 issue is being resolved the site will be used as a decant facility for the Education facilities currently located at Moreland Gardens.

5.2 Cabinet also noted the intention to develop five further sites that did not require formal Cabinet approval and the progress is shown below.

5.2.1 Preston Road Annex

12 homes and a new community library. A local resident has challenged the Planning Permission decision via the Judicial Review process. A 'without prejudice' meeting is being arranged between the Council, the local resident and the local resident's architectural advisor, to undertake an independent assessment of the scheme and agree options for a way forward. It is currently anticipated that Start on Site will be December 2020.

5.2.3 Clock Cottage

The Council has been engaging the neighbouring hospice to update the scheme proposals and subsequently a non-material amendment planning application will be submitted to provide 13 self-contained assisted living flats. Subject to a revised planning permission being granted, the Council will then appoint a suitable a contractor to build out the scheme.

5.2.4 Frontenac, Gloucester Close, Mason Court, Kings Drive and Hindhurst

The 5 schemes with a total of 29 homes, were parcelled up into two lots, one lot being Frontenac and Gloucester and the other Mason Court, Kings Drive and Hindhurst, to provide scale to the build works. Preferred bidders for both lots have now been identified and the process of issuing Award letters has now

commenced ahead of the signing of the actual Build Contracts. Enabling works have been undertaken and GLA grant drawn down where applicable.

5.3 NCHP – Progress towards the target

5.3.1 A total of 146 new Council homes have been delivered to date

Table 4.4.1

Financial Year	General Needs	NAIL	Total
17/18	5	0	5
18/19	30	69	99
19/20	15	19	34
Total	50	88	138

5.3.2 Property numbers that are on site or proposed and due to be completed in the financial years up to and including 23/24 are shown in table 4.4.2.

Table 4.4.2

Financial Year	General Needs	Shared Ownership	Nail	Temporary Accommod ation	Total
20/21	116	0	0	0	116
21/22	281	0	57	92	430
22/23	153	0	61	0	214
23/24	237	22	115	0	374
Total	787	22	233	92	1134

5.3.3 In addition to the completions and sites in progress above there are a number of new sites where planning permission is being sought shown in table 4.4.3

Table 4.4.3

Scheme	Number of Properties
Anuerin Bevan Court	9
Pharamond	10
London Rd	170
Moreland Gardens	65
Sycamore Grove	1
	255

5.4 St Raphael's Estate

The Council has set up a dedicated project to develop proposals to build new Council homes and make improvements to St Raphael's Estate working with a constituted residents group. An architect firm Karakusevic Carson Architects has been appointed to co-design the proposals with residents, supported by independent advisors PPCR. To date over 80% of all households have been engaged in the process, through a series of public events, workshops, drop-ins and individual conversations.

Two approaches are being considered;

- Redevelopment, taking the place making approach adopted in South Kilburn. Residents were presented with three outline proposals and this has been refined into an outline proposal, which is now being modelled financially. The proposal could deliver over 2000 new homes, the rehousing of 507 tenants with the option to provide new homes for 252 leaseholders/freeholders and up to 550 additional affordable rented homes.
- Infill+, which whilst not comprehensive to the same extent as redevelopment aims to respond to some of the underlying issues in the area and consider how existing properties and the environment can be improved while delivering new homes. The proposal could deliver over 350 additional homes, providing the opportunity to rehouse residents who are over-crowded plus the provision of net additional c300 affordable homes. The current proposal includes improved community facilities, landscaping and a refurbished retail offer with additional residential refurbishment being considered.

5.5 Grand Union

Cabinet has agreed the acquisition of 114 new homes being delivered by St Georges Ltd (Berkeley Group) at the Grand Union site in Alperton as part of their s106 planning obligation. This tranche consists of 92 rented homes due for practical completion and handover in November 2022 and 23 shared ownership homes due in May 2024. The Council will be using its Right to Buy (RtB) Receipts to part fund the purchase enabling the rented homes to be let at London Affordable Rent.

5.6 South Kilburn Regeneration

The Council is one of the most ambitious London Boroughs when considering the development of its own new housing since the introduction of greater levels of grant and the removal of the HRA borrowing cap. This has led to more detailed discussions with colleagues regarding the potential to become more actively involved as a delivery partner in South Kilburn. The Council has already signalled its ambition by purchasing 233 homes from Telford Homes and Notting Hill Genesis at the Gloucester & Durham site and in so doing increased the amount of affordable rented homes by 57% in addition to the original proposal.

5.6.1 Officers are now exploring various opportunities in SK to deliver Council homes, but still ensuring a good balance between social and privately owned housing, as required in the Master Plan. Three sites under consideration have the potential to produce 274 new Council homes.

- 5.6.2 There are potential opportunities at the following sites that will increase the overall delivery;
 - Queens Park/Cullen House 53 homes
 - William Dunbar/William Saville 201 homes
 - Granville Open Space 20 homes

5.7 Partnership with Network Homes to deliver new homes let at London Affordable Rent in Church End

In addition to directly delivering one of the largest programmes in London the Council is also working in partnership with Registered Providers (Housing Associations) with the aim of maximising the number of affordable homes delivered. An example of this is a site at Church End where the Council have assembled 2 sites and obtained planning permission for 99 homes. The original planning consent provides for 34 rented homes and 65 Shared ownership units. The Council is working with Network with the objective of maximising the number of homes let at LAR. The current proposal is for the Council to transfer the land at a peppercorn value and in return Network will deliver 99 homes let at LAR. The GLA have been asked to support the scheme with an enhanced grant rate of £105,000 per homes. The Council will have 100% nomination rights into the homes.

5.8 New Accommodation for Independent Living (NAIL) Programme

The NAIL Programme is a major cross-council strategic initiative to provide high quality accommodation for a range of people who need assisted living. This accommodation offers a viable alternative to residential care for people with high support needs, through providing schemes which promote wellbeing and the ability to live independently through good design.

- 5.8.1 By separating accommodation from care & support costs, the NAIL Programme delivers significant efficiency savings for Adult Social Care (ASC) budgets, making it the largest savings programme within the Council. However, the motivation behind the programme is not purely financial. There is a clear evidence base that supporting the most vulnerable adults in Brent to maintain their independence, receive the care and support they need and continue to live in their own communities is the right thing to do
- 5.8.2 £5.3m savings have been delivered through the provision of 306 units, across 24 schemes. £1.8m will be delivered in 2020/21 through full occupancy of schemes with voids, and completion and fill of new schemes coming on line this year.
- 5.8.3 Extensive work has been undertaken to model and predict future demand for NAIL properties. Demographic information has been combined with existing service user information to create a projected demand profile for future NAIL schemes. The NAIL team worked with finance and performance staff to assess the current location of existing service users and to profile this against their ideal location

- 5.8.4 Phases 1 and 2 of the NAIL programme have previously been approved by Cabinet in 2014 and 2017 respectively. Phase 3 of NAIL concentrates on immediate need, i.e. individuals that have been already identified as suitable for NAIL and are currently known to ASC. Phase 4, using Demand Modelling, suggests that in order to manage demographic pressures in the future, c. 100 units of (Extra Care Supported Housing (ECSH) will be required every 5 years in Brent. This modelling is based on both the increasing number of older people in Brent, evidence suggesting that older people will live longer with multiple health conditions and the desire to open ECSH provision to a wider cohort of older people with less substantial needs.
- 5.8.8 It will be necessary to consider the impact of COVID-19 and whether this will change the demand for Extra Care accommodation with concern regarding Care Homes making NAIL more attractive.
- 5.8.9 The overall NAIL programme is shown in Table 4.3.2 above.

5.9 Landscape Programme

- 5.8.1 Residents have told us that one of the most important things to them is the look and feel of their estates, the 'kerb appeal'. As such, the previous Cabinet paper described the approach to improving the landscaped areas around developments to provide existing residents with enhanced communal garden areas. It has been a primary element of the programme so far that existing residents benefit wherever possible from the building works taking place in close proximity to their home.
- 5.9.2 The Housing Supply & Partnerships team has engaged a Landscape Architect to work with the Community Engagement Officer alongside existing communities to develop solutions which meet their needs. This will include consideration of location of bin areas, bike storage and dealing with rainwater run-off in ecologically positive ways.
- 5.9.3 Residents are involved in various engagement activities at the schemes shown in Table 6.1.3

Table 6.1.3

Council Led Projects in development, stage RIBA 1&2	Broadview Garages Eskdale Close Essoldo Way Gauntlett Close Moot Court Newland Court Westcroft Court Yates Court
Council Led Projects in development stage RIBA 3&4	Seymour Court Lidding Road
	Gladstone Park Anuerin Bevan Court
	Pharamond

	Stonebridge Milton/Hillside
	King's Drive
	Hindhurst Court
	Gloucester Road
	Mason Court
	Frontenac
	John Perrin Place
	Ellerslie Gardens
Council Led Projects in collaboration	Kilburn Sq
with Network Homes	Watling Gardens
	Windmill Ct

5.10 Aligning the NCHP to Planned Programmed Works

- 5.10.1 One of the promises to residents who have homes adjacent to proposed sites is that wherever possible, improvement works to their homes will be undertaken at the same time as new construction works. This will have a number of benefits;
 - Potential economies of scale
 - Uniformity of building elements for example window units
 - Minimising the time period over which residents are subjected to disruption

The Housing Supply and Partnerships team is working with the Property Services team to ensure that the long term Asset Management plan is considered when coordinating the timetable for the new build programme.

5.11 Engagement

- 5.11.1 Successful delivery of the development depends on a number of factors including; good governance, adequate resources, joint working across a number of teams across the Council and the engagement (and support) of residents and Members. The team are using a variety of mechanisms including public meetings, telephone conversations, newsletters, YouTube, Survey link etc. Wherever possible, ward Members will be asked to review newsletters and suggest additional content. The objective is to provide ward Members with sufficient information to be able to answer the key questions should they be approached by their constituents.
- 5.11.2 The Housing Supply and Partnerships team employs a dedicated Community Engagement Officer to facilitate the engagement process. The officer also provides Members with briefings outlining upcoming engagement events. Additional specialist resources are secured on an ad-hoc basis to support in relation to larger, more complex development sites.
 - The Hillside and Milton Avenue development aims to deliver 73 new homes and commercial space. 250 local residents, shops and business received a newsletter in March 2020 outlining the proposals. The ward Members preapproved the newsletter and provided additional comments. Following the Lockdown after works were initially suspended a further newsletter was prepared and members were consulted via MS Teams and telephone.

Treeworks commenced on site w/c 27th April 2020 after ward Members were briefed on the safety measures in place and how works would be dealt with on site. As part of this development existing residents will have new play areas and all of the trees removed to facilitate the works will be replaced.

- Engagement in respect of the Gladstone Park development commenced on the 4th May with a Member briefing via MS Teams.
- 5.11.3 Due to the ambitious nature of the NCHP, the Council recognises that residents will express concern or oppose the development of sites either directly to the Council or to ward Members for the following reasons:
 - Changes or disruption to surrounding green space.
 - New buildings reducing natural light into their homes.
 - Noise nuisance and other disruption e.g. access.
 - Loss of amenities such as car parking or garden areas.
 - Potential devaluation of privately owned properties.
- 5.11.4 The approach to Member and Stakeholder engagement can be summarised as follows:
 - <u>Stage 1: Inform Members</u> Cabinet Members will be provided with a full overview of all sites planned in the NCHP. Ward Members will be provided information about sites in their individual ward.
 - <u>Stage 2: Inform Residents</u> Residents whose homes will be impacted by a site will be written to and provided information on what the Council intends to build and how they can get involved.
 - <u>Stage 3: Design Phase</u> Residents and Members will be invited to a face to face consultation event. This event will showcase designs for the site and provide more information on the homes being built.

Residents will be asked for their feedback on the designs and any concerns they have which can be considered. This includes opportunities for wider community investment.

<u>Stage 4: Statutory Planning Consultation</u> – Our aim is to respond to residents' concerns throughout the design phase. Once detailed design and consultation is completed the site will be submitted for planning consent.

Planning will then start their statutory consultation. Residents will be written to and site notices will be displayed. This will include the statutory process for submitting any objections to the development.

<u>Stage 5: Building Phase</u> – Residents and Members will have the opportunity to meet the appointed contractor. Throughout this stage any complaints or comments can be reported to the dedicated email address newcouncilhomes@brent.gov.uk mailbox or by calling 020 8937 3355. Complaints can be directed to staff when they are on site periodically.

- <u>Stage 6: Community Investment and Aftercare</u> Once the homes have been completed, any opportunities for community investment, that were agreed in the design phase will be completed.
- 5.11.5 Planning policy and consultation requirements will be adhered to in respect of each site. The approach set out aims to assist elected members and residents in understanding the proposals in detail and how they might influence the design positively particularly in respect of the landscaped areas post completion.

6.0 Registered Providers (RPs)

6.1 Registered Providers continue to play a significant role in the delivery of new affordable homes in the Borough. Table 5.1 shows the new homes that are anticipated to be delivered over the next two financial years from RPs funded by the GLA.

Table 6.1

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Developer:	Financial Year 2020-21	Financial Year 2021-22	
Notting Hill Genesis	328	40	
Catalyst	76	66	
Network Homes	6	501	
Origin		5	
Octavia	90	185	
Home Group	178		
Clarion	111	715	
Metropolitan Thames	33		
Valley			
Hyde	178		
Innisfree	59	9	
Paragon Asra		80	
Peabody	198		
Riverside	7		
St. Mungos Community	6		
Total	1,270	1601	

- In addition to monitoring delivery and encouraging RPs to invest in specific sites, the Housing Supply & Partnerships team work on individual developments to facilitate the delivery of additional affordable housing. One such development is Manley Heights/Williamson Heights on the site of the old Mahatma Gandhi House. Originally, this was intended to be a 198 unit development containing 25 affordable rent and 15 Shared Ownership Homes. The Housing Supply & Partnership team worked with Peabody and to see the entire number of outright sale properties converted, increasing the number of affordable homes to 123 Shared Ownership and 75 affordable rent. It should be noted that the COVID-19 crisis may lead to a reduction in the Shared Ownership homes. However, the affordable rent will be retained and these will be offered to nominees from the Council's waiting list.
- 6.3 Collaboration Agreement Network Homes

RPs are also supporting the Council's development ambitions. On 9th March 2020, Cabinet agreed to enter into a collaboration agreement with Network Homes aimed at increasing the Council's development capacity. Network Homes are working with the Housing Supply & Partnerships team on 3 sites at Kilburn Square, Watling Gardens and Windmill Ct. The objective is to provide a minimum of 352 (see Table 4.4.4 above) new affordable homes on these sites. The Council is able to use the resources available at Network and has continued to engage with residents virtually in an effort to prevent time being lost during the current crisis. It is likely that the number of new homes planned will increase as the designs are further refined.

7.0 Greater London Authority (GLA)

- 7.1 The Council continues to work closely with the GLA and since December 2019 has secured additional grant allocation of £6.5m in respect of the Honey Pot Lane NAIL development.
- 7.2 During the current COVID-19 crisis the Council has been meeting (virtual) with the GLA to ensure that they are sighted on current progress and any potential problems that may arise causing delay and a consequent threat to the grant allocation.
- 7.3 The GLA have acknowledged Brent's ability to continue engagement of residents (virtual) on key sites, rather than stopping altogether as a result of the lockdown. It is relevant to note that more residents have attended our virtual meetings than the numbers that usually attended physical meetings.

8.0 Financial Implications

- 8.1 A Cabinet decision is required to let construction contracts that have a value in excess of £5,000,000. In December approvals were sought to delegate authority to the Strategic Director, Community Wellbeing in consultation with the Lead Member for Housing and Welfare Reform to let 5 contracts. This has allowed the programme to progress smoothly.
- 8.2 Over the course of the next 6 months there are no decisions required that cannot be dealt with using delegated powers however it is anticipated that there will be a number of significant decisions required by the time the next update is presented to Cabinet in December 2020.

9.0 Legal Implications

- 9.1 As stated previously there is no requirement at this half yearly review stage to request any Cabinet approval however the approach in respect of future developments is outlined below and mirrors the recommendations that were proposed and agreed in December 2019
- 9.2 The Financial Implications set out the position with regard to sufficiency of budget provision and the Director of Legal, HR, Audit and Investigations has confirmed that participation in respect of the GLA LDPD2 and SCAPE Major

Works framework agreements in relation to the 5 no. development sites is legally permissible.

- 9.3 As High Value Contracts under the Council's Standing Orders, award of development / construction contracts for sites with a value over £5,000,000 require Cabinet approval pursuant to Standing Order 88. In order to ensure an efficient delivery programme as previously agreed Cabinet will be provided with full details of each proposed contract and requested to delegate authority to the Strategic Director of Community Wellbeing, in consultation with the Lead Member for Housing and Welfare Reform, to award such contracts.
- 9.4 The estimated value of development or construction contracts less than £5,000,000 do not require a Cabinet approval because they are classed as Medium Value contracts under the Standing Orders and procurement and award of such contracts is delegated to the Strategic Director/Operational Director. In these cases Members will receive information via the six monthly update.
- 9.5 Significant grant funding has been secured from the GLA. The Council has entered into grant agreements with the GLA governing the award of such funding to include the requirement to deliver specified numbers of new homes. Failure to observe grant conditions or achieve specified delivery numbers may lead to a requirement to repay grant funding and therefore efficient and timely delivery approaches are essential to mitigate the risk.

10.0 Equality Implications

- 10.1 The Council has a statutory duty to consider the impact of its decisions on age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex (gender) and sexual orientation.
- 10.2 Equality Impact Assessments (EIAs) have been / will be completed as part of the planning application process to demonstrate that the Council has considered the quality impacts of its decisions in relation to design and development. EIAs / screening assessments will be available prior to the exercise of any delegated decision to award and will be taken into account in making any decision to award in relation to the key projects brought forward.

11.0 Human Resources / Property Implications

- 11.1 The Council's Development Team manages the contracts that are established and is supported by technical consultants as required. The Council has also ensured that it has access to additional capacity to deliver the programme by entering into the collaboration agreement with Network Homes.
- 11.2 The Council's Housing Supply and Partnerships Team will continue to facilitate and bring forward development sites in conjunction with a wide range of stakeholders, including acting as 'responsible client' for ensuring the NCHP is delivered in line with cost, quality and time expectations.

- 11.3 Support from a variety of Council teams in delivering the NCHP remains critical, covering specialisms such as planning, legal, communications, finance etc. A Design and Delivery Board provides the co-ordination required internally, whilst remaining accountable to the Housing and Care Investment Board that provides oversight and strategic direction.
- 11.4 To maximise the number of affordable homes being delivered and ensure rents can be set at London Affordable Rent levels, the Council is utilising Council owned land, which is under developed or unused. This means a number of sites are located within the grounds of existing Council developments.
- 11.5 Existing properties which are being used by local community groups and residents will continue to need proactive engagement, prior to and during transition into new facilities on site. Landowners adjacent to the development sites (i.e. NHS at Honeypot Lane) are also proactively engaged.

Related documents: Cabinet Paper - New Council Homes Programme 9th December 2019

Report sign off:

Phil Porter

Strategic Director for Community Wellbeing



Individual progress on sites

Table 1 shows the current position and likely year of handover if progress as forecast is maintained.

N.B London Rd and Twybridge (identified in red) do not figure in the statistics in section 4.3.2 due to the uncertainty of progress.

Table 1 – Individual progress on sites

Scheme	Homes	April 2020 Status	Anticipated Handover
Ellerslie Gardens	8	On site	20/21
Gloucester& Durham	84	On site	20/21
Kilburn Sq	24	On site	20/21
Grand Union	92	On site	21/22
Frontenac	4	Contract award letter due w/c 11.5.20	21/22
Gloucester Close	5	Contract award letter due w/c 11.5.20	21/22
Hindhurst Crt	8	Contract award letter due w/c 11.5.20	21/22
Mason Crt	8	Contract award letter due w/c 11.5.20	21/22
Kings Drive	4	Contract award letter due w/c 11.5.20	21/22
Kingston Hse	2	On site	21/22
Knowles Hse	149	On site	21/22
Oman Ave	7	On site	21/22
Gloucester & Durham	151	On site	21/22
Honeypot Lane	61	In Contract	22/23

BICC	29	Agreement for Lease and Deed of Surrender outstanding	22/23
Clock Cottage	13	Design team working on Section 73 and 96 Planning Applications	22/23
Learie Constantine	26	Agreement for Lease and Deed of Surrender outstanding	22/23
Preston Pk	12	Judicial Review delaying project	22/23
Milton and Hillside	73	Enabling works have commenced, Contract award letter to be issued in May 2020.	22/23
Brondesbury Rd clinic	55	Design works in progress	23/24
Watling Gardens	141	Design works in progress	23/24
Grand Union	22	On site	23/24
Kilburn Sq	126	Design works in progress	23/24
Windmill Estate	30	Design works in progress	23/24
Twybridge	67	Delayed by Section 77	TBC
Lidding	12	Scheme undergoing design review	ТВС
Longley	1	Scheme has planning approval awaiting build tender	TBC
Pharamond	10	Planning Application Submitted	ТВС
Seymour	3	Design being worked up	ТВС

ABC	9	Planning Application Submitted	
Sycamore	1	Planning Application Submitted	TBC
London Rd	170	Delayed by Section 77	TBC
Moreland Gardens	65	Planning Application Submitted	TBC





Cabinet 20 July 2020

Report from the Finance Director

2019/20 Revenue and Capital Outturn Report

Wards Affected:	All
Key or Non-Key Decision:	Key
Open or Part/Fully Exempt:	Open
No. of Appendices:	None
Background Papers:	None
Contact Officer(s):	Minesh Patel, Director of Finance Minesh.Patel@brent.gov.uk Tel: 020 8937 4043
Contact Officer(S).	Ben Ainsworth, Head of Finance Benjamin.Ainsworth@brent.gov.uk Tel: 020 8937 1731

1.0 Purpose of the Report

1.1 This report sets out the outturn of income and expenditure against the revenue and capital budgets for 2019/20.

1.2 Revenue

- 1.1.1. Overall, the council's revenue position was breakeven. Overspends in Community Well Being, on Adult Social care, and Children and Young People, in Localities and Forward Planning, Performance & Partnerships, were offset by underspends, especially within Regeneration and Environment. Other service areas spent to budget, with minor overspends being offset by minor underspends.
- 1.1.2. The Housing Revenue Account (HRA) also broke even after some adjustment to its plans to address the previously forecast overspend in year.
- 1.1.3. Additionally, the Dedicated Schools Grant (DSG) overspent by £4.9m due to an increase in demand for pupils with special educational needs (as set out in Section 3.9).

Overall revenue financial position 2019/20

	Budget (£m)	Actual (£m)	Actual Overspend/ (Underspend) (£m)
Assistant Chief Executive	7.8	7.8	0.0
Chief Executive Department	16.6	16.6	0.0
Children and Young People	48.8	50.3	1.5
Community and Well-Being	136.6	137.2	0.6
Customer & Digital Services	21.2	21.2	0.0
Regeneration & Environment	40.2	38.1	(2.1)
Subtotal Service Area Budgets	271.2	271.2	0.0
Central items (including Business Rates, Council Tax and Specific Grants)	(271.2)	(271.2)	0.0
Total General Fund	0.0	0.0	0.0
DSG Funded Activity	0.0	4.9	4.9
Housing Revenue Account (HRA)	0.0	0.0	0.0
Overall Position	0.0	4.9	4.9

1.2. Capital

1.2.1. The capital programme spent £29.2m less than its budget this year. This underspend is principally due to capital projects not progressing quite as fast as planned, especially in Housing Care Investment, Corporate Landlord and Public Realm. However, 89% of the council's in year capital programme was spent in year, and most of the remainder is available to be re-phased to 2020-21, as detailed in a separate report to cabinet.

Directorate	Full in year Budget (£m)	Expenditure in year (£m)	Over / (under) spend in year (£m)
Corporate Landlord	10.6	5.3	(5.3)
Regeneration	4.0	4.2	0.2
St. Raphael's Estate Regeneration	1.0	0.7	(0.3)
Housing Care Investment	203.0	186.0	(17.0)
Schools	10.8	9.6	(1.2)
South Kilburn	10.6	8.8	(1.8)
Public Realm	21.2	17.4	(3.8)
Grand Total	261.2	232.0	(29.2)

2.0 Recommendations

2.1 To note the overall financial position.

3.0 Detail

3.1. Assistant Chief Executive (ACE)

ACE Directorate	Budget (£m)	Actual (£m)	Overspend/(Underspend) (£m)
Chief Executive Office	0.5	0.3	(0.2)
Communications	0.5	0.6	0.1
Executive and Member	3.6	3.7	0.1
Services			
ACE Director	0.2	0.2	0.0
Strategy and Partnership	3.0	3.0	0.0
Total	7.8	7.8	0.0

- 3.1.1. This table provides an overview of the budget reported within ACE (Assistant Chief Executive), a new directorate created during the corporate restructure that took place in June 2019. This table also includes explanations for any reported variances against the year-end outturn. In summary, while there are overspends reported in some departments, mitigating actions were taken to bring the overall position to breakeven.
- 3.1.2. Communications have overspent by £0.1m compared to the budget due to a shortfall in income from film and advertising. This is primarily due to the general 'cooling' of the market for film location enquiries. This is covered by underspends with Chief Executive's Office. The JCDecaux contract commenced in January 2020 will help mitigate this pressure in the long term.
- 3.1.3. Executive and Member Services have an overall position of a £0.1m overspend due to higher levels of spend than anticipated on translation services. However, in the long term, mitigating actions have been put in place to ensure spend is contained within their overall budget.

3.2. Chief Executive Department (CED)

CE Directorate	Budget (£m)	Actual (£m)	Overspend/(Underspend) (£m)
Legal, HR and Audit	8.8	8.8	0.0
Finance	7.8	7.8	0.0
Total	16.6	16.6	0.0

3.2.1. All departments within CED have spent within budget at the end of the financial year.

3.3. Children and Young People (CYP) (GF)

Operational Directorate/Service	Budget (£m)	Actual (£m)	Overspend/ (Underspend) (£m)
Central Management	1.2	1.1	(0.1)
Early Help	5.5	5.2	(0.3)
Inclusion	1.7	1.7	0.0
Localities	14.3	15.4	1.1
Looked After Children and	6.2	6.1	(0.1)
Permanency			
Forward Planning, Performance &	18.1	19.1	1.0
Partnerships			
Safeguarding and Quality Assurance	1.7	1.7	0.0
Setting and School Effectiveness	0.1	0.0	(0.1)
Total	48.8	50.3	1.5

- 3.3.1. The Children and Young People department overspent by £1.5m, an increase of £0.5m compared to the forecast outturn at Quarter 3. As part of management action to reduce the CYP overspend a mitigation plan was drawn up totalling £2.9m, however £0.3m included as part of the use of reserve assumption had already been committed. There was also an increase in the Localities overspend position of £0.2m mainly due to increased costs against the Care at Home and Direct payment budgets for the 0-25 CYP with disabilities service. The pressure overall for the department is because of the two main cost drivers i.e. the national challenge of recruitment and retention of social workers and demand for placements.
- 3.3.2. The Forward Planning, Performance and Partnership (FPPP) service has overspent by £1m in line with the reported position at Quarter 3. The department is managing to keep the numbers of children and young people taken into care at low levels when compared to neighbouring boroughs. At March 2020 the number of looked after children (LAC) remains low at 294 in comparison to available data of statistical neighbours in 2018/19 of 430. However, a challenge remains that these children who are in care are older, have needs that are more complex and are being placed in higher cost placements. The number of Care Leavers now aged 19-21 who were looked after has increased from 233 in March 2019 to 248 at the end of 2019/20, but the number is still lower than statistical neighbours averaging 279 in 2018/19.
- 3.3.3. The Quarter 3 report highlighted a pressure of £2.7m within the FPPP service with management action required to reduce the overspend to £1m. This mitigated position was achieved, due to a larger increase in the Unaccompanied Asylum Seeking Children (UASC) grant income than was previously forecast, a review of placements to ensure maximum health

- contributions are recovered and a contribution from a CYP reserve. These mitigating items are a total of £1.7m.
- 3.3.4. The Localities Service overspent by £1.1m in 2019/20. Overall the pressures in the service amounted to £2.9m. Management actions mitigating this pressure included reducing the number of agency staff, using the department's contingency and use of one off reserves. These actions totalling £1.8m reduced the overspend to £1.1m.
- 3.3.5. The use of agency staff has caused financial pressures. In addition, the Children with Disabilities (CWD) teams within Localities have been impacted by the increasing number of Education, Health and Care plans (EHCP). This is a national challenge and the Ofsted Annual Report 2018 stated that the level of demand for local authorities to undertake EHC needs assessments had increased by over 50% since 2015. This trend over the last 5 years evidenced locally in Brent has seen a 35% growth in the number of EHCPs. As at the end of 2018/19, there were 2,173 EHC plans and at the end of 2019/20, this number increased by 12% to 2,435. This has resulted in increased demands for children's social work and occupational therapy services.
- 3.3.6. The complexity of cases and turnover of staff within individual front line teams mean that in the year the Localities Service had averaged 16 more staff than the budgeted establishment, however as part of the mitigation plan to bring costs down, this number was reduced to 6.
- 3.3.7. The pressures mentioned above have been mitigated by underspends achieved in other services. The Early Help Service underspent by £0.3m due to an enhanced public health contribution to reflect the contribution the service makes towards 0-19 public health targets. The service, which also includes funding from the Troubled Families programme, in 2019/20, achieved a 100% performance against the programme's target and in claiming Troubled Families reward payments for qualifying families.
- 3.3.8. The Looked after Children and Permanency service underspent by £0.1m by the end of the financial year. This is also a demand led service however following an increase in funding allocation in 2019/20 to mitigate pressures, the service managed within budget and the underspend is due to in year vacancies held to mitigate pressures within the CYP department. There was also an underspend in the Setting and School Effectiveness service, due to the use of a non-ring fenced grant to offset pressures.
- 3.3.9. In 2019/20, the CYP department had a target to deliver savings of £1.4m. There was slippage due to delays to the Youth Service Roundwood savings and the reduction of non-case holding staff. These slippages have largely been contained in year as services have identified compensating underspends until the savings are fully implemented. It is not anticipated that these will lead to recurring pressures in 2020/21.
- 3.3.10. In 2020/21 CYP management will continue to scrutinise of the use of agency staff, and will continue to take steps to improve recruitment and retention of social workers. A shortage of social workers and other case holding staff is an

acknowledged regional issue, which requires a coordinated regional approach over the medium term. In 2020/21 there remains the risk of the volatility of demand for social care placements for Looked after Children and Care Leavers. These placements will be closely monitored as new placements may have to be found at short notice and can be extremely expensive when a secure accommodation or residential home placement is needed.

