



Cabinet

Monday 14 June 2021 at 10.00 am

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

Please note that this meeting will be held as a socially distanced physical meeting with all Cabinet members required to attend in person.

Guidance on the safe delivery of face-to-face meetings is included at the end of the agenda frontsheet.

Due to current restrictions and limits on the socially distanced venue capacity, any press and public wishing to attend this meeting are encouraged to do so via the live webcast. The link to attend the meeting will be made available [here](#).

Membership:

Lead Member Councillors:

Portfolio

M Butt (Chair)	Leader of the Council
McLennan (Vice-Chair)	Deputy Leader of the Council and Lead Member for Resources
Farah	Lead Member for Adult Social Care
Knight	Lead Member for Community Safety and Engagement
Nerva	Lead Member for Public Health, Culture & Leisure
M Patel	Lead Member for Children's Safeguarding, Early Help and Social Care
Krupa Sheth	Lead Member for Environment
Stephens	Lead Member for Schools, Employment and Skills
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**

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;

or

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
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1	Apologies for Absence	
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2	Declarations of Interest	
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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 - 12
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To approve the minutes of the previous meeting held on Tuesday 6 April 2021 as a correct record.

4	Matters Arising (if any)	
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To consider any matters arising from the minutes of the previous meeting.

5	Petitions (if any)	
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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)	
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To consider any reference reports from any of the Council's two Scrutiny Committees.

Chief Executive's reports

7	Treasury Management Outturn Report 2020/21	13 - 32
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Ward Affected:
All Wards

Lead Member: Deputy Leader (Councillor Margaret McLennan)

Contact Officer: Amanda Healy, Senior Finance Analyst

Tel: 020 8937 5912

Amanda.Healy@brent.gov.uk

Regeneration and Environment reports

8 Neasden Stations Growth Area (NSGA) Masterplan

33 - 134

Ward Affected:

Dollis Hill;
Dudden Hill;
Welsh Harp;
Willesden
Green

Lead Member: Lead Member for Regeneration,
Property & Planning (Councillor Shama Tatler)

Contact Officer: Jonathan Kay, Major Projects
Team

Tel: 020 8937 2348

jonathan.kay@brent.gov.uk

Digital and Customer Services reports

9 Brent Technology Roadmap Capital Investment

135 - 156

Ward Affected:

All Wards

Lead Member: Deputy Leader (Councillor
Margaret McLennan)

Contact Officer: Sally Chin, Head of ICT and
Applications Support

Tel: 020 8937 1432

sally.chin@brent.gov.uk

10 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.

11 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 19 July 2021

Guidance on the delivery of safe meetings at The Drum, Brent Civic Centre

- We have revised the capacities and floor plans for event spaces to ensure they are Covid-19 compliant and meet the 2m social distancing guidelines.
- Attendees will need to keep a distance of 2m apart at all times.
- Signage and reminders, including floor markers for social distancing and one-way flow systems are present throughout The Drum and need to be followed.
- Please note the Civic Centre visitor lifts will have reduced capacity to help with social distancing.
- The use of face coverings is encouraged with hand sanitiser dispensers located at the main entrance to The Drum and within each meeting room.
- Those attending meetings are asked to scan the coronavirus NHS QR code for The Drum upon entry. Posters of the QR code are located in front of the main Drum entrance and outside each boardroom.
- Although not required, should anyone attending wish to do book a lateral flow test in advance these are also available at the Civic Centre and can be booked via the following link: <https://www.brent.gov.uk/your-community/coronavirus/covid-19-testing/if-you-dont-have-symptoms/>

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LONDON BOROUGH OF BRENT

MINUTES OF THE CABINET

Held as an online virtual meeting on Tuesday 6 April 2021 at 10.00 am

PRESENT (in remote attendance): Councillor M Butt (Chair), Councillor McLennan (Vice-Chair) and Councillors Farah, Knight, Nerva, M Patel, Krupa Sheth, Stephens, Southwood and Tatler.

Also present (in remote attendance): Councillor S.Choudhary (for Agenda Item 5 as Chair of Brent Pension Fund Sub Committee) and Councillor Kelcher (representing the lead petitioner for Agenda Item 5).

1. **Apologies for Absence**

None.

2. **Declarations of Interest**

None.

3. **Minutes of the Previous Meeting**

RESOLVED that the minutes of the previous Cabinet meeting held on Monday 8 March 2021 be approved as an accurate record of the meeting.

4. **Matters Arising (if any)**

None.

5. **Petitions (if any)**

Cabinet received a petition submitted by Brent Divest, which members noted contained nearly 1,400 signatures. The petition called on Brent Council to make a public divestment statement committing the Brent Pension Fund to fully divest from fossil fuel companies and shift these funds to lower risk ethical investments.

Councillor M.Butt, Leader of the Council, advised members that he had agreed to receive the petition at the Cabinet meeting given its link to the content of the Climate and Ecological Emergency Strategy due to be considered later on the agenda. He then welcomed Simon Erskine (Brent Divest) as lead petitioner and Councillor Kelcher who members were advised would be presenting the petition on Mr Erskine's behalf. In presenting the petition Councillor Kelcher highlighted what he felt to be the strong policy, democratic and economic case supporting an immediate commitment and move towards divestment.

Councillor M.Butt thanked Councillor Kelcher and Simon Erskine for attending the meeting to present the petition and advised that he had also agreed to accept an

additional request to speak at the meeting on the same issue. The request was from Councillor S.Choudhary, as Chair of the Brent Pension Fund Sub Committee. In addressing the meeting, Councillor Choudhary highlighted the strategy already established by the Pension Fund to diversify their investment portfolio away from fossil fuel companies and towards more sustainable and low carbon funds. The approach adopted had been designed to balance the legal and fiduciary duties on the Pension Fund against the need to manage the overall level of risk. It also took account of the size of the Fund and resources available and had been aligned to the wider approach being led through the London CIV on behalf of London Councils.

Councillor M.Butt, then invited Councillor McLennan to respond to the petition, as Deputy Leader and Lead Member for Resources. In responding Councillor McLennan felt there was a need to recognise the progress being made by the Pension Fund in relation to their divestment strategy, linked to the approach being co-ordinated through the London CIV. Whilst appreciating that this was over a longer term basis than the action being sought by the petitioners, members were advised of the Council's commitment towards progressing the divestment strategy, with a clear roadmap being developed as part of the work on delivery of the Climate Emergency Strategy balanced against the mitigation of risk to the Pension Fund.

Having noted the progress made to date Councillor M.Butt, as the Leader of the Council, supported by Councillor Krupa Sheth, as Lead Member for Environment, closed the discussion by re-emphasising the Council's commitment towards delivery of a responsible divestment strategy closely linked to the overall approach being co-ordinated through the London CIV and Council's Climate Emergency Strategy. It was felt this would provide the necessary transparency whilst also mitigating risk to deliver the best outcome for all.

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

There were no references from Scrutiny submitted for consideration at the meeting.

7. Brent Climate and Ecological Emergency Strategy 2021-30

Councillor Krupa Sheth, as Lead Member for Environment, introduced a report presenting the final version of Brent's Climate and Ecological Emergency Strategy (2021-2030) for adoption following an extended period of public consultation.

In presenting the report, members noted that the Strategy included the key objectives, themes and areas of focus designed to support Brent in working towards the aim of being carbon neutral by 2030. Councillor Krupa Sheth also highlighted the extensive and ongoing consultation and engagement undertaken in developing the strategy along with its alignment to key London-wide goals. The strategy also included, as an overarching theme, the provision of support to local communities in delivering the proposed climate objectives with a key focus on development and expansion of the Brent Environmental Network for organisations, communities and individuals as a means of driving the agenda forward and supporting the key sectors at the forefront of delivering the sustainable change required. It was felt the pandemic had also highlighted the need to deliver change especially from an environmental justice perspective in relation to air quality.

As additional comments in support of the Strategy, Councillor Tatler highlighted the supporting work being undertaken with local business and developers to encourage greener and more sustainable developments and ways of operating alongside the transport initiatives being led through the Active Travel Programme. Councillor McLennan also took the opportunity to highlight the important links established within the recently adopted Procurement Strategy.

In concluding, Councillor M.Butt, supported by Councillor Krupa Sheth, thanked all officers involved for their efforts in developing such an important Strategy for the Council as well as all individuals and organisations engaged through the Brent Environmental Network. In highlighting the joined up nature of the key themes contained within the Strategy relating to consumption, resources and waste; transport; homes buildings and the built environment; nature and green space the Leader recognised the need for individual as well as collective effort to be made in order to achieve the objectives outlined with the Strategy.

Having completed their consideration of the Strategy, Cabinet **RESOLVED:**

- (1) To approve the final Brent Climate and Ecological Emergency Strategy (2021-2030) following a further period of public consultation and following further officer consideration on the basis of the updated strategy document provided as Appendix A of the report.
- (2) To note that a more detailed breakdown of the consultation process, a short illustrative version and an easy-read version for people with disabilities would be made available on the Climate Emergency section of the council's website (www.brent.gov.uk/climateemergency).

8. **Streamlining of the Brent Black Community Action Plan**

Councillor McLennan, as Deputy Leader and Lead Member for Resources, introduced a report presenting a streamlined version of the Brent Black Community Action Plan (BCAP) for review and adoption.

Members noted that the streamlined plan had incorporated feedback from the recent Local Government Association (LGA) Peer Review on the Council's approach towards equality diversity and inclusion for Black communities and also included a Year One Delivery Plan developed to focus on the priority areas to be delivered over the next financial year. Alongside delivery of the year one priorities, medium and long term delivery plans were also being developed to ensure a focus on the Council's long term sustainable commitment towards the Community Action Plan. The key changes to the streamlined planned, which members were advised had been led and developed in consultation with the community reference group, were outlined in section 3 of the report with members noting the focus within the initial Year One Delivery Plan on the following outcomes in relation to:

- Early Intervention: children, young people and families;
- Building sustainable community capacity; and
- Supporting Black-led organisations.

In addition, members were advised of the further development of the Plan to address targets in relation to health inequalities (highlighted as one of the outcomes of the pandemic) linked to the wider aims within the Borough Plan 2021-22 and

development of the Health & Wellbeing Strategy. In order to retain accountability the thematic steering groups would remain in place but would be rationalised to three core groups focussed on the above priority areas and with the wider community reference group continuing to meet bi-monthly in order to maintain an overview. As a recommendation from the LGA Peer Review members also noted the designation of Councillor McLennan (working with Councillor Knight) as lead for the Black Community Action Plan.

Councillor Knight, as Lead Member for Community Safety and Engagement, in supporting and welcoming the streamlined version of the Black Community Action Plan commended the focussed approach towards delivery of the identified priorities, supported through the delivery of a programme of sustainable community capacity and engagement.

In summing up, Councillor M.Butt, as Leader of the Council, took the opportunity to thank the community reference group for their ongoing support and engagement and highlighted the Council's commitment to continue working with the local community to address the issues and concerns raised. This commitment he felt had also been demonstrated with the Council having been one of the first local authorities to engage with the LGAs Peer Review process to assess individual Council's commitment to equality, diversity and inclusion for Black communities and with the recommendations which had emerged as a result being incorporated within the Community Action Plan.

As a result of the discussion at the meeting, it was **RESOLVED** that Cabinet:

- (1) Note the content of the report.
- (2) Note and endorse:
 - (a) the Streamlined Brent Black Community Action Plan (as detailed within Appendix 2 of the report); and
 - (b) the Year One Delivery Plan (as detailed within Appendix 3 of the report).

9. **Public Sector Decarbonisation Scheme - Energy Efficiency - Works in Brent Corporate Buildings**

Councillor McLennan, as Deputy Leader and Lead Member for Resources, introduced a report detailing a scheme to improve the energy efficiency of a number of Brent Council's retained buildings assessed to have the highest energy consumption.

Members noted that the project formed part of the Council's wider Climate and Ecological Emergency Strategy with the scheme focussed on upgrading and improving the carbon efficiency in a number of the Council's own buildings. The scheme would be funded through £3.234m of Section 31 grant funding which the Council had secured through the Public Sector Decarbonisation Scheme via the Department for Business, Energy & Industrial Strategy.

In welcoming the report, Councillor Krupa Sheth, as Lead Member for Environment, highlighted the co-ordinated approach the scheme represented as part of the

Council's wider Climate and Ecological Emergency Strategy. In concluding the discussion Councillor M.Butt, Leader of the Council, outlined how he felt the project demonstrated the lead being taken by the Council in terms of the commitment towards tackling the climate and ecological emergency and carbon reduction programme.

In considering the recommendations, Cabinet noted the information provided within the exempt appendix accompanying the report.

In view of the support expressed at the meeting it was **RESOLVED** that Cabinet:

- (1) Approve the project to improve the energy efficiency of selected Brent Council retained buildings with the highest energy consumption as detailed in Table 1 within section 3.8 of the report.
- (2) Delegate authority to the Assistant Chief Executive, in consultation with the Lead Member for the Environment, to make further adjustments to the building and technology selection for the project referred to in (1) above to ensure best value, for the reasons detailed in section 3.7 of the report.
- (3) Approve the Council entering into a grant agreement with the Department for Business, Energy & Industrial Strategy to fund the project referred to in (1) above in the sum of £3,234,000.
- (4) Note that officers would undertake procurements to appoint a range of consultants and contractors using powers delegated under Part 3 of the Constitution to achieve the aims of the project referred to in (1) above.

10. **Corporate Performance - Q3 2020/21 Performance**

Councillor McLennan, as Deputy Leader and Lead Member for Resources, introduced a report providing a corporate overview of performance in Quarter 3 (October 2020 – December 2020) of 2020-21, linked to the Borough Plan priorities.

In presenting the report, Councillor McLennan highlighted the impact of the Covid-19 pandemic on all services across the organisation as the Council continued to focus on delivery of the response and subsequent effect this had had on a number performance indicators across priority areas. Whilst this had resulted in 34% of indicators being rated as red compared to 24% at the same point in 2019-20 Cabinet also noted the focus of Lead Members, working jointly with their relevant Strategic Directors, in seeking to mitigate and address performance in these areas as the Council moved forward from the pandemic. Members also noted that the Quarter 4 corporate performance update (scheduled for June 2021) would expand further on the impact of the pandemic by providing a comparison of 2020-21 performance against the targets set for the current year as well as against those in 2019-20. The report would also include data on annual measures as well as highlighting, where possible, how Brent had performed in comparison to other London authorities and benchmarking data.

In responding to the update Councillor Mili Patel, Lead Member for Children's Safeguarding, Early Help and Social Care, highlighted the specific impact of the pandemic in relation to performance targets across Children & Young People along

with the action being taken to mitigate these. Whilst action was ongoing to address the impact on performance, Cabinet also noted the positive progress that it had still been possible to make in relation to performance on Looked After Children placements, as detailed in section 3.6 of the report, and the ongoing programme of early intervention being led through the Black Caribbean Achievement Champions in terms of attainment for boys of Black Caribbean heritage, as detailed in section 3.8 of the report.

Moving forward, Councillor M.Butt, as Leader of the Council, highlighted the importance of the Council continuing to focus its attention in supporting local residents through the pandemic alongside the work being undertaken to bring performance back on track, on which a more detailed outline would be provided as part of the Quarter 4 update.

Having considered the update provided, it was **RESOLVED** that Cabinet:

- (1) Note the performance information contained in the report.
- (2) Note the challenge process along with current and future strategic risks associated with the information provided and approve actions being undertaken on strategic risks, as appropriate.
- (3) Note the impact of the pandemic on performance against targets across the organisation as the Council had continued to work intensively to respond to Covid-19.

11. **Water Charges and Brent Council Tenants**

Councillor Southwood, Lead Member for Housing and Welfare Reform, introduced a report outlining the proposed approach towards issuing refunds to current and former Brent Council tenants in relation to previous arrangements for the billing and collection of water charges.

Members noted the background to the proposal, which had related to historic contractual arrangements entered into by Brent Housing Partnership with two water companies Thames Water Utilities in 2003 and Affinity Water in 2005. At that time it had been possible for water companies to offer Council's and social housing landlords the opportunity to provide billing and collection services for water rates in return for a void allowance for empty properties and commission to reflect the administrative costs and transfer of risk and bad debt associated with the accounts. As a result of a court judgement in 2016 relating to the arrangements operated by the London Borough of Southwark and a subsequent Court of Appeal decision in 2020, the Council had undertaken a review of its arrangements with both suppliers, which had been assessed as no longer fit for purpose. Given the current legal position and associated implications (as outlined in section 3 of the report) it had been recommended that refunds in respect of water charges be offered to both current and former tenants.

Members also noted the considerations which had been taken into account in developing the refund scheme, as detailed in section 4 of the report, and proposed key milestones for implementation, as detailed in section 5 of the report. In terms of the approach outlined, members were advised that the issues involved had related

to the tariffs available and way in which discounts for voids and commission arrangements had been applied and utilised rather than any suggestion tenants had been overcharged as a result of the arrangements.

Cabinet were supportive of the approach outlined having also noted the prudent financial modelling in relation to managing the financial implications of the refund scheme on the Housing Revenue Account. Having noted the report it was **RESOLVED** to approve the following approach regarding the payment of refunds in respect of water charges:

- (1) Refunds for both current and former tenants being calculated from the contractual start dates i.e. Thames Water Utilities 2003 and Affinity Water from 2005.
- (2) Refunds for current tenants being issued to their rent accounts with those in credit able to apply for the amount to be debited to their bank accounts, and if in arrears, the refund being used to offset the arrears owed.
- (3) Refunds for former tenants being:
 - (i) issued to their rent accounts where former tenants have rent arrears to offset any arrears owed to the Council;
 - (ii) paid into leaseholders accounts (who were tenants at the time) if they are currently in occupation; and
 - (iii) subject to a process being established for former tenants (with no current relationship with Brent Housing Management) to apply for a refund and ensure this was publicised with a cut-off date of two years from the point of launching the application process.

12. **Authority to Commission Community Equipment Provider**

Councillor Farah, Lead Member for Adult Social Care introduced a report detailing the award of a call-off contract for the community equipment provider.

In considering the proposed award of contract, members noted the statutory duty on local authorities to make arrangements for the provision of disability aids and “community equipment” to meet the assessed eligible needs of individuals resident in their area along with the support provided enabling residents to remain living independently for as long as possible. The provision of this community equipment also contributed directly to the delivery of a number of key strategic priorities for both the Council and NHS including hospital discharge and avoidance, reducing the use of residential care and reduced reliance on homecare provision.

The main elements of the service were set out in section 3.6 of the report, with members also noting the increasing level of demand for equipment. Whilst the new service would remain broadly in line with existing provision there had been a number of improvements planned as part of the new specification in terms of efficiency and stakeholder contact with the service.

In considering the recommendations, Cabinet noted the information provided within the exempt appendix accompanying the report.

Having noted the statutory duty to provide the service and its significant contribution towards a number of key strategic priorities, it was **RESOLVED** that Cabinet:

- (1) Note officers involvement in the procurement of a framework for Community Equipment let by the London Borough of Barnet.
- (2) Approve the award of a call-off contract from the framework referred to in (1) above for Community Equipment to Milbrook Healthcare Limited for a period of 5 years from the 1st July 2021 until 30 June 2026 with optional break clauses exercisable at the ends of years 3 and 4 of the contract.

13. **South Kilburn Regeneration Programme: Approval of Procurement Processes for Future Phases and Associated Matters**

Councillor Tatler, Lead Member for Regeneration, Property & Planning, introduced a report seeking approval for a number of matters in order to maintain progress on the ongoing South Kilburn estate regeneration programme.

Members noted the progress being made on the South Kilburn regeneration programme, since the resident ballot, including the successful move of residents from Hereford House & Exeter Court into their new homes on the Gloucester & Durham site. Cabinet was advised that the report was seeking specific approval for the procurement of delivery partners/contractors for the remaining phases (3b – 8) of the South Kilburn programme sites and the NWCC sites along with the drawdown of £4.9m of Strategic Community Infrastructure Levy funding to cover the cost of associated works relating to infrastructure and public realm.

In expressing support for the proposals, Cabinet noted the ability these would provide to ensure the progress being made on the regeneration programme in South Kilburn could continue to move forward at pace.

In considering the recommendations, Cabinet noted the information provided within the exempt appendix accompanying the report and it was **RESOLVED** to:

- (1) Approve the procurement of a delivery partner for the NWCC site including, 1-8 Neville House, 1-64 Winterleys, 113-128 Carlton House and Carlton Hall; through inviting tenders using a Competitive Procedure with Negotiation under the Public Contracts Regulations 2015.
- (2) Approve the procurement of delivery partners/contractors for the remaining Phases (3b-8) of the South Kilburn Programme sites.
- (3) Delegate authority to the Strategic Director of Regeneration & Environment in consultation with the Lead Member of Regeneration, Property and Planning, to select the appropriate procurement route and pre-tender considerations for those remaining sites within Phases 3b-8 and to evaluate such tenders.
- (4) Delegate to the Strategic Director of Regeneration and Environment in consultation with the Lead Member Regeneration, Property and Planning, authority to award the contract for Delivery Partners to progress the comprehensive redevelopment of the remaining sites from Phase 3b-8 within the South Kilburn Programme.

- (5) Delegate to the Strategic Director of Regeneration and Environment in consultation with the Lead Member Regeneration, Property and Planning, the decision on alternative development routes if procurement was unsuccessful in relation to the remaining sites from Phase 3b-8 within the South Kilburn Programme.
- (6) Approve the setting of rent levels for the affordable homes at all remaining sites within the Programme (Phases 3b-8) at the South Kilburn Social rent levels.
- (7) Approve capital funding (strategic community infrastructure levy) of £4.9m to deliver the infrastructure and public realm works within the NWCC Project.

14. **Roe Green Infant School Kitchen & Improvement Works - Approval of Capital Funding**

Councillor Stephens, Lead Member for Schools, Employment & Skills, introduced a report seeking approval to assign the necessary capital funding in order to deliver an extension of kitchen facilities at Roe Green Infant School.

In considering the report Cabinet noted the extension of facilities had been designed in consultation with the School's Senior Leadership Team with the purpose of enabling the school to meet its obligation to offer free school meals to all Reception, Year 1 and Year 2 pupils. This would not only support the universal infant free school meals policy project but was also closely aligned to the priorities within the Borough Plan relating to both (Every Opportunity to Succeed) supporting the continued improvement of early years provision and schools and (Strong Foundations) the building of services around residents and their needs.

Members were advised that the funding for the scheme could be met from unallocated Basic Need and s106 funding, as detailed in section 4 of the report.

Having expressed support for the scheme it was **RESOLVED** to approve the allocation of £538,280.36 from the Council's Basic Need Allocation to deliver the kitchen and £189,300.64 s106 funding, as detailed within sections 4.5 and 4.6 of the report.

15. **Debt Write-Off Procedure**

Councillor McLennan, Deputy Leader and Lead Member for Resources, introduced a report advising of changes to the debt write-off procedure which had been designed to improve its efficiency and effectiveness and reporting on those debts over £3,000 which had been written off, as required under the Council's Constitution. The report also advised of an update to the Council's Ethical Debt Recovery policy in order to include reference to the new Breathing Space requirements.

Cabinet noted the link between the Council's debt write off and Ethical Recovery policies as part of a co-ordinated approach and focus towards financial inclusion. The report was the first presented to Cabinet since an Internal Audit review in June 2019 had recommended that where it was certain debts were no longer recoverable

or cost-effective to recover they should be written off following appropriate review and authorisation. Following the Internal Audit review an initiative had been launched to review old debts, with a revised write off procedure approved by the Director of Finance. The revised procedure included the requirement for debts written off over £3,000 to be routinely reported to Cabinet, although members also noted the intention to review this limit given the length of time it had been in existence.

The list of those debts written off over £3,000 had been detailed within Appendix 3 of the report with members noting these had related to old debts incurred between 1994 – 2010 with the grounds for write off being they were either uneconomic to collect, were irrecoverable or subject to individual voluntary arrangements. Members also noted the detailed breakdown of the amendments made to the Ethical Debt Recover Policy, as detailed within section 3.9 and Appendix 4 of the report.

Councillor M.Butt in summing up, felt it was important to highlight that the approach towards dealing with debtors remained fundamentally unchanged in that the Council would continue to engage with and support vulnerable residents experiencing financial hardship whilst also continuing to pursue debt where individuals had made the choice not to pay until it was unviable to do so. Pending the outcome of the review into the level of debt write off it was felt appropriate to report to Cabinet, it was noted the intention to provide regular ongoing updates for Cabinet moving forward.

In considering the recommendations, Cabinet noted the information provided within the exempt appendix accompanying the report and it was **RESOLVED** to:

- (1) Note the revised arrangements for the write-off of bad debts, as set out in Appendix 2 of the report.
- (2) Note the debt write-offs over £3,000 listed in Appendix 3 of the report and that these largely related to old debts from 1994 to 2010.
- (3) Note that while there was a requirement to report write-offs over £3,000 to Cabinet this was the first report of this kind since the recommendation in the Council's Internal Audit report of June 2019 as set out in Appendix 1 of the report.
- (4) Note the revised debt policy referred to as Ethical Debt Policy that had been updated and approved by the Strategic Director for Customer and Digital Services to include reference to the new Breathing Space requirements as set out in Appendix 4 of the report.

16. **Exclusion of Press and Public**

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


17. **Any other urgent business**

None.

The meeting ended at 10.55 am

COUNCILLOR MUHAMMED BUTT
Chair

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	Cabinet 14 th June 2021
	Report from the Director of Finance
Treasury Management Outturn Report 2020/21	

Wards Affected:	All
Key or Non-Key Decision:	Key
Open or Part/Fully Exempt: <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Open
No. of Appendices:	Three Appendix 1 – Debt and Investment Portfolio Appendix 2 – Prudential Indicators Appendix 3 – Internal Investments: Average Rate vs Credit Risk
Background Papers:	Treasury Management Strategy Report to Council – 19 February 2020
Contact Officer(s): <small>(Name, Title, Contact Details)</small>	Amanda Healy Head of Finance Tel: 020 8937 5912 amanda.healy@brent.gov.uk Homun Bui Senior Finance Analyst Tel: 020 8937 3745 homun.bui@brent.gov.uk

1. Introduction

- 1.1 This report updates members on Treasury Management activity and confirms that the Council has complied with its Prudential Indicators for 2020/21.

2. Recommendations

- 2.1 Cabinet is asked to consider and note the 2020/21 Treasury Management outturn report and asked that it be forwarded to Full Council for approval, in

compliance with CIPFA's Code of Practice on Treasury Management (the Code).

- 2.2 Note that for 2020/21 the Council has complied with its Prudential Indicators which were approved by Full Council on 19 February 2020 as part of the Council's Treasury Management Strategy Statement and Capital Strategy Statement.

3. Background

- 3.1 The Council's treasury management activity is underpinned by the CIPFA Code, which requires authorities to produce annually Prudential Indicators and a Treasury Management Strategy Statement on the likely financing and investment activity. The Code also recommends that members are informed of treasury management activities at least twice a year.
- 3.2 This report also fulfils the Council's obligations under the Local Government Act 2003 to have regard to both the CIPFA Code and the CLG Investment Guidance.
- 3.3 The Council has borrowed money over the long term to support investment in the Council's infrastructure and also invests cash balances held for short periods. It is therefore exposed to financial risks including the loss of invested funds and the revenue effect of changing interest rates. The successful identification, monitoring and control of risk are central to the Council's treasury management strategy.

Economic Background

- 1.4 The coronavirus pandemic dominated 2020/21. The start of the financial year saw many central banks cutting interest rates as lockdowns caused economic activity to grind to a halt. The Bank of England cut Bank Rate to 0.1% and the UK government provided a range of fiscal stimulus measures, the size of which has not been seen in peacetime.
- 1.5 Some good news came in December 2020 as two COVID-19 vaccines were given approval by the UK Medicines and Healthcare products Regulatory Agency (MHRA). The UK vaccine rollout started in earnest; over 31 million people had received their first dose by 31st March.
- 1.6 A Brexit trade deal was agreed with only days to spare before the 31st December 2020 deadline having been agreed with the European Union on Christmas Eve.

- 1.7 The Bank of England (BoE) held Bank Rate at 0.1% throughout the year but extended its Quantitative Easing programme by £150 billion to £895 billion in November 2020. In its March 2021 interest rate announcement, the BoE noted that while GDP would remain low in the near-term due to COVID-19 lockdown restrictions, the easing of these measures means growth is expected to recover strongly later in the year. Inflation is forecast to increase in the near-term and while the economic outlook has improved there are downside risks to the forecast, including from unemployment which is still predicted to rise when the furlough scheme is eventually withdrawn.
- 1.8 Government initiatives supported the economy and the Chancellor announced in the 2021 Budget a further extension to the furlough (Coronavirus Job Retention) scheme until September 2021. Access to support grants was also widened, enabling more self-employed people to be eligible for government help. Since March 2020, the government schemes have helped protect more than 11 million jobs.
- 1.9 Despite the furlough scheme, unemployment still rose. Labour market data showed that in the three months to January 2021 the unemployment rate was 5.0%, in contrast to 3.9% recorded for the same period 12 months ago. Wages rose 4.8% for total pay in nominal terms (4.2% for regular pay) and was up 3.9% in real terms (3.4% for regular pay). Unemployment is still expected to increase once the various government job support schemes come to an end.
- 1.10 Inflation has remained low over the 12 month period. Latest figures showed the annual headline rate of UK Consumer Price Inflation (CPI) fell to 0.4% year/year in February, below expectations (0.8%) and still well below the Bank of England's 2% target. The ONS' preferred measure of CPIH which includes owner-occupied housing was 0.7% year/year (1.0% expected).
- 1.11 After contracting sharply in Q2 (Apr-Jun) 2020 by 19.8% q/q, growth in Q3 and Q4 bounced back by 15.5% and 1.3% respectively. The easing of some lockdown measures in the last quarter of the calendar year enabled construction output to continue, albeit at a much slower pace than the 41.7% rise in the prior quarter. When released, figures for Q1 (Jan-Mar) 2021 are expected to show a decline given the national lockdown.

Financial markets

- 1.12 Monetary and fiscal stimulus helped provide support for equity markets which rose over the period, with the Dow Jones beating its pre-crisis peak on the back of outperformance by a small number of technology stocks. The FTSE indices performed reasonably well during the period April to November, before being buoyed in December by both the vaccine approval and Brexit deal, which helped give a boost to both the more internationally focused FTSE 100 and the

more UK-focused FTSE 250, however they remain lower than their pre-pandemic levels.

- 1.13 Ultra-low interest rates prevailed throughout most of the period, with yields generally falling between April and December 2020. From early in 2021 the improved economic outlook due to the new various stimulus packages (particularly in the US), together with the approval and successful rollout of vaccines, caused government bonds to sell off sharply on the back of expected higher inflation and increased uncertainty, pushing yields higher more quickly than had been anticipated.
- 1.14 The 5-year UK benchmark gilt yield began the financial year at 0.18% before declining to -0.03% at the end of 2020 and then rising strongly to 0.39% by the end of the financial year. Over the same period the 10-year gilt yield fell from 0.31% to 0.19% before rising to 0.84%. The 20-year declined slightly from 0.70% to 0.68% before increasing to 1.36%.
- 1.15 1-month, 3-month and 12-month SONIA bid rates averaged 0.01%, 0.10% and 0.23% respectively over the financial year.

Local Context

- 1.16 On 31st March 2020, the Council had borrowing of £598.8m arising from its revenue and capital income and expenditure. The table below summarises the Council's borrowing activity during 2020/21. The Council's underlying need to borrow as measured by the Capital Financing Requirement (CFR) was £928.1m at 31/03/2021 and had net borrowing of £659.1m.

Table 1: CFR and Borrowing Summary

	Balance on 01/04/2020	Borrowing Repaid	New Borrowing	Balance on 31/03/2021	Average Rate	Average Life
	£m	£m	£m	£m	%	Years
CFR	821.8			928.1		
Short Term Borrowing	133.0	(158.0)	142.0	117.0	0.21%	0.54
Long Term Borrowing	465.8	(3.7)	80.0	542.1	3.96%	31.6
TOTAL BORROWING	598.8	(161.7)	222.0	659.1		

- 1.17 Internal borrowing is a treasury management practice whereby the Council utilises its cash balances on a temporary basis until the original plans for the cash falls due. This delays the need to borrow externally and as a result the net borrowing for 2020/21 was £269m lower than the Capital Finance Requirement.

- 1.18 In November 2020 the PWLB published its response to the consultation on 'Future Lending Terms'. From 26th November the margin on PWLB loans above gilt yields was reduced from 1.8% to 0.8% providing that the borrowing authority can confirm that it is not planning to purchase 'investment assets primarily for yield' in the current or next two financial years. Councils that are purchasing or intending to purchase investment assets primarily for yield will not be able to access the PWLB except to refinance existing loans or externalise internal borrowing. As part of the borrowing process Councils will now be required to submit more detailed capital expenditure plans with confirmation of the purpose of capital expenditure from the Section 151 Officer. The PWLB can now also restrict local authorities from borrowing in unusual or large amounts.
- 1.19 With short-term interest rates remaining much lower than long-term rates, the Council considered it more cost effective in the near term to utilise a mixture of short-term loans and long-term loans throughout the year to fund the borrowing requirement.
- 1.20 The Council is not planning to purchase any investment assets primarily for yield within the next three years and so is able to take advantage of the reduction in the PWLB borrowing rate, as a result the Council secured an additional £80m of long term borrowing from PWLB at a rate of 1.64% to support its activities in March 2021.
- 1.21 The detailed borrowing portfolio for the Council is shown in table 2 below.

Table 2: Borrowing Position

	Balance on 01/04/2020	Net Movement	Balance on 31/03/2021	Average Rate	Average Life
	£m	£m	£m	%	(years)
Public Works Loan Board	300.3	76.3	376.6	4.23%	29.3
Banks (LOBO)	70.5	0.0	70.5	4.64%	43.9
Banks (fixed-term)	15.0	0.0	15.0	4.27%	36.3
Other (fixed-term)	80.0	0.0	80.0	2.01%	22.5
Local authorities (short-term)	133.0	(16.0)	117.0	0.21%	0.54
TOTAL BORROWING	598.8	60.3	659.1		

- 1.22 The Council has £70.5m exposure to LOBO loans - Lender's Option Borrower's Option of which £41m of these can be "called" during 2020/21. Under the LOBO arrangements lenders can exercise their rights at set times to amend the

interest rate on the loan. At that point, the Borrower can accept the revised terms or reject them and repay the loan without penalty. LOBO loans present a potential refinancing risk to the Council since the decision to call a LOBO is entirely at the lender's discretion. This risk is mitigated by the fact that the Council's current cash holdings mean that any repayment could be accommodated by reducing deposits. Due to the current low interest rates, no banks exercised their option during the year.

- 1.23 The Council undertakes a regular review to identify any potential gain on refinancing. In the latest review, due to the current low interest rate environment, there is no financial gain for the Council to refinance the existing debt on the same terms as the premium costs are greater than the reduction in the new loan rate.

Investment Activity

- 1.24 The Council holds invested funds, representing income received in advance of expenditure plus balances and reserves held. During the year, the Council's investment balances ranged between £18m and £182m due to timing differences between income and expenditure.
- 1.25 Both the CIPFA Code and government guidance require the Council to invest its funds prudently, and to have regard to the security and liquidity of its treasury investments before seeking the optimum rate of return, or yield. The Council's objective when investing money is to strike an appropriate balance between risk and return, minimising the risk of incurring losses from defaults and the risk of receiving unsuitably low investment income. The table below summarises investment activity during 2020/21.

	Balance on 01/04/2020	Investments made	Investments repaid	Balance on 31/03/2021	Average Rate	Average Life
	£m	£m	£m	£m	%	Days
Fixed term deposits	0.2	20.0	(0.2)	20.0	0.01%	32
Deposits with the UK DMO	104.7	3,102.6	(3,207.3)	(0.0)	0.07%	2
Money Market Funds and notice deposits	5.0	702.3	(624.6)	82.7	0.06%	
TOTAL INVESTMENTS	109.9	3,824.9	(3,832.1)	102.7	0.06%	32

- 1.26 Security of capital remained the Council's main investment objective. This was maintained by following the Council's counterparty policy as set out in its Treasury Management Strategy Statement for 2020/21 which defined "high credit quality organisations" as those having a long-term credit rating of A- or higher that are domiciled in the UK or overseas where the sovereign rating is AA+ or higher.
- 1.27 Throughout the first three months of the pandemic, the Council moved the majority of its investments into highly secure deposits with the UK Debt Management Account Deposit Facility whilst the impact of financial markets was uncertain. The investments are made for a fixed duration to ensure liquidity. This has led to a high value of investments made and repaid during the first half of the year. The Council also maintained £5m in high quality money market funds to ensure liquidity for urgent payments including procuring Personal Protective Equipment (PPE). As markets stabilised, the Council moved its investment balance back into money market funds.
- 1.28 The return on Money Market Funds net of fees also fell over the six months and for many funds net returns range between 0% and 0.1%. In many instances, the fund management companies have temporarily lowered or waived fees to maintain a positive net return.
- 1.29 The inter-local authority market has remained above zero throughout the year but rates have remained extremely low. There is limited availability for investments with local authorities for less than one-month so the Council utilised money market funds to manage these short-term differences between income and expenditure.
- 1.30 There was a downward movement in short-term investments throughout the year the Council's existing short-term borrowing matured and the Council's internal resources were utilised. The new borrowing undertaken in March 2021 has brought this balance back to similar levels as the closing position last year.

Credit developments and credit risk management

- 1.31 During the year credit developments include Moody's downgrading the UK sovereign rating to Aa3 with a stable outlook which then impacted a number of other UK institutions, banks and local government.
- 1.32 The vaccine approval and subsequent rollout programme are both credit positive for the financial services sector in general, but there remains much uncertainty around the extent of the losses banks and building societies will suffer due to the economic slowdown which has resulted due to pandemic-related lockdowns and restrictions. The institutions and durations on the Council's counterparty list recommended by our treasury management advisors

Arlingclose remain under constant review, but at the end of the period no changes had been made to the names on the list or the recommended maximum duration of 35 days.

- 1.33 The Council is holding funds across a range of money market funds and a short term deposit in a local authority at the end of the year to maintain a diverse portfolio and ensure availability of cash for unexpected payments.

Yield

- 1.34 The Council's average cash balance during 2020/21 was £82.2m and interest earned was £0.04m, an average return of 0.05% (2019/20 – average cash balance of £85.2m and interest earned was £0.7m or 0.83%). The low rates of return on the Council's short-dated money market investments reflect prevailing market conditions and the Council's objective during 2020/21 of optimising returns commensurate with the principles of security and liquidity. The Council had sufficient capacity within the Capital Financing Budget to cover the reduction in investment income whilst benefitting from the reduction in short-term borrowing costs.
- 1.35 The Council only had exposure to negative interest rates for one deposit held overnight with the UK DMO in December 2020. The deposit was made as part of our contingency arrangements due to a system issue on the day. The loss incurred on this deposit was £43.
- 1.36 In response to the coronavirus pandemic, the Bank of England's Monetary Policy Committee (MPC) cut official interest rates to a new all-time low of 0.1% in March 2020. The market had seen a significant downward trend from February 2020 onwards, which affected the investment return throughout 2020/21.

Update on Investments with Icelandic Banks

- 1.37 The Council recovered 98% of its £10 million deposit with Heritable Bank. The investment concluded in 20/21 with a final repayment of £95k received in July 2021.

Compliance

- 1.38 The Council confirms that it has complied with its Prudential Indicators for 2020/21, which were approved by the Council on 19 February 2020 as part of the Council's Treasury Management Strategy Statement.
- 1.39 In accordance with the requirements of the CIPFA Code of Practice this report provides members with a summary report of the treasury management activity during 2020/21. None of the Prudential Indicators have been breached and a

prudent approach has been taken in relation to investment activity with priority being given to security and liquidity over yield.