3.4. Community Well-Being (CWB) (GF)

Community Well- Being	Budget (£m)	Actual (£m)	Overspend / (Underspend) (£m)
Housing (GF)	10.0	10.0	0.0
Public Health	20.8	20.8	0.0
Culture	5.1	5.1	0.0
Adult Social Care	100.7	101.3	0.6
Total	136.6	137.2	0.7

- 3.4.1. Within Housing Needs, the average number of households requiring temporary accommodation fell from 2175 to 2030 when compared to the previous year. The resulting fall in expenditure was more than matched by a significant drop in grant income, with the MHCLG Flexible Homelessness Support Grant falling from £7.8m to £5.2m. Despite this reduction, a total of £1.2m of housing grants were taken to reserves to fund expenditure in future years. Within Private Housing Services, £2.2m of HMO licensing income was generated, £1m of which was put into reserves to fund future licensing activity. The council did not receive permission from central government to extend Selective Licensing for HMOs in the borough as originally intended, so this income will not be generated in future years and instead the reserve will be utilised to support this service.
- 3.4.2. The breakeven position on Public Health includes a movement to reserves of £0.5m. This is earmarked for the anticipated increased expenditure on Pre-Exposure Prophylaxis (PrEP) medication in 2020/21.
- 3.4.3. The Adult Social Care outturn position for 19/20 was £0.6m over budget. This is attributable to unachieved savings due to delays in the retender of Homecare and Day care contracts (£0.4m), and a delay in the deregistration of Tudor Gardens as a residential home to turn it into a supported living scheme (£0.2m).
- 3.4.4. There was a planned £0.4m Continuing Health Care (CHC) saving which was not fully achieved. However, this was offset through an over-achievement of savings delivered through the recommissioning of Housing Related Support

- contracts. The Council has recruited a dedicated CHC social worker to be able to challenge health more robustly when the Council considers that social care packages should be jointly funded. The effects of the recruitment of this additional support should enable this saving to be fully achieved in 20-21.
- 3.4.5. The Adult Social Care position was only achieved through the use of its remaining reserves drawn down to augment the in-year budget. Some of this covered one off legacy costs such as £0.5m relating to ordinarily resident cases that determine to be Brent Council's responsibility. Elsewhere, non-recurring iBCF funding were used to offset delays on the NAIL programme.
- 3.4.6. An analysis of the outturn position shows some financial issues going into 2020/21, other than those relating to covid-19. The HMO licensing income will be lower in 2020/21 and the plans for the enforcement team will need to be adapted over the medium term as the HMO reserves are used up.

3.5. Customer & Digital Services

Customer & Digital Services	Budget (£m)	Actual (£m)	Overspend/(Underspend) (£m)
CDS Director	0.3	0.3	0.0
Customer Services	10.8	10.7	(0.1)
Digital Services (SICTS)	0.0	0.0	0.0
ICT Client and Applications	5.9	6.0	0.1
Procurement	1.2	1.2	0.0
Transformation	3.0	3.0	0.0
Total	21.2	21.2	0.0

- 3.5.1. The Customer & Digital Services directorate is a new directorate created during the corporate restructure which took place in June 2019. The final outturn for CDS is a breakeven position. Below is an explanation of the variances between departments.
- 3.5.2. Customer Services underspent by £0.1m due the early delivery of savings planned for 2020/21 and general vacancies across the service. ICT Client and Applications overspent by £0.1m due to additional interim costs within the Information Governance service.
- 3.5.3. The CDS Director cost centre previously had insufficient budget to cover planned spend as at Q3, which was rectified following review in Q4. The Procurement outturn was £0.2m higher than the Q3 forecast following the agreed capitalisation of salaries.

3.6. Regeneration & Environment (R&E)

R&E	Budget (£m)	Actual (£m)	Overspend / (Underspend) (£m)
Environmental Services & Directorate	33.3	31.8	(1.5)
Regeneration Services	1.0	0.5	(0.5)
Property Services	5.9	5.8	(0.1)
Total	40.2	38.1	(2.1)

- 3.6.1. The underspend of £1.5m within the Environmental Services & Directorate area is the net impact of a £2.8m underspend offset by £1.3m pressures.
- 3.6.2. The underspends of £2.8m have occurred in a number of services, which include:
 - £1m underspend on Public Realm contact due to a reduction in waste tonnage that resulted in higher than anticipated income, as well as over provisions for property growth and for rebasing of recyclate in line with the terms of the contract.
 - £0.8m underspend due to additional income generated above the budgetary expectations. This includes additional income from cemeteries, improved income performance relating to permits and fixed penalties, increased income from licensing and larger than expected collection of court costs.
 - £0.7m underspend relating to continued scrutiny of departmental spend and general efficiencies across the directorate, as well as releasing funds set aside for projects across the departments that did not materialise.
 - £0.3m underspend on staffing costs as a result of prolonged staff vacancies, new vacant posts not yet filled or new staff not yet on the higher spinal point.
- 3.6.3. The £1.3m pressure includes:
 - £1m under-recovery of income within the Parking service; and
 - £0.2m overspend in Brent Transport Services.
- 3.6.4. The pressure in the Parking service is due to a £0.5m shortfall in permit income and £0.2m lower level of diesel surcharge permits sold compared to the budget savings target, as well as £0.2m fall in income due to decreased motoring activity as a result of the government's social distancing measures. The overspend in Brent Transport Services is due to identified additional cost pressures around taxi routes and the staffing contract with Drake as a result of the increase in passenger numbers this year.

- 3.6.5. The underspend in the Regeneration Services is predominately attributable to two factors. The first factor is additional income generated from planning fees resulting in £0.4m over-achievement in the Development Control area. The second factor is £0.2m underspend in Building Control due to staffing vacancies whilst the new structure for the team is implemented.
- 3.6.6. The Property Services underspend for the year is £0.1m and is a net result of a £0.3m underspend reduced by £0.2m pressures. A £0.3m underspend is a result of Business Rates charge for 2019/20 being lower than budgeted (one year impact only) and £0.1m underspend is due to cleansing of old accruals that are no longer needed. The overspend of £0.2m is within the Knowledge and Strategy service and is largely attributable to additional agency resource that was required.

3.7. Central items - Collection Fund

- 3.7.1. The budgeted net collectible amount for Council Tax (after exemptions, discounts and Council Tax support) is £153m. The net collectible amount at year-end was £151.8m, a slight increase of £0.1m since December 2019 as new properties were completed within the borough and recorded with the Valuation Office Agency. The overall shortfall against the budget is due to total number of new properties in the borough being completed later than forecast and therefore having a reduced effect on the tax base. At year-end the amount collected was 0.16% lower than the in-year target due to properties that have recently been completed, billed and are in arrears.
- 3.7.2. The budgeted net collectible amounts for Business Rates (after exemptions, reliefs and discounts) is £132.3m. The net collectible amount at year-end was £123.5m, a decrease of £3.6m since December 2019. The primary reasons for the movement since the previous quarter are: the high levels of properties taken out of commercial use (e.g., demolished or converted), successful revaluation appeal decisions, and an increase in reliefs granted to businesses. At year-end the amount collected was 0.47% below the in-year target and 0.79% below the amount achieved in the previous year.
- 3.7.3. Movements between the budget and actual collectable amounts affect the overall level of balances held on the Collection Fund at year end after deducting charges. The income due to the General Fund from the Collection Fund turned out on budget.

3.8. Dedicated Schools Grant

Funding Blocks	DSG Funding (£m)	Outturn (£m)	Over/ (Under)spend £m
Schools Block	229.9	230.9	1.0
Sixth Form funding	3.6	3.4	(0.2)

High Needs Block	58.7	62.5	3.8
Early Years Block	24.6	25.2	0.6
Central Block	2.3	2.0	(0.3)
Total DSG	319.1	324.0	4.9

- 3.8.1. The Dedicated Schools Grant (DSG) expenditure budget for 2019/20 was a total of £319.1m, which consists of £316.6m of grant income and £2.5m of DSG reserves, released in consultation with Schools Forum as one off funding.
- 3.8.2. Overall the DSG is in deficit of £4.9m, mainly due to pressures against the High Needs block, the pupil growth fund within the Schools Block, and the Early Years block allocations. This is the first year that the Council's DSG budget will be in a deficit position, however it is the same challenge faced by most Councils including most London Boroughs that had forecasted to be in deficit positions at the end of 2019/20. The DfE regulations (the School and Early Years Finance (England) Regulations 2020) make clear the requirement for any DSG deficit balance to be held within the local authority's overall DSG and carried forward to be funded from future years funding and/or recovery plans agreed with the DfE. This also means that authorities cannot fund a deficit from the general fund without the Secretary of State's approval.
- 3.8.3. The schools block deficit of £1m is mainly due to a £1.4m pressure against the growth budgets, which covers the cost of the choice and fair access panel (CAFAI) arrangements for new arrivals to Brent schools, as well as the impact of rising rolls in schools as pupil numbers grow. The growth in pupil numbers has mainly been within the secondary school phase and in 2020-21, this budget has been increased in line with forecast secondary growth following a consultation with schools and with the agreement of Schools Forum.
- 3.8.4. The pressure was offset by underspends in other schools block funded budgets, including a £0.2m underspend on the funds allocated to schools, mainly due to changes to National Non-Domestic Rates (NNDR) allocations. The original allocations were prudently estimated to ensure there was enough funding overall to cover any NNDR rate increases. Following a revaluation in 2019/20, schools funding has been updated to account for these changes.
- 3.8.5. The early years block which passes on 95% of its funding to providers totals £24.7m and this includes a £1m contribution from reserves to mitigate a pressure due to a prior year adjustment to DSG income, which resulted in a £1m underspend in 2018/19 as a result of take up being lower than anticipated. The deficit of £0.6m is mainly due to pressures arising from the impact of maintaining 2-year-old provision at £6 per hour, a higher rate of funding than that received from the DfE.
- 3.8.6. The central services block of the DSG totals £2.3m and underspent by £0.3m. This is mainly due to underspends against the cost of the admissions service, which follows team restructures and system changes relating to improvements in the digital delivery of admissions support.

3.8.7. The overspend in the high Needs block is complicated and is explained by the table below, and the following paragraphs:

DSG High Needs Block	Net	Outturn	Variance
	Budget	(£m)	(£m)
	(£m)		
Place funding in Brent Special Schools and ARPS	8.1	8.2	0.1
Top up funding in Brent Special Schools and ARPs	15.8	16.3	0.6
Top ups to mainstream settings in Brent	10.3	10.0	(0.2)
Targeted Funding	0.1	0.1	0.0
Post 16 Top ups	2.1	3.8	1.7
Out of Borough top ups	1.8	3.7	1.9
Residential and independent settings	8.3	8.9	0.5
Pupil Referral Units	3.0	2.9	(0.1)
Education Otherwise/ Awaiting Placement	0.8	0.5	(0.3)
Recoupment Income	(0.3)	(1.6)	(1.3)
Early Years Inclusion Fund	1.1	1.4	0.3
Support for Inclusion	1.0	1.2	0.2
SEN services	6.7	7.3	0.7
High Need Block- Income	0.0	0.0	(0.3)
Total Expenditure: High Needs Block	58.7	62.8	3.8

- 3.8.8. The high needs block budget in 2019/20 is supported by £1.1m (or 0.5%) of Schools Block income and by £1.5m of DSG reserves. The overall budget is in a £3.8m deficit. This is predominantly due to pressures of £4.5m against the high needs placements budgets, with the significant growth in the number of children with Education, Health & Care Plans (EHCPs) being the main driver of this pressure. This deficit also includes a £1.7m pressure on the post-16 placements budget, which is seeing an exponential annual increase in EHCP numbers as young people with EHCPs can now stay in education until the age of 25. The pressure also includes £0.5m additional charges for placements in other boroughs where the school is above capacity however, the DFE have recently confirmed that this charge should not be incurred by the commissioning local authority. It is therefore expected that this will be a significant cost avoidance in 2020-21.
- 3.8.9. Pressures amounting to £1.5m in the high needs placements budgets are also due to significant increases in expenditure against out of borough placements in mainstream and special schools, as well as residential and independent schools, where there have been significant increases in the number of EHCPs in the reception year group. The increases in numbers of EHCPs have also had a knock on effect on other high needs block funded services, such as the Educational Psychology Service and Speech & Language Therapy Service, which together result in an additional £0.8m pressure. These pressures have partly been mitigated by underspends of £0.7m on recoupment income received from other Local Authorities.

- 3.8.10. The DSG budget set for 2020/21 does not recover any of the deficit incurred in 2019/20 and the deficit will be disclosed as an earmarked usable reserve in line with DfE regulations (the School and Early Years Finance (England) Regulations 2020). The regulations make clear the requirement for any DSG deficit balance to be held within the local authority's overall DSG and carried forward to be funded from future year's funding and/or recovery plans agreed with the DfE.
- 3.8.11. Longer-term actions will be required to recover the deficit and a task group will be set up by the council to coordinate and monitor these actions. Some of these actions to reduce costs and mitigate the deficit include developing Alternative Provision education in the borough, increasing the amount of special provision within the borough for secondary phase pupils and 16-25 year old SEND students. The work of the DSG High Needs task and finish group has been slightly delayed due to Covid-19.
- 3.8.12. Also, new Additionally Resourced Provisions (ARPs) are being developed utilising the West London Alliance (WLA) of Local Authorities to develop its commissioning arrangements to address cost pressures for the High Needs block and a full and comprehensive banding review of EHCP funding. A combination of these longer-term recovery actions and anticipated funding increases will reduce the deficit.

3.9. HRA

HRA	Budget (£m)	Actual (£m)	Overspend/ (Underspend) (£m)
HRA	0.0	0.0	0.0
Total	0.0	0.0	0.0

3.9.1. The HRA has a balanced budget, whereby the expenditure budget of £53m is matched by income. The outturn for 2019-20 is in line with budgets. During the year, HRA faced budget pressure of £0.5m, mainly relating to in-year impact of committing to London Living Wage for the Estate Cleaning Team and associated costs of bringing the service in-house from September 2019. This budget pressure was mitigated through a combination of favourable variance on budgeted cost of financing on new borrowing £0.2m, and service charge recovery from leaseholders £0.3m.

3.10. Capital

Directorate	Full year Budget (£m)	Expenditure (£m)	Over / (under) spend (£m)
Corporate Landlord	10.6	5.3	(5.3)
Regeneration	4.0	4.2	0.2
St. Raphael's Estate Regeneration	1.0	0.7	(0.3)
Housing Care Investment	203.0	186.0	(17.0)
Schools	10.8	9.6	(1.2)
South Kilburn	10.6	8.8	(1.8)
Public Realm	21.2	17.4	(3.8)
Grand Total	261.2	232.0	(29.2)

- 3.10.1. The Council has an ambitious five year capital investment programme totalling £1.1bn which is financed from a combination of capital receipts, Council's resources and external borrowing.
- 3.10.2. The Council spent £232m, this equates to 89% of the approved capital programme budget and was under spent to budget by £29.2m or 11% as shown in Table 1 below. The underspend is planned to be carried forward to 2020/21 financial year. The reasons for the underspend to budget are explained below.
 - Corporate Landlord £5m loan was profiled to be made to the United College Group (UCG) for development works on their north west college site in year.
 - Regeneration Overspend due to Morland Gardens project commencing earlier than planned.
 - St Raphael's Estate Budget allocated to design procurement not fully spent in the year to be carried forward to next year.
 - Housing Care Investment £6m underspend on street properties acquisition programme to reduce housing pressure to be continued in 2020/21. The underspend is due to difficulties in identifying and securing a suitable pipeline of street properties and identified properties not producing the target yield required to make the acquisition viable. This was partly driven by property market conditions due to Brexit and economic uncertainty. £5m due to delayed works at some sites (Honey Pot Lane, Learie Constantine securing vacant possession and agreeing leases, BICC redevelopment and Brondesbury Road clinic) and restricted access to residents block to undertake planned works due to the coronavirus pandemic. £6m on Key Worker units acquisition payment profiled in year will be made in 2020/21.

- Schools £1.8m on annual maintenance programme and schools expansion programme planned to be carried forward and completed in 2020/21.
- South Kilburn underspend relate to delays on acquisition of schemes (William Dunbar and Saville, Crone Court and Austen House) planned in the year.
- Public Realm £3.8m underspend across infrastructure improvement programmes (such as landscaping, sports and culture, and highways s106 schemes) and footways work delayed with some planned works stopped due to the COVID-19 outbreak will recommence in 2020/21.
- 3.11.3. As the end of the financial year saw the outbreak of the coronavirus (COVID-19), the government imposing a lockdown across the UK and disruption to construction activities, the Council is continually reviewing its capital programme to assess the financial and delivery implications of the crisis on programmes and projects planned to be completed within the next financial year. With the exception of a few contractors/companies that ceased working on site or reduced their site activities but are now resuming as from May onwards, most of our capital programmes and projects have been progressing albeit with social distancing measures in place. There are no material impacts anticipated from the recent review undertaken.

4.0 Financial Implications

4.1 This report is about the Council's financial position in 2019/20. There are no direct financial implications in agreeing the report.

5.0 Legal Implications

5.1 Managing public money responsibly is key legal duty. There are no direct legal implications in agreeing the report.

6.0 Equality Implications

6.1 There are no direct equality implications in agreeing the report.

7.0 Any Other Implications (HR, Property, Environmental Sustainability – where necessary)

- 7.1 Not applicable
- 8.0 Proposed Consultation with Ward Members and Stakeholders
- 8.1 Not applicable

Report sign off:

Minesh Patel

Finance Director





Cabinet 20 July 2020

Report of the Director of Finance

Quarter 1 Financial Report 2020/21

Wards Affected:	All
Key or Non-Key Decision:	Key
Open or Part/Fully Exempt:	Open
No. of Appendices:	None
Background Papers:	None
Contact Officer(s):	Minesh Patel, Director of Finance Minesh.Patel@brent.gov.uk Tel: 020 8937 4043 Ben Ainsworth, Head of Finance ben.ainsworh@brent.gov.uk Tel: 020 8937 1731

1. Summary

- **1.1.** This report sets out the current forecast of income and expenditure against the revenue budget for 2020/21 and other key financial data.
- **1.2.** Excluding the impact of COVID-19, the Council was expecting an overspend of £0.9m on the General Fund (GF) which relates to Children and Young People. The HRA and DSG were expected to breakeven before the impact of COVID-19 is taken into account.
- **1.3.** COVID-19 is forecast to add an additional £37.4m of additional costs or loss of income to the general fund service areas, principally in Regeneration and Environment and Community Well Being.
- **1.4.** Offsetting this is additional income to date of £21.2m for COVID-19 (including £2.8m for the estimate of Brent's share of the latest funding announcement). Assuming only this additional income is provided to the council, this takes the overall forecast impact due to COVID-19 this financial year on the general fund to £16.2m.
- **1.5.** In addition, the new package of support includes provision for some income losses to be reimbursed where losses are more than 5% of a council's planned income from sales, fees and charges, with the government covering up to 75% of the remainder.

The impact of this is difficult to estimate at this point in time as the details of exactly how this will be calculated are yet to be announced. This additional funding will further reduce the overspend in year.

- **1.6.** The impact of COVID-19 on the Dedicated Schools Grant (DSG) is forecast as £0.1m, which is expected to be offset by savings found within the DSG.
- **1.7.** Currently, the impact of COVID-19 on the HRA is forecast as £2.9m, which is greater than the HRA reserves, therefore the HRA will need to consider mitigating actions such as reduced or deferred capital expenditure.
- 1.8. In total, the two sets of forecast overspends on the General Fund are £0.9m excluding COVID-19, and £16.2m for COVID-19; these forecasts add up to £17.1m on the General Fund. Adding in the further £3.0m for the combined overspend on DSG and HRA takes the total forecast overspend to £20.1m overall. The additional funding from central government for loss of income will reduce this overspend further.
- 1.9. The COVID-19 pandemic has also resulted in a number of underspends in service area budgets due to a reduced level of non COVID-19 related activity. In May, service areas were tasked with identifying and holding these underspends. It is anticipated that these one off underspends could be in the order of £5m. Details of the underspends identified will be reported in the quarter two report.
- 1.10. At the start of the COVID-19 crisis, central government indicated that they would pay for all the costs local authorities incurred as a result of the crisis, however more recent communications have suggested that local authorities may end up picking up some of these costs themselves. At this point in time it is unclear whether or not central government will be providing the necessary additional funds. If central government does not meet all these costs, then the council would need to meet these costs by utilising its earmarked reserves. Unlike other councils, the council's current reserves would be sufficient to sustain the immediate financial viability of the council. The main downside of using reserves is that it will mean that these reserves cannot be used for the purposes that they were originally earmarked for. This may affect the service delivery by the council, especially capital expenditure such as new housing. The impact of this will be kept under review, and updates will be provided as part of the budget monitoring and budget setting processes."

	Budget (£m)	Forecast Overspend / (Underspend) excluding COVID-19 (£m)	Additional costs/ loss of income due to COVID-19 and Savings shortfall (£m)
Assistant Chief Executive	7.5	0.0	0.6
Chief Executive Department	16.6	0.0	0.1
Children and Young People	46.4	0.9	2.7
Community and Well-Being	133.2	0.0	12.5

Customer & Digital Services	21.3	0.0	4.2
Regeneration & Environment	41.1	0.0	17.3
Subtotal Service Area Budgets	266.1	0.9	37.4
Central items (including Business Rates, Council Tax and Specific Grants, excluding specific COVID-19 grants)	(266.1)	0.0	0.0
Central funding for COVID-19	0.0	0.0	(21.2)
Total General Fund	0.0	0.9	16.2
DSG Funded Activity	0.0	0	0.1
Housing Revenue Account (HRA)	0.0	0.0	2.9
Overall Position	0.0	0.9	19.2

2.0 Recommendation

2.1. To note the overall financial position and the actions being taken to manage the issues arising.

3. Revenue Detail

Assistant Chief Executive (ACE)

Assistant Chief Executive (ACE)	Budget (£m)	Actual Forecast excluding COVID-19 (£m)	Forecast Overspend / (Underspend) excluding COVID-19 (£m)	Additional costs/ loss of income due to COVID-19 (£m)
Chief Executive Office	0.5	0.5	0.0	0.0
Communications	0.4	0.4	0.0	0.5
Executive and Member Services	3.6	3.6	0.0	0.0
ACE Director	0.3	0.3	0.0	0.0
Strategy and Partnership	2.7	2.7	0.0	0.1
Total	7.5	7.5	0.0	0.6

3.1.1. Excluding the various impacts of COVID-19, the department is expected to breakeven overall.

3.2. Taking account of the additional costs for COVID-19, the ACE department is currently forecast to overspend by £0.6m, made up of a £0.5m overspend in the Communications department and a £0.1m overspend in the Strategy & Partnerships department. Within Communications, there has been a loss of income due to cancellation of events in The Drum as well as lower than expected income from commercial advertising, roundabout sponsors and film production sites. Within Strategy & Partnerships, there are expenditure pressures from additional funding and capacity to support the voluntary sector. Additional costs also include the need to engage and build networks with smaller organisations in the borough in identifying COVID-19 impacts on vulnerable individuals and groups. Chief Executive Department (CE)

Chief Executive Department	Budget (£m)	Forecast excluding COVID-19 Impact (£m)	Forecast Overspend/ (Underspend) (£m)	Additional costs/ loss of income due to COVID-19 (£m)
Legal, HR and Audit	8.9	8.9	0.0	0.2
Finance	7.7	7.7	0.0	(0.1)
Total	16.6	16.6	0.0	0.1

- 3.2.1. Excluding the various impacts of COVID-19, the department is expected to breakeven overall.
- 3.2.2. With the impact of COVID-19, CE is currently forecast to overspend by £0.1m, made up of a £0.2m overspend in the Legal, HR and Audit department and a £0.1m underspend in the Finance department. Within Legal Support, there has been a loss of income by way of costs recoverable from third parties, for example in relation to s106 agreements and on client debt related matters due to reduced demand. There are also additional costs expected in providing specialist advice and upgrading of electronic services due to the lockdown of courts. Within HR, additional costs are expected in providing risk assessments and additional support for specialist counselling in respect of individuals or teams suffering from PTSD. Within Finance, electricity savings of £0.1m are expected relating to reduced use of Buildings as a result of COVID-19.

3.3. Children and Young People (CYP)

CYP Department	Budget (£m)	Forecast (£m)	Forecast Overspend /(Under spend) (£m)	Additional costs/ loss of income due to COVID-19 (£m)
Central Management	1.4	1.0	(0.4)	0.0
Early Help	4.6	4.6	0	1.0

Inclusion	1.3	1.3	0	0.0
Localities	14.5	15.4	0.9	0.2
Looked After Children and	6.3	6.4	0.1	0.1
Permanency				
Forward Planning, Performance &	16.5	16.9	0.4	8.0
Partnerships				
Safeguarding and Quality	1.7	1.6	(0.1)	0.0
Assurance				
Setting and School Effectiveness	0.1	0.1	0	0.6
Total	46.4	47.3	0.9	2.7

- 3.3.1. At this stage in the financial year, the Children and Young People department is currently forecasting an overspend position of £0.9m on the general fund following a £1.5m overspend in 2019/20. The 2019/20 pressure was reduced by a mitigation plan that identified £2.6m of one-off funding. This included use of reserves, holding posts vacant and raising approval thresholds. This year the department received growth funding of £1.8m and a contribution from the Social Care grant allocation of £1.7m. The forecast pressure reported is mainly against demand for looked after children's placements and cost pressures against the Children and Young People with Disabilities (0-25) care at home and direct payment budgets. These are offset by contingency budgets held in CYP central management.
- 3.3.2. The Forward Planning, Performance and Partnership (FPPP) service is at risk of overspending by £0.4m, following an overspend of £1m in 2019/20. Growth funds of £1.1m have been allocated to this budget this year and also included in the forecast is an expected increase in grant funding of £0.6m to support unaccompanied asylum-seeking children (UASC). However there remain pressures mainly due to an increase in residential placements costs. The main cost driver against this budget is the volatility of demand for social care placements for Looked after Children and Care Leavers. These are demand led placements and new placements may have to be found at relatively short notice, which can be expensive. The department is managing to keep the numbers of children and young people taken into care at low levels when compared to neighbouring boroughs. As at the end of April 2020 the number of looked after children (LAC) remains low at 295 in comparison to available data of statistical neighbours in 2018/19 of 430. However, a challenge remains that the children who come into care are often teenagers who have complex needs resulting in high cost placements.
- 3.3.3. In addition, the local authority is supporting a number of care leavers in semi-independent placements as part of their transition to adulthood. A number of care leavers who it had been expected would have moved into their own tenancies have had these tenancies delayed due to COVID-19 and more care leavers who would have been expected to move by September 2020 are likely to be accommodated for longer than anticipated. Initial analysis indicated that this would led to a £60k pressure but further analysis indicates the pressure could equate to £0.3m. This pressure is raised here as a risk and will be considered on a weekly basis as part of COVID-19 financial pressure reporting.

- 3.3.4. Management action in place to control spend includes establishing additional sign off processes at Children's Placement Panel; undertaking further work with finance colleagues to refine the forecast; more challenge and support around stepdown arrangements from residential placements to foster placements and/or semiindependent placements, monitoring and actively supporting the transition of care leavers to their own tenancies and reviewing financial policies and payments to carers for Special Guardianship support.
- 3.3.5. The Localities service is forecasted to be above its allocated budget by £0.9m at the end of the financial year - primarily due to pressures of £0.6m against the Children and Young People with Disabilities (0-25) care at home and direct payment budgets. The forecast is based on continuing demand pressures due to growing numbers of Education Health and Care plans (EHCPs) and the requirement to support the social care element of the plan. As at the end of 2018/19, there were 2,173 EHCPs and at the end of 2019/20, this number increased by 12% to 2,435 despite the overall pupil population remaining broadly the same. A separate £0.3m pressure is due to the additional cost of agency staff covering establishment posts. Current management action taken to reduce the number of agency social workers was reported to CMT on 14th May 2020, including the offer to agency social workers to opt to move to permanent contracts, career progression arrangements and the use of key worker housing. The forecast assumes that 20 agency staff will end their contracts before the end of the financial year and that these roles will be occupied by permanent staff. The overall position of permanent social work qualified staff across the department at the end of 2019/20 was 78%, an increase from 75% in 2018/19.
- 3.3.6. Localities caseload modelling is based on established national good practice and the current caseload is within the caseload ceiling. Where there is scope to safely reduce agency staff levels this is being undertaken. It is anticipated that as post COVID-19 lockdown restrictions ease there may be an increase in referrals. This could present a risk in increasing temporary agency numbers to cover a rise in demand. The Operational Director considers all requests for any new agency staff and extension requests for agency workers and there is close scrutiny of activity in this area.
- 3.3.7. The Looked after Children and Permanency service is forecast to overspend by £0.1m, arising from the costs of agency staff covering permanent roles and the commissioning of some adoptive placements, based on a child's best interests, with adoption agencies other than Adopt London West.
- 3.3.8. There is also a risk in the Early Help service where a balanced budget is reliant on an increased number of successful claims for the Troubled Families reward payments. Last year, the team successfully achieved 100% of their claims target. This year there was a reduction in the Troubled Families grant (TFG) of £0.6m however, this has been mitigated by deletion of posts and contribution from corporate funds of £0.4m.
- 3.3.9. The forecast assumes that COVID related pressures estimated at £1.2m include additional costs impacting the care at home and direct payment budgets, placement budgets (arising from the need to ensure there is greater supervision in foster and residential placements), and emergency payments for food and utilities. It also includes the impact of the loss of income in 2020/21 from traded services i.e. Brent

Music Service and the Gordon Brown Centre. Another cost pressure arising is due to a decision taken by Transport for London (TFL) to suspend free travel for under18s which will mean that the council will be required to fund statutory support for school travel from September 2020. This year the cost pressure could be in the region of £0.7m with an estimated full year financial impact of £1.1m. This decision will also have travel cost implications against the Looked after Children and the Youth Offending Service budgets, but the pressure is yet to be quantified.

3.3.10. Also reported against the COVID-19 impact pressures are the slippage expected against the department's two savings targets to be delivered in 2020/21. The targets include £1.49m to develop Family Wellbeing Centres (FWC) from children's centres. It is expected that the opening of these centres will now be December 2020 instead of September 2020 and the impact of this slippage is £0.8m. The other savings target of £0.1m, relates to developing a shared fostering service with two other West London Alliance (WLA) boroughs, resulting in staffing efficiencies. Progress is primarily dependent on the DfE starting the next round of funding to assist local areas in scaling up the models that have been agreed. It is estimated that savings of £30k can be identified in this financial year as the funding is unlikely to be agreed until September 2020.

Key Assumption	Downside if worse	Upside if better	Mitigations
That total caseloads in the Localities and LAC & Permanency service remain within budgeted levels of c. 2,500.	The commitment to hold safe caseloads means that if the total number of cases increased by 15% for the majority of the year, there would be an additional spend on social work staff.	Up to one third of case holding staff in some front line teams are agency. If caseloads reduce spend could be brought down.	Caseloads are being monitored across the service to allow management of social work resources.
The forecast assumes that there will be a number of agency staff within the establishment.	If the projected agency staff reduction does not occur this would add a further pressure to the budget of c£1m.	Additional reductions in agency staffing could reduce spend further	Continued management action to recruit permanent staff and reduce the reliance on agency workers.
The current mix of 600 LAC and Care Leaver placements remains broadly stable throughout the year. Unit costs remain stable.	A new individual high cost residential / secure placement can cost up to £0.3m per annum. A net increase of 10 placements with Independent Foster Agency (IFA) carers at a cost of £850 per	A reduction in demand or reduction in the use of expensive placements will see a reduction in costs.	Brent has a track record of maintaining stable and relatively low numbers of LAC. Targeted step down work to ensure more children are supported to transition from more expensive residential placements to semi-independent

week would cost an additional £0.4m.	placements and fostering options WLA commissioning function is being used to control unit costs.
	Joint commissioning with Health was successfully developed in 2019/20 and this will be built on to ensure further contributions to placement costs.

3.4. Community Well-Being (CWB)

CWB Department	Budget (£m)	Forecast excluding COVID-19 Impact (£m)	Forecast Overspend/ (Underspend) (£m)	Additional costs/ loss of income due to COVID-19 (£m)
Housing	8.1	8.1	0.0	5.3
Public Health	20.8	20.8	0.0	0.0
Culture	5.1	5.1	0.0	0.7
Adult Social	99.3	99.3	0.0	6.5
Care				
Total	133.2	133.2	0.0	12.5

- 3.4.1. Excluding the impact of COVID-19 CWB was expected to break even. COVID-19 is currently forecast to cost an additional £12.5m detailed below.
- 3.4.2. In Housing Needs a forecast £2.5m of additional cost will be spent on accommodating the increased demand as approx. 285 have presented as homeless and require accommodating through the outbreak. Most of these clients are considered as formerly hidden homeless, no longer able to 'sofa surf' with friends and family, who have been accommodated by the Council as part of the emergency response. The £2.5m is the result of a financial model which forecasts cost for accommodation, food and security in hotels, as well as one off costs for making permanent placements into the Private Rental Sector. This forecast is net of specific government grants and of assumed housing benefit income. The projections are based on moving on the majority of these new clients onto permanency by the end of Q2 as the emergency situation improves. However there is a cohort with no recourse to public funds (such as housing benefit) where decisions will need to be made about continuing to accommodate without any central government financial support. £1.2m of the total £2.5m forecast is made up of the cost of continuing to support the cohort with no recourse to public funds throughout Q3 and Q4.

- 3.4.3. Elsewhere in Housing there are potential costs of £0.3m for commissioning a homelessness support contract from the charitable sector, and the costs of additional temporary staffing in Housing needs both of which are needed to cope with the increased numbers of homeless people as described above.
- 3.4.4. £2.5m of the forecast variance is an estimate of uncollected rent from Housing Needs tenants in General Fund properties. As of week 8 the year to date collection rate was 20% below what was achieved last year, and this has been projected forward for the year. This is a severe forecast, but is not necessarily the worst case scenario, and it will continue to be monitored as the impact of the pending recession makes itself felt.
- 3.4.5. In the Culture and Leisure Service £0.6m of pressure is expected as a result of lost income from Bridge Park and Vale farm, and the cost of mothballing the Vale farm and Willesden Sports Centre to the end of Q2. A further £0.1m of library generated income is expected to be lost across the whole financial year.
- 3.4.6. In Adult Social Care, the major financial impact of the COVID-19 pandemic for CWB is the cost of procuring Personal Protective Equipment (PPE) and distributing it free of charge to care providers. The Council is better able to source and buy this equipment than many care providers who would struggle given the competitive market. Allocating it out to providers is part of the emergency response, but also prevents further pressure on cost of care as if this was left to providers themselves they may not achieve value for money and would pass on increased costs to the Council. As of the end of May £1.5m worth of PPE had been bought and the estimated usage rate is £114k per week, which results in the forecast of £5.9m. This forecast assumes that the procurement of PPE on behalf of care providers will continue until at least the end of the financial year.
- 3.4.7. For the duration of the emergency, care packages made by the CCG for clients discharged from hospital will be covered by the NHS. However once the emergency is declared over it is likely that the Council will need to cover these costs. The CCG packages agreed during the emergency are typically 20% more expensive than the usual cost to the council, and there have been approximately 3 times as many clients placed as would typically be made during this period. From Q2 to Q3, £0.4m is forecast for these excess costs as placements are continued until they can be renegotiated. There is also a forecast cost for additional staffing to come in and carry out the necessary care assessments which have not yet taken place for this cohort.
- 3.4.8. There are some other direct minor costs as a result of COVID-19 such as paying directly for care home agency staff, and for equipping the Peel Road NAIL scheme as a discharge facility. These costs total £0.1m.
- 3.4.9. Not yet included in the forecasts above are probable mitigating factors. The realigning of budgets in Adult Social Care in line with lower demand for care

- packages could release £1m. This is based on the emerging drop in usage and demand for domiciliary and residential care as evidenced by falling client numbers between March and April 2020. This drop in demand reflects both COVID-19 deaths and fewer applications into the system.
- 3.4.10. There are other possible mitigations that could be included to reduce the significant pressure. £1.5m of budget was earmarked for starting to implement the London Living Wage for Homecare workers, but the staged procurement for these increased rates of pay will not take effect until later in the year freeing up a potential £0.4m of budget this year. There are also some efficiency gains expected in the last quarter of the year from both homecare and the re-ablement procurements, which could total in the region of £0.2m.
- 3.4.11. The NAIL scheme is due to deliver savings of £2m in 2021/22 but an acceleration of the scheme, focussing on learning disabled placements could potentially provide some financial mitigation in 2020/21. Further financial forecasting is required here.
- 3.4.12. Also in the MTFS, there are some reported risks to savings such as an incomplete saving on Daycare from 2019/20 of £0.25m, but this should not result in a significant financial pressure as providers are only being paid to plan, and no transport costs are being incurred at the moment. Whilst there are risks to some other in-year savings, action will be taken to find compensating measures.

Key Assumption	Downside if worse	Upside if better	Mitigations
That the additional numbers of homelessness can be brought down to c.75 people down from 285 by the end of Q2.	Each person costs on average £380 per week to accommodate, so a delay for 13 weeks (1 quarter) of 10 people will cost an additional £50k.	Faster progress on homeless pathways will reduce expenditure by £380 per person per week.	Additional support (at additional cost) is being brought in to assist moving homeless clients along the various pathways. Use of FHSG reserves can offset the overspend.
That the YTD collection rate for Housing Needs stays at 75%, compared to 95% last year.	A 5% worsening in the collection rate will cost £0.5m	A 5% improvement in the collection rate will recover £0.5m.	Investigations into the reasons for the poor collection rate are continuing.
That the support for leisure services ends at the end of Q2, and income is received from them on.	This will cost £100k for every month the shutdown of leisure services continues.	If leisure services are resumed in full a month earlier than projected £100k will be saved and recovered.	Options will be reassessed if a longer term closure looks likely.
That the Council continues to provide PPE to social care	Any additional PPE demands will add to	Stopping the supply of PPE could save on expenditure, but	Potential to fund some expenditure

providers free of	the forecast £5.9m	providers are likely to then demand	from the Public
charge at a cost of £114k per week.	spend.	higher fees.	Health grant.
	16.0		144 1 111 11 000
That the additional	If this happens a	Projected at £200k a	Work with the CCG
cost of CCG	month earlier than	quarter, so if the	to prevent
placements reverts	projected it could	NHS continues to	excessively priced
to the council from	add c. £75k of	fund this will bring	care packages.
Q3.	expense.	the forecast cost	
		down.	

3.5. Customer & Digital Services (CDS)

Operational Directorate	Budget (£m)	Forecast excluding COVID-19 Impact (£m)	Forecast Overspend/ (Underspend) (£m)	Additional costs/ loss of income due to COVID-19 (£m)
Customer And Digital Services Director	0.7	0.7	0.0	0.0
Customer Services	9.9	9.9	0.0	2.4
Shared ICT Service	0.0	0.0	0.0	0.1
ICT Client And Applications Support	6.3	6.3	0.0	0.0
Procurement	1.3	1.3	0.0	0.4
Transformation	3.0	3.0	0.0	1.3
Total	21.3	21.3	0.0	4.2

- 3.5.1. Excluding the impact of COVID-19, the expectation is to break-even by year end.
- 3.5.2. The department is forecasting an overall impact of £4.2m due to COVID-19, including £1.3m shielding cost and £1.7m additional discretionary housing payments and cost of delays from processing housing benefit payments. The year to date cost of COVID-19 is estimated as £0.8m.

3.6. Regeneration & Environment (R&E)

R&E	Budget (£m)	Forecast excluding COVID-19 Impact (£m)	Forecast Overspend/ (Underspend) (£m)	Additional costs/ loss of income due to COVID-19 (£m)
Environmental Services	30.8	30.9	0.1	6.6
Regeneration Services	0.5	0.4	(0.1)	1.4
Property Services	6.1	6.1	0.0	0.6
R&E Directorate	2.2	2.2	(0.0)	8.7

Total	39.6	39.6	(0.0)	17.3
			` '	

- 3.6.1. The department is currently forecasting a net overspend of £17.3m for 2020/21 based on current trends and assumptions around COVID-19 implications. This is comprised of a £17.3m financial pressure due to COVID-19 and a break even position for the rest of the department. The break-even position includes £0.9m of non-COVID-19 related budgetary pressures which will be offset by efficiencies across the department.
- 3.6.2. The £0.9m financial pressure within the Environmental Service is a result of the following:
 - £0.5m under-recovery of parking income. This budget gap pre-dates coronavirus and is caused by a continuing shortfall in permit income against budget
 - £0.2m unbudgeted additional cost as a result of rebasing of the recyclate in line with the Public Realm contract
 - £0.2m within the Highways service
- 3.6.3. The above pressures are offset by efficiencies predominantly a result of additional income generated by the Cemeteries and Mortuaries service and underspends of staffing budgets as a result of held staff vacancies.
- 3.6.4. The department is significantly impacted by the COVID-19 outbreak and the largest attributable costs and income losses include:
 - £6.6m is the worst case potential additional cost for SEN transport (Brent Transport Service). This relates to a need to maintain social distancing within buses which reduces overall capacity and could mean that additional vehicles and drivers are required.
 - ii. £4.7m estimated reduction in income for parking due to reduced motoring activity
 - iii. £1.1m reduction in Highways & Infrastructure fees and charges scheme delivery could be impacted should contractor experience resource issues
 - iv. Public Realm: acceptance of liability for increased residual tonnage, agreement to pay Veolia agency staffing costs and loss of income from garden waste and bulky waste
- 3.6.5. The introduction of social distancing measures has affected the ability to achieve £0.3m of MTFS savings by additional income relating to commercial rental, building control and licencing income.
- 3.6.6. There are a number of risks and uncertainties within the service that may affect the projected outturn and assumptions made. There are uncertainties around the SEN transport spend and the way the service will operate due to social distancing

measures in vehicles and therefore additional service costs that are likely to arise as a result. The Parking Account is expected to incur a significant loss of income due to less motoring activity, however the impact is difficult to quantify at this stage and further analysis will be conducted as more data is obtained. Rental income is likely to suffer as tenants may be unable to pay rent and the recent introduction of new legislation that prevents the Council taking possessions for non-payment is also a factor. The impact on income anticipated from building control applications is also uncertain due to slow progress on current Major Projects and a potential reduction in the number of new Major Projects received

Key Assumption	Downside if worse	Upside if better	Mitigations
For the financial worst case scenario: SEN schools reopen fully in September and those on school transport are required to be socially distanced (2m) requiring additional drivers and buses	The financial worst case scenario is presented	If the additional capacity could be created by double runs using existing staff and vehicles, the additional cost would reduce from £950k per month to £275k per month	Distancing on buses is a national issue. Brent will work with Harrow and other Councils to seek mitigations.
Reduction in motoring activity seen in Apr 2020 will continue until mid-August followed by a return to pre-COVID-19 levels of motoring activity	Every additional month of reduced motoring activity in line with April actuals would lead to an additional £1m reduction in income	If motoring activity returns to pre-COVID-19 levels sooner than mid-August, the financial impact would be £1m per month less than anticipated	Parking charges or enforcement cannot be used for the purpose of generating income. Regular reviews of the actual parking charges and motoring activity will take place in order to assist forecasting

3.7. Central items - Collection Fund

- 3.7.1. The budgeted net collectible amount for Council Tax (after exemptions, discounts and Council Tax support) is £160.5m. The actual net collectible amount as at May 2020 has not changed since April 2020. It is expected that this figure may decrease during the year if new properties are not completed as expected and additional Council Tax Support granted to residents increases substantially due to COVID-19. This is being closely monitored to assess the overall impact over the timeframe of the medium term financial plan. As at the end of May 2020 the amount collected was 19.4% and in line with the revised in-year target. The amount collected in the same period last year was 21.8%.
- 3.7.2. The budgeted net collectible amounts for Business Rates (after exemptions, reliefs and discounts) is £130.5m. The actual net collectible amount as at June 2020 is £81.3m, a decrease of £49.2m since April 2020. This reduction is a direct result of additional reliefs granted to businesses as a result of COVID-19, where the council

will receive a grant to compensate for the loss of income. In any case, this figure can vary during the year as new assessments are made, which may include additional premises, or reductions due to successful appeals.. As at the end of May 2020 the amount collected was 11.75%, significantly lower than the amount collected in the same period last year, at 20.0%. This is primarily due to payment deferrals that have been granted to support businesses through the impact of COVID-19.

3.7.3. Movements between the budget and actual collectable amounts affect the overall level of balances held on the Collection Fund at year end after deducting charges. The income due to the General Fund from the Collection Fund is forecast on budget with no variation expected. As a result of COVID-19, it is expected that there will be a significant impact on the collection of council tax and business rates for the remainder of 2020/21. The impact of this reduction in income would be felt in 2021/22 as a one off deficit repayment to the Collection Fund, in line with the national accounting rules governing the collection of council tax and business rates. Further details on the short and medium term impact is described in more detail in the Medium Term Financial Outlook report on the same agenda.

3.8. Central items - Capital financing and other central items

- 3.8.1. It is expected that people and organisations who owe the council money will be slower to pay these debts. In some cases council initiatives, such as payment deferrals and reduced recovery actions, will have a direct impact on debt collection and ultimately fewer debts will be repaid in full. Some of the council's debt has already been impaired to recognise this, but these costs are uncertain and could increase. As a result of the postponement of normal debt recovery action, it is too early to be able to estimate the short and long term impact on collection. However, the data will continue to be monitored and analysed accordingly as recovery action resumes.
- 3.8.2. The capital financing budget for 2020/21 is £23.4m and is currently forecast to be spend to budget, as set out below.

	£m
Interest Payable	23.1
Interest Receivable	(7.2)
Capital Financing and Minimum Revenue Provision	7.5
Total	23.4

3.9. Dedicated Schools Grant (DSG)

Funding Blocks	DSG Funding (£m)	Outturn £m	Over/ (Under)spend £m	Additional costs/ loss of income due to COVID-19 (£m)
Schools Block	234.7	234.7	0	0
High Needs Block	61.3	61.3	0	0
Early Years Block	22.9	22.9	0	0
Central Block	2.2	2.2	0	0.1
Total DSG	321.1	321.1	0	0.1

- 3.9.1. There have been increases to the main DSG funding blocks for 2020/21, and budgets have been allocated and agreed by Schools Forum to address financial pressures caused by rising costs, pupil mobility and to provide a growth fund sufficient to support the rising pupil rolls in secondary schools. The Schools Block also contributed 0.46%, which is £0.9m, towards High Needs block expenditure to support the pressures in this block.
- 3.9.2. The DSG is currently reflecting a balanced budget. The main risk of variance to budget is within the High Needs Block. As well as a contribution from the Schools Block, the High Needs Block income received £5m more than in 2019/20, representing an 8% increase as nationally the pressure in this area is recognised. This is due to the exponential increases against Education, Health and Care Plans (EHCP), which specifies the amount, and type of support a SEND pupil requires thereby dictating costs. The risk remains that increases in the number of EHCPs as seen in previous years will result in increased costs and the trend over the last 5 years evidenced locally in Brent is a 35% growth in the number of EHCPs. At this stage, there is an estimated pressure against the central block of £0.1m because of the COVID-19 pandemic. The blocks will continue to be monitored and reported to Schools Forum in addition to Cabinet.
- 3.9.3. At the end of 2019/20, the DSG budget was in deficit of £4.9m and the budget set for 2020/21 does not recover any of the deficit incurred. The deficit has been disclosed as an earmarked usable reserve in line with DfE regulations (the School and Early Years Finance (England) Regulations 2020). The regulations make clear that the deficit can be carried forward to be funded from future year's funding and/or recovery plans agreed with the DfE. At the end of 19/20 the decision to establish a task group had been taken to coordinate and monitor these actions. Due to the COVID-19 pandemic, there has been a delay in the action.

3.10. HRA

HRA	Budget (£m)	Forecast excluding COVID-19 Impact (£m)	Forecast Overspend/ (Underspend) (£m)	Additional costs/ loss of income due to COVID-19 (£m)
HRA	0.0	0.0	0.0	2.9

- 3.10.1. The HRA has a balanced budget set for 2020-21. The potential budgetary impacts of the ongoing pandemic are currently estimated as a cost of £2.9m. This is based on the decline in rent collection rates experienced to date, extrapolated to forecast a full year impact of £2m.
- 3.10.2. Delays to new build developments are expected to push back the dates when properties are let out to tenants. It is estimated to add to loss of rental income by £0.2m, while the expenditure on new builds is not anticipated to underspend significantly against the annual capital budgets.
- 3.10.3. It is also forecast that service charges will be under recovered by 10% of all invoiced income, which is an estimated £0.5m. This is in line with the Bank of England forecasts on debt recovery.
- 3.10.4. There are additional costs (£0.2m) associated with providing estate caretaking services through the pandemic without compromising on service standards. For example, ensuring there is adequate personal protective equipment and temporary staffing resources above establishment to provide cover for colleagues staying in isolation. These costs are forecast to the end of the year.
- 3.10.5. There has been some disruption experienced on planned major works during the lockdown period. The asset management plan will be re-profiled to catch up with budgeted £17m of improvement works in this financial year.
- 3.10.6. The total forecast overspend of £2.9m will continue to be monitored through the changing environment. The HRA operating reserve stands at £1.4m, so mitigating action such as re-scheduling major works and new build capital investments will have to be considered if the position does not improve, to avoid HRA going into deficit.

4. Financial Implications

4.1. This report is about the Council's financial position in 2020/21, but there are no direct financial implications in agreeing the report.

5. Legal Implications

5.1. The law requires that the Council must plan to balance its spending plans against resources to avoid a deficit occurring in any year. Members need to be reasonably satisfied that expenditure is being contained within budget and that the savings for the financial year will be achieved, to ensure that income and expenditure balance.

6. Equality Implications

6.1. There are no direct equality implications in agreeing the report.

Report sign off:	
MINESH PATEL Director of Finance	





Cabinet 20 July 2020

Report from the Director of Finance

Medium Term Financial Outlook

Wards Affected:	All
Key or Non-Key Decision:	Кеу
Open or Part/Fully Exempt:	Open
No. of Appendices:	Appendix 1: 2020/21 savings— impact of COVID-19 Appendix 2: 2021/22 and 2022/23 savings Appendix 3: Capital programme budget 2020/21 - 2024/25
Background Papers:	None
Contact Officer(s):	Minesh Patel Director of Finance Minesh.Patel@brent.gov.uk Tel: 020 8937 4043 Rav Jassar Head of Finance Ravinder.Jassar@brent.gov.uk Tel: 020 8937 1487

1.0 Purpose of the Report

1.1. This report sets out the overall financial position facing the Council and highlights the significant risks, issues and uncertainties. It also sets out the proposed budget setting strategy for 2021/22 and beyond in order to maximise the period of consultation with residents, businesses and other key stakeholders. The report also presents an early overview and assessment of the financial impact of COVID-19 on the medium term financial strategy and to

- outline future steps to ensure the Council continues to operate in a financially sustainable and resilient way.
- 1.2. The budget for 2020/21 was set in February 2020, and on another report on this agenda the first forecasts against that budget are reported. This was a balanced budget that was predicated on the delivery of £7.4m of savings. In February 2020, Council also agreed the business plans for 2021/22 and 2022/23, which included savings of £4.3m and £1.8m respectively. Overall, the delivery of these savings, subject to the usual uncertainties regarding funding settlements and other planning uncertainties, would have resulted in balanced budgets in those years. Nonetheless, the level of savings required to balance the budget is inherently uncertain, simply because of the number of variables to be estimated and the difficulty of doing so over longer periods of time. This is further compounded by the significant reforms to local government funding that have been proposed (and delayed twice).
- 1.3 In addition, as part of this budget setting process, over the last two years the Council has been addressing historical overspends and has undertaken a more comprehensive review of demographic pressures and other expenditure pressures, which has ensured that the Council has moved to a more sustainable financial position.
- 1.4 Following the COVID-19 outbreak, the financial position has now significantly changed. The impact of the loss of income from fees and charges and the arrival of emergency costs have had an immediate effect on all local authorities, while in the longer term there is likely to be a further squeeze on public spending which could impact future funding settlement allocations. Overall, total estimated pressures of £47.6m are anticipated (including costs incurred in the 2019/20 financial year).
- On 2 July 2020, the government announced a new package of support for Local Government. A further £500m will be provided, of which Brent's share is estimated at £2.8m. This would bring the total amount of non ringfenced government funding to £21.2m. In addition, the new package of support includes provision for some income losses to be reimbursed where losses are more than 5% of a council's planned income from sales, fees and charges, with the government covering up to 75% of the remainder. Finally, any deficits on Council Tax and Business Rates income will be allowed to be spread over three years, rather than one. The detailed working of the scheme will be confirmed over the coming weeks as government draft the statutory instrument that will give the changes effect.
- 1.6 Whilst this announcement provides much needed additional funding, it is still insufficient to cover all of the current expected expenditure pressures. Likewise, while the partial support for the loss of income is welcome, until further guidance is released, it is not possible to quantify the benefit. It is clear that only some classifications of income will be partially covered, thereby leaving an unfunded gap. Therefore, the gap between the estimated cost of COVID-19 (£47.6m) and the government funding announced to date (£21.2m) is estimated to be £26.4m before the support for income losses is taken into

account. For context, the estimate for income losses and irrecoverable debts stand at £23m.

- 1.7 At this stage, it not clear if further funding from government will be forthcoming, nor is it clear how long the current circumstances will last, making financial planning and management exceptionally challenging. Equally, while one can be reasonably assured about government support for some, but far from all, current emergency expenditure, short to medium term income impacts alongside medium term expenditure looks set to place significant additional pressures. Initial estimates set out in this report suggest that, in addition to the pressures already identified, there may be recurring pressures of between £11m and £29m from 2021/22, which will significantly affect future budget setting.
- 1.8 As a result, the Council has cautiously started scenario planning in the event the Government fails to cover all of Brent's COVID-19 costs, as it is imperative for the Council to meet its financial responsibilities. Should the Government funding fall short of the full costs of COVID-19, as a financially responsible council, consideration of options to mitigate these impacts, in both the short and medium term, will be necessary.
- 1.9 The remainder of this report sets out the medium term risks and uncertainties with regards to the current budget assumptions contained within the Medium Term Financial Strategy (MTFS). This includes risks and uncertainties that already existed prior to COVID-19 and the new risks that must now be addressed. It also sets out the proposed budget setting process for 2021/22, which is the Council's minimum legal duty in respect of local authority budget setting. This report outlines some early considerations on the potential impact on the longer term financial position. In doing so, it must be recognised that the situation remains ongoing and it is extremely difficult to make a full, definitive and comprehensive assessment of the financial impact. As such, the figures in this report are based upon best estimates and forecasts and will therefore be subject to change. However, the significance of the financial challenge cannot be underestimated and over time, the council will need to develop a response that continues to maintain a commitment to strong financial resilience and sustainability.

1.10 This report is structured as follows:

- Recommendations for cabinet to approve;
- Strategic overview of Local Government finance;
- Future budget assumptions;
- Proposed budget setting process for 2021/22:
- Capital programme;
- Schools and the Dedicated Schools Grant;
- Housing Revenue Account;
- Overall summary and conclusion.

2.0 Recommendation(s)

- 2.1 That Cabinet note the contents of the report and the potential financial impact on the Councils Medium Term Financial Strategy.
- 2.2 That Cabinet agrees the budget setting process for 2021/22, including the approach to consultation and scrutiny, as set out in section five of this report.
- 2.3 That Cabinet confirm their intention, as previously announced and subject to consultation and any other material changes to circumstances, to increase council tax by 3.99% in 2021/22.
- 2.4 That Cabinet note the Capital budgets and agree the proposed 2019/20 capital budget carry forwards and capital virements set out in section six of this report.

3.0 Strategic Overview

- 3.1 In February 2020, Council agreed a Medium Term Financial Strategy (MTFS) that sought to provide the financial framework for the years 2020/21 to 2022/23. The programme, developed through a combination of effective financial management and cost control and more innovative approaches to investment and demand management, set out the delivery of £13.5m of savings (profiled £7.4m in 2020/21, £4.3m in 2021/22 and £1.8m in 2022/23) in order to deliver balanced budgets over the three year period. This followed a period of 10 years where, as a result of significant reductions in government funding and the challenges posed by new legislation, the Council had been obliged to make an unprecedented £174m of savings, despite an increase in demand for key services.
- 3.2 At the time the MTFS was agreed in February 2020, it was recognised that further funding strategies were required to close the overall budget gap over the three year period. These strategies included the recognition of further external grant income, a stress testing of growth assumptions and further scrutiny of spending and budget allocation decisions, including inflation and other technical adjustments.
- 3.3 It was also recognised that while the Council remained in a strong financial position, there were significant medium term financial risks that needed to be taken account of and managed to ensure the Council remained financially resilient. Most notably, these were around the uncertain funding outlook for local government, uncertainty around the long term funding for adult social care and emerging pressures in children's services.
- 3.4 Therefore, it should be noted that the Council was already operating in a significantly challenging financial environment prior to the outbreak of COVID-19.
- 3.5 Linked to the point earlier on the uncertain funding outlook, the Government announced on 24 March 2020, that the Comprehensive Spending Review

(CSR) would be delayed from July 2020 to enable the government to remain focused on responding to the public health and economic emergency. The intention was that the CSR would have set future public spending plans for the next 3-5 years and with it, an outline for the total quantum of funding for the local government sector.

- 3.6 At the same time, there had been an intention to introduce local government funding reforms from April 2021, including the outcome of the 'Fair Funding Review'. On 28 April, the Government confirmed that the Fair Funding Review, including the move to 75% business rates retention, would be delayed again and no longer be implemented in April 2021. At this stage, it is not clear when these reforms will be introduced.
- 3.7 At the time of writing, it remains unclear when the CSR will take place. It is doubtful that the government will be in a position in the near future to commit to public spending levels over the medium term given the current uncertainty and flux in the economy. This means that Brent, like all other local authorities, will need to continue to plan with little or no funding certainty over the medium term.
- 3.8 It should be noted that the COVID-19 crisis will almost certainly have a long term impact on the council's financial position and require the council to review its medium term financial strategy to ensure that it is still able to deliver the outcomes of the Borough Plan and maintain its financial resilience. Though the precise financial impact of COVID-19 remains difficult to predict at this early stage, officers will continue to report on the council's financial position to Cabinet at regular intervals in line with its existing governance arrangements.
- 3.9 As reported to Cabinet in April 2020, the initial estimate of the financial impact of the COVID-19 outbreak was c£35m. This was inclusive of additional expenditure pressures as a result of the outbreak (e.g. personal protective equipment for carers and front line staff, emergency accommodation for rough sleepers, overflow mortuary, support for residents that are shielding, etc.), loss of income (fees, charges and other commercial income from planning and building control, parking, rents, venue hires, etc.) and slippage of 2020/21 savings plans. Since then, these estimates have been further refined and are now estimated at £47.6m. This is made up of £42.7m of additional income and expenditure pressures and £4.9m of slippage in savings plans. Some of these costs were incurred in 2019/20 and so the figures reported in the Quarter 1 Financial Report 2020/21 on the same agenda will differ slightly.
- 3.10 London Councils has collated a summary of the London local government finance pressures based on the boroughs' recent finance returns and the results for Brent are broadly in line other boroughs, when expressed as a percentage of the overall budget.
 - Boroughs are estimating £1.8 billion of extra pressure on finances this year due to Covid-19.
 - Of this, £1.1 billion is caused by boroughs' income loss and £700 million by increased expenditure.