Further information is set out in Appendix 1, 2 and 3.

Investment Training

- 3.34 The needs of the Council's treasury management staff for training in investment management are kept under review and considered as part of the staff appraisal process, and additionally when the responsibilities of individual members of staff change.
- 3.35 During 2020/21 staff attended training courses, seminars and conferences provided by both Arlingclose, CIPFA and a variety of other organisations.

4. Financial Implications

- 4.1 Already noted within the report as this is the Treasury Management Outturn Report.

5. Legal Implications

- 5.1 None identified.

6. Diversity Implications

- 6.1 None identified.

7. Staffing Implications

- 7.1 None identified.

Report sign off:

MINESH PATEL
Director of Finance

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Appendix 1

Debt and Investment Portfolio Position 31/03/2021

	Actual Portfolio as at 31/03/2021 £m	Average Rate as at 31/03/2021 %
External Borrowing:		
PWLB - Maturity	282.0	5.7
PWLB - Equal Instalments	94.7	2.3
Fixed Rate Market Loans	95.0	4.3
LOBO Loans	70.5	4.6
Short-term Loans	117.0	0.2
Total External Borrowing	659.1	3.3
Other Long Term Liabilities:		
PFI	24.0	9.5
Finance Lease	2.4	4.1
Total Long Term Liabilities	26.5	9.0
Total Gross External Debt	685.6	3.5
Investments:		
Deposits	20.2	0.1
Money Market Funds	82.7	0.5
Total Investments	102.9	0.4
Net Debt	582.7	

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Appendix 2

Prudential Indicators

(a) Capital Financing Requirement (CFR)

The Council's cumulative maximum external borrowing requirement for 2020/21 is shown in the table below:

Capital Financing Requirement	31/03/2021 Estimate £m	31/03/2021 Actual £m
General Fund	686.7	683.0
HRA	283.2	245.1
Total CFR	969.9	928.1

(b) Gross Debt and the Capital Financing Requirement

In order to ensure that over the medium term debt will only be for a capital purpose, the Council should ensure that debt does not, except in the short term, exceed the total of capital financing requirement in the preceding year plus the estimates of any additional capital financing requirement for the current and next two financial years. This is a key indicator of prudence.

Debt	31/03/2021 Estimate £m	31/03/2021 Actual £m
Borrowing	673.4	659.1
PFI Liabilities	24.0	24.0
Total Debt	697.4	683.1
Capital Financing Requirement	969.9	928.1
Borrowing in excess of CFR?	No	No

(c) Authorised Limit and Operational Boundary for External Debt

The Operational Boundary for External Debt is based on the Council's estimate of most likely, i.e. prudent, but not worst case scenario for external debt. It links directly to the Council's estimates of capital expenditure, the capital financing requirement and cash flow requirements and is a key management tool for in-year monitoring.

Other long-term liabilities comprise finance lease, Private Finance Initiative and other liabilities that are not borrowing but form part of the Council's debt.

The Authorised Limit for External Debt is the affordable borrowing limit determined in compliance with the Local Government Act 2003. It is the maximum amount of debt that the Council can legally owe. The authorised limit provides headroom over and above the operational boundary for unusual cash movements.

	Operational Boundary £m	Authorised Limit £m	Actual External Debt £m 31/03/2021
Borrowing	1,000.0	1,200.0	659.1
Other Long Term Liabilities			26.5
Total	1,000.0	1,200.0	685.6

The Director of Finance confirms that there were no breaches to the Authorised Limit and the Operational Boundary during 2020/21.

(d) Upper Limits on one-year revenue impact of a 1% movement in interest rates

This indicator is set to control the Council's exposure to interest rate risk. The impact of a change in interest rates is calculated on the assumption that maturing loans and investment will be replaced at current rates.

	2020/21 Approved Limits £m	31/03/2021 Actual £m
Upper limit on one-year revenue impact of a 1% rise in interest rates	5.0	0.2
Compliance with limits:		Yes
Upper limit on one-year revenue impact of a 1% fall in interest rates	5.0	0.2
Compliance with limits:		Yes

(e) Maturity Structure of Fixed Rate Borrowing

This indicator is to limit large concentrations of fixed rate debt needing to be replaced at times of uncertainty over interest rates. The Council uses the option date as the maturity date for its LOBO loans.

Maturity Structure of Fixed Rate Borrowing	Upper Limit	Lower Limit	Actual Fixed Rate Borrowing at 31/03/2021	% of Fixed Rate Borrowing at 31/03/2021	Compliance with set limits?
	%	%	£m	%	Yes / No
Under 12 months	40%	0%	127	19%	Yes
12 months and within 24 months	40%	0%	11	2%	Yes
24 months and within 5 years	40%	0%	17	3%	Yes
5 years and within 10 years	60%	0%	24	4%	Yes
10 years and within 20 years	75%	0%	94	14%	Yes
20 years and within 30 years	75%	0%	102	15%	Yes
30 years and within 40 years	75%	0%	224	34%	Yes
40 years and within 50 years	75%	0%	56	8%	Yes
50 years and above	75%	0%	5	1%	Yes
			659.1	100%	

(f) Capital Expenditure

This indicator is set to ensure that the level of proposed capital expenditure remains within sustainable limits and, in particular, to consider the impact on Council tax and in the case of the HRA, housing rent levels.

Capital Expenditure	31/03/2021 Estimate £m	31/03/2021 Actual £m
General Fund	173.0	111.8
HRA	92.1	59.8
Total	265.1	171.6

(g) Ratio of Financing Costs to Net Revenue Stream

This is an indicator of affordability and highlights the revenue implications of existing and proposed capital expenditure by identifying the proportion of the revenue budget required to meet financing costs, net of investment income.

Ratio of Financing Costs to Net Revenue Stream	31/03/2021 Estimate	31/03/2021 Actual
Financing costs Proportion of net revenue stream (%)	14.9 5.6%	17.7 4.5%

(h) Adoption of the CIPFA Treasury Management Code

This indicator demonstrates that the Council adopted the principles of best practice.

Statement: The Council adopted the Chartered Institute of Public Finance and Accountancy's Treasury Management in the Public Services: Code of Practice 2011 (2017 Edition).

(i) Upper Limit for Total Principal Sums Invested Over 364 Days

The purpose of this limit is to contain exposure to the possibility of loss that may arise as a result of the Council having to seek early repayment of the sums invested.

Upper Limit for Total Principal Sums Invested Over 364 Days	31/03/2021 Approved	31/03/2021 Actual
	£m	£m
Limit on principal invested beyond a year	500	0

(j) Security

The Council has adopted a voluntary measure of its exposure to credit risk by monitoring the value-weighted average credit rating of its investment portfolio. This is calculated by applying a score to each investment (AAA=1, AA+=2, etc.) and taking the arithmetic average, weighted by the size of each investment. Unrated investments are assigned a score based on their perceived risk.

Credit Risk Indicator	31/03/2021 Target	31/03/2021 Actual
Portfolio average credit rating	A	A+

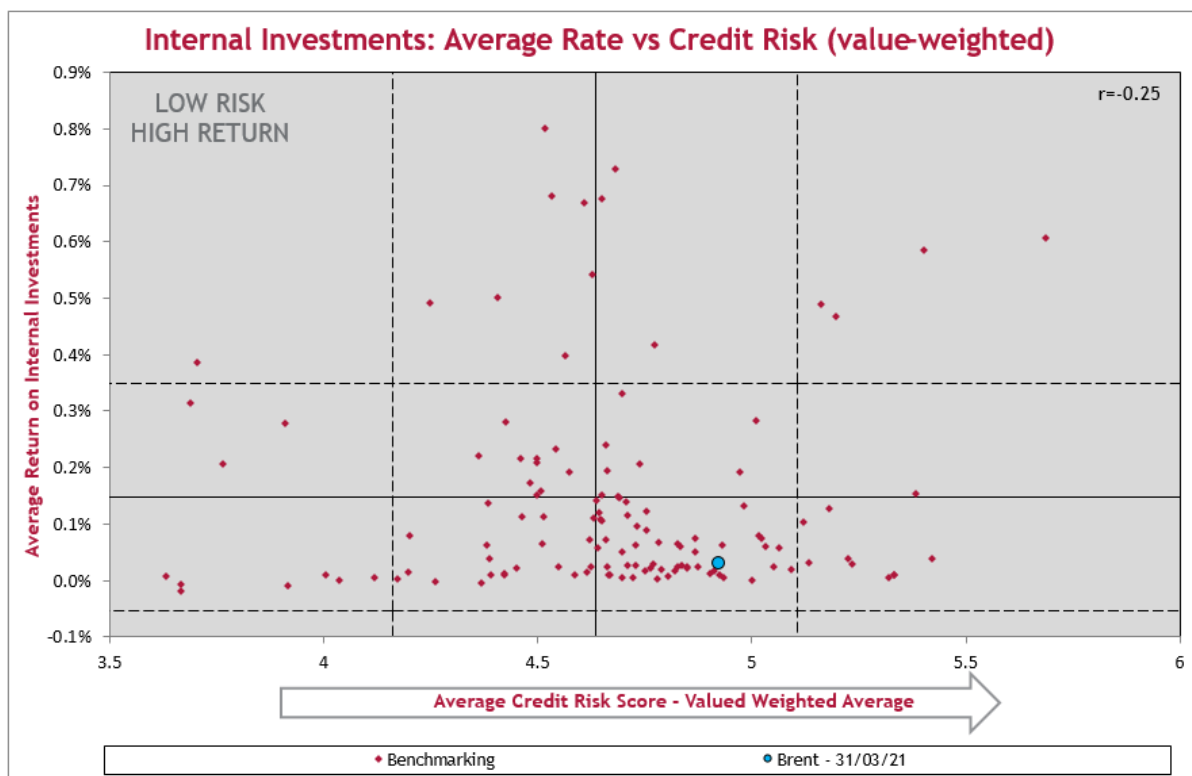
(k) Liquidity

The Authority has adopted a voluntary measure of its exposure to liquidity risk by monitoring the amount of cash available to meet unexpected payments within a rolling three-month period, without additional borrowing.


Liquidity Risk Indicator	31/03/2021 Target £m	31/03/2021 Actual £m
Total cash available within 3 months	20.0	102.7

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Internal Investments: Average Rate vs Credit Risk as at 31/03/2021



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	Cabinet 14 th June 2021
	Report from the Strategic Director of Regeneration & Environment
Neasden Stations Growth Area Masterplan	

Wards Affected:	Dollis Hill, Dudden Hill, Welsh Harp and Willesden Green
Key or Non-Key Decision:	Key
Open or Part/Fully Exempt: <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Open
No. of Appendices:	Two Appendix 1 - Draft NSGA Masterplan SPD Appendix 2 - Final Equalities Analysis
Background Papers:	Draft Brent Local Plan https://www.brent.gov.uk/media/16415859/core_01-regulation-19-draft-brent-local-plan.pdf
Contact Officer(s): <small>(Name, Title, Contact Details)</small>	<p>Alice Lester Operational Director Regeneration Tel: 020 89376441 Alice.Lester@brent.gov.uk</p> <p>Jonathan Kay Head of Regeneration Tel: 020 8937 2348 Jonathan.Kay@brent.gov.uk</p> <p>Ciara Whelehan Spatial Planning Manager Tel: 020 8937 6473 Ciara.Whelehan@brent.gov.uk</p> <p>Pratibha Bhatt Regeneration Masterplanner Tel: 07436 704314 Pratibha.Bhatt@brent.gov.uk</p>

1.0 Purpose of the Report

- 1.1 To present to Cabinet the draft Neasden Stations Growth Area Masterplan Supplementary Planning Document (NSGA Masterplan SPD) for approval for publication and statutory consultation.

2.0 Recommendation(s)

- 2.1 To approve the draft Neasden Stations Growth Area Masterplan Supplementary Planning Document (NSGA Masterplan SPD) for publication and statutory consultation.

3.0 Detail

Background

- 3.1 Brent Full Council last year approved submission of Brent's draft Local Plan to the Planning Inspectorate. Examination took place over Autumn 2020, and adoption of the new Local Plan is forecast for Summer 2021. The Plan sets out the vision and policies for development in the borough to 2041, including 29,150 new homes from 2019/20 to 2028/29. Key to accommodating an increasing population are 8 growth areas, viewed as the most sustainable spatial expression for growth, exploiting brownfield land, good access to public transport and higher densities to deliver the majority of new homes alongside regeneration benefits and infrastructure.
- 3.2 Neasden Stations Growth Area (NSGA) comprises 11.5 hectares of land around Neasden Underground Station, characterised by low-density commercial, light industrial, storage and waste management uses, and the underutilised College of North West London site. Brent's draft Local Plan identifies the potential for NSGA to join the proposed West London Orbital line and accommodate a new mixed-use neighbourhood with the capacity to deliver business growth and jobs, infrastructure and at least 2,000 new homes. Before any redevelopment can be permitted however, the Plan requires a Masterplan be put in place to ensure comprehensive regeneration that maximises the opportunity for local residents, businesses and communities.

Neasden Stations Growth Area Masterplan SPD

- 3.3 Since late 2019 officers have worked to develop the draft NSGA Masterplan SPD (Appendix 1) in-house, in partnership with the Greater London Authority, and in consultation with a range of partners and stakeholders including the West London Alliance, Transport for London and local landowners and developers.
- 3.4 The draft NSGA Masterplan SPD sets out the vision and objectives for transformational change of the area, the planning policy framework to which new development will be expected to comply, and baseline spatial analysis of the current state and land use of the area which must provide the foundation for any regeneration. The document tests various planning policy compliant growth capacity scenarios, demonstrating feasible outline proposals for mixed use redevelopment, minimum re-provision of existing industrial floorspace, and 2,000 to 3,000 new homes. All options safeguard land and access to the proposed West London Orbital (WLO) station, and provision of the WLO is

observed to supports the maximum employment, housing, infrastructure and regeneration benefits for the area. Delivery, phasing and viability testing confirms the masterplan options to be broadly viable, and able to achieve affordable housing targets over the development plan period.

- 3.5 Per the draft Local Plan, the NSGA Masterplan SPD is required to provide clarity and detailed guidance for new developments, inform the assessment of planning applications, and to be a material consideration for future planning decisions in the area. As such, the SPD document sets out a robust urban design framework comprising development, placemaking and environmental and sustainability principles. Together these principles are designed to ensure new development unlocks the potential of the area coherently and comprehensively, creates a place where people choose to live, learn, work and relax, and adheres to the environmental standards required to support climate change resilience and transition to net zero carbon. Further detailed guidance is also provided regarding the planning process for new development schemes, and illustrative case studies of urban design best practice. To ensure the SPD remains relevant over the Local Plan period, the Council will be expected to review the document every 5 years.
- 3.6 In order to advance the draft NSGA Masterplan SPD towards adoption, statutory public consultation of not less than 4 weeks will be required. Consistent with the approach the Council has taken with other SPDs, it is recommended that the draft NSGA Masterplan SPD be made available for public consultation for a period of 6 weeks. Subject to consideration of all representations and any necessary amendments, and a transport assessment of NSGA impacts on the Strategic Road Network, the final NSGA Masterplan SPD would then be returned to Members for adoption and publication.

4.0 Financial Implications

- 4.1 NSGA Masterplan SPD costs are being met from a Greater London Authority Homebuilder Capacity Fund grant and existing Regeneration budgets.

5.0 Legal Implications

- 5.1 Town and Country Planning (Local Planning) (England) Regulations provide for Local Planning Authorities to adopt Supplementary Planning Documents. These documents are to provide more detailed guidance on how a development plan policy will be interpreted in the determination of planning applications. Supplementary Planning Documents cannot introduce new policy or allocate sites for development.

6.0 Equality Implications

- 6.1 The Equality Act 2010 introduced a new public sector equality duty under section 149. It covers the following nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. The Council must, in exercising its functions, have “due regard” to the need to:

1. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.

2. Advance equality of opportunity between people who share a protected characteristic and those who do not.
3. Foster good relations between people who share a protected characteristic and those who do not.

- 6.2 Equality Analysis (Appendix 2) is attached and indicates the draft NSGA Masterplan SPD would be expected to have positive impacts on existing and new communities alike, including specific identified positive impacts for people of different age groups and people with disabilities.

7.0 Consultation with Ward Members and Stakeholders

- 7.1 The Lead Member for Regeneration, Property and Planning has been regularly briefed on the development of the draft NSGA Masterplan SPD.
- 7.2 Ward councillors from Dollis Hill, Dudden Hill, Welsh Harp and Willesden Green wards have been consulted on the draft NSGA Masterplan SPD. Stakeholder consultation has included the Greater London Authority, West London Alliance, Transport for London, local landowners (including the College of North West London) and developers. The Design Council have peer reviewed the draft NSGA Masterplan SPD. The Council Management Team have reviewed the draft NSGA Masterplan SPD.
- 7.4 Statutory public consultation, to start as soon as practical post Cabinet approval, for a period of 6 weeks, will provide further opportunities for engagement with partners, stakeholders, local residents, businesses and communities.

8.0 Human Resources/Property Implications (if appropriate)

- 8.1 Regeneration has developed the draft NSGA Masterplan SPD in-house.

Report sign off:

ALAN LUNT

Strategic Director of Regeneration &
Environment

NEASDEN STATIONS GROWTH AREA

DRAFT MASTERPLAN SUPPLEMENTARY PLANNING DOCUMENT, JUNE 2021

SUPPORTED BY
MAYOR OF LONDON



Neasden Stations Growth Area

Masterplan Supplementary Planning Document

Neasden Stations Growth Area (NSGA) is a priority growth area in Brent's emerging Local Plan. This Supplementary Planning Document (SPD) sets out the Vision, Urban Design Principles and Policy Framework for NSGA to inform and assess future applications for development in the area, and bring forward comprehensive benefits for its communities.

Note: The NSGA Masterplan SPD should be seen as a long term indicative vision (over 20+ years). The plan(s) will therefore be subject to periodic review, change and refinement over the long term. Every effort has been made to ensure plans are correct at time of publishing.

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MASTERPLAN SPD CONSULTATION DRAFT

Working closely with local communities has been increasingly important for the London Borough of Brent. The Council's Borough Plan strongly commits to community engagement as one of its five strategic themes: "Strong Foundations", aiming to strengthen existing relationships and build new ones by engaging effectively with communities and increasing resident satisfaction and involvement.

The Council believes that local people should have as much clarity as is practical on the process of the Neasden Stations Growth Area Masterplan SPD and welcomes public engagement, including with local residents, community groups and businesses. Transparent communication that is responsive to local people's needs is crucial to ensure everyone is informed, has fair access and representation through the local decision-making process, and can contribute to and influence the transformation of the area. The consultation process will provide developers, landowners, local businesses and residents, as well as relevant internal and external stakeholders and partners, opportunity to participate in different ways, at both online and face to face events (subject to Government guidelines on Covid-19 during the consultation period).

This Masterplan SPD is being published for consultation to allow the wider public and interest groups to review and comment upon its content. The Council will raise awareness through the Brent magazine, website, social media and other publicity materials. The consultation will be online and offline with materials disseminated across a variety of platforms and in a variety of formats. The team will also make hard copies of the documents available for review and comment at Council buildings, such as Brent Civic Centre and Willesden Library. The draft Masterplan SPD, along with the comment form and relevant information, will be published on the Council's dedicated web page.

This Masterplan SPD will be subject to at least six weeks formal consultation following Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012, and will be held in line with the Council's Statement of Community Involvement. Once adopted, this Masterplan SPD will be published alongside an Adoption Statement and Consultation Statement setting out the comments received and the Council's response. These documents will be available to view on the Council's website.

STAKEHOLDER ENGAGEMENT

Engagement Process:

Brent Council has developed a Statement of Community Involvement (SCI), adopted in July 2017. The Statement explains how the Council will involve local communities and other interested parties when prepare planning policies and determine planning applications. The Council will also publish:

- Document and details of how to respond (SPD Matters) in Phase 3;
- Consultation Statement setting out consultations to date in Phase 4;
- SPD Adoption Statement announcing the adoption of the masterplan at the end of Phase 4.

This Masterplan SPD has been developed through ongoing consultation with several key stakeholders, though wider public participation has been limited by the Covid-19 pandemic. Masterplan capacity testing commenced in early 2020 and coincided with the introduction of government restrictions, making it difficult to engage the local community in the masterplanning process at that stage. As such, the Council is committed to re-engaging the local community during a six week period as part of the statutory consultation process.

Outputs and deliverables have been supported by technical inputs from various in-house teams including Planning, Placemaking, Transport, Policy, Infrastructure, Environment, Housing and Regeneration. A series of meetings and discussions were also held with representatives from the GLA, TfL, WLA, WLO and other statutory bodies, alongside direct engagement with landowners, developers and local councillors. External technical inputs, such as topographical, utilities and flood risk surveys have informed the masterplan capacity studies, whilst a viability assessment has appraised the development potential and deliverability.

Engagement Methods:

Communication

The Council will place notices on its website (<https://www.brent.gov.uk/>), informing residents what documents are available for comments and how feedback can be provided. The adverts will provide details around:

- What the Neasden Stations Growth Area Masterplan SPD is;
- Where and when interested parties can view it, obtain or view copies and make comments;
- Where and how to send comments and representations; and
- How the Council can be contacted for questions and additional information.

Consultation Responses

The Council will consider all written comments (electronic and hard copies) and representations made during public consultation process. A Consultation Statement will set out public comments and opinions received and the Council's response to those on the NSGA Masterplan SPD will be published online and presented to Councillors.

COVID-19 Measures

The Council will regularly review plans for public engagement in line with Government's guidance for physical public events and gatherings. Should new lockdown restrictions be introduced, greater reliance on online consultation methods will be needed to guarantee public safety. The Council will consider options to host workshops and public meetings via online platforms, or may choose to pause/extend consultation activities around lockdown periods to allow for physical public consultation.

EXECUTIVE SUMMARY

We are in the midst of a climate and ecological emergency, and a global pandemic. With a growing population, the pressure on London's land to provide sustainable new homes and jobs, whilst delivering a green economic recovery, is immense. The clear, practical distinction between residential, industrial and recreational uses is now becoming more blurred and slowly disappearing.

Meeting London's housing needs is a top priority for the Mayor. Nevertheless, the London Plan 2021 recognises that other land uses, especially industrial land, are fast depleting and must be refreshed to keep pace with future demands. It therefore proposes policies to protect industrial land. It emphasises a plan-led and masterplanning approach to intensification of existing industrial sites and their co-location with residential uses to deliver both new jobs and new homes.

The opportunity is most apparent in sites that benefit from being well-connected by existing or planned Tube and rail stations, such as those located along the proposed West London Orbital (WLO) line. In this context, the area around Neasden station is identified as a key priority growth corridor within the draft Brent Local Plan. The aim is to maximise the best use of land, support the Mayor's and Council's vision, and facilitate 'good growth' for Brent.

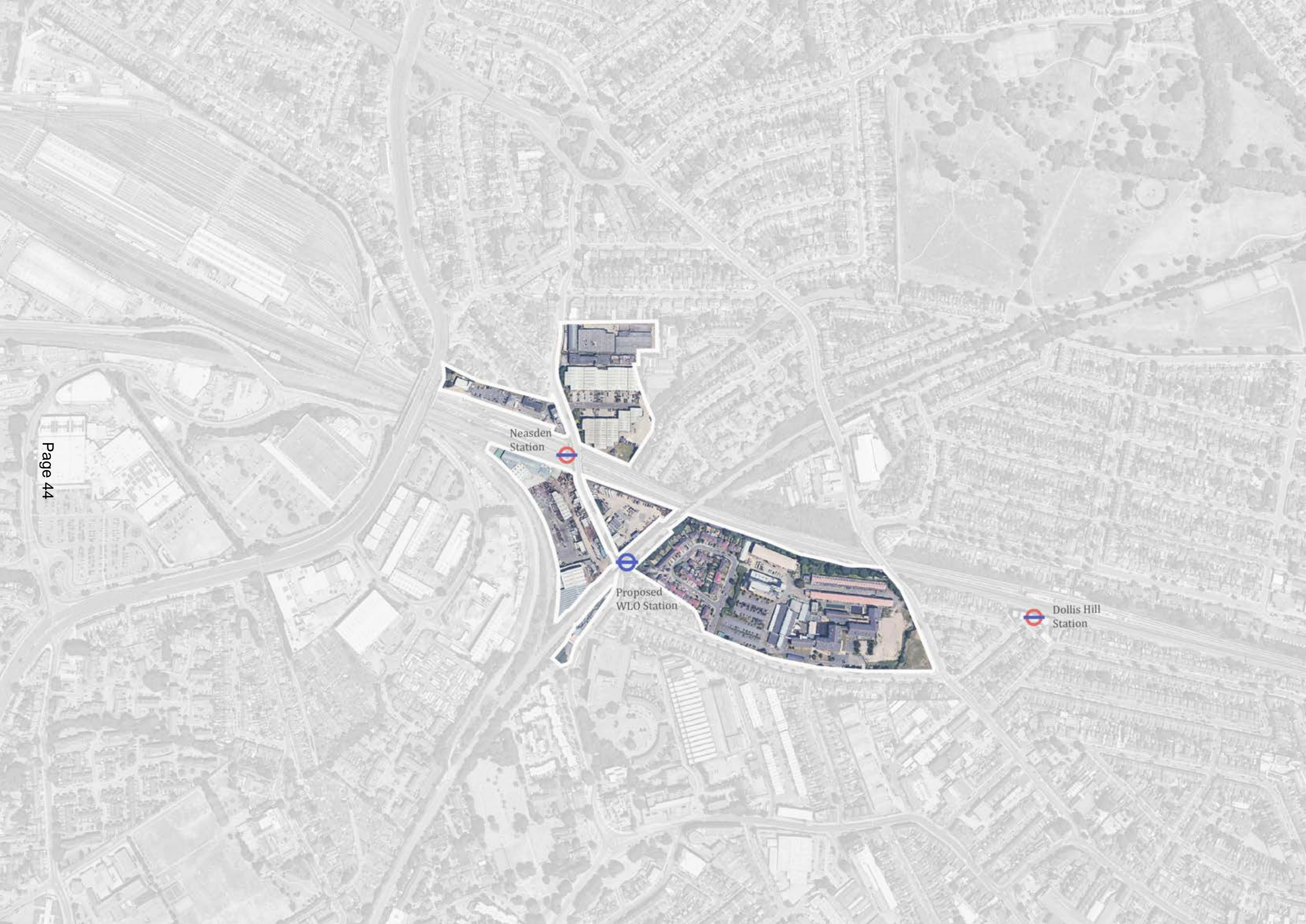
This Masterplan Supplementary Planning Document (SPD) seeks to unlock the massive potential that the Neasden Stations Growth Area (NSGA) has to offer, and define a new place for the post-pandemic world that balances local choices within the wider metropolitan context. The delivery of new workspace, improved accessibility to the wider area, an interconnected

network of green open spaces, enhanced public realm and a permeable movement network will create an inclusive neighbourhood that can support at least 2,000 new homes, and also serve as a distinctive gateway to Neasden. This Masterplan SPD sets out the overarching vision for NSGA, and the underpinning urban design framework, to help ensure that the transformation of the existing poor quality environment brings forward physical, social and economic regeneration for all the community.

This Masterplan SPD details the planning policy context and conforms to both the draft Brent Local Plan and the London Plan. By adopting a masterplanning approach, that context is translated into a clear vision and objectives for NSGA to help landowners, developers and local residents achieve comprehensive regeneration of the area and avoid the mistakes of piecemeal urban development.

The growth area, in its current form, is clearly not an effective use of land when assessed against its public transport accessibility. This Masterplan SPD proposes a strategy to refresh and extend the growth area's longevity by elevating its capacity to deliver Brent and wider London needs. It maps out the main interventions that will shape the growth area's future. Residential co-location with new industrial space will be the key that unlocks comprehensive regeneration to revitalise the area, meet housing needs, and support business growth and new, better quality jobs.

NSGA is an opportunity to make a valuable contribution to the 'good growth' agenda and ensure the realisation of both the Mayor's and Council's ambitions for the creation of an exemplary place. This Masterplan SPD sets out the vision and framework that will make it happen.



Neasden
Station

Proposed
WLO Station

Dollis Hill
Station

1. INTRODUCTION

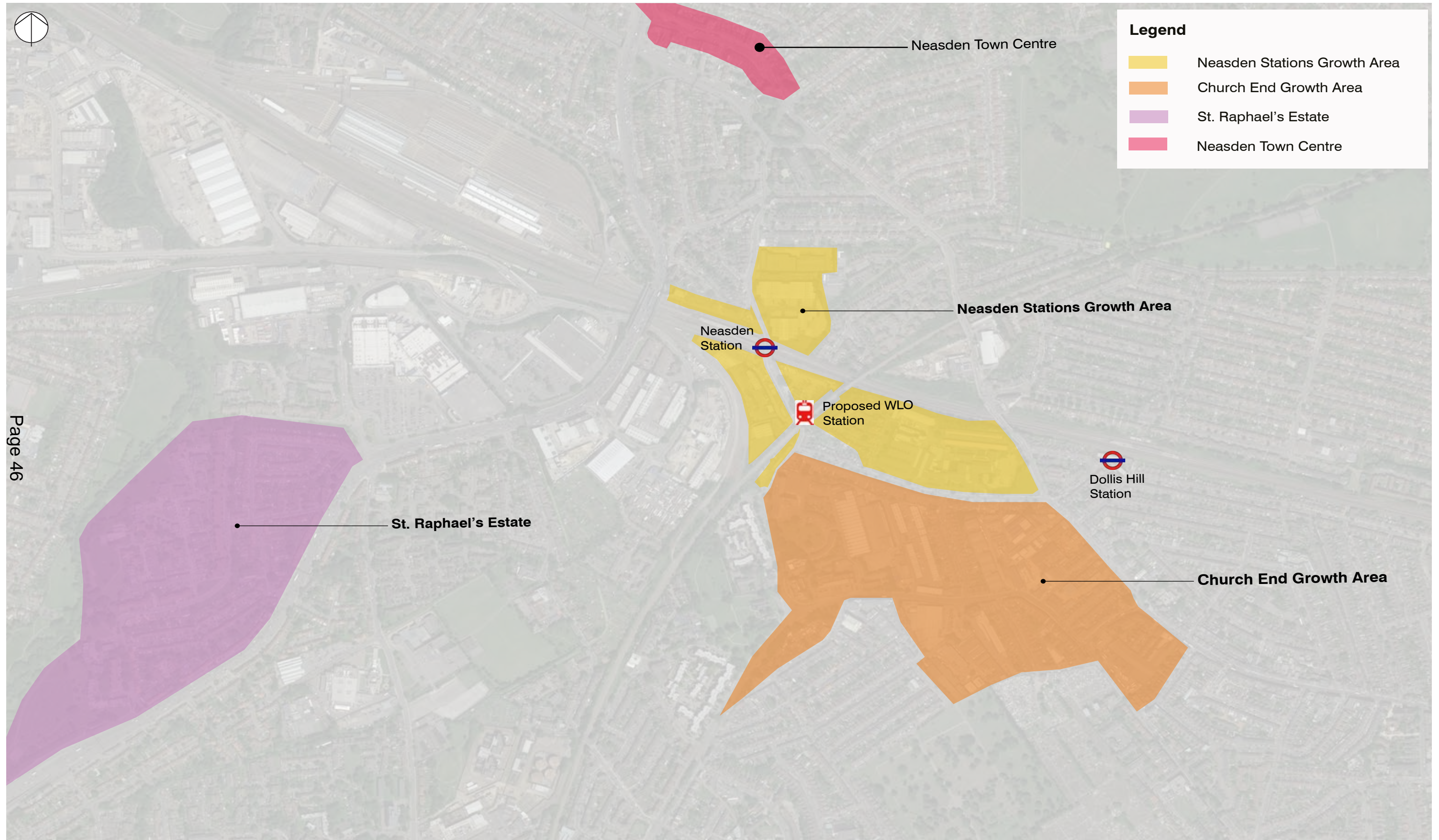


Figure 1: Wider regeneration context

1.1 BACKGROUND

1.1.1. Brent Council, in collaboration with the Greater London Authority (GLA), has prepared a SPD for the Neasden Stations Growth Area (NSGA) that identifies and maximises its development potential. The Council has designated 11.5 hectares of land around the Neasden station as a site allocation for the growth area in the draft Brent Local Plan and, as such, NSGA represents one of the most significant regeneration and development opportunities within Brent.

1.1.2. At present, NSGA is characterised by underutilised land and, at its centre, predominantly low-density industrial uses, including commercial, light industrial, storage and waste management. These uses sit alongside residential and educational uses within a poor quality townscape, severed by rail and road links that cut across the majority of the growth area. There are significant opportunities to transform NSGA into a vibrant and inclusive mixed-use neighbourhood, with high quality residential and employment uses alongside improved accessibility to the wider area, enhanced public realm, interconnected green open spaces and a more permeable movement network. **Figure 1** shows the wider context of the NSGA.

1.1.3. The draft Brent Local Plan identifies the potential for NSGA to accommodate a new station as part of the proposed West London Orbital (WLO) line, supporting the delivery of new homes and jobs to meet the Brent and wider London demand for additional housing and industrial capacity. The Mayor's Transport Strategy (MTS) proposes working towards delivering the WLO line to support 20,000 new homes across West London, whilst the Mayor's Housing Strategy supports more intensive use of land, land assembly and investment in homes and infrastructure across London.

1.2 WHY IS THIS MASTERPLAN SPD NEEDED?

1.2.1. NSGA has some complex land ownership issues. In striving to avoid the negative consequences of a piecemeal and fragmented approach to development, the Council has sought to balance the often competing and conflicting aspirations of the different external parties, and reconcile these aspirations within the policy framework established by both the London Plan 2021 and draft Brent Local Plan.

1.2.2. With development capacity and viability at NSGA contingent on several variable factors, such as the delivery of the WLO line, it has been necessary to undertake masterplan capacity studies that test a number of different scenarios. Other variable factors include the quantum of industrial uses, quantum of commercial uses, type of residential co-location and extent of development sites. As such, the Council has concluded that a Masterplan SPD demonstrating the range of dimensions within which regeneration can appropriately come forward is the most suitable way of guiding future development across the growth area. It consolidates the outcomes of the masterplan capacity studies into a robust urban design framework. This seeks to provide clarity and certainty on key requirements and outcomes. It must, however, try to provide sufficient flexibility to allow for potential changes in circumstances over a delivery period to 2041 and, on some sites, possibly beyond.

1.3 WHAT WILL THIS MASTERPLAN SPD DO?

1.3.1. To identify and maximise the development potential of the growth area, this Masterplan SPD seeks to:

- Guide the comprehensive regeneration and long-term social, economic and environmental sustainability of NSGA as defined by the draft Brent Local Plan site allocation;
- Establish the vision and objectives for NSGA;
- Set out the planning policy context that underpins the vision and objectives;
- Explore and determine the development capacity of NSGA;
- Identify and secure the physical, social, economic and other infrastructure needs such as transport, green open space, environment and sustainability requirements to support comprehensive development and good growth;
- Define a robust urban design framework to guide future development;
- Promote a masterplanning approach to avoid piecemeal development;
- Provide a basis for planning decisions and serve as a material consideration throughout the planning process.

1.3.2. This Masterplan SPD has been prepared in accordance with the provisions of the Town and Country Planning (Local Planning) (England) Regulations 2012. It has evolved through an iterative process involving key stakeholders such as the GLA, the Environment Agency, Natural England, Transport for London (TfL), West London Alliance (WLA), landowners, developers, Officers and Members of the Council, infrastructure providers and local people and community groups. It aims to balance the aspirations and objectives of all of these groups with acknowledged best practice development, placemaking and sustainability principles.

1.4 WHO SHOULD USE THIS MASTERPLAN SPD?

1.4.1. This Masterplan SPD has been prepared for use by a range of different people involved in the development process including:

- Applicants – those seeking planning permission to make improvements to their homes or business premises;
- Councillors – those supporting their communities or making decisions about new development in the borough;
- Developers and landowners – those companies or individuals seeking to bring forward new development in the borough;
- Local residents – those who may be concerned about or interested in new development in their neighbourhood;
- Officers – those guiding new development in the borough; and
- Professionals – planners, architects, designers, agents and other consultants working on behalf of developers and landowners.



2. NEASDEN REIMAGINED

2.1 OUR VISION

2.1.1. Neasden Stations Growth Area will be a unique place where people choose to live, learn, work, and relax. New homes and jobs will accommodate growth and future demands through industrial intensification and co-location with new residential uses. Redevelopment will be complemented by public spaces and pocket parks, enhanced and high quality public realm. A robust local movement network of walking and cycling routes and social infrastructure will connect surrounding neighbourhoods and communities. Neasden Stations Growth Area (NSGA) will also serve as an important gateway to the wider area, with improved connectivity via the existing Neasden station and proposed West London Orbital (WLO) station. Regeneration will transform what is today an area comprised of underutilised and unloved spaces, into a new mixed-use neighbourhood, with a distinct and characterful sense of place for new and existing communities alike.

2.2 OUR OBJECTIVES

2.2.1. To deliver the vision of what NSGA could be in the future, a number of key objectives have been defined and are underpinned by the planning policy context set out in **Section 3**.

This Masterplan SPD aims to help:

- Realise the ambitions for regeneration and growth set out in the draft Brent Local Plan and London Plan;
- Encourage more efficient land use through industrial intensification and residential co-location to increase industrial capacity and meet housing demand;
- Attract long-term investment into the growth area and provide certainty to investors;
- Create an exemplary and characterful place underpinned by robust development, placemaking and sustainability principles;
- Maximise the benefits of the proposed WLO line and support closer working between TfL, the WLA and other stakeholders to unlock the potential of key development sites;
- Promote active and sustainable travel modes and encourage the development of new infrastructure and the extension or enhancement of existing infrastructure;
- Enhance the public realm and create healthy streets for people to improve the quality of the local environment;
- Create a new network of green infrastructure and provide much-needed public open space accessible to existing and new communities alike;
- Overcome issues of severance between the growth area and its surroundings and establish links to adjacent development sites and town centres; and
- Support climate change resilience and encourage the adoption of zero carbon and circular economy principles.

2.3 OUR VALUES

2.3.1. Our values underpin this Masterplan SPD and set out the type of place the Council wants Neasden to be in the future and the qualities we want it to possess. These values are informed by a series of placemaking principles to help shape and serve as a critical framework for emergent design proposals. When used in the context of regeneration, the term ‘placemaking’ can imply that a place needs to be made. However, places almost always already exist. Whilst Neasden is no exception to this, it does need cultivating to ensure it can both meet the challenges and seize the opportunities that the future holds.

2.3.2. At present, the growth area is an in-between space fragmented by infrastructure and lacking a definitive character or sense of place. Development consistent with the content of this Masterplan SPD represents a significant opportunity to make a new place at the heart of Neasden, which acts as a gateway to and provides connections between the growth area and its surroundings. Our values are intended to help guide design teams in developing design proposals for sites within the growth area through a place-based approach, and serve as a framework for the Council to periodically review those design proposals against at key milestones. We want Neasden to be:

A resilient place that:

- Minimises the use of resources and creation of pollution;
- Maximises the use of renewable resources;
- Supports the principles of a circular economy,
- Reduces flood risk and employs effective water run-off control measures; and
- Reduces water consumption and its associated energy requirements.

A characterful place that:

- Has a distinctive identity;
- Relates to and strengthens the existing community and neighbourhood;
- Supports communality and fosters a sense of belonging;
- Creates inclusive spaces for people that support interaction and cohesion;
- Supports local town centres and social infrastructure; and
- Celebrates local landmarks and heritage.