- The government support announced so far equates to £500 million for London boroughs, which means there is a remaining gap of £1.3 billion in new financial pressures.
- Boroughs' £1.1 billion income loss is due to falling returns from fees and charges, council tax, business rates, Housing Revenue Account and commercial income.
- Approximately half of boroughs' £700 million anticipated increased expenditure will be on adult social care and in covering planned savings that will not now be achieved. Over £50 million extra is expected to be spent on homelessness and rough sleeping, with a similar amount on children's social care.
- Boroughs have had £500m so far in emergency funding but boroughs are reporting their additional pressures in March, April and May already exceed this (£600m).
- 3.11 Clearly, the government funding received thus far has gone some way to relieve immediate financial pressures. The Secretary of State's commitment to give all councils the resources they need to support their residents and businesses through this pandemic cannot waver. At this stage, the level of government funding currently agreed is considerably lower than the expected financial pressures over the coming year. The council, alongside both the Local Government Association (LGA) and London Councils, will continue to engage with government to press for further funding support. In the absence of such funding, the Council will need to consider how it meets the increasing demand on its services within its limited resources.
- 3.12 Further details of these pressures and underlying assumptions are contained within the Q1 Budget Monitoring Report on the same agenda. Nevertheless, in so far as it relates to medium term financial planning, the focus of this report will be on the potential long term impact, where possible, of COVID-19 on current and future savings, as well as the possible long term income and expenditure assumptions.

Delivery of 2020/21 savings and impact on MTFS

3.13 The budget agreed by Council in February 2020 included savings of £7.4m in 2020/21, in order to deliver a balanced budget. Considering the work undertaken throughout the budget setting process for 2020/21 to ensure that robust and realistic savings and income proposals were put forward and implemented, it would have been expected to see the majority, if not all, of the proposals to be on track to be delivered. Understandably, immediate service priorities have changed as part of the emergency response to the outbreak, as well as managing the additional income and expenditure pressures arising on existing budgets, which inevitably would have an impact on the delivery of some savings plans previously agreed by Council.

3.14 The initial assessment of the impact of COVID-19 on the delivery of these savings is summarised by department in the table below. Further details on individual savings can be found in Appendix A. Overall, the majority of the savings at risk will be subject to some degree of slippage, rather than not being delivered at all.

	Savings Already Delivered	Slippage on delivery but still achievable	Savings unachievable	Total
	£m	£m	£m	£m
Assistant Chief				
Executive	(0.3)	0.0	0.0	(0.3)
Chief Executive	(0.1)	0.0	0.0	(0.1)
Children &				
Young People	(0.7)	(0.9)	0.0	(1.6)
Community				
Wellbeing	(0.5)	(3.7)	0.0	(4.2)
Customer &				
Digital Services	(0.4)	0.0	0.0	(0.4)
Regeneration &				
Environment	(0.5)	0.0	(0.3)	(8.0)
Total	(2.5)	(4.6)	(0.3)	(7.4)

3.15 Aside from the significant immediate financial pressures being experienced, from a financial planning and budget setting point of view, the analysis above is broadly positive at this stage in that savings are expected to be largely delivered, albeit not fully in the current financial year. If the assessment of the delivery of savings was that departments will not be able to deliver them at all, the consequences would be more fundamental and the council would need to consider more emergency measures and mitigating actions to ensure the overall budget can still be reasonably balanced. Further commentary on the impact of COVID-19 on the delivery of 2020/21 savings, as well as potential recurring pressures from 2021/22, by department is provided in the following paragraphs.

Community Wellbeing

3.16 A total of £4.2m savings were planned from the CWB department budgets, but £2m of this relates to the ongoing NAIL programme and were already re-profiled to the 2021/22 financial year, with reserves being used in 2020/21. In terms of those savings at risk, COVID-19 has affected some of the budgeted measures. The recommissioning of homecare and day care provision has been delayed in order to focus on the emergency response, delaying savings of £0.3m until 2021/22. The opening of the Family Wellbeing Centres has been pushed back to December 2020 so the public health recommissioning savings are also at risk. No significant financial savings are expected on this in 2020/21, creating a pressure of up to £0.5m.

- 3.17 COVID-19 will also affect those savings proposals that form part of the Temporary Accommodation reform plan. The crisis has caused delays to the construction and procurement of new properties. The threshold for TA placement has also been reduced due to COVID-19, which has temporarily increased demand through the lockdown period. In total, there are £1.1m of housing savings that are at risk. Whist alternative plans and mitigations are in place, there is a risk that the full savings target will not be achieved in 2020/21 due to COVID-19.
- 3.18 Looking ahead, the homecare commissioning exercise and the creation of the in-house re-ablement service is on track to take place in 2020/21, which should mean that planned efficiency savings are secured for the 2021/22 financial year.
- 3.19 The longer term impacts of COVID-19 are likely to put pressure on Adult Social Care budgets. Current use of PPE costs £1.5m each quarter and regardless of whether the Council buys this directly or Care Homes source their own, it will ultimately increase the overall cost of care. This could require up to £6m of additional funding in future years. There have been signs of an initial drop in demand for care following the outbreak, but in the longer term the demographic trends could continue to create the growth in demand included in the MTFS.
- 3.20 In Housing, the most significant medium term risk is to rent collection rates from both HRA and General Fund tenants. A severe or prolonged recession will depress the collection rates for a number of quarters and increase the levels of bad debts incurred by the council. If the current lower collection rates are sustained this could cost up to £5m per year.
- 3.21 Overall, it is estimated that the recurring additional pressures to the CWB budget could be anywhere in the region of £4m and £12.5m from 2021/22 onwards. A continuation of pandemic response measures will require additional resources for managing homelessness, and this service is also likely to be impacted by the forecast worsening economic situation for Brent. Between £1m and £2m could be required for Housing Needs in 2021/22.
- 3.22 A lengthy recession which impacts employment will continue to depress collection rates in 2021/22. The council could expect similar shortfalls in HRA rent and service charges to those forecast for 2020/21, totaling £1m to £2.5m. This is considered a medium term rather than longer term pressure, as when the economy improves collection rates are expected to return to 2019/20 levels. There is also likely to be a continued impact on rent collection in the Housing Needs General Fund budget of £2m.

Children & Young People

3.23 There are two savings targets to be delivered by the department in 2020/21 and due to the impact of COVID-19 there will be slippage in delivery of these savings. The targets include £1.49m to develop family hubs from children's

- centres, renamed Family Wellbeing Centres (FWC). Due to COVID-19, the contracts will be extended with the expectation of a revised go-live date of December 2020. It is estimated that the cost of the slippage will be £0.8m.
- 3.24 The other savings target in CYP of £0.1m relates to developing a shared fostering service with three other West London Alliance (WLA) boroughs, resulting in staffing efficiencies. In 2019/20, a grant of £0.1m seed funding was awarded to the WLA with Brent being the lead authority to create a West London fostering agency. A business case was developed for submission to the Department for Education (DfE) for further seed funding allowing creation of the joint fostering service but due to COVID-19, the DfE has suspended activity on this until further notice. However, is it estimated that some work on sharing marketing and recruitment functions will be able to take place and this could deliver £30k of the savings target.
- 3.25 During the pandemic, there has been a reduction in the number of referrals because of the partial closure of schools and the reduction in other partner services. However, the risk remains that there will be a surge in the number of referrals received by the department as restrictions are lifted.
- 3.26 There is also the impact of the loss of income in 2020/21 from traded services with schools. The largest losses of £0.7m are within the Brent Music Service and the Gordon Brown Centre. From week commencing 1 June there was a wider opening of primary schools for pupils in Reception, Year 1 and Year 6. Also, from week commencing 15 June, secondary school pupils in Year 10 and Year 12 were invited back into school for some face-to-face support with their teachers. However, due to the nature of services provided by the Brent Music Service and the Gordon Brown Centre and the social distancing measures required, there remains a risk to the level of income that these traded services can generate even following the wider opening of schools.
- 3.27 Another impact of the COVID-19 pandemic that will affect this department is a decision taken by Transport for London (TFL) to suspend free travel for under 18s. There are ongoing discussions taking place between Local Authorities in London, TFL and the Department for Transport (DfT) to understand the implications this decision will have. This concession has been in place since 2006. The withdrawal of free travel for under 18s means that the council will have to fund statutory support for school travel, as is the case for local authorities outside of London. Section 508B of the Education Act 1996 requires local authorities to provide free transport for all pupils of compulsory school age if their nearest suitable school is beyond 2 miles from home for under-8s and beyond 3 miles from home for those aged between 8 and 16.
- 3.28 Depending on the policy approach adopted by the Council, to fund statutory school transport costs, modeling of the potential financial impact estimates annual recurring costs of c£1.1m. This first scenario assumes funding travel costs when approximately 30% of primary pupils and 20% of secondary pupils are offered a nearest suitable school. However a second scenario assumes that all primary children will be offered a nearest suitable school and only a small number of secondary pupils could not be offered a nearest suitable school

therefore the cost pressure will be considerably reduced to £46k. It is anticipated that any changes would come into effect at the start of the new academic year, September 2020, and therefore the initial cost for 2020/21 is estimated as £0.7m against the first scenario and £31k against the second scenario.

3.29 The impact of this decision will also lead to pressures against the Looked after Children and the Youth Offending Service budgets in the region of £0.1m - £0.2m. However further work is required to model the costs and understand the wider administrative implications. Furthermore, no additional funding has been provided to Local Authorities for this new burden.

Regeneration & Environment

- 3.30 A total of £0.8m of savings was expected to be delivered by the Regeneration & Environment department in 2020/21. Of the five savings identified, two have been delivered. The service has delivered £0.5m of savings by dimming street lights and achieving staffing efficiencies.
- 3.31 The remaining three savings amount to £0.3m and relate to income generation. The ability to achieve them has been affected by the government's lockdown and social distancing measures. Both commercial rent, planning and building control income is expected to be severely affected due to this. In addition, activity in Wembley is unlikely to increase in the short term, which will have a negative impact on the ability to achieve the expected rise in licencing income.
- 3.32 As a result of the COVID-19 outbreak, the Regeneration & Environment department is anticipating some longer-term implications on its budget. A significant impact is expected on the SEN transport budget where the service is likely to incur additional service costs due to social distancing measures in vehicles. So far, SEN passengers have not returned to school in large numbers, and it is thought this may continue for the end of this academic year.
- 3.33 The Parking Account is expected to incur a loss of income due to the possibility of reduced car ownership leading to less motoring activity. However, there are signs that some income is recovering – PCN issuance has returned to 95% of pre COVID-19 levels.
- 3.34 It is also likely that rental income from tenants will be affected as they are unable to pay rents, while new legislation prevents the council from taking possession for non-payment. A further loss of income is anticipated from land searches, planning and building control applications as a result of a possible slowdown in the property market, slower than planned progress on current major developments and an expected reduction in the number of new developments. It is also anticipated that the reduced number of staff and visitors to the Brent Civic Centre will result in a long term reduction in budgeted income from the Brent Civic Centre car park.

- 3.35 The inevitable recession will almost certainly impact R&E's budgeted income across all activity levels. R&E is budgeted to generate £47.8m of income in 2020/21 with similar numbers in future years. At this stage it is too early to estimate the long-term impact, but a 10% average reduction, for example, would lead to a circa £5m shortfall. For comparison, in the first six months of 2020/21 it is estimated that R&E's total income is 35-40% below budget.
- 3.36 Overall, it is estimated that recurring additional pressures may be in the region of £5m to £16m from 2021/22. The largest components of future pressures are likely to be:
 - (i) SEN Transport: £3m £11m. This assumes social distancing is in place and schools are open.
 - (ii) Loss of income: £2m £5m. This represents 5% to 10% of R&E's total income.

Customer & Digital Services and Assistant Chief Executive

- 3.37 In total £0.7m of savings were planned across all of the corporate departments, which were primarily based on service modernisation, more digital services and realising other efficiencies. All of these savings were delivered early during 2019/20 and 2020/21 budgets were adjusted accordingly.
- 3.38 The most significant medium term risk in the corporate departments is the loss of income as a result of reduced bookings for weddings and other ceremonies, commercial venue bookings at the Civic Centre and commercial advertising. Although activity is expected to increase in the future, this could be to a lesser degree than previous years and could lead to recurring pressures of between £0.5m and £1m from 2021/22.

Overall summary

- 3.39 Overall, the estimates set out in this report are considerable in terms of loss of income and expenditure pressures (£42.7m) and delay in the delivery of savings (£4.9m) in 2020/21, as well as recurring pressures of between £11m and £29m from 2021/22. The consideration of options for managing the pressures from 2021/22 are described in section five of this report. With regards to managing the 2020/21 pressures, in the event that there is a shortfall in funding provided by government, there are some alternative options that could be implemented as 'one off' measures in order to keep the council on a sound financial footing.
- 3.40 As a last resort, the Council would utilise its reserves to contain any unexpected and one off expenditure pressures in 2020/21. The financial outturn position for 2019/20 showed that the Council held general reserves of £15.1m. In addition, the Council held £146m in earmarked reserves (excluding Community Infrastructure Levy funds and other ring fenced reserves) which are held to meet specific identified purposes or future expenditure commitments, a large proportion of which are for the financing of the capital programme.

- 3.41 General reserves reflect the ability of the Council to deal with unforeseen events and unexpected financial pressures in any particular year and are a key indicator of the financial resilience of the Council. As part of the Medium Term Financial Strategy agreed by Council in February 2020, the Director of Finance assessed that the optimum level of general reserves to be held by the Council should be between 5-10% of net expenditure. At 31 March 2020 general reserves were at 5.3% of the net revenue budget for 2020/21.
- 3.42 Furthermore, an annual assessment of Local Authority reserves has shown that the £15.1m of general reserves held by Brent are relatively low when compared to other London Boroughs of a similar size. This view has been endorsed by the external auditor in their annual review of the Council's financial sustainability. In addition, the Council is required to confirm, in accordance with the Code of Practice, that the statement of accounts is prepared on the basis that the Council will continue to operate in the foreseeable future and that it is able to do so within the current and anticipated resources available. Therefore, in the event that the COVID-19 costs are not fully funded by government the council has the option of utilising general reserves as a one-off measure. However, in this event, the council would need to find additional savings in the following year to replenish these reserves in order to demonstrate to external audit, and other interested parties, that the risk of financial sustainability is being mitigated.
- Instead, the Council is taking a proactive approach to managing the financial impact of COVID-19 and is proposing to implement a drive to identify non COVID-19 related underspends and other mitigating actions to compensate, as much as possible, for the impact of the estimated £4.9m of non-deliverable savings in 2020/21. Because of the COVID-19 lockdown measures, some expenditure that would otherwise be incurred by departments during the year has reduced. This includes less expenditure on staff travel, stationery, printing, etc. as well as energy savings from reduced building occupancy, less buildings maintenance related expenditure and posts being held vacant for longer. Therefore, it is important that these underspends are recorded to ensure that, as far as possible, the non-delivery of savings are mitigated before further severe measures are considered, such as expenditure restrictions on non-essential purchases, service reductions and a recruitment freeze. The progress of this strategy will be reported to Cabinet regularly as part of the existing budget monitoring regime.

4.0 Review of future budget assumptions

Council Tax

4.1 Council Tax is one of the most significant sources of income for the Council, making up £128.1m (or 44%) of total core funding in 2020/21 rising to £141.4m in 2022/23. The MTFS agreed by Council in February 2020 included an assumed council tax increase of 3.99% in 2021/22, the same as in 2020/21, where 2% is ring fenced for Adult Social Care and 1.99% represents general funding for council services. This increase will provide £7.1m of further

- additional recurring income for the Council and reduces the amount of savings required to close the overall budget gap.
- 4.2 Council Tax bills were sent to Brent residents around mid-March and since then impact of COVID-19 on households in the borough has been difficult and will be significant over the next few months. Financially, for some this is a worrying time. Brent established a new Council Tax Support (CTS) scheme in April 2020, which provides support to over 27,000 households in paying their bills and is one of the most generous in the country. The Government has provided Brent a hardship grant of £3.9m to help further support individuals in paying their Council Tax. In line with the government guidance, Brent has been reducing bills by up to £150 for over 7,000 working age households that receive some help through the CTS scheme but still currently pay something towards their council tax. In addition to the government support provided, the Council has not taken any new recovery action if residents are temporarily unable to pay council tax and postponed new debt recovery action for households falling into council tax arrears. Nonetheless, recovery action is planned to resume later in the year as it is important that any income due to the Council is collected to fund key council services.
- 4.3 When assessing the likely impact of COVID-19 on estimated income from council tax contained within the MTFS, there are three significant factors to consider:
 - Council Tax Support expenditure,
 - · Short and long term collection rates, and
 - Growth in the tax base.
- 4.4 Nationally, there has been an unprecedented increase in the number of Universal Credit claims received by the Department of Work and Pensions. As at May 2020, 2m applications were processed which is six times the volume normally expected. People who are eligible for Universal Credit are also eligible for some form of CTS with the Council, depending on their level of income. As at the end of June 2020, 928 applications for CTS were awarded, an increase of 5% compared to April 2020 at a cost of £1.9m. For the avoidance of doubt, an increase in the amount spent on CTS reduces the total amount of council tax income collectible for the Council. The budgeted amount of spend on CTS in 2020/21 is £27.7m and based on current modelling suggests an increase of £2.8m is likely. According to the grant conditions, the hardship grant is not allowed to fund the general increase in CTS expenditure. The impact of this inyear reduction in income would be felt in 2021/22 as a one off deficit repayment to the Collection Fund, in line with the national accounting rules governing the collection of council tax.
- 4.5 The judgement to be made with regards to financial planning is the extent to which this level of CTS expenditure is expected to continue. At this stage of the pandemic it is clearly too early to make a reliable judgement, however the data will continue to be monitored and analysed accordingly. There is an argument that as lockdown eases and some residents are able to return to work, the change in circumstances will mean those in receipt of Universal

Credit, and likewise CTS, will reduce and therefore bring CTS expenditure to levels that are tolerable within the current risk parameters of the MTFS. Likewise, the long term economic impact could be such that some businesses are unable to survive as government interventions reduce in line with the easing of lockdown measures, resulting in high unemployment levels and CTS expenditure in the medium term. In this scenario, if CTS expenditure is maintained at the levels currently expected, it would lead to a budget gap of £2.8m from 2021/22. There is also the option of increasing council tax above the current proposed increase of 3.99%, however this would mean holding a local referendum under the current government regulations.

- 4.6 Another factor that could affect Council Tax income is a reduction in the collection rate. Typically, in-year collection for Brent is around 96% and over a longer period of time will reach around 98%, which is built into the MTFS model and is broadly comparable to other London boroughs. Based on current modelling, a reduction in the 2020/21 collection rate of 3% would result in a £2.4m reduction of income. Clearly this is significant, however it is expected that collection will continue to be attempted in future years and reach the long-term collection rate target.
- 4.7 As a result of the postponement of normal debt recovery action, it is too early to be able to estimate the short and long term impact on collection. However, the data will continue to be monitored and analysed accordingly as recovery action resumes.
- 4.8 The calculation of the tax base is one of the technical stages in the process of setting the council tax. Brent, like all Local Authorities, has to work out how much next year's band D council tax should be so that the total tax that will be collected equals the budget required to pay for its services. In effect, the tax base represents the aggregate taxable value of all residential property in Brent. The council tax base is assumed to grow at 1-1.5% per year annum (or around 1,000 – 1,500 properties) and contributes nearly 30% to total budgeted council tax income in the MTFS. Therefore, if the rate of new housebuilding in the borough slows down as a result of COVID-19 the total amount of council tax income collected will be less than planned. The extent to which this impact is long term, will mean further savings and expenditure reductions will need to be found to balance the overall budget. The rate of new housebuilding will continue to be monitored through planning applications received by the council and new council tax registrations that are banded by the Valuation Office Agency. That being said, as lockdown measures ease over the next few months it is expected that housebuilding will continue broadly as planned and therefore the actual tax base growth will be within acceptable tolerances within the current MTFS model.

Business Rates

4.9 The council remains committed to supporting local businesses through this crisis. Funded by government, the council has processed a range of reliefs for various businesses across the retail, hospitality, leisure and other sectors. This has significantly reduced the amount of rates paid to the Council with the

reduction estimated at £53.6m. In addition, as at the end of May 2020, the council has administered direct grants to local businesses totalling £55.4m across 3,746 businesses. These are in the form of individual grants worth £10,000 - £25,000 depending on the size of the business. The council continues to engage with the business community to ensure that those eligible businesses have access to this support.

- 4.10 In addition, the government has provided £3.3m of additional funding to provide top-up grants to businesses not covered by the existing grant regime for small businesses and retail, leisure and hospitality businesses. Authorities will have discretion, but are expected to use funds in their area, subject to local economic need, focusing on small businesses with ongoing fixed property costs. The implementation of this scheme was agreed by Cabinet on 15 June 2020.
- 4.11 Irrespective of the range of support provided to businesses by Local Authorities, including the support provided directly by government (job retention scheme, loans, tax deferrals), it is inevitable that some businesses will be unable to pay their business rates during the COVID-19 crisis. Even as lockdown measures are eased, some businesses may be unable to trade effectively or are impacted by a reduction in customer demand. This will lead to an increase in bad debt for business rates and a loss of income collected. Based on current modelling, if collection rates reduced by c3%, the loss of income would be £4.3m.
- 4.12 The Government designated a pan-London business rates pool in 2018/19, which piloted 100% retention in that year, and was revised to pilot 75% retention in 2019/20. For 2020/21 the Government decided not to renew the London pilot, and for London to revert back to the pre-existing 2017/18 67% retention scheme (30% borough share, 37% GLA share, 33% Government share).
- 4.13 Pooling allows authorities to be treated as if they were a single entity for the purposes of calculating tariffs, top ups, safety net payments and levies. The financial benefit comes from the pool overall paying a lower levy on growth than the boroughs would paid individually. Within the system, a safety net exists that would prevent local authorities' income from falling below a certain level. This would provide protection for authorities who saw significant reductions in their business rate income. For Brent, this safety net means that the maximum loss against the budget 2020/21 budget is £6.6m (7.5%). However, if this loss transpires, it would cause a further financial pressure for the Council.
- 4.14 London Councils will be undertaking financial modelling on the potential impact of a deficit on the pool, and individual boroughs, following the submission of forecasts from each London borough. The results of this modelling are expected later in the year and will, together with other intelligence and data gathering exercises on collection rates, be critical in better understanding the potential impact on the 2020/21 budget and future budget assumptions on business rates. It should be noted that Brent's proportion of the pool is relatively small, at 2%, compared to some boroughs with a larger stake (LB Westminster, LB Camden and the City of London contribute nearly 50% of all business rates collected in London) and so changes within the Brent have a small impact on the overall pool. However, reductions replicated across the pool, or

concentrated in boroughs with large contributions to the pool, will have a big impact on the overall outturn for the pool. Similar to the accounting rules governing the collection of Council Tax, a deficit in the pool would have to be borne by every London borough as a one-off repayment to the Collection Fund in 2021/22.

4.15 A further complication is that the future of the London pool is unknown at this stage as it requires approval from government as part of the 2021/22 Local Government Finance Settlement, expected in December 2020. There has been a different business rates retention regime every year since 2016/17 and any further change can have a significant impact on retained income, which further adds to the uncertainty in medium term financial planning.

Growth assumptions / Cost pressures

4.16 Critical to understanding the overall budget are the annual growth assumptions, or estimated increases in unavoidable expenditure, that are built in to medium term financial planning, for example contract inflation, pay inflation, meeting the cost of providing existing services for a growing population, etc. These estimates were put forward for the 2020/21 budget following an extensive review. For the avoidance of doubt, these expenditure assumptions represent the annual costs, all else being equal, that would have to be incurred just to stand still. A summary of these growth and cost pressures are shown in the table below.

Assumption	Extra cost per annum (£m)	Description
Demography	3.5	Estimated annual cost of providing the same services to a growing population.
Payroll	2.1	Based on a 2% pay award and new pay spines.
London Living Wage	1.5	Assumed average annual cost of making more contracts LLW compliant.
Contracts	3.9	Primarily based on 2% inflation and known contractual commitments.
Transport	1.3	Freedom passes and transporting children with Special Educational Needs.
Technical	0.5	Pensions, levies (e.g. West London Waste Authority) and other technical items.
Capital financing	0.2	Interest and debt repayment costs for the capital programme.
Total Growth	13.0	

4.17 These growth assumptions will be further reviewed over the summer as part of the 2021/22 budget setting process in order to assess the extent to which the impact of COVID-19 changes these assumptions. In particular, the data on which demographic growth is based upon may need to be reviewed in light of the changes in various population age cohorts. Inflation on contracts is another large expenditure pressure for the Council which will need to be reviewed in light of the inevitable recession and economic contraction. Furthermore, growth may be required in future years to compensate for a permanent reduction in the budgeted level of income that the council is able to generate from fees, charges and other income. This is particularly relevant for the Regeneration & Environment department where there is a possibility that future income levels do not fully reach the levels currently budgeted for, and therefore require growth in their budgets to compensate for the loss.

5.0 Proposed budget setting process for 2021/22

- Prior to the outbreak of COVID-19, the budget agreed by Council in February 2020 set out a savings programme of £6.1m between 2021/22 and 2022/23, which are set out in appendix B. This included agreeing that the budget should be constructed on the basis of a council tax increase of 3.99% in 2021/22, which meant that, subject to consultation and any other material changes to circumstances, no new savings proposals would have needed to be developed to achieve a balanced budget in 2021/22.
- 5.2 As noted earlier in the report, at this stage it is estimated that £4.9m of the total £7.4m savings programme for 2020/21 will not be delivered in 2020/21, but will be delivered in 2021/22. The current working assumption is that the savings planned for 2021/22 will be delivered, albeit this will also be kept under review.
- 5.3 Based on information and data available to date, officers initial estimate is that ongoing and recurring pressures in the region of £11m and £29m are expected from 2021/22 across all service areas and council tax collection. At this stage, this excludes estimates of future losses on business rates while further modelling is undertaken. Therefore, without any additional funding or reliefs form the government, the budget gap is likely to increase further.
- These estimates, which will be refined over the summer, will be a major factor in the construction of 2021/22 budget. For the avoidance of doubt, if all other budget assumptions remain as previously agreed, a budget gap of between £11m and £29m will be created. As a result, robust and credible plans will need to be developed, and agreed in February 2021, in order to deliver a legally required balanced budget.
- 5.5 A further consideration is the outcome of the Spending Review, which sets out the total quantum of funding the sector. This was expected in July and the intention was to set future spending plans for the next 3-5 years. At this stage it is not clear when the Spending Review will be announced. In addition to this is the Local Government Finance Settlement, which is typically announced in December, to confirm the funding for individual local authorities for 2021/22. A

welcome approach would be similar approach to last year's spending round, which effectively confirmed the settlement early in September, and rolled forward the existing settlement with an increase in funding. This lack of clarity means that the Council will need to continue to plan with little or no funding certainty over the medium term.

- 5.6 That being said, based on what is currently known, or can reasonably be assumed, about future funding settlements further reductions in expenditure will be required. The Council will need to take difficult decisions about which services to prioritise and protect and which to reduce in order to continue to deliver affordable and sustainable budgets.
- 5.7 In closing a budget gap of this magnitude and in a relatively short space of time, there are three main options for consideration:
 - Further savings will need to be developed in order to reduce expenditure. This could include further efficiencies, however options here are limited given the current savings programme already includes a significant number of efficiencies. Also, with new income generation options likely to be limited due to the current situation, it is possible that service reductions will need to be considered.
 - 2. Reduce growth assumptions. £13m of annual growth is currently built into the MTFS and any reductions here would have the effect of closing the overall budget gap. However, there is a risk that this stores up pressures in future years as service areas may be unable to contain unavoidable growth in demand for services due to population growth or fund contractually obliged inflation on contracts.
 - Scale back the capital programme. Pausing or stopping specific capital schemes that are funded by borrowing would have the effect of freeing up corporate revenue budgets already set aside to provide capital financing for the capital programme.
- 5.8 A further consideration is if government introduces new interventions specifically for long term COVID-19 related pressures. This could include a multi-year minimum funding guarantee to local authorities to compensate them for those income losses beyond their control. Another option may be to allow the capitalisation of losses, which would ultimately be funded by increased borrowing.
- 5.9 These options will be further examined in order to ensure their consequences are properly understood and set out for members. The outcome of this review will be presented to Cabinet as part of the draft 2021/22 budget in October 2020. The budget proposals will need to be consulted upon by January 2021 and therefore the proposed budget setting process following this Cabinet meeting is as follows:
 - Cabinet October 2020. This report will present the budget proposals to be formally consulted on to set the 2021/22 budget;

- The proposals, together with any changes made by Cabinet, will form the basis of consultation between October 2020 and January 2021 with residents, businesses and other key stakeholders;
- The Budget Scrutiny Task Group will review the budget proposals and report accordingly;
- The General Purposes Committee will review the calculation of the Council Tax base in December 2020.
- After the statutory processes of consultation, scrutiny and equalities have concluded, a draft budget will presented to Cabinet to recommend a final budget and council tax to the February 2020 Council meeting.

6.0 Capital programme

6.1 In 2019/20 the Council spent £232m, this equates to 89% of the approved capital programme budget for that year and was under spent to budget by £29.2m or 11% as shown in Table 1 below.

Table 1 – 2019/20 Outturn Position

Table 1 – 2019/20 Final Outturn position							
			Over /	Over / (Under) spend split			
Portfolio / Programme	Revised Budget (Approved Feb20)	Outturn	(Under) Spend to Budget	2019/20 Slippage C/FWD	Under Spend for Repurposing		
	£m	£m	£m	£m	£m		
Corporate Landlord	10.553	5.270	(5.284)	(5.284)	_		
HCIB - GF	23.190	18.057	(5.133)	(4.613)	(0.520)		
HCIB - HRA	110.032	110.489	0.457	0.457	_		
PRS I4B	69.749	57.471	(12.278)	(12.278)	_		
Public Realm	21.172	17.446	(3.726)	(3.674)	(0.052)		
Regeneration	4.049	4.178	0.129	0.129	_		
Schools	10.790	9.604	(1.186)	(1.186)	_		
South Kilburn	10.628	8.798	(1.830)	(1.830)	_		
St Raphael's	0.988	0.652	(0.336)	(0.336)	_		
Grand Total	261.151	231.965	(29.186)	(28.614)	(0.572)		

2020/21 Capital Budget Position

- 6.2 The capital programme currently has a revised budget of £350.9m. The original Budget of £292.5m was approved at full Council in February (See Table 2). The reasons for the budget increase are summarised in paragraph 6.5 and set out in Table 3 below.
- 6.3 The 2020/21 forecast outturn position is currently below budget, this is mainly due to budget profiling. The budget re-profiling exercise is currently being undertaken. However it is worth noting that at the end of 2019/20 c£29.2m of the capital budget was required to be brought forward (mostly relating to programme slippage and underspends). It is therefore proposed that this sum is re-profiled into 2020/21 and later in some cases, except for those schemes that reached final completion in 2019/20.
- 6.4 The revised budget position for 2020/21 to 2024/25 is summarised in Table 2 below and the detailed budget by programme are in Appendix C. Table 2 shows the impact of the proposed 2019/20 carry forwards and other budget adjustments.