A connected place that:

- Improves accessibility to public transport infrastructure;
- Creates permeable and walkable neighbourhoods;
- Supports modal shift by prioritising active travel and public transport for local journeys;
- Improves air quality and the local environment;
- Supports the principles of Vision Zero and Healthy Streets; and
- Minimises the impact of freight and servicing on vulnerable road users.

A green place that:

- Creates a hierarchy of safe, secure and welcoming local public spaces;
- Incorporates green infrastructure to support biodiversity, ecology, recreation, food production, microclimate control, adaption to climate change and flood protection;
- Establishes coherent relationships between buildings and public spaces;
- Supports the creation of an interconnected network of green infrastructure both within and beyond the growth area; and
- Provides robust maintenance and management plans for all planting for a minimum of five years, from the end of construction to the end of the establishment period;

A diverse place that:

- Encourages use and enjoyment by all people irrespective of protected characteristics;
- Represents the needs of children and young people;
- Provides high quality play space to support young people of all ages;
- Celebrates ethnic and cultural diversity, and is founded on inclusive participation; and
- Supports different modes of living and domestic cultures.

A robust place that:

- Employs a well-detailed, durable and economical material palette;
- Ensures that the material palette is functional and fit for purpose;
- Creates moments of delight that instil a sense of civic pride;
- Prioritises ease of maintenance to retain the value of the development over time;
- Incorporates building technologies that are designed for change and can be easily adapted or replaced to meet future needs and standards; and
- Takes a proactive approach to designing out crime to ensure that buildings and spaces are resilient, but welcoming.

A Resilient Place

2.3.3. A resilient Neasden will conserve natural resources and respond to the impacts of the ongoing climate and ecological emergency. Well-designed buildings and landscapes will create a sustainable built and natural environment through a combination of mitigation, by reducing greenhouse gas emissions and minimising embodied energy, and adaptation to anticipated events such as rising temperatures and the increasing risk of flooding.

2.3.4. Development at Neasden will be lean, clean and green, and follow the energy hierarchy to achieve net zero-carbon by using less energy, supplying energy efficiently, using renewable energy and offsetting any shortfall in carbon dioxide reductions. The orientation of buildings will support less energy use, with contributions from natural resources such as sun, ground and wind optimised, and passive systems for light, temperature, ventilation and heat incorporated.

2.3.5. Neasden will support efficient energy supply, with decentralised and low carbon sources utilised alongside intuitive building technologies that are straightforward for people to use. Community-led initiatives will also be facilitated to give people ownership over their energy use and freedom to choose their energy provider. Neasden will also support renewable energy use, by maximising on-site generation, and utilising systems such as photovoltaic arrays, ground source heat pumps and district heating networks.

2.3.6. Effective water management at Neasden will be contingent on efficient use of water and resilient drainage to maintain healthy and sustainable water systems. As such, development will reduce water consumption and the associated energy requirements, whilst maximising opportunities for rainwater and greywater harvesting where there is both space to do so and a suitable use for harvested water.

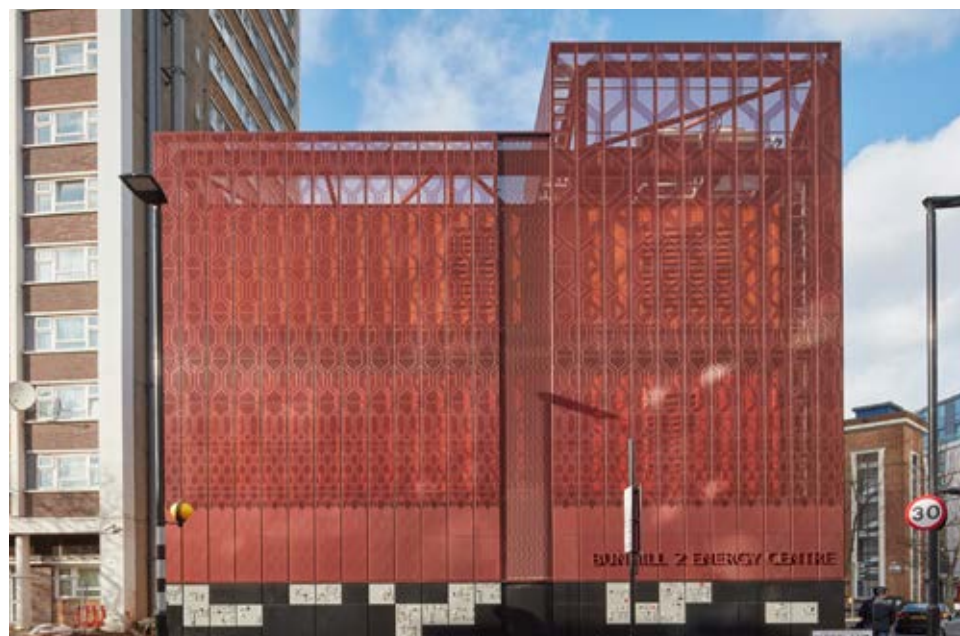
2.3.7. Development at Neasden will also utilise sustainable urban drainage systems (SUDS) to reduce flood risk and employ effective surface water run-off control measures. Green and brown roofs, ponds, swales, rain gardens and permeable surfaces will all add amenity value to landscapes and open spaces.



Sustainable roof garden and allotments involving community participation



Provisions for SUDs, raingardens and swales



District energy centre providing for energy needs



Support renewable energy use: photovoltaic arrays to harness solar energy

A Characterful Place

2.3.8. A characterful Neasden will be a place that people remember, feel connected to and ultimately value. Well-designed buildings and landscapes will be site-specific and have a meaningful relationship to the surrounding context, capturing the essence of the existing place and reinterpreting that to establish something new. Positive qualities of the area will be enhanced, whilst negative qualities will be improved.

2.3.9. Neasden will honour its heritage as a London suburb, which was driven by the arrival of the Metropolitan Railway, with the importance of public transport infrastructure reflected in the design of buildings and landscapes. Together, the renowned design legacy of both the Metro-land era and the London Underground will be a key part of Neasden's identity, informing the materiality, colour and texture of the place.

2.3.10. Neasden will also honour its heritage as a place of industry, which grew out of its origins as a place of agriculture and farming. Street and building names will reference both the factories that once dominated Neasden Lane, and the numerous goods historically manufactured in the area, such as pencils, perfume and paper.

2.3.11. Neasden will celebrate its vibrant cultural legacy and reference its noted contributions to fashion, sport, music, film and television. Notable residents will be honoured in direct and indirect ways, reinforcing a sense of place. As the home of the largest Hindu temple in Europe, Neasden will also be regarded as the spiritual heart of Brent, reflecting religious tolerance and racial diversity in the area, and across the borough.

2.3.12. Development at Neasden will strike a careful balance between retaining its existing character and identity and defining something new. Differences between the scale and density of new development and the existing place will be considered from the outset, with sensitive thresholds carefully managed to ensure that the different parts of the area are understood as one unified whole.



Neasden Depot and power station powered the entire network until 1960s



Neasden Temple



Twiggy' the first super model and fashion icon from Neasden



Bob Marley's first studio on Neasden Lane

A Connected Place

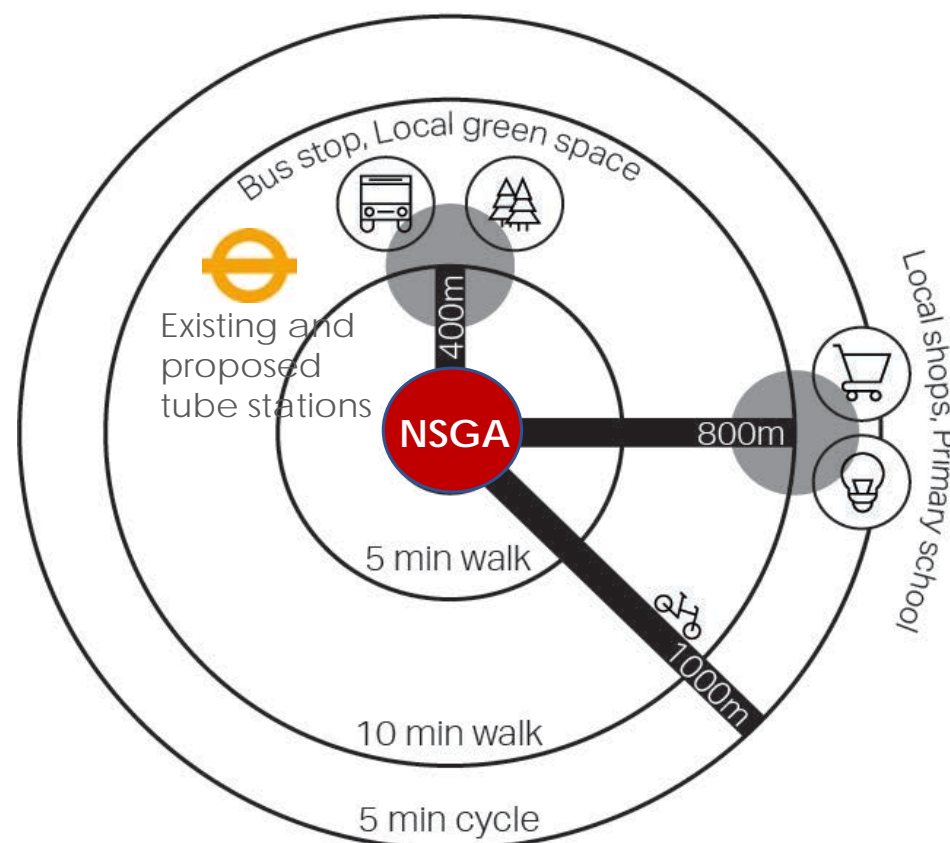
2.3.13. A connected Neasden will be accessible and easy to move around. Well-designed streets will play an important role in the local movement network, significantly enhancing connectivity and interaction within the neighbourhood, improving people's quality of life and supporting the creation of a sustainable, inclusive and mixed community.

2.3.14. Neasden will reflect the need for good quality streets, which has become increasingly important throughout the Covid-19 pandemic, and capitalise on shifting attitudes towards walking and cycling. Within the broader hierarchy of streets and routes defined across Neasden, quieter streets will be low-traffic and safer for pedestrians and cyclists, supporting good health and well-being and effecting lasting behaviour change.

2.3.15. As a 15-minute neighbourhood, Neasden will support a green recovery from the Covid-19 pandemic by creating more local ways of living, working and socialising. Increased working from home will be complemented by improved local connectivity. Residents will be able to access a range of services and amenities within an easy walk of their homes, benefitting from safe and accessible connections to the local town centres and open spaces.

2.3.16. As part of a polycentric city, Neasden will also take full advantage of its strategic location and good access to public transport by reducing severance and improving connectivity across Brent and the wider area. Residents will have the choice to enjoy London at all scales, from mews to metropolis, supporting social mobility and balanced economic vitality across the city.

2.3.17. Development at Neasden will deliver intensified industrial uses alongside high-density residential uses, and will not shy away from its dependence on the strategic road network. Interaction between increased volumes of freight and service vehicles and a greater number of pedestrians and cyclists will be carefully managed to prioritise the safety of vulnerable road users.



'15 minute neighbourhood'- Promoting active travel, modal shift and walking/cycling to local destinations



Segregation of cars/vehicles from pedestrian/cycle routes with landscape buffer facilitating safer and healthier streets



Provisions for cycling infrastructure



Movement network should prioritise walking and cycling. Provision for signage and use of material palette for shared surfaces can aid in wayfinding and navigation.

A Green Place

2.3.18. A green Neasden will be a place that successfully integrates the natural and built environments. Natural and semi-natural landscapes, open spaces, trees, grass, planting and water will contribute towards the quality of the place and people's quality of life. Nature will be prioritised in this urban area to improve public health, allow diverse ecosystems to flourish, and support biodiversity and climate change mitigation.

2.3.19. Development at Neasden will increase the quantity and overall quality of open space provision in the area, defining a hierarchy of local spaces that provide opportunities for comfort, relaxation, stimulation and social interaction in a safe environment. Open spaces will be carefully located and laid out, supporting a range of different activities through versatility and accessibility for all groups of people.

2.3.20. Neasden will incorporate site-specific green infrastructure that delivers benefits for both the community, and the natural environment. That green infrastructure will support biodiversity, ecology, recreation, food production, microclimate control, adaption to climate change and flood protection. Wildlife corridors and SINC along the railway lines will be utilised to extend and enhance this, establishing a wider network of green infrastructure that connects the growth area to Neasden Lane Park, Church End Park, Gladstone Park, Willesden Cemetery and Roundwood Park.

2.3.21. Landscape at Neasden will be high quality, robust and adaptable over time so they remain fit for purpose with continual use. Landscape and planting schemes will be considered from the outset and coordinated with utilities, highways and construction works. Chances of plant establishment and survival will be maximised through the specification of suitable plant species, provision of sufficient soil volumes, tree pits with aeration and root barriers, suitable edge treatments and irrigation.

2.3.22. Neasden will sustain the long-term amenity and environmental value of its landscapes and open spaces through the implementation of robust maintenance and management strategies that are based on an understanding of the costs for residents. These strategies will demonstrate an approach to planting for a minimum of five years, from the end of construction to the end of the establishment period.



Large inclusive public open space accomodating a range of activities for all



Outdoor gyms and activities for local communities



Accessible public open spaces and pocket parks



Provisions for parklets as places of interaction

A Diverse Place

2.3.23. A diverse Neasden will be a place that is used and enjoyed by all people, irrespective of gender, age, ethnicity, physical ability, sexual orientation or social background. The natural and built environment will be fairer and more inclusive, reflecting best practice through design to ensure the area is welcoming, responsive, intuitive, flexible, varied and convenient.

2.3.24. With around 25% of the local population aged under 18, Neasden will represent the needs of children and young people, and reflect London's status as an increasingly youthful city. Children and young people will be able to access social and physical infrastructure and move around the area safely, independently, and without adult supervision, benefitting their physical, social and mental development and health.

2.3.25. Development at Neasden will be child-friendly, maximising opportunities for safe play and outdoor activities. Open spaces will support formal and informal play, exercise and rest, and be accessible to all with no segregation. Open spaces will be well-overlooked by homes and other active uses to ensure they are welcoming and benefit from natural surveillance, overcoming crime and the fear of crime.

2.3.26. With around 55% of the local population identifying as belonging to Black, Asian or minority ethnic groups, Neasden will represent both the needs and cultures of all people. Protected groups will be considered from the outset and given a greater participatory role in shaping how the area evolves through meaningful stakeholder engagement.

2.3.27. Development at Neasden will support different modes of living, catering for multi-generational households, young families, and over 60s, alongside a range of different domestic cultures. Buildings and landscapes will be as much for local people as for new residents, allowing the establishment of a mixed and balanced community that reflects the diversity of the area.



A place for all including children and young people- Child friendly street, Milan



Promote active travel for all ages and groups irrespective of their background



NSGA promotes an inclusive community for all ages and groups



'Rise' - An event that celebrates Brent's diverse cultural heritage

A Robust Place

2.3.28. A robust Neasden will be a place that is beautiful and constructed in a high quality and long-lasting way. The scale, form and massing of buildings will influence what materials are appropriate for their construction. Residential buildings, in particular, will utilise modern methods of construction (MMC) where possible, including mass production for modular construction, off-site bespoke construction, and pre-fabrication.

2.3.29. The materiality of buildings and landscapes at Neasden will strike a careful balance between robustness, functionality and appearance, with none of these factors addressed at the expense of the others. Materials will be durable, fit for purpose and attractive, but they will also be well-detailed.

2.3.30. Development at Neasden will carefully consider the junctions and connections between materials, ensuring that they are not undermined by poor quality design or workmanship. Functional details of buildings, such as lighting, flues, ventilation grilles and louvres, gutters and rainwater pipes will be considered from the outset to ensure they are not an afterthought.

2.3.31. The high quality built and natural environment at Neasden will be underpinned by a strong sense of stewardship, with buildings and landscapes valued as long-term assets by landowners and developers. Whole life cycle costing will be considered from the outset, ensuring that materials are both economical and long-lasting. Ease of maintenance will be prioritised in the decision-making process to strike an appropriate balance between short-term and long-term investment.

2.3.32. Development at Neasden will prioritise ease of maintenance, but buildings and landscapes will not be designed for the worst-case scenario. Visible hostility to crime and vandalism, can often provoke rather than prevent misuse. Buildings and landscapes will be equally resilient and welcoming, retaining their value over time and keeping people safe from crime or the fear of crime.



Use of complementary and robust material palette



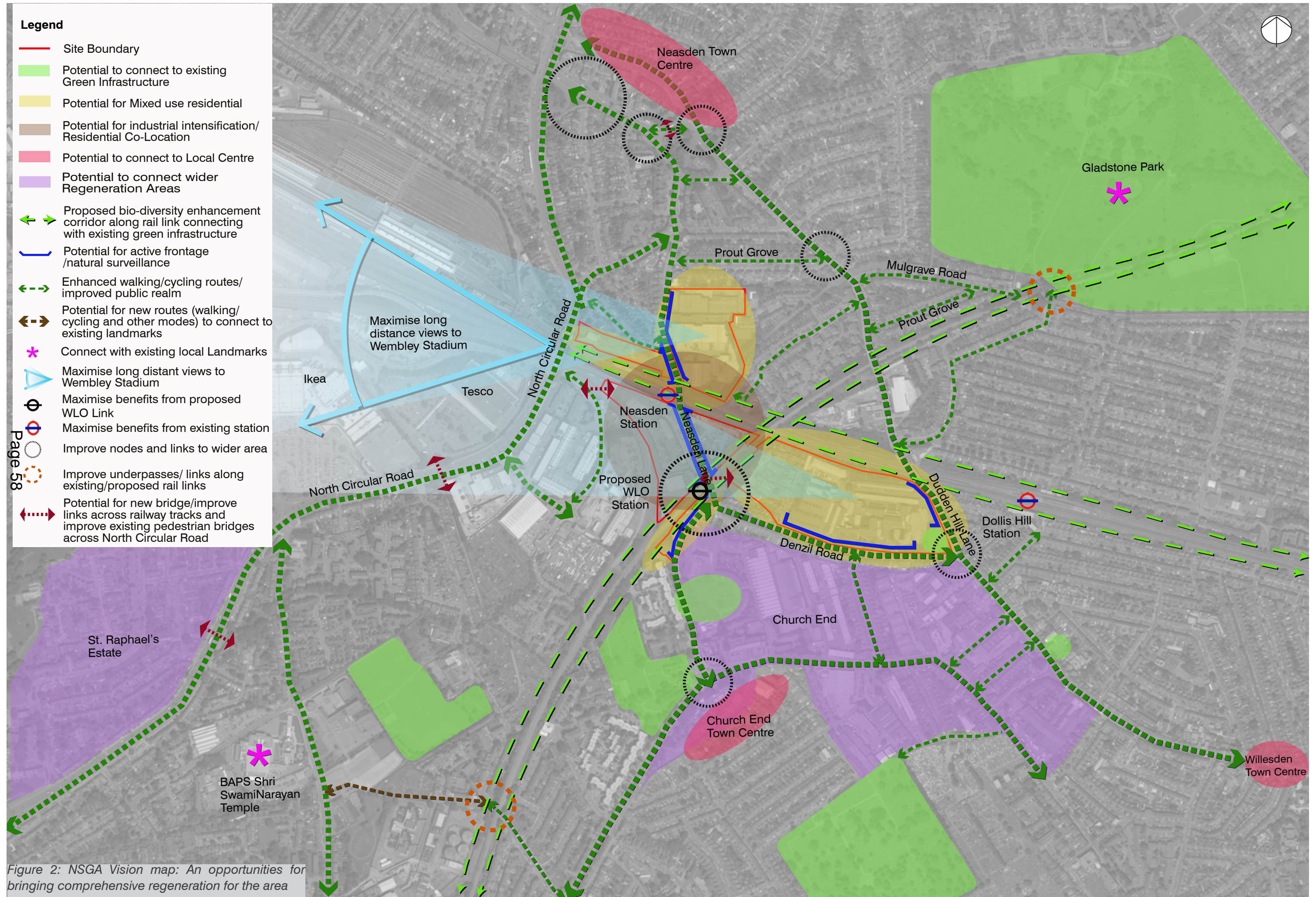
Accessible design and creating places of interaction



Accommodate a variety of uses and activities



Bespoke design and material palette for industrial uses that complement other functions.



2.4 OPPORTUNITIES

Regeneration and Growth

2.4.1. NSGA represents a significant opportunity to deliver more efficient and intensive land use. This is proposed through the co-location of industrial, residential, and other uses. Co-location was historically predominant in cities up to the early twentieth century, but has been much less common since, with planners and developers tending to zone uses into different areas. Population growth means there is a need to use land more intensively. Co-location is an emerging trend seen as one potential solution to the housing crisis, whilst at the same time meeting the demand for industrial space in cities. It must, however, address a distinct series of design, planning and financial viability challenges to be deliverable.

2.4.2. Co-location can be delivered horizontally (by splitting a site into industrial and residential areas) or vertically (by stacking residential uses on top of industrial uses), with the vertical configuration having the advantage of ensuring no net loss of industrial floorspace and ensuring an efficient use of land. Closer co-location of industrial and residential uses is a relatively new approach to planning development in London, and there are very few co-location schemes with planning permission at this stage. This Masterplan SPD does however demonstrate that NSGA can accommodate a vibrant new mixed-use neighbourhood with the capacity to deliver at least 2,000 much-needed new homes, intensified industrial uses to support business growth and jobs, together with new and improved social infrastructure and green open spaces. See **Section 9** for case studies of exemplar co-location schemes.

2.4.3. Neasden, like many parts of Outer London, has long benefitted from the radial public transport routes that fan out across the capital. New infrastructure is however needed to support local regeneration and growth, unlocking the delivery of new homes and jobs. In recent years, there has been significant investment in improving orbital public transport routes. These have better connected parts of Outer London and eased movement across the city. Opened in 2007, the London Overground network has progressively helped catalyse regeneration. It has reconnected several growth and less affluent areas, and allows travel around the city, rather than in and out of the centre. An extension of this network through the WLO line would, if delivered, create a strategically important arc linking together the Cricklewood/Brent Cross, Wembley, Old Oak & Park Royal and Heathrow Opportunity Areas. It is also expected to cut journey times around West London, when compared to equivalent journeys by car. Consequently, it will play a key role in reducing both car dependency and traffic congestion in Outer London.

Figure 2 illustrates the masterplan vision map for NSGA showcasing some of the key opportunities, such as junction improvements, movement network enhancements, proposed walking and cycling routes and improved linkages for the comprehensive physical and socio-economic regeneration of the growth area and its surroundings.

2.4.4. Opportunities at Neasden Stations Growth Area would be maximised with delivery of the WLO line. Part of the planned route uses the Dudding Hill line, which runs through the growth area to the south of the existing Neasden station. A planned new station where the line crosses over Neasden Lane will greatly enhance public transport accessibility in the area. It will also help define Neasden as a key interchange between radial and orbital routes.

Reconfiguring Land Uses

2.4.5. Development at NSGA will rely on a greater intensity of land use to ensure that new homes and supporting infrastructure can be delivered alongside increased industrial capacity. At present, the northern and western parts of the growth area are composed of large sites containing either industrial warehouses, commercial buildings, waste or open storage uses. To the east, the CNWL site is the largest site in the growth area and contains underutilised educational buildings. Between these areas, a pocket of two storey suburban terraced and semi-detached housing is situated, reflecting the character of much of Neasden beyond the growth area boundary. Regeneration provides a significant opportunity to increase density here to make more efficient use of currently underutilised land.

2.4.6. Co-location does present challenges and land use conflicts in and around the growth area will need to be carefully managed. Development at NSGA will need to support co-located uses and allow neither one to prejudice any other. Densification will also need to find the right balance between intensified land use and the established character of the wider area. Realistically, the majority of the two storey suburban streets in Neasden and its surroundings will remain. As such, the growth area will need to be carefully stitched into the urban fabric, with particular attention paid to its edges and boundaries. There are unique opportunities for new types of housing to be developed here. This could include those that support densification whilst respecting the suburban character of the area or those that support an emerging future where living and working are increasingly blended.

2.4.7. In reconfiguring land uses, there is an opportunity to help integrate the isolated pockets of existing suburban housing in and around the growth area into a newly defined residential neighbourhood. By consolidating industrial uses and introducing residential uses across the growth area, development has the potential to create a new sense of place that will reinforce the existing community and sustain it as it evolves over time. Delivery of the WLO line will establish a key public transport interchange at Neasden that will underpin this new sense of place by supporting the definition of a neighbourhood centre along Neasden Lane, between the existing and planned stations, and creating a focal point for the community. Whilst principally serving the needs of residents within the growth area, a new neighbourhood centre, which incorporates a variety of uses, with enhanced public transport accessibility also has the capacity to complement the existing town centres of Neasden to the north and Church End to the south, and potentially increase footfall to these areas.

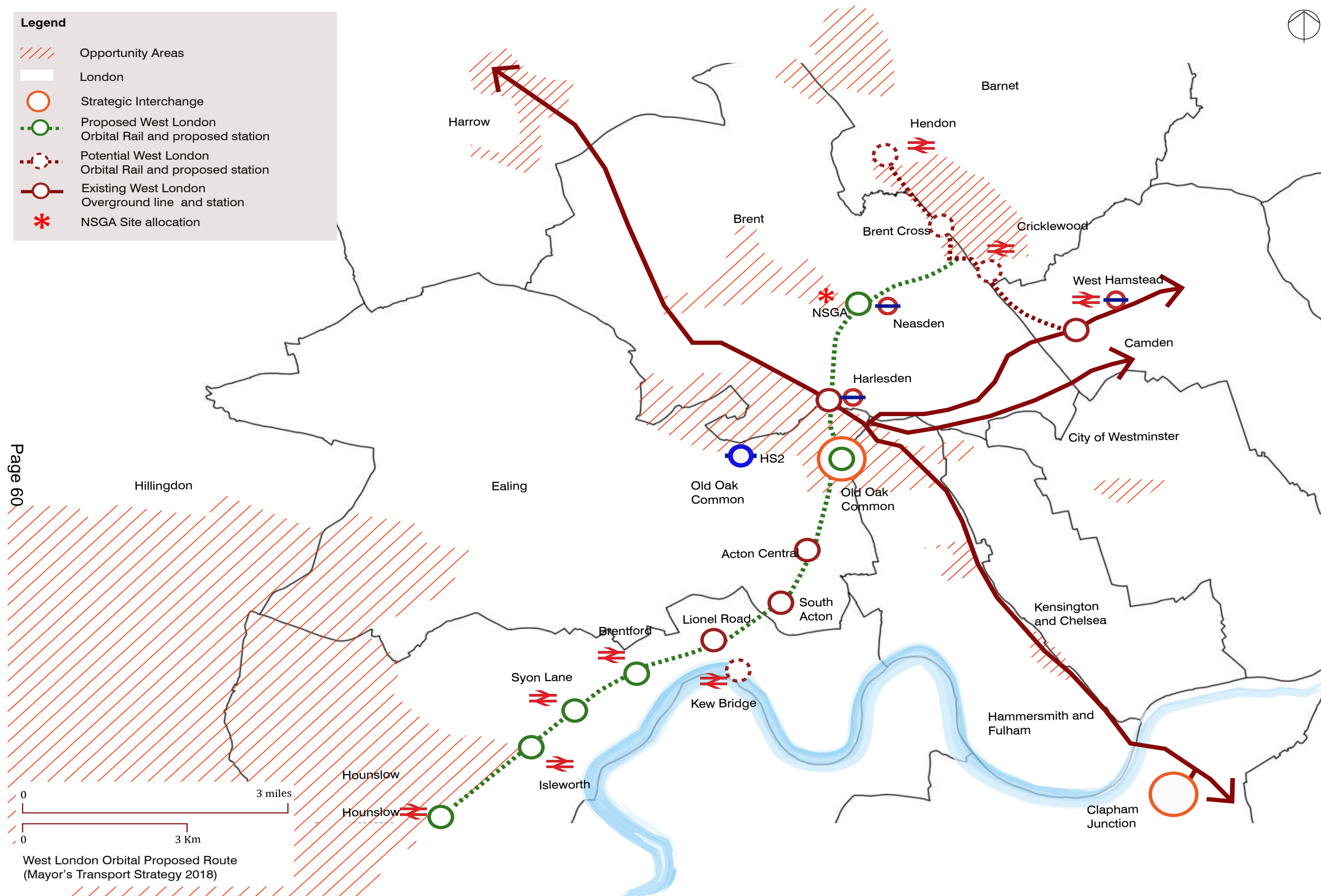


Figure 3: Proposed West London Orbital(WLO) route

Improve Connectivity

2.4.8. Brent suffers from a range of connectivity issues caused by varying degrees of severance across the borough. This severance typically occurs where the residential street pattern conflicts with major infrastructure, such as roads, railways, waterways or industrial areas. Consequently, it creates barriers within the movement network. The North Circular Road bisects the borough and represents the most significant of these barriers. A small number of junctions allow traffic to cross from one part of the borough to the other, but these are frequently busy and present challenges to any pedestrians and cyclists that attempt to navigate them. The development of Brent has historically been car-led, with the resultant high levels of car usage seen today causing the main movement corridors in the borough to become hostile environments for active travel.

2.4.9. Regeneration and growth will alter the demographics of Brent. A new generation of students and young professionals, who are less likely to own cars, should gradually increase the demand for active travel. It is possible that the Covid-19 pandemic will further accelerate this demand as people continue working from home and opt to walk or cycle, rather than use public transport. It is too early to say whether the pandemic will effect lasting behaviour change. Its immediate impact however does represent a significant opportunity to press forward with the planning and delivery of walking and cycling infrastructure. This will help meet the modal shift aspirations of the MTS and, most importantly, support life post-pandemic.

2.4.10. Neasden's proximity to the North Circular Road has helped sustain its industrial and commercial uses by providing good connections to the strategic road network. However, it's associated high volumes of traffic and congestion creates a sense of isolation and restricts permeability between the area and its surroundings. Two dedicated pedestrian and cyclist crossings are located within a 15 minute walk of Neasden station, provided via an underpass and footbridge respectively. These crossings connect Neasden and Church End to Wembley and beyond. Both require improvements to ensure that they are safe and accessible for all. Both are also indirectly connected to NSGA, with pedestrians and cyclists having to navigate hostile environments in order to access them. As such, there is a need to better integrate these crossings into the movement framework by improving the routes to them from within the growth area.

2.4.11. Development at NSGA has the capacity to unlock the delivery of much-needed active travel improvements to Neasden Lane and the Neasden roundabout, as well as a new pedestrian and cycle crossing over the railway to Great Central Way. A new crossing would improve connectivity between the designated growth areas at Neasden, Church End and Wembley, whilst creating a new connection between Neasden station and the St Raphael's Estate. Built between the 1960s and 1980s, the St Raphael's Estate is cut off from its surroundings by infrastructure, and has consequently suffered from socio-economic issues and deprivation. In response, the Council has set out its ambition to improve the quality of life on the estate in the draft Brent Local Plan. Enhanced connectivity to Neasden will support that ambition, allowing the estate to benefit from the opportunities of the growth area and helping it to become a more integrated and sustainable community. **Figure 3** shows the proposed route of the West London Orbital link and **figure 4** shows the strategic location of NSGA in the wider context of West London.

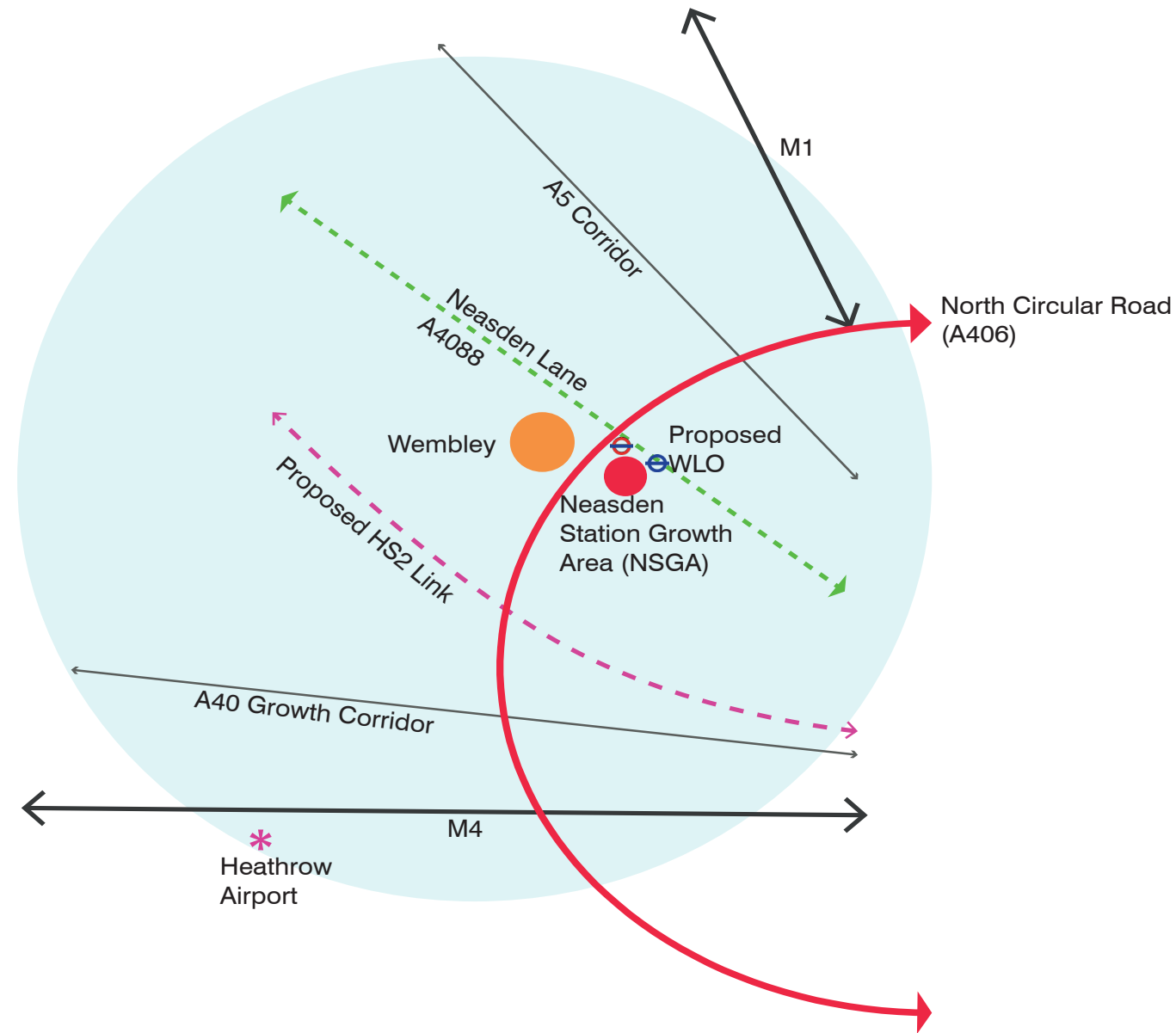


Figure 4: Strategic location Neasden Stations Growth Area



3. PLANNING POLICY



Figure 5: NSGA Policy Framework



Figure 6: Priority Growth Areas- Neasden Stations Growth Area Site allocation

3.1 PLANNING POLICY OVERVIEW

3.1.1. Planning policy relevant to the regeneration of NSGA is contained in a hierarchy of policy and guidance from national to local level as indicated in **Figure 5 (Planning Policy Framework)**. **Figure 6** shows the priority growth areas and town centres that have been identified within the draft Brent Local Plan.

National and Regional Policies and Guidance

3.1.2. The National Planning Policy Framework (NPPF), National Planning Policy Guidance (NPPG) and the London Plan (2021) are material considerations in determining planning applications. This Masterplan SPD sets out several planning principles to underpin the economic, social and environmental role of development in accordance with this national and regional policy.

Development Plan Policies

3.1.4. The draft Brent Local Plan designates the land around Neasden station as a growth area. The designation recognises the key role the area will play in meeting housing and employment needs for the borough. One adopted, this Masterplan SPD will form part of the Brent Local Plan and will be a material consideration when assessing planning applications that come forward in the area identified in red on **Figure 5**.

3.1.4. The relevant draft Brent Local Plan policies which this SPD provides further guidance on are summarised below:

3.1.5. Site Allocation BEGA1A: Neasden Stations Growth Area

BP2 East Place and site allocation BEGA1A within the draft Brent Local Plan recognise NSGA as a priority area for regeneration and set out the context and policy framework for development here. The vision for the East Place, and NSGA specifically, is to provide new housing and industrial uses in a higher density development. This will incorporate tall buildings (see **Tall Building Strategy 2021**) with enhanced public realm, provision of green and supporting infrastructure, and improved public transport accessibility through the proposed WLO line and upgrades to the existing Neasden station.

3.1.6 Draft Brent Local Plan Policy BE2: LSIS and intensification through co-location:

NSGA incorporates predominantly industrial land and includes Locally Significant Industrial Sites (LSIS). Policy BE2 sets out the Council's approach to co-location and intensification based on an industrial land analysis in the Brent Industrial Land Audit (2019). In certain locations Policy BE2 supports a plan-led and masterplanning approach to identifying and maximising the development potential of industrial land through co-location. It recommends retaining existing industrial floorspace amounts or where these are low, increasing the amount of industrial floorspace through intensification. These policies align and conform to London Plan Policies E4 and E7, and are supported by the GLA's Industrial Intensification and Co-location Study 2018 and Industrial Intensification Practice Note 2018.

Industrial Land Designations

3.1.7. The London Plan identifies three levels of industrial land designation; Strategic Industrial Land (SIL) as outlined in Policy E5, Locally Significant Industrial Sites (LSIS) as outlined in Policy E6, and Non-designated Industrial Land as outlined in Part C of Policy E7.

3.1.8. The Brent Industrial Land Audit (2019) identifies the industrial land at NSGA as Neasden Lane: LSIS. The draft Brent Local Plan Policy BE2 takes this strategic designation forward and affirms its development potential to support intensification and co-location. Policy BE2 requires a net increase in industrial floorspace resulting in a minimum 0.65 plot ratio or the existing floorspace total, whichever is greater, across the growth area.

3.1.9. In accordance with London Plan Policies E4 and E6, the range of industrial and related uses acceptable on LSIS include:

- Light and general industry;
- Research and development;
- Storage and logistics/distribution; and
- Flexible hybrid space for small and medium-sized enterprises (SMEs).

3.1.10 London Plan Policy E7: Intensification, co-location and substitution:

Policy E7 supports the intensification of industrial uses within Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS) to make better use of land and to strengthen their role in supporting growth in London's economy and population. The policy promotes a plan-led and masterplanning approach to intensifying industrial capacity in SIL and LSIS to free up land to meet other planning objectives, such as housing and infrastructure delivery. As such, Policy E7 encourages more efficient and consolidated use of LSIS land and through the co-location of uses are considered appropriate. It clearly states that the function, access, servicing and days/hours of operation of industrial uses should not be compromised, and that design mitigation should ensure residential uses are well-designed and provide a suitable level of amenity for residents. It also states that acoustic and other environmental mitigation against noxious odours, dust and vibration should be considered.

3.1.11. The NPPF and London Plan emphasise the importance of allowing sufficient flexibility to adapt to changing circumstances by supporting the managed release of surplus industrial land, with the release of land around transport nodes promoted to enable higher density development. An unmanaged approach to the loss of industrial land would affect the availability of business accommodation, and impact on economic growth within the borough and wider London.

3.1.12. The draft Brent Local Plan safeguards SIL and LSIS for industrial uses. Policy sets criteria to determine where other uses in SIL, LSIS and non-designated Local Employment Sites (LES) will be acceptable.