Table 2 – Capital Programme Revised Budget 2020/21 to 2024/25

Board	2020/21 Revised Budget	2021/22 Revised Budget	2022/23 Approved Budget	2023/24 Approved Budget	2024/25 Approved Budget	Total 2020/21 to 2024/25
	£m	£m	£m	£m	£m	£m
Corporate Landlord	27.791	53.213	8.713	1.500	_	91.217
HCIB - GF	77.235	63.992	56.119	28.600	_	225.946
HCIB - HRA	109.472	86.441	8.062	0.895	_	204.869
PRS I4B	39.682	23.500	23.500	_	_	86.682
Public Realm	28.104	5.960	5.882	5.645	_	45.590
Regeneration	22.214	19.155	23.455	_	_	64.825
Schools	19.337	16.537	17.097	_	_	52.971
South Kilburn	26.511	24.019	15.227	5.931	5.452	77.140
St Raphael's	0.636	_	_	_	_	0.636
Total	350.981	292.818	158.054	42.570	5.452	849.875
Approved Feb 20	292.470	280.515	158.054	42.570	5.452	779.061
Budget Adjustments	58.511	12.303	0	0	0	70.814

- 6.5 The budget adjustments set out in Table 3 include:
- 6.5.1 £28.6m slippage and underspend from 2019/20 set out in Table 1 above.
- 6.5.2 Projects approved by Cabinet since February 2020

- £31.3m (£28m excluding on costs) for Grand Union 114 affordable units purchase.
- £6m budget virement for Uxendon Manor Primary School to complete the capital works on the school for September 2020 opening.
- £3.5m of Brent CIL contribution for three CCG Medical Centres.

6.5.3 Budget Additions agreed at Capital Programme Board (CPB)

 £3.2m planned Major Works on council housing stock proposed to be funded from £5m SDLT savings achieved on Gloucester & Durham acquisition.

6.5.4 Budget Changes to be agreed

- Capitalisation budget required for project staff cost proposed to be funded from £5m SDLT savings achieved on Gloucester & Durham acquisition.
- £0.188m New Alcohol Grant received to be utilised towards property for housing people at risk.
- £5m SDLT savings achieved on Gloucester and Durham 235 units acquisition re-profiled from 2021/22 is proposed to be utilised towards funding £3.2m addition to major works budget and capitalisation budget.
- £0.572m 2019/20 budget underspend (see Table 1 above) from completed NAIL acquisition programme proposed for repurposing in 2020/21.

Table 3 – Budget Adjustments Breakdown 2020/21 to 2024/25

	2020/21	2021/22	2022/23	2023/24	2024/25	Total
	£m	£m	£m	£m	£m	£m
2019/20 Slippage C/FWD	28.614					28.614
Projects approved by Cabinet since Feb20						
Grand Union Units	14.000	17.303				31.303
Uxendon Manor Primary School	6.000					6.000
CCG Medical Centres	3.472					3.472
Budget Additions agreed at CPB						
Major Works	3.232					3.232
Budget Changes to be agreed						
Capitalisation	2.433					2.433
Other - New Alcohol Grant	0.188					0.188
SDLT savings (re-profiled)		(5.000)				(5.000)
Budget for repurposing	0.572					0.572
Total	58.511	12.303	-	-	-	70.814

6.6 Further details on the 2020/21 forecast position is contained within the Financial Forecast report also on the agenda.

Pipeline

- 6.7 The programme agreed by Council in February 2020 included £545.2m for pipeline schemes. In evaluating the investment pipeline proposals several factors are considered. These include statutory requirements, demonstrable linkages to corporate priorities, the ability for proposals to generate revenue savings and, to a slightly lesser extent, their potential to generate future capital receipts or other financial returns.
- 6.8 Since February a number of proposals have been removed as decisions have been made not to take the schemes forward (£15.2m) and a new scheme of £3.472m for the CCG Medical Centres fit-out was added and promoted to the main programme following Cabinet approval. The current total of the pipeline schemes is £529.9m.
- 6.9 Schemes will be brought forward once further refined and subject to detailed business cases, they will be promoted to the main programme following Cabinet approval where necessary.

7.0 Housing Revenue Account

- 7.1 The Housing Revenue Account (HRA) is a ring-fenced account which contains the income and expenditure relating to the Council's landlord duties in respect of approximately 12,000 dwellings including those held by leaseholders.
- 7.2 The HRA budget is set each year in the context of the 30-year business plan. The business plan is reviewed annually allowing for horizon scanning and the identification and mitigation of risks in the short, medium and long term. Early identification of risks enables planning and implementation of mitigations to ensure the HRA can continue to remain financially secure and deliver on its commitments:
 - Expand and accelerate the development of new Council homes.
 - Continue to maintain and improve existing Council homes.
 - Transformation and continuous improvement of front line services to tenants and leaseholders.
- 7.3 From 2020/21 and the following four years the Council will have the power to increase rents annually up to a maximum of CPI + 1%. For 2021/22, CPI + 1% is expected to equate to 2.9%, which gives the potential to increase rental income by £1.2m and up to £6m over the 5 year rent control period. This follows a 4 year period of 1% annual rent reductions which were directed by the Welfare Reform Act 2016. The average rent in 2015/16 was £114.53 per week and currently sits at £115.08 per week in 2020/21. A 2.9% increase would equate to an average rent of £118.42 per week in 2021/22.
- 7.4 HRA rent setting needs to be considered in the context of the ring-fence and the 30-year business plan. A return to the CPI plus 1% model for the five years

from 2020 was expected to provide some stability and certainty over planned investment in the stock, service improvement and new development, at least in the medium term as a £1.2m increase in rent has the effect of an additional £34m investment in the HRA over a 30-year period. However the impact of COVID-19 and the expected recession on rent collection levels and bad debts, is being monitored and will likely require a reappraisal of HRA budget priorities, and savings to be found.

8.0 Schools and Dedicated Schools Grant

- 8.1 Following the COVID-19 outbreak, schools nationwide were required to close to the majority of pupils, however all schools were asked to remain open to support vulnerable children and children of critical workers. The DfE will fund exceptional costs it recognises that schools will face as a result of COVID-19 such as, increased premises related costs; support for free school meals (FSM) for eligible children who are not attending school; and additional cleaning.
- 8.2 Schools are under financial pressures due to rising costs. Staffing costs have risen due to minimum wage increases, national insurance changes, pension contributions and auto enrolment. In addition, there is also the more general inflationary cost pressures on goods and services.
- 8.3 School balances are also falling as a result of the ongoing financial pressures. Overall, balances have decreased by £2.5m from £16.1m in 2018/19 to £13.6m in 2019/20 and seven schools ended the financial year 2019/20 in deficit. The funding and expenditure pressures will persist, and are likely to require schools to take action to balance their budgets. Of the seven schools in deficit, the majority are expected to set a balanced budget in 2020/21, whilst a small number may require a licensed deficit agreement to recover the deficit over a three year period. The schools in deficit will be monitored closely throughout the year.
- 8.4 Schools are required to submit three year budgets annually and, in planning this, are starting to restructure staffing establishments where necessary, look for commercial and income generating opportunities, and for opportunities to work together on procurement. Some primary schools have falling numbers of pupils in their reception and key stage 1 year groups, and this directly reduces the funding allocated to them. These schools will need to react when planning their budgets and restructure their staffing capacity accordingly to match their income and pupil numbers. There is a financial risk that smaller schools with reducing numbers of pupils will result in more schools being in deficit.
- 8.5 The overall Brent DSG budget for the first time reported a £4.9m deficit at the end of 2019/20. This position is replicated across most other London boroughs that are forecast to be in deficit positions at the end 2019/20. In line with the School and Early Years Finance (England) Regulations 2020, any DSG deficit balance will be ring-fenced, held within the local authority's overall DSG and carried forward to be funded from future years funding and/or recovery plans agreed with the DfE.

- 8.6 The pressure in the DSG is mainly against the High Needs Block, as it is largely demand led and the number of children requiring support in both mainstream schools and special provisions is increasing. As at the end of 2018/19, there were 2,173 EHC plans and at the end of 2019/20, this number increased by 12% to 2,435 despite the overall pupil population remaining broadly the same.
- 8.7 The growth in EHCPs is a national challenge and a number of Local Authorities are reporting pressures against the High Needs Block in the DSG. The DfE recognises that it will have to be mindful of the pressures on high needs when deciding how to allocate funding in future years. Overall funding for schools and high needs is set to increase by £7.1bn in 2022/23 when compared to 2019/20. The Council set a balanced DSG budget for 2020/21 with a £5m increase in High Needs funding being allocated against the pressures in the block, in consultation with the Schools Forum. The increase will not reduce the deficit, which will carry forward into 2021/22. A combination of longer-term recovery actions and anticipated government funding increases will help to reduce the deficit, however there remains a risk that the number of EHCPs will continue to rise.

9.0 Overall summary and conclusion

- 9.1 Prior to the outbreak of COVID-19, local government continued to face an extremely challenging financial outlook following a prolonged period of austerity as well as disproportionate growth in demand for services. Since 2010 the council has delivered expenditure reductions of £174m, and agreed a further £13.5m to 2022/23. This has been delivered through a combination of effective financial management, cost control and more innovative approaches to investment and demand management. As government funding has been cut the population has grown and this has been particularly pronounced in the very oldest and very youngest age groups, which are statistically most likely to require services from the council, thus adding to the cost pressures. Coupled with the impact of legislative change and uncertainty on the outcome of proposed reforms to local government funding, this has created substantial financial pressures.
- 9.2 Therefore, the Council was already operating in a significantly challenging financial environment prior to the outbreak of COVID-19.
- 9.3 The COVID-19 pandemic has created a significant shock to the economy and resulted in significant unplanned expenditure and income losses as set out in the report. The full impact of this is not yet known and the ability of the council to deliver a balanced budget for 2020/21 will be challenging. The most significant uncertainty is on the impact of the pandemic on council tax and business rates income going forwards.
- 9.4 While it is absolutely vital to ensure local communities are supported through this crisis, the response comes at a significant cost, which is putting severe strain on all local authorities. In London alone, it is estimated that the financial

impact will be £1.8bn in 2020/21. This includes a significant drop in income of at least £1.1bn and increases in expenditure on services of over £700m. London boroughs have received almost £500m in emergency funding so far from government, but boroughs are reporting additional pressures in March, April and May of £600m. Therefore, while it has been welcome, the two tranches of general emergency funding announced so far have not even covered the financial impact of the crisis since March.

- 9.5 Another important point to note is that the government funding allocated to date does not reflect individual councils' levels of resilience and therefore their ability to recover after the pandemic. Irrespective of how the emergency funding has been allocated, there are no clear objectives for what the Government wants to achieve, or the process it is going to follow to get there. Clearly, the funding for local government should firstly ensure local authorities can provide the essential services to support the fight against COVID-19 and secondly to ensure that every authority is financially viable. So far, the focus has been on the former and this has partly been achieved (although there is still a significant shortfall). Increasingly local authorities will want to engage on the latter, and, without a reasonable commitment from government, the Director of Finance may have to consider issuing a section 114 notice. A section 114 notice requires the Director of Finance, in consultation with the monitoring officer, to report to all the authority's members if there is, or is likely to be, an unbalanced budget or if there is a risk that the council will not have the resources it needs to meets its expenditure commitments in a particular financial year. Issuing such a notice triggers a freeze on all but essential spending while a plan is dawn up to bring the budget back into balance. Therefore, it is important that government provide this certainty soon, otherwise Brent, like all other local authorities, will need to consider looking at a section 114 notice depending on their financial position.
- 9.6 Looking beyond 2020/21, the postponement of the fair funding review and 75% rates retention reforms is broadly welcome, and was somewhat inevitable given the reduced capacity of government to deliver these complex reforms. A welcome approach would be similar approach to last year's spending round, which effectively confirmed the settlement early in September, and rolled forward the existing settlement with an increase in funding. Beyond additional emergency funding packages, the next and bigger issue than fair funding is the quantum of resources needed by the sector to compensate for the ongoing shifts in councils' underlying cost and income pressures.
- 9.7 Focussing on the immediate need set a balanced budget for 2021/22, the core estimates that drive the Council's budget position will be revised and updated over the summer to take account of, where possible, the national policy direction on local government finance and other local specific factors with a view to reporting back to Cabinet on the longer term financial position in October.
- 9.8 Critical to the review of key financial assumptions will be the factors set out below.

- Demography. The extent to which changing demographic trends will vary from those previously assumed, and so increase or decrease the assumed cost of providing services.
- **Macro-economic conditions.** The effect of changes to forecast rates on inflation, interest rates and economic growth, as a long term proxy measure of earnings and employment and hence a determinant of deprivation and need for services.
- Local (and local government) specific factors.
- **National policy.** The key issues and developments in national policy (so far as the impact on local government finance can be discussed with any reasonable certainty) have been set out in this report.
- Local policy. Local choices to prioritise some services or policies over others is at the core of local government democracy and accountability, and the impact of possible policy initiatives will need to be factored into the planning process.

10.0 Financial Implications

10.1 The financial implications are set out throughout the report.

11.0 Legal Implications

11.1 Standing Order 24 sets out the process that applies within the council for developing budget and capital proposals for 2021/22. There is a duty to consult representatives of non-domestic ratepayers on the Council's expenditure plans before each annual budget under Section 65 of the Local Government Finance Act 1992. The council also has a general duty to consult representatives of council tax payers, service users and others under Section 3 (2) Local Government Act 1999.

12.0 Equality Implications

12.1 Under the Public Sector Equality Duty (PSED) in the Equality Act 2010, Brent Council is required to pay due regard to the need to eliminate unlawful discrimination, advance equality of opportunity and foster good relations between different protected groups when making decisions. The groups protected by law, also known as protected characteristics, are age, disability, gender, race, religion or belief, pregnancy and maternity, marriage and civil partnership, sexual orientation and gender reassignment. Although socioeconomic status (people on low income, young and adult carers, people living in deprived areas, groups suffering multiple disadvantage, etc.) is not a characteristic protected by the Equality Act 2010, Brent Council is committed to considering the impact on socio-economic groups.

12.2 The PSED does not prevent decision makers from making difficult decisions in the context of the requirement to achieve a significant level of savings across all operations. It supports the Council to make robust decisions in a fair, transparent and accountable way that considers the diverse needs of all our local communities and workforce. Consideration of the duty should precede and inform decision making. It is important that decision makers have regard to the statutory grounds in the light of all available material, including relevant equality analyses and consultation findings. If there are significant negative equality impacts arising from a specific proposal, then decision makers may decide to amend, defer for further consideration or reject a proposal after balancing all of the information available to them.

13.0 Consultation with Ward Members and Stakeholders

13.1 The detailed approach to the statutory consultation process will be set out as part of the budget report to be presented to Cabinet in October 2020.

14.0 Human Resources

14.1 Not applicable.

Report sign off:

Minesh Patel

Director of Finance



Appendix A: 2020/21 Savings

Department	Index	Reference	2020/21 original saving (£000)	Savings already delivered £000	Slippage on delivery but still achievable £000	Savings unachieaveble £000	Description	RAG Status	Comments / Mitigating Actions
Community Wellbeing	CWB001	Public Health re- commissioning	150	150			Additional efficiencies made through public health re-commissioning	Green	N/A
Community Wellbeing	CWB002	Public Health re- commissioning	500	250	250		Recommission Children's Centres and Health Visiting as a single contract	Amber	The development of eight integrated Family Wellbeing Centres has been delayed until December 2020 as a result of Covid-19. Some further work is required to demonstrate that the impact of the planned reduction in the number of children's centres will remain consistent with the terms of the Public Health grant, this is forecast to be only £250k. The council will then need to find other Gen Fund expenditure to apply PH grant funding to. Integrated Family Hubs for Brent families is expected to go live in September 2020 and part year effect of this saving is expected to be achieved in 2020/21. Any shortfall will be mitigated through further cost alignment to activities with Public Heath outcomes.
Community Wellbeing	CWB003	Public Health re- commissioning	125	125			Cease untargeted smoking cessation. Retain only a service for mental health service users and pregnant women	Green	Smoking cessation services have been decommissioned.
Community Wellbeing	CWB007	Housing – extended selective licensing	70		70		Proportion of the increase in License income to fund corporate overhead charge	Amber	Central Gov denied the request for extending licensing which this saving was based on. HMO Licensing reserves will be used to cover operational costs and this saving.
Community Wellbeing D Community	CWB009	Additional Housing Reform: Phase 2 Temporary Accommodation reform plan	600		600		Increased acquisition of private sector accommodation through I4B to meet demand from homeless households and thereby avoiding cost of future TA provision	Amber	New business case confirms how many street properties should be purchased and new build schemes to be bought. This was progressing well, but will be delayed by C-19 lockdown restrictions. Although the option to purchase additional housing units through I4B is slow to develop, there are other options being progressed (for example, the Council's New Build Programme) which is anticipated to reduce demands for temporary accommodation and therefore reduce costs.
We lNs eing ○	CWB010	Additional Housing Reform: First Wave Housing	250		250		Increased income generation through an investment in Private Sector accommodation by First Wave Housing, let at market rates	Amber	Saving is part of wider programme to reduce TA costs. The original proposal is not viable. Alternative scheme(s) will deliver this saving (for example, Knowles House).
Community Wellbeing	CWB013	New Accommodation for Independent Living	2,000		2,000		Increasing NAIL provision to support more users, but also developing provision to support higher need users and support some users who would have gone into nursing care	Amber	This saving has been agreed to be re-profiled to 2021/22 as part of the budget setting process. NAIL programme roll-out has been delayed because fo Covid-19 which may impact the ability for this saving to be fully realised in 2021/22. Further work is required to quanify the financial impact of the delayed roll-out. There are monthly project board meetings encompassing senior managers from Finance, Housing and Adult Social Care to ensure that the NAIL Programme remains on track as far as possible.
Community Wellbeing		Adult Social Care re- commissioning	250		250		Review of homecare and placement packages, re-commissioning day care	Amber	The saving is made up of a number of proposals, which is partly achieved. The full year savings were due to be achieved by September 2020 through reprocurement of Homecare (£400k) and Daycare services (£500k), but given impact of C-19 commissioners are unlikely to be able to meet this timetable, and savings are more likely to be achieved by April 2021. Homecare and Daycare procurement delays impacting on a combined £650k of savings in 19/20 which have created an in-year cost pressure. These savings will be achieved in 20/21 when both services are re-procured.
Community Wellbeing	CWB021	Housing Association Lease Scheme	300		300		Proposed to introduce a Reasonable Rents policy	Amber	Cabinet made a decision not to proceed with this scheme but will reconsider this decision in January 2020. Other planned developments will boost income and reduce the impact should this proposal not proceed. Drawdown from FHSG reserves is anticipated to bridge this gap in the interim, and there are a range of actions designed to reduce temporary accomodation costs. In addition the 'decanting' of South Kilburn will be delayed due to Covid-19, which means TA households can remain there at relatively low cost.
Regeneration & Environment	R&E001	Dimming street lights	100	100			The LED Street Lighting CMS provides the Council with the ability to adjust LED lighting output to create additional savings (£100k) by further reducing both energy costs and carbon emissions	Green	On track to deliver this saving.

Department	Index	Reference	2020/21 original saving (£000)	Savings already delivered £000	Slippage on delivery but still achievable £000	Savings unachieaveble £000	Description	RAG Status	Comments / Mitigating Actions
Regeneration & Environment	R&E004	Building control	35			35	The generation of additional income by the Building Control team. £100k is adjusting the budget to match current workload, with the remainder to come from out-of-borough associate work	Red	Income generation has been severely affected by the government's social distancing measures.
Regeneration & Environment	R&E008	Wembley licensing	50			50	Potential increase in revenue arising from increased activity in Wembley	Red	Increased activity in Wembley is unlikely due to the government's social distancing measures.
Regeneration & Environment	R&E018	Regeneration & Environment staffing efficiencies	450	450			Review of staffing model in Regeneration & Environment	Green	On track to deliver this saving, posts to be deleted have been identified and service teams are restructuring to fit in with available funding.
Regeneration & Environment	R&E023	Property	200			200	It is proposed to review all existing leases and other income raised with a view to generating additional income	Red	Commercial rental income is expected to be severely affected by the government's social distancing measures.
Children & Young People	CYP004	WLA Shared Fostering Service	100	30	70		Develop a shared fostering service with the 3 other WLA boroughs, resulting in staffing efficiencies	Amber	In 2019/20 a grant of £100k of seed funding has been awarded to the WLA with Brent being the lead authority to create a West London fostering agency. DfE have not yet announced bidding arrangements to help LAs implement the plans established during the prototype/scoping phase. DfE has currently suspended activity due to the COVID-19 pandemic there will be slippage in delivery of this savings. Some work on sharing marketing and recruitment functions can take place regardless of DfE funding but will not deliver the full saving (c£30k.)
Pap Children & Young People	CYP008	Family Hubs	1,491	690	801		Develop family hubs from children's centres	Amber	Report on Family Hubs Consultation went to Cabinet in October 2019. Current Barnardo's contract expires August 2020, so full saving will not be achievable in 2020/21. Due to the impact of COVID-19 it is planned that contract should be extended for an additional 3 months and the introduction of the Family Wellbeing Centres (FWC) will be delayed to Dec 2020. The impact of the delayed opening will lead to an overall slippage of c£0.8m.
Assistant Chief Executive	ACE001	Reducing voluntary sector grants	158	158			Proposed to reduce grants provided to three voluntary sector bodies	Green	N/A
Assistant Chief Executive	ACE003	Restructure of communications, conference & events department	100	100			It is proposed to restructure the communications, conference & events functions in 2020/21 to realign services to enable the team to maximise income generation opportunities while focusing more tightly on core corporate communications priorities only.	Green	N/A
Chief Executive	CED001	Legal savings - Demand management	50	50			Savings to recognise the impact of the Impower demand management review, income generation and bringing more work in house which will lead to less spend on external legal counsel	Green	N/A
Customer & Digital Services		Customer services	425	425			Service modernisation- more digital services and demand management revised operating model for managing access for all services, streamlining of structures following return of Council Tax in house.	Green	N/A
	Total		7,404	2,528	4,591	285			

Appendix B Summary of 2021/22 - 2022/23 budget proposals

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

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Detailed Capital Programme 2020/21 – 2024/25

Portfolio Holder	Portfolio	Capital Board	2020/21 (Revised Budget)	2021/22 Revised Budget	2022/23 Budget	2023/24 Budget	2024/25 Budget	Total 2020/21 to 2024/25
			£M	£M	£M	£M	£M	£M
	Civic Centre	Corporate Landlord	0.731	0.500	0.500	0.500	-	2.231
	Digital Strategy	Corporate Landlord	4.423	4.000	3.000	1.000	-	12.423
	Energy	Corporate Landlord	0.794	-	-	-	-	0.794
Resources: Cllr Margaret	ICT	Corporate Landlord	2.479	3.000	-	-	_	5.479
McLennan	Libraries	Corporate Landlord	0.048	-	-	-	-	0.048
	Property Management	Corporate Landlord	7.604	7.000	5.000	-	-	19.604
	Property Management – United Colleges Group	Corporate Landlord	11.500	38.500	-	-	-	50.000
	South Kilburn Estate Regeneration	South Kilburn	26.298	23.806	15.014	5.931	5.452	76.501
	Bridge Park Regeneration	Regeneration	0.889	-	-	-	-	0.889
	New Homes Bonus	Regeneration	0.057	-	-	-	-	0.057
Regeneration:	Olympic Way Pedestrian Improvements	Regeneration	3.432	8.700	-	-	-	12.132
Highways. Planning: Cllr Southwood	Housing Zones	Regeneration	0.290	-	-	-	-	0.290
	Town Centre Regeneration	Regeneration	3.473	-	-	-	-	3.473
	Harlesden Regeneration	Regeneration	4.485	-	-	-	-	4.485
	Morland Gardens	Regeneration	9.383	10.000	23.000	-	-	42.383
	Liveable Neighbourhoods	Regeneration	0.200	0.450	0.450	-	-	1.100
St Raphael's: Eleanor Southwood	St. Raphael's Estate Regeneration	St Raphael's	0.636	-	-	-	-	0.636
	ссту	Public Realm	0.258	-	-	-	-	0.258
	Landscaping	Public Realm	0.769	0.084	0.006	-	-	0.859
Regeneration:	Regen & South Kilburn - S106	Public Realm	0.093	-	-	-	-	0.093
Highways. Planning:	Highways & Infrastructure S106	Public Realm	1.340	-	-	-	-	1.340
Clir Tatler	Wembley Transport Improvements	Public Realm	2.728	-	-	-	-	2.728
	Highways & Infrastructure	Public Realm	18.642	3.500	3.500	3.500	-	29.142
	Transport For London [TFL]	Public Realm	2.275	2.145	2.145	2.145	-	8.710

Appendix C

Portfolio Holder	Portfolio	Capital Board	2020/21 (Revised Budget)	2021/22 (Revised Budget)	2022/23 Budget	2023/24 Budget	2024/25 Budget	Total 2020/21 to 2024/25
			£M	£M	£M	£M	£M	£M
Public Health: Culture & Leisure: Cllr Krupesh Hirani	Sports & Culture	Public Realm	0.611	-	-	-	-	0.611
	Parks	Public Realm	0.557	-	-	-	-	0.557
	Environmental Health	Public Realm	0.053	-	-	-	-	0.053
	Parking & Street Lighting	Public Realm	0.547	-	-	-	-	0.547
	Children & Youth Facilities	Schools	0.021	-	-	-	-	0.021
Environment:	Completed School Projects	Schools	0.107	-	-	-	-	0.107
Clir Krupa Sheth	Expansion of School Places	Schools	0.787	-	-	-	-	0.787
	Phase 3 Permanent Primary	Schools	6.140	-	-	-	-	6.140
	Phase 4 Permanent Primary	Schools	0.007	-	-	-	-	0.007
	PSBP Phase 2 Secondary	Schools	0.685	-	-	-	-	0.685
	Secondary School Expansion	Schools	6.993	14.040	14.040	-	-	35.073
	School Capital Improvement	Schools	4.436	2.337	2.897	-	-	9.670
	Aids & Adaptations	Housing GF	-	-	-	-	-	-
	Travellers Site	Housing GF	0.072	-	-	-	-	0.072
	Mixed Development	Housing GF	61.340	57.233	53.900	28.600	-	201.073
	PRS I4B – Phase 1	Housing GF	10.181	6.000	-	-	-	16.181
Housing & Welfare	PRS I4B – Phase 2	Housing GF	29.500	17.500	23.500	-	-	70.500
Reform: Clir Eleanor Southwood	RTB Affordable Housing	Housing HRA	34.005	18.098	-	-	-	52.103
	Enfranchisement	Housing HRA	2.104	-	-	-	-	2.104
	New Council Homes Programme (NCHP) - Phase 1	Housing HRA	-	-	-	-	-	-
	New Council Homes Programme (NCHP) - Phase 2	Housing HRA	4.534	14.666	0.737	0.079	-	20.016

Portfolio Holder	Portfolio	Capital Board	2020/21 (Revised Budget)	2021/22 (Revised Budget)	2022/23 Budget	2023/24 Budget	2024/25 Budget	Total 2020/21 to 2024/25
			£M	£M	£M	£M	£M	£M
	Major Repairs & Maintenance	Housing HRA	19.431	17.000	-	-	-	36.431
	New Council Homes Programme (NCHP) - Phase 3&4&5	Housing HRA	28.320	32.524	5.986	0.816	-	67.646
	St Ralph's Acquisition	Housing HRA	-	-	-	-	-	-
	In Borough Acquisition Strategy	Housing HRA	20.927	4.148	1.333	-	-	26.408
Adult Social Care: Cllr Harbi Farah	NAIL	Housing GF	15.020	5.810	1.270	-	-	22.100
All	Capitalisation	Capitalisation	1.776	1.776	1.776	-	-	5.328
			350.981	292.818	158.054	42.570	5.452	849.875
	Grants & Other Contributions		57.381	49.200	27.782	2.145	-	136.508
	S106 & CIL	22.716	18.014	1.950	-	-	42.680	
	Capital Receipts	33.089	18.275	19.514	5.931	5.452	82.261	
Funding Sources	Reserves		40.754	-	-	-	-	40.754
	Major Repairs Allowance		22.233	16.404	-	-	-	38.637
	Revenue Contribution	4.697	4.596	4.000	4.000	-	17.293	
	Prudential Borrowing	170.111	186.329	104.808	30.495	-	491.742	
			350.981	292.818	158.054	42.570	5.452	849.875

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Cabinet 20 July 2020

Report from the Assistant Chief Executive

Performance Report, Q4 (Jan – Mar) 2019/20

Wards Affected:	All
Key or Non-Key Decision:	Key Decision
Open or Part/Fully Exempt:	Open
No. of Appendices:	Appendix 1: Corporate Performance Scorecard
Background Papers:	None
Contact Officer(s):	Pascoe Sawyers Head of Strategy and Partnerships pascoe.sawyers@brent.gov.uk 020 8937 1045

1.0 Purpose of the Report

- 1.1 This report and the performance scorecard (**Appendix A**) set out the position on the Council's performance in the fourth quarter of 2019/20. The content and format of the report and scorecard have been revised to focus primarily on the Council's new Borough Plan; Building a Better Brent (2019-2023), and its priorities.
- 1.2 The purpose of this report is to provide Cabinet with a corporate overview of performance information linked to the Borough Plan priorities, to support informed decision-making and to manage performance effectively.
- 1.3 The Building a Better Brent plan was agreed by Full Council in early 2019. It provides a strategic picture of where the Council would like to be by 2023 and how it intends to get there. The Borough Plan has five overarching strategic priorities with detailed desired outcomes that will run for the duration of plan. To assist in the delivery of these outcomes, specific key priorities have been identified for each of the four years. These will be known as annual Delivery Plan Priorities.

- 1.4 The five priorities set out in the Borough Plan and their desired outcomes are as follows:
 - Every opportunity to succeed:
 - o Improvement in Key Stage results for boys of Black Caribbean heritage
 - Improvement in Key Stage results for looked-after children and care leavers
 - High-level skills achievement
 - Increase in average wage
 - A future built for everyone, an economy fit for all:
 - o Increase in inward investment achieved via the council
 - Produce our new Local Plan, setting out our vision, priorities and areas for future development in the borough
 - Increase in housing supply
 - o Reduction in the number of households in temporary accommodation
 - Keep traffic moving and our roads and pavements in good repair
 - A cleaner, more considerate Brent:
 - o Improvement in air quality
 - Reduction in illegally-dumped rubbish
 - A borough where we can all feel safe, secure, happy and healthy:
 - o Reduction in anti-social behaviour, the risk of harm and re-offending
 - o Reduction in violent crime, including gang and knife crime
 - Support our most vulnerable adults, enabling them to choose and control the services they receive, to remain independent and lead active lives
 - o Improve the health of Brent residents
 - o Make Brent a place where culture is celebrated and vibrant
 - Strong foundations:
 - o Enable more residents to get online
 - Making every pound count
 - o Building services around residents and their needs
 - Increase in resident satisfaction
 - Increase in resident involvement
- 1.5 The Corporate Performance Scorecard (Appendix A) sets out the suite of key performance indicators (KPIs); approved by CMT in August 2019, being monitored corporately. Commentary is mandatory in line with the current performance framework and is included in the scorecard. This applies to all measures that have a Green, Amber or Red RAG rating.

2.0 Recommendation(s)

- 2.1 Cabinet has been asked to:
 - a. Note the performance information contained in this report.

- b. Consider the current and future strategic risks associated with the information provided and agree remedial actions on strategic risks as appropriate.
- c. Challenge progress with responsible officers as necessary.

3.0 Detail

- 3.1 Overall, there are currently 128 key indicators in the Q4 performance scorecard. The format of the scorecard provides a distinct focus on Building a Better Brent priorities and outcomes.
 - The first part of the scorecard sets out 56 key indicators linked to the Year 1 Delivery Plan themed priorities. These indicators are presented graphically (2018/19 outturn figures are also provided where available).
 - The second part of the scorecard lists 72 key indicators linked to the wider Borough Plan priorities and the Council's 'Internal Business'. These indicators are presented in a 'at a glance format'.
- 3.2 Of the 56 Year 1 Delivery Plan indicators, 24 are on or above target (Green status), with a further six just off target (Amber status), leaving 11 significantly off target (Red status) and 15 indicators for contextual use.
- 3.3 There are 72 wider Borough Plan indicators in the Q4 scorecard. 28 are on or above target (Green status), 15 are just off target (Amber status), and 16 are significantly off target (Red status). A further seven indicators are for contextual use. The Corporate Performance team are awaiting data for six measures.
- 3.4 A summary of performance based on Borough plan priorities is set out below.

Building a Better Brent - Year 1 Delivery Plan Indicators

Every opportunity to succeed

3.5 The 2018/19 validated attainment data for the end of Key Stage 4 shows significant narrowing of gaps between the attainment of boys of Black Caribbean heritage and all pupils. The gap is now 7.8 points with the average Attainment 8 score rising from 34 to 39 points, the equivalent of half a GCSE grade in each of the student's eight subjects. This improvement is following the first year of the Schools Forum commissioned Raising the Achievement of British Boys of Black Caribbean Heritage in Brent Schools programme. However despite the improvement, the target of 7 points was marginally missed and this KPI has an Amber RAG rating. The current second year of the programme will be doing further work in secondary schools, supporting the role of Black Caribbean Achievement Champions in secondary schools, holding follow-up sessions to evaluate progress and setting school specific actions to reduce the gap, to secure a greater improvement in GCSE outcomes for this group of boys.

- 3.6 There are two indicators focusing on the number of Fixed-Term Exclusions for Boys of Black Caribbean Heritage (BBCH), one each covering primary school and secondary school. This academic year there have been 71 secondary fixed term school exclusions for BBCH compared to a target of 130, earning a Green rating for this quarter. Although this group is still significantly overrepresented in exclusions overall, the count is well below the target threshold and lower than the equivalent period last year. The number of exclusions of BBCH in primary schools has a Red RAG rating, with 50 exclusions compared to a target of 28. The number of exclusions in the last few months has declined following targeted work to reduce this number, however BBCH still make up around 30% of the 165 primary Fixed-Term Exclusions in the academic year to date. Exclusion levels are monitored on a monthly basis, with Inclusion Support Officers undertaking targeted work to support individual schools.
- 3.7 71% of Boys of Black Caribbean Heritage have accessed the nursery education grant. The target for this KPI is 80%, so it has a RAG rating of Amber. 131 BBCH have taken up the entitlement this term, an increase of 34 from last term. Promotion and outreach work in person has been temporarily paused due to lockdown, but is continuing through website, social media and telephone enquiries to the team.
- 3.8 54% of care leavers are in education, employment or training (EET), earning an Amber rating, and falling slightly from 55% in the previous quarter. There is an increase in the number of individuals in EET but as the cohort is larger the percentage has fallen. Joint working with Prospects and other partnership organisations is ongoing to develop the range of support and opportunities available.
- 3.9 There are 12 LAC in Key Stages 3 and 4 with a fixed-term exclusion this academic year to date. This is an improvement on the equivalent period in 2019/20, attributable to more stable school places, training and collaborative working. It is not anticipated that there will be any further exclusions in this academic year due to ongoing COVID-19 school closures.
- 3.10 The percentage of 16-17 year olds who are not in education, employment or training is rated Green (Actual YTD 1.4%; Target YTD 1.4%). Joint working with Prospects is ensuring that all young people who are NEET are provided with information, advice and guidance and supported into education, employment and training.
- 3.11 The Brent Starts Achievement Rate continues to show strong performance and has achieved a Green RAG rating (Actual YTD of 93.7% against a target of 91%). Although in-person classes shut down in March due to COVID-19, continued engagement with learners is taking place online and across a variety of platforms. This has emphasised the need for further digital skills provision in the future. Current provision for digital skills is also rated Green, with 537 enrolments compared to a target of 476.
- 3.12 Brent Works Apprentice Outcomes performance has improved this quarter, increasing from seven apprenticeships in Q3 to 23 in Q4. This brings the year to date total to 60 against a target of 60, ranking this KPI Green. The Employment and Skills team are working closely with apprentices, employees

- and training providers to ensure everyone is engaged throughout the COVID-19 crisis.
- 3.13 There has been excellent performance with employment outcomes for Brent Works and The Living Room (Actual YTD 272; Target YTD 250), exceeding its target for the fourth quarter this year. A high proportion of the jobs facilitated are paid at the London Living Wage and are not on zero hour contracts. Recent recruitment has included roles for care workers, NHS 111 call handlers, and logistics work.

A future built for everyone, an economy fit for all

- 3.14 The number of new affordable homes delivered by Brent, registered providers and private developers is 242 compared to a target of 500, which receives a Red RAG rating. The annual target was set as an average of the total for the life of the plan, so homes not delivered this year will be added to the target for 2020/21. It was anticipated that completions would be lower in early years due to the time taken to start on site. 168 affordable properties are ready to be let in 20/21 when lockdown measures are lifted, with 48 confirmed for later in the year. The council also has 702 properties which have started on site, 148 with planning permission and 255 submitted for planning to the development pipeline is strong.
- 3.15 The timeliness of major planning application decisions continues to perform well above target (Actual YTD 97.6%; Target YTD 94%). 98.7% of decisions in Q4 were made within the agreed time period and performance has improved since the start of the year.

A cleaner, more considerate Brent

- 3.16 No additional electric vehicle charging points have been installed across the borough against a planned target of 85, rating this indicator Red. This is due to delay with the supplier, Source London, who had pushed the installation back to May 2020. This will be further delayed due to COVID-19.
- 3.17 The number of missed bin collections per 100,000 collections has a RAG rating of Red for the third quarter this year in a row (Actual YTD 21.2; Target YTD 20). Severe issues were experienced in July and August largely due to vehicle breakdowns and retaining HGV drivers. Veolia have since addressed this by hiring additional vehicles and members of staff. Q4 had a score of 17 missed bins per 100,000 collections compared to 101.5 at the peak in July.
- 3.18 Three additional indicators for Environmental Improvement have been rated Green:
 - Average time taken to remove illegally dumped waste (Actual YTD 0.55, Target – 1)
 - Number of kilograms of residual household waste collected per household (Actual YTD – 462, Target – 480)
 - Percentage of sites with unacceptable levels of litter (Actual YTD 7%, Target – 8%)

- 3.19 The percentage of children becoming subject to a Child Projection plan for a second or subsequent time is 13.8%. Although this has improved significantly from the 2018/19 outturn of 18.7% it is still above the 12% target and, therefore, receives a Red RAG rating. All cases with repeat registrations are being reviewed by Localities Service Managers and Child Protection Advisers to ensure that appropriate courses of action are being taken and that alternatives have been considered.
- 3.20 The reoffending rate by young offenders per cohort also receives a Red rating (Actual YTD 62.2%, Target 50%). This metric is very volatile due to a small cohort size, and the annual average is stable and hasn't exceeded 51.1% for the last five years. The Q4 cohort includes just 48 young people, of whom 28 went on to reoffend. Young people at a high risk of reoffending have received a higher number of contacts from the YOS this quarter, and practice is moving to a more effective trauma-based model.
- 3.21 All five of the indicators for Adult Social Care receive a Green RAG rating. Both new admissions to residential care homes for people aged 18-64 (Actual YTD 11, Target 28) and for those aged 65+ (Actual YTD 100, Target 149) are well below target. Demand for placements is increasing due to complexity of need, population increases and people living longer with increasingly complex conditions. Performance for the Reablement service, a key element of the demand management approach, also continues to show improvement. An actual YTD of 85.2% exceeds the 75% target and performance has risen continuously in each quarter this year. The YTD score of 0.9 average delayed transfers of care (DToC) also significantly exceeds its target of 6.5, and is well below the 2018/19 outturn score of 3.6. The improvement is due to the use of Home First, the handyperson scheme and Housing Hospital Service enabling residents to return to their home sooner.

Strong foundations

- 3.22 The measure More than 80% of website users can find what they are looking for online as measured by site survey (Actual YTD 57%, Target YTD 81%) continues to have a RAG rating of Red. Satisfaction has risen from 57% in Q1 to 60% in Q4, with responses in Q4 positive about how easy it was to find things and to understand the information provided, indicating the continual short-term improvements being made by the web team. People are still reporting issues and challenges when it comes to completing a transaction online and heavy usage areas such as parking and benefits continue to have the lowest satisfaction scores. The website redevelopment programme started in Q4 and work is being undertaken to understand how our residents sue the site currently, in order to provide insight for service improvement.
- 3.23 The Community Hubs have performed very well this year. 8,270 residents have accessed the hubs in 2019/20, rating this KPI Green. The original target of 3,900 was set when only two hubs were up and running and a rapid rollout of services means there are now four hubs operating, resulting in a significant increase in residents accessing the service. 80% of enquiries at the hubs have

been resolved at the point of contact, rising to 88% in Q4, so this KPI also has a Green rating.

Building a Better Brent - Wider borough plan indicators

Every opportunity to succeed

- 3.24 The percentage of EHCPs issued on time has increased over this quarter. A number of different reasons can be a cause of delay in finalising plans, including parents missing appointments with medics, parents wanting more time to consider their options and delays in receiving professionals' advice. SENAS will continue to make improvements in efficiency and communication with associated professionals involved in assessments, in response to the increasing number of EHCPs. The new EHCP co-production workstream reporting into the Children's Trust is already delivering better partnership working and more timely inputs into EHCPs.
- 3.25 19 children and young people applying for a school place in year 7, 8, 9, 10 and 11 were not offered a place within four weeks. The target for this indicator is 0 so it receives a Red rating. In January, seven children did not receive an offer within four weeks due to an administrative delay over the Christmas holiday period. In March 12 year 10 and 11 children were not offered a place within four weeks due to the impact of COVID-19 delaying the offer process. The Admissions Team has amended the offer process to ensure that going forward, children are offered a place within 4 weeks.
- 3.26 The percentage of Brent pupils attending a good or outstanding school has remained at 96% in Q4 and receives a Green rating. During Q4, Ofsted inspected East Lane Primary School for the first time and it was judged outstanding; however, it is a small school and due to the number of pupils attending this school it does not increase the overall percentage. Six further schools were inspected in the period and retained their previous rating, five of which were good and one was outstanding. All secondary schools in Brent are rated good or outstanding.
- 3.27 Three further indicators for this priority have performed strongly and have been rated Green:
 - Number of primary school permanent exclusions (Actual YTD 0, Target 0)
 - Number of secondary permanent exclusions within Brent schools (Actual YTD – 19, Target – 31)
 - Number of LAC with a permanent exclusion (Actual YTD 0, Target 0)

A future built for everyone, an economy fit for all

3.28 The percentage of relevant contracts being procured that follow the Brent LLW policy (Actual YTD – 95%, Target – 99%) receives a Red rating. Performance in the latter half of the year reached the target of 99%, but this wasn't enough to improve from 91% in quarters 1 and 2. An ongoing review of the contracts register database has resulted in the increase in the number of valid LLW compliant contracts. The three remaining KPIs for Procurement, all of which

- related to the inclusion of local businesses in the tender process, have received a Green rating.
- 3.29 The average re-let time with major voids has been rated Amber (Actual YTD 74, Target 72), and minor voids have been rated Red (Actual YTD 43, Target 21). In both cases performance significantly declined from Q3 to Q4, increasing from 26 days to 114 days for major voids and 14 to 50 for minor. Targets are based on top quartile performance for our peers although the level of works carried out by each organisation is not necessarily similar. Targets for 2020/21 will be reviewed in order to reflect of the extensive refurbishment works that Brent undertakes in order to provide our residents with the highest quality homes.
- The number of households in temporary accommodation (Actual YTD 2,132, Target 2,000), and the number of households in emergency B&B accommodation (Actual YTD 101, Target 30) have both risen in Q4 and are rated Red. This is due to the impact of COVID-19, which has caused a suspension in social letting, a reduction in private sector letting and an increase of B&B accommodation for rough sleepers and single homeless people. It is anticipated that there will be a backlog of social housing relets when lockdown is lifted, and 70% of these will be allocated to households in temporary accommodation.
- 3.31 There are 4,114 selectively licensed properties against a target of 9,000, giving this KPI a Red rating for Q4. This is compared to 8,804 licensed properties in Q3, with the fall coming after MHCLG rejected the application to extend selective licencing across the borough. Only five wards in the borough are covered by selective licensing and we estimate that the scheme has 94% coverage.

A cleaner, more considerate Brent

3.32 Waste disposal tonnage continues remains Red rated for Q4 (Actual YTD – 69,269, Target – 61,269). The increase in tonnage is reflected by nationwide trends and borough-wide property growth. The cost for disposal of tonnage in excess of the contract target is met by the Public Realm contractor Veolia so waste minimisation remains a key driver for them. 2019/20 has seen a focus on Recyclopedia, a database of recycling solutions for different materials. An LWARB project was completed focussing on targeted contamination work on a London-wide basis and a West London Waste Authority project ran from late January to March, aimed at increasing the use of the food waste collections.

A borough where we can all feel safe, secure, happy and healthy

3.33 There were 768 cultural events held in libraries and museums this year,50% above the target of 515 and earning a Green rating. There was a significant decline in the number of attendees to events in Q4, leading to many events being cancelled due to the onset of COVID-19. The number of active borrowers is rated Amber with 34,676 users at the end of Q4 against a target of 35,592. 2019/20 saw 1.68 million visits to Brent's sports centres, earning it a Red rating against a target of 1.79 million. There was a significant reduction in use throughout February and March ahead of the centres' closures due to COVID-

- 19. It is estimated that performance would have been Amber were it not for March's closures. Centres are working on their reactivation plans for when they are able to open again.
- 3.34 Both Public Health indicators receive a green rating, with 96.2% of new birth visits taking place within 14 days (Target 95%) and there all 8.09% of successful completions for all opiate drug users in treatment (Target 5.68%). This data covers until the end of February 2020 due to a delay in reporting from PHE and it may be that there is a decline because of COVID-19; however many drug intervention services such as one to one support and outreach work are still running at Willesden Centre for Health and Care and Cobbold Road.
- 3.35 29.8% of S47s completed led to an initial Child Protection Conference, very slightly below the 30% target and making this KPI Amber. This is an improvement on the 2018/19 outturn and staff at Brent Family Front Door are working to ensure the threshold for referrals is maintained consistently.
- 3.36 15.3% of Looked After Children have had three or more placement moves. This has a RAG rating of Red as the target was 12%. Changes to the tracking process have been implemented to better identify temporary placements. This will allow for increased monitoring and support for the young people with complex needs experiencing placement changes.

Strong foundations

- 3.37 The two indicators reporting Stage 2 complaints have a RAG rating of Red. The target for all complaints KPIs is a 100% response rate within the timescale, and corporate Stage 2 complaints had an 86% rate while statutory complaints have a 43% rate. This is a decline from 2018/19. The low rate for statutory complaints is due to a n increase in case volume and complexity, and training on CYP complains is being provided to improve on the number of Stage 1 complaints that are escalated. A mid-year transition from iCasework to the new Complaints Management module within the CRM means that data for the other complaints KPIs is not available for reporting.
- 3.38 Performance is below target for the collection of both Council Tax and Non-Domestic Business Rates (Council Tax Actual YTD 96.0%, Target YTD 96.1%; NNDR Actual YTD 98.2%, Target YTD 99%) and both are rated Amber. Cash payments for Council Tax were affected due to COVID-19, and the NNDR rate may be revised due to the retail relief being provided.
- 3.39 The value of Housing Benefits overpayments recovered (Actual YTD £8.63m, Target YTD £9.3m) remains Red this quarter. Progress has been difficult this year due to the wider implementation of Universal Credit. This is another service area heavily affected by COVID-19 and the council is responsive to hardships residents may be facing, with officers handling requests for deferment or cessation of deductions on a case by case basis.
- 3.40 Current rent collected as a percentage of rent due is at 98.6%, 0.9% below target and rated Amber. A number of new initiatives are planned for 2020/21 to ensure that rent arrears from previous years are captured. The new CRM module is due to launch in the summer and this will allow a more targeted

approach to arrears management. The rent collection rate is the same for households on Universal Credit and as it is for other households, which is very good as this was considered to be a risk. The team have supported households on Universal Credit to prioritise their rent payments and in many cases have it paid directly to the Housing service.

- 3.41 51% of Housing Management calls were answered within three minutes. This KPI has a target of 80% and is rated Red. Introduction of new software systems and the time they take to interact with each other, as well as an increase in the complexity of cases and a need for input from other teams, has led to an increase in call handling time. The contact centre also makes as many outbound calls as it receives and this limits staff time to answer the inbound calls within three minutes. The service remains focused in prioritising good call outcomes as well as considering call waiting times.
- 3.42 74.36% of invoices were paid on time, below the 80% target and earning a Red rating. The reason for delay is usually the late receipting of PO numbers and POs being raised retrospectively. The Accounts Payable improvement programme is identifying departments with slow performance.

4.0 Financial Implications

4.1 None

5.0 Legal Implications

5.1 In Table 3 of Part 3 of the council's constitution, it states that the Cabinet is responsible for formulating and preparing a sustainable community strategy and then submitting the same to Full Council for consideration and adoption or approval. The Sustainable Community Strategy constitutes part of the council's Policy Framework. The Council's Borough Plan 2019-23, which is its current sustainable community strategy, was agreed by Full Council in 2019.

6.0 Equality Implications

6.1 There are no direct diversity implications. However, the report includes performance measures related to the council's diversity objectives and is part of the framework for ensuring delivery of these key outcomes. Service areas have the responsibility for managing the delivery and performance of their services. Therefore, the service area would also need to consider if a variation in performance could lead to equality implications at a service level.

7.0 Consultation with Ward Members and Stakeholders

- 7.1 Not applicable.
- 8.0 Human Resources/Property Implications (if appropriate)
- 8.1 None

Report sign off:

Shazia Hussain

Assistant Chief Executive



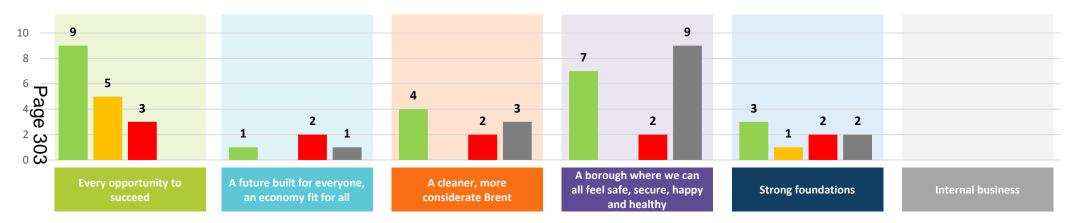


Cabinet - Corporate Performance Report June 2020 Borough Plan Performance Summary – Quarter 4 (January 2020 to March 2020)

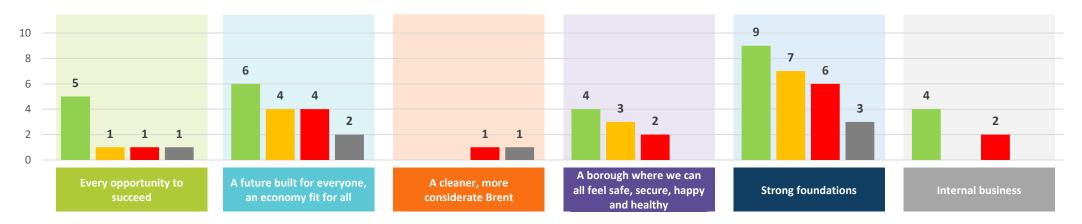
All KPIs



KPIs for the Year 1 Delivery Plan



KPIs for Borough Plan Service Delivery Priorities





Cabinet - Corporate Performance Report June 2020 Borough Plan Performance Summary – Quarter 4 (January 2020 to March 2020)

Key for Performance Tables (all priorities)

Unless otherwise defined, performance information is assessed using the following tolerances to give a RAG rating:

Green		At target or exceeding target	
Amber	Amber 0.01% - 5% outside target*		
Red		Greater than 5% outside target*	
Contextual		No target set	
n/a		Data not available	

*please note some indicators are set at a 10% tolerance due to national requirement

The KPIs covering the Borough Plan service delivery priorities also have an indicator to show how the KPI is performing against target compared to the previous quarter:

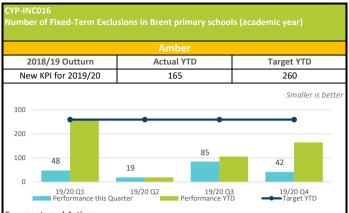
A	Performance has improved since previous quarter
_	Performance is the same as previous quarter
▼	Performance has declined since previous quarter
	Data for previous quarter not available



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rear 1 Denvery rian	A borough where we can all feel safe, secure, happy and healthy	11
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Improvement in Key Stage results for boys of Black Caribbean heritage



Comments and Actions

Cllr Mili Patel

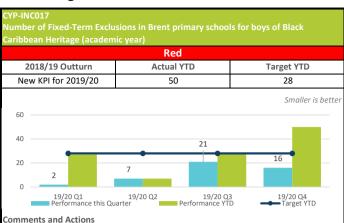
Comments: This indicator is currently on trajectory to meet the target for the academic year. However, as there is a time lag in receiving exclusions data from schools, this number could increase.

Actions: Continue to use monthly exclusions reports to challenge schools on repeated exclusions of all vulnerable groups including boys of Black Caribbean heritage and children with SEND. Inclusion Support Officers will continuing to advise headteachers of alternatives to permanent exclusions.

Lead Member: Strategic Director: Cllr Mili Patel Gail Tolley

2018/19 Outturn Actual YTD Target YTD New KPI for 2019/20 639 1.200 Smaller is bette 1.000 500 301 265 240 44 19/20 Q1 19/20 Q2 19/20 Q3 Performance this Quarter Performance YTD Comments and Actions Comments: There has been a significant reduction in numbers of fixed term exclusions in Brent secondary schools during this academic year and Brent is on track to meet the target. However, as there is a time lag in receiving exclusions data from schools, the number could increase. Lead Member: Strategic Director:

Gail Tolley



Comments: There have been 50 fixed term exclusions since September 2019. However, the last quarter shows a decline in the number of exclusions each month indicating that targeted work to reduce exclusions for BBCH is having an effect. As there is a time lag in receiving exclusions data from schools, this number could increase.

Actions: The number of FTEs will continue to be monitored in Brent primary schools for BBCH on a monthly basis. Inclusion Support Officers will continue to undertake targeted work to support individual schools.

Lead Member: Strategic Director: Cllr Mili Patel Gail Tolley

CYP-INC020 Number of Fixed-Term Exclusions in Brent secondary schools for boys of Black Caribbean Heritage (academic year) Green 2018/19 Outturn Actual YTD Target YTD New KPI for 2019/20 71 130 Smaller is bet



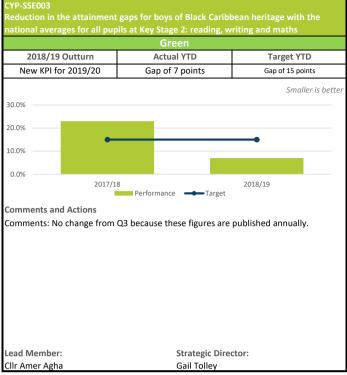
Comments and Actions

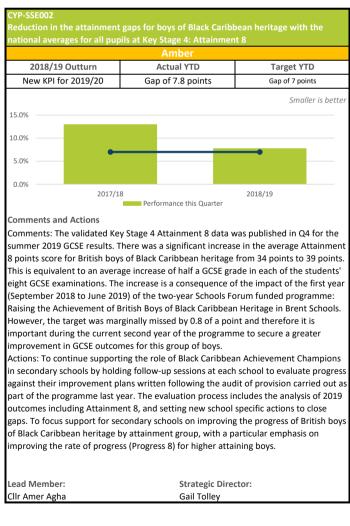
Comments: The numbers of Fixed Term Exclusions in Brent secondary schools for BBCH are lower than at this time last year. BBCH are still significantly over represented in exclusions overall. There is a time lag in receiving exclusions data from schools, so this number could increase.

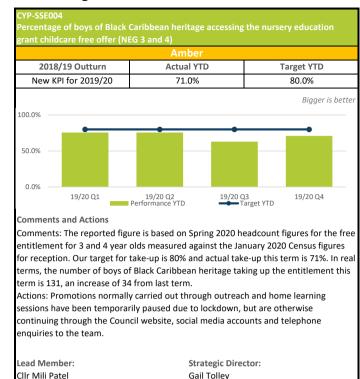
Actions: Numbers of fixed term exclusions in Brent secondaries for BBCH are monitored on a monthly basis and Inclusion Support Officers are undertaking targeted work to support individual schools.

Lead Member: Strategic Director:
Cllr Mili Patel Gail Tolley

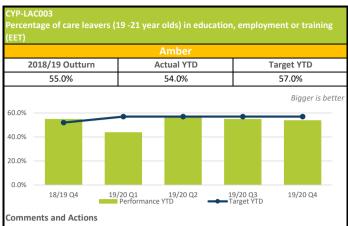
Improvement in Key Stage results for boys of Black Caribbean heritage







Improvement in Key Stage results for looked-after children and care leavers



Comments: There are more care leavers in EET compared to 18/19 outturn. However, as there are more care leavers aged 19-21 in 19/20 than the previous year, the percentage is lower.

Actions: Joint working with partners including Prospects is on-going to improve opportunities for EET.

Lead Member: Strategic Director: Cllr Mili Patel Gail Tolley

2018/19 Outturn Actual YTD Target YTD New KPI for 2019/20 20% 35% Bigger is bette 40.0% 30.0% 20.0% 10.0% 0.0% 2017/18 2018/19

Comments and Actions

Comments: This is an annual measure.

Actions: Given the current situation with regards to Covid 19, school closures and the government announcement in relation to the cancellation of all summer public exams there is uncertainty around how levels will be awarded. The government has also suspended league tables for this year: although VS is maintaining contact with CYP and schools are setting work, there is a risk to LAC attainment at all key stages this

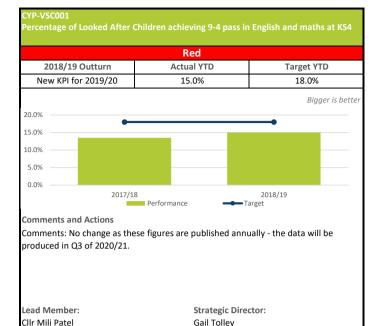
Lead Member: Strategic Director:

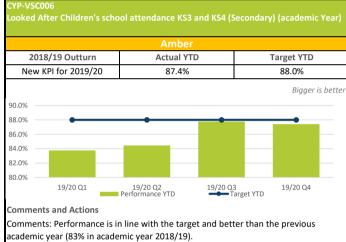
Cllr Mili Patel Gail Tolley						
CYP-VSC013 Number of looked after chil Year)	dren with a Fixed-Term Exclu	sion KS3 & KS4 (academic				
	Green					
2018/19 Outturn	Actual YTD	Target YTD				
New KPI for 2019/20	12	20				
20		Smaller is better				
19/20 Q1	19/20 Q2 Performance YTD 19/20 Q3	3 19/20 Q4 arget YTD				
Comments and Actions Comments: The number of LAC of secondary age with a fixed term exclusion is						

currently 12, which is significantly below this time last year. More stable school places, training and guidance and collaborative working has contributed to this improved

Actions: Given the current situation with regards to Covid-19 and school closures it is highly unlikely that there will be any further exclusions for the current academic year. VS will continue to work with schools and carers to ensure educational stability.

Strategic Director: Lead Member: Cllr Mili Patel **Gail Tolley**



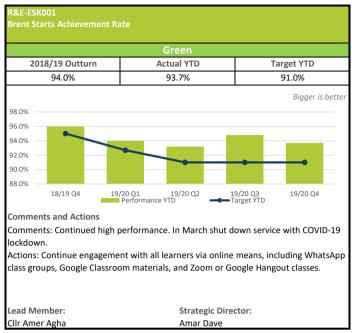


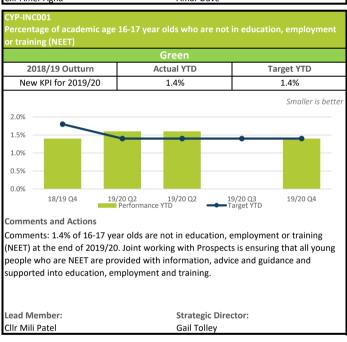
Actions: Regular meetings are held between Virtual School and LAC and Permanency service managers to analyse data and put joint strategies in place, including the attendance policy being actioned by individual schools. Children's attendance is discussed to develop individual interventions on a case by case basis.