Other Relevant Planning Policies and Guidance

3.1.13. Apart from the policies mentioned in this section, this Masterplan SPD should be read in conjunction with the following national, regional and local policy documents:

National Planning Policy Framework, London Plan (2021), Draft Brent Local Plan 2020, Brent Design Guide SPD1, Brent Tall Building Strategy 2021, GLA Industrial Intensification and Co-location Study 2018.



4. TODAY'S NEASDEN STATIONS GROWTH AREA



Figure 7: NSGA context

4.1 CONTEXT AND CHARACTER

4.1.1. Neasden Stations Growth Area (NSGA) comprises 11.5 hectares of land around Neasden station. The growth area is composed of nine sites including five Locally Significant Industrial Sites (LSIS), the Dephna House site on Neasden Lane, the College of North West London (CNWL) site on Denzil Road, the residential area of Selbie Avenue and Severn Way, and properties along the south east of Neasden Lane including the Neasden Service Station site. The LSIS incorporates mainly light industrial, storage, waste processing and open storage uses.

4.1.2. NSGA is primarily characterised by large, open sites populated by a small number of poor quality low-rise industrial warehouses and sheds. These sites are bounded by roads and railways, and sit alongside two storey semi-detached and terraced houses, the majority of which are either Victorian or Edwardian. By contrast, the Falcon Park Industrial Estate contains good quality warehouses and workshops, is well-occupied, and caters to a variety of light industrial needs including manufacturing and wholesalers. The CNWL site has been identified by the College as being available for redevelopment for other uses. The receipts generated from this will help deliver a new campus on an alternative site in Wembley Park. See **Section 6.5** for a more in-depth assessment of character across the growth area. **Figure 7** shows the context of NSGA.



College of North West London entrance along Denzil Road



Neasden Station



Neasden Lane industrial area



Council owned open space in front of CNWL



Two storeyed terraced properties along Denzil road



View across Severn Way to new development



Severance from rail links and view of Wembley Stadium beyond along Neasden Lane



Ten storey mixed used residential development in proximity to NSGA on Dudden Hill Lane

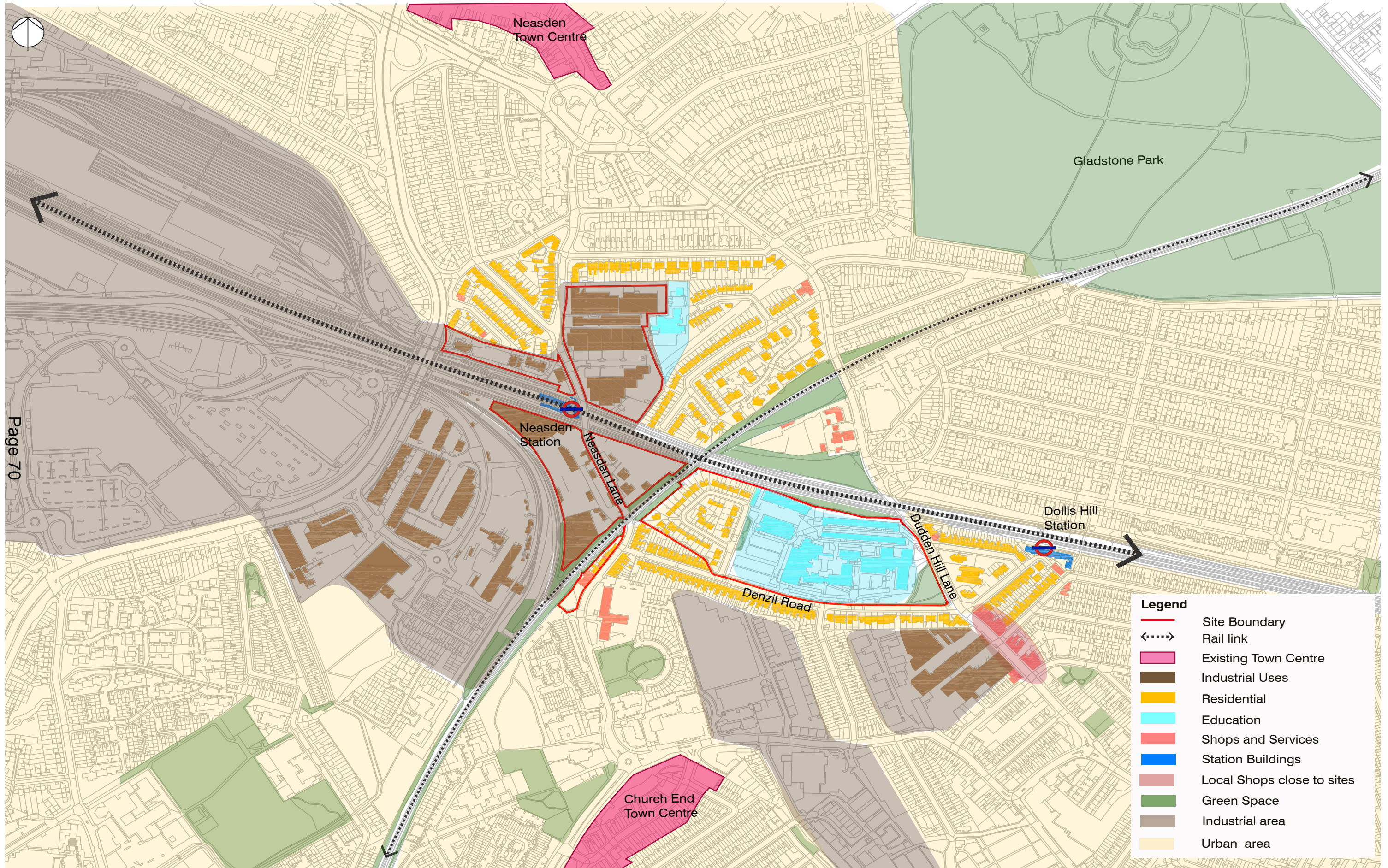


Figure 8: NSGA Land use

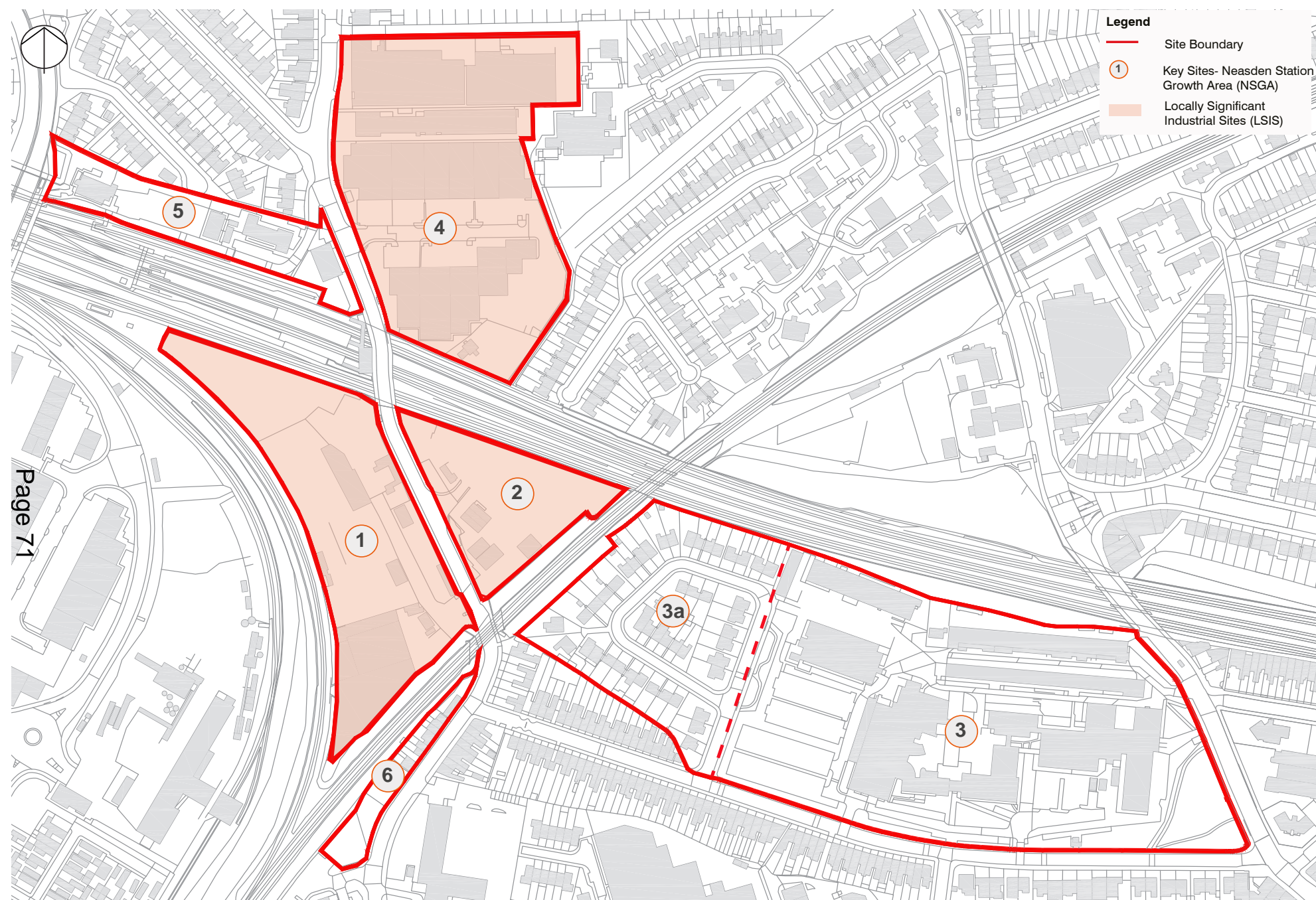


Figure 9: Local Plan (NSGA) site allocation

4.2 LAND USE

4.2.1. NSGA is composed of six sites as summarised below. **Figure 8** shows the land use and **Figure 9** gives the breakdown of these sites.

- **Site 1:** The McGovern Yard site, which comprises scrap metal handling and recycling functions, and includes some low-rise open storage and ancillary buildings;
- **Site 2:** The O' Hara site, which comprises open storage and ancillary buildings.
- **Site 3:** The CNWL site, which comprises the main college building alongside a number of ancillary buildings, is the largest site in the growth area. The site is currently underutilised and there have been discussions regarding the relocation of the campus to an alternative site. In addition to CNWL, Site 3 also includes two public open spaces owned by the Council; one on Selbie Avenue and another at the junction of Denzil Road and Dudden Hill Lane.
- **Site 3a:** The housing site is a residential area adjacent to Site 3. It comprises approximately 50 terraced houses, and is a former Council estate, with access via Selbie Avenue and Severn Way.
- **Site 4:** The Falcon Park Industrial Estate, which comprises warehouse and distribution functions and workshops. Prominent occupiers include manufacturers of electrical equipment for the entertainment industry, wholesalers related to the music industry, and Brent Ambulance Station.
- **Site 5:** The Dephna House site, which comprises residential units and some employment use and also includes part of the London Underground Neasden Depot premises.
- **Site 6:** The former Neasden Service Station site, which comprises car sales and some two storey terraced houses.

Area Schedule below:

No.	Sites	Areas (Ha)
1	McGovern Yard Site(LSIS)	1.75
2	O'Hara Site (LSIS)	0.74
3	CNWL Site (3 and 3a)	5.8
4	Falcon Industrial Estate Site (LSIS)	2.54
5	The Dephna House Site	0.68
6	Neasden Lane Service Station Site	0.21
Total		11.72

4.3 LOCAL AND NEIGHBOURHOOD CENTRE

4.3.1. There are two town centres within close proximity of NSGA; Church End a 'local' town centre to the south and Neasden 'district' town centre to the north. Both comprise mainly local convenience shops and services, restaurants and takeaways that cater to diverse community needs. Both suffer from high vacancy rates and lack both vitality and viability.



Natural and artwork- Neasden subway



Neasden town centre shopping parade



Neasden Subway at the corner of Neasden town centre leading to Neasden Lane



Historic features on the 1st floor of shops - Neasden town centre



Neasden town centre can benefit from improved connectivity to NSGA



Church End town centre shopping parade

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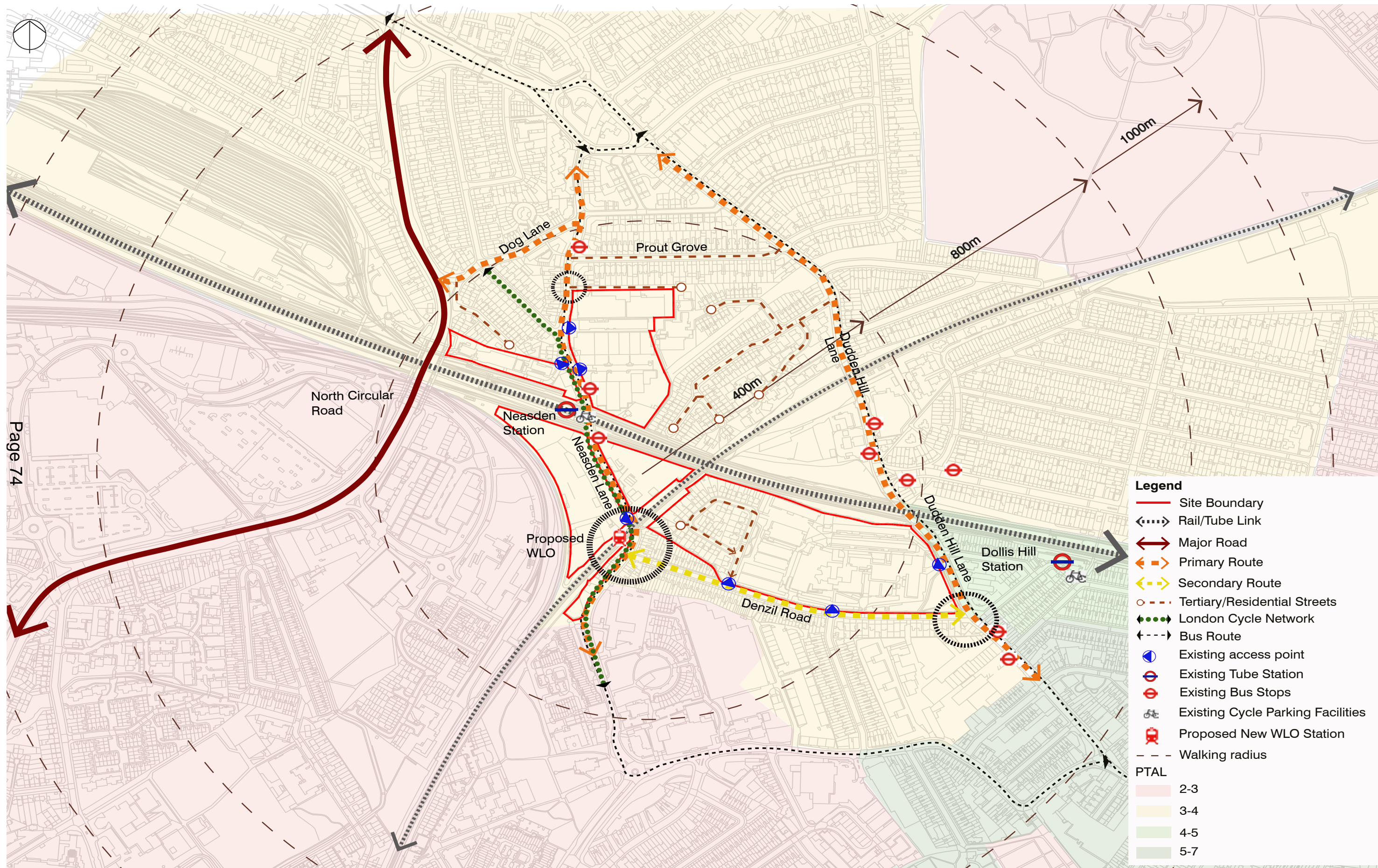


Figure 10: NSGA Movement Network

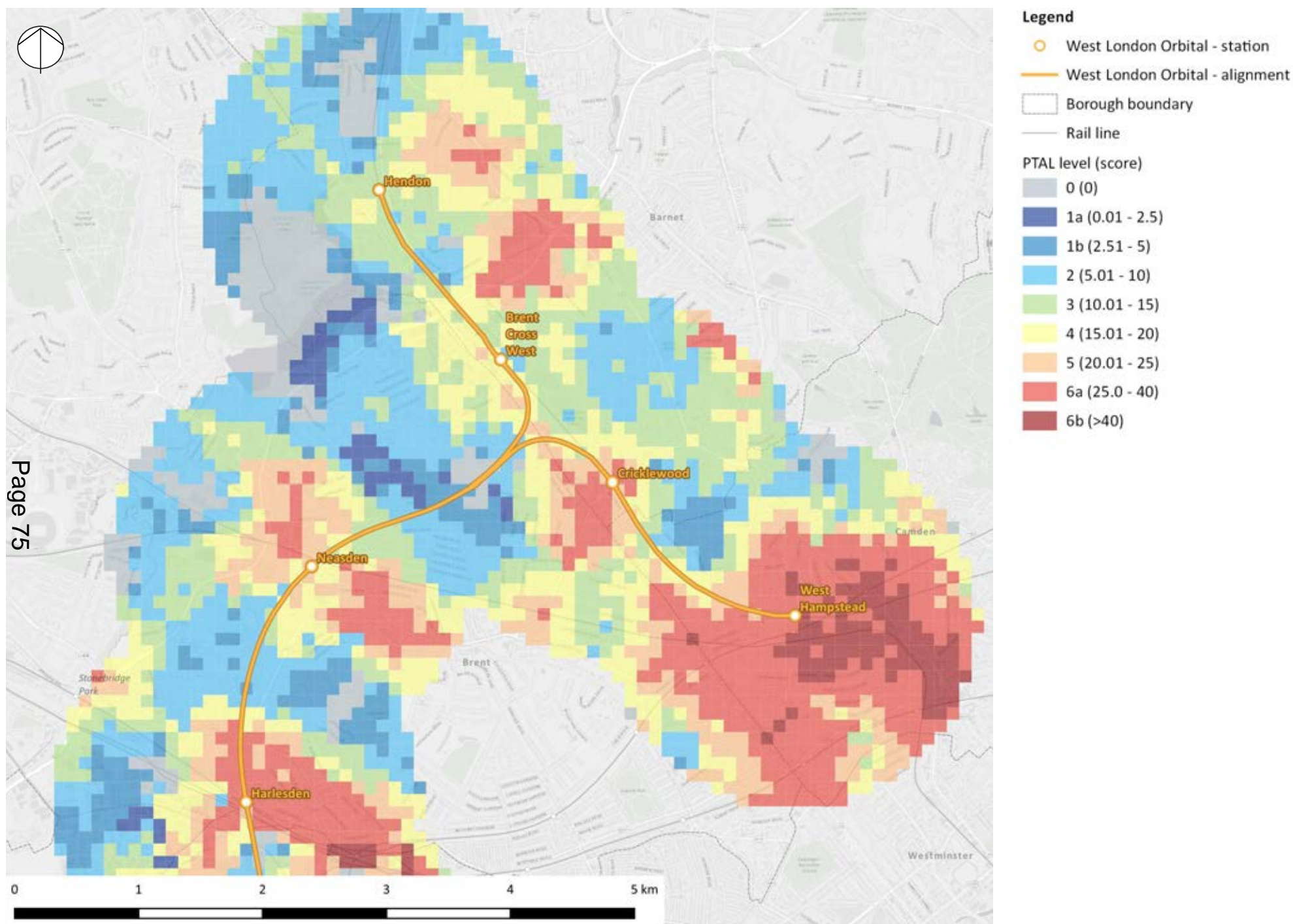


Figure 11: PTAL map

4.4 MOVEMENT AND ACCESSIBILITY

4.4.1. NSGA is strategically located. Access to the A406 North Circular Road is about 0.5 miles away via Neasden Lane (B453) and Dudden Hill Lane (A4088), which converge at Neasden town centre. NSGA further benefits from immediate proximity to Neasden station, which is served by the Jubilee line with regular services to the southeast into Central London and to the northwest to Wembley Park.

4.4.2. Neasden Lane and Dudden Hill Lane are heavily trafficked, single carriageway roads with a mix of vehicle types. Neasden Lane is a borough distributor road. It links Neasden and Church End via Neasden station. Dudden Hill Lane (A4088) also forms part of the borough's primary route network, connecting to Sudbury and Willesden.

4.4.3. Neasden Lane is served every 9-13 minutes between 6am and 11pm by bus route 297 to Willesden and Ealing Broadway. Dudden Hill Lane is served by bus routes 302 to Mill Hill/Kensal Rise (operating every 6-11 minutes) and N98, which operates every 30 minutes between Stanmore and Central London. The primary movement corridor for bus services is the A4088 Blackbird Hill/Neasden Lane and A406 North Circular Road, with connections off Dudden Hill Lane that link to the wider neighbourhood.

4.4.4. There are no dedicated walking or cycling routes in the area. Limited cycling infrastructure, such a lack of cycle lanes (segregated/non-segregated) and lack of on-street cycle parking facilities, alongside poor quality public realm make cycling more challenging for non-experienced riders in this part of the borough. This situation is further exacerbated by a lack of clear signage and heavily trafficked roads.

4.4.5. In Brent, cars are used for more journeys than any other mode of transport, with half of the car journeys being under 5km (typically less than 15 minutes by bicycle). This is despite the borough having the joint highest number of stations in London. Most of NSGA has a public transport accessibility level (PTAL) of 4-5. Whilst this is higher than most of the emerging growth areas in Brent, the Mayor's Transport Strategy (MTS) explores how future improvements to the London Overground network could further enhance public transport accessibility and support additional growth, particularly in West London.

4.4.6. A planned new station at Old Oak Common, served by both Crossrail and HS2, creates significant opportunities for connectivity to the wider area. As such, the MTS commits to work towards the delivery of the WLO line to connect Hounslow with Cricklewood and Hendon via Old Oak Common and another planned new station at Brent Cross West. **Figure 10** shows the movement network in the area. The WLO line will result in an increased PTAL of 5-6a and **Figure 11** shows the PTAL map for the growth area.

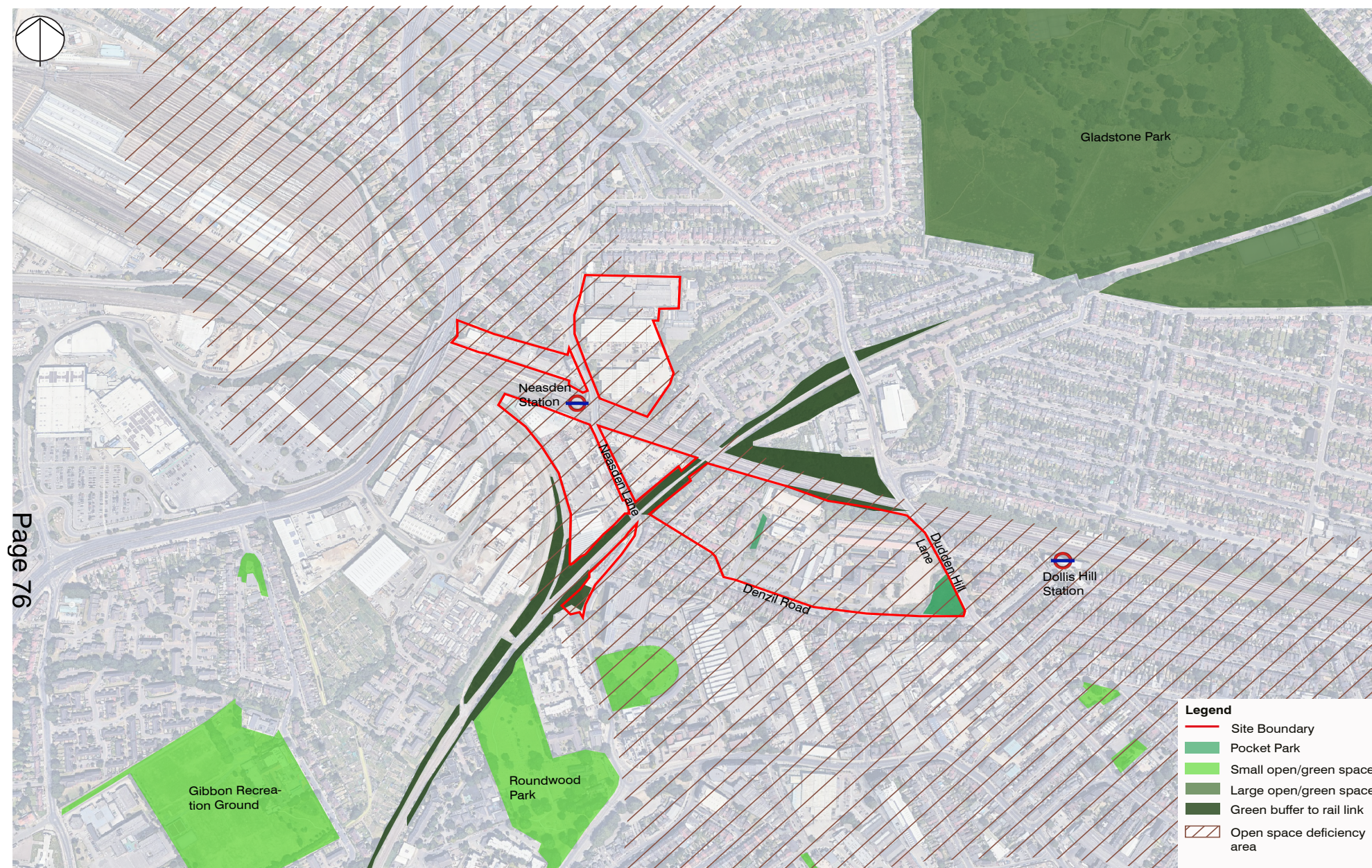


Figure 12: NSGA Open Space and Heritage

4.5 OPEN SPACE AND PUBLIC REALM

4.5.1. NSGA is located in an open space deficiency area. Open spaces that are either part of or within close proximity of NSGA are underutilised. This includes the council-owned Neasden Lane Park and the Denzil Road/ Dudden Hill Lane space. Both are sit within close proximity of main roads with few facilities and low landscape quality.

4.5.2. Local parks such as Gladstone Park and Roundwood Park are within 5-15 minutes walking and cycling distance. Gladstone Park is a local landmark in the area and offers views across London. It also contains sports pitches, tennis courts, an outdoor gym and children's playgrounds. The lack of clear walking and cycling routes to these spaces from NSGA diminishes their accessibility. Figure 12 shows the open spaces and parks in the area.

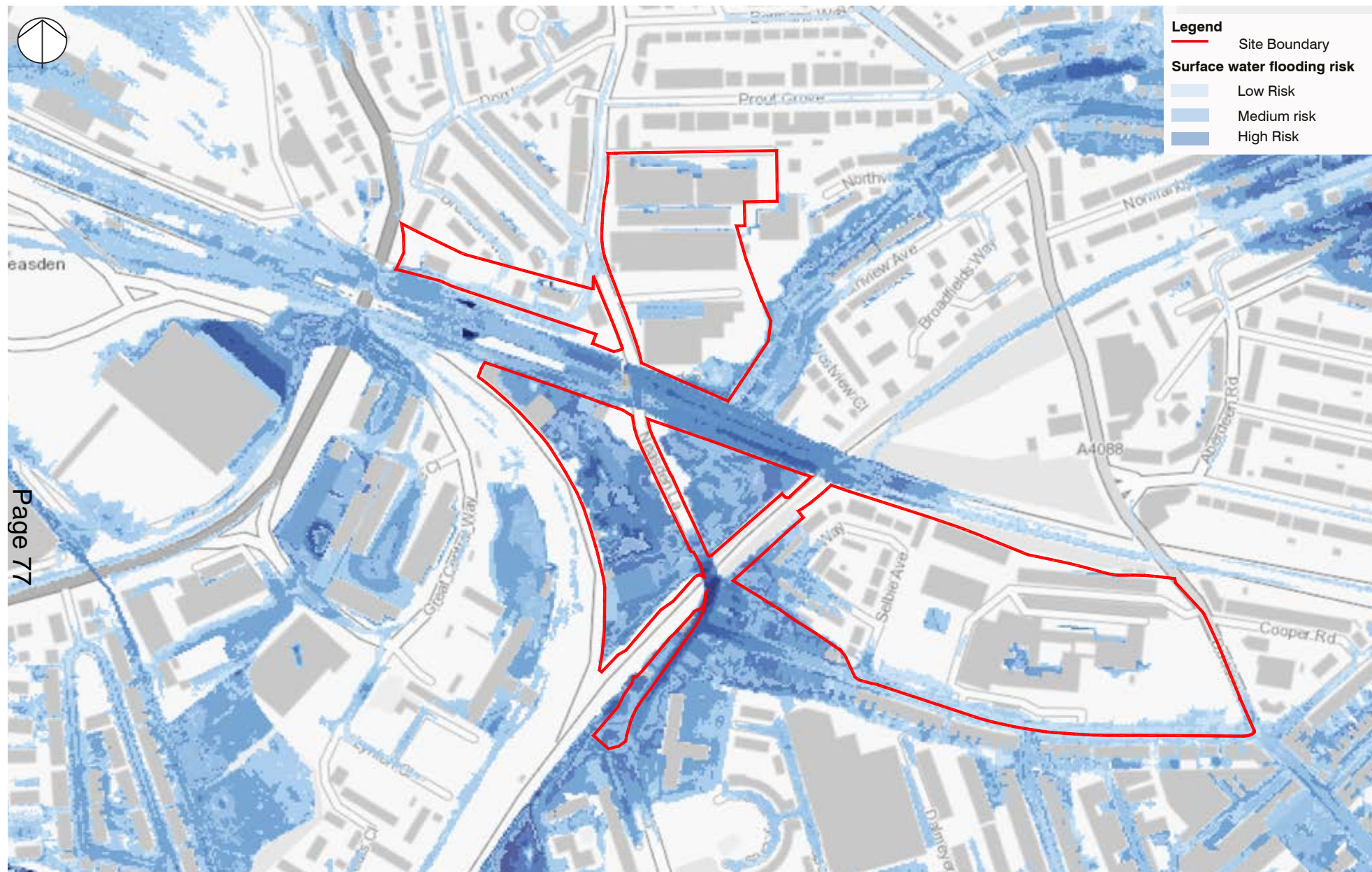


Figure 13: NSGA surface water flooding risk; source: open data gov.uk

Waste and Land Contamination

4.6.5. The McGovern Yard site, which comprises a scrap metal yard, contains waste handling facilities and is protected in accordance with the West London Waste Plan. The existing facilities have been identified as having the practical capacity of approximately 250,000 tonnes per annum. Development at NSGA will need to accommodate the existing waste handling capacity or demonstrate viable off-site re-provision.

Pollution

4.6.6. NSGA is affected by different types of pollution. The presence of an existing and active rail aggregate depot to the west on Great Central Way, the proximity of main roads and operational railways, and the requirement to re-provide industrial uses on-site, will need to be carefully considered. Future development must respect the agent of change principle, and ensure that they do not place unreasonable restrictions on non-residential uses.

4.6 ENVIRONMENT

Air Quality

4.6.1. The majority of the borough, including NSGA, is within an Air Quality Management Area (AQMA). Brent meets all national air quality targets except on two pollutants; nitrogen dioxide (NO₂) and particulate matter (PM₁₀). The Council has specified four Air Quality Focus Areas (AQFA), which include Neasden town centre and Church End. The largest contributors to poor air quality are road transport, local energy generation and construction. NSGA is particularly affected by these factors due to the close proximity of the North Circular Road and a number of industrial and construction sites. Draft Brent Local Plan Policy BSUI2 states that major developments within growth areas and AQFAs will be required to be air quality positive, with off-site mitigation required if standards cannot be met on-site.

Sites of Importance for Nature Conservation (SINC)

4.6.2. Whilst Brent has no nature conservation sites of international importance, there are a range of different habitats across the borough designated as SINC. Within NSGA, the railway tracksides along both the Dudding Hill line and the Chiltern mainline, Jubilee and Metropolitan lines are designated as SINC Grade I, and must be retained or enhanced as key biodiversity corridors.

Flooding

4.6.3. Within NSGA, some land is in Flood Zone 3 and consequently at higher risk of surface water flooding. Areas affected include some highways and railway land and part of the McGovern Yard and O'Hara sites. Future developments must take a sequential approach to the location of buildings and uses proposed to ensure that the risk of flooding on and off-site is not unacceptably increased. More detailed site-specific flood risk assessments should identify and assess the risks of all forms of flooding and demonstrate flood risks will be managed for the lifetime of any development. **Figure 13** shows the surface water flooding risk map.

Heritage

4.6.4. Within NSGA there are no recognised heritage assets, with the nearest being a locally listed building at Shortcroft Mead Court on the east side of Dudden Hill Lane. As shown on the **Policies Map**, the proposed Dollis Hill conservation area is also nearby and creates a more sensitive edge to the eastern part of the CNWL site. Neasden station still retains some historic character, but whilst its side pavilions remain, its hipped roof, chimney stacks, half timbering and loggia were remodelled to its detriment in 1979. However, Neasden station is one of only a few on the southern section of the former Metropolitan railway to still have its original platform buildings intact. Despite significant changes throughout the last century, there is still a rural charm and character to the station and its immediate surroundings.

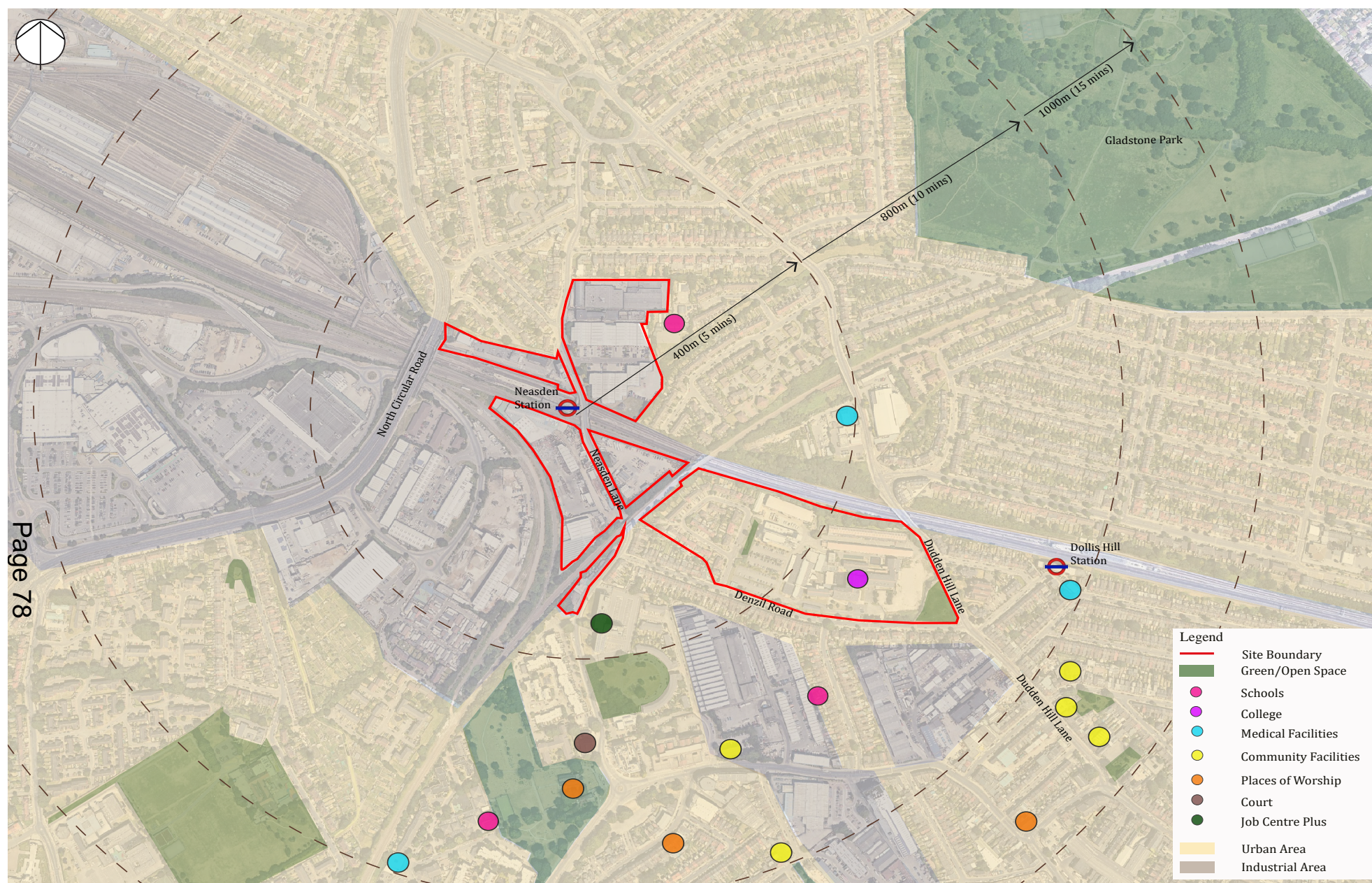


Figure 14: NSGA Social Infrastructure

4.7 SOCIAL INFRASTRUCTURE

Community

4.7.1. NSGA is located within close proximity of a number of community uses as shown in **Figure 14**. This includes medical centres, primary schools, the CNWL sports facilities, a Jobcentre Plus, community centres, places of worship, and Willesden Magistrates Court. Additionally, at 26 Neasden Lane there is a small newsagent, and at 60 Neasden Lane there is affordable desk-based workspace provision as part of a new mixed-use development coming forward on that site.

Health

4.7.2. Within 800 metres (10 minute walk) of NSGA there are medical facilities, with The Willesden Medical Centre also within close proximity. The Council has engaged with Brent Clinical Commissioning Group (CCG) and the Healthy Urban Development Unit (HUDU) to identify and address local health and social care needs to support a new community at NSGA. It has been determined that there should be sufficient capacity within existing primary care buildings. However, given the phasing and delivery timescales for NSGA, there may be need for an upgrade or reconfiguration of local health facilities, for example from non-clinical to clinical space or mental health services.

Education

4.7.3. NSGA is sustainably located in terms of school provision, with several primary and secondary schools within the area capable of absorbing future demands generated by future development. Within two miles of NSGA there are 36 primary schools and two all through schools. Within three miles of NSGA, there are 12 secondary schools and two all through schools. These figures do not include the proposed 6FE secondary school due to open on the nearby Chancel House site by 2022, which is adjacent to NSGA. Brent's School Place Planning Strategy 2019 shows that the area currently has sufficient capacity to meet primary school needs to 2031, and secondary school needs to 2035. The early years' provision is also sufficient with 40 vacancies in Dudden Hill ward for 0-5 year olds.