Lead Member: Strategic Director: Cllr Mili Patel Gail Tolley

Cllr Amer Agha

High-level skills achievement





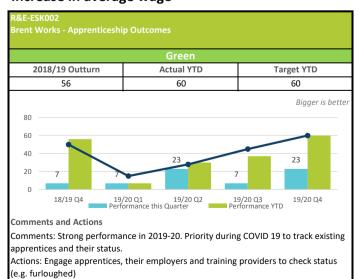
Green 2018/19 Outturn Target YTD 350 537 476 Bigger is bette 400 200 19/20 Q3 Target YTD 19/20 Q1 19/20 Q2 19/20 Q4 **Comments and Actions** Comments: Continued growth of digital skills classes. Actions: Response to COVID-19 requires engagement with learners via digital platforms and emphasises the need for digital skills provision in future. Lead Member: Strategic Director:

Amar Dave

Increase in average wage

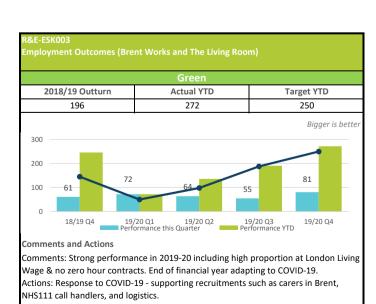
Lead Member:

Cllr Amer Agha



Strategic Director:

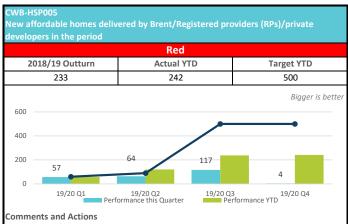
Amar Dave



Page 309mber: Strategic Director: Amar Dave

A future built for everyone, an economy fit for all

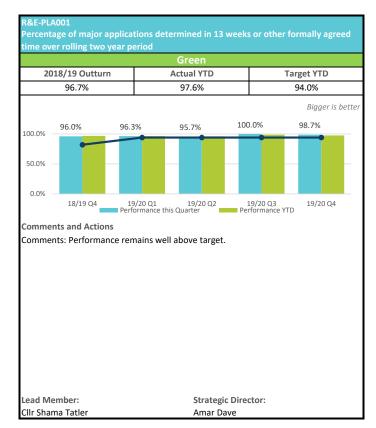
Increase in housing supply



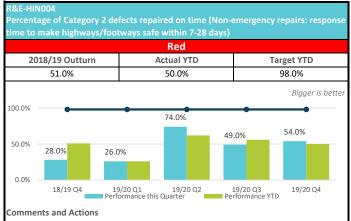
Comments: The original target was an average taken over the life of the plan and it was to be expected that in the early years the numbers achieved would be lower given the time taken for building to start on site. The Council's building programme is on track, however funding issues have delayed some registered providers programmes which has impacted figures for 19/20. There are currently 168 affordable properties being let, which were held due to lockdown measures, and a further 48 confirmed for later in 20/21. The Council building pipeline is steady and there are currently 702 properties where building has commenced on site, a further 148 in planning permission and 255 submitted for planning. We are working with Registered Providers to understand their pipelines for the coming years.

Actions: The 20/21 target will be updated to include homes not delivered in 19/20 in addition to the planned programme.

Lead Member: Strategic Director: Cllr Eleanor Southwood Phil Porter



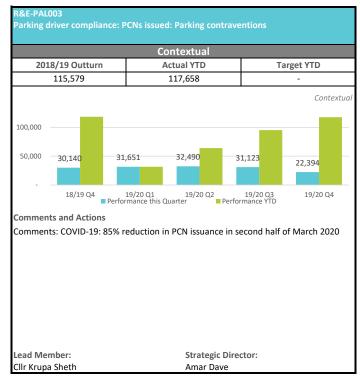
Keep traffic moving and roads and pavements in good repair



Comments: Figures are low due to buildup of backlog over the previous quarter include in January report. On their own performace over each month was Jan 22%, Feb 74% Mar 65%. This does not include repairs listed as late (outside 7-28 days target) but completed within the month, if included the performance is Jan 93%, Feb 91% Mar 96% giving a score of 93% for the quarter.

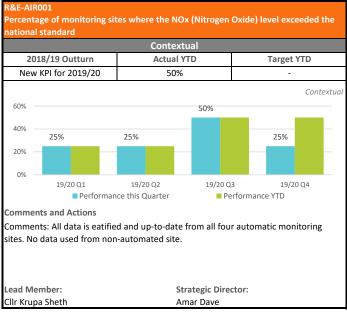
Actions: Agree actions with contractor for improving late repairs and reporting. A number of repairs completed on time are not recored correctly so classified as late (insufficient informaiton) whilst a number of 7 day repairs are late as they require repeat visits due to parked vehicles or located on sensitive streets (high traffic).

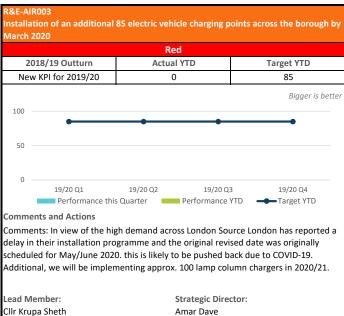
Lead Member: Strategic Director: Cllr Krupa Sheth Amar Dave



A cleaner, more considerate Brent

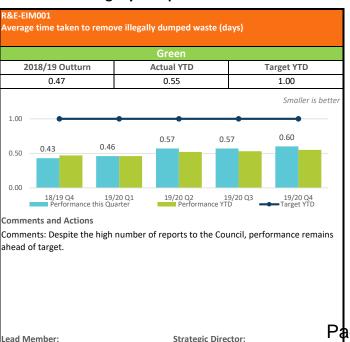
Improvement in air quality



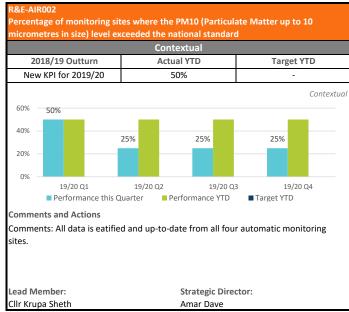


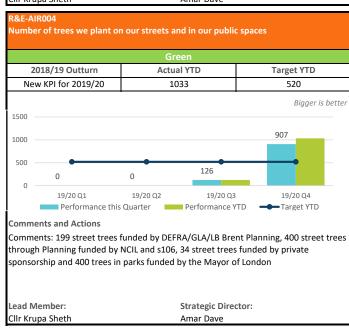
Reduction in illegally dumped rubbish

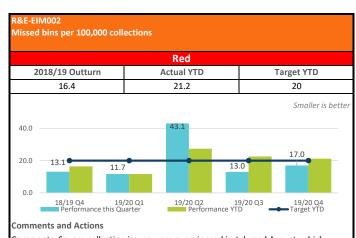
Lead Member: Cllr Krupa Sheth



Amar Dave







Comments: Severe collection issues were experienced in July and August, which resulted in a high level of missed collections. The issues were around vehicle breakdowns and retaining HGV drivers.

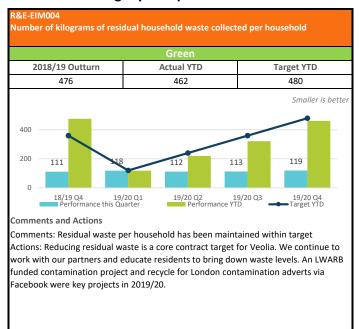
Actions: Veolia put measures in place to address the issues, including hiring additional vehicles to increase fleet resilience and working with recruitment colleagues to hire more permanent drivers. This strategy is working, as missed collections per 100,000 collections are back to normal levels after the peak of 101.5 in July.

Page 311 Lead Member: Strategic Director: 9 Cllr Krupa Sheth Amar Dave

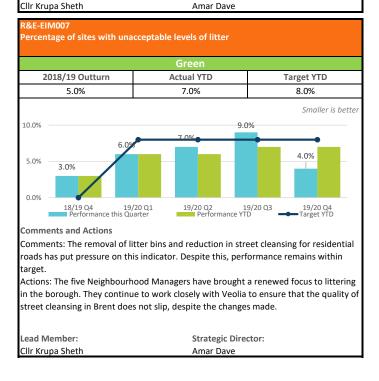
A cleaner, more considerate Brent

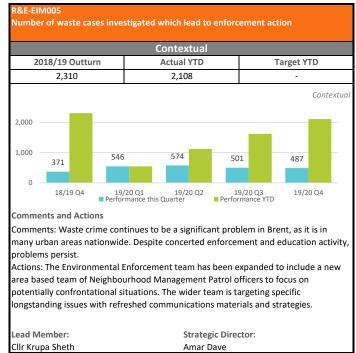
Reduction in illegally dumped rubbish

Lead Member:

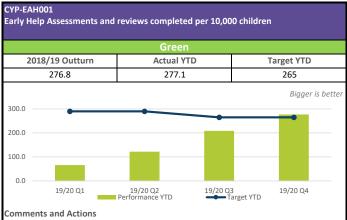


Strategic Director:





Reduction in anti-social behaviour, the risk of harm and re-offending

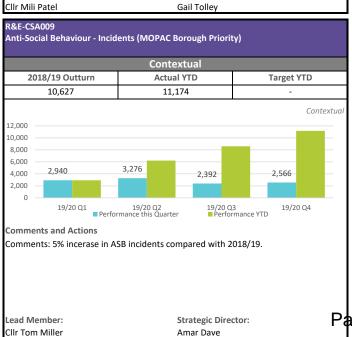


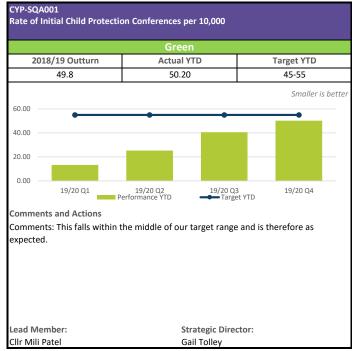
Comments: As projected, the number of Early Help Assessments (EHA) completed has increased and surpassed the target. The outturn of 277.6 is commensurate with last year's outturn of 276.8. Recruitment of temporary staff to address waiting lists followed by recruitment of permanent staff has had an impact on the rate of completion of EHAs. On-going training and support for partners completing EHAs has also had a positive impact, ensuring they not only complete higher numbers but also better quality EHAs.

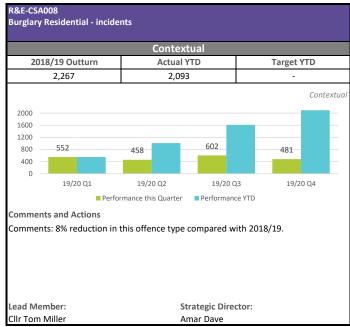
Lead Member: Strategic Director:

Cllr Mili Patel Gail Tolley CYP-SOA002 Percentage of children becoming the subject of Child Protection Plan for a second or subsequent time Red 2018/19 Outturn **Actual YTD** Target YTD 18.7% 13.8% 12.0% 20.0% 15.0% 10.0% 5.0% 0.0% 19/20 Q2 Performance YTD 19/20 Q3 Target YTD 19/20 Q4 Comments and Actions Comments: There has been a significant improvement in this figure with the percentage dropping from 18.7% to 13.8%. Actions: Locality Service Managers and Child Protection Advisers are reviewing all cases with repeat registrations to consider whether another course of action may be more appropriate.

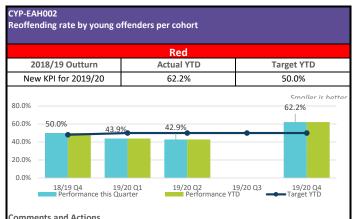
Lead Member: Strategic Director:





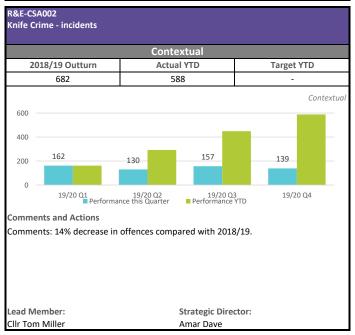


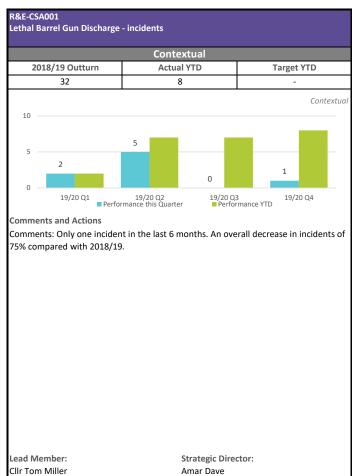
Reduction in violent crime, including gang and knife crime

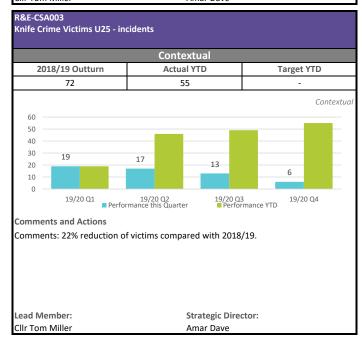


Comments: After three reporting periods where the rate has reduced, the last two reporting periods have seen an increase to 62.2%. The binary rate of reoffending is a very volatile indicator, particularly the use of the 3 month cohort which accentuates persistent reoffenders in a much smaller cohort. As the cohort decreases in size, slight changes in the numbers of reoffenders have a large effect on the reoffending rate. The current cohort is the smallest yet – comprised of just 48 young people of which 28 went on to reoffend. This compares to 52 young people in quarter 3, 26 of whom reoffended (50%). Despite the high rate this period, the annual averages present a much more stable picture, and demonstrate that the rate is probably better measured over a longer period. For the past 5 averaged years, the rate has not exceeded 51.1%. Actions: Young people at high risk of reoffending received a higher overall number of contacts from their YOS officers in Quarter 4. They also benefitted from increasingly trauma informed practice and a restructure of the YOS Management Team which has led to greater and more effective management oversight. Young people in the current reoffending cohort are contacted a minimum of once per day, increasing as is necessary in consultation with their line manager.

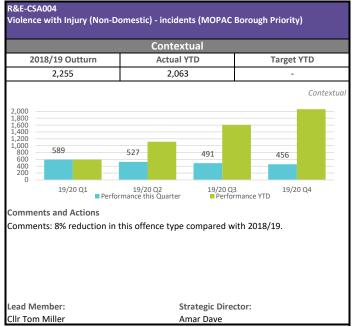
Lead Member: Strategic Director: Cllr Mili Patel Gail Tolley



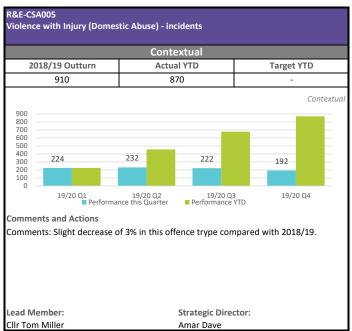




Reduction in violent crime, including gang and knife crime

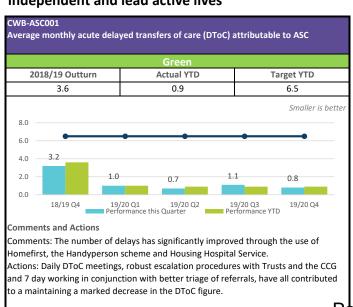








Support our most vulnerable adults, enabling them to choose and control the services they receive, remain independent and lead active lives



Strategic Director:

Phil Porter

ead Member:

Cllr Harbi Farah

New admissions to residential & nursing care homes, 18-64 2018/19 Outturn Actual VTD Target YTD 11 28 Smaller is bette 30 10 2 Ω 18/19 Q4 19/20 Q1 19/20 Q2
Performance this Quarter 19/20 Q3 Performance YTD Comments and Actions

Comments: The demand for placements continues to increase. This is due to a number of factors, such as increasing complexity of need. To encourage alternative provision a challenging target is set.

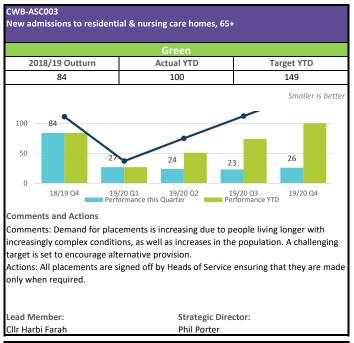
Actions: All 18-64 placements are signed off by Helen Woodland, ensuring they are made only when it is necessary. This is usually due to a safeguarding concern.

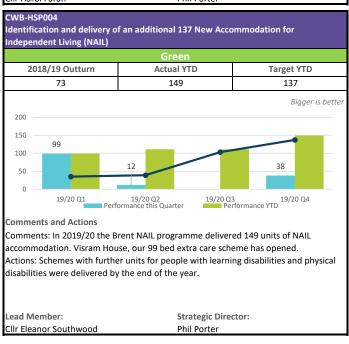
Page 315 Lead Member:

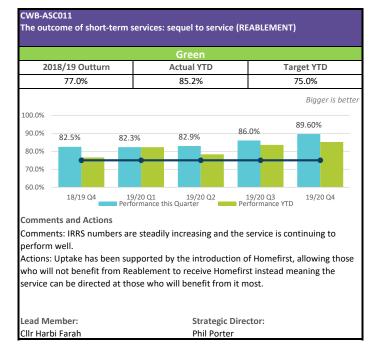
Cllr Harbi Farah

Strategic Director: Phil Porter

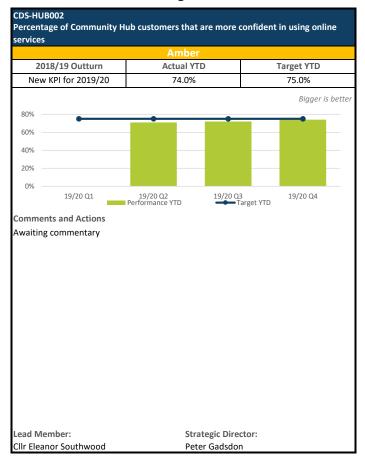
Support our most vulnerable adults, enabling them to choose and control the services they receive, remain independent and lead active lives

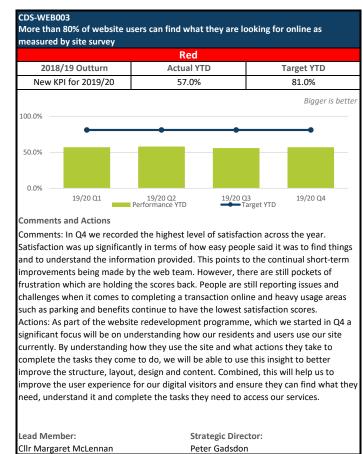




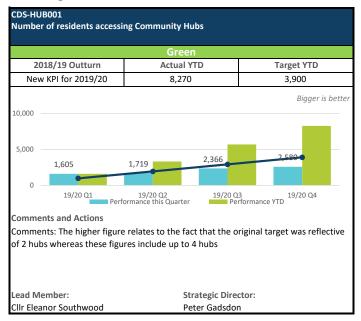


Enable more residents to get online

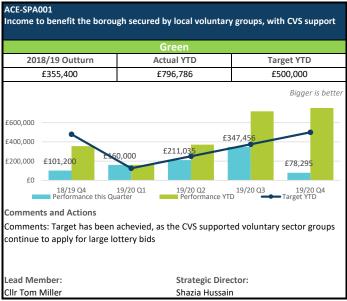


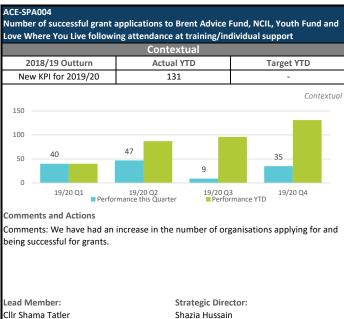


Building services around residents and their needs

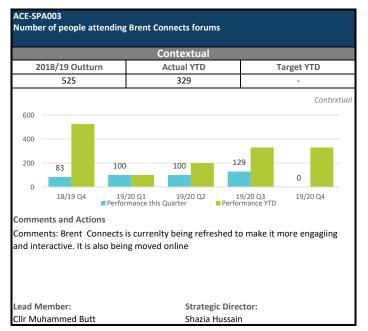


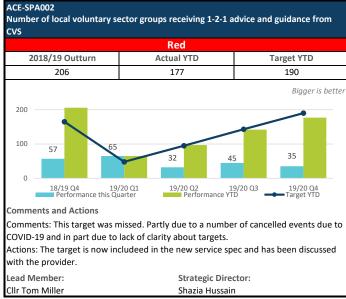
Increase in resident satisfaction

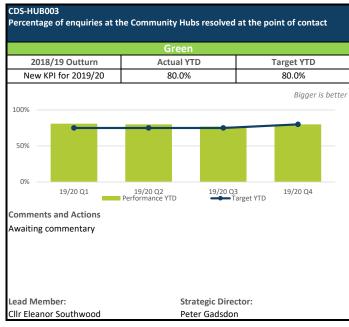




Increase in resident involvement







Every opportunity to succeed

				/				/			
	CEX-HRE002				Comments & Actions		CYP-CPA00	J9			Comments & Actions
	Number of apprenticeships in the Council				Comments: We have a consistent number of Apprentices within the Council and this is reflected in the data.			or training (EET) (Year 12 and 13)			Comments: The data for this KPI is produced annually and will be available in 2020/21 Quarter 2. A post-16 worker within the Virtual School team is providing tailored support for vulnerable LAC.
	YTD		50				YTD	8	1.0	%	
	Q1	33	Q2	44			Q1	77%	Q2	81%	
	Q3	51	Q4	50			Q3	81%	Q4	81%	
				Contextual			Target Y			Bigger is better	
	New KPI for 2019/20						New KPI	for 2019/20			
Cllr Mar	r Margaret McLennan Debra Norma										Gail Tolley
	CYP-INC003 Comments & Actions							CYP-INC007 Comments & Actions			

Number of permanent primary exclusions

Q2

within Brent Schools

New KPI for 2019/20

2

YTD

Q1

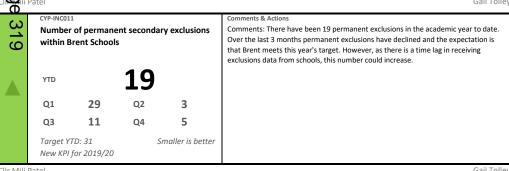
		tage of EHCPs ing exceptions		1 20 weeks	Comments & Actions Comments: The percentage of EHCPs issued on time has increased over this quarter. The YTD 79.8% is based on figures from September (as this KPI is measured by academic year). This is in the context of a rising number of EHCPs being issued. A number of different reasons can cause a delay in finalising plans, including parents		
	YTD	79	9.8	%	missing appointments with medics, parents wanting more time to consider their options and delays in receiving professionals advice. Actions: SENAS will continue to make improvements in efficiency and communication		
Ť	Q1	87%	Q2	78%	with associated professionals involved in assessments, in response to the increasing number of EHCPs. The new EHCP co-production workstream reporting into the		
	Q3	86%	Q4	85.10%	Children's Trust is already delivering better partnership working and more timely		
Pa	Target YTD: 90% Bigger is better New KPI for 2019/20				inputs into EHCPs.		
CI GO III I	Patel				Gail Tolley		

Q3 0 Q4 0 Target YTD: 0 Smaller is better New KPI for 2019/20 Gail Tolley Cllr Mili Patel

position could change.

Comments: There have been no primary school Permanent Exclusions in Q4 (Spring

Term). However, as there is a time lag in receiving exclusions data from schools, this



Comments: A short administrative delay over the Christmas holiday period led to 7 Number of CYP applying for Year 7, 8, 9, 10 & children not receiving an offer within 4 weeks in January 2020. A Choice and Fair 11 (ages 11-16) not offered a school place Access Interview session for new arrivals in Years 10 and 11 scheduled for 16 March within four weeks was cancelled due to the host school's concern about COVID-19. It was rearranged for 24 March, but cancelled again following the Government's announcement on schools YTD opening from 23 March. This resulted in 12 Year 10 and 11 children not being offered a school place within 4 weeks. Actions: The Admissions Team has amended the offer process to ensure that children Q1 Q2 0 are offered a place within 4 weeks. Q3 Q4 19 Target YTD: 0 Smaller is better

0

Gail Tolley Gail Tolley Cllr Mili Patel Cllr Amer Agha CYP-SSE001 Comments & Actions

C11-22F001				Comments & Actions
	judged as be	_	Brent schools good or	Comments: The target continued to be exceeded in Q4 by one percentage point. There were seven Ofsted inspection reports published during the quarter. Of these, one school, East Lane Primary School was inspected for the first time and was judged outstanding. However, the numbers attending the school are not large enough to increase the overall percentage. The other six schools retained their previous judgements: Queen Park Community School, St Mary's Catholic Primary School, Our Lady of Lourdes RC Primary School, ARK Franklin Primary School and Chalkhill Primary
YTD	90	6.0	%	
Q1	94%	Q2	94%	School all remained good; and Manor School remained outstanding.
Q3	96%	Q4	96%	
Target YTD: 95% Bigger is better New KPI for 2019/20				

Number of looked after children with a Comments: Partnership work with schools and advocacy for students at risk of permanent exclusion has ensured that the permanent exclusion figure has remained Permanent Exclusion (academic year) YTD Q1 Q2 0 Q3 Q4 0 Target YTD: 0 Smaller is better New KPI for 2019/20

A future built for everyone, an economy fit for all

Comments: The on-going review of the contracts register database continues to result Percentage of tenders in which local Comments: The procurement team have now formally incorporated the inclusion and Percentage of relevant contracts being in the increase in the number of valid LLW compliant contracts. invitation of local suppliers into all future procurements where appropriate. procured that follow the Brent London Living businesses were invited Frameworks have been excluded for this calculation, because the Suppliers are Wage policy predetermined and do not include local businesses. YTD YTD 91% Q1 100% Q1 99% 99% Q3 50% 60% Q3 Target YTD: 99% Bigger is Better Target YTD: 70% Bigger is Better 18/19 Outturn: 99% New KPI for 2019/20 Cllr Margaret McLennan Peter Gadsdon Cllr Margaret McLennan Peter Gadsdon Percentage of such tenders local businesses were successful Comments: Procurement will look to maintain performance. Comments: The procurement process now has the inclusion of specific questions that Percentage of tenders in which local in, either outright in being awarded the contract or used will establish the levels of local business supply chain to be utilised. businesses were invited and then within the supply chain of the non-local business participated YTD 33% 01 33% 67% Q1 0% 100% 100% Q3 0% 50% Q3 Target YTD: 30% Target YTD: 30% Bigger is Better Bigger is Better 18/19 Outturn: 0% 18/19 Outturn: 24% Cllr Margaret McLennan Peter Gadsdon Cllr Margaret McLennan Peter Gadsdon Comments & Actions Comments & Actions Comments: The 72 day turnaround target is based on top quartile performance Comments: The 21 day turnaround target is based on top quartile performance Average re-let time for properties with major Average re-let time for properties with minor against our peer group, however works carried out across the sector are not always against our peer group, however works carried out across the sector are not always voids works (calendar days) voids works (calendar days) similar. Our approach with voids works is to carry out full works and repairs to the similar. Our approach with voids works is to carry out full works and repairs to the property while it is empty. We spend a lot of money on refurbishing properties in the property while it is empty. We spend a lot of money on refurbishing properties in the voids period which takes more time. This is the approach we as an organisation have voids period which takes more time. This is the approach we as an organisation have YTD decided to take forward and therefore target set for 20/21 will be reflective of these decided to take forward and therefore target set for 20/21 will be reflective of these priorities. 80 53 29 26 Q1 Q1 Q2 26 114 Q3 14 50 Target YTD: 72 Smaller is better Target YTD: 28 Smaller is better 18/19 Outturn: 37 18/19 Outturn: 89.5 Cllr Eleanor Southwood Cllr Eleanor Southwood Phil Porter

Comments & Actions Comments: 100% of the Fire Risk Assessment actions required during the year have Comments: 100% compliance. Fire Risk Assessment - Recommended actions Percentage of properties with a valid Fire Risk been completed. We have also commissioned an ongoing programme of Personal for blocks over six storeys high Assessment, in line with cyclical date for re-Emergency Evacuation Plans (PEEPs) checks for residents living in High Rise Blocks inspection which began in the last quarter of the year. So far 167 individuals living in general needs council homes have been identified as requiring a PEEPs to be completed. 100.0% YTD YTD Actions: The team are currently working with suppliers and MHCLG to mitigate the impact of shortages of materials that will impact our ability to maintain actions in a timely fashion going forward. PEEP completions will be monitored locally on a monthly 100% 93.6% 01 100% 100% 01 basis to maintain programme. Q3 94.2% 100% Q3 100% 100% Target YTD: 100% Bigger is better Target YTD: 100% Bigger is better 18/19 Outturn: 100% 18/19 Outturn: 100%

Phil Porter Cllr Eleanor Southwood Cllr Eleanor Southwood

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Percentage of properties with a valid gas Comments: At the end of March there were 101 properties out of compliance. These Number of households (families & singles) in Comments: The rise in TA use is due to the impact of the COVID-19 lockdown, are being progressed by the gas safety team liaising with other services to gain safe specifically the combination of a suspension of Social Lettings and reduction in Private certificate Temporary accommodation (TA) entry into the properties respecting sensitivities due to shielding and self isolation. In Rented sector Offers (PRSO) and an increased use of Bed and Breakfast for rough the short term we are not taking legal action to gain access to these properties but are sleepers and single homeless people. The Council has lowered statutory thresholds to keeping detailed records of access attempts. protect the most vulnerable, reduce transmission risk, minimise impact on NHS and 98.72% Actions: Access procedures have been adapted during this time and we are gaining YTD other essential services, and prevent high mortality. YTD access to properties where we can to carry out checks. Actions: The supply of new build Social Housing is currently being forecast as part of the 2020/21 Lettings Plan. There will also be a backlog of relets in social housing 2,075 99.69% Q1 Q1 2,037 available following the COVID-19 lockdown, 70% of which will be allocated to homeless households in TA which will help to decrease numbers. 99.80% Q4 98.72% Q3 2,097 2,132 Q3 Target YTD: 100% Bigger is better Target YTD: 2,050 Smaller is better 18/19 Outturn: 99.4% 18/19 Outturn: 2,191 Cllr Eleanor Southwood Phil Porter Cllr Eleanor Southwood Number of households in non-self-contained Comments: This increase in the use of Bed and Breakfast accommodation is a result of Percentage of homelessness prevented and Comments: The percentage of homelessness applications either prevented or relieved providing emergency accommodation for rough sleepers and single homeless people remains above target. This has been achieved through a combination of the Find Your Bed & Breakfast (B&B) relieved Home Initiative, Family and Landlord mediation, as well as the SHPS service. during the COVID-19 pandemic. Actions: The Housing Needs Team is working to increase supply of accommodation for single people to move them on from B&B. YTD YTD Q1 79 25 Q1 54% 72% 101 Q3 56% 51% Q3 62 Taraet YTD: 30 Smaller is better Taraet YTD: 50% Biager is better 18/19 Outturn: 121 18/19 Outturn: 55% Phil Porter Phil Porter nor Southwood Cllr Eleanor Southwood R&E-PAL001 Comments & Actions Comments: MHCLG rejected our application to extend selective licensing in the Comments: Increased driver compliance throughout the year. COVID-19: 60% Number of selectively licensed properties Parking driver compliance: PCNs issued: CCTV Borough. This means that the number of wards covered by selective licensing is now 5. reduction in second half of March 2020. bus lane Actions: Surveys will identify additional locations for bus lane enforcement for We estimate that within those 5 wards there are 4360 properties that require a installation in 2020/21. selective licence we currently therefore have 94% coverage. Actions: Target to be revised down to 4,400. 9,365 Q1 8,605 Q1 3,015 857 8,804 4,114 2,928 Bigger is better Contextual Target YTD: 9,000 18/19 Outturn: 8.124 18/19 Outturn: 10.968 Cllr Eleanor Southwood Cllr Krupa Sheth Amar Dave Comments & Actions

		ance: PC	Ns issued: CCTV	Comments & Actions Comments: Increased driver compliance throughout the year. COVID-19: 60% reduction in second half of March 2020. Actions: 11 additional locations have been identified for camera installation during 2020/21.
YTD	56	5,5	69	
Q1	15,780	Q2	16,514	
Q3	13,463	Q4	10,812	
			Contextual	
18/19 (Outturn: 62,890			

Comments: Rolling two-year above target. 2019-20 full year figure fell marginally Percentage of non-major (minor and other) below target (by 0.17 %) applications determined in eight weeks or other formally agreed time over rolling two

Actions: Ensure higher level over next year to maintain rolling two year over next financial year.

Target YTD: 86% Bigger is better 18/19 Outturn: 89.54%

87.24%

YTD Q1 Q3

88.75%

A cleaner, more considerate Brent

Number of illegally dumped waste incidents reported on public land (large and small)

93 7.522 94 8.466

18/19 Outturn: 26,717

Comments & Actions

Comments: Continued promotion of the Cleaner Brent app and the use of Veolia's technology and reporting via the contact centre have kept levels of reporting on the increase. This is positive as it ensures illegal waste dumping is removed quickly. Actions: Area based Neighbourhood Managers and Enforcement Officers continue to tackle the issue of illegal rubbish dumping. 20 community skip days took place across Brent in 2019/20 as well as introducing a refreshed version of campaign materials targeting illegal dumping.

R&E-EIM008

Residual waste disposal tonnage - Public Realm Contract Target 1

69,269
17,799
17,383
17,344
16,743

Target YTD: 45,970 Smaller is better 18/19 Outturn: 67,357

Comments & Actions

Comments: The above target waste tonnages reflect nationwide trends as well as continued property growth within the borough.

Actions: The cost for disposal of tonnage in excess of the contract target is met by the Public Realm contractor Veolia so waste minimisation remains a key driver for them. 2019/20 saw a focus on Recyclopedia which is a database of what can be recycled and how. An LWARB project was completed focussing on targeted contamination work on a London-wide basis and a West London Waste Authority project ran from late January to March, aimed at increasing the use of the food waste collections.

CIIr Krupa Sheth Amar Dave CIIr Krupa Sheth Amar Dave

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Number of active borrowers

YTD 34,676

Q1 Data not available Q2 27,804

Q3 30,681 Q4 34,676

W Target YTD: 35,592 Bigger is better

Comments & Actions

Contextual

Comments: Library services were very close to achieving targets as a service. Wembley exceeded in the months Jan-Feb and others were showing achievement and/or great strides in that direction. However, there a was notable marked drop in key performance areas compared to the previous year in the weeks leading up to the library closure presumably due to the escalating COVID-19 crisis to point in mid-March when inevitable library lockdown was implemented.

Actions: This will take a lot to recover from and in our recovery plans we will look to see how we can adapt new service plans to reflect the new approaches we've taken to engage with current and new audiences.

CWB-CUL002

New KPI for 2019/20

Number of cultural events in the libraries and museum

 768

 Q1
 287
 Q2
 250

 Q3
 200
 Q4
 25

 Target YTD: 129
 Bigger is better

ommonts & Actions

Comments: LAH exceeded the target for the year, but during Q4, after the return of services following the holidays, there was a increasing decline in attendees to events. This eventually led to decisions by partners delivering and/or audiences attending to cancel due to onset of COVID-19.

Actions: Events and activities will suffer the most as we recover from lockdown. We follow advice from Public Health England and partner organisations about when we will deliver face to face activities. In the meantime, we are transferring activities to online platforms and are looking at how we can evidence our impact in the immediate future.

Cllr Krupesh Hirani

CWB-PHE002

18/19 Outturn: 35,592

18/19 Outturn: 94.9%

Percentage of new birth visits within 14 days

96.2%
Q1 95.1% Q2 94.8%
Q3 98.0% Q4 97.3%

Target YTD: 95% Bigger is better

Comments & Actions

Comments: The public health service has worked closely with the providers to improve systems to inform staff when a family requires a new birth visit. They arrange an appointment straight away when they receive notification from maternity. This has helped data improve over the year and target has been met. Cllr Krupesh Hirani

Percentage of successful completions as a proportion of all opiate drug users in treatment

 8.09%

 Q1
 9.06%
 Q2
 7.81%

 Q3
 7.72%
 Q4
 8.09%

 Target YTD: 6.04%
 Bigger is better

Comments & Actions

Comments: This data represents performance for February before the current lockdown period and it may be the case that performance will reduce. However WDP/CNWL services continue to run from both Willesden Centre for Health and Care and Cobbold Road. Clinical Prescribing has been moved to the Willesden site, one to one support and outreach work continues to operate but no group work or weekend service.

Cllr Krupesh Hirani

Phil Porte

Phil Porter

Cllr Krupesh Hirani

18/19 Outturn: 9.26%

Phil

Phil Porter

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The overall number of wet and dry visits to Brent's sports centres

1,683,004 Q1 427k 367k Q3

Bigger is better Target YTD: 1.33m 18/19 Outturn: 1.77m

Comments: A disapointing end to the year with the reduction in use throughout February and March and then closure of all three centres due to COVID-19. We calculate, if no COVID-19 situation presented, we would have averaged 147,000 visits for March 2020, This would have brought our actual YTD closer to target with a smaller variance of 25,900 rather than the actual variance of 106,555 that we ended with. WSC have been down against target all year, for the first time since opening in 2006. This coincides with the opening of Moberly SC and the national falling trend in

Actions: Centres are currently working on their reactivation plans in readiness for when government gives the go ahead to re-open.

Stability of placements of Looked After Children: three or more placement moves (percentage)

15.3% YTD Q1 17.9% Q3 17.0% 15.3%

Smaller is better

Comments: A new system is in place to track placement changes and support staff working with most complex young people experiencing placement changes. This was put in place as a result of the work undertaken by the Task and Finish Group, reported

Actions: Temporary Placement changes are going to coded individually from 01/04/2020 as per option within DfE guidance which it is believed will have a positive impact on this KPI in 2020/21.

Phil Porter Cllr Mili Patel Cllr Krupesh Hirani

CYP-LOCODE **Number of Section 47 Investigations**

1.390 Q1 388 698 408 284

Taraet YTD: 1.000-1.500 Smaller is better 18/19 Outturn: 1,424

Comments & Actions

Comments: The number of S47s completed this year is within the target range and has reduced from last year's outturn.

Actions: .

Target YTD: 12%

18/19 Outturn: 13%

Percentage of S47s completed which led to Initial Child Protection Conference

29.8% YTD Q1 33.5% 30.2% 29.8% 30.3%

Taraet YTD: 30% Biager is better 18/19 Outturn: 28.2%

Comments: The proportion of S47s which led to an Initial Child Protection Conference is just below target, although this is an improvement on last year.

Gail Tolley

Actions: Work at the BFFD will continue to ensure that the threshold for S47 is being maintained consistently.

Child Protection rate per 10,000 children

YTD 35.4 01 38.5 Q2 Q3 35.7 32.6

Target YTD: 35-45 Smaller is better 18/19 Outturn: 38.4

Comments & Actions

Comments: The rate of children subject of a child protection plan is lower than the target and previous year's outturn. This reporting year has seen more children removed from child protection plans following successful interventions and fewer children becoming subject of a CP Plan.

Actions: This will continue to be monitored.

Cllr Mili Patel

Gail Tolley

Comments & Actions

Cllr Mili Patel

Strong Foundations

Gail Tolley

Gail Tolley

18/19 Outturn: £320k

Income generated by the Communications Team

£598,256 £140k £180k Q1 £151k £128k Taraet YTD: £428k Bigger is better

Comments: Filming and Advertising - charges for filming/parking at council locations, outdoor advertising and sponsorship contracts income for using council assets. Actions: Income severely affected by COVID-19 lockdown. Film companies simply cannot operate under social distancing restrictions and businesses do not have budgets to advertise during this crisis. Recovery plan to include: offering discounts to local businesses and location managers/film companies, updating of webpages, regular communication with advertisers and location managers and working with internal depts and local partners to promote our sites for filming after lockdown. Filming likely to recover quicker than advertising.

Number of complaints upheld by the ombudsman

18/19 Outturn: 23

YTD 9 Q1 Q3 2 Q4 Contextual

Comments: Of the 14 Ombudsman decisions made in Q4 2019/2020, two were upheld. This represents an uphold rate of 14%. The YTD figure of 19 of 78 cases upheld represents a 24% uphold rate from the Local Government and Social Care Ombudsman and the Housing Ombudsman..

Actions: Ensure that we learn from LGSCO and Housing Ombudsman decisions to prevent upheld decisions.

Cllr Muhammed Butt Cllr Margaret McLennan Shazia Hussain

Number of Stage 1 complaints upheld/partially upheld Data not available Q1 201 216 180 Q4 Data not available

Comments: Due to the issues we were facing with the ICMS system, a decision was made to completely rebuild it from scratch. This process has started and will be carrying on for the next few months at least. In the interim, we are continuing to use the existing ICMS system and trying to make small improvements as we go along. There are question marks of the quality of data and recently, we have started a data cleaning exercise to try and validate the information currently held on ICMS. This process is taking longer than expected and we have not yet gone through the Q3 19/20 data. Once this data has been cleansed, we will be looking to move to the next

quarter and so on until the new system is up and running.

Percentage of FOI requests responded to within 20 working days

Data not available

Q1 92% 95% Q3 93% Q4 Data not available

Target YTD: 90% Bigger is better 18/19 Outturn: 92%

Comments: Due to the issues we were facing with the ICMS system, a decision was made to completely rebuild it from scratch. This process has started and will be carrying on for the next few months at least. In the interim, we are continuing to use the existing ICMS system and trying to make small improvements as we go along. There are question marks of the quality of data and recently, we have started a data cleaning exercise to try and validate the information currently held on ICMS. This process is taking longer than expected and we have not yet gone through the Q3 19/20 data. Once this data has been cleansed, we will be looking to move to the next quarter and so on until the new system is up and running.

Cllr Margaret McLennan Cllr Margaret McLennan Shazia Hussair

ACE-EMS006 Percentage of members enquiries responded to within 10 days Data not available Q1 96% 96% Q3 97% Q4 Data not available π Target YTD: 100% Bigger is better

Contextual

Comments & Actions Comments: Due to the issues we were facing with the ICMS system, a decision was made to completely rebuild it from scratch. This process has started and will be carrying on for the next few months at least. In the interim, we are continuing to use the existing ICMS system and trying to make small improvements as we go along. There are question marks of the quality of data and recently, we have started a data cleaning exercise to try and validate the information currently held on ICMS. This process is taking longer than expected and we have not yet gone through the Q3 19/20 data. Once this data has been cleansed, we will be looking to move to the next quarter and so on until the new system is up and running.

ACE-EMS007 Percentage of Stage 1 complaints responded

Data not available

to within timescale (Corporate)

Q1 94% 96% Q3 94% Q4 Data not available

Target YTD: 100% Bigger is better 18/19 Outturn: 94%

Comments & Actions

Comments: Due to the issues we were facing with the ICMS system, a decision was made to completely rebuild it from scratch. This process has started and will be carrying on for the next few months at least. In the interim, we are continuing to use the existing ICMS system and trying to make small improvements as we go along. There are question marks of the quality of data and recently, we have started a data cleaning exercise to try and validate the information currently held on ICMS. This process is taking longer than expected and we have not yet gone through the Q3 19/20 data. Once this data has been cleansed, we will be looking to move to the next guarter and so on until the new system is up and running.

med Butt

Q

Q3

18/19 Outturn: 852

ACE-EMS008

18/19 Outturn: 97%

Percentage of Stage 1 complaints responded to within timescale (Statutory)

Data not available Q1 88% 93% Q3 93% Q4 Data not available

Target YTD: 100% Bigger is better 18/19 Outturn: 91%

Comments: Due to the issues we were facing with the ICMS system, a decision was made to completely rebuild it from scratch. This process has started and will be carrying on for the next few months at least. In the interim, we are continuing to use the existing ICMS system and trying to make small improvements as we go along. There are question marks of the quality of data and recently, we have started a data cleaning exercise to try and validate the information currently held on ICMS. This process is taking longer than expected and we have not yet gone through the Q3 19/20 data. Once this data has been cleansed, we will be looking to move to the next quarter and so on until the new system is up and running.

Cllr Margaret McLennan ACE-EMS009

> Percentage of Stage 2 complaints responded to within timescale (Corporate)

86.00% YTD

Q1 81% 75%

Target YTD: 100% Bigger is better 18/19 Outturn: 87%

Comments: The Q4 19/20 figure of 75% represents a drop in performance compared to the previous quarters. 45 of 56 Corporate stage 2 cases were completed in time. The YTD figure of 86% of 214 cases completed in time represents a slight dip of 1% compared to the previous year's outturn.

Actions: Ensure the service areas provide information in a timely manner but also work with the service area to improve on quality of Stage 1 responses. To also review sign off process.

Cllr Margaret McLennan

Shazia Hussain

Shazia Hussain

Cllr Margaret McLennan

Shazia Hussain

18/19 Outturn: 50%

Percentage of Stage 2 complaints responded to within timescale (Statutory)

Q1 50% 50% Q3 20% 33% Taraet YTD: 100% Bigger is better

Comments: Q4 19/20 Stage 2 statutory response performance remained the same as the previous quarter. The YTD figure of 43% (13 cases out of 30) in time is less than the 50% YTD outrun for the previous year and below the YTD target of 100%. This is largely due to an increase in cases and the nature and complexity of those cases. Actions: CYP complaints training is to be provided so we can improve on the number of Stage 1s that are escalated.

Percentage of telephone calls answered through the council's ACD system

YTD Q1 79.75% 81.24%

Q3 79.57% 88.00%

Comments: Target has been met overall, however the focus remains on improving the longest waiting time across all call queues and consistently achieving 80% and above on the Housing Benefit and Adult Social care call gueues which have improved this

Actions: This will be achieved through the continuous development and multi skilling of our workforce and technological enhancements.

Taraet YTD: 80%

Bigger is better 18/19 Outturn: 77.2%

Cllr Margaret McLennan

Shazia Hussain Cllr Margaret McLennan

22

Peter Gadsdon

Shazia Hussain

Percentage of staff who have completed mandatory online Information Governance courses within one month of becoming due 84% 83% Q1 Q3 86% Q4 88%

Target YTD: 90%

New KPI for 2019/20

Comments: Performance continues to improve.

Course material has recently been updated.

Actions: Ongoing review of training materials and responses to questions. To questions are fit for purpose.

Percentage of Subject Access Requests (SARs) responded to within the statutory timescales

96% YTD

86% 98% Q1 Q3 99% Q4 100%

Bigger is better

Target YTD: 90% 18/19 Outturn: 85%

Comments: Statutory requirement is being met. First time 100% for a quarter was achieved. We have been advised by the ICO they are happy with our performance and no longer wish to receive monthly updates.

Actions: To continue with weekly trackers and SAR forums with SA's to ensure performance is consistent.

Peter Gadsdon Cllr Margaret McLennan Cllr Margaret McLennan Peter Gadsdon

CDS-REG001 Percentage of deaths registered within five days (excluding those referred to the Coroner) 90.0% YTD Q1 93%

89%

Comments & Actions

Bigger is better

87%

Bigger is better

Comments: We registered 210, 143 and 251 deaths respectively in the quarter. In Jan and Mar we had the third highest death volumes and 4th in Feb across the London region. Havering in each month the highest. Overall YTD only two local authorities hit the 90% target Brent and Hounslow but we registered 987 more deaths - Successfully

Registration and Nationality external income achieved to date

£1,062,672 Q2 £282k £271k Q3 £254k Q4 £256k

Target YTD: £940k Bigger is better 18/19 Outturn: £1.22m

Comments & Actions

Comments: The drop of Income in March was due to the loss of income from the first COVID-19 death and cancellations of all appointments except death income. But due to higher income achieved in the first part of the quarter Income targets were achieved. Changes to the Certificate fee and higher numbers of private citizenship ceremonies assisted the increase of fees and the start of a marketing strategy to promote our wedding suite.

Margaret McLennan Œ

Q3

S

Target YTD: 90%

18/19 Outturn: 81%

Percentage of births registered within 42 days

Q4

99.00% Q1 98% Q3 99% Target YTD: 98% Bigger is better

Comments: The percentage of birth registrations within 42 days fluctuated in quarter 4, with 458 births registered in Jan 20, 405 in Feb 20 and 238 in Mar 20. Mid month in Mar birth registrations had to cease due to the COVID-19 pandemic. In total 1101 births were registered. YTD successfully achieved the target

Actions: Mitigate backlog of unregistered births - Extra diaries put in place once the COVID-19 lockdown is opened for parents to register their childrens' births

Cllr Margaret McLennan

Average days taken to process new benefit claims and change events

YTD Q1 9.1 Q2 8.5 Q3 8.9 Q4 8.1 Target YTD: 8.7 Smaller is better

Comments: The amount of outstanding cases has reduced month on month and our workload has reduced to 2700 items which equates to 10 days' work which has helped to keep our processing times down.

Peter Gadsdon

Actions: The processing times have improved and we envisage that we will continue to stay within target however there is an uncertainty around how COVID-19 will affect us, However we are now focusing on dealing with cases in an holistic approach. Yearend for Benefits and the New Council Tax Support that was brought back in-house for this year was a success. Credit to all members of staff that were involved, the project was managed well and implemented without a hitch.

Cllr Margaret McLennan

Peter Gadsdon

Peter Gadsdon

18/19 Outturn: 11.32

Cllr Margaret McLennan

Peter Gadsdon

CDS-REV002

New KPI for 2019/20

Non-Domestic Business Rates (NNDR)

Q3 26.4% Q4 Comments & Actions

Comments: The final number is delayed given the burden of the NNDR grants and extended retail relief taken on by capita as part of the COVID-19 emergency response. Actions: Should show improvement for next quarter.

Percentage of Council Tax collected

96.00% YTD

Q1 30.3% 26.0% Q3 25.8% Q4 14.0%

Target YTD: 85.2% Bigger is better 18/19 Outturn: 96.08%

Comments & Actions

Comments: Finishing 0.1% lower with cash payments affected by the onset of COVID-19 from mid-March.

Actions: Should show improvement for next quarter.

98.20% YTD Q1 15.5%

Target YTD: 87% Bigger is better 18/19 Outturn: 99.02%

Cllr Margaret McLennan

Peter Gadsdon

Cllr Margaret McLennan Peter Gadsdon

Comments & Actions
Comments & Actions
Comments: As with in-year collection, March 2020 was a poor month, affected by COVID-19 pandemic.
Actions: Should show improvement for next quarter.

YTD £3,004,492
Q1 £395k Q2 £950k
Q3 £1.07m Q4 £590k
Target YTD: £2.40m
18/19 Outturn: £2.40m

Bigger is better
18/19 Outturn: £2.40m

Peter Gadsdon

CDS-REV005

Value of HB overpayments recovered

£8,645,867

Q1 **£2.13m** Q2 **£2.36m** Q3 **£2.15m** Q4 **£2.06m**

Target YTD: £7.20m Bigger is better 18/19 Outturn: £9.63m

omments & Actions

Comments: 93% collection achieved as recovery totalled £8.65m against a target of £9.3m. Impacted by UC implementation and later COVID-19.

Actions: Currently focussed on providing support to vulnerable customers affected by COVID-19. Direct Earnings deductions have ceased temporarily, officers are instructed to handle requests for repayment deferment or cessation of deductions from HB entitlement on case by case basis following contact for assistance.

Cllr Margaret McLennan Peter Gadsdon Cllr Margaret McLennan Peter Gadsdon

Peter Gadsdon

CDS-WEB001
33% of all website traffic generated from repeat visitors

YTD **27.00%**Q1 35% Q2 31.8%
Q3 30.0% Q4 29.6%

Target YTD: 33% Bigger is better
New KPI for 2019/20

Comments & Actions

Comments: Due to the current Coronavirus situation, we have seen an increase in new users in Q4 and many return visitors are going to My Account only, which these figures don't track. YTD, due to the way Google reports 'repeat' visitors the full year number is lower than each individual quarter because a recognised repeat visitor is only counted once in whatever date range you are looking at. So if you have a user that returns every quarter, they count as 1 user in each of those quarters. However, if you look at the entire year, that user is only counted once and therefore the number is lower than the cumulative.

Actions: We will look at the validity of this metric when considering KPIs for 20-21 to ensure that this is still appropriate to track and whether the metrics should expand to include the complete user journey.

32.92%

CDS-WEB002

below 33%

Q1 **32.6**% Q2 **35.67**% Q3 **32.72**% Q4 **28.30**%

Average days sickness (Previous 12 months)

Average website bounce rate from visitors

Target YTD: 32% Smaller is better New KPI for 2019/20

Comments: A lot of work has been undertaken to restructure the key areas of the site this year and streamline priority areas in order to simplify the user journey. In the areas that we have updated we have seen a direct reduction in bounce rates which suggests that the information is more relevant to people when they first land on the site. Over the course of the year, we have brought the bounce rate down to the benchmark level but there are still issues with this metric on mobile devices. Actions: The new website will be designed to be much more responsive on all devices, which should help us to bring bounce rates down further in 2020-21.

r Margaret McLennan

CEX-FIN001

Percentage of invoices paid on time

74.36%
q1 77.8% q2 75.4%
q3 71.3% q4 72.93%

Target YTD: 80% Bigger is better 18/19 Outturn: 77.9%

Comments & Actions

Comments: The predominant reason for late payment of invoices is the late receipting of PO numbers, including retrospective raising of PO numbers after the invoice date. Actions: The Accounts Payable improvement programme include identifying pockets of slow PO performance in departments while working with Business partners to solve invoices on payment hold on Oracle.

CEX-HRE001

Q3

Comments & Actions

Comments: This slight increase in sickness reflects the usual increase expected in the winter months

Peter Gadsdon

YTD **6.77**Q1 6.07 Q2 6.05

6.13

Minesh Patel Cllr Margaret McLennan Debra Norman

6.77

Contextual

CWB-HMA003

18/19 Outturn: 98.62%

Cllr Margaret McLennan

Current rent collected as a percentage of rent due

98.60%
Q1 100.0% Q2 100.9%
Q3 98.5% Q4 98.6%

Target YTD: 99.5% Bigger is better

Comments & Actions

Comments: The service did not meet the target for rent collection this year however a number of new initiatives have been proposed to ensure rent arrears lost in 2019/2020 will be captured in 2020/2021. There will be a bigger focus on getting people onto direct debits and using a targeted approach to arrears via the new CRM module set to launch in June 2020.

VB-HMA004

18/19 Outturn: 6.11

New KPI for 2019/20

Current rent collected for households on Universal credit as a percentage of rent due

98.63%
Q1 92% Q2 114%
Q3 88% Q4 99%

Target YTD: Contextual Bigger is better

mments & Actions

Comments: This is a good performance for the service as Universal Credit is perceived to be a risk to income collection for the housing service. The team has concentrated on supporting those in receipt of Universal Credit to prioritise their rent payment and where possible default payment directly to the housing service.

Cllr Eleanor Southwood Phil Porter Cllr Eleanor Southwood Phil Porter

Comments: The concentrated work done through the Wates improvement Percentage of housing customers satisfied programme. We are working hard to maintain service standards and continue with the repairs service received 83.00% Q1 Q3 83.4% 83.0% Q4 Target YTD: 82% Bigger is better 18/19 Outturn: 77%

Percentage of calls answered in three minutes (Housing Management)

50.93% YTD Q1 Q3 46.3% Q4 50.9%

Target YTD: 80% Bigger is better 18/19 Outturn: 65.4%

Comments: The contact centres ability to answer calls within three minutes has been impacted by a number of factors. The first is the introduction of new systems and how these systems interface has meant processing calls is taking longer. The second is the types of queries that come through are more complex than signposting to responsible teams, the contact centre seeks to resolve issues where possible on the phone which impacts on the call handling time. The third key factor that this indicator does not take into consideration is the number of outbound calls made by the Contact Centre. If outbound calls are taken into consideration the total number of calls made two and from the contact centre is double which then impacts capacity to solely answer inbound calls within three minutes. The service has committed to staying focused on creating good outcomes rather than answering calls within a specific time but will work with residents to ensure this experience remains positive and call waiting times are kept as low as possible.

Phil Porter Phil Porter Cllr Eleanor Southwood Cllr Eleanor Southwood

_					
	R&E-BCO	001			
	Income	e generated by			
	YTD	£1 🎗	50	1/15	
	™ £1,850,145			,	
	Q1	£574k	Q2	£751k	
		casol		cancl	
0	Q3	£220k	Q4	£306k	
Page	Target YTD: £1.19m Bigger is better				
æ		Outturn: £1.39m		33	
	.,				

Revenue income secured from commercial portfolio

£2,328,128 YTD £519k Q2 £681k Q1 £565k Q4 £563k Q3 Target YTD: £1.80m Bigger is better 18/19 Outturn: £2.42m

Comments & Actions

Comments: New voids, legacy credits notes produced.

Ir**O**ama Tatler

Amar Dave Cllr Shama Tatler

Amar Dave

Internal Business

Target YTD: 2,240

New KPI for 2019/20

Number of EHCPs maintained

2,435 YTD Q1 2,251 2,185 2,329 2,435 Q3

Smaller is better

Comments: The number of new plans issued has been rising over the past four years. There has been a significant rise in Early Years assessments during 2019/20. The March 2020 YTD figure (2435) is 4.6% more than the December 2019 YTD (2329). Actions: This is a demand-led statistic. The council will continue to review processes to ensure the efficient and effective maintenance of EHCPs.

18/19 Outturn: 387

Average days between a child entering care and moving in with his/her adoptive family, for those adopted (three year average)

YTD Q1 398.0 Q2 392.4 Q3 392.4 393.0 Q4 Smaller is better Target YTD: 355

Comments: The end of year position is higher than the target due to delays placing one child, where it took a year after her Placement Order was granted to find adopters due to her additional needs. Currently, there are 9 children subject to Placement Orders/Care Orders, 8 of whom have been placed for adoption and one remaining in a

Actions: The placement of individual children will continue to be tracked.

Cllr Mili Patel

Cllr Mili Patel

Internal Business

CYP-LOC002

YTD

Q1

Target YTD: 550

Rate of referrals per 10,000 children

136.8 395.7

543.7

255.9

543.7

Smaller is better

	CYP-LAC0	04			Comments & Actions
		Looked After	Children ı	ner 10.000 of	Comments: There has been a slight reduction in the number of children in care. This is
	popula			20. 20,000 0.	as a result of some children being reunified with their families at the end of court proceedings and young people turning 18.
Δ	YTD	3	37.7	7	
	Q1	39.5	Q2	41.6	
	Q3	39.2	Q4	37.7	
	Target YTD: 40 Smaller is better 18/19 Outturn: 38.7				

Clir Mili Patel Gail Tolley Clir Mili Patel Gail Tolley

	CYP-LOCO	04			Comments & Actions
	Numbe	r of Children a	and Fami	ly Assessments	Comments: There were 3874 CFAs completed in 2018/2019 and there have been 3688 completed in 2019/20. In light of the increase in contacts through the BFFD, this is a positive result and suggests that contacts are being effectively filtered in the BFFD.
	YTD	3	,68	88	
	Q1	895	Q2	1,010	
	Q3	823	Q4	959	
Pag	5	TD: 3,000-4,00 for 2019/20	00	Smaller is better	

Clli 🛈 li Patel Gail Tolley Cllr Mili Patel

	Percentage of permanent social work grade posts (S02-P03)					
YTD	Data no	t a	vailable			
Q1	66.24%	Q2	74.8%			
Q3	Data not available	Q4	Data not available			
_	Target YTD: 75% Bigger is better New KPI for 2019/20					

Cllr Mili Patel Gail Tolley

	18/19 0	utturn: 542.8			
llr Mili	Patel				Gail Tolley
	CYP-LOC00	05			Comments & Actions
	Rate of 10,000		amily A	ssessments per	Comments: The positive CFA rate is a result of the effective filtering of referrals at the Brent Family Front Door.
V	YTD	47	73	.5	
	Q1	115.4	Q2	244.6	
	Q3	106.6	Q4	123.1	
	_	TD: 387-515 utturn: 501.9		Smaller is better	

Comments & Actions

within our target range.

Comments: Performance of 543.7 is almost exactly the same as last year and falls

Gail Tolley