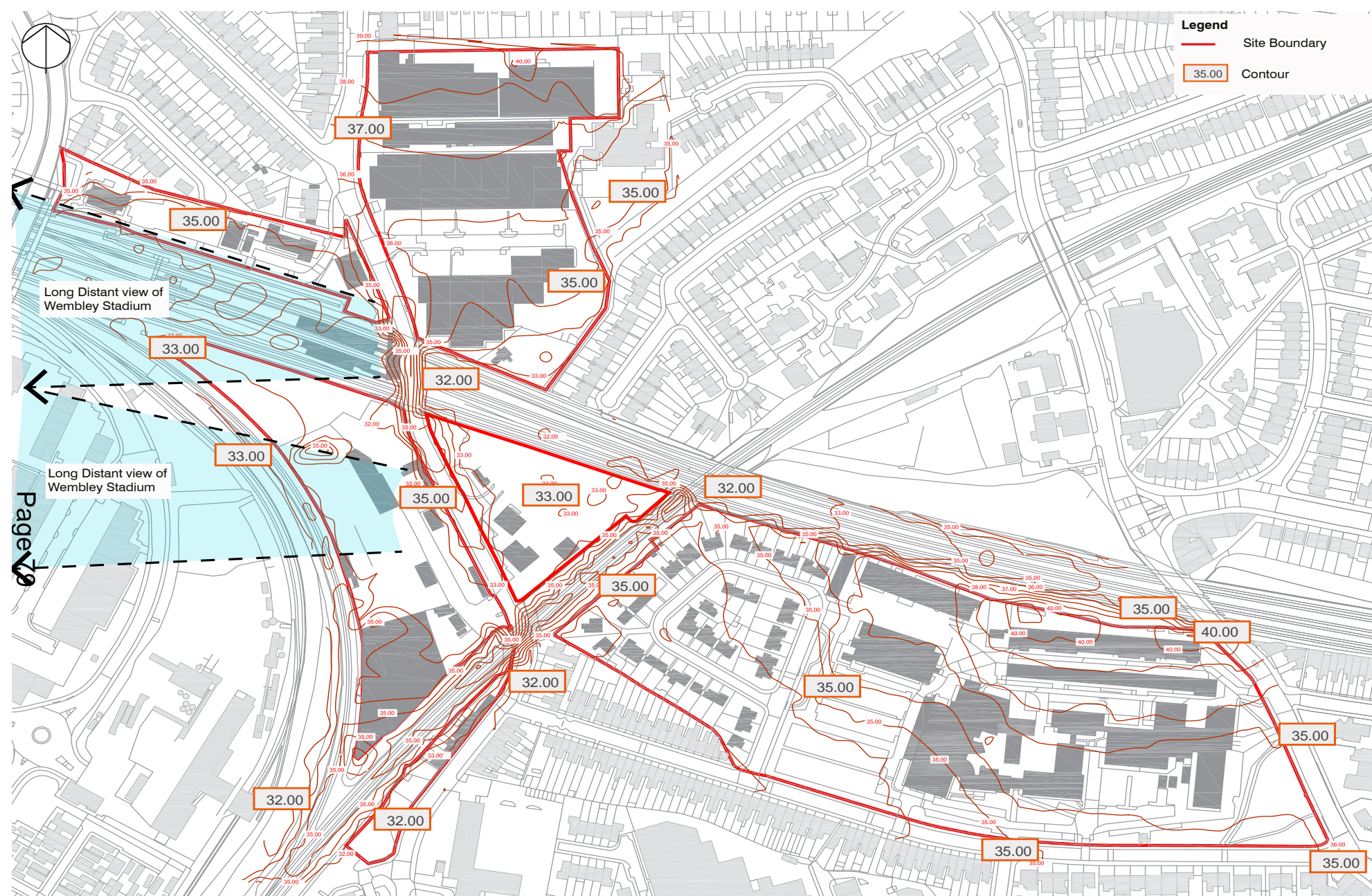


Figure 15: Topography and views

4.8 TOPOGRAPHY AND VIEWS

4.8.1. The NSGA has complex topography, especially on the sites adjacent to the railway line. Both the McGovern Yard and O'Hara sites have over a storey height difference (approximately 4 metres) between their respective entrances and their northernmost edges (adjacent to the existing Neasden station). The CNWL site slopes up from the Denzil Road entrance towards the railway line at the northernmost edge of the site. Most of the other sites within the growth area are relatively flat.

4.8.2. Several landmark buildings act as visual way finders in the wider context of the growth area; this includes views to Wembley Stadium's arch at various locations across NSGA. The existing Telford building within the CNWL site and the grade II listed building Shortcroft Mead Court opposite the CNWL site is visible from several locations, and gradually appears in views as you walk north along Dudden Hill Lane. Views of the warehouses' roofscape also provide an interesting outlook that reflects the industrial character of NSGA. **Figure 15** shows the complex topography and key views across NSGA.

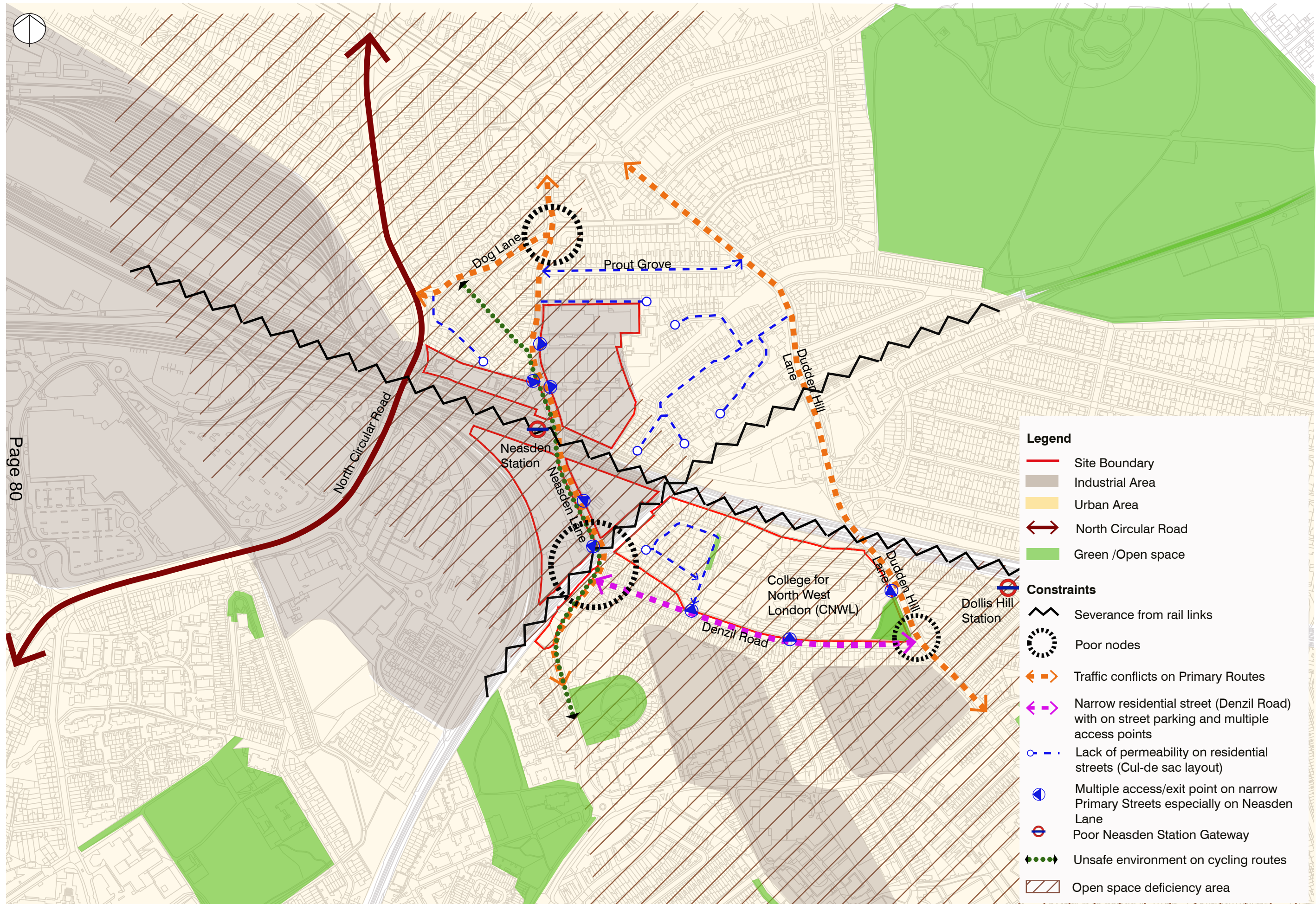


Figure 16: NSGA Constraints

4.9 CONSTRAINTS

4.9.1. Following a baseline analysis of today's NSGA, a summary of some of the key constraints is outlined below and illustrated in **Figure 16**:

- Severance caused by railways, main roads and dead end cul-de-sacs;
- Complex topography;
- Fragmented land ownership;
- Open space deficiency;
- Lacks sustainable movement network: pedestrian/cycle routes, public transport links to wider area;
- Poor quality public realm and active frontage;
- Flood risk and surface water;
- Below ground utilities;
- Proximity of active industrial and freight uses; and
- Wastes uses and contaminated land.

This section must be read in conjunction with the other maps that identify these constraints in **Section 4**.



Severance from rail hindering east west connections to Wembley



View showing complex and difficult topography



Proximity to active industrial and freight uses



Unattractive and poor quality environment resulting in a lack 'of sense of place'



5. TOMORROW'S NEASDEN STATIONS GROWTH AREA

5.1 GROWTH CAPACITY

5.1.1. To understand the growth capacity within NSGA, a number of masterplan capacity studies have been undertaken. These are high-level tests that determine an appropriate quantum of development that can be sustainably delivered. Each masterplan capacity study is informed by one of three scenarios (see **Section 5.2**) and underpinned by the vision, objectives and planning policy context set out in this Masterplan SPD.

5.1.2. The masterplan capacity studies do not represent the only possible masterplan response or site-specific design proposals that could have been generated by the three scenarios. Instead, they have responded to and informed a robust urban design framework comprising principles intended to guide the comprehensive regeneration of the growth area (see **Section 6**). As such, proposals for individual development sites will be assessed on their own merits, against these principles, and what they bring to the growth area.

5.2 MASTERPLAN CAPACITY STUDY SCENARIOS

5.2.1. Each masterplan capacity study scenario is informed by a different approach to industrial intensification and residential co-location, as summarised below. Within each scenario, options respond to existing public transport accessibility with alternative options reflecting the increased accessibility generated by the proposed West London Orbital (WLO) line:

1. Horizontal co-location (Option 1 and Option 4);
2. Vertical co-location (Options 2a/2b and Options 5a/5b);
3. Optimised co-location; vertical with maximised residential (Option 3 and Option 6);

5.2.2. An additional scenario, which co-locates residential with educational uses on the CNWL site has also been tested as part of the study. Each scenario tests sub-options that determine an appropriate quantum of development.

5.2.3. For the purposes of illustrating and better understanding the masterplan capacity studies they have been combined together where the scenarios are the same, but outcomes are different. **Figure 17** shows the site plan and breakdown of individual development sites for reference.

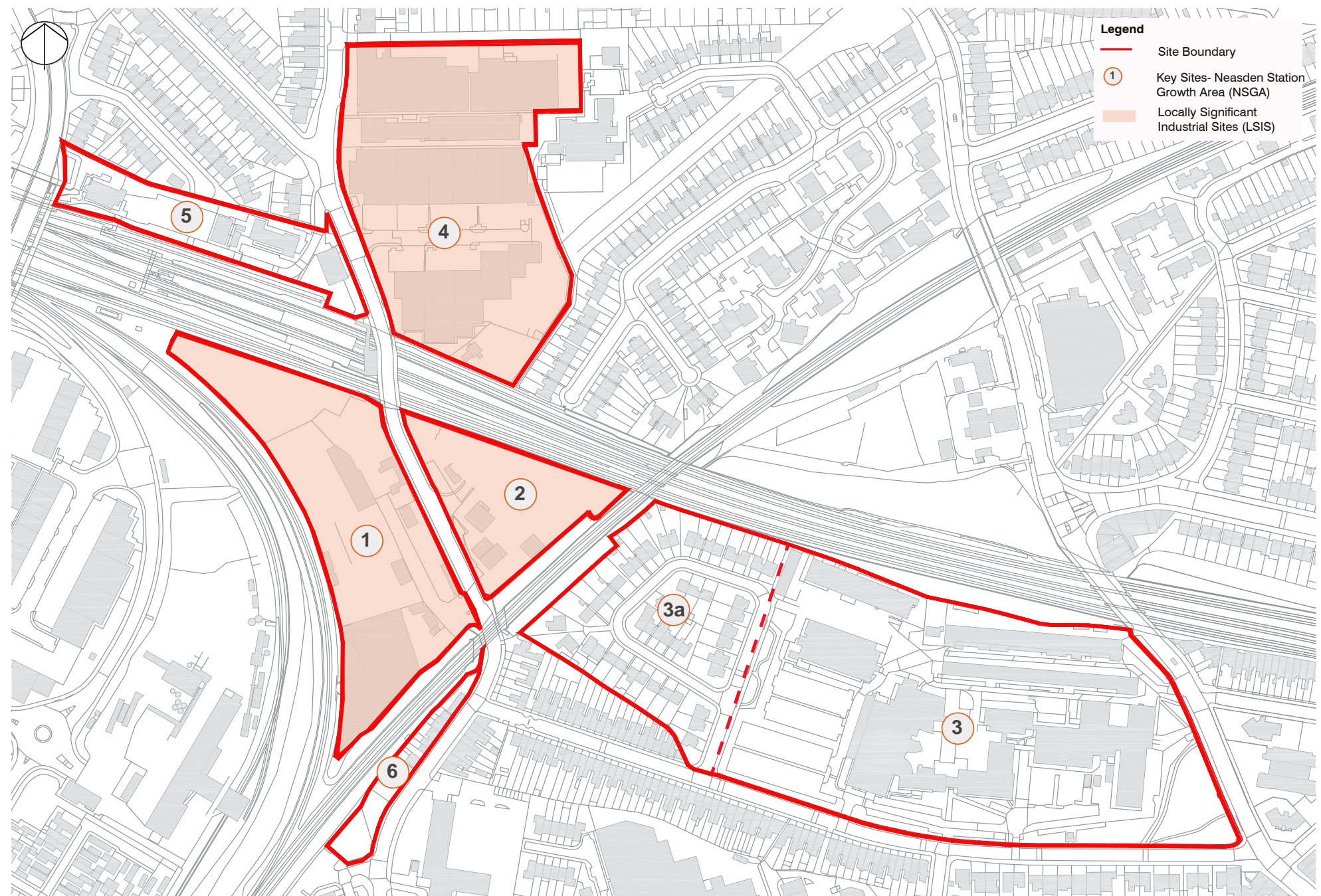


Figure 17: NSGA Site Plan

Scenario 1: Horizontal Co-location

Option 1:

Option 1 tests the maximum development that can be achieved on all sites for scenario 1 (Horizontal co-location) without the WLO provision.

5.2.4. Option 1 tests horizontal co-location by splitting Site 1 (LSIS) and Site 2 (LSIS) into industrial and residential areas sitting alongside each other, with separate access to industrial and residential uses. Option 1 proposes predominantly residential development on Site 3 (CNWL) and retention of the existing housing estate (Site 3a) adjacent. On Site 4 (LSIS), industrial uses (Falcon Park Industrial Estate), are retained given their current good condition and functionality. On Site 5, predominantly residential use is proposed. Site 6 is proposed to be retained as existing and is deemed unviable for development. **Figure 18** and **Table 1** shows masterplan capacity study and breakdown for Option 1.

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Option 1	
No. of units across NSGA	1719
Industrial Floor Space	27308m2
Commercial/Retail Floor Space	1075m2
Additional Industrial Floor Space	2016m2

Table 1: Capacity breakdown across NSGA for option 1



Figure 18: Masterplan Option 1- Horizontal Co-location (without WLO)



Illustrative 3d massing sketch of Option 1- Horizontal Co-location

Option 4:

Option 4 tests the maximum development that can be achieved on all sites for scenario 1(horizontal co-location) with the WLO provision.

5.2.5. Option 4 also tests horizontal co-location by splitting the Site 1 (LSIS) and Site 2 (LSIS) into industrial and residential areas sitting alongside each other, with separate access to industrial and residential uses. Option 4 proposes a mixed-use residential development on Site 3 (CNWL) with some commercial/retail and community functions and retention of the existing housing estate adjacent (Site 3a) to the college site. On Site 4 (LSIS), co-location of industrial uses with residential uses is proposed to meet the future housing and employment demands of the area, which the WLO line will support. On Site 5, predominantly residential use with some light industrial use is proposed. Site 6 is proposed to be retained as existing and is deemed unviable for development. WLO line provision means Option 4 will be suitable for higher densities than Option 1. **Figure 19** and **Table 2** shows masterplan capacity study and breakdown for Option 4.

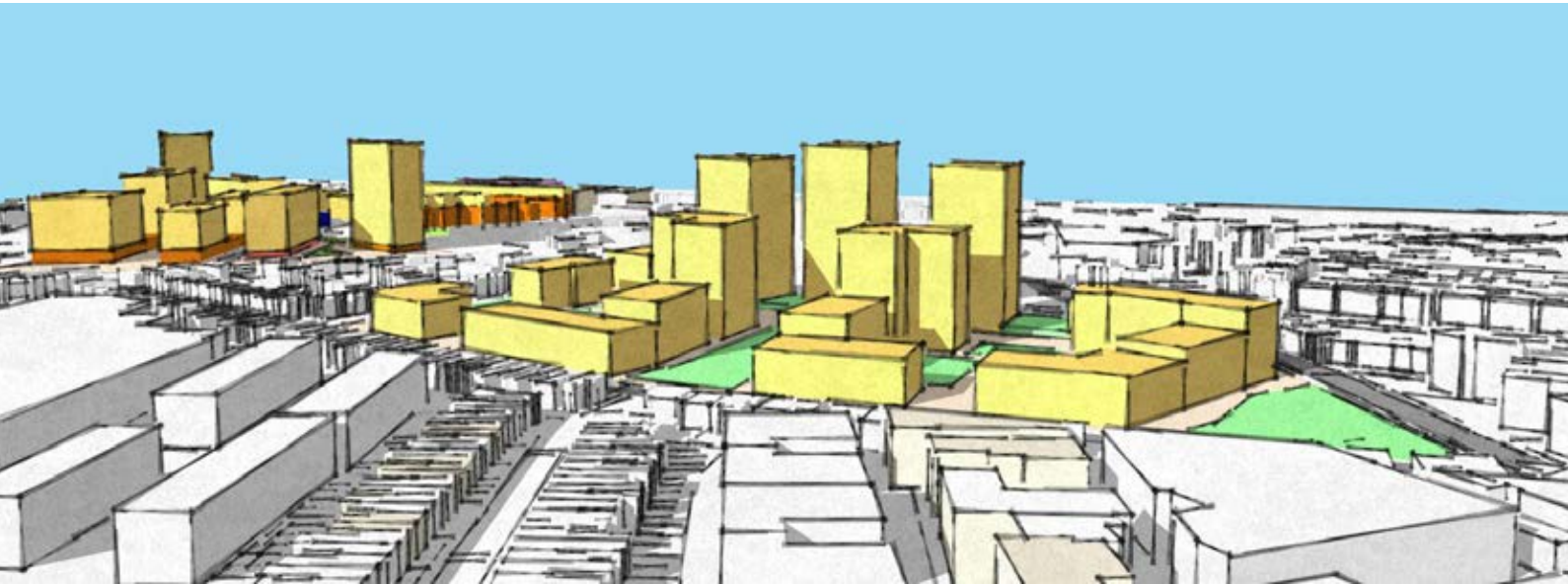
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Option 4	
No. of units across NSGA	2069
Industrial Floor Space	27308m2
Commercial/Retail Floor Space	1200m2
Additional Industrial Floor Space	1016m2

Table 2: Capacity breakdown across NSGA option 4



Figure 19: Masterplan Option 4- Horizontal Co-location (with WLO)



Illustrative 3d massing sketch of Option 4- Horizontal Co-location

Option 2a and 2b:

5.2.6. Option 2 tests vertical co-location by stacking residential uses over industrial or commercial/retail uses on Site 1 (LSIS) and Site 2 (LSIS). Option 2a proposes residential stacked on industrial uses, while Option 2b proposes residential uses stacked on commercial/retail uses. Option 2 proposes predominantly residential development on Site 3 (CNWL) and retention of the existing housing estate adjacent. On Site 4 (LSIS) industrial uses (Falcon Park Industrial Estate) are retained given their current good condition and functionality, with some vertically stacked residential units above. On Site 5, predominantly residential use with some light industrial use is proposed. Site 6 is proposed to be retained as existing and is deemed unviable for development. **Figure 20** and **Table 3** and **4** shows typical masterplan capacity study and breakdown for Option 2a and 2b.

Option 2a	
No. of units across NSGA	2074
Industrial Floor Space	26808m2
Commercial/Retail Floor Space	1300m2
Additional Industrial Floor Space	1416m2

Option 2b	
No. of units across NSGA	2074
Industrial Floor Space	16508m2
Commercial/Retail Floor Space	13950m2
Additional Industrial Floor Space	8884m2

Legend

- Site Boundary
- Planning consent granted**
 - Hotel
 - Mixed-Use Residential
- Land Use and infrastructure**
 - Residential / Mixed -Use Residential (A1/A2)
 - Industrial/Affordable workspace(B1/B2/B8)
 - Retained Industrial use
 - Existing green space
 - Proposed green open space
 - Landscape mitigation for surface water flooding risk
 - Commercial/Retail GF /Active frontage
 - Industrial/ Affordable workspace
- Proposed movement network**
 - Proposed movement network
 - Industrial vehicular movement
 - Turning radius
 - Major links
 - Site access
 - Proposed pedestrian/ cycle bridge
 - Neasden Station
 - Proposed WLO Station

Provision for pocket park and green buffer to rail corridor

Approved planning application (17/2477, 17/1296)

Provision for pocket parks, landscaped green open space and amenities

Biodiversity corridor

Provision for landscape and amenities

Provision for a large accessible public open space

Provision for landscape and amenities

Provision for pocket parks, landscaped green open space and amenities

Provision for pedestrian/cycle link across railway corridor

Neasden Station

Proposed WLO Station

Neasden Stations Growth Area | Masterplan SPD 51

Option 5a and 5b:

Option 5a and 5b tests the maximum development that can be achieved on all sites for scenario 2 (vertical co-location) with the WLO provision.

5.2.7. Option 5 tests vertical co-location by stacking residential uses over industrial or commercial/retail functions on site 1 (LSIS) and site 2 (LSIS). Option 5a proposes residential stacking on industrial uses, while option 5b proposes residential uses stacked on commercial/retail function on these sites.

5.2.8. Option 5 proposes predominantly residential development on site 3 (CNWL) and retention of the existing housing estate adjacent to the college site. On site 4 (LSIS), industrial uses (Falcon Industrial Estate) are retained given their current good condition and functionality, with some vertically stacked residential units on top. On site 5, predominantly residential use with some light industrial uses is proposed. Site 6 is proposed to be retained as existing and is deemed unviable for development. WLO line provision on this option means it will be suitable for higher densities than options 2a and 2b. **Figure 21** and **Table 5** and **6** shows masterplan capacity study and breakdown for Option 5a and 5b.

Option 5a	
No. of units across NSGA	2452
Industrial Floor Space	26768m2
Commercial/Retail Floor Space	1050m2
Additional Industrial Floor Space	1476m2

Table 5: Capacity breakdown across NSGA for option 5a

Option 5b	
No. of units across NSGA	2452
Industrial Floor Space	22308m2
Commercial/Retail Floor Space	5800m2
Additional Industrial Floor Space	2984m2

Table 6: Capacity breakdown across NSGA for option 5b



Figure 21: Typical Masterplan Option 5a (Industrial) and 5b (Commercial)- Vertical Co-location (with WLO)



Illustrative typical 3d massing sketch of Option 5a(Industrial) and 5b(Commercial)- Vertical Co-location

Scenario 3: Optimised co-location

Option 6:

Option 6 tests the maximum development that can be achieved on all sites with the proposed WLO provision.

5.2.9. Option 6 proposes vertical stacking of residential uses on podium floors with industrial below and some commercial/retail fronting Neasden Lane is proposed on Site 1 (LSIS) and Site 2 (LSIS). On site 3, it proposes predominantly residential development with some commercial/retail/ community uses, and the redevelopment of the existing housing estate adjacent to CNWL site. On Site 4 (LSIS), vertical co-location of residential use with industrial use is proposed. On Site 5, predominantly residential use with some light industrial use is proposed. Site 6 is proposed to be retained as existing and is deemed unviable for development. WLO line provision on this option means it will be suitable for higher densities than Option 3. **Figure 22** and **table 7** shows masterplan capacity study for Option 6.

Please note: The existing housing estate adjacent to the CNWL (3a) is a long term aspiration and is not suggested for redevelopment in the short and medium term.

Option 6	
No. of units across NSGA	2452 - 3015
Industrial Floor Space	26160m2
Commercial/Retail Floor Space	1800m2
Additional Industrial Floor Space	868m2

Table 7: Capacity breakdown for option 6 across NSGA



Figure 22: Masterplan Option 6- Optimised Co-location (with WLO)



Figure 23: Masterplan Option 3 Optimised Co-location (without WLO)

Preferred Option

Optimised Co-location Option 3:

Option 3 tests the maximum development that can be achieved on all sites without the proposed WLO provision.

5.2.10. Option 3 proposes vertical stacking of residential uses on podium floors with industrial below and some commercial/retail fronting Neasden Lane is proposed on Site 1 (LSIS) and Site 2 (LSIS). On site 3 (CNWL), proposes predominantly residential development with some commercial/retail/community uses and retention of the existing housing estate adjacent. On Site 4 (LSIS), vertical co-location of residential uses with industrial uses is proposed. On Site 5, predominantly residential use with some light industrial use is proposed. Site 6 is proposed to be retained as existing and deemed unviable for development. **Figure 23** and **Table 8** and **9** shows masterplan capacity study and breakdowns for Option 3.

Summary

5.2.11. Having tested a number of different scenarios to understand and establish the appropriate quanta of development for NSGA, both with and without the WLO line, the Council is taking forward the optimised co-location scenario as its approach to future development. Consequently, the urban design framework set out in **Section 6** is based on Option 3.



Illustrative 3D massing sketch- Optimised Co-location Option 3

Option 3	
No. of units across NSGA	2338
Industrial Floor Space	26160m2
Commercial/Retail Floor Space	1600m2
Additional Industrial Floor Space	768m2

Table 8: Capacity breakdown for option 3 across NSGA

No.	Sites	Existing Site Area (Ha)	Existing Site Area (Sqm)	Existing Floor Area Ratio(FAR)	New Floor Space (Industrial)	New Floor Space (Commercial)	New Floor Area Ratio (FAR)	No. of Units
1	McGovern Yard Site	1.75	17500	0.61	10700	950	0.61	520
2	O' Hara Site	0.74	7400	0.1	1000	100	0.13	312
3	CNWL Site	5.84	58400	-	-	550	-	1100
4	Falcon Industrial Estate Site	1.61	16100	0.86	14000	0	0.86	341
5	Dephna House Site	0.68	6800	-	460	0	-	65
6	Neasden Lane Service Station Site	0.21	2100	-	-	-	-	-
	Total	-	-	-	26160	1600	-	2338

Table 9: Individual site capacity breakdown Option 3



6. URBAN DESIGN FRAMEWORK

6.1 OVERVIEW

6.1.1. Based on the masterplan capacity studies outlined in **Section 5.2**, a robust urban design framework has been set out comprising principles intended to guide the comprehensive regeneration of the growth area. These include:

- **Development Principles** – that set out what development at NSGA will need to achieve and the key factors to be considered;
- **Environmental and Sustainability Principles** – that set out how development at NSGA will need to perform to support climate change resilience and achieve net-zero carbon.

6.1.2. These principles are supplemented by sections that set out how much development could be accommodated and where it should go (see **Section 6.3**), and what character each part of the growth area should have (see **Section 6.4**). In terms of development amount, the quantum of residential uses is considered to be flexible, whereas other uses, such as replacement industrial floorspace and supporting infrastructure, are regarded as fixed to ensure policy compliance.

6.2 CHARACTER AREAS

6.2.1. To help translate the capacity study outcomes for each masterplan scenario (see **Section 5.2**) into site-specific development principles, a number of character areas have been defined, setting out a vision for each development site within the growth area. Character areas generally relate to individual development sites though some have been grouped together based on geography or mutual dependence. Although character areas will vary, NSGA should knit together as a single identifiable neighbourhood.

6.2.2. Each character area appraisal includes a description of the existing site or sites followed by a high-level assessment of the existing character, and finally a vision for the future character. A summary table sets out the key elements of each character area followed by the relevant planning policy and guidance to be considered. **Figure 24** illustrates the distribution of character areas across NSGA.

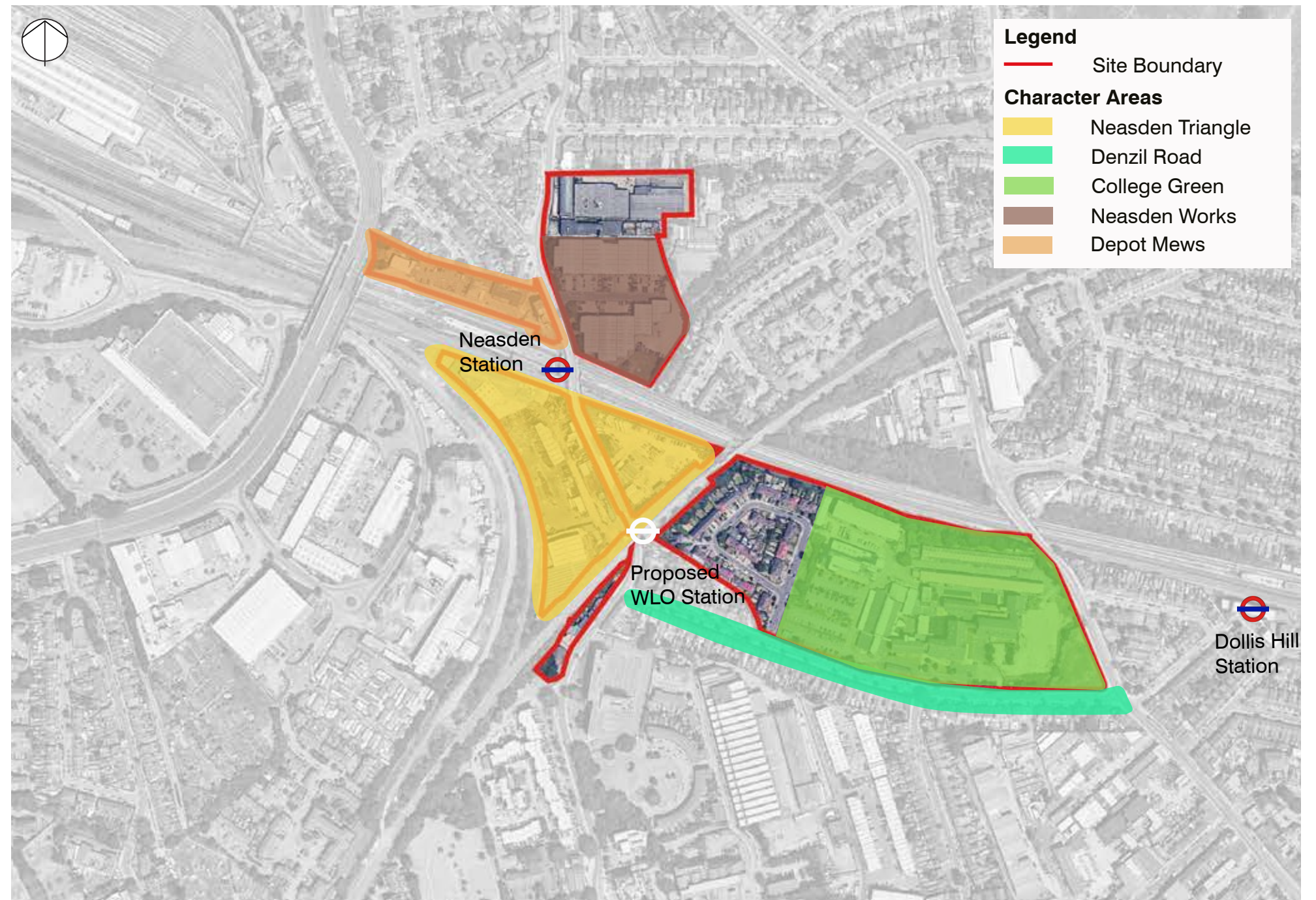


Figure 24: Character Area Map- NSGA

Neasden Triangle



Figure 25: Illustrative sketch along Neasden Lane across the centre of the Neasden Triangle character area

Character Area: Neasden Triangle	
Landuse	Co-location; industrial (light or heavy/logistics); commercial; residential; some retail and community on Neasden Lane
Street width	24-27m building to building (across Neasden Lane)
Street type and connectivity	Primary; public transport; enhanced walking and cycling; east-west connection from Neasden to Wembley via new bridge
Building type, height and massing	No preferred building types; mid-rise apartment blocks; 8-14 storeys, high-rise apartment blocks; 15-22 storeys; podium
Landscape and open space type	Yards; intensified SINC; street trees; SUDS; surface water management (see Section 6.3 for open space provision)

Table 13: Character area, Neasden Triangle



Figure 26: Illustrative sketch of the proposed WLO interchange, Neasden Triangle character area

Description

6.2.3. Neasden Triangle informally refers to a triangular site to the south of Neasden station, formed by a series of railways. It is bounded by the Chiltern mainline to the north, the Dudding Hill line to the south and a 'curve' line that connects them to the west. It is also bisected by Neasden Lane running north to south between Neasden and Church End town centres. In terms of development sites, the Neasden Triangle character area relates to the O'Hara and McGovern Yard sites, located to the east and west of Neasden Lane respectively.

6.2.4. Neasden Triangle is considered to be the heart of the growth area based on its proximity to the existing Neasden station and proposed WLO line station. Consequently, it forms a gateway to the growth area and has the potential to support high density development and tall buildings, complemented by new public realm. Through its good connections to the strategic road network, regeneration here also has the potential to support the intensification of industrial uses and their co-location with new residential uses. As such, a character is required here that defines a mixed-use place and ties the different parts of the growth area and its surroundings together.

Existing Character

6.2.5. Both sites within Neasden Triangle are industrial in use and character and make a limited contribution to the streetscape. Surrounded by tall walls and security fences, both sites present a hostile and inactive frontage to Neasden Lane. To the east, the O'Hara site is a large yard occupied by a number of small single storey sheds. To the west, the McGovern Yard site is also a yard but is occupied by larger single and two storey warehouses. Aside from a small number of mature trees along the western edge of the O'Hara site, and the designated wildlife corridors and SINC that form the edges to the railway lines, the area has a very poor sense of greenery. Within the sites themselves, there is a dominance of hard landscaping.

Future Character

6.2.6. Street-facing blocks with active uses at the lower floors should be proposed to reinforce the street frontage along Neasden Lane and animate the streetscape. This should include a small neighbourhood parade to support existing and new residents within close proximity. Neasden Lane should be widened to establish appropriate building to building distances and accommodate the necessary active travel and green infrastructure improvements. Within the sites themselves, design teams are invited to test a range of building types or forms, with all proposals assessed on their own merits against the relevant placemaking principles. Whilst it is considered that Neasden Triangle can accommodate some of the tallest buildings within the growth area, building heights should be varied and appropriately distributed across the sites to avoid a consolidation of height in one area (see Tall Buildings Strategy 2021). Walking and cycling should be prioritised along Neasden Lane, with a connection made through the McGovern Yard site to Wembley via a new pedestrian and cycle crossing over the railway. Open spaces should be defined within each site to ground the buildings and create a new layer of public realm that is secondary to Neasden Lane. Designated wildlife corridors and SINC at the edges should be intensified, with new tree planting across both sites. Critically, sustainable urban drainage systems (SUDS) and other surface water management measures should be incorporated on the O'Hara site to support flood risk mitigation. **Figure 25** and **Figure 26** are illustrative sketches of the Neasden Triangle and **Table 13** shows the breakdown of acceptable design parameters of the character area.

Denzil Road



Figure 27: Illustrative sketch of Denzil Road along CNWL site

Character Area: Denzil Road	
Landuse	Residential; some retail, commercial and/or workspace adjacent to Dudden Hill Lane
Street width	18m building to building
Street type and connectivity	Local; low-traffic; enhanced walking and cycling; connections to Church End Growth Area
Building type, height and massing	Terraced houses; maisonettes; low-rise apartment blocks; 3-5 storeys; linear, street-facing blocks
Landscape and open space type	Street trees; SUDS; shared surfaces; front gardens; parklets (see Section 6.3 for open space provision)

Table 14: Character area, Denzil Road

Description

6.2.7. Denzil Road is a residential street lined with semi-detached and terraced houses to the south and the CNWL site to the north, as far as Selbie Avenue. Beyond Selbie Avenue, it is lined with terraced houses to the north up to the junction with Neasden Lane. A small estate of semi-detached and terraced houses located on Severn Way is accessed via Selbie Avenue. Denzil Road is accessible by vehicles from both Dudden Hill Lane to the east and Church End High Road via Brenthurst Road to the south. At the western end, a gate prohibits vehicle access from Neasden Lane.

6.2.8. The Denzil Road character area relates to the southern part of the CNWL site. As the largest development site in single ownership within the growth area, the CNWL site is expected to come forward in its entirety, though the density and scale of development it can accommodate will vary across its extents. Based on the relationships between the site and its surroundings, it is considered necessary to make a distinction between the character of its northern and southern parts. Whilst the northern part has the potential to support high density development and tall buildings, the southern part forms a boundary with the prevailing two storey context. As such, a character is required here that relates to and enhances the existing character of Denzil Road, whilst transitioning to the new character of the wider CNWL site.

Existing Character

6.2.9. Whilst much of Denzil Road is lined with on-street car parking, the overall character is that of a fairly low-traffic street, particularly at the western end. Mature and semi-mature trees contribute to a moderate sense of greenery and are complemented by additional planting in front gardens, though most have been paved over. Whilst the residential frontages help to animate the streetscape of Denzil Road, the CNWL site is surrounded by a tall security fence that presents a hostile and inactive frontage. A small designated open space at the junction with Dudden Hill Lane provides some visual amenity, but is of unremarkable character except for the adjacent memorial stone to PC Ronan McCloskey.

Future Character

6.2.10. Linear, street-facing residential blocks should be proposed to reinforce the street frontage to the north of Denzil Road, and private and communal entrances, front gardens and incidental play space incorporated to animate the streetscape. Building heights should establish a transitional scale between the growth area and its surroundings. Walking and cycling should be prioritised to support other active travel infrastructure in the area, and connections to green infrastructure and the adjacent Church End Growth Area should be carefully considered. On-street car parking should be reduced where possible, and street trees, parklets and SUDS incorporated to improve biodiversity, air quality and water management. **Figure 27** and **Table 14** shows an illustrative sketch and breakdown of acceptable design parameters of the character area.

College Green



Figure 28: Illustrative sketch of Public Open Space on College Green, CNWL site

Character Area: College Green	
Landuse	Residential; possibly some community
Street width	18-24m building to building
Street type and connectivity	Local; low-traffic; enhanced walking and cycling; east-west connection from Dudden Hill Lane to Selbie Avenue
Building type, height and massing	Mansion blocks; 5-8 storeys, high-rise apartment blocks; 15-22 storeys; courtyard blocks; towers and podiums
Landscape and open space type	Communal courtyards; street trees; SUDS; front gardens (see Section 6.3 for open space provision)

Table 15: Character area, College Green

Description

6.2.11. Opened as the Willesden College of Technology in 1934, the College of North West London (CNWL) occupies a site of approximately 3.9 hectares. It is bounded by Dudden Hill Lane to the east, Denzil Road to the south, Selbie Avenue to the west and the Chiltern mainline to the north. The site is populated by a number of buildings ranging from one to four storeys in height. A five storey block in the eastern part of the site was demolished in 2015. The main entrance to the site was consequently relocated from Dudden Hill Lane to Denzil Road.

6.2.12. The College Green character area relates to the northern part of the CNWL site. Whilst the southern part forms a boundary with the prevailing two storey context, the northern part has the potential to support high density development and tall buildings, anchored by a new public open space. As such, a character is required here that defines a new place and celebrates the qualities of urban living.

Existing Character

6.2.13. Despite its prominent location, the overall character of the site is unremarkable and lacking in civic presence. Attributed to its redevelopment throughout the late 1980s and early 1990s, which involved the demolition of the original double fronted courtyard block, the site makes a limited contribution to the streetscape and architectural character of the area. Buildings are set back from the edges of the site, leaving undefined strips of grass and tree planting around the perimeter, enclosed by a tall security fence. Whilst the site is bookended by small designated open spaces on Dudden Hill Lane to the east and Selbie Avenue to the west, and bounded by a designated wildlife corridor to the north, it has a poor sense of greenery. Within the site itself, there is a dominance of hard landscaping interspersed by some small areas of grass or planting.

Future Character

6.2.14. A new local street running east to west from Dudden Hill Lane to Selbie Avenue should be defined as the backbone of the character area. To the south, perimeter blocks enclosing communal courtyards should be proposed and form the edges to a new public open space at the centre of the site. To the north, a cluster of tall buildings rising from ground or podium level should be proposed, lining the edge of the site adjacent to the railway. Building heights should step up from south to north, continuing the transitional scale between the growth area and its surroundings, established by the Denzil Road character area. Building heights should step down to Dudden Hill Lane and Selbie Avenue. Existing greenery at the edges should be drawn into the depth of the site, establishing a network of green infrastructure that improves biodiversity and microclimate mitigation. Car parking should be reduced where possible, with any new vehicle access roads into the site kept to a minimum. **Figure 28** and **Table 15** shows an illustrative sketch and breakdown of acceptable design parameters of the character area.

Neasden Works and Depot Mews

Neasden Works

Description

6.2.15. The Neasden Works character area includes the Falcon Park Industrial Estate, which represents a longer term development site. It is bounded by both Northview Primary School and properties in Southview Avenue to the east, the Jubilee and Metropolitan lines to the south and Neasden Lane to the west. To the north, it is bounded by a vacant site at 58 Neasden Lane, and a new residential-led mixed-use development currently under construction at 60 Neasden Lane. The primary vehicle access point on Neasden Lane is opposite Dephna House. A public footpath runs along the southern edge between the site and the railway connecting Southview Avenue to Neasden Lane.

Existing Character

6.2.16. The site is light industrial in use and character, and is occupied by two large warehouse blocks either side of a vehicle access road running west to east. Each warehouse block is fronted by a small forecourt with associated car parking. At the western end of the site, the vehicle access road terminates at a large yard to the rear of Units 7 and 8. Surrounded by low walls and fences, the site has a moderate sense of greenery, with low hedges and a small number of semi-mature trees along the western edge. At the southwest corner of the site there is a grassed area containing a water pump house possibly associated with the Cricklewood Pumping Station. Within the site itself though, there is a dominance of hard landscaping.

Future Character

6.2.17. Street-facing blocks with active uses at the lower floors should be proposed to reinforce the street frontage along Neasden Lane and animate the streetscape. These should primarily include light industrial or ‘maker’

spaces, and should be anchored by a landscaped yard space at the centre of the site. Whilst it is considered that Neasden Works can support building heights up to 14 storeys, the tallest buildings should be consolidated in the southern part of the site adjacent to Neasden station. Again, walking and cycling should be prioritised along Neasden Lane. Permeability across the site should also be considered, and design teams are invited to test whether a connection can be made to the footpath connecting Southview Avenue and Neasden Lane, with improvements encouraged here in any event. Designated wildlife corridors and greenery at the edges should be intensified with new tree planting across the site. SUDS and other surface water management measure should be incorporated to support flood risk mitigation. **Table 16** shows a breakdown of acceptable design parameters within the character area.

Depot Mews

Description

6.2.18. The Depot Mews character area relates to the Dephna House development site on Neasden Lane and includes the eastern part of Neasden Depot. It is bounded by Neasden Lane to the east, the Jubilee and Metropolitan lines to the south, the North Circular Road to the west and properties in both Brendon Avenue and Neasden Close to the north. It has a single vehicle access point on Neasden Close, which forms the eastern entrance to Neasden Depot. A public footpath runs along the northern edge connecting Neasden Close to Brendon Avenue.

Existing Character

6.2.19. Despite its prominent location adjacent to Neasden station, the overall character of the site is unremarkable. Dephna House itself is a five storey commercial building that occupies the eastern part of the site on

Neasden Lane, and has been largely converted to residential use. Whilst the windows appears to have been recently replaced, the façade itself is poor quality and has been damaged or vandalised in some areas. To the rear, the vehicle access road enters the site from the north, turning to run east to west alongside the railway. The eastern part of Neasden Depot, between Dephna House and the North Circular Road, is occupied by three ancillary buildings of between one and two storeys in height, and a small car park. There is a level change of approximately one storey between here and Neasden Lane where Dephna House rises to only four visible storeys. Surrounded by tall security fences, the site also presents a hostile frontage to Neasden Lane and has a very poor sense of greenery. Within the site itself, there is a dominance of hard landscaping.

Future Character

6.2.20. Based on the topography of the site and the interface with Neasden Depot, a podium should be proposed across its extents with residential blocks above. Due to the proximity of existing residential properties to the north of the site, it is considered that Depot Mews can only support building heights up to four storeys to the west, rising to seven storeys in the east. As such, a street-facing block with active uses at the lower floors should be proposed as a replacement for Dephna House to reinforce the street frontage along Neasden Lane and animate the streetscape. At podium level, a series of interconnected podium courtyards should enhance the sense of greenery on the site, and provide amenity space for the residential uses. Permeability across the site should be considered, with improvements to the footpath between Neasden Close and Brendon Avenue encouraged. Designated wildlife corridors should be intensified with new tree planting across the site. **Table 17** gives a breakdown of acceptable design parameters within the character area.

Character Area: Neasden Works	
Landuse	Co-location; industrial (light/maker); commercial; residential
Street width	21-24m building to building (across Neasden Lane)
Street type and connectivity	Primary; public transport; enhanced walking and cycling; east-west connection from Southview Avenue to Neasden Lane
Building type, height and massing	Perimeter blocks; podiums; mid-rise apartment blocks; 8-14 storeys; some 5-7 storeys
Landscape and open space type	Yard; street trees; SUDS; surface water management (see Section 6.3 for open space provision)

Table 16: Character area, Neasden Works

Character Area: Depot Mews	
Landuse	Residential; possibly some commercial
Street width	21-24m building to building (across Neasden Lane)
Street type and connectivity	Primary; public transport; enhanced walking and cycling; east-west connection from Neasden Close to Brendon Avenue
Building type, height and massing	Podium blocks; mews; 2-4 storeys; mid-rise apartment block; 5-7 storeys on Neasden Lane
Landscape and open space type	Podium courtyards; street trees; intensified ecology

Table 17: Character area, Depot Mews

6.3 DEVELOPMENT AMOUNT

Site 1: McGovern Yard Site

Site 1: McGovern Yard Site	
New and affordable housing target	520 homes (indicative)
Industrial Floor Target	10,700sqm
Commercial Floorspace Target	950sqm (indicative)
Site-specific considerations	<ul style="list-style-type: none">Provision of affordable workspace (minimum 10% floorspace);Some employment opportunities for non or low skilled demographics;Re-provision of permitted capacity for waste handling either on-site or at an agreed alternative site;Adoption of 'agent of change' principle due to on-site industrial uses and existing SIL to the west of the site;Provision of a neighbourhood parade on Neasden Lane (size subject to negotiation);Development should not unacceptably compromise the protected view of Wembley Stadium Arch from the Neasden Lane/Neasden station bridge.
Social infrastructure	<ul style="list-style-type: none">Provision of new multi-functional community facilities at a rate of 370sqm per 1,000 new population. This will be delivered through either on-site facilities or contributions towards existing or new off-site facilities.
Transport infrastructure	<ul style="list-style-type: none">Provision of sufficient space to accommodate new and existing transport infrastructure;Contributions towards the existing Neasden station;Provision of access to the proposed WLO line station;Allowance for widening of Neasden Lane to improve accessibility and active travel provision;Segregation of servicing access and walking and cycling routes (where unacceptable risks likely);Provision of sufficient land and an appropriate setting to facilitate a new pedestrian and cyclist bridge over the railway to Great Central Way;Deliver a new pedestrian and cyclist bridge over the railway to Great Central Way (desirable).
Green and blue infrastructure	<ul style="list-style-type: none">Provision of two 0.2ha pocket parks (potentially via a series of formal and informal play areas);Retention of the ecological status of the existing SINC Grade I: Dudden Hill line and Jubilee/Metropolitan line corridors;Adoption of a sequential approach to the location of uses and buildings through a site-specific flood risk assessment and alignment with the recommendations of the Brent Strategic Flood Risk Assessment Level 2;Development should not unacceptably increase the on or off-site flood risk
Placemaking	<ul style="list-style-type: none">As defined by the Neasden Triangle character area set out in Section 6.2

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Site 2: O' Hara Site

Site 2: O' Hara Site	
New and affordable housing target	312 homes (indicative)
Industrial Floor Target	1,000sqm
Commercial Floorspace Target	100sqm (indicative)
Site-specific considerations	<ul style="list-style-type: none">Provision of affordable workspace (minimum 10% floorspace);Some employment opportunities for non or low skilled demographics;Adoption of 'agent of change' principle due to on-site industrial uses and existing SIL to the west of the site;Provision of a neighbourhood parade on Neasden Lane.
Social infrastructure	<ul style="list-style-type: none">Provision of new multi-functional community facilities at a rate of 370sqm per 1,000 new population. This will be delivered through either on-site facilities or contributions towards existing or new off-site facilities.
Transport infrastructure	<ul style="list-style-type: none">Contributions towards the existing Neasden station;Allowance for widening of Neasden Lane to improve accessibility and active travel provision;Segregation of servicing access and walking and cycling routes (where unacceptable risks likely).
Green and blue infrastructure	<ul style="list-style-type: none">Provision of one 0.2ha pocket parks (potentially via a series of formal and informal play areas);Retention of the ecological status of the existing SINC Grade I: Dudden Hill line and Jubilee/Metropolitan line corridors;Adoption of a sequential approach to the location of uses and buildings through a site-specific flood risk assessment and alignment with the recommendations of the Brent Strategic Flood Risk Assessment Level 2;Development should not unacceptably increase the on or off-site flood risk.
Placemaking	<ul style="list-style-type: none">As defined by the Neasden Triangle character area set out in Section 6.2

Site 3: CNWL Site

Site 3: CNWL Site	
New and affordable housing target	1,100 homes (indicative)
Commercial Floorspace Target	550sqm (indicative)
Site-specific considerations	<ul style="list-style-type: none"> Creation of a district heating network and provision for connection to the wider area; Provision of social infrastructure and community facilities, in the form of a multi-functional neighbourhood centre, at a rate of 370sqm per 1,000 new population.
Social infrastructure	<ul style="list-style-type: none"> Allocation of space for the provision of new health facilities until requirements confirmed by the CCG; Provision of new multi-functional community facilities at a rate of 370sqm per 1,000 new population (or contributions towards equivalent space elsewhere in the growth area).
Transport infrastructure	<ul style="list-style-type: none"> Contributions towards the existing Neasden station; Segregation of servicing access and walking and cycling routes (where unacceptable risks likely); Improvements to junctions at Denzil Road/ Dudden Hill Lane and Denzil Road/Neasden Lane to support safe walking and cycling.
Green and blue infrastructure	<ul style="list-style-type: none"> Retention of existing open space on Dudden Hill Lane or provision of new at equivalent area plus additional 0.4ha; Provision of two 0.2ha pocket parks (potentially via a series of formal and informal play areas); Retention of existing or provision of new sport facilities, including MUGAs and outdoor gym; Retention of the ecological status of the existing SINC Grade I: Dudden Hill line and Jubilee/Metropolitan line corridors; Adoption of a sequential approach to the location of uses and buildings through a site-specific flood risk assessment and alignment with the recommendations of the Brent Strategic Flood Risk Assessment Level 2;
Placemaking	<ul style="list-style-type: none"> As defined by the Denzil Road and College Green character areas set out in Section 6.2

Site 4: Falcon Park Industrial Estate

Site 4: Falcon Park Industrial Site	
New and affordable housing target	341 homes (indicative)
Commercial Floorspace Target	14,000sqm (indicative)
Site-specific considerations	<ul style="list-style-type: none"> Provision of affordable workspace; Employment opportunities for non or low skilled demographics; Adoption of 'agent of change' principle.
Social infrastructure	<ul style="list-style-type: none"> Provision of new multi-functional community facilities at a rate of 370sqm per 1,000 new population. This will be delivered through either on-site facilities or contributions towards existing or new off-site facilities.
Transport infrastructure	<ul style="list-style-type: none"> Contributions towards the existing Neasden station; Segregation of servicing access and walking and cycling routes.
Green and blue infrastructure	<ul style="list-style-type: none"> Provision of one 0.2ha pocket parks (potentially via a series of formal and informal play areas); Retention of the ecological status of the existing SINC Grade I: Dudden Hill line and Jubilee/Metropolitan line corridors.
Placemaking	<ul style="list-style-type: none"> As defined by the Neasden Works character area set out in Section 6.2

Site 5: Dephna House Site

Site 5: Dephna House Site	
New and affordable housing target	65 homes (indicative)
Industrial Floorspace Target	460sqm (indicative)
Site-specific considerations	<ul style="list-style-type: none">• Provision of affordable workspace;• Employment opportunities for non or low skilled demographics;• Adoption of ‘agent of change’ principle.
Social infrastructure	<ul style="list-style-type: none">• Contributions towards existing or new off-site community facilities and social infrastructure.
Transport infrastructure	<ul style="list-style-type: none">• Contributions towards the existing Neasden station;• Segregation of servicing access and walking and cycling routes;• Retention of access to Neasden Depot;• Retention and enhancement of existing footpath between Neasden Close and Brendon Avenue;• Retention and enhancement of existing pedestrian and cycle bridge and underpass adjacent to the North Circular Road at the west of the site.
Green and blue infrastructure	<ul style="list-style-type: none">• Provision of formal and informal play areas;• Retention of the ecological status of the existing SINC Grade I: Dudden Hill line and Jubilee/Metropolitan line corridors.
Placemaking	<ul style="list-style-type: none">• As defined by the Depot Mews character area set out in Section 6.2

Site 6: Neasden Service Station site

6.3.1. Based on a viability assessment, this site is deemed unlikely to come forward for wholesale redevelopment, but may come forward on an individual and smaller site basis for mid-rise intensification.

6.4 DEVELOPMENT PRINCIPLES

6.4.1. Brent has declared a climate and ecological emergency and has set out to achieve carbon neutrality in the borough by 2030. The Brent Climate & Ecological Emergency Strategy 2021-2030 requires a collaborative approach with developers, residents and communities to create a greener, cleaner and more sustainable borough. Consistent with the London Plan and the draft Brent Local Plan, the strategy has set out an objective for homes, buildings and the built environment by 2030. This requires buildings in the borough to be energy efficient, powered by renewable sources and resilient to future adverse weather events caused by climate change. In addition, the Council wants to ensure high standards of environmental performance by reducing carbon emissions through the entire lifecycle of a development, including construction.

6.4.2. Key to unlocking potential, and a significant focus for the guidance in this document, is to provide a way for individual landowners to bring forward development that meets the London Plan and draft Brent Local Plan requirements. The development principles below set out the overall ambitions for NSGA, and will help ensure development is delivered in a coherent and complementary way.

DP1: Maximising potential for the sites

6.4.3. To ensure resilient and efficient growth in the borough, the draft Brent Local Plan sets out a range of crosscutting policies that will take us towards becoming carbon neutral by 2030. The planning and design of a site should ensure that sustainability is considered during from the earliest stages of the design process to ensure a resilient development that is beneficial to the environment.

6.4.4. Draft Brent Local Plan Policy BP2 East Place and site allocation BEGA1A Neasden Stations Growth Area set out an ambition for the redevelopment of NSGA. They identify the importance of the growth area's strategic designation and its role for the delivery of new homes, jobs and infrastructure. In accordance with London Plan policies, the draft Brent Local Plan resists piecemeal development that would prejudice the delivery of comprehensive regeneration. It also seeks an increase in industrial floorspace through intensification and co-location.

6.4.5. Based on the existing industrial land portfolio profile that must be protected from competing uses, this Masterplan SPD seeks to ensure that an uplift in the quantity and quality of industrial use floorspace. The proposed West London Orbital (WLO) line also presents opportunities that will address strategic issues. It will provide orbital connectivity, bring land into use for housing and employment, and deliver transport benefits and infrastructure to meet future growth.

DP1 Recommendations:

- Development should support intensification of building floorspace to reflect the high levels of public transport accessibility;
- Mixed-use development on industrial land should be delivered through co-location;
- Development must respond to the scale, form, character and pattern of the townscape;
- Development should provide a major boost to business and employment opportunities, including those for no or low skilled demographics;
- Development should provide well-connected and accessible routes to, through and within all sites for pedestrians and cyclists;
- Development should provide community and other local facilities, services and amenities;
- Development should support the provision of new public transport and active travel infrastructure;
- Development should integrate public open space, public realm and recreation;
- Development proposals should incorporate sustainable design and construction methods, and demonstrate how buildings and landscapes will mitigate and adapt to climate change throughout their intended lifetimes.

DP2: Local neighbourhood parades

6.4.6. London Plan Policy SD6 Town centres and high streets and draft Brent Local Plan Policy BE4 Supporting Strong Centres requires the promotion and enhancement of the borough's town centres. The Council is seeking to strengthen the retail function of designated town centres by pursuing positive planning policies that direct the delivery of town centre uses towards them and prevents over-concentrations of particular uses. Any such floorspace delivered outside of these areas should only serve to meet a local needs, with proposals over 5,400sqm required to submit an Impact Assessment. As such, outside of town centres, draft Brent Local Plan Policy BE6 Neighbourhood Parades and Isolated Shop Units promotes parades and shops that provide convenient access to goods. These will comprise predominantly small-scale independent traders of local convenience shops and services, which are needed on a day-to-day basis.

6.4.7. This Masterplan SPD supports the creation of a neighbourhood parade along Neasden Lane to serve local needs. The neighbourhood parade should link to the nearby town centres at Neasden and Church End via a high quality public realm that incorporates safe and accessible walking and cycling routes.

DP2 Recommendations:

- Development should provide a quantum of Class E floorspace that does not unacceptably impact the vitality and viability of the nearby Neasden and Church End town centres;
- Development should support the provision of local retail and service units, particularly along Neasden Lane;
- Development should link the new neighbourhood parade along Neasden Lane with nearby town centres via new or improved active travel infrastructure;
- Development should maximise and maintain an active frontage for commercial uses;
- Development should support the meanwhile use of vacant buildings or land for socially beneficial purposes until occupied by the intended use.

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DP3: Local employment and affordability

6.4.8. The Draft Brent Local Plan sets out to secure workspace in growth areas that will contribute to creating vibrant places where people want to live. Draft Brent Local Plan Policy BE1 supports the local economy by requiring that 10% of the total floorspace within major developments above 3,000sqm be provided as affordable workspace. This can be in the form of research and development, light industrial and studio workspace, and is to be provided on-site for the lifetime of the development and managed by an approved provider.

6.4.9. Similarly Draft Brent Local Plan Policy BE2 states that the redevelopment of LSIS within NSGA should re-provide and increase industrial capacity by requiring that 10% of all employment floorspace be provided as affordable workspace.

6.4.10. Off-site provision may be acceptable, but only in exceptional circumstances where it can be robustly justified and the Council deems that on-site provision is not appropriate. In that event, either a financial contribution as cash in lieu, a smaller quantum of affordable workspace at a discount higher than 50% of market rate or a fully fitted-out workspace could be proposed.

6.4.11. Due to their proximity to Neasden station and the proposed WLO line, the McGovern Yard and Dephna House sites (Site 1 and Site 5) are ideal for incubators, accelerators and co-working spaces (IACs), provided they specialise in and focus on a specific sector or demographic. Both The Grange (an employment site in close proximity to NSGA) and 60 Neasden Lane (a site within NSGA) have worked with the Council to provide flexible office space that responds to local needs.

6.4.12. Based on engagement with 49 workspace operators varying in scale and type, an affordable workspace at a minimum area of 465sqm is required to deliver an attractive offer for an operator. The developer is recommended to engage with the approved operators at pre-planning stages in order to understand the design requirements and appropriate size for each workspace typology. The Council is currently working on an Affordable Workspace SPD that will provide more supporting details.

Based on the current local offer and engagement with operators, the following sectors are specified for NSGA:

- Creative, Digital, Financial and professional/knowledge economy;
- Artists;
- Food Preparation and Consumption; and
- Manufacturing (High Tech, Food, Construction, Wholesale).

DP3 Recommendations:

- Development should maximise the re-provision of the existing amount of industrial floorspace in LSIS (see **Section 6.3** for a site by site breakdown);
- Development in LSIS should provide 10% of industrial floorspace as affordable workspace.
- Major developments on other sites that exceed 3,000sqm should provide a minimum of 10% of industrial floorspace as affordable workspace;
- Development should strengthen the local neighbourhood parade as a commercial centre with incubator/accelerator/co-working space for small businesses.

DP4: New and affordable homes

6.4.13. The number of homes required to meet Brent’s affordable housing needs is significant, and the indicative capacity of NSGA determined by the masterplan capacity studies suggests that over 2,000 new homes could be accommodated. Details of the indicative capacity of each site is set out in Section 6.3. London Plan Policy H4 Affordable Housing and draft Brent Local Plan Policy BH5 state that the strategic target is for 50% of all new homes to be delivered across London to be affordable, and specific measures to achieve this aim include London Plan Policy H5 Threshold approach to applications.

6.4.14. If major development proposals that trigger affordable housing requirements do not comply with the policy requirements of 50% affordable where less industrial floorspace is proposed than existing or 35% affordable elsewhere (with a tenure split of 70% social and 30% low cost homeownership, then a financial viability assessment will be required to be independently assessed and appropriate financial viability reviews secured.

DP4 Recommendations:

- Development should deliver at least 2,000 new and affordable homes and carefully consider the indicative capacity for each site set out in **Section 6.3**;
- Development should create mixed, balanced and tenure blind communities that meet identified needs set out in the draft Brent Local Plan housing policies:
- A minimum of 35%, and ideally 50%, of new homes to be affordable (Policy BH5);
- Housing mix to be 25% as family-sized dwellings (Policy B6);
- Schemes of 500 dwellings or more to provide Build to Rent properties (Policy BH3);
- Provision of specialist older person housing to be considered (Policy BH8).

DP5: Recreational needs

6.4.15. Accessible sports facilities are required in Brent and London, to meet the community’s needs, increase sports participation and improve the overall health and fitness of residents. These spaces need to be able to facilitate multiple uses and be of a useable size to provide both formal and informal recreation. London Plan Policy S5 Sports and recreation facilities suggests that such facilities should be in accessible locations, well-connected to public transport, and linked to walking and cycling networks. Given the scope of NSGA, it is anticipated that new developments, where viable, can improve the accessibility, provision and quality of these facilities.

6.4.16. There should be adequate play space for both existing residents and for the intended capacity of the area. Dudden Hill currently falls below formal/equipped play space quantity standards. To meet the ‘Shaping Neighbourhoods Play and Informal Recreation SPG’ benchmark standard, 10sqm of dedicated play space per additional child, as a result of new development, is required.

6.4.17. Draft Brent Local Plan Policy BH13 Residential Amenity Space sets out its conditions for all new dwellings to have external private amenity space of sufficient size and type to satisfy its proposed residents’ needs. This is normally expected to be 20sqm per flat and 50sqm for family housing (3 bedrooms or more) located at ground floor.

DP5 Recommendations:

- Development on Site 3: CNWL should provide new or retain existing indoor and outdoor sport facilities including MUGAs/outdoor gym;
- Development should provide a suitable level of private amenity space consistent with draft Brent Local Plan Policy BH13;
- Development should support the provision of a series of pocket parks that provide formal and informal recreation (see **Section 6.3**).

DP6: Social infrastructure and community needs

6.4.18. Given the increase in population growth within the area, infrastructure needs will also increase. These needs must be met through incorporating infrastructure within new development, ideally co-located with other social infrastructure. London Plan Policy S1 Developing London’s social infrastructure and draft Brent Local Plan Policy BSI1 Social infrastructure and community facilities support development proposals that can provide high quality, inclusive social infrastructure at an accessible location. This includes health provision, education, community, play, youth, early years, recreation, sports, faith, criminal justice and emergency facilities.

6.4.19. **Community facilities:** Draft Brent Local Plan Policy BSI1 requires facilities that serve the local community to be easily accessible. These should be provided in flexible and adaptable buildings and ideally co-located with other social infrastructure uses. To maximise wider community benefits, a formal Community Use Agreement (CUA) can secure dual use. Brent’s Core Strategy states this requirement of new multi-functional community facilities to be provided at a rate of 370sqm per 1,000 new population.

6.4.20. **Health:** Consistent with London Plan Policy S2 Health and social care facilities, engagement with the NHS and HUDU was undertaken to inform long-term need. Based on the phasing of development within the growth area, and the associated population growth, HUDU has advised that 85% of the need will be generated by Phase 1, with no likely increases through Phase 2 and Phase 3. This may need to be accommodated through works to increase capacity at the existing Chalkhill Health Centre. It also reflects a desire within the NHS to make better use of its existing infrastructure, including expansion and general upgrades. HUDU has also indicated a desire to co-locate health and wellbeing infrastructure with other social infrastructure in line with London Plan Policy S1 Developing London’s social infrastructure. This will improve accessibility and facilitate a greater range of healthcare services and/or specialisms on fewer sites to meet demand in high-density urban areas. Developers can contribute to various types of provision such as acute healthcare, intermediate healthcare, and GP and primary care services.

6.4.21. **Education:** London Plan Policy S3 Education and childcare facilities suggests that there should be a sufficient supply of good quality education and childcare facilities to meet demand and offer educational choice. The assessment of existing facilities shows there is enough capacity in the area capable of absorbing demands generated from housing development at NSGA in the period to 2041.

6.4.22. In all cases of social infrastructure and community facilities, it is important to consider how this integrates with other facilities and how people who live or work in the area want to access it. Facilities that are either shared or co-located are an effective way to use land more efficiently. Examples of this include:

- Schools opening their facilities out of hours for use by the community;
- Co-location of health and sports facilities; or
- Co-location of facilities with housing to ensure effective usage.

6.4.23. Although provision is not currently required, a reserve sites has been identified within the CNWL site (Site 3) for the provision of a neighbourhood centre that supports such uses, should a need arise in the future. The Council will continue to liaise with the relevant stakeholders regarding education, healthcare and community needs.

DP6 Recommendations:

- Development should support the provision of new multi-functional community facilities at a rate of 370sqm per 1,000 new population (see Section 6.3);
- Development within Site 3 must provide a neighbourhood centre to accommodate the co-location of social infrastructure and community uses;
- Development should contribute towards the reconfiguration, upgrade and expansion of clinical space in existing facilities within the borough, secured by the Council through planning obligations;
- Development should support safe and sustainable access to existing schools, surgeries and community facilities outside NSGA.

DP7: Movement and accessibility

6.4.24. London Plan Policy T3 Transport capacity, connectivity and safeguarding requires that development plans and development decisions ensure the provision of sufficient and suitably-located land for public transport and active travel networks to serve London’s needs. It also suggests safeguarding existing land and buildings. Given the projected increase in public transport usage due to population increase and footfall in NSGA, it is essential that development proposals contribute towards the proposed WLO line.

6.4.25. Regional and local policies also encourage active travel. Improved public realm and integrated walking and cycling routes will not only increase permeability and a sense of place, but also provide health benefits. This is reflected in the London Plan Policy T2 Healthy streets where a modal shift to active travel should be encouraged in new development. The Mayor’s Transport Strategy (MTS), Healthy Streets principles, Brent’s Cycle Strategy 2016-2021, London Plan Policy T5 Cycling and draft Brent Local Plan Policy BT1 Sustainable Travel Choice all suggest that development, as a whole, should facilitate walking and cycling through the provision of safe cycle routes, secure storage within buildings and cycle parking within the public realm.

DP7 Recommendations:

- Development should ensure the safeguarding of sufficient land for the proposed new WLO line station, including an allowance for suitable access arrangements and interchange with the existing Neasden station;
- Development should be underpinned by a robust Transport Assessment and Travel Plans, setting out how transport impacts will be appropriately mitigated or managed;
- Development should prioritise active, efficient and sustainable transport choices, with a particular emphasis on improving conditions for pedestrians and cyclists. Key priorities include:
 1. Improving pedestrian and cycle connectivity to and across NSGA, particularly between the existing Neasden station, the proposed WLO line station, and local town centres and open spaces;
 2. Creating new east-west and north-south routes through the growth area;
 3. Facilitating improvements to existing links across the North Circular Road and establishing a new link across the railway to St. Raphael’s Estate (see Section 6.3); and
 4. Providing high quality, safe, secure cycle parking and storage facilities, both within buildings and on street;
- Development should reduce travel by private car, with sites with good public transport access expected to be car-free or car-lite. As a minimum, developments will need to comply with draft Brent Local Plan parking standards, as set out in Policy BT2;
- Development should contribute to making the area safer, greener and more inclusive by adopting a ‘Vision Zero’ and ‘Healthy Streets’ approach, as set out in the Mayor’s Transport Strategy. A particular priority is bringing about improvements to Neasden Lane with the aim of creating a healthier, more resilient and welcoming environment;
- Development should be informed by Delivery and Servicing Plans that balance the need to provide adequate access and servicing arrangements for industrial/commercial uses whilst protecting residential amenity.

DP8: Safety, security and active frontage

6.4.26. As set out in London Plan Policy D1, it is necessary to consider safety and security, overlooking, overshadowing and the placement of buildings to support crime prevention as part of the design process. Development will need to conform to the standards of Secured by Design (SBD) and Approved Document Q of the Building Regulations 2010. This will create safe environments that people want to occupy and use, creating a strong and positive sense of communal identity.

6.4.27. Principle 3.2 in the **Brent Design Guide SPD1** states that new developments should provide an animated façade and active frontage. Where limited areas of inactive frontage are unavoidable, active frontage should be prioritised along primary routes, public spaces and walking and cycling routes, with opposing inactive frontages avoided. Any inactive frontage (including ventilation and extraction grilles) must be treated with high quality detailing and materials.

DP8 recommendation:

- Development should provide and maintain active frontage at ground floor to Neasden Lane, Denzil Road, Dudden Hill Lane, and other public or shared outdoor spaces;
- Development should promote multi-user routes that are well-lit and well overlooked;
- Commercial uses at ground floor must maintain an animated façade, with transparent windows that allow sight into units and the internal activity, rather than a blank façade.

6.5 ENVIRONMENT AND SUSTAINABILITY PRINCIPLES

6.5.1. In Brent, 35% of CO2 emissions come from commercial or industrial buildings, 22% from road transport and 43% from homes. Therefore sustainable design and construction is of significant importance across the borough. Everyone who lives, works and studies within Brent will need to contribute to this transformation through carbon reduction, energy efficiency, waste reduction, air quality, sustainable urban drainage, biodiversity and tree planting (amongst other things).

6.5.2. The Council’s sustainable infrastructure policies DMP1 Development Management, Policy BSUI1 Creating a Resilient and Efficient Brent, Policy BSUI2 Air Quality, BSUI3 Managing Flood Risk and Policy BSUI4 On-site Water Management and Surface Water Attenuation all require new development to make a significant effort to reduce our contribution to climate change. The key components that should shape the development proposals are:

- Integrating mitigation to poor air quality;
- Designing out pollution and nuisance;
- Ensure that development is safe from flooding, and will not exacerbate flood risk;
- Reducing energy consumption through good design;
- Integrating low carbon energy technology and renewable energy;
- Promote water efficiency and management;
- Improving biodiversity and enhancing the natural environment; and
- Minimise waste and landfill.

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6.5.3. To ensure that Neasden is fully equipped to face the challenges and seize the opportunities of the future, these environment and sustainability principles set out how development at NSGA will need to perform to tackle the climate and ecological emergency, and achieve net-zero carbon.

- **ESP1: Resilient and efficient development**
- **ESP2: Air quality**
- **ESP3: Noise and other nuisances**
- **SP4: Ecology, arboriculture and urban greening**
- **ESP5: Ground conditions**
- **ESP6: Water management**
- **ESP7: Open space and amenity**
- **ESP8: Flood risk**
- **ESP9: Waste management**
- **ESP10: Energy**

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ESP1: Resilient and efficient development

6.5.4. Both residential and non-residential buildings are significant contributors to the carbon emissions produced in Brent. Buildings will need to become more energy efficient and be powered and heated by renewable energy sources. They will also need to employ innovative design methods to ensure they can cope with the changing climate. The built environment and public realm generally, whether it is considering streetlights, pavements, highways etc. should also consider the optimum sustainability considerations in terms of a scheme’s impact on the environment.

6.5.5. At the planning application stage, applicants are required to submit a Sustainability Statement for major developments, which demonstrates at the design stage how buildings and landscapes will mitigate and adapt to climate change over their intended lifetime through sustainable design and construction methods. The statement must demonstrate that the scheme has incorporated the advice set out in the Mayor’s Sustainable Design and Construction SPG, as well as any subsequent guidance, and meets the requirements of London Plan planning policy.

6.5.6. All residential development should target the Home Quality Mark (HQM), and achieve a minimum 3 star rating, to give future residents confidence that their homes are well-built and cost effective to operate and maintain. Brent has the fourth highest level of fuel poverty in London (approximately 16,000 households), so new development will need to carefully consider, in accordance with the HQM, the overall running costs of homes, their impact on residents’ health and wellbeing, their environmental footprint, their resilience to flooding and overheating, and their digital connectivity and performance. Compliance with the HQM will need to be independently evaluated by a licenced Building Research Establishment (BRE) Global Assessor and demonstrated prior to occupation.

6.5.7. All major non-residential development will need to achieve a BREEAM Excellent rating, ensuring best practice standards for its environmental performance through design, specification, construction and operation. Assessment and certification takes place in two stages. An interim certificate from the design stage assessment is required by the Council once planning permission has been granted, and before construction has commenced. A final certificate from the post-construction assessment is required by the Council prior to occupation. Developers are also encouraged to follow the BREEAM In-Use scheme which allows an action plan to be produced to improve the management and performance both of buildings in use and of client activities within the completed building.

6.5.8. The London Plan also requires comprehensive monitoring of energy demand and carbon emissions to ensure that planning commitments are

being delivered. Major developments are required to monitor and report on energy performance by displaying a Display Energy Certificate (DEC) and reporting to the Mayor for at least five years via an online portal. This enables the GLA to identify good practice and report on the operational performance of new development in London.

ESP1 Recommendations:

- Development for major sites should submit a Sustainability Statement stating how design and construction will mitigate and adapt to climate change over its lifetime;
- Developers should target the Home Quality Mark (minimum 3 star rating) for residential development;
- Developers should achieve a BREEAM Excellent rating for non-residential development;
- Developers are required to monitor and report on operational performance for at least 5 years to the GLA;
- Development for minor sites will need to submit and incorporate sustainability measures in the Design and Access Statement.

ESP2: Air quality

6.5.9. Given the site’s location, the Council identifies it as an Air Quality Management Area. Draft Brent Local Plan Policy BSUI2 Air Quality requires developments to be air quality positive as it is within a Growth Area. As such, applicants need to consider air quality as part of the design. This can be achieved by reducing emissions from design through implementation, reducing exposures through design features and maximising measures that benefit the local air quality. To support this, developments will be required to submit an Air Quality Assessment (AQA) and meeting the benchmarks in the Mayor’s Sustainable Design & Construction SPG.

6.5.10. Mitigation measures that will ensure that future residents of the site are not at unacceptable risk from air pollution can include:

- Triple glazing;
- Mechanical ventilation;
- Designing the layout of the site with generous street widths so that pollution does not get trapped in narrow spaces between tall buildings;
- Avoiding single aspect units; and

- Increasing green cover on-site such as tree planting, green roofs, green walls.

ESP2 Recommendations:

- Development must be air quality positive;
- Development should adopt mitigation measures to minimise exposure to existing poor air quality;
- Development should not be designed with windows solely facing onto busy roads such as Neasden Lane and Dudden Hill Lane, or onto the railway lines.

ESP3: Noise and other nuisances

6.5.11. There will be high noise levels, vibration and dust from road traffic and railway on developments closer to the railway tracks. London Plan Policy D13 Agent of Change requires new developments to be designed to ensure that existing noise and other surrounding nuisance-generating uses remain viable. They should continue or grow without unreasonable restrictions being placed on them.

6.5.12. To ensure the potential activities within the industrial location are not compromised, applicants need to submit a Noise Assessment and take account of mitigation methods in a sensitive manner. Several measures would need to be considered to ensure acoustic, and other environmental mitigations such as odours, dust and vibration between the industrial uses, railway lines and residential uses are mitigated in line with London Plan Policy D13 Agent of change principles, Policy D14 Noise and draft Brent Local Plan Policy DMP1 Development management.

ESP3 Recommendations:

- Development should incorporate noise-reducing features;
- Development facing railway lines should have triple glazed windows and acoustic screening in courtyard amenity spaces. Additional noise-reducing features should be incorporated, given that glazing is only useful when windows are closed;
- Development on sites affected by noise, such as from railway lines, busy roads and industrial uses, must be supported by a formal acoustic study or Noise Assessment at application stage to explain how the noise impact has been mitigated.

ESP4: Ecology, arboriculture and urban greening

6.5.13. The quantum of existing green spaces is very low and mostly comprises a variety of residential private and communal gardens, railway line-side land, small pocket parks and incidental green space. This also includes SINC and wildlife corridors along the railway lines. As such, there are opportunities for providing better quality and effective greening. London Plan Policy G6 Biodiversity and Access to Nature requires that new development makes a positive contribution to biodiversity, improves access to nature, and enhances its recreational function, which are all essential contributing factors to a community’s health and wellbeing.

6.5.14. London Plan Policy G1 Green infrastructure also recognises that a network of green spaces such as street trees, green roofs and other assets such as natural or semi-natural drainage features should be planned, designed and managed in an integrated manner. Development proposals must both contribute to and integrate with the existing network of green infrastructure in the area. Draft Brent Local Plan Policy BGI1 Green and Blue Infrastructure in Brent requires that development proposals achieve a net gain in biodiversity.

6.5.15. Draft Brent Local Plan Policy BGI2 Trees and Woodlands sets out development requirements for existing trees. Where there are existing trees on a site, applications for major developments require that an ecological survey be undertaken early to assess the impact on biodiversity. A Tree Survey will also be required as part of applications for major developments, with trees retained where possible and any losses mitigated by replacement equivalent tree canopies or off-site financial contributions. Best practice recommendations and guidance are set out in the British Standards for Biodiversity, through the ‘Avoid-Mitigate-Compensate’ technique and ‘Right Tree for a Changing Climate’ approach.

6.5.16. The protection and enhancement of trees and green spaces, and their associated ecological value on a development site can help developers meet the London Plan Policy G5 Urban greening criteria. Applications need to identify the appropriate amount of urban greening in new developments at an early stage. Draft Brent Local Plan Policy BGI1 and Policy G5 recommend a 0.4 target score for residential uses and 0.3 target score for commercial uses. Proposals should be accompanied by landscape plans that display the score table and show that the applicant has incorporated green cover into the design. This will lead to better quality green cover and add to achieving acceptable urban greening standards.

ESP4 Recommendations:

- Development must meet the required Urban Greening Factor;
- Development on sites adjacent to designated wildlife corridors must ensure these are enhanced, protected and maintained;
- Development on major sites must be supported by an Ecological Impact Assessment at application stage, which assesses the existing ecological features and sets out appropriate mitigation measures. New areas of habitat should assist in creating links to aid the movement of local wildlife across all sites;
- Development should retain existing trees, where practical, and increase tree planting where possible. Any loss of existing trees should be offset by appropriate mitigation measures;
- Development or a change of land use that has an unavoidable impact on wildlife should make financial contributions towards biodiversity offset measures or create replacement habitats.

ESP5: Ground conditions

6.5.17. Based on the current and historic industrial uses within NSGA, there is also a risk of land contamination. As such, site contamination and ground condition surveys in the form of a Preliminary Risk Assessment will be required. Recommendations that result in necessary remediation should be followed before any works are commenced on site.

ESP5 Recommendations:

- Development on sites that have historically been used for industrial purposes should be supported by a risk assessment that informs design proposals and sets out the necessary remediation measures.

ESP6: Water management

6.5.18. Future proposals for development within NSGA will need to consider the connection to utility infrastructure at the earliest stage of an application. All development proposals will need to be informed by discussions with utility providers to ensure that links to a proposed development can be made to provide water and sewerage. This should inform the Water Efficiency Assessment and Drainage Strategy.

6.5.19. Any required sewer network upgrades should be undertaken before or in line with the development to ensure that the water quality is protected. The draft Brent Local Plan requires that residential development meet the target water consumption of 105 litres per day per head (excluding the 5 litre external water allowance). It is also suggested that water management measures are actively incorporated such as smart metering, water-saving and greywater recycling, and retrofitting.

6.5.20. The implementation of sustainable water management through sustainable drainage systems (SUDS) and rainwater harvesting has become common practice. It reduces the amount of surface water entering the wastewater drainage system. SUDS are required by London Plan Policy SL13 Sustainable drainage and draft Brent Local Plan BSUI4 On-Site Water Management and Surface Water Attenuation in the use and management of water within the built environment. Applicants should refer to relevant guidance, such as The SUDS Manual 2015 CIRIA and SUDS in London: A Guide.

ESP6 Recommendations:

- Development must incorporate water management methods, such as sustainable drainage systems (SUDS), smart metering, water-saving and greywater recycling, and retrofitting;
- Development must be supported by a Water Efficiency Assessment and Drainage Strategy at application stage;
- Development must demonstrate sufficient water supply and wastewater disposal capacity to minimise the impact on existing infrastructure;
- Development must ensure the separation of surface and foul water systems.

ESP7: Open space and amenity

6.5.21. NSGA falls within an area of open space deficiency. Although other forms of open space nearby can supplement this deficiency, their accessibility and quality will be a significant factor in determining their usage. Given the substantial increase in residential uses within this already heavily urbanised area, new open spaces will be needed within NSGA itself.

6.5.22. Moving from the centre of the growth area outwards, the requirement for open space should form a key part of its comprehensive regeneration and incorporated cumulatively into design proposals for individual sites. New public open spaces, pocket parks, parklets, allotments and linear green spaces that enable wider access to existing open spaces nearby should be included.

6.5.23. London Plan Policy G4 Open Space and draft Brent Local Plan Policy BGI1 Green and Blue infrastructure in Brent promotes the creation of new areas of publicly accessible open space ensuring that future needs are planned for. It requires that development proposals not result in the loss of open space and create new provision, particularly where a deficiency has been recognised. Policy BGI1 requires open space to be appropriately designed to be accessible, safe, usable, and integrated into the development. It should enhance biodiversity, be integrated into the existing green infrastructure and include a suitable long-term management plan.

ESP7 Recommendations:

- Development should not result in a loss of public open space;
- Development should create new public open space to address the open space deficiency;
- Development on Site 3 should specifically provide a new and accessible open space, which includes the improvement, retention or reprovision of the existing open space on Dudden Hill Lane;
- Development on other sites should provide a series of pocket parks in accordance with the requirements set out in Section 6.3;
- Development on sites where public open space provision is not to be delivered on-site, should make financial contributions towards improving the quality and/or accessibility of existing open spaces.

ESP7: Flood risk

6.5.24. Development at NSGA offers an opportunity to address some of the noted sensitivities within the area, including surface water flooding and critical drainage. There are parts of the growth area that are at risk of surface water flooding (Flood Zone 3a). An increase in the rate of surface water run-off from new development may exacerbate the degree of risk downstream or within the surrounding community. Considering climate change of +25% and in line with London Plan Policy SI5 Water Infrastructure, SI12 Flood risk management, and D11 Safety, security and resilience to an emergency, mitigation measures will need to be given careful consideration.

6.5.25. Consistent with draft Brent Local Plan Policy DMP1 Development management, Policy BSUI3 Managing Flood Risk and Policy BSUI4 On-Site Water Management and Surface Water Attenuation, the drainage requirements of the site should be informed by a detailed Drainage and SUDS Strategy and a site Flood Risk Assessment.

6.5.26. Designated Critical Drainage Areas should assess flood risk due to surface water and sewerage water flooding. Drainage design must be carefully considered to handle heavy rainfall during storms while slowing the amount of water run-off not to cause flooding elsewhere.

ESP8 Recommendations:

- Development should be supported by a Flood Risk Assessment to assess the flood risk to and from sites within Flood Zone 2 or 3, or Designated Critical Drainage Areas;
- Development should develop a SUDS Strategy to manage the flow and rate of surface water entering drains and sewers through infiltration methods;
- Development on sites at risk of flooding should incorporate suitable design features, resilience and resistance measures to be part of the design to ensure that development can be safe for its lifetime. This should include, but not be limited to, the use of appropriate floor finishes, avoiding the construction of basements, and the implementation of robust evacuation plans.

ESP9: Waste management

Protected waste site

6.5.27. The two Neasden waste sites are protected under London Plan Policy SI9 Safeguarded Waste sites and the West London Waste Plan Policy WLWP 2 – Safeguarding and Protection of Existing and Allocated Waste Sites. To ensure no loss in existing capacity, the redevelopment of any existing waste management sites must ensure that the quantity of waste to be managed is equal to or greater than the quantity of waste for which the site is currently permitted to manage, or that the management of the waste is being moved up the waste hierarchy. Development for non-waste uses will only be considered on land in existing waste management use if compensatory and equal provision of capacity for waste, in scale and quality, is made elsewhere within the West London Boroughs.

Circular economy

6.5.28. The London Plan suggests that all scales of development should consider retention and refurbishment over demolition and rebuilding. New buildings should be designed to be adapted, reconstructed and deconstructed to extend their life, with materials reused or recycled. Evidence of an approach to circular economy measures should be provided at application stage, incorporating the principles within the GLA’s Circular Economic Statement Guidance (2020) to reduce, reuse, and recycle at the design, construction, and operation phases.

6.5.29. Policy D3 Optimising site capacity through the design-led approach, and SI7 Reducing waste and supporting the Circular Economy encourage a circular built environment. Policy D3 aims for high sustainability standards and takes into account the principles of the circular economy. Policy SI7 defines circular economy where there is a reduction of waste where materials are retained in use at their highest value for as long as possible and are then reused or recycled, leaving a minimum of residual waste and carbon footprint.

Managing local waste

6.5.30. Given the site’s profile with industrial uses and mixed-use development, the proposal will need to accommodate light industrial waste and household waste. Policy DMP1 Development Management recommends that a waste management plan should accompany major applications, with all residents provided with adequate internal and external refuse storage, and able to dispose of household waste conveniently. Design proposals should also give full consideration to the related requirements set out in the **Brent Design Guide SPD1**.

ESP9 Recommendations:

- Development that proposes the relocation of waste sites is supported where equal provision of capacity and strategic waste management outcomes are achieved;
- Development referable to the Mayor of London must submit a Circular Economic Statement at application stage;
- Development must be supported by a Site Waste Management Plan and Operation Waste Management Plan;
- Development on sites that delivers industrial intensification and residential co-location should carefully consider refuse storage and collection capacity.

ESP10: Energy

6.5.31. To meet the Council's ambitions for reducing the Brent's carbon footprint, all developers are encouraged to focus on building systems efficiency, low and zero-carbon technologies, and operation to ensure its longevity. These solutions should work in harmony with the building fabric and energy efficiency measures to provide a holistic approach.

6.5.32. London Plan Policy SI2 Minimising greenhouse gas emissions and its energy hierarchy 'Be Lean, Be Clean, Be Green and Be Seen', provide the overarching principles to inform the design, construction, and operation of new buildings. As such development referable to the Mayor should consider carbon reduction through the entire carbon lifecycle of a development from design to post-implementation. This should be reflected in a Whole Lifecycle Carbon Assessment. Consideration should be given to emissions from small appliances, raw material extraction, manufacture and transport, construction, maintenance, repair, dismantling or demolition, material disposal.

6.5.33. Based on the energy hierarchy, and to be supported by the submission of an Energy Strategy at application stage, Draft Brent Local Plan Policy BSU11 Creating a Resilient and Efficient Brent sets out the following:

- **Be Lean:** Major developments must assess how they will reduce energy demand. They should optimise building design by following the BREEAM standard of excellence and achieving a 35% improvement over baseline Building Regulations requirements;

Be Clean: Consider the efficient supply of energy through heat networks in major developments, which are required to connect to or contribute towards decentralised energy systems through Combined Heat and Power (CHP). The policy requires the establishment of district heating networks within NSGA. The energy centre location should facilitate low carbon technologies;

Be Green: All major developments should consider 100% on-site renewable energy sources and provide power generation opportunities such as solar PVs, solar thermal and heat pumps; and

Be Seen: Once occupied, major developments need to be verified by monitoring the building's performance using the GLA portal. This should be supported by the submission of an Energy Performance Report.

ESP10 Recommendations:

- Development must follow the energy hierarchy 'Be Lean, Be Clean, Be Green, Be Seen' to inform the design, construction and operation of new buildings and landscapes, and reduce carbon emissions;
- Development referable to the Mayor of London should undertake a Whole Lifecycle Carbon Assessment;
- Development on Site 3 should establish a district heating network that provides future connection to wider area. This should be proportionate in size to the number of homes, and commercial and industrial floorspace proposed. The energy centre location should facilitate low carbon technologies, be accessible and naturally ventilated;
- Development that achieves any shortfall against on-site reduction targets should make financial contributions as cash in lieu of the Carbon Offset Fund or support the implementation of projects that deliver carbon reductions.



7. DELIVERY

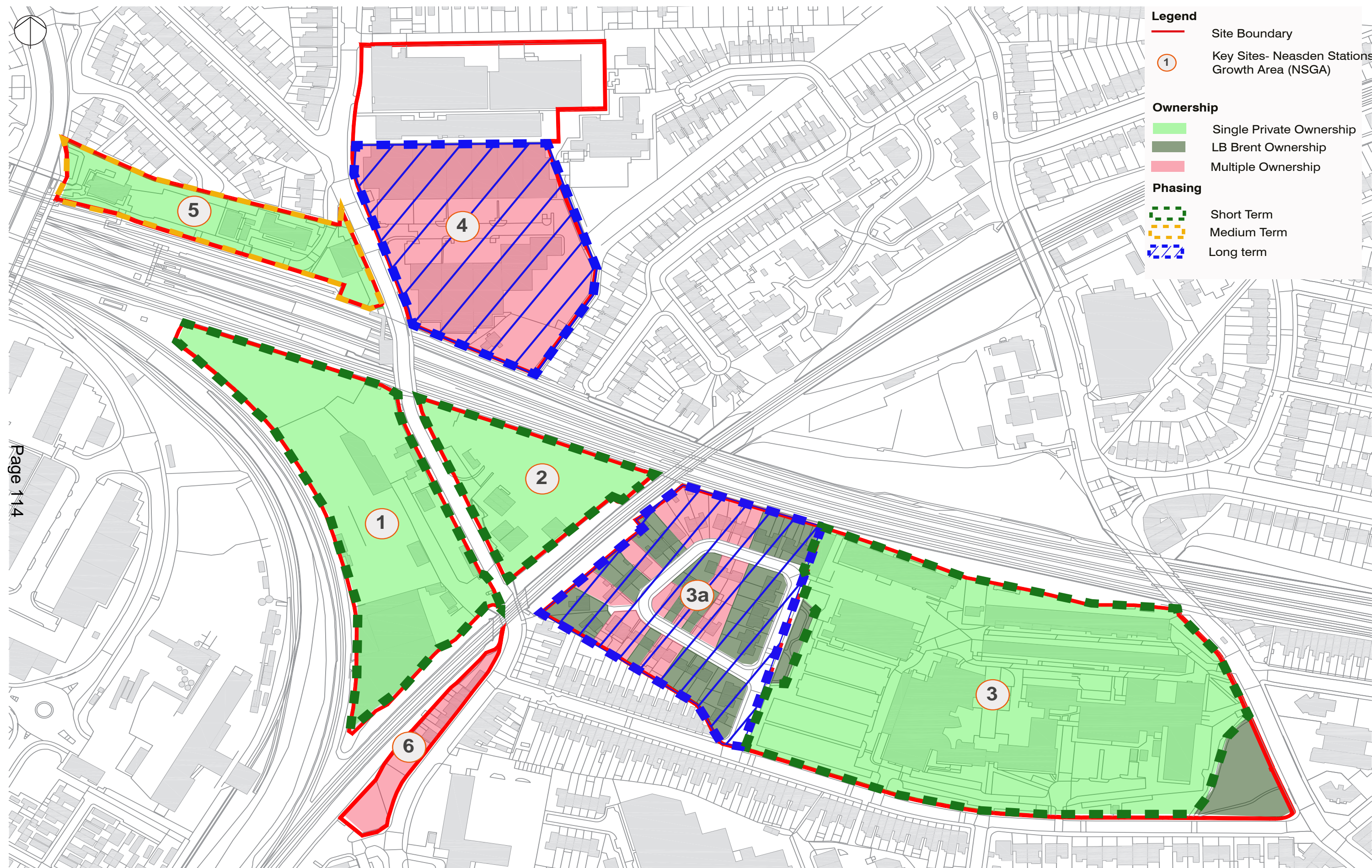


Figure 29: NSGA Land ownership and Phasing

7.1 VIABILITY

7.1.1. A financial viability assessment has informed the masterplanning of NSGA to ensure deliverable outcomes for the growth area and the individual site allocations. The assessment tested the range of masterplan capacity study options across the growth area and for each site. Appraisals indicate that there are viable options for the four sites that comprise the majority of the identified land area (equating to 8.39ha out of a total of 11.83ha, or 71%), and therefore demonstrate the development potential of the growth area.

7.1.2. Schemes were appraised with 50% and 35% affordable housing, and with re-provision of or increases in industrial floorspace levels, noting that where existing industrial floorspace is replaced, the London Plan requirement is for 35% affordable housing under the 'fast track' route. Development of the McGovern Yard and O'Hara sites was demonstrated to be viable at 35% affordable housing. Development of the CNWL site would likely be subject to a viability appraisal at application stage as the delivery of the required amount of affordable housing could be challenging. Similar challenges face the Falcon Park Industrial Estate site although meaningful growth in industrial rents, which might occur due to likely constraints on the supply of these types of premises in Brent, could allow for the fast track approach in the longer term.

7.1.3. Early development of the primary industrial sites at the heart of NSGA should result in a reasonable growth in sales values, supported by the effects of good placemaking. The redevelopment of the other sites within the growth area would consequently benefit from improved residual values in the medium to long-term, facilitating the delivery of higher percentages of affordable housing on these sites moving forward.

7.1.4. Site 3a and Site 5 both incorporate residential uses. For Site 3a, whilst many of the homes on Selbie Avenue and Severn Way are owned by the Council, the majority are owned by private individuals and would need to be purchased at market value. The Council has significant experience of estate regeneration incorporating its existing stock and those subject to right to buy. It has access to a wider range of financial incentives than would exist for private developers which could support delivery of a viable comprehensive scheme. Both sites are likely to come forward in the longer term.

7.2 LAND OWNERSHIP AND PHASING

7.2.1. Land ownership within NSGA is disparate, and the Council will need to ensure that the necessary social and physical infrastructure comes forward with new development to support the comprehensive regeneration of the growth area. Collaborative relationships between landowners and appropriate mechanisms, such as equalisation agreements, can facilitate the delivery of such comprehensive outcomes. The Council can also capture contributions and any necessary land from proposed developments to deliver the required infrastructure.

7.2.2. Whilst land ownership within NSGA is disparate, it is less fragmented than other regeneration and growth areas in the borough, and benefits from predominantly single ownership of developable sites in parts. Some sites are therefore likely to be brought forward for development sooner than others. On sites where there are many ownerships, a comprehensive redevelopment of the whole site must be considered, rather than a piecemeal approach to ensure the most effective and efficient use of land. **Figure 29** shows the land ownership and indicative phasing plan for NSGA.

7.3 DELIVERY AND MONITORING

7.3.1. To ensure this Masterplan SPD remains relevant over the Local Plan period, the Council will monitor and review the document to ensure that it remains relevant and in accordance with policies. Upon adoption, this Masterplan SPD will become part of Brent's suite of Local Plan documents. The progress of the document, in particular the development sites, will be monitored as part of the Annual Monitoring Report (AMR).

7.3.2. Notwithstanding these reviews, the guidance must be inherently flexible and capable of responding to changes in market demands and commercial and economic circumstances. This Masterplan SPD also provides information on measures that can be taken for future-proofing design in a changing climate and the vital transitioning to net-zero carbon. New development must embody the principles of sustainability and adapt to future changes. This is particularly relevant as the NSGA is planned to be delivered over the plan period and beyond.

7.4 LONG-TERM MAINTENANCE AND MANAGEMENT

7.4.1. The ongoing management and maintenance of public open space and SUDS is essential to ensuring that the comprehensive regeneration of NSGA creates a highly sought after and sustainable place to live. The whole life operation and maintenance of key public realm elements must be planned and costed for as part development proposals; these elements include, but are not limited to, planting, trees, verges, wildlife corridors, play facilities, sport pitches and residential streets.

7.4.2. It should not be assumed that the Council will automatically adopt the public open spaces provided as part of new development. Management and maintenance needs to be implemented by developers, with a long-term plan put in place that guarantees public access and is agreed with the Council through S106, planning conditions and other legal agreements. Any adoption of public open space by the Council will be subject to an agreement and appropriate commuted sum for ongoing maintenance being secured.

7.4.3. Consequently, a management board may also need to be established, which includes residents and council representatives. This would ensure that the high quality public open spaces delivered at the outset of a development's life are maintained over subsequent years and the longer term.

7.5 COMPULSORY PURCHASE ORDER

7.5.1. On some sites within the growth area, the wider masterplanning objectives may only be achieved through the Council's intervention or land assembly. This will enable the delivery of planned links between sites and help secure the necessary supporting infrastructure.

7.5.2. The Council will work closely with all stakeholders to ensure that the principles set out in this Masterplan SPD are appropriately satisfied without undermining the wider opportunities of NSGA over time. Where necessary, the Council will also consider the use of compulsory purchase order (CPO) powers to secure the proper phasing and delivery of development within the growth area.



8. ADDITIONAL DESIGN GUIDANCE

8.1 CASE STUDIES

Case Study 1: Caxton Works, East London

Location: Canning Town

Local authority: Newham Council

Mixed use co-location: 336 homes and light industrial uses

8.1.1. Caxton Works is the first completed co-location scheme in London and seeks to address the scarcity of affordable space in the city for small businesses, workshops and artists' studios. Designed by Studio Egret West for Galliard Homes and U+I, the scheme combines 336 homes with a range of flexible and affordable light industrial units.

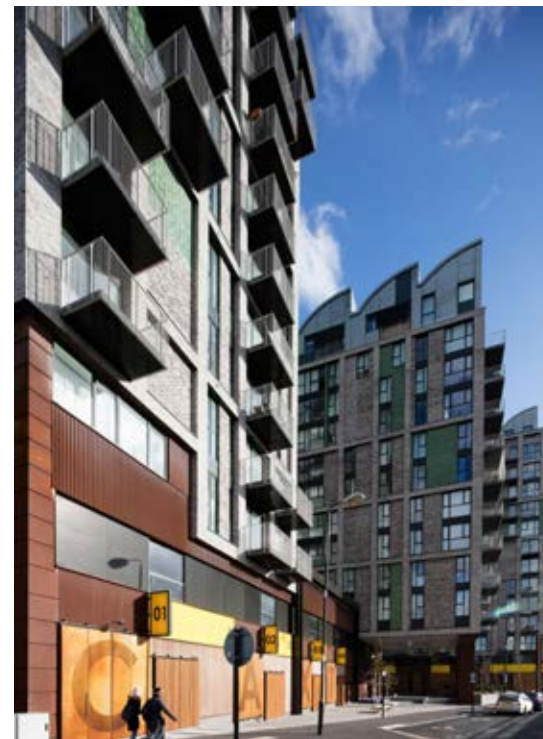
8.1.2. Residential units sit above the work units in a vertical co-location arrangement. Low-rise buildings help relate to the surrounding context, with four taller buildings rising to 15 storeys to allow for higher density. The scalloped roof profile of these taller buildings creates a distinctive skyline, giving the scheme a unique, but inherently industrial character and identity.

8.1.3. As part of the scheme, a historic street has been reinstated and characterised as a 'pedestrian first' working alley with areas for loading and unloading. It functions as a market-style, community-orientated street that gives the workshops a strong presence within the streetscape, whilst anchoring the different elements of the scheme together.

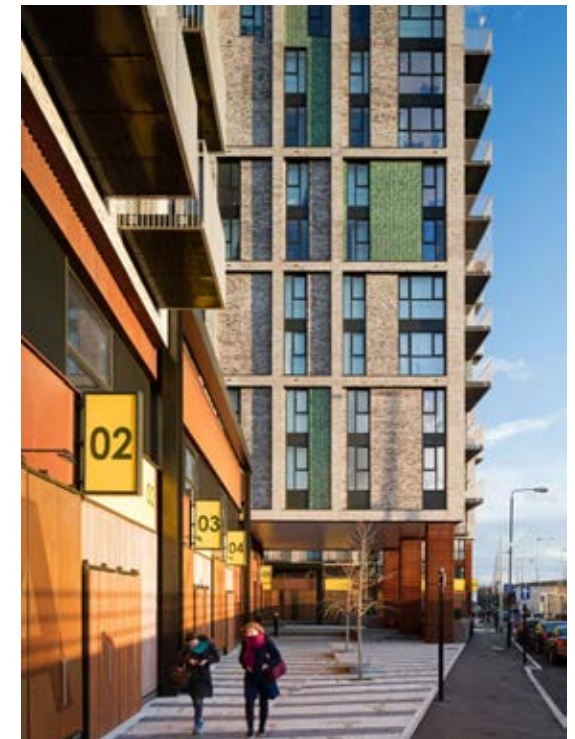
8.1.4. The work units have been designed to be inherently flexible, and in a range of different sizes, to allow businesses to grow and move into other units within the scheme. Commercial developer U+I wants businesses to put down roots, with opportunities for business growth within the scheme key to its long-term success.



Light industrial uses co-located with residential uses within tall towers



Architectural features and elevation create interesting street views



Well defined high quality public realm



Use of complementary high quality material palette that reflect the type of uses



Design and detailing add visual appeal

Case Study 2: Thameside West, London

Location: Silvertown

Local authority: Newham Council

Mixed use co-location: 401 homes, 3,500sqm light industrial uses

8.1.5. Thameside West is the first phase in the comprehensive regeneration of the former Carlsberg-Tetley Brewery site in Silvertown. Designed by John McAslan + Partners for Silvertown Homes Limited and Greater London Authority Land and Property, the scheme co-locates 401 homes above 3,500sqm of flexible light industrial units and seeks to unify these two uses into a healthy and connected community where people can live and make.

8.1.6. Two large double-height work units are stacked beneath a storey of internal and external communal amenity spaces at podium level, which act as a buffer for the residential uses above. They also elevate homes at the lower levels above the level of the adjacent DLR viaduct to ensure there is no overlooking from passing trains. A high density scheme, buildings rise to 21 storeys.

8.1.7. A shared service yard is incorporated into the footprint of the scheme, and flanked by the work units, allowing large vehicles to access dedicated loading bays within the units themselves. This removes the process of loading and unloading from the streetscape, creating a safer environment for pedestrians and cyclists and minimising noise and disruption to the homes above.

8.1.8. As part of a wider masterplan for the area, and similarly to NSGA, the Thameside West scheme will be supported by the development of new infrastructure including the construction of a new DLR station and the Silvertown Tunnel, alongside major improvements to walking and cycling. A new grid of streets will be laid out across the site and anchored by a new riverside park, bringing much-needed green infrastructure to this part of the city.



Plan showing the different phases of the development



Light industrial uses co-located with residential uses within tall towers



Articulated corner treatment and interface with viaduct add visual appeal

Case Study 3: Old Kent Road, London

Location: Murdock St / Ruby Street / Old Kent Road

Local authority: Southwark Council

Mixed use co-location: 4200 homes, industrial uses, work space, cafe and community use

8.1.9 The proposed regeneration scheme sits on a brownfield and under-utilised site and is a key component of the Old Kent Road Area Action Plan proposed by the London Borough of Southwark to deliver 4,200 homes and new public realm. It successfully co-locates residential uses in tall towers with workspace, cafes and community use on the ground floor.

8.1.10 The scheme shown in the adjacent images is designed by Maccreanor Lavington and comprises a range of urban blocks on Old Kent Road incorporating 628 new homes with retail, flexible workplace, industrial uses and café at the lower levels, and communal roof gardens and rooftop terraces. The proposal also includes the demolition of existing buildings and reprovisioning with an onsite community centre and a large church hall accommodating the Everlasting Arms Ministries, 2,538 sqm of industrial workspace (Use Classes B1c/B8) at the ground and intermediate levels; and an internal loading yard. The residential blocks range from 6 to 39 storeys above a 2/3 storey podium and other associated infrastructure.

8.1.11 The mixed-use residential buildings have been designed to reflect and respect the future context of the local area and observe the designation for tall buildings given to the site in the Old Kent Road Action plan. Planning permission has been granted, and the scheme is currently underway. The scheme carefully considers the streetscape with the buildings lowering the height along the primary frontage, and a range of densities animate the skyline. Provision for shared public open space with light industrial uses and workspace on the ground floor help activate the public realm. Use of materials, textures and fenestration help in creating a visual appeal and integrating within the urban fabric of Old Kent Road.



Light industrial uses co-located with residential uses within tall towers



Provision for public open space and spill out shared space



Building heights lowered along primary frontage to interface well with streetscape



Landmark towers helps animate the skyline

Case Study 4: River Road Employment Area/ Crossness Yard, London

Location: Southwest Barking, London

Local authority: Barking and Dagenham Council

Mixed use co-location: Residential, work space and community use

8.1.12. Located in southwest Barking, the River Road Employment Area is a large area of SIL, which is currently characterised by low-rise industrial buildings, poor quality public realm and limited public transport connections. BeFirst, the wholly owned development company of Barking & Dagenham Council, and Inland Homes commissioned Haworth Tompkins to develop a SPD that supports the area’s transformation into a vibrant new mixed-use neighbourhood.

8.1.13. The SPD categorises the area into three distinct zones for intensified industrial, co-location and residential, and corresponding character areas are defined based on geography and existing uses. Within the co-location zone a new mix of residential, industrial and commercial uses is proposed, supporting smaller scale and cleaner Class E type uses that sit more comfortably adjacent to housing. Similarly to NSGA, uses will be vertically co-located in multi-storey schemes to achieve no net-loss of floorspace and make the most efficient use of land.

8.1.14. A site within the co-location zone, at the junction of Thames Road and Crossness Road, is one of the first to come forward for redevelopment. Designed by BPTW, the scheme contains 156 affordable homes with a range of flexible light industrial units, and a café. Buildings are arranged around a central yard space onto which the work units face, with van-sized parking spaces for loading and unloading.

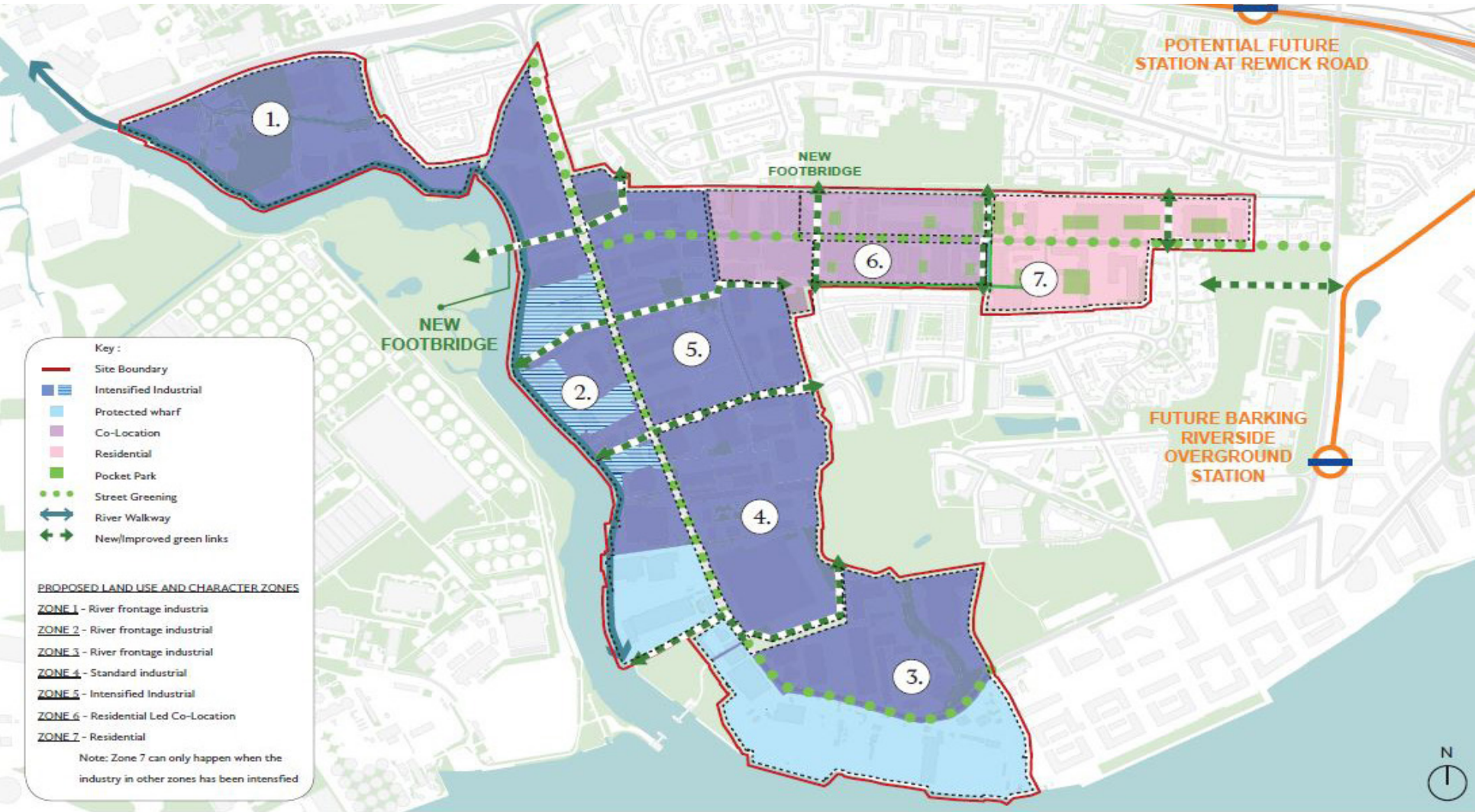
8.1.15. Large double-height work units at ground floor are stacked beneath smaller units, served by deck access. Residential units sit adjacent to these, defining the edges of communal amenity spaces at podium level. Buildings rise south to north from 7 storeys to 11 storeys and up to 17 storeys at the road junction. The scheme relates to the surrounding context, whilst establishing a new higher density scale for the co-location zone.



Industrial uses on the ground floor co-located with residential uses above



Corner treatment and material palette create visual appeal



Plan showing integration of industrial uses with residential co-location

9. PLANNING PROCESS

9.1 PRE- APPLICATIONS

9.1.1. The council encourages applicants to seek early engagement with officers from Development Management to discuss proposals for development at NSGA prior to the submission of a planning application, at the pre-application stage. This service helps to work with the Council colleagues across discipline and avoid the submission of unacceptable proposals.

9.1.2. It is recommended that the applicant considers the viability of a site at the pre-application stage, to allow any issues to be resolved before the submission of a formal planning application.

A step by step guide to planning process can be found at Council's website:

<https://www.brent.gov.uk/services-for-residents/planning-and-building-control/step-by-step-guide-to-the-planning-process/>

Further details on pre-application advice can be found at the Council's website:

<https://www.brent.gov.uk/services-for-residents/planning-and-building-control/before-you-make-a-planning-application/planning-pre-application-advice-service/>

9.2 PLANNING APPLICATIONS

9.2.1. A list of information to be submitted as part of an outline application for development proposals at NSGA are provided below. It should be noted that this list is not exhaustive and further requirements may be identified as a result of pre-application discussions. The list can be found at the Council's website:

<https://www.brent.gov.uk/services-for-residents/planning-and-building-control/what-you-will-need-when-submitting-a-planning-application/applications-for-full-planning-permission-or-technical-details-consent/>

9.3 PUBLIC AND STATUTORY CONSULTATION

9.3.1. The Town and Country Planning (Local Development) (England) Regulations 2012 sets out minimum standards for community engagement in the development of planning documents. It is the Council's responsibility to undertake this in accordance with the statutory regulations and objectives established in the Council's Statement for Community Involvement (SCI). The consultation can be for a minimum six-week period. This document can be found at the Council's website:

<https://www.brent.gov.uk/planning-policy/shaping-brent-s-future-together/>

9.3.2. The Town and Country Planning (Development Management Procedure) Order 2015 sets out guidance for consultation on planning applications. Planning applications submitted to the Council will be subject to a six week period of consultation.

9.4 REFERABLE TO MAYOR

9.4.1. An application is referable to the Mayor of London if it meets the criteria set out in the Mayor of London Order (2008). The Council is required to refer applications of potential strategic importance to the Mayor for his consideration.

The criteria includes:

- Development of 150 residential units or more; or
- Development over 30 metres in height (outside the City of London).

9.4.2. The Mayor has the power to direct refusal of a planning permission if he feels that consent would be contrary to the London Plan. The SPD has been drafted in accordance with the regional policies and the GLA have endorsed the Masterplan. The development will be supported that is in line with the strategic objectives and principles of the SPD.

9.5 DESIGN REVIEWS

9.5.1. Design Review is a popular method of improving the quality of new development by offering constructive, impartial and expert advice. Design Review Panel discussions allow local authorities, developers and Further information available at: <https://www.designcouncil.org.uk/what-we-do/programmes/built-environment/design-review>

The design teams to present their schemes at an earlier pre-planning stage to a panel of experts from the built environment sector. Design reviews are endorsed within Paragraph 129 of the NPPF and can be a material consideration when determining planning applications. As such, development at NSGA will be requested to come before the Brent Design Advice Panel (BDAP) to benefit from impartial discussion and constructive advice. The BDAP is managed on behalf of the Council by the Design Council.

9.6 CIL/S106 PLANNING OBLIGATIONS

9.6.1. The Council considers that the most appropriate mechanism to deliver the wider infrastructure associated with NSGA will be through the use of Community Infrastructure Levy (CIL) or via site specific S106 agreements. In addition, in order to ensure that infrastructure is provided in a coordinated and timely manner, another most effective method for delivering infrastructure will be through the use of planning conditions.

More details on CIL and S106 Planning Obligations can be viewed at the Council's website: <https://www.brent.gov.uk/planning-policy/community-infrastructure-levy-cil/>

9.7 CONTACT AND FURTHER GUIDANCE

The Planning Service

London Borough of Brent

Brent Civic Centre

Engineers Way, Wembley HA9 0FJ

Email: planningstrategy@brent.gov.uk

Website: <https://www.brent.gov.uk/planning>

Other Supplementary Planning Documents can be found here:

<https://www.brent.gov.uk/planning-policy/supplementary-planning-documents-and-guidance/>

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EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	Neasden Stations Growth Area Masterplan SPD
DEPARTMENT:	Regeneration & Environment
TEAM:	Regeneration
LEAD OFFICER:	Pratibha Bhatt
DATE:	19 th April 2021

NB: Please ensure you have read the accompanying EA guidance and instructions in full.

SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

In collaboration with the Greater London Authority (GLA), Brent Council are delivering a comprehensive Masterplan Supplementary Planning Document (SPD) for the Neasden Station Growth Area (NSGA) site allocation, as identified in the Brent draft Local Plan.

The new London Plan increases Brent's housing target and requires Brent proactively plan to intensify industrial capacity. The Mayor's Transport Strategy proposes the new West London Orbital (WLO) line to support 29,000 new homes across West London. The Mayor's Housing Strategy supports more intensive use of land, assembly and investment in (affordable) homes and infrastructure. Brent's draft Local Plan allocates Neasden Stations Growth Area (NSGA), which currently comprises locally significant industrial sites (LSIS) and includes employment, light industrial, storage, waste, residential, college, station/railway, and petrol station use. Mixed use regeneration of the NSGA site allocation will boost local housing supply, provide industrial capacity and deliver infrastructure to accommodate Brent's growing population.

Brent Council plans to facilitate an effective NSGA Masterplan and SPD to deliver at least 2,000 new and affordable homes, jobs, and supporting infrastructure for the NSGA through industrial intensification and residential co-location. The NSGA Masterplan SPD will promote a high-quality environment and foster a 'sense of place' for the NSGA, and bring forward physical, social and economic regeneration of NSGA and surrounding areas.

Objectives:

The NSGA Masterplan SPD objectives are as follows:

- Realise the ambitions for regeneration and growth set out in the draft Brent Local Plan and the new London Plan;
- Encourage more efficient land use through industrial intensification and residential co-location to increase industrial capacity and meet housing demand;
- Attract long-term investment into the growth area and provide certainty to investors;
- Create an exemplary and characterful place underpinned by robust development, placemaking and sustainability principles;

- Maximise the benefits of the proposed WLO line and support closer working between Transport for London (TfL), the West London Alliance (WLA) and other stakeholders to unlock the potential of key development sites;
- Promote active and sustainable travel modes and encourage the development of new infrastructure and the extension or enhancement of existing infrastructure;
- Enhance the public realm and create healthy streets for people to improve the quality of the local environment;
- Create a new network of green infrastructure and provide much-needed public open space accessible to existing and new communities alike;
- Overcome issues of severance between the growth area and its surroundings and establish links to adjacent development sites and town centres; and
- Support climate change resilience and encourage the adoption of zero carbon and circular economy principles.

2. Who may be affected by this policy or proposal?

The Neasden Stations Growth Area (NSGA) Masterplan SPD would affect various groups of people in the borough, including existing and future residents and communities, local landowners, developers, businesses, community groups and local councillors.

Affected parties will include:

- Local residents of the borough and surrounding boroughs
- Visitors to the borough / tourists
- Businesses / employers / employees
- Landowners / developers
- Service providers of social infrastructure, and their service users e.g. health and social care facilities, education and childcare facilities, sports and recreation facilities, play facilities, community facilities and community groups
- Providers of physical infrastructure e.g. TfL, Network Rail, Cadent / National Grid, Thames and Affinity Water
- Statutory agencies such as the Environment Agency, Natural England etc.
- Developers and registered providers of social / intermediate / affordable housing (e.g. housing associations)
- London Borough of Brent departments and staff, including Children and Young People, Safeguarding, Housing, Adult Social Care, Public Health, Customer & Digital Services (including Revenue and Debt), Environment Services, Regeneration, Growth & Employment
- Councillors / elected members

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

There is relevance to equality and the council's public sector equality duty as the principles and proposals in the NSGA Masterplan SPD will guide major regeneration and growth in the borough planned to be delivered over the next 20 years, and therefore should aim to remove or minimise disadvantages which are connected to characteristics of protected groups.

The NSGA Masterplan SPD plans to meet some of the affordable housing and employment needs of the borough, including the needs of protected groups through for example disabled and supported housing provision. The NSGA Masterplan also aims to secure an enhanced public realm that is safe, accessible and well connected, accessible public green open spaces for all user groups and further provisions for safe walking/cycling routes that will have positive impacts on all groups. Consistent with the three aims of the general equality duty, the NSGA Masterplan SPD aims to eliminate unlawful discrimination, advance equality of opportunity, and foster good relations between different groups.

The NSGA Masterplan SPD will guide comprehensive regeneration and long-term social, economic and environmental sustainability of NSGA as defined by the draft Brent Local Plan site allocation. The document sets out the planning policy context that underpins the vision and objectives for the NSGA, alongside a robust urban design framework that guides future urban developments in the area. The provision of employment spaces/affordable workspaces is expected to advance equality of opportunity, by giving those with less financial security the opportunity to access employment in the NSGA. To bring about comprehensive redevelopment in the area, partnerships are required between landowners and developers, the Council, and the existing and future communities. End users could potentially be from groups with protected characteristics. These partnerships also have the potential to facilitate collaboration between different community groups, and in realising the objectives of the NSGA Masterplan SPD foster good relations and create a sustainable and inclusive neighbourhood.

4. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age	X		
Sex		X	
Race		X	
Disability	X		
Sexual orientation		X	
Gender reassignment		X	
Religion or belief		X	
Pregnancy or maternity		X	
Marriage		X	

5. Please complete **each row** of the checklist with an "X".

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council's public sector equality duty?	X	
Does the policy or proposal relate to an area with known inequalities?		X
Would the policy or proposal change or remove services used by vulnerable groups of people?		X
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	X	
If you have answered YES to ANY of the above, then proceed to section B. If you have answered NO to ALL of the above, then proceed straight to section D.		

SECTION B – IMPACTS ANALYSIS

1. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

The NSGA Masterplan SPD has built on robust baseline analysis and followed engagement with all internal and external stakeholders identified in the project execution plan; GLA, TfL, WLA, technical project team, landowners and developers, ward councillors and lead member. Brent's draft Local Plan identifies the NSGA as one of 8 growth areas which will deliver the majority of the future housing and employment needs of the borough, and was extensively consulted upon and subject to its own equality impact assessment https://www.brent.gov.uk/media/16415876/core_gen_04-equalities-impact-assessment.pdf. The NSGA Masterplan SPD will be subject to a minimum of 6 weeks public consultation in summer 2021.

The NSGA Masterplan SPD is an opportunity for Brent Council to bring about the physical and socio-economic regeneration of not only NSGA, but also build positive relationships with surrounding neighbourhoods in Church End and the St Raphael's Estate. The NSGA Masterplan SPD conforms to both the draft Brent Local Plan and the new London Plan.

The following sources of information have been used to produce the baseline information as a Local Plan site allocation informing the NSGA Masterplan SPD and this equality analysis.

Population & Equality

- Draft Local Plan and evidence base, London Borough of Brent

Education

- Joint Strategic Needs Assessment (JSNA), 2015, London Borough of Brent
- Brent School Place Planning Strategy (June 2017 refresh), 2019-2024, London Borough of Brent
- Direct engagement with school admissions team

Health & Well-Being

- Direct engagement with NHS including HUDU assessment of future health needs.
- Impact assessment on existing facilities for sports, green space, infrastructure etc. and needs assessment for future provisions and improvements within NSGA.

Water

- Flood risk assessment (Metis survey)
- Flood Risk Management Strategy

Air Quality

- Air Quality Action Plan, 2017- 2022

Soils & Geology

- Contaminated Land Database, London Borough of Brent

Climate Change

- Climate Change Strategy and supporting evidence document, London Borough of Brent
- Draft Local Plan and evidence base, London Borough of Brent

Biodiversity

- Brent Review of Sites of Importance for Nature Conservation

Landscape and Townscape

- Tall Building Strategy, 2019, London Borough of Brent
- Open Space Study, 2019, London Borough of Brent

Waste

- Joint West London Waste Plan
- The new London Plan 2021, GLA

Transportation

- West London Orbital –Strategic Outline Business Case 2019
- Mayor's Transport Strategy 2018
- Brent Long Term Transport Strategy, 2015-2035, London Borough of Brent
- Brent Cycle Strategy, 2016-2021, London Borough of Brent
- Brent Walking Strategy, 2017-2022, London Borough of Brent

Noise

- London Noise Mapping Service – www.londonnoisemap.com

Local Economy

- Employment Land Demand Study, 2015, ORS
- West London Employment Land Evidence, May 2019
- Brent Workspace Study, 2017, Regeneris
- Brent Employment, Skill and Enterprise Strategy 2015-2020

Housing

- Strategic Housing Market Assessment (SHMA), 2018, ORS
- Brent Inclusive Growth Strategy Research Base, 2019, London Borough of Brent
- NSGA Viability Assessment 2020, BNP Paribas

2. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

AGE	
Details of impacts identified	<ul style="list-style-type: none"> • Meeting some of the borough's affordable housing and local employment needs is considered to have likely positive impacts on all community groups and ages, especially those with socio-economic disadvantaged backgrounds. • Provision for enhanced public realm and 'Healthy Streets', publically accessed green open spaces and an improved movement network and connectivity will have a positive impact on all groups and ages.
DISABILITY	

Details of impacts identified	<ul style="list-style-type: none"> Provisions for accessible housing which are DDA friendly and blue badge parking will be beneficial for beneficial to Disability groups. Disabled people might also expect to benefit from accessible WLO station (proposed) and improvements to the existing Neasden Station in terms of accessibility.
RACE	
Details of impacts identified	<ul style="list-style-type: none"> No obvious impacts upon groups with the protected characteristics of Race is identified in this equality analysis.
SEX	
Details of impacts identified	<ul style="list-style-type: none"> No obvious impacts upon groups with the protected characteristics of Sex is identified in this equality analysis.
SEXUAL ORIENTATION	
Details of impacts identified	<ul style="list-style-type: none"> No obvious impacts upon groups with the protected characteristics of Sexual Orientation is identified in this equality analysis.
PREGANCY AND MATERNITY	
Details of impacts identified	<ul style="list-style-type: none"> No obvious impacts upon groups with the protected characteristics of Sexual Orientation is identified in this equality analysis.
RELIGION OR BELIEF	
Details of impacts identified	<ul style="list-style-type: none"> No obvious impacts upon groups with the protected characteristics of Religion or Belief is identified in this equality analysis.
GENDER REASSIGNMENT	

Details of impacts identified	<ul style="list-style-type: none"> No obvious impacts upon groups with the protected characteristics of Gender Reassignment is identified in this equality analysis.
MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	<ul style="list-style-type: none"> No obvious impacts upon groups with the protected characteristics of Marriage & Civil Partnership is identified in this equality analysis.

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

No.

4. Were the participants in any engagement initiatives representative of the people who will be affected by your proposal and is further engagement required?

The NSGA Masterplan SPD has been developed over 2020 through ongoing consultation with a wide range of key stakeholders, with wider public participation limited by the coronavirus pandemic. The Council is committed to re-engaging the local community prior to the statutory public consultation process scheduled for summer 2021. A list of community groups are being identified for this process and will inform the outcomes of the NSGA Masterplan SPD. This equality analysis will be updated following further consultation.

5. Please detail any areas identified as requiring further data or detailed analysis.

N/A

6. If, following your action plan, negative impacts will or may remain, please explain how these can be justified?

No.

7. Outline how you will monitor the actual, ongoing impact of the policy or proposal?

To ensure the NSGA Masterplan SPD remains relevant over the Local Plan period, the Council will consider the need to review the document after 5 years. Notwithstanding this potential for review, the guidance must be sufficiently flexible and capable of responding to changes in market demands and commercial and economic circumstances. These are factors that can radically change in a short space of time. The NSGA Masterplan SPD also provides information on measures that can be taken for future-proofing design in a changing climate

and the vital transitioning to net-zero carbon. New development must embody the principles of sustainability and adapt to future changes, and this is particularly relevant as the NSGA is planned to be delivered over a period of approximately 15-20 years.

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

The strategic objectives of the NSGA Masterplan SPD are to delivery new homes, jobs and infrastructure and in so doing support good growth, uphold high quality placemaking standards, and ensure social, economic and physical regeneration brings forward transformational changes, contributing to a vibrant and inclusive neighbourhood. The NSGA Masterplan SPD will facilitate these objectives and help realise their ambitions for the benefit of the borough's residents, businesses and diverse communities. The NSGA Masterplan SPD aims to meet the housing and employment needs for Brent's communities, support local businesses and communities, and provide opportunities for placemaking. The NSGA Masterplan SPD will have positive impacts on existing and new communities alike, including different groups, as it identifies a range of placemaking, environment and sustainability principles which should apply to and guide comprehensive redevelopment of the area, as well as specific positive impacts for people of different age groups and people with disabilities.

SECTION D – RESULT

<i>Please select one of the following options. Mark with an "X".</i>		
A	CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED	X
B	JUSTIFY AND CONTINUE THE POLICY/PROPOSAL	
C	CHANGE / ADJUST THE POLICY/PROPOSAL	
D	STOP OR ABANDON THE POLICY/PROPOSAL	

SECTION E - ACTION PLAN


This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date
Statutory public consultation for a minimum of 6 weeks	Review of all comments received through consultation process	PB/SS	Summer 2021
Modification made following consultation and Equality Analysis updated	Integrate all comments and feedback	PB	Summer/Autumn 2021
Adoption of the NSGA Masterplan SPD	The NSGA Masterplan SPD will now apply, any development proposals must take into account and adhere to the principles set out and guidance provided.		Autumn/Winter 2021
Review periodically (every 5 years)	Monitor and review equalities impacts	PB	Sept 2021

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Pratibha Bhatt, Regeneration Masterplanner	09/04/2021
REVIEWING OFFICER:	Bryony Gibbs, Equality Officer	13/04/2021
HEAD OF SERVICE:	Jonathan Kay, Head of Regeneration	19/04/2021

	Cabinet 14 th June 2021
	Report from the Strategic Director of Customer and Digital Services
Brent Technology Roadmap Capital Investment	

Wards Affected:	All
Key or Non-Key Decision:	Key
Open or Part/Fully Exempt: <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Open
No. of Appendices:	One Appendix A - Brent Technical Roadmap Executive Summary
Background Papers:	None
Contact Officer(s): <small>(Name, Title, Contact Details)</small>	Sally Chin Head of ICT and Applications Support Tel: 020 8937 1432 sally.chin@brent.gov.uk

1.0. Purpose of the Report

- 1.1. In 2020/21 a planning exercise was undertaken to understand the future IT requirements for the Council over the next 5 years. This resulted in a 5 year Capital Investment programme and Technology Roadmap, covering the 2020-2025 period.
- 1.2. The resulting Technology roadmap is very comprehensive and included a breakdown across the 5 years, with each proposed scheme analysed with 3 options; the highest potential cost, the medium cost and the lowest cost. The highest cost includes a solution which would give a very high quality product and the lowest cost is the most basic/"functional" solution.
- 1.3. The summary results of the above detailed analysis is shown in Appendix 1, the Brent Technical Executive Summary.
- 1.4. The costs included in this paper are for the medium-based options for the remaining 4 years of the roadmap (FY2021/22 to FY2024/25). Further detailed considerations will be made for each project at the time of preparation of the project initiation document. The individual projects of the overall Programme will be reported to and tracked at the

Customer and Digital Board and within the Capital Programme through the Corporate Landlord Board.

2.0. Recommendations(s) for Cabinet

That Cabinet:

- 2.1.** Approves the business case for the Brent Technology Roadmap, to be taken forward to Cabinet.
- 2.2.** Agrees that each subsequent scheme and where appropriate each project, will be subject to regular status reports which will be submitted to the Executive Director of Customer & Digital Services at the Customer and Digital Board and Capital Programme Board, in consultation with the Deputy Leader.

3.0. Detail

3.1. Objectives

The objective of earmarking a nominated capital fund for technology investments is to ensure that the Council remains current and the IT systems and infrastructure are reliable, resilient and robust, enabling officers to carry out their duties effectively and efficiently.

The investment will equip the Shared Technology Services (STS) with the tools to enable a modern approach to managing and +monitoring our datacentres, networks and devices to ensure efficiency in operations and secure protections are in place.

Following a number of very high profile cyber attacks it is particularly important that the STS have the ability to provide resilient and robust IT which is as safe as possible from security vulnerabilities. To ensure that the risk is as low as possible it is important that there is a significant investment in the IT infrastructure across the 3 partner councils.

The attached Executive Summary has considered the future IT landscape, the STS consider that the plan included therein represents the best possible approach for the Council. Investment in this roadmap supports the delivery of the five borough plan themes: every opportunity to succeed; a future fit for everyone; an economy fit for all; a cleaner, more considerate Brent; a borough where we can all feel safe, secure, happy and healthy; and strong foundations. Specifically the technology roadmap will directly contribute to delivering outcomes of enabling residents to get online and making every pound count, which are key elements of the strong foundations theme. Investing in secure, resilient and available IT enables council employees who use corporate technology to deliver departmental objectives effectively.

The overall cost of the Programme is c £35m shared with Brent, Lewisham and Southwark. Lewisham are contributing £10.1m and Southwark are contributing £14.2m to the IT Roadmap.

3.2. Options Appraisal

The STS considered a number of options for each individual project, which makes up the overall Programme. As the Programme is developed in detail, the options will be reappraised to ensure that they remain the best solution for the organisation. The investment will provide a secure, stable and resilient IT infrastructure for the Council.

Five key categories make up the IT roadmap:

- Datacentre Improvements
- Campus networking improvements
- End user modernisation
- Cyber protection
- Service improvements

Datacentre Improvements:

There are a number of key components of the datacentre improvement works. There is an immediate need to implement a new backup and disaster recovery solution. The replacement solution will protect the IT infrastructure and the council's data from malicious attack, such as the one recently experienced by another London Borough.

In the event of an IT failure, the council will be in a position to recover quickly by implementing changes in the way the data is stored. Upgrading the internet capacity and bandwidth ensures that future increases in demand are met. Early implementation of some of elements of this work has brought benefits to the council. As evidenced by the ability for all users to work at home. There is a currently a trend to move services to the cloud, including Oracle and MS products. As this increases there is a growing need to purchase and implement tools to control usage costs in this environment.

Network Improvements:

The connectivity and access controls between the data centres and each council site will need updating; scheduled for 2023 to 2024. More immediate are plans to update the Wi Fi access in the large and medium sites, this will bring faster and more secure access to users. Where necessary network equipment will be replaced in smaller sites in addition to reviewing and upgrading network connectivity across the estate. Software that will better manage our networks will be implemented across the IT infrastructure.

End user Modernisation

Work has begun on proof of concepts upgrading the AV equipment in some meeting rooms, this will continue across the Civic Centre in collaboration with the return to work group and colleagues across the organisation.

Mobile devices and laptops will need to be replaced over the next 4 to 5 years. As more people will be working at home it is important that the offer to users will enable them to continue to do this efficiently and effectively.

The current telephony contract will expire during 2023 and the replacement solution will need to be decided.

Cyber Protection

There have been a number of well-publicised malicious cyber-attacks, targeted at Local Government and other public sector organisations. Information from various security bodies suggest that this trend will continue and in all likelihood develop into an increased threat. It is essential that providers of IT related services maintain up to date, secure, robust and resilient IT infrastructure to combat the threat of malicious cyber-attack.

The STS will put a number of protections in place, which range from improvements to the firewalls, email and web protections, managing access controls and the patching regime.

Investing in new technology will have an added benefit of avoiding the additional costs of maintaining obsolete kit. Thus future expensive maintenance, in terms of patching and applying updates which would be needed to ensure that the technology stays supportable and secure is avoided.

Doing nothing was not considered an option as it would expose the council to significant risk around operational effectiveness, i.e. users being able to do their job and also to the threat of cyber attack. A cyber attack could result in the whole council being unable to operate for many weeks, possibly months, as experienced by a number of other councils recently.

3.3 Benefits to council

The investment will result in the following high level benefits:

- **Reduction in cost of services**
The technology landscape is always evolving, with a constant high number of new entrants into the market, which results in higher competition and costs being driven down. In addition to costs, relatively moving downwards, it is essential to consider cost avoidance. Maintaining old, obsolete kit brings with it costs of ensuring that the equipment remains usable and secure from attack. As both software and hardware ages the risk of failure and malicious activity grows exponentially as patches, (software updates) are continually having to be applied until the vendor of the software no longer provides these updates; leaving the organisations who continue to use the software unsupported. In terms of aging hardware, there becomes an ever increasing risk of parts failing and replacements being unavailable.
- **Improvements in service experience**
The user experience is becoming more of a focus for suppliers with an emphasis in new technologies to be user friendly and intuitive. This includes adapting to hybrid approaches to meeting with some participants in the same physical

location and some on video calls at the same time. The next laptop refresh will not become due until towards the end of the IT roadmap and at that time a range of devices will form part of the offer to meet the needs of the different types of users and use case scenarios, for the most cost effective and secure options. This will enable us to work more efficiently and effectively providing staff with the right tools and departments to realign resources to provide better services, and, deliver financial benefits and generate income

- **Enhanced security protection**
A prerequisite of all products across the technology industry is that they must be secure from cyber-attack. This is becoming more and more of an inbuilt feature. Together with greater sophisticated tools for monitoring and prevention being more readily available. However, it is important that the tools and knowledge of key staff are constantly kept under review as attackers are also becoming more sophisticated and well resourced.
- **Service resilience and availability**
The modern technology that is being developed is designed to be resilient and highly available, this is one of the key requirements of all applications and technological solutions. To ensure that these requirements are met there is a need for ongoing investment, ensuring that the Council's IT remains current, up to date and resilient. Increased resilience and availability for this infrastructure directly leads to our key customer facing and staff systems being more reliable and available when needed, and improves our protection and/or recovery capabilities against any malicious attack.

3.4 Alignment with strategic objectives

As outlined in the preceding paragraphs the objective of this investment is to ensure that the council can continue to operate efficiently, effectively and safely. This aligns with the objective within the Borough Plan of building strong foundations for the future. Specifically the technology roadmap will directly contribute to delivering outcomes of enabling residents to get online and making every pound count, which are key elements of the strong foundations theme.

3.5 Timescales

The Programme is scheduled for the next 4 years. It is a five-year roadmap which commenced in 2020/21. £0.5m was brought forward and approved in December 2020 to enable an urgent piece of work to ensure resilience and cyber security was in place.

3.6 Procurement

The appropriate procurement governance and rules will be followed for each phase of the Programme and where individual projects or purchases require.

3.7 Risks

As outlined in the previous paragraphs, the risks of not investing in the IT Roadmap are considerable to the council's operations. It is imperative that the IT infrastructure is up to date and well maintained to ensure that employees, Councillors and residents have full, safe access to the council's IT services which form the foundations which enable virtually almost every Council employee to be able to do their job effectively and efficiently.

During the lifetime of the IT Roadmap programme each new project will be subject to close scrutiny and will require a project initiation approval process at Customer and Digital Board. This will include a re-appraisal as to whether the proposal remains the best option for the Council and delivers value for money.

4.0. Financial Implications

The table below sets out the known requirements for capital IT investments over the next 4 years.

Table 1 - Total required investment by scheme

Description of Benefit (Major Category)	Financial/ non-financial benefit?	Estimated benefit amount? £m	One-off or recurring?
Data centre Improvement	Resilient IT	3.8	One off
Campus networking refresh	Reliable/Robust IT	1.2	One off
End User Modernisation	Worker efficiency	3.7	One off
Cyber Protection	Cyber security	1.1	One off
Service Improvement	Efficiencies in service provision	0.5	One off
Total Investment 1 to 5 years		10.3	

- 4.1. The spend profile for the key investment areas over the next 4 years are as follows:

Table 2 – estimated investment

	2021-22 £m	2022-23 £m	2023-24 £m	2024-25 £m	Total £m
Data centre Improvement	1.4	1.0	1.0	0.4	3.8
Campus networking refresh	0.4	0.6	0.2	0.0	1.2
End User Modernisation	0.3	0.2	0.2	3.0	3.7
Cyber Protection	0.4	0.3	0.2	0.2	1.1
Service Improvement	0.1	0.1	0.3	0.0	0.5
Total Investment 1 to 4 years	2.6	2.2	1.9	3.6	10.3

- 4.2. The revenue costs associated with the capital spend detailed in the IT Roadmap results in savings over the life of the Programme, as detailed in the table below.

Table 3 – Revenue Implications

	2021-22 £'000	2022-23 £'000	2023-24 £'000	2024-25 £'000	Total £'000
Revenue Increases	27	188	27	27	269
Revenue Decreases	-332	-332	-332	-332	1,328
Net Saving	-305	-144	-305	-305	1,059

- 5.0. **Legal Implications**
None.

- 6.0. **Equality Implications**
None.

- 7.0. **Consultation with Ward Members and Stakeholders**
The Brent Technology Roadmap forms part of the overall Shared Technology Services (STS) Technology Roadmap for the three partner councils, and has been reviewed by STS Operational Management Group, STS Joint Management Board and STS Joint Committee.

8.0. Human Resources/Property Implications (if appropriate)

Not applicable.

Report sign off:

Peter Gadsdon

Strategic Director of Customer and
Digital Services

Technology Roadmap 2021-2025 Exec Summary

MARCH 31ST 2021



Version Control

<i>Version</i>	<i>Summary</i>	<i>Date</i>	<i>Editor</i>
1.0	First issue	26/03/21	TDG
1.1	Amended after review	29/03/21	TDG
1.2	Amended to include cost breakdown	31/03/21	TDG

Document Approval

<i>Version</i>	<i>Date</i>	<i>Approver</i>
1.2	31/03/21	Fabio Negro
	31/03/21	Sally Chin

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Introduction

This document summarises, for the areas listed below, what technology change and investment will be needed, and in which forecasted year, for Brent Council:

- Datacentres, Datacentre Networks & Campus Networks
- End User Experience Modernisation
- Cyber Protection
- Service Improvement

The driving ambition is to provide a suite tools to consume and a standard method of monitoring and managing our datacentres, networks and devices to provide efficiency in operation and security protections.

The total Capital Spend for FY2021/22 to FY2024/25 is forecast to be £10.3m.

Whilst this document provides an overarching view of the proposed technology changes over the next five years, a more detailed Business Case will be written for each investment to fully detail the total cost of ownership and benefits case.

A summary of the investment estimate over the 5-year period is included in each section, along with an indication of the types of benefits targeted by the investment. These are indicated using the tags below:



Reduction in cost of service



Service experience improvement



Security protection
























Service resilience & availability


It should be noted that at this early stage, defining empirical benefit targets for each investment is not possible, and this will be defined as part of the development of business cases. Also, many of the items listed have co-dependencies with other investments in the roadmap to fully maximise the outlined benefit.

Overall, during this 2021-2025 period, we will annually review our Service Levels and Key Performance Indicators. With the investment & changes listed within this roadmap, we aim to improve our availability KPI from the current 99%, to 99.9% and we will seek to improve on other SLAs and KPIs as we progress.















Datacentres, Datacentre Networks & Campus Networks

Total Investment £5m			
Technology Area	Capital Investment	Benefit Type	Activity
Backups and Disaster Recovery	21/22 £850k		We are replacing our legacy backup solutions for the Council with one that can provide a robust and resilient solution which further protects us, and our data, from malicious attack. We will implement an automated recovery solution that can, in the event of a disaster or mass failure of services, restore these in order of priority quickly and efficiently.
Storage and Virtualisation	21/22 £100k 22/23 £250k 23/24 £100k 24/25 £100k		We propose to move incrementally from our physical storage and virtualisation infrastructure to a new hyperconverged infrastructure (HCI). This proposed architecture is also a “one datacentre” solution using Disaster Recovery as a Service (DRaaS) which will further enhance our ability to restore quickly (Recovery Time Objectives or RTO) and to a more complete restoration of service (Recovery Point Objectives or RPO).
Internet Connectivity	21/22 £50k		An upgrade to 10Gbps capacity and bandwidth for our internet connectivity is now in place, which enables us to meet our existing & expected future requirements, including the recently increased demand for remote access.
Data Centre Hosting	21/22 £50k 22/23 £500k		We will seek to further review and, if financially and operationally opportune, consolidate the number of datacentres that we have in place.
Cloud and Data Centre Automation and Tools	21/22 £50k		We will implement tools that integrate with both public and private clouds that can automate provisioning of virtual machines, improving both the speed & cost of responding to requests from our Partners. As more services move to cloud, we will have an increasing need to control usage costs in this environment, so we will introduce products that will enhance our capability to manage cost.

Data Centre Operating System refresh	£300k per year (Total £1.5m)	 	We envisage that we will have a continual programme of work to replace our aged Microsoft Windows Server operating systems with their finite support lifetime, so that the environment can be effectively managed, patched and supported.
Remote Access Thin Client Solutions	21/22 100k	  	Most remote access is now managed via our Direct Access laptops, which has reduced our previous dependency on Thin Client solutions but not entirely replaced this need for some Council services and teams. We will seek to continue to reduce this dependency and to simplify our remote access solutions, replacing Direct Access, which is no longer being developed by Microsoft, with a solution that provides a seamless user experience.
Data Centre Network	23/24 £300k	 	The connectivity and access control to, and from, our datacentres is critical to all services provided and we will need to refresh these key elements by the lifecycle end of our current equipment, in 2023-24.
Large and Medium Site networks	21/22 £500k 22/23 £200k	  	Updating the Wi-Fi access to more modern WiFi-6 or Wifi-6e in large and medium sites will offer faster and more secure Wi-Fi access to our devices. We are due to test several options in 2021-22 with a plan to refresh Wi-Fi in all key office locations. Edge switches provide the wired network connectivity from a device such as a laptop or desktop on a wired network connection in the council offices.
Smaller Site Networks	22/23 £200k	  	Network equipment at smaller Brent sites are due to be refreshed in the next 2 years. We will seek to replace this network equipment with a robust, secure and resilient solution based on modern network technologies as outlined in the next section below.
Network Controls	23/24 £200k	  	We intend to move our network controls from physical devices that require individual management to modern “Software Defined” solutions that are more cost effective for operation: <ul style="list-style-type: none"> • <i>Software Define Networking (SDN)</i> allows the network to be controlled from a central location by programming the behavior of the network through APIs (application programming interfaces). SDN is focused on Local Area Networks (LAN’s) within a single location and offers the flexibility of management to adapt the network to the needs of the organisation very quickly. • <i>Software Defined Wide Area Networking (SD-WAN)</i> focusses on the links between sites over a large geographical area. SD-WAN is provided by and run by a network vendor rather than internal resources and provides considerable control over how data flows across links and using the optimum route to reach its destination.



Telecoms	Reduction in revenue costs with SD-WAN		<p>We will need to replace, and have the opportunity, to evaluate the networking technologies that should be used to connect Council sites. One option being considered is to use SD-WAN over Internet connections. If SD-WAN is implemented, savings would be realised from the decommissioning of our existing telecoms networks and links. Whilst undertaking this change, we will have the opportunity to consolidate supplier contracts, providing better economies of scale.</p>
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End User Experience Modernisation

Total Investment £3.7m			
Technology Area	Capital Investment	Benefit Type	Activity
Meeting Rooms	21/22 £120k		Audio Visual (A/V) equipment that provides a more engaging experience for those in the room and attending remotely, which is becoming increasingly common in this era.
Laptops	24/25 £2.9m	   	The next laptop refreshes are not due until towards the end of this technology roadmap period, however plans & costs are included to replace laptops for all employees. At that time, we will seek to offer a range of devices to meet the needs of the differing use cases & scenarios and implement the most cost effective and secure device security protections available.
Mobile Devices	£150k per year (Total £600k)	   	We continue to offer the best value iPhones (currently iPhone SE) which provide the best longevity for device and operating system support. We will be adding an appropriate Android phone choice during 21/22 as an alternative. The exact offering for the Android option has yet to be agreed, but both offerings are to be managed through the same Mobile Device Management (MDM) platform, InTune, and we plan to migrate all existing phones to this solution in the near future.
Telephony	22/23 £30k	  	Over the next five years we will need to review the telephony needs and potentially replace our existing solutions. As the strategy for telephony has yet to be decided, any change is not depicted in the roadmap currently.
End Point Tools	21/22 £40k	 	One of the areas that has the potential to make the end user experience more secure and performant is the provision of class leading end point management tools. The implementation of these tools is included in the roadmap, along with the cost saving for retiring our current solutions.

Cyber Protection






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Total Investment £1.1m			
Technology Area	Capital Investment	Benefit Type	Activity
Security Edge devices	21/22 £250k		<p>Our Load balancers and firewalls will require replacement during this roadmap lifecycle. In addition to managing the data traffic & flow, these provide protection to/for our datacentre and network environments.</p> <p>For further protection, we use “Managed Detection and Response”, which provides a service which protects most of the server estate via an agent on each server. This service has proved invaluable in mitigation of breach attempts. We plan to now implement this technology to all laptops, as the security of the Council’s data & systems are of paramount importance.</p>
Email & Web Protection	N/A		<p>One of the major attack vectors continues to be by Email and we will be implementing further protections in 21/22 provided by Proofpoint Fraud defense and Proofpoint mail filtering. Proofpoint has proved itself to be a very capable solution, with extra features being added this year to protect Very Attacked Individuals (VAIs) whereby any suspicious email links will be opened in an isolated session, therefore improving protection.</p> <p>The current web filtering solution is provided by a solution due to be renewed in March 2020 as a 3-year tender with options to extend for years 4 and 5. An appropriate web filtering solution is needed to protect the environment from malicious actors and protect staff and public using both Wi-Fi and library computer from inappropriate content. In addition, Real Time Email risk assessment solutions, which use nudge theory to engage with staff on a regular basis, deliver enhanced security awareness with regards to email threats.</p> <p>With the move of more services to “Software-as-a-service” (SAAS) solutions, standard web filters do not give granular enough filtering and logging of actions which take place. Modern solutions can identify new cloud services, identify the use of shadow IT and access the risk of identified services. Data loss prevention policies with encryption and data labeling can be applied.</p>

Privilege Account Management	N/A		We will implement Privilege Account Management and Privilege Endpoint Protection to further enhance access security alongside our password management solution used by technical teams who, by necessity, have the greatest access to our IT environment. Privileged users are one of the biggest internal risk and threat actors who breach the perimeter will be looking to exploit privileged accounts first, as it enables them to access and create issues across critical systems. For all other users, Endpoint Privilege Management technologies combine application control and privilege management to ensure that only trusted applications run, and that they run with the lowest possible privilege.
Security Information & Event Management	22/23 £600k		Security Information & Event Management aggregates event data produced by security devices, network infrastructure, host and endpoint systems, applications, and cloud services. This data is combined with contextual information about users, assets, threats & vulnerabilities to provide real-time analysis of events for security monitoring, historical analysis and support for incident investigation, management & reporting.
Patch Management	21/22 £50k		With the number of servers that are managed, patch management can be time consuming and costly, so we are in the process of purchasing a solution to patch the server estate using agents that simplify the process of patching the operating systems. This would also be used to patch applications installed on the servers. This will help us maintain high protection of systems & servers and keep downtime and service interruption to a minimum.
Media Management	21/22 £50k		USB and removable media control is one of the NCSC 10 steps to cyber security. More granular solutions than we currently have will be implemented, such as ensuring the removable media is encrypted before use. Where removable media is allowed more policies will be required to ensure the secure sanitisation of the storage media to prevent data loss.
Security Monitoring & Assurance	21/22 £50k 24/25 £60k		Each year we need to assess and test our security for compliance and assurance purposes. Penetrations Test are undertaken by accredited suppliers against internet facing services. With the rate of transformation increasing year on year the number of tests are also increasing. STS propose to tender for this supplier to get the best value. In addition to these assessments and checks, we will expand our current vulnerability management solution across the whole estate to understand all of the assets, vulnerabilities and associated risk profile.

Service Improvement

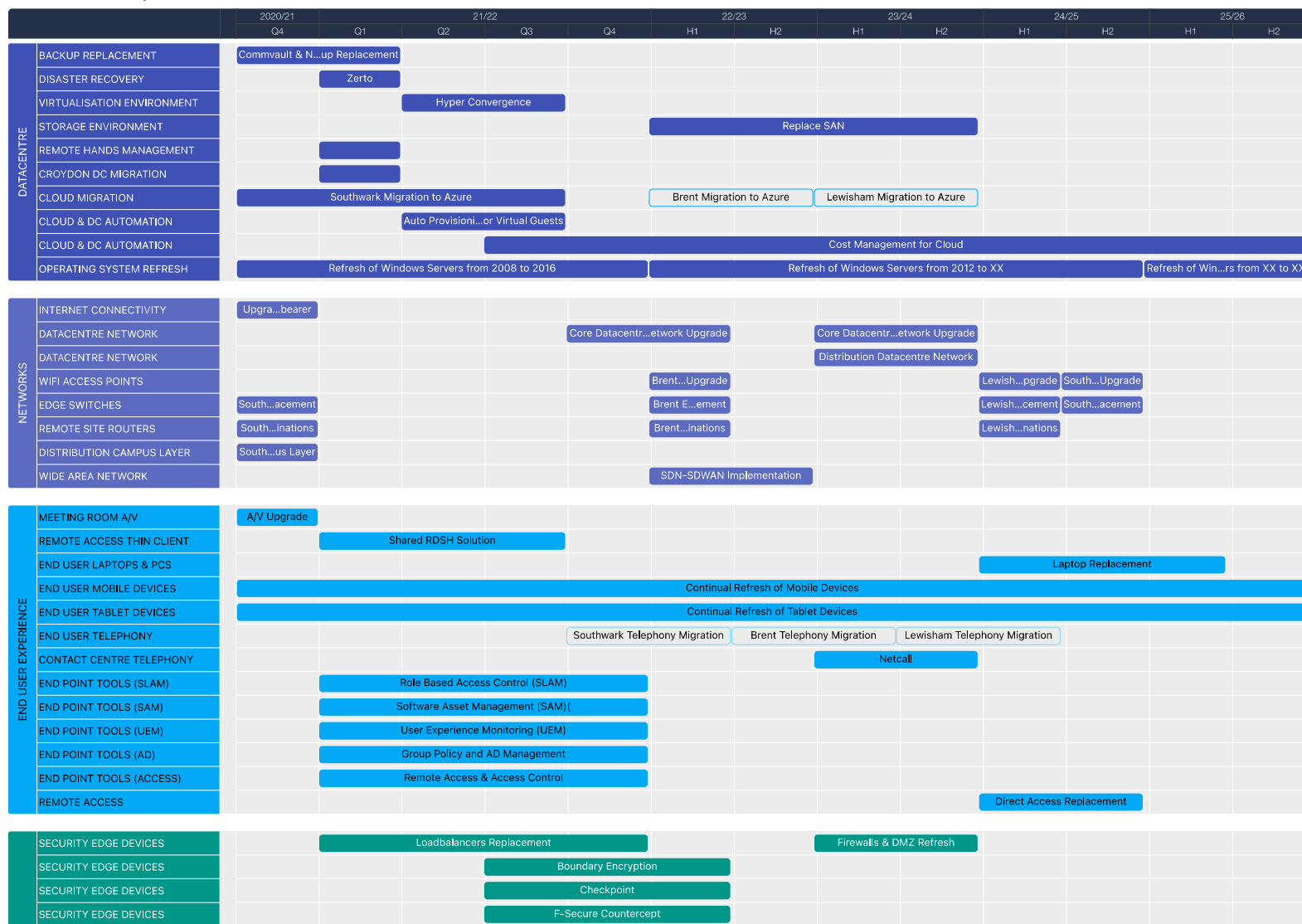
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Total Investment £0.5m			
Technology Area	Capital Investment	Benefit Type	Activity
Service Management tooling	23/24 £200k		Our Service Management system has been the primary user interface now for several years for logging incidents and requests. We are due to review the needs of our entire operation (including project management, asset management & supplier management) and, if beneficial, replace this solution within the roadmap period.
Configuration Management	23/24 £100k		The shared service has invested considerable time and resources in improving the monitoring and alerting of its infrastructure: both hardware and services. The primary tools used are Microsoft System Center Operations Manager (SCOM), Microsoft Azure Resource Monitoring, Solarwinds Network Performance Monitor (NPM). We are due to review the needs of our entire operation and, if beneficial, replace these solutions within the roadmap period.
Business Automation agents	22/23 £50k		Solutions such as virtual chat agents, Robotic Process Automation (RPA), WhatsApp for Business & iMessage for Business may well be utilised in future, and we will seek to use these solutions within the service for the benefit of our user community where this is beneficial. Some RPA is already in place in Brent.
IT Service Messaging	21/22 £50k		Having the ability to communicate to staff effectively in the event of an outage would improve our handling of such outages and there are solutions available to proactively alert staff affected by a particular outage, which we plan to implement over the period.
Asset Management Tools	21/22 £50k		Our current asset management tools and processes are too disaggregated to enable cradle-to-grave asset management of our & devices estate. The intent is that we manage our entire estate via one solution, which will provide benefits for maximising our asset life & utilisation (e.g. reallocation of assets rather than purchase).

Staff technical training	N/A		<p>We are committed to providing the necessary technical training to staff to enable them to carry out their tasks to the best of their abilities. We will invest a part of our training budget with a training provider, as this will bring significant discounts on retail prices across the available curriculum. In addition, we will fund the cost of certification exams where appropriate as these will benefit the IT service in being able to show our expertise and knowledge in key product areas.</p>
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Roadmap plan

Below is the full roadmap of all activities mentioned in this document.



		2020/21	21/22			22/23		23/24		24/25		25/26			
		Q4	Q1	Q2	Q3	Q4	H1	H2	H1	H2	H1	H2	H1	H2	
CYBER PROTECTION	SECURITY EDGE DEVICES				Manage Detection Response										
	CONTENT FILTERING					Email Filtering									
	CONTENT FILTERING					Proofpoint Fraud Defence									
	CONTENT FILTERING					Proofpoint Filtering									
	CONTENT FILTERING					Web Filtering									
	CONTENT FILTERING					Forcepoint									
	CONTENT FILTERING					Real-time Email Risk Assessment									
	ACCESS MANAGEMENT					Cloud Access Security Broker									
	ACCESS MANAGEMENT					Password Safe									
	ACCESS MANAGEMENT					Privilege Account Management									
	ACCESS MANAGEMENT					Privilege Endpoint Protection									
	ACCESS MANAGEMENT					USB Lockdown Tools									
	MANAGEMENT & ASSESSMENT					Security Information and Event Management									
	MANAGEMENT & ASSESSMENT					Security Assessments & Penetration Tests									
	MANAGEMENT & ASSESSMENT					Vulnerability Scanning and Management									
	MANAGEMENT & ASSESSMENT					Operational Centre Investment (Mission Control)									
	MANAGEMENT & ASSESSMENT					Service Operations Centre Setup									
	MANAGEMENT & ASSESSMENT					Distributed Denial of Service (DDOS) Protection									
	MANAGEMENT & ASSESSMENT					Patch Management Tooling									
	MANAGEMENT & ASSESSMENT					Cyber Insurance									
SERVICE IMPROVEMENT	CONFIGURATION MANAGEMENT				CMDB Tooling				Configuration...nt Implementation						
	DEVICE & ASSET MANAGEMENT				Asset Management Tooling										
	SERVICE MANAGEMENT							Service Manag...Tooling Regresh							
	OPERATIONAL MONITORING							Operational Ma...ent Dashboards							
	BUSINESS AUTOMATION				Robotic Process Automation										
	USER SURVEYS				Feedb...uttons										
	IT HUB				IT Hub...ueing										
	SKILLS TRAINING	Continual Technical Training for Staff													



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